

TO: FCC

FROM: Paul Karlin, Consultant for Arlington School District 16, Arlington WA

RE: Schools and Libraries Program: CC Docket No. 02-6

Requesting Deadline Waiver for Invoice #2681847

Issue: BEAR # 2681847 was a resubmission of a BEAR that was included in FCC's Order 17-526 of May 30, 2017. The deadline established for USAC for this invoice was 9-1-17. The invoice was submitted on 9-6-17, and it was rejected because it was requested after September 1, 2017 (see attached document: "*Arlington BEAR Letter Eman Networks 9-13-17*"). The district is requesting a waiver for the following reasons:

1. As stated in FCC Order 17-526, USAC was directed "to allow for resubmission of these BEARs and processing within the next 90 days." (see attached document: "*Arlington Y 2013 EMan Remand Letter from USAC 8-2-17*")
2. Although the FCC Order 17-526 was issued on May 30, 2017, the district did not receive notification from USAC until after August 2, 2017. The deadline for filing the BEAR in SLD's letter was September 1, 2017.
3. Based on the date of the remand notification sent to the district, the district was not given 90 days to resubmit the BEAR. The district was given less than 30 days to resubmit the BEAR. We believe this was not in compliance with FCC's directive to allow 90 days for resubmission.
4. Additionally, the remand decision letter was not received after August 2, during the middle of the summer. USAC recognizes that schools may be in limited operation during the summer and for this reason has a summer deferral process. In fact, the district was functioning with a limited staff and the 8-2-17 notice did not reach the proper personnel until after the 9-1-17 deadline.

Because the district was given less than 30 days, not 90 days, to re-submit the BEAR, and because the notification to resubmit the BEAR was sent during the summer when the district was not fully staffed, the district believes the deadline waiver should be approved as requested.

Your consideration is greatly appreciated.