

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Petition for Waiver of)	
Special Construction Service Delivery Deadline)	
)	
InterMountain ESD filing on behalf of)	CC Docket No. 02-6
Huntington School District, BEN 145161)	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	

**Petition for Waiver of
Special Construction Service Delivery Deadline
RE: FCC Form 471 No. 181028314**

I. INTRODUCTION AND SUMMARY

The InterMountain ESD is an E-Rate consultant that processes and files E-Rate forms for over 80 school districts in Oregon, Washington & Idaho. Huntington School District is one of the school districts we provide E-Rate consulting services to.

We are requesting a waiver of our first extension of Special Construction Service Delivery Deadline date of June 30, 2020 based upon the unknown, often extensive, permitting timelines; specifically, the BLM and National Wildlife Refuge.

The Service Provider is unwilling, to risk a **three million dollar outlay** on this fiber build, with so many factors out of their control and an absolute Installation Delivery Deadline of June 30, 2020. The first seven months of the 2018-19 Funding Year were consumed by USAC processes, leaving just 178 days for high level fielding, permitting **and** installation. Not nearly enough time for this complicated build that has several layers of complexity as outlined below.

The January 2019 FCDL triggered the filing of Form 500 Special Construction Deadline Extension Request #147180, on May 30, 2019. This extension request was approved July 10, 2019.

The Applicant has been working for over 18 months, diligently following program rules to secure 100% of installation costs for this small, 90% Discount Rate school with the goal of bringing educational equality to these rural Oregon students.

The District's current Internet Access/LAN is provided by a 30Mbps LTE Wireless Data Plan paired with a Cradlepoint antenna, which is annually questioned by USAC reviewers, as even being an eligible service. Even though it is the only Category 1 funding requested and the most cost-effective Internet Access available.

Enhanced, more reliable fiber services are required to support rapidly growing bandwidth needs of the students and to meet the State Education Technology Directors Association standard recognized in the FCC Second E-rate Modernization order as the benchmark standard for bandwidth for school districts.

Special Construction Fiber Project Overview

The Service Provider/Contractor has identified required permitting in the table below. Although the timeline of receipt is unknown, based upon past experience, they have projected an estimate for each.

Type of Permit	Quantity Required	Estimated days to receipt
Pole Permitting	670	100
City/County-Right of Way Agreements	16	45
Easements-State, Federal and Private	15+	80
BPA Crossings - Land Use Agreement	2	60
Canals/Irrigation District Crossings	14	14
Bureau of Land Management	4	240
National Wildlife Refuge	1	240

The physical installation includes the following factors that add to the scale and complexity of the project.

- Distance- 31.8 miles
- Short poles along route require 190 new LSN 35' poles to be placed or make ready pole replacements from power company.
- 15,878' (50%) of total underground expected to need to be drilled due to difficult ground conditions or permit authority requirements.

- 3940' of underground is to be placed within the I-84 freeway ROW requirements special exemption from DOT and constrained access and working conditions on freeway shoulder
- 11,909' of total underground through hard compact or rock conditions. 75% of this is expected to be dealt with via a trench and rock hammer while the remaining will be require a drilling machine

In closing, the 94 enrolled students at Huntington School District, located in Huntington Oregon, (population 440), are a textbook example of why the FCC adopted Special Construction as part of the 2014 E-rate Modernization Order. Because of the limited income opportunities, no commercial Service Provider has deemed broadband service delivered to Huntington Oregon as a profitable investment.

Denying this Appeal to extend the Service Delivery Deadline, will immediately halt the project and result in the forfeiture of, not only E-rate funding but the Federal and State Match dollars allocated. A once in a lifetime chance for this district to benefit from high-speed broadband, at zero out-of-pocket installation cost, would be extinguished. The chance of the stars aligning in this way again are practically nil. In fact, the Oregon State Legislature was unable to recharge the Connecting Oregon Schools Fund for the fourteen 2019-20 applications that were filed for State Match.

II. Request

The InterMountain ESD respectfully petitions the Commission to request a waiver of the Special Construction Service Delivery Deadline on behalf of the Huntington School District, to extend the deadline to 24 months from the date of the FCC's ruling, allowing the Service Provider the necessary time to successfully complete the project.

Respectfully submitted,

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