**2017 FCC Form 499A (Rev-1) Appeal:**

FCC Docket Number for Contributions: WC Docket 06-122

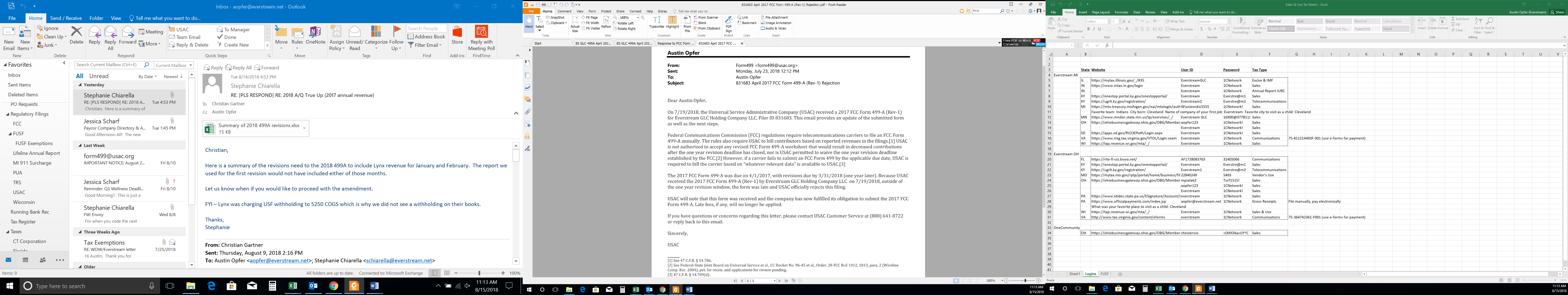
499 Filer ID: 831683 (Everstream GLC Holding Company LLC)

Contact Info: Christian Gartner

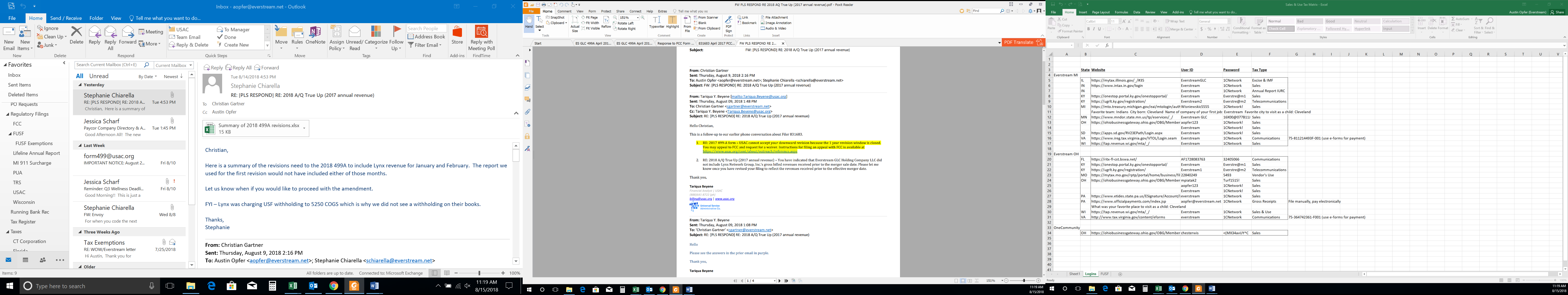
1228 Euclid Ave, Suite 250, Cleveland OH 44115

(216) 242-2874, cgartner@everstream.net

Rejection from USAC regarding Rev-1 filing:



Correspondence regarding appeal process:



**Problem/Reason for appeal:**

Everstream GLC Holding Company LLC acquired Comlink, LLC (Filer ID #826877) and Great Lakes Comnet (Filer ID #818716) on June 1, 2016 and established Filer ID #831683.

At the time of the acquisition, we implemented a new billing software and assigned new personnel to the 499 filings. Initially, we could only generate reports based on the physical A and Z locations of the circuits. Because we could not use these reports to determine the jurisdictional nature of the traffic, we reported all End-User Telecom and Non-Telecom revenue as 100% interstate on the 2017 499A.

During 2018, we implemented changes to the billing software that allowed us to report on the actual percentages of interstate revenue. We conducted a review of customer network designs, confirming the nature of the traffic, and traffic certification forms from customers (if applicable).

Based on our review, we over-reported Gross USF base interstate revenues by **$3,745,860** (see worksheet). This lead to an over assessment of our annual contribution in the amount of **$572,412** (see worksheet).

We submitted a revised 2017 499A that was denied by USAC because the one-year revision window is closed. We are seeking a waiver of FCC form 499 deadlines so that we can amend our filing and receive an adjustment for the $572,412 in contributions assessed in excess of what we billed to customers.