**Letter of Appeal to FCC**

**Date: 8/2/2019**

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

**Filed by:** Kevin Welch

Healthcare Communications, Inc.

46 Exeter Avenue

Longmeadow, MA 01106

Tel. No. 781-953-2369

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

**Documentation included in attached files** In support of this request to re-submit this Form 462 for CommUnityCare MRC, we include the following documents.

1. Consortium tracking document used to collect data needed for submission.
2. Network Cost Work Sheet submitted with Form 462.
3. HCF acknowledgement of missing Form 462 dated 7/29/2019.
4. Explanation of request to re-submit Form 462.
5. FCC Proceeding 06-136, Confirmation #20190722383025371, previously submitted with incorrect Preceeding Number. (Initial filing of lost Form 462)
6. FCC Proceeding 17-318, Confirmation #201908020338706308 (incorrect proceeding number).

Submitted for reference. (FRN #17256641 approved then de-committed)

1. FCC Proceeding 06-136, Confirmation #2018080424314229 (incorrect proceeding number). Submitted for reference. (Comcast outage FY2018)

**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 three 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 FY2019 or FY2018. This is not a functioning 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 quickly identified and corrected by the FCC technology team.
3. The receiving organization (HCF) 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 are victim of these three problems, and suffer 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:

1. 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.
2. Monthly Recurring Costs (MRC) in FY2019. This was caused by the loss of FRN #18659531 after the submittal of the Form 462

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

1. FY2018 NRC subsidy of $1,189,244.62
2. FY2018 MRC subsidy of $173,822.84
3. FY2019 MRC subsidy of $215,406.05

**Total lost opportunity $1,578,473.51**

**Relief Sought with this Appeal** is to request authorization to re-submit Form 462 Previously Submitted on 5/22/2019 but lost by HCF System

txhcfCommUnityCareexplanationofrequestforresubmitF462.pdf