Petition for Reconsideration

CC Docket # 02-6

Applicant Name: **DETROIT PUBLIC LIBRARY**
Entity Number: **130943**
Funding Year: 2018-2019

CONTACT INFORMATION

Contact Person: VICTOR IBEGBU
Contact Information
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APPLICANT INFORMATION

Appellant Name: Victor Ibegbu
Applicant Name: DETROIT PUBLIC LIBRARY BEN:30943
Application #: 181039871

Denied Waiver Application for Funding Year 2018 Form 471 "Late-Filed FCC Form 471 Application"

This is a petition for Reconsideration of the Denied Waiver Appeal
FOR
DETROIT PUBLIC LIBRARY

Waiver/Appeal Request Confirmation #: 20180614863809427
Waiver/Appeal Request Date #: June 14, 2018
Funding Year 2018 Form 471 Late-Filed FCC Form 471 Application
USAC Form 471 Cert Date: June 12, 2018
Form 471Number: 181039871
Form 470 Numbers: 180025102
Funding Year: 2018-2019
Billed Entity Name: Detroit Public Library
BEN: 130943
FRNs: 1899083877
Service Provider: Merit Network Inc.
SPINs: 143004331

Reason for Waiver/Appeal Denial:

FCC Form 471 filing window deadline where petitioners failed to present special circumstances justifying waiver of FCC rules. [1]

[1] FCC_Notification_Oct31

CERTIFICATION DATE: 06/12/2018

Rationale for Request

Detroit Public Library attempted to file 2018 Form 471 during the E-rate filling window, but was unsuccessful as a result of EPC system errors. These errors were reported to USAC customer service but were not resolved until the filing window was closed. On June 12, 2018, upon resolution of EPC errors, DPL submitted FCC Form 471 #181039871[2] and subsequently filed an appeal for a waiver with number 20180614863809427[3].

Process that Led to the Error

Detroit Public Schools (DPS) changed their name and entity number in USAC EPC without notifying Detroit Public Library prior to the Form 471 filing window. This affected all entities associated with the school district. As a result of this change, Detroit Public Library had no assigned school district within the USAC EPC system. Without this information, the system created an error on any attempt to complete Form 471. The error message did not indicate the cause.

Please note that DPL successfully filed the corresponding USAC Form 470 within the required Form 470 window without any issues. When the change was made by DPS, and DPL was not notified, USAC EPC no longer recognized DPS as a related entity for DPL.

Circumstances to Consider

Prior to March 22, 2018, Detroit Public Library made several attempts to file 2018 USAC Form 471 but was unsuccessful.

Filing attempts on March 22, 2018

- At 2:48 p.m., DPL made attempt to file form 471 number 181039562 with identifier DPL_471_2018_IA. This attempt failed as a result of USAC EPC error ("Error Evaluating UI Expression") [4]
- At 3:16 p.m., DPL made attempt to file form 471 number 181039715 with identifier DPL_471_2018_IA_Merit. This attempt failed as a result of USAC EPC error ("Error Evaluating UI Expression") [3]
- At 3:41 p.m., DPL made attempt to file form 471 number 181039871 with identifier DPL_471_2018_IABF. This attempt failed as a result of USCA EPC error ("No related entities error")
- At 3:44 p.m., DPL called CSB and spoke to Shelly Rodger. Case number 231519 was assigned [5]
- At 9:37 p.m., DPL made attempt to file form 471 number 181041407 with identifier DPL_471_2018_IABF_Merit. This attempt failed as a result of USCA EPC error ("Error Evaluating UI Expression") [6]

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[2] DPL 2018 FCC Form 471 #181039871
[3] DPL_471_2018_Waiver
[4] DPL_471_2018_Error
[5] DPL_USAC_Case #231519_471_error
[6] DPL_471_2018_Error_Evaluating UI Expression

Timeline of phone calls to CSB on March 22, 2018

- At 9:43 p.m., DPL contacted CSB and spoke to Sarah Hickey. Case number 231761 was assigned [7]
- At 10:39 p.m., DPL contacted CSB again to report that the move to another school district was not working and DPL was still not able to complete the 471 application. DPL was told that issue was being escalated. [6]
- At 11:20 p.m., DPL contacted CSB again to check on the status of the escalation.
- At 11:49 p.m., CSB called back DPL, stating that issue is actively being worked on and that issue has been moved to USAC system engineers [6]
- At 12:10 a.m., CSB noted that the window was now closed and that they will continue to work on resolving the issue but noted on the case the steps for filing FCC Waiver/Appeal

Subsequent Communications with USAC

- On March 28, 2018, USAC engineer, Ehtasham Ejaz, contacted DPL that the issue was resolved but a quick check showed that it was not resolved [8]
- USAC Systems Engineers continued to work on this issue and DPL was told that we would be notified once the issue was resolved
- On May 31, 2018, USAC Program Analyst, LaTia Cook, emailed me to let me know that she was assigned to work on the issue. In her email, she wanted me to confirm whether BEN # 130944 – DETROIT PUBLIC SCHOOLS COMMUNITY DISTRICT is an actual ESA school district and identify the actual school district DPL is located in. [9]
- After several back and forth emails, this issue was finally resolved on June 12, 2018 and then our USAC Form 471 #181039871 was filed.

The evidence presented above shows the late filed application was not the fault of Detroit Public Library, but due to the cumbersome, inflexible web portal and the requirement that libraries, for purposes of filing, must be associated with school districts in their service area. The fact that a library cannot manage the information pertinent to its viable USAC application is highly problematic.

The Detroit Public Library serves Detroit and the surrounding community in Wayne County, Michigan. Detroit is a fiscally depressed community with a population of approximately 665,965. The median household income in Detroit is $28,099. Wayne County has a population of approximately 1,820,584 with a per capita income of $22,125. The loss of $794,554.27 will have a negative effect on the library services provided to the residents of Detroit. These will include, but are not limited to, all Internet based services, all literacy programs and all after school programs.

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[7] Phone Call_Record_March 22_2018
[8] DPL_USAC_Case #231761_471_error_EJ_Note
[9] Email_Communication

On behalf of the Detroit Public Library, I ask that a Request for Reconsideration of Waiver/Appeal be granted. By granting this Waiver/Appeal, the USAC could be directed to review DETROIT PUBLIC LIBRARY'S application for funding during the Funding Year 2018.

Please be advised that I have handled E-rate filing for the Detroit Public Library for more than 10 years, and have a great deal of experience in this process. This the only time I have encountered an error that prevented me from filing any application during the given window. I spent a significant amount of time on the phone trying to resolve a system error issue that was no fault of my own.

Your favorable consideration in this matter is greatly appreciated.

Victor Ibegbu
Assistant Director for Information Systems
Detroit Public Library
313-481-1349

Federal Communications Commission
Washington, D.C. 20554

Memo

To: Victor Ibegbu, for
Detroit Public Library

From: Ryan B. Palmer, Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission

Date: November 2, 2018

Re: DA 18-1100, released October 31, 2018

The attached Public Notice contains the Bureau's decision on your appeal. It may be referenced in the future by its document number and release date: DA 18-1100, released October 31, 2018.

If the Bureau has granted your appeal, please contact the Universal Service Administrative Company (USAC) at 1-888-203-8100 for more information regarding your application. Please submit any information to USAC that the order may require. Once USAC has reviewed your application related to the issues resolved in the attached Public Notice, you will receive a revised funding commitment decision letter.

If the Bureau has dismissed or denied your appeal and you would like to seek reconsideration of that decision, the deadline to file a petition for reconsideration or application for review by the full Commission is 30 days from the release date. *See* 47 CFR §§ 1.106, 1.115. We encourage you to file your petition for reconsideration or application for review electronically using the Commission's electronic comment filing system (ECFS) at https://www.fcc.gov/ecfs/filings. On your filing, please include a reference to the proceeding, CC Docket No. 02-6.

PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: https://www.fcc.gov
TTY: 1-888-835-5322

DA 18-1100
Released: October 31, 2018

STREAMLINED RESOLUTION OF REQUESTS RELATED TO ACTIONS BY THE UNIVERSAL SERVICE ADMINISTRATIVE COMPANY

CC Docket No. 02-6
WC Docket No. 06-122

Pursuant to our procedure for resolving requests for review, requests for waiver, and petitions for reconsideration of decisions related to actions taken by the Universal Service Administrative Company (USAC) that are consistent with precedent (collectively, Requests), the Wireline Competition Bureau (Bureau) grants, dismisses, or denies the following Requests.[1] The deadline for filing petitions for reconsideration or applications for review concerning the disposition of any of these Requests is 30 days from release of this Public Notice.[2]

Schools and Libraries (E-Rate)

CC Docket No. 02-6
Dismissed[3]

Walsingham Academy, FL, Application No. 161052245, Request for Waiver, CC Docket No. 02-6 (filed June 13, 2018)

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[1] *See Streamlined Process for Resolving Requests for Review of Decisions by the Universal Service Administrative Company*, CC Docket Nos. 96-45 and 02-6, WC Docket Nos. 02-60, 06-122, 08-71, 10-90, 11-42, and 14-58, Public Notice, 29 FCC Rcd 11094 (WCB 2014). Section 54.719(b) of the Commission's rules provides that any person aggrieved by an action taken by a division of USAC, after first seeking review at USAC, may seek review from the Commission. Section 54.719(c) of the Commission's rules provides that parties seeking waivers of the Commission's rules shall seek review directly from the Commission. 47 CFR § 54.719(b)-(c). In this Public Notice, we have reclassified as Requests for Waiver those appeals seeking review of a USAC decision that appropriately should have requested a waiver of the Commission's rules. Similarly, we have reclassified as Requests for Review those appeals seeking a waiver of the Commission's rules but are actually seeking review of a USAC decision.

[2] *See* 47 CFR §§ 1.106(f), 1.115(d); *see also* 47 CFR § 1.4(b)(2) (setting forth the method for computing the amount of time within which persons or entities must act in response to deadlines established by the Commission).

[3] *See, e.g., Request for Review of a Decision of the Universal Service Administrator by La Canada Unified School District; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 30 FCC Rcd 4729, 4729, para. 2 (WCB 2015) (dismissing an appeal that properly belongs before USAC pursuant to Commission rules).

Dismissed as Moot[4]

New Braunfels Public Library, TX, Application No. 181042570, Request for Waiver, CC Docket No. 02-6 (filed Apr. 19, 2018)

Dismissed as Moot[5]

Bryan City School District, OH, Application No. 555220, Request for Review, CC Docket No. 02-6 (filed Jan. 15, 2008)

Christopher Columbus High School, FL, Application No. 897750, Request for Review, CC Docket No. 02-6 (filed Apr. 6, 2015)

City University, TN, Application No. 171042466, Request for Review, CC Docket No. 02-6 (filed May 29, 2018)

Clay County Public Library, KY, Application No. 171042182, Request for Review, CC Docket No. 02-6 (filed July 13, 2018)

ENA Services, LLC (City University), TN, Application No. 171042466, Request for Review, CC Docket No. 02-6 (filed May 23, 2018)

McBride Memorial Library, PA, Application No. 979109, Request for Review, CC Docket No. 02-6 (filed May 18, 2016)

South Dearborn Community School Corporation, IN, Application No. 171031202, Request for Review, CC Docket No. 02-6 (filed May 24, 2018)

Wilbur Mills Education Service Coop, AR, Application No. 1042266, Request for Review, CC Docket No. 02-6 (filed Apr. 13, 2018)

Windsor Northwest Supervisory Union 50, VT, Application No. 982931, Request for Review, CC Docket No. 02-6 (filed Mar. 21, 2016)

Dismissed as Moot[6]

Central Arkansas Christian Schools, AR, Application No. 161039042, Request for Waiver, CC Docket No. 02-6 (filed May 17, 2018)

Central Catholic High School, WV, Application No. 171016554, Request for Waiver, CC Docket No. 02-6 (filed July 30, 2018)

Gloucestar County Library, PA, Application No. 161041356, Request for Waiver, CC Docket No. 02-6 (filed Aug. 20, 2018)

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[4] *See, e.g., Requests for Review of Decisions of the Universal Service Administrator by Integrity Communications (Brooks Consolidated Independent School District)*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 27 FCC Rcd 7994, 7995, para. 1 (WCB 2012) (dismissing appeals as moot for which the applicant subsequently withdrew the applicable funding requests).

[5] *See, e.g., Requests for Review and/or Requests for Waiver of the Decisions of the Universal Service Administrator by Al-Noor High School et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 27 FCC Rcd 8223, 8224, para. 2 (WCB 2012) (dismissing as moot requests for review where USAC had taken the action the petitioner requested and issued new decisions approving funding).

[6] *See, e.g., Requests for Review of Decisions of the Universal Service Administrator by Diversified Computer Solutions, Inc.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 27 FCC Rcd 5250, 5251, para. 3 (WCB 2012) (dismissing appeals as moot where invoicing records demonstrate that the entity was fully compensated for the funding it requested and all submitted invoices were funded).

Marian Catholic High School, IL, Application No. 171003268, Request for Waiver, CC Docket No. 02-6 (filed July 6, 2018)

Marlboro County School District, SC, Application No. 910978, Request for Waiver, CC Docket No. 02-6 (filed July 12, 2018)

Menominee Independent School District, MI, Application Nos. 161048773, 161048870, Request for Waiver, CC Docket No. 02-6 (filed Apr. 4, 2018)

St. Patrick Elementary School, NE, Application No. 171019183, Request for Waiver, CC Docket No. 02-6 (filed Apr. 11, 2018)

Wayne County Public Library, OH, Application No. 161002094, Request for Waiver, CC Docket No. 02-6 (filed July 16, 2018)

Dismissed on Reconsideration[7]

Digital Design Communications (Oakland Unified School District), CA, Application No. 751744, Petition for Reconsideration, CC Docket No. 02-6 (filed July 2, 2018)

Match Charter Public School, MA, Application Nos. 161010827, 161014505, Request for Waiver, CC Docket No. 02-6 (filed Mar. 28, 2018)

Granted[8]

28 Day Competitive Bidding Rule[9]

San Antonio Independent School District, TX, Application No. 1033060, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Aug. 28, 2018)

San Antonio Independent School District, TX, Application No. 1001065, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Aug. 28, 2018)

San Antonio Independent School District, TX, Application No. 161034893, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Sept. 13, 2018)

San Antonio Independent School District, TX, Application No. 161028321, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Sept. 13, 2018)

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[7] *See, e.g.*, *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Allan Shivers Library et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order and Order on Reconsideration, 29 FCC Rcd 10356, 10357, para. 2 (WCB 2014) (dismissing petitions for reconsideration that fail to identify any material error, omission, or reason warranting reconsideration, and rely on arguments that have been fully considered and rejected by the Bureau within the same proceeding). The school does not give any reason why we should consider the new information they now provide. 47 CFR § 1.106(c).

[8] We remand these applications to USAC and direct USAC to complete its review of the applications and issue a funding commitment or a denial based on a complete review and analysis, no later than 90 calendar days from the release date of this Public Notice. In remanding these applications to USAC, we make no finding as to the ultimate eligibility of the services or the petitioners' applications. We also waive sections 54.507(d) and 54.514(a) of the Commission's rules and direct USAC to waive any procedural deadline that might be necessary to effectuate our ruling. *See* 47 CFR § 54.507(d) (requiring non-recurring services to be implemented by September 30 following the close of the funding year); 47 CFR § 54.514(a) (codifying the invoice filing deadline).

[9] *See, e.g.*, *Application for Review of the Decision of the Universal Service Administrator by Aberdeen School District et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 22 FCC Rcd 8757 (2007) (granting waivers of violations of the 28-day rule when the applicants only missed the deadline by one to three days, thereby allowing their requests for services to be competitively bid for a meaningful period of time, and there was no evidence of waste, fraud or abuse).

San Antonio Independent School District, TX, Application No. 161035017, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Sept. 13, 2018)

Failure to Consider All Bids - Applicant Selected Lowest-Cost Provider[10]

Florence County School District 3, NC, Application No. 895000, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Apr. 16, 2014)

Granting Additional Time to Respond to USAC's Request for Information[11]

Ridgefield Academy, CT, Application No. 171032449, Request for Waiver, CC Docket No. 02-6 (filed Dec. 14, 2017)

Grant on Reconsideration – Appeal Filing Deadline[12]

Brevard County School District, FL, Application No. 161005862, Petition for Reconsideration, CC Docket No. 02-6 (filed Mar. 7, 2018)

Invoice Deadline Extension Requests[13]

Camera Corner, Inc. (Waupun School District), WI, Application No. 1018895 et al., Request for Waiver, CC Docket No. 02-6 (filed Apr. 13, 2017)

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[10] *See, e.g.*, *Requests for Review of Decisions of the Universal Service Administrator by Allendale County School District et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 26 FCC Rcd 6109, 6115-17, paras. 10-12 (WCB 2011) (granting waiver of requirement that price of E-Rate supported services be the primary factor in bid evaluation where petitioner selected the least expensive responsive bid for E-Rate eligible services).

[11] *See, e.g.*, *Requests for Review of the Decision of the Universal Service Administrator by Alpaugh Unified School District et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 22 FCC Rcd 6035 (2007); *Requests for Review of Decisions of the Universal Service Administrator by Ben Gamla Palm Beach et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 29 FCC Rcd 1876 (WCB 2014) (granting requests for review of applicants that had been denied funding because they failed to respond to USAC's request for information within the USAC-specified time frame). Consistent with precedent, we also find good cause exists to waive sections 54.720(a) and (b) of the Commission's rules, which requires that petitioners file their appeals or waiver requests within 60 days of an adverse USAC decision. *See Requests for Review and/or Waiver of Decisions of the Universal Service Administrator by ABC Unified School District et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 26 FCC Rcd 11019, 11019, para. 2 (WCB 2011) (*ABC Unified Order*) (granting waivers of filing deadline for appeals because they submitted their appeals or waiver requests within a reasonable period of time after receiving actual notice of USAC's adverse decision); 47 CFR §§ 54.720(a), (b).

The Bureau previously granted Ridgefield Academy's request for waiver but later determined that the petitioner inserted the wrong application number in the filing. We now grant the request noting the correct application number.

[12] *See, e.g.*, *Petitions for Reconsideration by Callisburg Independent School District; School and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order and Order on Reconsideration, 28 FCC Rcd 9459, 9461, para. 5 (Wireline Comp. Bur. 2013) (granting petition for reconsideration where, upon reconsideration of the record, we do not find that the evidence supports our previous determination); *ABC Unified School District Order et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 26 FCC Rcd 11019, para. 2 (WCB 2011) (ABC Unified School District Order) (waiving the filing deadline for petitioners that submitted their appeals to the Commission or USAC only a few days late or because they submitted their appeals within a reasonable period of time after receiving actual notice of USAC's adverse decision).

[13] *See, e.g.*, Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, DA 18-188 (WCB Feb. 26, 2018) 2018, 33 FCC Rcd 2042 (granting a limited waiver of the Commission's invoicing rules to allow certain E-Rate program applicants and service providers to submit invoices beyond the 120-day extension already received and allowed by the Commission's rules).

Ministerial and/or Clerical Errors[14]

Bannockburn School District #106, IL, Application No. 171007261, Request for Waiver, CC Docket No. 02-6 (filed Aug. 9, 2018)

Bishop Heelan Catholic Schools, IA, Application No. 171042187, Request for Waiver, CC Docket No. 02-6 (filed Apr. 18, 2018)

Dollarway Public School District, AR, Application No. 161049861, Request for Waiver, CC Docket No. 02-6 (filed Nov. 2, 2017)

Harrisburg Community Unit School District #3, IL, Application No. 171005681, Request for Waiver, CC Docket No. 02-6 (Sept. 27, 2018)

Jean Piaget Academy, FL, Application No. 171012269, Request for Waiver, CC Docket No. 02-6 (Oct. 11, 2018)

Sacred Heart Catholic School/ICC, NM, Application No. 171036745, Request for Waiver, CC Docket No. 02-6 (Sept. 14, 2018)

Ministerial and/or Clerical Errors—Service Substitution[15]

Lake Washington School District, WA, Application No. 161013370, Request for Waiver, CC Docket No. 02-6 (July 5, 2018)

Service Substitution[16]

South Dakota Department of Education, SD, Application No. 161060091, Request for Review, CC Docket No. 02-6 (filed Aug. 21, 2018)

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[14] *See, e.g., Requests for Waiver and Review of Decisions of the Universal Service Administrator by Achieve Career Preparatory Academy, et al,; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 26 FCC Rcd 10254, 10255 text accompany n. 9 (WCB 2011) (permitting applicant to correct a mischaracterization of a recurring charge as a non-recurring charge); *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ann Arbor Public Schools et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 25 FCC Rcd 17319, 17319-20, para. 2 & nn. 9, 24 (WCB 2010) (permitting applicant to correct a date on its FCC Form 471 or a mischaracterization of the recipient of service); *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Joseph Jingoli & Son, Inc., et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 22 FCC Rcd 19227, 19228-29, paras. 3-4 (WCB 2007) (granting petitioners' requests to correct their mistaken cancellations of funding requests). Consistent with precedent, we also find good cause exists for all petitioners to waive sections 54.720(a) and (b) of the Commission's rules, which requires that petitioners file their appeals or waiver requests within 60 days of an adverse USAC decision; *Requests for Review and/or Waiver of Decisions of the Universal Service Administrator by ABC Unified School District et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 26 FCC Rcd 11019, 11019, para. 2 (WCB 2011) (*ABC Unified Order*) (granting waivers of filing deadline for appeals because they submitted their appeals or waiver requests within a reasonable period of time after receiving actual notice of USAC's adverse decision).

[15] *See, e.g., Requests for Review of a Decision of the Universal Service Administrator by West Virginia Department of Education; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 26 FCC Rcd 14306, 14307, para. 3 (WCB 2011) (allowing a correction when there was an inadvertent ministerial or clerical error while requesting a service substitution).

[16] *See, e.g., Requests for Review of Decisions of the Universal Service Administrator by Beaufort County School District, South Carolina et al.*; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 29 FCC Rcd 3124, 3125, para. 3 (2014) (granting service substitution appeals when the petitioners missed USAC's deadline for service substitution requests but complied with the Commission's requirements for service substitutions under 47 C.F.R. § 54.504(d) and had a reasonable explanation for missing the deadline).

Timely Filed Invoice[17]

Nex-Tech Inc. (Barnes Unified School District 223), KS, Application No. 944066, Request for Review, CC Docket No. 02-6 (filed Aug. 2, 2016)

Timely Filed Invoice Deadline Extension[18]

Caldwell Parish School District, LA, Application No. 1040004, Request for Review, CC Docket No. 02-6 (filed Jan. 31, 2017)

Unable to timely File Awaiting USAC Action[19]

Cathedral Catholic High School, FL, Application No. 161034800, Request for Waiver, CC Docket No. 02-6 (filed June 21, 2018)

Waiver of Appeal- or Waiver-Filing Deadline[20]

Raton Public Schools, NM, Application No. 181000654, Request for Waiver, CC Docket No. 02-6 (filed Oct. 4, 2018)

Waiver of Service Delivery Deadline[21]

A B C Unified School District, CA, Application No. 161006823, Request for Waiver, CC Docket No. 02-6 (filed June 18, 2018)

Castro Valley Unified School District, CA, Application No. 161048653, Request for Waiver, CC Docket No. 02-6 (filed Sept. 14, 2018)

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[17] We find, based on the record before us, that Nex-Tech Inc. timely filed an FCC Form 474 service provider invoice (SPI) that was overlooked by USAC. The service provider, therefore, should be given the opportunity by USAC to refile its invoice on remand. In this instance, we waive any procedural deadlines, including the invoice deadline, that might be necessary to effectuate our ruling. *See supra* note 8.

[18] We find, based on the record before us, that Caldwell Parish School District timely filed an invoice deadline extension request. Although the request did not include the specific funding request number (FRN), it contained enough specificity for USAC to determine what the filer wanted and to extend the invoice deadline, especially considering there was only one FRN that had not yet been processed. *See, e.g., Pasadena Unified School District, Schools and Libraries Universal Service Support Mechanism,* CC Docket No. 02-6, Order, 21 FCC Rcd 2116 (WCB 2006) (noting that while the burden of timely and accurately filing rests with the applicant, USAC retains an obligation to conduct a reasonable inquiry into the filings and materials that USAC itself has in its possession when making its determinations). In this instance, we waive any procedural deadlines, including the invoice deadline, that might be necessary to effectuate our ruling. *See supra* note 8.

[19] *See, e.g., Ada Public Library Order*, 32 FCC Rcd at 1911, para. 6 (granting a waiver for applicants who were unable to file a BEAR form because they were waiting for USAC to provide an FCC Form 498 ID or personal identification number (PIN) at the time of the deadline).

[20] *See, e.g., Requests for Review and/or Waiver of Decisions of the Universal Service Administrator by ABC Unified School District et al.; Schools and Libraries Universal Service Support Mechanism,* CC Docket No. 02-6, Order, 26 FCC Rcd 11019, para. 2 (WCB 2011) (waiving the filing deadline for petitioners that submitted their appeals to the Commission or USAC only a few days late). We make no finding on the underlying issues in this appeal and remand the application back to USAC for a determination on the merits. *See supra* note 8.

[21] *See, e.g., Buffalo City School District, Federal-State Joint Board on Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association,* Order, CC Docket Nos. 96-45 and 97-21, 17 FCC Rcd 11881, 11884, para. 8 (WCB 2002) (waiving the Commission's rules to allow an extension of the deadline for service implementation when applicants demonstrated they were unable to complete service delivery because of time limitations imposed by late-issued funding commitments).

Metropolitan School District of Mount Vernon, IN, Application No. 161044673, Request for Waiver, CC Docket No. 02-6 (filed May 21, 2018)

Muncie Municipal Schools, IN, Application No. 161030141, Request for Waiver, CC Docket No. 02-6 (filed Sept. 14, 2018)

Tukwila School District, WA, Application No. 161005581, Request for Waiver, CC Docket No. 02-6 (filed July 23, 2018)

Warrick County School Corporation, IN, Application No. 161050880, Request for Waiver, CC Docket No. 02-6 (filed July 24, 2018)

Waiver of Special Construction Service Delivery Deadline[22]

Orange County Public Schools, VA, Application No. 161045819, Request for Waiver, CC Docket No. 02-6 (July 20, 2018)

Partial Grant

Unable to timely File Awaiting USAC Action[23]

Annapolis Area Christian School et al., MD et al., Application No. 1018895 et al., Request for Waiver, CC Docket No. 02-6 (filed Feb. 8, 2017)

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[22] *See Requests for Waiver of the Decisions of the Universal Service Administrator by Grants/Cibola County School District and Jemez Pueblo Tribal Consortium*, CC Docket No. 02-6, Order, DA 18-1060, 4, para. 8 (WCB 2018) (waiving the special construction service delivery deadline because the applicant was unable to complete implementation for reasons beyond the service provider's control and the petitioner made good faith efforts to comply with Commission rules and procedures). Orange County Public Schools was unable to complete implementation for reasons beyond its control (i.e., inclement weather, permitting delays, and delayed funding disbursements) and made good faith efforts to comply with Commission rules and procedures (e.g., timely filing service delivery deadline extension requests with USAC). Accordingly, we waive the special construction service delivery deadline and direct USAC to set a new service delivery deadline of June 30, 2019 and adjust any associated administrative deadlines accordingly.

[23] We grant this appeal for Toledo Christian School, Application No. 1018971, which had an FCC Form 498 pending at the time of the invoice deadline. *See, e.g., Ada Public Library Order*, 32 FCC Rcd at 1911, para. 6 (granting a waiver for applicants who were unable to file a BEAR form because they were waiting for USAC to provide an FCC Form 498 ID or personal identification number (PIN) at the time of the deadline). However, we deny the rest of the requests for waiver filed together on Feb. 8, 2017. *See, e.g., Requests for Waiver of Decisions of the Universal Service Administrator by Ada School District et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 31 FCC Rcd 3834, 3835, para. 7 (WCB 2016) (denying requests for waiver of the Commission's invoice extension rule for petitioners that failed to demonstrate extraordinary circumstances justifying a waiver); *see also Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870, 8966, para. 240 (2014) (establishing that it is generally not in the public interest to waive the Commission's invoicing rules absent extraordinary circumstances); 47 CFR § 54.514.

Denied

Invoice Deadline Extension Requests[24]

ACE Preparatory, SC, Application No. 161034847, Request for Waiver, CC Docket No. 02-6 (filed Apr. 30, 2018, supplemented May 2, 2018)

CABLExpress Corporation (Martinsville School District), VA, Application No. 161027356, Request for Waiver, CC Docket No. 02-6 (filed Mar. 2, 2018)

Hillel Day School, FL, Application No. 161050057, Request for Waiver, CC Docket No. 02-6 (filed June 15, 2018)

Regional Office of Administration #26 Fulton/Hancock/McDonough/Schuyler, IL, Application No. 1034362, Request for Waiver, CC Docket No. 02-6 (filed Mar. 14, 2018)[25]

Southern California Edison (Corporation for Education Network Initiatives in California), CA, Application No. 161059378, Request for Waiver, CC Docket No. 02-6 (filed Aug. 22, 2018)

Warrensville Heights City Schools, SC, Application No. 161053084, Request for Waiver, CC Docket No. 02-6 (filed June 11, 2018)

Late-Filed FCC Form 471 Applications[26]

Alma Public School District, AR, Application No. 181043291, Request for Waiver, CC Docket No. 02-6 (filed Sept. 13, 2018)

Detroit Public Library, MI, Application No. 181039871, Request for Waiver, CC Docket No. 02-6 (filed June 14, 2018)

North Lawndale College Preparatory Charter High School, IL, Application No. 181043248, Request for Waiver, CC Docket No. 02-6 (filed Sept. 28, 2018)

Potosi R-III School District, MO, Application No. 181043337, Request for Waiver, CC Docket No. 02-6 (filed Oct. 3, 2018)

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[24] *See, e.g., Requests for Waiver of Decisions of the Universal Service Administrator by Ada School District et al.; Schools and Libraries Universal Service Support Mechanism,* CC Docket No. 02-6, Order, 31 FCC Rcd 3834, 3835, para. 7 (WCB 2016) (denying requests for waiver of the Commission's invoice extension rule for petitioners that failed to demonstrate extraordinary circumstances justifying a waiver); *see also Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870, 8966, para. 240 (2014) (establishing that it is generally not in the public interest to waive the Commission's invoicing rules absent extraordinary circumstances); 47 CFR § 54.514.

[25] We also deny the request for an extension of the service delivery deadline for Regional Office of Administration #26 Fulton/Hancock/McDonough/Schuyler. The petitioner failed to show that the extension was required because of circumstances beyond the service provider's control and failed to demonstrate it made significant efforts to secure the necessary extensions in a timely manner. *See, e.g., Request for Review/Waiver of the Decision of the Universal Service Administrator by Accelerated Charter et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 29 FCC Rcd 13652, 13653, para. 3 (WCB 2014) (denying late-filed extensions of the deadline for service implementation when applicants failed to demonstrate they were unable to complete implementation on time for reasons beyond the service providers' control and failed to make significant efforts to secure the necessary extensions in a timely manner).

[26] *See, e.g., Requests for Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 25 FCC Rcd 9256, 9261-62, para. 13 (2010) (denying requests for waiver of the FCC Form 471 filing window deadline where petitioners failed to present special circumstances justifying waiver of our rules).

Rise Preparatory Mayoral Academy, RI, Application No. 181043272, Request for Waiver, CC Docket No. 02-6 (filed Sept. 5, 2018)

Rocky Mountain Lutheran High School, CO, No Application No., Request for Waiver, CC Docket No. 02-6 (filed Apr. 4, 2018)

Sesser Public School Library, IL, Application No. 181040494, Request for Waiver, CC Docket No. 02-6 (filed Apr. 25, 2018)

State of Rhode Island and Providence Plantations, RI, Application No. 181042473, Request for Waiver, CC Docket No. 02-6 (filed July 7, 2018)

The Guidance Charter School, CA, Application No. 181043048, Request for Waive, CC Docket No. 02-6 (filed July 10, 2018)

The Link School, MN, Application No. 181043276, Request for Waiver, CC Docket No. 02-6 (filed Sept. 7, 2018)

The Passport School Inc., FL, Application No. 181043336, Request for Waiver, CC Docket No. 02-6 (filed Oct. 2, 2018)

Tri-Valley Free Public Library, PA, Application No. 181043141, Request for Waiver, CC Docket No. 02-6 (July 26, 2018, supplemented Aug. 6, 2018)[27]

Ministerial and/or Clerical Errors[28]

Good Shepherd School, NY, Application No. 181034458, Request for Waiver, CC Docket No. 02-6 (Sept. 18, 2018)

Untimely-Filed Appeals or Waiver Requests[29]

Darien School District 61, IL, Application No. 967964, Request for Waiver, CC Docket No. 02-6 (filed Oct. 5, 2016)

Hudson County Schools of Technology, NJ, Application No. 171045331, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Aug. 24, 2018)

Inner City Educational Foundation Public Schools Consortium, CA, Application No. 847805, Request for Review and/or Waiver, CC Docket No. 02-6 (filed July 7, 2014)

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[27] Applicant's December 2017 filing – Application No. 171049905 – was also filed outside the filing window, i.e., before the window opened.

[28] *See, e.g., Requests for Waiver and Review of Decisions of the Universal Service Administrator by Assabet Valley Regional Vocational District; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 27 FCC Rcd 1924, 1925, para. 1 (WCB 2012) (finding petitioners had not demonstrated good cause to justify waivers permitting changes to the applicants' E-Rate applications). Here, Good Shepherd School failed to provide documentation showing that the service provider and monthly rate were selected prior to the filing of its FCC Form 471 application.

[29] *See, e.g., Requests for Review of Decisions of the Universal Service Administrator by Agra Public Schools I-134 et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 25 FCC Rcd 5684 (WCB 2010); *Requests for Waiver or Review of Decisions of the Universal Service Administrator by Bound Brook School District et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 29 FCC Rcd 5823 (WCB 2014) (denying requests for review and/or waiver on the grounds that the petitioners failed to 1) submit their appeals either to the Commission or to USAC within 60 days; or failed to submit their waiver requests to the Commission within 60 days as required by the Commission's rules; and 2) did not show special circumstances necessary for the Commission to waive the deadline).

Riverdale Academy, LA, Application No. 181012432, Request for Waiver, CC Docket No. 02-6 (filed Sept. 13, 2018)

Springfield Commonwealth Academy, MA, Application No. 171022433, Request for Waiver, CC Docket No. 02-6 (filed Sept. 26, 2018)

Stargate Charter School, CO, No Application No. for FY2017, Application No. 181042506, Request for Waiver, CC Docket No. 02-6 (filed Oct. 9, 2018)

St. Matthew School, TX, Application No. 171046774, Request for review, CC Docket No. 02-6 (filed July 16, 2018)

Trout Creek School District #6, MT, Application No. 181023163, Request for Waiver, CC Docket No. 02-6 (filed Oct. 2, 2018)

Unite Private Networks, LLC (Omaha Public School District), NE, Application No. 1009247, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Aug. 3, 2018)

Perspectives Charter School, AZ, Application No. 636194, Request for Review and/or Waiver, CC Docket No. 02-6 (filed May 1, 2009)

USD 493 Columbus, KS, Application No. 171027938, Request for Review and/or Waiver, CC Docket No. 02-6 (filed Sept. 6, 2018)

Contribution Methodology

WC Docket No. 06-122

Denied

Request for Waiver of FCC Form 499-A Revision Deadline[30]

Everstream GLC Holding Company, LLC, Request for Review of Universal Service Administrator Decision and Request for Waiver of Deadline for Filing Revisions to FCC Form 499-A, WC Docket No. 06-122 (filed Aug. 21, 2018)

For additional information concerning this Public Notice, please contact James Bachtell in the Telecommunications Access Policy Division, Wireline Competition Bureau, at james.bachtell@fcc.gov or (202) 418-2694.

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[30] *See, e.g., Universal Service Contribution Methodology; Petition for Waiver of Universal Service Fund Rules by Outfitter Satellite, Inc., WC Docket No. 06-122, Order, 28 FCC Rcd 13358 (WCB 2013) (finding that alleged mistakes by Outfitter's accounting firm and internal accounting staff were not adequate grounds for waiver); Universal Service Contribution Methodology; Request for Review of a Decision of the Universal Service Administrator by IP Telecom Group, Inc., WC Docket No. 06-122, Order, 26 FCC Rcd 11213 (WCB 2011); Universal Service Contribution Methodology; Federal-State Joint Board on Universal Service; Requests for Review of Decisions of Universal Service Administrator by Airband Communications, Inc. et al.*, WC Docket No. 06-122, CC Docket No. 96-45, Order, 25 FCC Rcd 10861 (WCB 2010) (denying requests for deadline waivers where claims of good cause amounted to no more than simple negligence, errors by the petitioner, or circumstances squarely within the petitioner's control).

OMB 3060-0806
FCC Form 471

Approval by OMB
November 2015

Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname	DPL_2018_471_IABF	**Application Number**	181039871
Funding Year	2018	**Category of Service**	Category 1

Billed Entity

DETROIT PUBLIC LIBRARY
5201 WOODWARD AVE DETROIT MI 48202 - 4007
313-481-1300
usfgroup@detroitpubliclibrary.org

Billed Entity Number	130943
FCC Registration Number	0009727504
Applicant Type	Library
Holiday/Summer Contact Information	313 269 2145

Contact Information

Victor Ibegbu
313-481-1349
vibegbu@detroitpubliclibrary.org

Entity Information

Library Entity - Details

BEN	Name	FSCS Code	Locale Code	Urban/ Rural	Total Square Footage	School District Name	School District BEN	Library Attributes
130943	DETROIT PUBLIC LIBRARY		999	Urban	631039	DETROIT PUBLIC SCHOOLS COMMUNITY DISTRICT	130944	Main Branch; Public Library

Library Entity - Annexes

Library BEN	Library Name	Annex Name
130943	DETROIT PUBLIC LIBRARY	Bowen Branch
130943	DETROIT PUBLIC LIBRARY	Campbeell Branch
130943	DETROIT PUBLIC LIBRARY	Chandler Park Branch
130943	DETROIT PUBLIC LIBRARY	Chaney Branch
130943	DETROIT PUBLIC LIBRARY	Chase Branch
130943	DETROIT PUBLIC LIBRARY	Conely Branch
130943	DETROIT PUBLIC LIBRARY	Douglass Branch for Specialized Services
130943	DETROIT PUBLIC LIBRARY	Duffield Branch
130943	DETROIT PUBLIC LIBRARY	Edison Branch

Library BEN	Library Name	Annex Name
130943	DETROIT PUBLIC LIBRARY	Elmwood Park Branch
130943	DETROIT PUBLIC LIBRARY	Franklin Branch
130943	DETROIT PUBLIC LIBRARY	Hubbard Branch
130943	DETROIT PUBLIC LIBRARY	Jefferson Branch
130943	DETROIT PUBLIC LIBRARY	Knapp Branch
130943	DETROIT PUBLIC LIBRARY	Lincoln Branch
130943	DETROIT PUBLIC LIBRARY	Monteith Branch
130943	DETROIT PUBLIC LIBRARY	Parkman Branch
130943	DETROIT PUBLIC LIBRARY	Redford Branch
130943	DETROIT PUBLIC LIBRARY	Sherwood Forest Branch
130943	DETROIT PUBLIC LIBRARY	Robert and Rose Skillman Branch
130943	DETROIT PUBLIC LIBRARY	Wilder Branch
130943	DETROIT PUBLIC LIBRARY	DPL Service Bldg

Related Entity Information

Discount Rate

Associated School District Full-time Enrollment	Associated School District NSLP Count	Associated School District NSLP Percentage	Library Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
50766	50765	100.0%	Urban	90%	85%	10%

Funding Request for FRN #1899083877

Funding Request Nickname: DPL_2018_471_IABF_FRN

Service Type: Data Transmission and/or Internet Access

Agreement Information - Contract

Contract Number

Establishing FCC Form 470 180025102

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Award Date March 28, 2018

How many bids were received for this contract? 5

What is the service start date? July 01, 2018

Account Number

Service Provider Merit Network, Inc. (SPN: 143004331)

Based on State Master Contract? No

Based on a multiple award schedule? No

Includes Voluntary Extensions? No

Remaining Voluntary Extensions

Total Remaining Contract Length

What is the date your contract expires for the current term of the contract? June 30, 2021

Document Name	Document Description
DPL 2018 Signed Agreement and Quote.pdf	Internet Access agreement for 2018-2021

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative

Merit proposes connecting the Detroit Public Librarys Main Library to the Merit backbone node via Merit-owned fiber provisioned at 10 Gbps for the purpose of providing Internet Access with bundled basic firewall at service levels ranging from 1 Gbps to 10 Gbps to Main Library. Also to connect each of Detroit Public Library branch locations to Main Library via Merit leased fiber at 1 Gbps or 10 Gbps for the purposes of providing transport. Costs provided in this proposal are for the one-time and ongoing costs of the end-to-end managed services requested. Merit and its subcontractors are responsible for all costs associated with installation of service provider equipment and other service provider infrastructure required to deliver the services to the library sites.

Line Item # 1899083877.001

Product and Service Details

Purpose Internet access service that includes a connection from any applicant site directly to the Internet Service Provider

Function Fiber

Type of Connection Ethernet

Bandwidth Speed

Upload Speed 10.0 Gbps

Download Speed 1.0 Gbps

Burstable Speed 10.0

Connection Information

Does this include firewall services? Yes

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a "Wide area network")? Yes

Is this a direct connection to a single school, library or a NIF for Internet access? No

Cost Calculation for FRN Line Item # 1899083877.001

Monthly Cost	
Monthly Recurring Unit Cost	$27,466.67
Monthly Recurring Unit Ineligible Costs	- $0.00
Monthly Recurring Unit Eligible Costs	= $27,466.67
Monthly Quantity	x 1
Total Monthly Eligible Recurring Costs	= $27,466.67
Months of Service	x 12
Total Eligible Recurring Costs	= $329,600.04

One-Time Cost	
One-time Unit Cost	$7,500.00
One-time Ineligible Unit Costs	- $0.00
One-time Eligible Unit Cost	= $7,500.00
One-time Quantity	x 1
Total Eligible One-time Costs	= $7,500.00
Summary	
Total Eligible Recurring Costs	$329,600.04
Total Eligible One-time Costs	+ $7,500.00
Pre-Discount Extended Eligible Line Item Cost	= $337,100.04

Recipients of Services

BEN	Name
130943	DETROIT PUBLIC LIBRARY

Line Item # 1899083877.002

Product and Service Details

Purpose Data Connection between two or more sites entirely within the applicant's network

Function Fiber

Type of Connection Ethernet

Bandwidth Speed

Upload Speed 1.0 Gbps

Download Speed 1.0 Gbps

Burstable Speed 10.0

Connection Information

Does this include firewall services? Yes

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a "Wide area network")? Yes

Is this a direct connection to a single school, library or a NIF for Internet access? No

Cost Calculation for FRN Line Item # 1899083877.002

Monthly Cost	
Monthly Recurring Unit Cost	$27,916.67
Monthly Recurring Unit Ineligible Costs	- $0.00
Monthly Recurring Unit Eligible Costs	= $27,916.67
Monthly Quantity	x 1
Total Monthly Eligible Recurring Costs	= $27,916.67
Months of Service	x 12
Total Eligible Recurring Costs	= $335,000.04

One-Time Cost	
One-time Unit Cost	$9,579.00
One-time Ineligible Unit Costs	- $0.00
One-time Eligible Unit Cost	= $9,579.00
One-time Quantity	x 22
Total Eligible One-time Costs	= $210,738.00

Summary	
Total Eligible Recurring Costs	$335,000.04
Total Eligible One-time Costs	+ $210,738.00
Pre-Discount Extended Eligible Line Item Cost	= $545,738.04

Recipients of Services

BEN	Name
130943	DETROIT PUBLIC LIBRARY

FRN Calculation for FRN #1899083877

Monthly Charges	
Total Monthly Recurring Charges	$55,383.34
Total Monthly Ineligible Charges	- $0.00
Total Monthly Eligible Charges	= $55,383.34
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= $664,600.08

One-Time Charges	
Total One-Time Charges	$218,238.00
Total Ineligible One-Time Charges	- $0.00
Total Eligible Pre-Discount One-Time Charges	= $218,238.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	$664,600.08
Total Eligible Pre-Discount One-Time Charges	+ $218,238.00
Total Pre-Discount Charges	= $882,838.08
Discount Rate	90%
Funding Commitment Request	= $794,554.27

Connectivity Questions

Per Entity Basis Questions

Entity Name DETROIT PUBLIC LIBRARY **Entity Number** 130943

What is the total bandwidth speed from this location (including non E-rate supported services)?

Download Speed	1000.00	**Download Speed Units**	Mbps
Upload Speed	1000.00	**Upload Speed Units**	Mbps
What is the predominant connection type coming to this location?	Fiber	**How sufficient is the quality of the Wi-Fi at this location?**	Mostly
What are your biggest barriers to having a robust internal network in your classrooms at this location?	Physical structure or layout of building(s)	**If Other, please specify**	

Certifications

I certify that the entities listed in this application are eligible for support because they are libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools, including, but not limited to, elementary, secondary schools, colleges, or universities.
I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	$882,838.08
Total funding commitment request amount on this FCC Form 471	$794,554.27
Total applicant non-discount share of the eligible amount	$88,283.81
Total budgeted amount allocated to resources not eligible for E-rate support	$400,000.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	$488,283.81
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assited you in locating funds needed to pay your non-discounted share?	No

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.
I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.
I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.
I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.
I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

Title:	Act Asst Dir for Info Sys	**Name:**	Victor Ibegbu
Phone:	313-481-1349	**Email:**	vibegbu@detroitpubliclibrary.org
Address:	5201 WOODWARD AVE DETROIT MI 48202 - 4007	**Employer:**	Victor Ibegbu

Certified Timestamp

12-Jun-2018 13:38:38 EDT

June 12, 2018

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Waiver request – CC Docket Nos. 02-6

USAC Form 471 Cert Date: June 12, 2018
Form 471Number: 181039871
Form 470 Numbers: 180025102
Funding Year: 2018-2019
Billed Entity Name: Detroit Public Library
BEN: 130943
FRNs: 1899083877
Service Provider: Merit Network Inc.
SPINs: 143004331

Contact Person: Victor Ibegbu
Assistant Director for Information Systems, Detroit Public Library
Phone: 313-481-1349
E-mail: vibegbu@detroitpubliclibrary.org

Request for Waiver: Detroit Public Library (DPL) is asking for a waiver for 2018 filing window. Application could not be filed in window for the reasons below:

Form 471 was filed outside of window due to EPC technical problems.
Explanation: Multiple EPC system errors prevented Detroit Public Library from completing the 471 filing within the given window.

Background
Detroit Public Library made several attempts to file USAC 471 for 2018/2019 but was prevented by the system for multiple reasons. These issues were reported to technical support of USAC who acknowledged those to be system errors. Multiple cases were opened on this. The case numbers are: 231519, 231761 and 234052. These issues were later escalated to USAC system engineers but the error was not rectified until after the filing window was closed. We are asking for a waiver for our 471 application with number 181039871.

Summary of Appeal

After multiple attempts by March 22, 2018 to complete Detroit Public Library's 2018 Form 471, (Form 471 numbers: 181039715, 181041407, 181039871 and 181039562. See Attachment 1) DPL initiated a case with the technical support of USAC. The initial assigned case number was #231519**.** See Attachment 2.

On a follow-up on March 23, 2018, another case was opened for the same issue (Case number 231761. Please see Attachment 3). This time, the persistent error was an "Error Evaluating UI expression." See Attachment 1. We continued to experience these issues way past the March 28th update by USAC engineer.

DPL again followed up on this case and was informed that our issues had been escalated to USAC's systems engineers. Case number 234052 was assigned. See Attachment 4.

On June 11, 2018, DPL was notified by USAC's systems engineers that the issues were resolved. DPL subsequently completed the pending USAC Form 471 application #181039871.

Request

We ask that the Commission to grant us a waiver on our 2018 USAC Form 471 application with number 181039871 because of the EPC system error which prevented the Detroit Public Library from completing the process in the given window.

The inability to file our 2018 Form 471 was as result of USAC's EPC system error and no fault of Detroit Public Library. The denial of these funds will severely impact the library's finances and ability to deliver new technology services to our patrons.

We appreciate your time and consideration.

Sincerely,

(submitted electronically via ECFS)

Victor Ibegbu
Assistant Director for Information Systems, Detroit Public Library
Phone: 313-481-1349
E-mail: vibegbu@detroitpubliclibrary.org

Attachments below:

Att 1 – DPL_EPC_Error_Screenshots_1
Att 2 - DPL_USAC_Case #231519_471_error
Att 3 - DPL_USAC_Case #231761_471_error
Att 4 - DPL_USAC_Case #234052_471_error

DPL_EPC_Error_Screenshots_1

My Landing Page | Tasks | Tasks | Mail - vibegbu@detr | #231761 - 471 error | New tab

https://portal.usac.org/suite/tempo/reports/view/YB7oUg

News | Tasks (4) | Records | Reports | Actions | Applian

Universal Service Administrative Co.

Us | Help

Welcome, DETROIT PUBLIC LIBRARY!

Notifications

Notification Type: Please select a value

Funding Year: -- Select a Funding Year --

Status: All / Generated / Not Generated

Notification	Description	Issued Date	Generated By	Generated On
No items available				

My Entities

Entity	Entity Number	City	State	Zip Code
DETROIT PUBLIC LIBRARY	130943	DETROIT	MI	48202

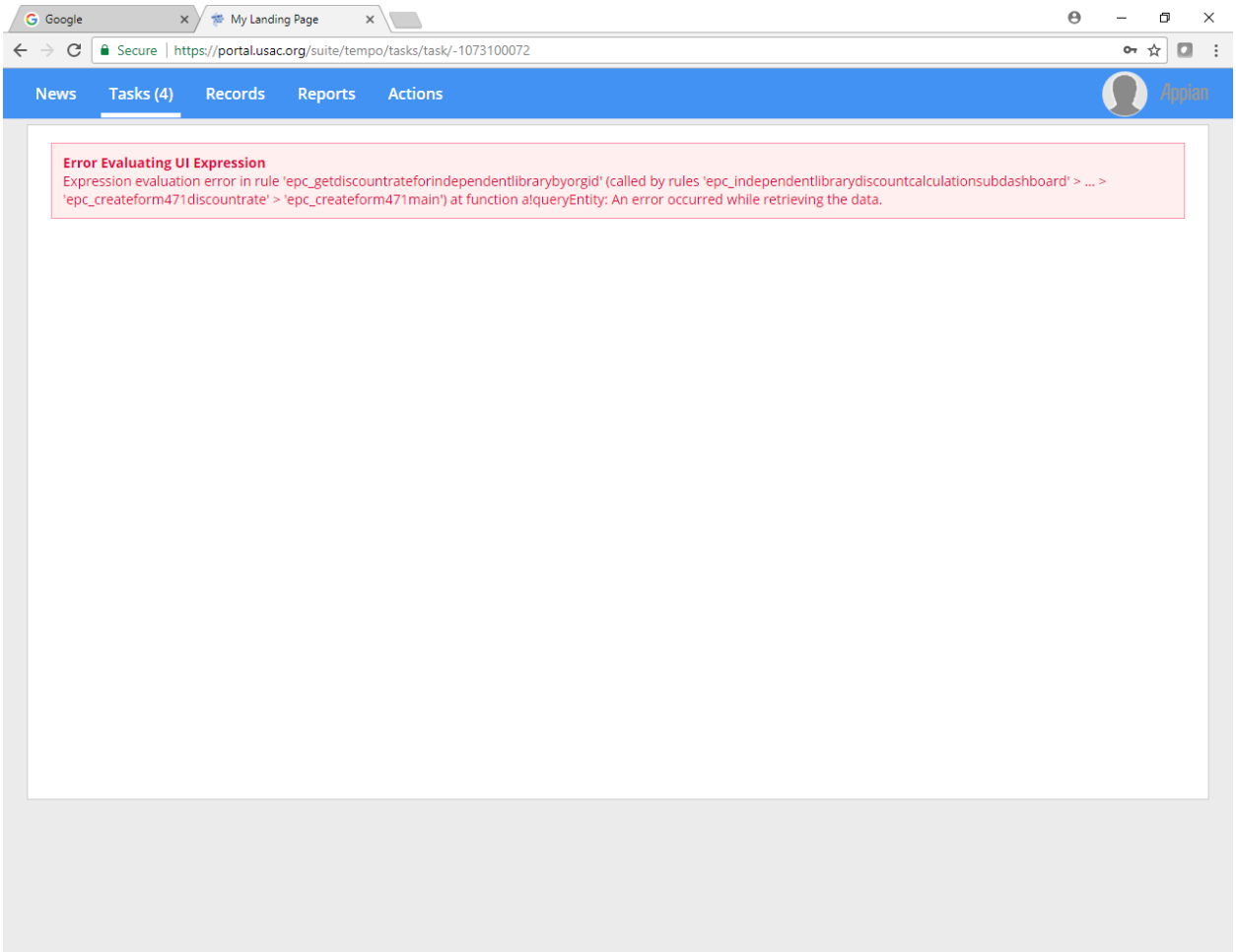
My Tasks

Name	Received	Status	Deadline
Create FCC Form 471 - 181039715 - DPL_471_2018_IA_Merit	3/22/2018 3:16 PM EDT	Assigned	
Create FCC Form 471 - 181041407 - DPL_2018_471_IABF_Merit	3/22/2018 9:37 PM EDT	Assigned	
Create FCC Form 471 - 181039871 - DPL_2018_471_IABF	3/22/2018 3:41 PM EDT	Accepted	
Create FCC Form 471 - 181039562 - DPL_471_2018_IA	3/22/2018 2:48 PM EDT	Accepted	

Customer Service Cases

Case ID	Topic	Nickname	Status	Date Created

DPL_EPC_Error_Screenshots_2



My Landing Page | Universal Service Admir

https://portal.usac.org/suite/tempo/actions/item/k0BDUvg2DtnG8p1r6BS020b8xIiyeZn9Ez4HzQ-Tu9BCJV1g4WencOWoDTrEKV3wOJRsJz

News | Tasks (3) | Records | Reports | Actions | Appian

SAVE DRAFT

FCC Form 471 - Funding

DETROIT PUBLIC LIBRARY (BEN: 181041407

Last Saved: 3/22/2018 9:37 PM EDT

Basic Information | Entity In | Information | Certify

We've completed this section of the form based on inf formation is incorrect, or you wish to change the information, please update your profile first by going t Actions menu. If you do not have access to Manage Organization, please contact your applicant entity's account administrator or create a customer service case to request updates to your applicant entity's profile.

Error Evaluating UI Expression

Expression evaluation error in rule 'epc_getdiscountrateforindependentlibrarybyorgid' (called by rules 'epc_independentlibrarydiscountcalculationsubdashboard' > ... > 'epc_createform471discountrate' > 'epc_createform471main') at function a!queryEntity: An error occurred while retrieving the data.

OK

Related Entity(ies) Information

There are no Related Entity(s) for your organization

FCC Form 471 Help

Show Help

BACK | DISCARD FORM | SAVE & CONTINUE

Records / Customer Service Cases

#231519

Summary News Related Actions

Case Details

Topic	FCC Form 471 - Form Questions	**Created By**	User has been deactivated
Status	Closed	**Created On**	3/22/2018 3:44 PM EDT
Priority	Medium	**Organization**	DETROIT PUBLIC LIBRARY
Inquiry Type	Phone		

Case Description

Description On my form 471 I get the error message 'no related entities'.

Case Artifacts

Documents

Name	Uploaded By	Upload Date
No items available		

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
No items available		

Case Contact

Case Contact Victor Ibegbu

Records / Customer Service Cases

#234052 - Error screenshot

UPDATE CASE

Summary News Related Actions

Case Details

Topic	System Problem Report - FCC Form 471	**Form Type**	FCC Form 471
Status	Pending	**Form Number**	181039562
Priority	Medium	**Created By**	User has been deactivated
Inquiry Type	Phone	**Created On**	4/16/2018 9:53 AM EDT
		Organization	DETROIT PUBLIC LIBRARY

Case Description

Description The applicant called to help with troubleshooting Form 471 181039562. The error message he is receiving is "no Form 470" and UI Error.

Case Artifacts

Documents

Name	Uploaded By	Upload Date
Error_234052_b	Victor Ibegbu	4/16/18 10:00 AM
Error_234052	Victor Ibegbu	4/16/18 9:56 AM

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
No items available		

Case Contact

Case Contact Victor Ibegbu

Records / Customer Service Cases

#231761 - 471 error

Summary News Related Actions

Case Details

Topic	System Problem Report - FCC Form 471	**Form Type**	FCC Form 471
Status	Closed	**Form Number**	181039562
Priority	Medium	**Created By**	User has been deactivated
Inquiry Type	Phone	**Created On**	3/22/2018 9:58 PM EDT
		Organization	DETROIT PUBLIC LIBRARY

Case Description

Description When I click on my 471 from tasks I receive an error. How do I complete my form?

Case Artifacts

Documents

Name	Uploaded By	Upload Date
Screenshots_2	Victor Ibegbu	3/22/18 10:09 PM
Screenshots	Victor Ibegbu	3/22/18 10:00 PM

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
USAC	Victor; Thank you for your patience. I just left you a VM as well. The issue you were facing during your 471 filling has been resolved and you should be able to complete your 471 application now. Please let me know if you encounter any other issue. Thank you; EJ	3/28/2018 1:56 PM EDT
USAC	Victor, Here are the instructions for submitting a waiver request to the FCC. Parties that are seeking a waiver of FCC rules or that have filed an appeal with USAC and received a decision may, if they choose, appeal USAC's decision to the FCC. You must submit your appeal to the FCC within 60 days of the date when USAC issued the decision. On all communications with the FCC, be sure to reference the Docket No. 02-6. 1. Go to https://www.fcc.gov/ecfs. Alternatively, from https://www.fcc.gov, click "ECFS" in the center of the page under "Access Now". 2. A page containing a filing search will open. At the top of the page, click "Submit a Filing". 3. In the "Proceedings" field, make sure to enter 02-6. 4. When filing a waiver request, be sure to choose WAIVER from the "Type of Filing" field. If you are filing an appeal, you may choose APPEAL. 5. Complete the rest of the fields as they are relevant. There are certain fields that are not applicable, such as the "Report Number" or "Bureau ID Number." 6. Upload your written letter of appeal or request	3/23/2018 12:10 AM EDT

User	Note	Date
	for waiver, and any other applicable documentation. In general, your appeal or waiver request should include: 1. Your contact information and the entity name and entity number, or service provider name and SPIN of the organization you represent; 2. A label of appeal or waiver request; 3. Information regarding the USAC decision being appealed and a copy of USAC's decision, if applicable; 4. A statement setting forth the party's interest in the matter presented for review; 5. A full statement of relevant, material facts with supporting affidavits and documentation; 6. The question presented for review, with reference, where appropriate, to the relevant Commission rule, order or statutory provision; and 7. A statement of the relief sought and the relevant statutory or regulatory provision pursuant to which such relief is sought. Electronic appeals will be considered filed on a business day if they are received at any time before 12:00 AM ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193 or via email at ecfshelp@fcc.gov. For the FCC's rules on appeals, you may also see Sections 54.719-54.72: http://www.ecfr.gov/cgi-bin/text-idx?SID=8f7ceac17a80d1abd798eb37023b5b75&node=pt47.3.54&rgn=div5#se47.3.54_1719 Additional information on filing appeals to USAC and the FCC is found on the Appeals page of the USAC website: http://usac.org/about/about/program-integrity/appeals.aspx	

Case Contact

Case Contact Victor Ibegbu

DPL_EPC_Error_Screenshots_1

My Landing Page | Tasks | Tasks | Mail - vibegbu@detr | #231761 - 471 error | New tab

https://portal.usac.org/suite/tempo/reports/view/YB7oUg

News | Tasks (4) | Records | Reports | Actions | Applian

Universal Service Administrative Co.

Us | Help

Welcome, DETROIT PUBLIC LIBRARY!

Notifications

Notification Type: Please select a value

Funding Year: -- Select a Funding Year --

Status: All / Generated / Not Generated

Notification	Description	Issued Date	Generated By	Generated On
No items available				

My Entities

Entity	Entity Number	City	State	Zip Code
DETROIT PUBLIC LIBRARY	130943	DETROIT	MI	48202

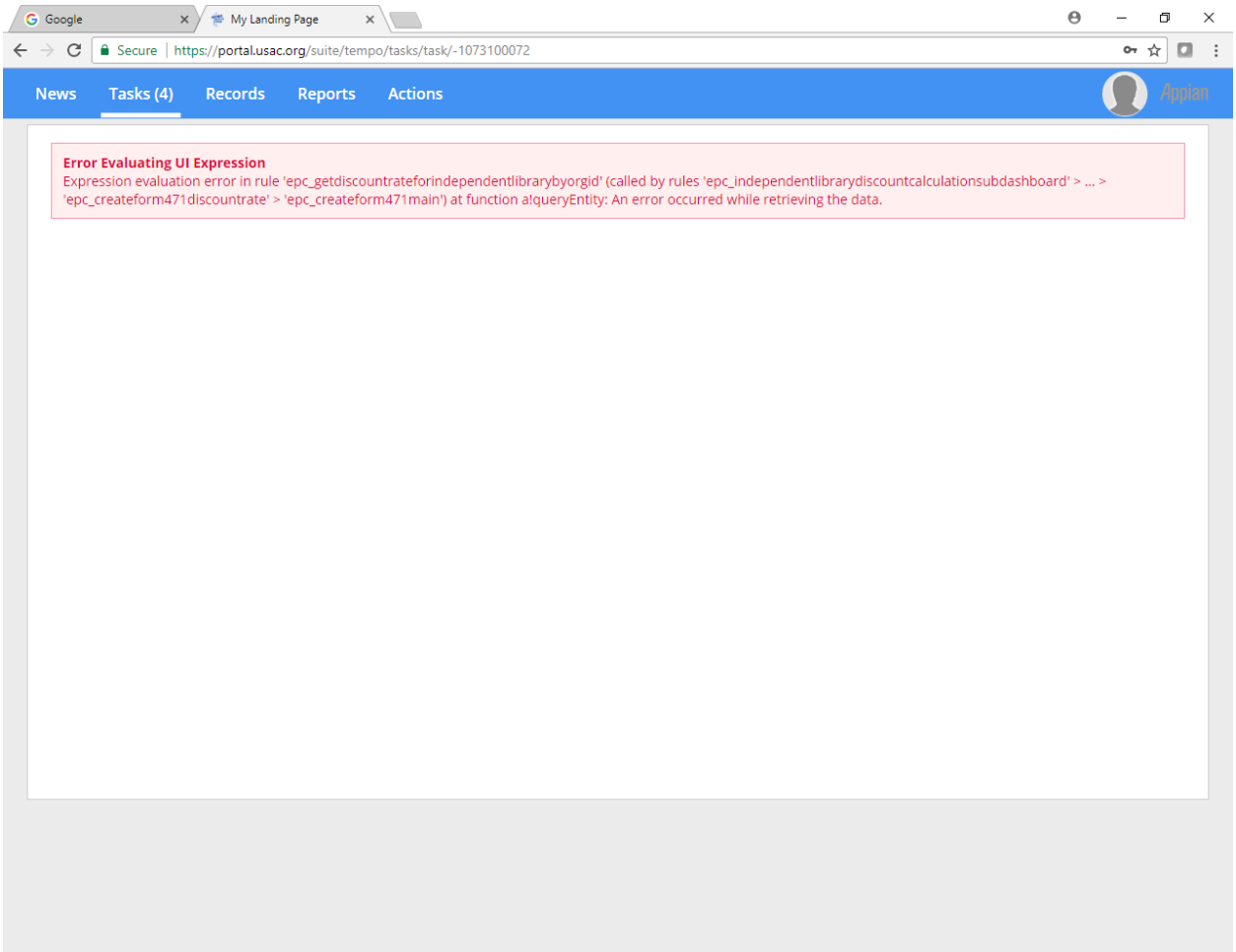
My Tasks

Name	Received	Status	Deadline
Create FCC Form 471 - 181039715 - DPL_471_2018_IA_Merit	3/22/2018 3:16 PM EDT	Assigned	
Create FCC Form 471 - 181041407 - DPL_2018_471_IABF_Merit	3/22/2018 9:37 PM EDT	Assigned	
Create FCC Form 471 - 181039871 - DPL_2018_471_IABF	3/22/2018 3:41 PM EDT	Accepted	
Create FCC Form 471 - 181039562 - DPL_471_2018_IA	3/22/2018 2:48 PM EDT	Accepted	

Customer Service Cases

Case ID	Topic	Nickname	Status	Date Created

DPL_EPC_Error_Screenshots_2



#231519

Case Details

Topic	FCC Form 471 - Form Questions	**Created By**	User has been deactivated
Status	Closed	**Created On**	3/22/2018 3:44 PM EDT
Priority	Medium	**Organization**	DETROIT PUBLIC LIBRARY
Inquiry Type	Phone		

Case Description

Description On my form 471 I get the error message 'no related entities'.

Case Artifacts

Documents

Name	Uploaded By	Upload Date
No items available		

Attachments

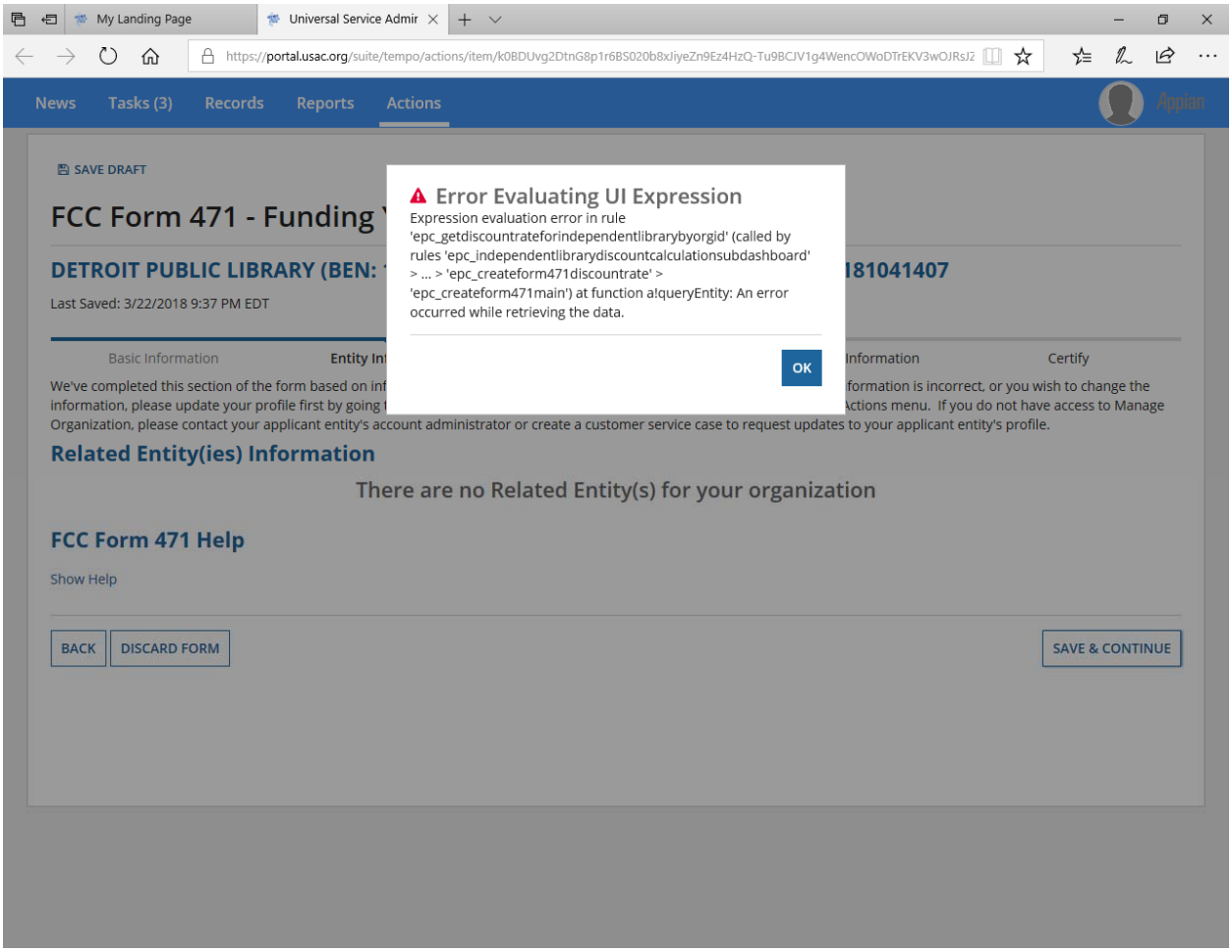
Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
No items available		

Case Contact

Case Contact Victor Ibegbu


My Landing Page
Universal Service Admir
https://portal.usac.org/suite/tempo/actions/item/k0BDUvg2DtnG8p1r6BS020b8xJiyeZn9Ez4HzQ-Tu9BCJV1g4WencOWoDTrEKV3wOJRsJz
News
Tasks (3)
Records
Reports
Actions
Appian
SAVE DRAFT
FCC Form 471 - Funding
DETROIT PUBLIC LIBRARY (BEN:
181041407
Last Saved: 3/22/2018 9:37 PM EDT
Basic Information
Entity In
Information
Certify
We've completed this section of the form based on inf
information, please update your profile first by going t
formation is incorrect, or you wish to change the
Actions menu. If you do not have access to Manage
Organization, please contact your applicant entity's account administrator or create a customer service case to request updates to your applicant entity's profile.
Related Entity(ies) Information
There are no Related Entity(s) for your organization
FCC Form 471 Help
Show Help
BACK
DISCARD FORM
SAVE & CONTINUE
Error Evaluating UI Expression
Expression evaluation error in rule 'epc_getdiscountrateforindependentlibrarybyorgid' (called by rules 'epc_independentlibrarydiscountcalculationsubdashboard' > ... > 'epc_createform471discountrate' > 'epc_createform471main') at function a!queryEntity: An error occurred while retrieving the data.
OK

Detail for Victor Ibegbu: 313–269–2145

Voice, continued

Date	Time	Number	Rate	Usage Type	Origination	Destination	Min.	Airtime Charges	Long Dist/ Other Chgs	Total
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3/22	5:35P	734–833–8605	Peak	PlanAllow	Northville MI	Incoming CL	1	--	--	--
3/22	9:43P	888–203–8100	Off–Peak	N&W	Plymouth MI	Toll–Free CL	27	--	--	--
3/22	10:39P	888–203–8100	Off–Peak	N&W	Canton MI	Toll–Free CL	12	--	--	--
3/22	11:20P	888–203–8100	Off–Peak	N&W	Plymouth MI	Toll–Free CL	11	--	--	--
3/22	11:49P	785–832–0207	Off–Peak	N&W	Plymouth MI	Incoming CL	22	--	--	--
3/23	8:57A								--	--
3/23	8:58A								--	.50
3/23	9:30A								--	--
3/23	10:02A								--	.25
3/23	10:27A								--	.25
3/23	10:27A								--	9.00
3/23	11:50A								--	.75
3/23	1:33P								--	.50
3/23	2:21P								--	.25
3/23	5:54P								--	.50
3/26	11:01A								--	--
3/26	11:05A								--	1.00
3/26	2:00P								--	--
3/26	2:02P								--	--
3/26	2:22P								--	.75
3/26	2:50P								--	--
3/26	3:02P								--	--
3/26	3:31P								--	.75
3/26	3:50P								--	--
3/26	4:02P								--	.25
3/26	4:02P								--	.25

Records / Customer Service Cases

#231761 - 471 error

Summary News Related Actions

Case Details

Topic	System Problem Report - FCC Form 471	**Form Type**	FCC Form 471
Status	Closed	**Form Number**	181039562
Priority	Medium	**Created By**	User has been deactivated
Inquiry Type	Phone	**Created On**	3/22/2018 9:58 PM EDT
		Organization	DETROIT PUBLIC LIBRARY

Case Description

Description When I click on my 471 from tasks I receive an error. How do I complete my form?

Case Artifacts

Documents

Name	Uploaded By	Upload Date
Screenshots_2	Victor Ibegbu	3/22/18 10:09 PM
Screenshots	Victor Ibegbu	3/22/18 10:00 PM

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
USAC	Victor; Thank you for your patience. I just left you a VM as well. The issue you were facing during your 471 filling has been resolved and you should be able to complete your 471 application now. Please let me know if you encounter any other issue. Thank you; EJ	3/28/2018 1:56 PM EDT
USAC	Victor, Here are the instructions for submitting a waiver request to the FCC. Parties that are seeking a waiver of FCC rules or that have filed an appeal with USAC and received a decision may, if they choose, appeal USAC's decision to the FCC. You must submit your appeal to the FCC within 60 days of the date when USAC issued the decision. On all communications with the FCC, be sure to reference the Docket No. 02-6. 1. Go to https://www.fcc.gov/ecfs. Alternatively, from https://www.fcc.gov, click "ECFS" in the center of the page under "Access Now". 2. A page containing a filing search will open. At the top of the page, click "Submit a Filing". 3. In the "Proceedings" field, make sure to enter 02-6. 4. When filing a waiver request, be sure to choose WAIVER from the "Type of Filing" field. If you are filing an appeal, you may choose APPEAL. 5. Complete the rest of the fields as they are relevant. There are certain fields that are not applicable, such as the "Report Number" or "Bureau ID Number." 6. Upload your written letter of appeal or request	3/23/2018 12:10 AM EDT

User	Note	Date
	for waiver, and any other applicable documentation. In general, your appeal or waiver request should include: 1. Your contact information and the entity name and entity number, or service provider name and SPIN of the organization you represent; 2. A label of appeal or waiver request; 3. Information regarding the USAC decision being appealed and a copy of USAC's decision, if applicable; 4. A statement setting forth the party's interest in the matter presented for review; 5. A full statement of relevant, material facts with supporting affidavits and documentation; 6. The question presented for review, with reference, where appropriate, to the relevant Commission rule, order or statutory provision; and 7. A statement of the relief sought and the relevant statutory or regulatory provision pursuant to which such relief is sought. Electronic appeals will be considered filed on a business day if they are received at any time before 12:00 AM ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193 or via email at ecfshelp@fcc.gov. For the FCC's rules on appeals, you may also see Sections 54.719-54.72: http://www.ecfr.gov/cgi-bin/text-idx?SID=8f7ceac17a80d1abd798eb37023b5b75&node=pt47.3.54&rgn=div5#se47.3.54_1719 Additional information on filing appeals to USAC and the FCC is found on the Appeals page of the USAC website: http://usac.org/about/about/program-integrity/appeals.aspx	

Case Contact

Case Contact Victor Ibegbu

RE: 2018 Window - Error Evaluating UI Expression when clicking a Form 471 task

LaTia Cook <LaTia.Cook@usac.org>

Mon 6/18/2018 1:12 PM

To:Victor Ibegbu <vibegbu@detroitpubliclibrary.org>;

Cc:Ehtasham Ejaz <Ehtasham.Ejaz@usac.org>;

Hi Victor,

Thank you for the update. I also received your voicemail and at this time, there is nothing additional that needs to be done. I'm happy to have helped resolve your concern.

Please feel free to reach out to me if needed.

Thank you.

Tia Cook
Program Analyst
Schools & Libraries
(202) 263-1654
USAC | lcook@usac.org

From: Victor Ibegbu [mailto:vibegbu@detroitpubliclibrary.org]
Sent: Monday, June 18, 2018 1:07 PM
To: LaTia Cook <LaTia.Cook@usac.org>
Subject: Re: 2018 Window - Error Evaluating UI Expression when clicking a Form 471 task

Hi LaTia
Thank you again for all your help. I was able to complete our 2018/19 471 application (471# 181039871 with FRN# 1899083877)
As previously suggested, I have also completed FCC Waiver request (Conformation # 20180614863809427)
Please let me know if there are anything else that we should do at this time.

Victor Ibegbu
Assistant Director of Information Systems
Detroit Public Library
vibegbu@detroitpubliclibrary.org
Tel: (313) 481-1349 Fax: (313) 481-1474

"People generally fall into one of three groups: the few who make things happen, the many who watch things happen, and the overwhelming majority who have no notion of what happens. Every person is either a creator of fact or a creature of circumstance. He either puts color into his environment, or, like

a chameleon, takes color from his environment."
— Myles Munroe, Understanding Your Potential

From: LaTia Cook <LaTia.Cook@usac.org>
Sent: Monday, June 18, 2018 12:41 PM
To: Victor Ibegbu
Subject: RE: 2018 Window - Error Evaluating UI Expression when clicking a Form 471 task

Good Afternoon Victor,

We're you successful in completing the FCC Form 471?

Thank you.

Tia Cook
Program Analyst
Schools & Libraries
(202) 263-1654
USAC | lcook@usac.org

From: LaTia Cook
Sent: Monday, June 11, 2018 1:05 PM
To: 'Victor Ibegbu' <vibegbu@detroitpubliclibrary.org>
Subject: RE: 2018 Window - Error Evaluating UI Expression when clicking a Form 471 task
Importance: High

Good Morning Victor,

My apologies for not being available. Today is an extremely busy day which is why I am emailing you. Can you please remind me again are your applications filed under both the consortia and the district in the same FY? For example both entities have a 2018 application or did they file as a district in 2017 and as a consortia in 2018?

Thanks.

Tia Cook
Program Analyst
Schools & Libraries
(202) 263-1654
USAC | lcook@usac.org

From: LaTia Cook
Sent: Tuesday, June 05, 2018 3:28 PM
To: 'Victor Ibegbu' <vibegbu@detroitpubliclibrary.org>
Cc: Trinee Moore <tmoore@detroitpubliclibrary.org>; Ehtasham Ejaz <Ehtasham.Ejaz@usac.org>
Subject: RE: 2018 Window - Error Evaluating UI Expression when clicking a Form 471 task
Importance: High

Good Afternoon Victor,

The information provided in the previous email sent has not answered the question below? We still need to know whether 130944- DETROIT PUBLIC SCHOOLS COMMUNITY DISTRICT is an ESA School District or a regular school district?

We looked up consortia BEN 17006543 that you referenced below. I'm not sure what you mean by changed to a consortia, please specify. Per EPC, BEN #130944 - DETROIT PUBLIC SCHOOLS COMMUNITY DISTRICT is listed as a consortia member of BEN 17006543. This relationship doesn't have anything to do with BEN #130944 being listed as an ESA School District.

Thank you.

Tia Cook
Program Analyst
Schools & Libraries
(202) 263-1654
USAC | lcook@usac.org

From: Victor Ibegbu [mailto:vibegbu@detroitpubliclibrary.org]
Sent: Monday, June 04, 2018 10:17 AM
To: LaTia Cook <LaTia.Cook@usac.org>
Cc: Trinee Moore <tmoore@detroitpubliclibrary.org>
Subject: Re: 2018 Window - Error Evaluating UI Expression when clicking a Form 471 task

Hi LaTia
Thanks for reaching out to me on this. I reached out to the people at DPS and I was informed that this year they have an active 471 app under the BEN 17006543. This was also changed to a consortia. Detroit Public Library is still within the Detroit Public Schools district.
I also tried calling your office number earlier today. Many thanks for all the help.

Victor Ibegbu
Assistant Director of Information Systems
Detroit Public Library
vibegbu@detroitpubliclibrary.org
Tel: (313) 481-1349 Fax: (313) 481-1474

"People generally fall into one of three groups: the few who make things happen, the many who watch things happen, and the overwhelming majority who have no notion of what happens. Every person is either a creator of fact or a creature of circumstance. He either puts color into his environment, or, like a chameleon, takes color from his environment."
— Myles Munroe, Understanding Your Potential

From: LaTia Cook <LaTia.Cook@usac.org>
Sent: Thursday, May 31, 2018 4:22 PM
To: Victor Ibegbu
Subject: 2018 Window - Error Evaluating UI Expression when clicking a Form 471 task

Good Afternoon Victor,

I am currently working with EJ to help resolve your 2018 window FCC Form 471 error. Can you confirm whether #130944 - DETROIT PUBLIC SCHOOLS COMMUNITY DISTRICT is an actual ESA school district and identify the actual school district you are located in?

Thank you.

Tia Cook
Program Analyst
Schools & Libraries
(202) 263-1654
USAC | lcook@usac.org

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