

## Sharon-Mutual Public Schools

210 South Maple      Mutual, OK 73853      (580) 989-3210

September 24, 2018

Appeal and Request for Waiver

VIA EFCS filing

Ms. Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554  
CC Docket No. 02-6

Entity: Sharon-Mutual Public School District  
BEN: 140000  
Funding Year: 2017  
FCC Form 471 Application: 171046227  
Funding Request Numbers: 1799105585, 1799105543, 1799105911  
Authorized Contact Person: Jeff Thompson

Sharon-Mutual Public School District requests the review of the action taken by Universal Services Administrative Company ("USAC") with respect to the above mentioned application and subsequent denial.

### I. BACKGROUND

On November 1, 2016, we posted an FCC Form 470 seeking bids for Category Two Internal Connections for Sharon-Mutual Public School District (FCC Form 470 Number 170048471). After evaluating all bids, we selected the bids from Beasley Technology in the amount of \$31,160.50.

On May 11, 2017 we filed a request for funding for Internal Connections and Basic Maintenance based on the contract selected with Beasley Technologies. We received a several requests for additional information from Program Integrity Assurance ("PIA"). We responded to all requests with additional information. However, the final request to reduce the requested funding below the budget led to some confusion. The EPC Portal does not easily allow this reduction, and an additional form had to be created to submit the information. The Technology Directory utilized the administrative login, not his own, to reply to all requests for information. He responded on 10/24/2017 with the reduced funding request to be below the budget caps for each of the district's individual entities. Despite the PIA responses submitted, we received a notification that USAC had denied the application in its entirety due to insufficient information to reduce the request below the allowable Category Two budget.

The technology director expected a response from the information submitted on 10/24/2017. He expected a response from USAC to guide him on the next steps, and assumed the response was pending

PIA review at that time. The vendor, Beasley Technologies, installed equipment and attempted to bill for the installed items in March 2018. This is when it was discovered that the funding had not been approved, and the additional information had not been reassessed by PIA. He discovered no actions had been taken by USAC to the submitted information, and subsequently filed an appeal on March 8, 2018 to USAC. The response from USAC was that the appeal was filed more than 60 days after the FCDL was issued.

The Technology Director was responsible for submitting the requests for funding and information through the EPC Portal, and logged in utilizing the administrative login, not his own. This led to some additional confusion and delays in response. This employee is no longer employed by the district, and tasks were left incomplete. When the vendor, Beasley Technologies, reached out again September 2018, we became aware of the incomplete filings.

## II. DISCUSSION

Sharon-Mutual Public School District is a small school district with limited resources. We do not employ an E-rate consultant, and the Technology Director was the one staff member dedicated to working on E-rate. The added complexity of filing for Category Two services and the limitation of the funding program that processes requests, does not allow for exhaustion of the funding budget without the cumbersome process of reducing the funding request manually. This led to additional confusion and delays in response.

## III. RELIEF SOUGHT

Sharon-Mutual Public School District respectfully requests that the Commission approve a waiver of timely filing for the appeal of the denied funding request so that the FCC Form 471 number 171046227 can be reviewed with the additional information submitted reducing the request below the Category Two budgeted amounts. We also request a waiver of timely filing to the FCC due to staff changes and the individual responsible for the E-rate funding process is no longer with the district.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Thompson', is written over a horizontal line.

Jeff Thompson, Superintendent  
Sharon-Mutual Public Schools