



# Livingston Parish Public Schools

*Excellence in Education!*

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**John Watson**  
*Superintendent*

*Rick Wentzel*  
*Assistant Superintendent*

*Joe Murphy*  
*Assistant Superintendent*

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

August 18, 2015

RE: Request for review of an Invoice Deadline Extension Denial made by the Universal Service Administrator, Schools and Libraries

FCC Form 471 742144; BEN 139278; FRNs 2003763, 2008327, 2008349, 2008373, 2008389, 2008403, 2008417, 2019393  
CC Docket No. 02-6

Livingston Parish Public Schools (LPS) requests review of USAC's denial of an invoice extension request submitted within 12 months of the deadline. The original deadline extension request was submitted December 17, 2014 and was denied. LPS appealed the denial on May 25, 2015 and the request was denied on June 18.

LPS submitted a Form 471 for Priority 2 services in 2010 and these services were funded in Wave 85. The Service Start Date was May 1, 2012. BEARs were submitted in attempt to invoice USAC for the funds. However, these invoices were not paid. It was later discovered that the original application was filed using the wrong SPIN number and subsequently a corrective SPIN change was made and a revised FCDL was issued in Appeals Wave 49.

When the revised FCDL was issued, the invoice deadline was set to January 28, 2014.

The E-rate coordinator for LPS retired from the district before invoicing was accomplished and did not make her successor aware of the outstanding funding requests.

There was additional confusion when the new E-rate coordinator was advised by the service provider that the application was filed with the wrong SPIN. He believed that he would not be able to invoice USAC until a SPIN change had been made.

When he learned that the invoice deadline had been missed, the new E-rate coordinator requested an invoice extension.

In the E-rate Modernization Order, the FCC established as a rule, the invoice deadline. There was much confusion surrounding the establishment of this rule and applicants were unsure of the date that USAC would begin enforcing the hard deadline. Speculation and guessing was the result as many districts struggled to determine what needed to be done to ensure that funds they were committed were successfully invoiced. Upon receipt of the invoice extension request, USAC denied it.

Confusion and staff changes caused the district to miss out on significant funds which are crucial to the children of rural Livingston Parish. LPS humbly requests that the FCC grant a waiver of the invoice deadline and the opportunity to submit invoices for payment by USAC.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Logan", with a stylized flourish extending to the right.

Robert Logan  
Director of Technology  
Livingston Parish Public Schools