**Narrative**

**Appeal/Waiver Request: Form 486 Filed Out of Window**

**North Central Area School District**

**BEN 131753**

**July 11, 2018**

After appealing to USAC and being denied, we are now appealing to the FCC to restore an original Form 486 filed within the proper window as described below.

On April 21, 2018, we appealed to USAC concerning RFCDL 82220 dated February 22, 2018 that reduced FRN 1699060969 by one month of service totaling $744. Our appeal asked USAC to restore the original Form 486 submission date of October 4, 2016, which was filed within 120 days of the FCDL dated July 3, 2016. This appeal to USAC was denied July 9, 2018.

There were several issues with the Form 486 during 2016, the first year of EPC.

   1.  On October 4, 2016, we submitted and certified Form 486 #17378 for FRN 1699060969 (Merit) and FRN 1699061012 (MiBell).

2. On October 26, 2016, we noticed that the service start date on 486 Form #17378 for FRN 1699060969 was incorrectly stated as 7/1/2015 instead of 7/1/2016.  I spoke with Matissa Harrison at EPC CSB that day and was advised to cancel Form 486 #17378 and submit a new one with the correct date. We were also advised that, since the original 486 # 17378 was submitted in a timely manner, this would not affect the effective reimbursement and start date for either vendor.  We were also advised to wait for “outreach” and the cancellation of 486 #17378 to be confirmed before submitting a new 486.

   3.  On November 17, 2016 we followed up with CSB (Case #135399) about the status of our cancellation request and was advised that the Account Administrator needed to certify the Form 486.  On November 18th, 2016 CSB confirmed receipt of the cancellation request.

   4.  On November 29, 2016, we were advised by CSB that 486 #17378 was cancelled and that we could now file a replacement 486.

5. On November 30, 2016 we submitted replacement Form 486 # 26306 (Merit) and #26308 (MiBell).

6. We received two "Urgent Reminder" notices due to an apparent glitch: one on February 28, 2017 with a non-existent BEN number 338791 and a "corrected" notice on March 1, 2017 regarding 486 forms that were still in review.

   7.  I spoke with EPC CSB on March 1, 2017 and was informed that our 486 forms were "all in order."

  8.  Fifteen months later (after filing our replacement Form 486 on November 30, 2016) - on February 22, 2018 we received a RFCDL 82220 for FRN 1699060969 reducing the committed amount by $744 - one month's reimbursement - due to a "late filing" of the 486.

9. On April 17, 2017 we received a letter from EPC reviewer Warren Fitch with the following message: “We are in the process of reviewing your Funding Year 2016 application for schools and libraries to ensure that it is in compliance with the rules of the Universal Service program.  Additional information is needed as the result of a recent review on**FCC Form 471 Application 161004224, FRN 1699060969.”**

10. On April 17, 2018 we reached out to Mr. Fitch by email and telephone, asking him to speak with Judy Bright, our E-Rate Coordinator, at [erategal@gmail.com](mailto:erategal@gmail.com) or 906-864-2712. We advised him that the date to appeal the February 22nd RFCDL was April 21, 2018 and we needed to speak with him before that deadline to appeal RFCDL 82220.

11. Having received no response from Mr. Fitch, we advised Mr. Fitch by e-mail and phone that, since he had not yet responded, we filed with USAC Appeal #93834 on April 21, 2018, seeking to restore the original Form 486 submission date of October 4, 2016.

12. This appeal was denied by USAC on July 9, 2018.