

11/18/19

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

Letter of Appeal – Request for Waiver

To Whom It May Concern:

Entity & BEN	The Arch Community School, #17014837
Contact Person	Tiffany Bullion
Contact Information	
Mailing Address -	PO Box 451 Syracuse NY 13206
Phone Number -	315-422-7608
Email Address -	trb@e2eexchange.com
Funding Year	2019
Application Type & Application Number	Form 471 Application Number #191007616
FRN	#1999008998
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 4/27/2019.

E-rate filing is not the primary role of staffers at The Arch Community School 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.

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.

As such, we are filing this request for waiver in order for the FCC appeal to be reviewed and the underfunded FRN 1999008998 be fully funded per the documentation. Not to consider fully funding the internet services for The Arch Community School 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