

December 14, 2018

Letter of Appeal  
Ms. Marlene H. Dortch  
Federal Communication Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools and Libraries Universal Service Support Mechanism.  
CC Docket No.02-6

---

In re:  
Billed Entity Number: **16058001**  
Appellant: E Rate Solutions Group  
Applicant: **Rural Resources Community Action**  
Fund Year: 2018 FCC Form 471: 181008328 (category 1)

REVISED/CORRECTED LETTER – Corrected items are in Bold and underlined.

Original Letter was submitted Dec 14, 2018 - Confirmation Number: 20181215066611550

Dear Ms. Dortch:

This is a “Letter For a Waiver of the time to file for an Appeal of the FCDL issued on Oct 12, 2018 Fund Year: 2018 FCC Form 471: 1810 (category 1) due to various inherent flaws in USAC’s EPC system as described in detail in Chairman Pai’s April 18, 2017, letter to Chris Henderson of USAC, the USAC EPC (“Epic”) Portal system, and USAC as a whole, have “serious flaws.” For example:

- There were repeated problems and various outages with the EPC Portal input system, during which users could not access or upload necessary data.
- USAC instituted an arbitrary lock-down of data that prevented the update of filers’ account portals.
- Unexplained blocks on the filing of Forms 471 occurred, preventing the necessary filing of forms prior to the close of the filing window, and/or necessitating filing for benefits under an incorrect entity identification.

The Chairman specifically instructed USAC to “identify alternative options to assist applicants even in the event of IT failures.” In our case, such IT failures and other numerous problems evident in the USAC system and structure have prevented our responding to PIA inquiries and filing an Appeal by December 11, 2018.

Therefore we are formally requesting a Waiver of the time to file an Appeal of the FCDL to allow USAC to correct Block 4 information. The Appeal of the FCDL was filed only a few days late and the requested information is on USAC's website for Cal Head Starts.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,

*Katherine M. Weiss*

Consultant

---