

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Request for Review of)	
Decision of the)	
Federal Communications Commission by)	
)	
Belmont Charter School)	File No. 181042880
Philadelphia, PA 19104)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
)	

PETITION FOR RECONSIDERATION

Belmont Charter School (BCS), by its consultant, respectfully submits this Petition for Reconsideration of the June 29, 2018 Order, DA 18-672, which denied BCS's Request for Waiver for application #181042880.

BCS originally submitted the Request for Waiver as it failed to file its FCC form 471 within the prescribed filing window. However, the Commission's staff denied the rule waiver as BCS had "failed to present special circumstances justifying waiver of [FCC] rules."

We respectfully submit there were indeed special circumstances that would allow the Commission to waive its rules on this occasion.

First, we would ask the Commission to note the closing date for funding year 2016 was on May 26, 2016 and the closing date funding year 2017 was on May 11, 2017. The change to a March 22, 2018 closing date for funding year 2018, nearly two months earlier than in the previous two years, was an unfortunate surprise for BCS's internal e-rate administrator, who had become accustomed to a later filing window.

Second, when the BCS's internal e-rate administrator sought counsel from SLD regarding this matter, he states that he was advised that many schools had the same problem and for the same reason. If we were to accept that information prima facie, then it could be perceived that an underlying systemic issue, and therefore a special circumstance, may exist.

Third and finally, the school is in merely asking for continued financial assistance for a multi-year category one contract that USAC has already funded for the two prior years, and would have most likely continued to fund this year. The administrative burden of having to file FCC forms 471 on an annual basis in order to continue funding for multi-year contracts presents an increased risk of error or failure, as demonstrated in this instance. Since the intent of the program is to assist billed entities with obtaining and maintaining proper Internet connectivity, and since the current program rules do not allow for the filing of multi-year forms 471, we submit that it is in the Commissions' interests to allow the rule to be waived on this occasion.

Wherefore, BCS requests the Commission grant the originally requested rule waiver.

Respectfully submitted,

BELMONT CHARTER SCHOOL

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