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April 20, 2015

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

CC Docket No. 13-184

Request for Waiver of the Rules

Oswego Public Library District  
32 W Jefferson St  
Oswego, IL 60543 - 9078  
BEN: 135714

Zeller and Associates, LLC requests a waiver from the filing deadline rule on behalf of the Oswego Public Library District (Billed Entity Number: 135714) with respect to FCC Form 471 Application Number 1051658 which was submitted on April 20, 2015, four (4) days after the April 16, 2015 deadline.

We make this request consistent with precedent established in multiple orders (*Acadia Parish School Board Head Start Program, Crowley, LA*<sup>1</sup>, *Acorn Public Library District Order*<sup>2</sup>, *Academy of Math and Science Order*<sup>3</sup>, *Anderson Elementary School Order*<sup>4</sup>).

We respectfully ask that the Federal Communications Commission grant this waiver of the rules and direct the Universal Service Administrative Company to treat FCC Form 471 Application No. 1051658 as if it were filed prior to the deadline.

Please find our Letter of Agency accompanying. Please use the contact information below for any questions, requests or correspondence.

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<sup>1</sup> *Acadia Parish School Board Head Start Program, Crowley, LA, DA 12-1482, Adopted 9/14/2012, para. 2:* We grant the 13 waiver requests listed in Appendix A, because those petitioners' applications were filed within 14 days of the close of the filing window.

<sup>2</sup> *Acorn Public Library District Order, DA 08-23 76, Adopted 10/30/2008, para. 5:* Establishing that submission of a 471 application within 14 days is a procedural and not substantive violation. "Because the violation at issue is procedural, not substantive, we find that complete rejection of each of these applications is not warranted. Therefore ... because the FCC Form 471 was filed within 14 days after the filing window deadline, we find it in the public interest to waive the FCC form 471 deadline."

<sup>3</sup> *Academy of Math & Science Order, FCC 10-122, Adopted 6/17/2010, para. 9:* "... we find that these applications were filed close enough to the deadline so as not to impair the administration of the program."

<sup>4</sup> *Anderson Elementary School Order, DA 12-796, Adopted 5/22/2012, para. 2:* "We grant the 40 waiver requests ... because those petitioners applications ... were filed shortly after the filing window closed."



ZELLER AND ASSOCIATES, LLC

Sincerely,

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