

11/18/19

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
CC Docket No. 02-6

## Letter of Appeal – Request for Waiver

To Whom It May Concern:

Entity & BEN	Oconto Unified School District
Contact Person	Tiffany Bullion
<b>Contact Information</b>	
Mailing Address -	PO Box 451 Syracuse NY 13206
Phone Number -	315-422-7608
Email Address -	trb@e2exchange.com
Funding Year	2019
Application Type & Application Number	Form 471 Application Number #191014089
FRN	#1999018837
Appeal Reason	Ministerial/clerical error
Proceeding No.	02-6

### Appeal Explanation:

We are requesting a waiver of the rule to submit an appeal within 60 days of the decision letter. We would like to appeal the FY2019 Funding Commitment Decision Letter dated 5/9/2019.

E-rate filing is not the primary role of staffers at Oconto Unified School District and as such rely on an Erate consultant to complete the data entry and filing. Due to the complex nature of the Erate program, the unpredictable timeline for USAC Form reviews and USAC approvals, the limited time and resources that the school district can devote to Erate and miscommunication between parties- the ministerial/clerical error was not noticed until after the required 60 day appeal period.

Oconto Unified School District completed the FY2019 Form 470 process from 11/13/18 to 12/12/18. More than a month later on 1/24/19 the school district was able to evaluate the bids received and selected CDWG as the winning vendor. All items on the proposal were included in the overall costs that were compared against the other vendors, with price as the most heavily weighted criteria. CDWG was the winning vendor. The proposal was signed with approval another month later on 2/22/19. This proposal was then used to data enter the Form 471, where the ministerial/clerical error occurred and the items on the remaining pages of the proposal were simply omitted. Please note the signed proposal with all items, including those omitted during data entry, was uploaded into the EPC portal as contract #259134 prior to certification of the Form 471 and also provided to the assigned Program Integrity Assurance (PIA) reviewer. The missing items and mismatched totals were not questioned by the reviewer and the Form 471 was approved on 5/9/2019. It was not until construction was able to begin in early fall that the missing items were noticed, which was after the 60 day deadline.

As such, we are filing this request for waiver in order for the FCC appeal to be reviewed and the under funded FRN 1999018837 be fully funded per the documentation. Not to consider fully funding the project for Oconto Unified School

District or dismissal of the appeal based on the 60 day appeal requirement would be a disservice to the school district.  
We appreciate your consideration.

Sincerely,

Tiffany Bullion

Director of Operations

E2e exchange, LLC