

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Requests for Waiver and Review of	)	
Decisions of the	)	
Universal Service Administrator for	)	
	)	
Franklin County School District	)	File No. 1006583
	)	
	)	
Schools and Libraries Universal	)	
Service Support Mechanism	)	CC Docket No. 02-6

Request for Review and Waiver

Summary

An incorrect BEN was entered on application number 1006583, FRNs 2733336 and 2733349. The correct BEN for these apps should be North Carolina Office of Information Technology Services, BEN 162994. This is for local and long distance services for Franklin County School District.

The request to correct the BEN on the application and subsequent FCDL was untimely appealed to USAC, (see Attachment A – Letter of Appeal dated November 3, 2015) and ultimately denied (see attachment B, Administrator’s Decision on Appeal dated November 19, 2015).

This appeal to the FCC is timely filed, within 60 days of the USAC denial.

Issue

While we understand that the USAC team must follow deadlines for rules, Franklin County believes this waiver is for good cause and will ultimately help the children and their parents in the community. We simply need to have a post commitment correction of the BEN on the above named FRNs so they may be invoiced properly. Precedent for this is Onslow County <sup>1</sup> and Robeson County Schools (Approved Administrator’s Decision on Appeal from 2013) respectively.

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<sup>1</sup> Block 1 billed entity error correction, DA 12-693, released May 3, 2012

## Discussion

Franklin County Schools is a small, 16-school District in rural north central North Carolina. In the past 12 months, there have been two superintendents and three technology directors. Tech Director #1 filed the 2015 470 for services and Tech Director #2 (who was employed for about 30 days) filed all the 2015 471 apps with numerous errors. Technology Director #3, with no previous E-rate experience, contacted State E-rate Coordinator Jeannene Hurley with the latest correspondence, which was the denial of the administrator's decision because the request to change the BEN was after the 60-day deadline to appeal the FCDL.

## Conclusion

Franklin County respectfully requests that the Federal Communications Commission waive the 60-day deadline to Appeal the FCDL, and then allow the post commitment correction of the BEN from 126860 to 162994 for application number 1006583, FRNs 2733336 (\$28,800) and 2733349 (\$28,800), for a total of \$57,600.

Respectfully submitted on this 17th day of December, 2015

Tremain McQueen  
Technology Director  
Franklin County Schools

Jeannene Hurley  
North Carolina State E-rate Coordinator