

August 14, 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 16057670
Appellant: E Rate Solutions Group
Applicant: AGRI-BUSINESS CHILD DEVELOPMENT/NY STATE FEDERATION OF GROWERS' AND PROCESSORS' ASSOC.
Fund Year: 2018 FCC Form 471:181007565 FRN 1899011683 & 1899011681 (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 October 18, 2018 Fund Year: 2018 FCC Form 471:181007565 FRN 1899011683 & 1899011681 (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 18, 2018.

Therefore we are formally requesting a Waiver of the time to file an Appeal of the FCDL to allow USAC to correct the duplication of services issue which should have been resolved when FRN 1899011681 was canceled during PIA. The Appeal was filed with all of the needed information, however USAC is unable to accept the Appeal as it was filed just after the 60 Day Window. The Appeal of the FCDL was filed less than 1 day late – see enclosed. In addition, the FCDL should not have denied this FRN as the

requested information was submitted as part of the PIA review but the reviewer did not process it. Please issue the requested WAIVER as System issues caused the appeal to be filed five minutes late.

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
