

Docket Number: 02-6

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW,  
Room TW-A325  
Washington, DC 20554

Waiver Request for out of window filing for Empower Community High School  
Application # 191042543

To whom it may concern,

Empower Community High School (ECHS) is requesting a waiver of the Form 471 filing window deadline for funding year 2019-2020 due to both the extremely time consuming process charter schools must follow to receive services in this program, and also to the fact that ECHS is a new charter school, just learning the process of E-rate.

The E-rate program allows schools and libraries to receive discounts on eligible goods and services. When the Universal Service Administrative Company (USAC) implemented the EPC Portal, additional criteria for schools was added to their ability to access these funds. Schools had to be classified as independent or a part of a school district to gain access to the EPC portal, which is where applicants complete the processes needed to apply for discounts. These two variations did not leave any consideration for states like Colorado, which have charter schools that operate independent of their district by electing its own board and maintaining its own financial systems. This criterion eliminates the ability for eligible entities in Colorado to apply for E-rate discounts.

In order for charter schools in Colorado to participate in the E-rate program, they must create a consortia account in the EPC system. This process is time consuming because not only is a new entity created, the charter school must be added to the districts portal prior to completing the form 471. Client Service Bureau representatives are not familiar with this process and give applicants a tough time setting up these accounts. By the time the account was set up, Empower Community High School had very little time to complete the application process on time.

Empower Community High School filed Form 471 (number 191042543) after the filing window deadline. These forms were submitted late due to the process required to allow a Colorado charter school access to the EPC portal so they can file for discounts. These forms were also submitted late because the school is brand new, about to open, and is learning the e-rate process.

The time it took to work through these issues was longer than expected and pushed the filing of the Form 471 past the filing window's deadline.

Based on the information outlined above, Empower Community High School is respectfully requesting the waiver of the filing deadline due to the circumstances that were beyond our control.

Please contact our consultant Chris Scott with G&G Consulting Group, LLC to discuss any details of the waiver request at:

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Thank you for your consideration.