



## Santa Clara County Office of Education

Mary Ann Dewan, Ph.D.  
County Superintendent of Schools

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

Letter of Appeal for CC Docket No. 02-6 seeking a waiver of the invoice deadlines for the Lakeside Joint School District (LJSD), to be able to extend the invoice deadlines of Form 471 application 171046590, FRN 1799106328.

Lakeside Joint School District (LJSD) was approved for funding of FRN 1799106328 and filed and certified associated Form 486 on July 12, 2017 (see Exhibit 1 Y20 LJSD Forms 471 and 486.pdf). October 16, 2017, LJSD emailed to Comcast, at [erate\\_funding@comcast.com](mailto:erate_funding@comcast.com), a completed Comcast Reimbursement Request form (see Exhibit 2 Y20 LJSD Comcast Reimbursement Request Form\_17-18.xlsx), which is required for Comcast to process invoicing. LJSD received an email from Comcast on January 19, 2018, requesting the Comcast Reimbursement Request form. On January 24, 2018, LJSD emailed the form to Comcast at both [erate\\_funding@comcast.com](mailto:erate_funding@comcast.com) and [Erate\\_Funding@comcast.com](mailto:Erate_Funding@comcast.com), and received delivery receipt notification (see Exhibit 3 Emails to Comcast.pdf).

On March 2, 2018, LJSD received another email from Comcast requesting the Comcast Reimbursement Request form. On March 6, 2018, the form was emailed again to both addresses from both LJSD and from the Santa Clara County Office of Education email accounts. LJSD did not receive any other communications from Comcast.

Over the Summer, Susan Ady, the EPC account administrator and the person responsible for E-Rate at LJSD resigned from LJSD to take a job with the County. Unfortunately, no one was setup to replace her on the EPC account and she was the only user with access.

As the Invoice Deadline approached the FRN Status Tool was used to check the invoice status of the FRN. When it was noticed that the FRN had not been invoiced, an attempt was made to login to the LJSD EPC E-rate portal to request the Invoice Deadline extension. Unfortunately the old password had expired and Susan Ady was not available to change the password.

Lakeside Joint School District is a small rural district of 86 students which cannot afford to bring broadband Internet Access to their students without the support of E-rate funding. Lakeside Joint School District filed all the required documentation for the funding and invoicing per the E-rate rules but Comcast did not complete the invoicing. LJSD tried to get the invoice deadline extended before the October 29, 2018 deadline but was unable to request it because they did not have access to the EPC portal. Please grant the waiver so that LJSD can



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work with Comcast to resolve whatever the issue is they are having with getting the FRN invoiced, so that Lakeside Joint School District can get the funding they need to support their students.

Sincerely,

Steven Mitome  
Santa Clara County Office of Education  
1290 Ridder Park Drive, MC253  
San Jose, CA 95131-2304  
408-453-6897  
408-453-6730 fax  
[steven\\_mitome@SCCOE.org](mailto:steven_mitome@SCCOE.org)