

LETTER of APPEAL

July 2, 2018

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Applicant/Appellant Name:	Richard Senturia, Consultant for Applicant/Appellant
Applicant/Appellant:	St. Anthony School of Milwaukee
FCC Registration Number:	0011854791
Billed Entity Number (BEN)	61046
Form 471 Application Number:	1040928
Funding Request Number(s):	2837203
Funding Year:	2015
USAC Appeal Denial Date:	5-2-2018

To whom it may concern:

We hereby appeal the decision of the Universal Service Administrative Company (“USAC”) dated May 2, 2018, denying FRN 2837203 on the basis that USAC considered the filing of the relevant Billed Entity Applicant Reimbursement Form (“BEAR”), and the invoices attached thereto, untimely. USAC’s May 2, 2018, denial stated:

Invoices must be postmarked no later than 120 days after the last date to receive service, or 120 days after the date of the Form 486 Notification Letter, whichever is later. You did not demonstrate otherwise in your appeal. Therefore, your appeal is denied.

However, USAC itself caused this problem by failing timely to notify consultant Richard Senturia (the “Consultant”) of the approval of the previous USAC appeal, which Consultant filed on November 2, 2017, and which USAC approved on December 7, 2017.

USAC did not provide the December 7, 2017, Administrator’s Decision on Appeal, which approved Consultant’s request for an extension to file a BEAR, until USAC responded to an inquiry submitted by Consultant on February 13, 2018, inquiring about the status of the November 2, 2017, USAC appeal. On February 13, 2018, in response to Consultant’s inquiry, USAC finally notified Consultant that USAC previously approved the November 2, 2017, USAC appeal on December 7, 2017, and finally provided Consultant a copy of the December 7, 2017, Administrator’s Decision on Appeal.

Because USAC did not properly notify Consultant until February 13, 2018, of the approval dated December 7, 2017, Consultant could not file the relevant BEAR within the ordinary deadline

computed from the December 7, 2017, approval date. Consultant hereby requests that the FCC grant, for good cause shown, Consultant/Applicant's request for extension of time of 30 days from the date of the FCC decision on the appeal herein, to file a BEAR for FRN 2837203.

Please also consider that the vendor for FRN 2837203 hindered and continues to hinder the filing of the applicant's BEAR by refusing to communicate in any responsive way regarding the Service Certification for SLD Invoices forms requested by the applicant and the consultant from the vendor. Consultant prepared the relevant Service Certification for SLD Invoices himself, as the vendor refuses to comply. Such failure by the vendor partly formed the basis for the previous BEAR extension request(s), which USAC approved in the December 7, 2017, Administrator's Decision on Appeal that USAC failed to provide Consultant in a timely manner.

Following USAC's belated transmission on February 13, 2018, of the December 7, 2017, approval of Consultant's appeal for a BEAR extension, Consultant filed BEAR Invoice 2774564 on February 13, 2018. On February 15, 2018, USAC denied that BEAR on the basis that the BEAR filing date of February 13, 2018, occurred "Later Than FCC Extension Date [01/08/2018]." Consultant could not file the BEAR by January 8, 2018, due to USAC's failure properly to notify consultant of the December 7, 2017, decision approving the BEAR extension.

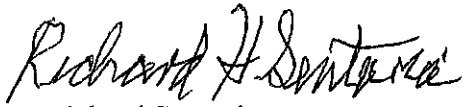
On February 22, 2018, Consultant filed its appeal with USAC of the February 15, 2018, BEAR denial, on the basis that USAC did not properly notify Consultant of the December 7, 2017, approval of extension, which prevented Consultant from proper awareness of the new/extended BEAR filing deadline. On May 2, 2018, USAC denied such appeal, as described above, and Consultant hereby appeals such denial.

Given the evidence presented, and in light of USAC's failure properly to notify Consultant of the December 7, 2017, approval of BEAR extension or properly to notify Consultant of the resultant BEAR filing deadline, we request additional time to file a BEAR for FRN 2837203. Please find attached the relevant Service Certification for SLD Invoices. Please also find attached the numerous BEAR filings on this FRN, dating as far back as October 28, 2016, providing the relevant invoices for reimbursement. These include:

- BEAR Invoice 2462673 dated October 28, 2016
- BEAR Invoice 2482834 dated December 9, 2016
- BEAR Invoice 2586631 dated May 10, 2017
- BEAR Invoice 2689186 dated September 14, 2017
- BEAR Invoice 2774564 dated February 13, 2018

Thank you for your consideration of this matter. Please let us know if you require any additional documentation or materials.

Respectfully,

A handwritten signature in cursive script, reading "Richard H. Senturia". The signature is written in dark ink and is positioned above the printed contact information.

Richard Senturia

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Consultant for Applicant/Appellant