**THIS IS A WAIVER REQUEST FOR DENIED INVOICE EXTENSION REQUESTS (CC Docket No. 02-60)**

**Federal Communications Commission**

**Attn: Letter of Appeal**

**445 12th Street SW**

**Washington, DC 20554**

Service Provider Filing the FCC Waiver: Charter Advanced Services (WA)

SPIN: 143037050

Service Provider Primary Contact Information:

David Ventimiglia

13545 Barrett Parkway Dr.

Suite 200

Ballwin, MO, 63021

FRN: 16875641

Applicant:

                HCP Number: 16649

                Name:  Yakima Valley Farm Workers Clinic - Mountainview Women's Health Center

                Address: 240 Division St, Grandview, WA 98930-1357

                Contact Name: Mark A Boggs

                Telephone: 502-292-2225

                E-mail: [mark.boggs@hcfundconnect.com](mailto:mark.boggs@hcfundconnect.com)

FCC Form 463 Invoice Number: 1000041713

Reason for the Waiver Request:

Due to the Funding Cap increase for FY2017, Charter Communications focus has been on updating our health care provider (HCP) accounts with the outstanding True Up amounts sent on 7/24/18 for over 230 FRNs due to a high volume of HCP demand. Simultanously, we were updating our records with the revised FCL information for over 920 FRNs that were sent from USAC on 7/30/18 in bulk list files.  During this same time period, the HCP questions and demands were so incredibily high due to the lack of clarity surrounding the USAC Webinar on 7/10/18. It is worth noting that to ensure full compliance of program rules, we review all statements, contracts, and billing for each Form 463 submitted which takes quite a bit of time to ensure all guidelines are met.

Deadline information is not located on the Action Required email (see Attachment 2) or located on the USAC portal next to the Form 463 submission thus it is impossible to prioritize the Last Date to Invoice based on the Form 463s that were filed following the Funding Commitment Cap increase. We did receive an email on 8/7/18 along with 22 others stating Action Required – Applicant Submission Notice, however based on the email there is nowhere listed that we had less than 72 hours to review and approve. In other words, on 8/7/18, we received a total of 23 Action Required emails with no easy way to identify that HCP 16649 FRN 16875641 should be top priority as mentioned above. Simultanously, we received multiple True Up inquiries from HCP applicants who previously submitted and received approved Form 463s for the 920 FRNS referenced above. There is still no Last Date to Invoice readily available on the USAC portal. We must open each individual Form 462 file to see when the invoice deadline is (see Attachment 3).

In addition, please see the timeline of events below as mentioned in the paragraphs above to further outline the impact these changes and processes had on our daily processes:

* 7/10: USAC Webinar informing HCPs and Service Providers not to approve any Form 463s until the revised FCLs were sent to account holders
* 7/24: True Up filed received for all prior approved Form 463s for FY2017
* 7/30: FCL Revised bulk list sent from USAC for 920 FRNs to update our files
* 8/7: 23 total Form 463s were submitted by applicants in the USAC portal including the Form 463 in question which was due 8/10
* 8/8-8/10: 41 Form 463s were submitted and awaiting an immediate turn around due to USAC portal updates haulting all Form 463 processing from 8/22-9/5
* 8/13: Charter Communications attempted to approve the Form 463 that had the Last Date to Invoice of 8/10

Charter Communications understands the changes to the RHC program for FY2017 were made to positively impact the HCPs, however the unforeseen process changes and lack of clarity to implement the Funding Cap revision has actually been a negative outcome to this health care provider. We have provided all required documentation which supports the statements above. The customer has done everything as required per program guidelines and they should be able to receive all approved funding for FRN 16875641. In order to do so, we ask that we are granted a waiver to allow for an invoice extension for the above FRN to recoup these funds from USAC to eliminate the unjust financial impact to the applicant that they were in fact approved for FY2017. In closing, we are trusting the FCC to make the best decision for the health care provider.

Please do not hesitate to reach out regarding any question you have in reference to this request.

Attachments:

* Attachment 1: Appeal Invoice Request email sent to USAC on 8.23.18
* Attachment 2: Action Required 463 applicant submission email 8.07.18
* Attachment 3: Funding Commitment Letter for FRN16875641