**Request to re-submit Form 462 Previously Submitted on 5/22/2019 but lost by HCF System**

I have 15 plus years of experience with hardware emulation systems, software simulation and movement of complex, integrated system applications from system environment to system environment. In this Form 462 submission for FY2019 we experienced problems that would have been avoided, in any operating environment, if thorough operational testing had been done. I point to the RHC/HCF commitment to the Google Chrome operating environment and de-commitment to the use of the Microsoft Explorer environment, exposing users to problems such as the three listed below.

1. In a list of fiscal year options the most significant (current) is identified as the default. In the Form 462 this year the default year was either FY2019 or FY2018. This is not a functional default.
2. A data field in the Network Cost Work Sheet (FY2019) asks for a number of years of contract life, from 12 to 60. What I entered to this field was 36 (months). What was in the field during a data check at the receiving file server was a five numeric digit number. This caused my MY PORTAL password to be declared invalid and therefore, stop submission. This is extremely dangerous at the end of a filing window, when you consider that after 5 attempts at correcting this unknown issue, there is a two day wait before resuming submission. Fortunately, after multiple, unsuccessful calls to the RHC-Assist Help Desk, this problem was identified and corrected by the FCC technology team.
3. The receiving organization received my data, which is verified by the system assignment of Funding Request Number 18659531. No receipt or denial email was sent to me. The attached email states that the HCF has no record of submission.

Unfortunately, the group of 28 CommUnityCare sites were victim of problems #1 and #3, and suffer the resulting financial penalty for operational testing that could have been done at the host system.

In support of this request to re-submit this Form 462 for CommUnityCare MRC, we include the following documents.

1. Consortium tracking device used to collect data needed for submission.
2. Network Cost Work Sheet submitted with Form 462.
3. HCF acknowledgement of missing Form 462.
4. Explanation of request to re-submit Form 462.

**It is also significant** that this LoneStar Healthcare Communications consortium member (CommUnityCare) was also prevented from having their Form 462 submitted for non-recurring costs (NRC) in FY2018. This was caused by the Comcast national outage of 6/29/2018. An appeal was submitted (see attached file) requesting authorization to submit a Form 462 for FY2018 subsidy. There still has been no FCC response to this appeal.

These two Form 462 preventions, with no fault for CommUnityCare, is a total lost subsidy opportunity of:

1. FY2018 NRC subsidy of $1,189,244.62
2. FY2019 MRC subsidy of $215,406.05

**Total lost opportunity $1,404,650.67**

This is a very stiff penalty for a clinic group has done no wrong!!!

Kw07182019.docx