



Letter of Appeal
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

December 21, 2018

Request for Waiver of Last Date to Invoice:

CC Docket No. 02-6

This Letter of Appeal is for The Educational Alliance, Inc., BEN 16050376. This is requesting a Waiver of the Last Date to Invoice for all FRNs on 471 Application Number 171020361 or the 2017-2018 funding year.

The contact information for this appeal is:

Joseph Tarver
VP Operations, The Educational Alliance, Inc.
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Appeal Information:

The Educational Alliance underwent an Audit for the 2016-2017 funding year. Thus far, the district has received preliminary findings from the audit, but has yet to discuss them further with USAC, to obtain the final results. In addition, we do not yet know what actions USAC might take, based on the findings. Per USAC, we will likely not hear back until at least February 2019. There were several items in the audit findings, which require that the district reassess how applications are filed and how reimbursements are requested, to remove ineligible costs, associated with a portion of the student population. Until such time as we are able to discuss these findings, and any possible remedies, with USAC, it seems premature to request any additional reimbursements. Without additional time, any errors found during the audit would likely repeat in subsequent years.

We are requesting that the FCC grant a Waiver of the Last Date to Invoice for the 2017-2018 funding year, so that the district can better understand the audit findings and incorporate these findings, and any associated remedies, into our filing process, for subsequent years, including 2017-2018. This will help to ensure that any past issues are not repeated in 2017-2018.

The district has already requested an Invoicing Deadline Extension for the FRNs, so the only way to allow for more time is through a Waiver of the Last Date to Invoice. We request that the district be provided with a Waiver of the Last Date to Invoice, for the longest period possible, to ensure that any discussions with USAC can be completed and any changes to the filing process be made, to be consistent with the audit findings. In some cases, Service Providers issued SPI discounts to the invoices. The audit findings, which are not totally clear, seem to indicate that at least one provider applied discounts to the invoices that were in the incorrect amounts. This is particularly important, since that provider also applied discounts during 2017-2018. We feel that it is best if we review any and all filings made by this provider and request that they amend their filings, as needed. There is no way that this can possibly be accomplished by the current 2/26/2019 Last Date to Invoice.

The FRNs are as follows:

1799041224
1799041234
1799041238
1799041242
1799041246
1799041248
1799041251
1799041308

Please advise if any additional information is required for consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Tarver", with a stylized flourish at the end.

Joseph Tarver
Vice President of Operations and Risk Management