



**Delaware County Intermediate Unit  
Information Technology and Systems  
Education Service Center  
200 Yale Avenue  
Morton, PA 19070-1918  
Phone: 610-938-9000, Ext. 2110  
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David Tirado, Director

May 9, 2016

Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Re: Request for Waiver of Invoice Deadline Extension, CC Docket No. 02-6

Form 471 # 960601, FRN 2670116

Intermediate Unit 25 respectfully requests a waiver of the deadline for submitting an invoice deadline extension request, pursuant to 54 C.F.R. §54.514(b) for a FY 2014 FRN. This FRN is for Internet access service delivered to an Intermediate Unit, 15 school districts and 18 libraries in Delaware County, Pennsylvania. The service is provided via a county wide consortium that is administered by the Applicant, Intermediate Unit 25. The Vendor's name is Lighttower but in FY 2014 when the Form 471 was submitted, the vendor's SPIN was associated with the name "Sidera Networks." The two companies merged in April of 2013.

In the summer of 2014, the Applicant requested that the Company provide discounted bills that reflected the benefit of the E-rate discounts. See Exhibit 1. This request, however, was submitted prior to the receipt of the funding commitment decisions letter, which was issued on October 1, 2014. Accordingly, the Applicant received non-discounted bills at the beginning of the funding year and expected the vendor to then issue a credit for the E-rate discounts paid prior to the receipt of the FCDL.

The original invoice deadline for this FRN was October 28, 2015. As of the original invoice deadline, a Service Provider Invoice had not been submitted and funds had not been authorized for disbursement on the FRN. As a precautionary measure, the Applicant sought and obtained the invoice deadline extension which was approved on November 19, 2015. The Applicant's consultant unsuccessfully tried to verify that discounted billing had been set up, that the discounts had been credited to the applicant's bill, and that the vendor would submit a service provider invoice.



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Unfortunately, the Applicant was unable to verify this information prior to the new invoice deadline of February 25, 2016. The Applicant's point of contact for E-rate, the Director of Technology, had resigned in the summer of 2015, and the position was vacant until January of 2016. The Director of Technology served as the point of contact to coordinate the billing for the consortium services and was the individual who would have been privy to the billing arrangements with the vendor.

Meanwhile, also in the November 2015 time frame, the Applicant was working on PIA responses to FY 2015 Form 471 application questions, and setting up the new EPC portal. The EPC portal has been all consuming in order to ensure that the information in the system is properly configured so that the Applicant can submit a consortium Form 471 application. Between the change in personnel, working on PIA questions for FY 2015 Form 471 applications, and working on the new EPC portal for FY 2016, the Applicant was unable to resolve the outstanding billing issue for this FRN and missed the invoice deadline for submitting a reimbursement form.

For all of these reasons, the Applicant requests the FCC to grant a waiver of the invoice deadline and allow the Applicant to submit a reimbursement form to recoup the benefit of the E-rate discounts for this Internet FRN. The requested reimbursement is \$38,057.00 or an average reimbursement of \$2378.56 per consortium member.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Tirado", with a long horizontal flourish extending to the right.

David Tirado  
Director of Information Technology and Services