

August 12, 2019

Letter of Appeal
Ms. Marlene H. Dortch
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools and Libraries Universal Service Support Mechanism.
CC Docket No.02-6

In re:
Billed Entity Number 16051553
Appellant: E Rate Solutions Group
Applicant: **Tri County Community Action**
Fund Year: 2019 FCC Form 471: 191007337 (category 1)

Dear Ms. Dortch:

This is a "Letter For a Waiver of the time to file for an Appeal of the FCDL issued on May 30, 2019 Fund Year: 2019 FCC Form 471: 191007337 (category 1) due to various inherent flaws in USAC's EPC system as described in detail in Chairman Pai's April 18, 2017, letter to Chris Henderson of USAC, the USAC EPC ("Epic") Portal system, and USAC as a whole, have "serious flaws." For example:

- There were repeated problems and various outages with the EPC Portal input system, during which users could not respond to PIS questions. Information was given to reviewer via email regarding budget reductions.

The Chairman specifically instructed USAC to "identify alternative options to assist applicants even in the event of IT failures." In our case, such IT failures and other numerous problems evident in the USAC system and structure have prevented our responding to PIA inquiries and filing an Appeal by December 11, 2018.

Therefore we are formally requesting a Waiver of the time to file an Appeal of the FCDL to allow USAC to correct the Budget Allocation information. The Appeal was recently filed with all of the needed information, however USAC is unable to accept the Appeal as it is past the 60 Day Window. The Appeal of the FCDL was filed only a little late and the requested information was submitted as part of the PIA review but the reviewer processed the application without it. In addition, the Appeal Window happened during the Summer Deferral period while the school was not available.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,

Katherine M. Weiss

Consultant
