

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Connect America Fund)	
Rural Broadband Experiments)	
)	WCB Doc. No. 10-90
Rural Broadband Services Corporation, Inc.)	
Request for Waiver of Requirement for)	
Three Years of Audited Financial Statements)	

**Request for Waiver of Requirement for
Three Years of Audited Financial Statements**

Rural Broadband Services Corporation, Inc. (“RBSC”), by counsel, requests waiver of the requirement that provisionally selected bidders for Rural Broadband Experiment funding provide three years of audited financial statements during the post selection review process.¹ In support of its request the following is shown.

RBSC was incorporated in 2013 and began providing broadband connectivity to several institutions in northeast Oklahoma in 2014. RBSC’s proposal for Rural Broadband Experiment (“RBE”) funding described its intent to expand its service offerings to an area within five counties including the “anchor” institutions of the Cherokee Nation. Because it has slightly less than 6 months of operational experience, and the financials for the partial year 2014 are neither closed nor audited, RBSC is unable to provide three years of audited financial statements.²

RBSC recognizes the validity of the Commission’s concern that RBE funds be provided to entities that have both the financial resources to implement their proposals successfully and

¹ Public Notice DA 14-1772, released December 5, 2014, Attachment B, p. 3.

² The fact that RBSC is a start-up entity without three year’s operating experience was made clear in its bid.

the financial controls in place to ensure accountability. RBSC will provide details of its financial projections and fiscal resources in its Form 5620 filing to be made on or before December 19, 2014. These details will reflect its engagement of an independent CPA to maintain a system of accounts and prepare quarterly, unaudited financial reports that will be provided to the Commission. In addition, RBSC will engage a separate accounting firm with extensive telecom knowledge to perform an annual audit of its financial statements, which will be reported to the Commission annually throughout the 10 year funding period.

RBSC therefore requests that the above described waiver be granted.

Respectfully submitted

Rural Broadband Services Corporation, Inc.

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