November 19, 2018

Waiver Request

Federal Communications Commission

To Whom It May Concern:

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| Entity & BEN | Pine Mountain Regional Library #127540 |
| Contact Person | Lorraine K. Smalley |
| Contact Information  Mailing Address  Phone Number  Email | 218 Perry St.  P.O. Box 709, Manchester, GA 31816-0709  706-846-2186, ext:113  lsmalley@pinemtnlibrary.org |
| Service Provider | Aios Group, LLC (SPIN:143047939) |
| Funding Year | 2018 (July 1, 2018 – June 30, 2019) |
| Application Type & Application Number | Form 471 #181024535 |
| FRN | 1899050354,1899050463,1899050521,1899050580,1899050632,  1899050693,1899050749 |
| Reason for appeal | Invoice denial for “services not requested on 471” |

**Reason for Waiver:**

Our Universal Service Administrative Co. (USAC) appeal was denied based on the 60-day deadline rule. However, USAC calculated the 60-days from our FCDL date but we were calculating the 60-days from the decision being appealed – a zero-funded SPI. Our appeal was filed within 60 days of the zero-funded SPI. We are asking that you waive the 60-day rule to appeal and reconsider our original appeal request (please see below)

The Pine Mountain Regional Library (BEN:127540) was funded for an FY 2018 Category 2 project to replace network cabling in library branches. We are asking that Federal Communications Commission waive the 60-day rule to appeal and reconsider our original appeal request for the following Universal Service Administrative Co. (USAC) Form 471 #181024535 which contains these FRN#s: 199050354, 1899050463, 1899050521, 1899050580, 1899050632, 1899050693, and 1899050749 for the following reasons:

* We made a clerical error on the Form 470 and Form 471 when selecting the Category Two service type. The service type should have been “Internal Connections” rather than “Basic Maintenance of Internal Connections.” We misunderstood the different service types and clicked the incorrect box on our forms.
* Although the incorrect service type was selected on our forms, these services were properly bid. We issued a RFP with our Form 470 that clearly described the services we wished to receive.
* We received no PIA inquiries for these FRNs. Had a reviewer looked at our bid documents during the review process, they would have caught the error on our forms and either corrected the issue or denied the project in PIA, rather than in invoicing. At this point, the project is partially completed and the service provider needs to be paid.

**Relevant Relief**:

Due to this issue, we paid our service provider for equipment installed. We ask that USAC allow us to change our invoicing mode to BEAR and reimburse the discounted amount of this project. The issue of the incorrect service type being selected on the 470 and 471 should have been caught in PIA

Although expedited funding commitments are appreciated, denial in invoicing (after work has been performed) leaves applicants with few options to correct the problem. It was our intention to follow all E-rate rules – we simply misunderstood the C2 service types. Thank you for your time and attention to this matter.

Sincerely,

Lorraine K. Smalley