

May 6, 2015

Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: Request for Waiver – Funding Year 2015 FCC Form 471 Filing Deadline  
Archdiocese of Chicago Schools Entity Number 135766  
Schools and Libraries Universal Service Support Mechanism  
CC Docket No 02-6

Dear Ms. Dortch,

Consistent with precedent,<sup>1</sup> the Archdiocese of Chicago Schools requests a waiver of the FY2015 FCC Form 471 application filing deadline under the E-rate program. The waiver is requested for the following Form 471 applications:

Form 471 Number	Billed Entity Number	School Name
1007351	69169	Trinity High School
1007390	69582	Queen of Peace
1007117	69582	Queen of Peace
1020617	70891	St Mary of the Wood
1019318	70630	St Edward School
1021469	70819	St Viator
1017669	16061686	Frassati Catholic Academy

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<sup>1</sup> See Requests for Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 25 FCC Rcd 9256, 9259-60, paras. 8 & 9 (2010) (finding special circumstances exist to justify granting waiver requests where, for example, petitioners filed their FCC Forms 471 within 14 days after the FCC Form 471 filing window deadline; filed their FCC Forms 471 on time, but failed to timely file their certifications; or filed within 30 days despite medical issues); Requests for Waiver and Review of Decisions of the Universal Service Administrator by Anderson Elementary School et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order 27 FCC Rcd 5319, 5319-20, para. 2 (Wireline Com. Bur. 2012) (treating late-filed item 21 attachments like late-filed certifications); Requests for Waiver of Decisions of the Universal Service Administrator by Academy for Academic Excellence et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 22 FCC Rcd 4747, 4749, para. 4 (Wireline Comp. Bur. 2007) (finding special circumstances exist to justify granting waiver requests where petitioners were unable to file on time due to reorganizations but still filed with a reasonable time); Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ashtabula Area City Schools et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-06, Order, 28 FCC Rcd 4051 (Wireline Comp. Bur. 2013) (dismissing petitions for reconsideration because the petitions failed to identify any material error, omission, or reason for warranting reconsideration, and relied on arguments fully considered and rejected by the Bureau within the same proceeding).

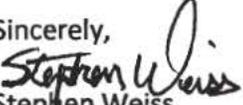
The quantity of information and time required using the new on-line filing system proved to be substantially higher than that required in previous years of manually filing Forms 471. In addition, a number of issues were experienced with the on-line application, which slowed the progress of entering information, and caused the Forms 471 to be incompletely entered. Specifically we experienced the following issues with on-line filing:

- In working with the Item 21 attachments we were often met with a variety of inexplicable errors, even when using the USAC provided template. Examples of such system errors were: "waiting for data", "combination of data types not valid."
- The system forced us to manually change information that should have auto-populated on the "Connectivity Questions" page (Urban vs. Rural).
- Error messages did not provide enough information to diagnose the problem, requiring spending significant amounts of time trying to figure out what was causing the error.
- In completing the Block 4 in the on-line system the inadvertent choice of the incorrect category of service was not correctable. This required cancelling the application and starting over.

The difficulties encountered in working with the on-line system entailed a significant increase in the time and effort needed over that experienced with manual filing in prior years, substantially contributing to the out of window filing of several Forms 471. Despite the difficulties experienced we were able to successfully complete some thirteen hundred Forms 471 for the Archdiocese of Chicago Schools within the deadline.

#### Relief Sought

On behalf of the Archdiocese of Chicago, we respectfully request that the filing deadline for the seven Forms 471 listed above be waived, and that the status of the requests be changed from "out of window" to "in window".

Sincerely,  
  
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