**Glades Day School  
400 Gator Blvd.  
Belle Glade, FL 33430  
Telephone 561-996-6769 x 32**

Re: Request for Waiver or Appeal to FCC to not have to return $680.30 for FRN 2863025   
Applicant Name: Glades Day School  
BEN # 37364  
Form 471 Application Number 1040748  
FRN # 2863025  
Administrator’s Decision on Appeal – Funding Year 2015

On October 16, 2017, Glades Day School received reimbursement of $680.30 for Invoice **2675579** for FRN **2863025.** On **June 18, 2018,** Glades Day School **r**eceived letter from USAC for Recovery of Improperly Disbursed Funds Letter. We are requesting that we not be required to return these funds.

Reference is made to page two of the letter to Glades Day School from USAC (Exhibit 1) dated September 19, 2018 denying our appeal that says “The invoicing deadline for Funding Request Number (FRN) 2863025 was February 27, 2017. The School did not submit a BEAR form for that FRN by that deadline, and therefore was ineligible for relief under the Jefferson-Madison Reconsideration Order.”

I submit that we did file BEAR forms (see attached BEAR Forms) and that we are eligible for relief under the Jefferson-Madison Reconsideration Order and that we filed on time.

Attached documents

* Please see attached copies of the BEAR forms (472) invoices #2464370 (refiled for Invoice #2359992) in the amount $229.50 and invoice #2464881 for $540.32 (Exhibit 2 3 & 4). Each were filed on 11/01/2016 after we had submitted a request for deadline extension on October 23, 2016, which was approved on November 23, 2016.
* Please see attached Exhibits 5 and 6, copy of email dated November 23, 2016 showing that we were approved for a 120-day extension. The extension said that “an invoice must be submitted so that it is postmarked no later than the date found on USAC website…to be considered as timely filed.” And emails regarding Service Provider’s 473 Form.
* Please see attached Exhibit 7 **-** Submitted BEAR 472 Invoice #**2675579** reapplying as directed for funding for FRN **2863025.**

This has been such a long procedure that I had to make a narrative for me to keep it all straight.

Below is the chronological narrative of the journey of this FRN **2863025**, starting after it was approved by USAC to be funded and services started July 1, 2015 and ending with payment of the FRN and then request for us to return the funds. Please forgive me for the length, but I hope it helps.

**FRN 2863025 was funded by USAC and we filed 486 that services started July 1, 2015.**

**February 4, 2016 –** Email from me to Carmen at RHTS and her response (Exhibit 6) regarding her Form 473 not showing up at USAC, but she had filed it and provided USAC with a copy.

**March 14, 2016** – I filed a BEAR Form for time period 7/01/2015 – 1/31/2016. Invoice # **2359992** (Exhibit 2) for the amount of $229.50 to be reimbursed.

**May 25, 2016** – Had not received reimbursement so I called USAC to check on Invoice #**2359992** and another FRN. I was advised that my invoices were being reviewed and to check back later. (Just a note: that particular invoice still shows being reviewed as of yesterday)

Not sure of date when I checked back. I think in October. But was advised to refile the invoice.

**October 23, 2016** - I submitted request for extension of the Invoice Deadline for 2015 services (Exhibit 5).

**October 31, 2016** Keith English requested (via email) which FRN I wanted extension for. I quickly responded to the email with FRN # **2863025**.

**November 1, 2016** – I refiled BEAR 472 Invoice # **2464370** (replacing Invoice #**2359992**) and filed Invoice # **2464881** (for the last part of the funding year 15) for FRN 2863025.

**November 7, 2016** – I appealed denial of payment for Invoice #**2464370** and #**2464881**.

**November 10, 2016** Received Administrator’s Appeal Acknowledgement Letter (FY 2015) Acknowledging receipt of my correspondence date November 7, 2016 and pointing out the steps that will be followed to approve or deny.

**November 17, 2016** – Received letter from Administrators: **FRN2863025**, Decision on Appeal: **Denied**. USAC denied your request for Invoice Deadline Extension because the request was not filed in a timely manner.

**November 23, 2016** – I received acknowledgement and approval of my request for a one-time 120 day invoice deadline extension for 2863025 via email from [deadline@sl.universalservice.org](mailto:deadline@sl.universalservice.org).

Since I had already filed invoices Invoice # **2464370** and Invoice # **2464881** for FRN **2863025** on November 1, 2016, I thought I had complied with the rules.

**August 2, 2017** – Administrator’s Decision on FCC Remand Letter Funding Year 2015 (Exhibit 7) identifying Invoice # **2359992** as qualifying for relief provided for in FCC Order DA 17-526 released on May 30, 2017. This was true because I eventually learned that USAC did not have our Service Provider’s certification. It directed to “Please resubmit your BEAR form for the information identified above by September 1, 2017 for processing.

**August 29, 2017 -** Submitted BEAR 472 Invoice #**2675579** reapplying as directed for funding for FRN **2863025**, superceding previous invoices.

**October 16, 2017** – Received reimbursement of $680.30 for Invoice **2675579** for FRN **2863025**.

**June 18, 2018** – Received letter from USAC for Recovery of Improperly Disbursed Funds Letter.

**July 11, 2018** - I submitted an Appeal Letter requesting USAC to cease its recovery because I did submit my invoices before September 1, 2017.

**August 1, 2018** – Administrator’s Appeal Acknowledgement Letter of my correspondence dated July 11, 2018

**September 19, 2018** – Received another Administrator’s Decision on Appeal – Funding Year 2015 – 2016. This one show the appeal denied. “USAC is not authorized to waive the Federal Communications Commission (FCC) rules. “It also said “you must submit your request for waiver or appeal to the FCC within 60 days of the date of this decision letter. “

I submit that we did file on time (see August 29, 2017 above) and that the funds should not have been required to be returned.

Glades Day School is seeking your favorable resolution to this problem and ask that we not have to return the amount of $680.30.

Respectfully,

Marion Primmer, IT Director  
Glades Day School  
400 Gator Blvd.  
Belle Glade, FL 33430