November 9, 2018

To: Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

From: Montcalm Area Intermediate School District  
621 New Street, PO Box 367  
Stanton, MI 48888

RE: CC Docket No. 02-6 Applicant Request for Appeal

Applicant Information:

Montcalm Area Intermediate School District, 621 New Street, PO Box 367, Stanton, MI 48888  
Contact: Thomas M Staten

Phone: 616-225-6128  
E-mail: [tstaten@maisd.com](mailto:tstaten@maisd.com)

Billed Entity Number: 131263

SPIN 143028413 Clear Rate Communications, Inc.

2017 FRN: 1799109738

Amount: $2,185.30

USAC Decision: Denied, filed after invoice deadline

SPIN 143004346 Crystal Automation Systems, Inc.

2017 FRN: 1799108965

Amount: $45,452.74

USAC Decision: Denied, filed after invoice deadline

SPIN 143000677 Verizon Wireless

2017 FRN: 1799109416

Amount: $1,803.72

USAC Decision: Denied, already fully paid.

Appeal Request:

As per guidance provided by the Schools and Libraries Corporation, I would like to request an appeal of USAC’s decision of denial of invoice extension by requesting a waiver of FCC rules regarding the 120 day invoice deadline under CC Docket No. 02-6 to allow late invoices be reviewed and considered for funding.

After submitting my 472 Bear invoice applications on 10/30/18 I received notice all three were rejected due to the deadline date of 10/29/19. My applications were submitted and accepted but due to administrative clerical errors when counting the number of days and expecting the due date to be the end of the month, district applications missed the deadline by less than 24 hours.

The invoice deadline search provided confusing and inaccurate information as noted in the attached file. All applications were initially entered at the same time with same service start times and invoice ending times but ended up with differing invoice deadline dates. It appears as though 1799109416 was either, automatically given an extension, or approved and paid as requested, while the two others were not and then the email confirmation contradicted this information and stated all denied. I also only received 2 of 3 bear confirmation emails for 2882358 and 2882355, even though all three were certified after submission including 2882360.

I would like to respectfully request a waiver of FCC rules to allow an invoice extension so that district invoices submitted to USAC after the 120 day deadline will be accepted for payment. The rationale for this request is due to administrative clerical errors, missing the deadline by less than 24 hours, and the fact that loss of these funds would cause a significant financial burden on the school district.

Thomas M Staten

Technology Director