

11/18/2019

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

Re: Letter of Appeal of Funding Commitment Decision Letter for funding Year 2019, issued 4/27/2019.

Dear Sir or Madam:

I am submitting a request for waiver of the 60 day rule and this letter of appeal regarding E-rate FY 2019 funding request for Internet Services, on the grounds that, a ministerial/clerical error occurred where the wrong monthly recurring cost (MRC) was data entered onto the Form 471.

Appellant Name:	e2e Exchange, LLC
Applicant Name:	The Arch Community School
471 Application Number:	191007616
Billed Entity Number:	17014837
FRN:	1999008998
Service Provider:	Charter Communications

The issue in this case boils down simply to this: The under-funding was based on a ministerial/clerical error that occurred during the drafting and filing of the Form 471. The Arch Community School completed the FY2019 Form 470 process from 12/18/18 to 1/15/19. Charter Communications for 1 Gig at a monthly recurring cost of \$1,200.00 was the winning vendor with price as the most heavily weighted criteria. However, during data entry of the Form 471 the older invoice for the high speed internet (account 8345-78-001-5551983-8199) and not the new invoice for the 1G fiber optics (8345-78-001-6105821-0526) was accidentally used to data enter the Form 471 application. This falls under the category of a ministerial/clerical error and a correction should be allowed per the Bishop Perry Order. Based on the Bishop Perry Order, we request FRN be funded per the documents supplied and USAC actions remain consistent with this order.

Given that the under- funding in this case was based on merely an administrative error, and all costs are listed on the original documentation, the Parties respectfully request that the FCC process this Letter of Appeal and approve the full funding commitment for The Arch Community. The under- funding for an administrative error places a particular hardship on a school district such as The Arch Community that otherwise should have been approved for and received full E-rate funding for its application.

We respectfully request that you overturn the under-funded decision and allow full funding of this FRN. Thank you for reviewing this appeal. Please use the contact information below.

Tiffany Bullion, Director of Operations, e2e Exchange, LLC, PO Box 451, Syracuse, NY 13206, Tel. 315.422.7608, Fax 866.283.9332, [trb@e2eexchange.com](mailto:trb@e2eexchange.com)

Sincerely,  
**E2e Exchange, LLC**

Tiffany Bullion  
Director of Operations

CC:

Enclosures:

-Copy of invoice for account 8345-78-001-5551983-8199  
-Copy of invoice for account 8345-78-001-6105821-0526