**Letter of Appeal to FCC**

**Date: 8/2/2019**

**Docket Reference Number: WC Docket 02-60**

**Filed by:** Kevin Welch

Healthcare Communications, Inc. (HCP #44699)

46 Exeter Avenue

Longmeadow, MA 01106

Tel. No. 781-953-2369

Email – [lkwelch1@comcast.net](mailto:lkwelch1@comcast.net)

**Documentation included in attached files** is In support of this request to either re-submit this Form 462 or affect the “roll-over” of the Funding Year from FY2017 to FY2018 for CommUnityCare MRC, we include the following documents.

1. The Form 462 for FRN #17256641 submitted on 6/20/2018
2. The HCF/RHC notice of approval of this subsidy request on 5/15/2019.
3. The HCF/RHC notice of de-commitment on 5/15/2019.
4. The explanation of this appeal for approval of FRN #17256641.
5. FCC Proceeding 06-136, Confirmation #201808-0424314229.

**Reason for Appeal** - 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 two listed below.

1. In a list of fiscal year options the most significant (current) is normally identified as the default year. In the Form 462 this year the default year was either FY2018 or FY2017. This is not a functioning default.
2. 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. This is a lost Form 462.

Unfortunately, the group of 28 CommUnityCare sites is now victim of problems #1 and #2, and suffers the resulting financial penalty for operational testing that could have been done at the host system.

**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. See Proceeding 06-136, confirmation #2018080424314229.

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

1. FY2018 NRC subsidy of $1,189,244.62
2. FY2018 MRC subsidy of $173,822.84

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

**Relief Sought with the Appeal is to Request to either:**

1. re-submit Form 462 Previously Submitted on 6/20/2018 or
2. have HCF/RHC affect a “roll-over” for FRN #17256641 from Funding Year FY2017 to FY2018.

txhcfCommUnityCareexplanationofrolloverorresubmitFRN17256641.pdf