



DEPARTMENT OF TECHNOLOGY AND INFORMATION  
STATE OF DELAWARE  
801 SILVER LAKE BLVD.  
DOVER, DELAWARE 19904  
302-739-9500



May 13, 2016

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

Subject #1: Letter in Support of State E-rate Coordinators' Alliance Petition for Reconsideration of Order DA 16-448, Petition for Waiver and Petition for Rulemaking, CC Docket No. 02-6

Subject #2: FCC Petition for Waiver of FY'2014 Invoice Filing Deadline  
DSCYF Special Schools, BEN 16058378, FRN 2644892  
State of Delaware

Dear Secretary Dortch:

I am writing on behalf of the State of Delaware as the State E-Rate Coordinator in reference to the Petition submitted by the State E-Rate Coordinators' Alliance (SECA) on May 12, 2016 asking the FCC's Wireline Competition Bureau to reconsider and grant relief to applicants who missed the invoice deadline and are unable to receive their E-rate funding.

Delaware understands the action the FCC took to tighten the invoice deadline procedures to improve program efficiency. However, as with most procedures, there should be room for mistakes to be corrected when an obvious clerical or ministerial error causes a missed deadline. Applicants can do everything right but miss one deadline and try to comply as soon as the error is found, only to be denied. That is the case when funding was denied in DA 16-448. Therefore, Delaware heartily supports the SECA Petition for Reconsideration and the action requested for all applicants included.

SECA requested the Wireline Competition Bureau reconsider and grant the waiver requests that were denied initially in the April 25, 2016 Order at DA 16-448, and provide a 120-day extension to file the associated invoices. Delaware is an unfortunate party to that request for reconsideration and waiver.

Specifically, this is a request for restoration of funding for the State of Delaware and its Special Schools for Juvenile Justice in the Department for Services to Children, Youth and Families (DSCYF). The BEAR form that missed the invoice deadline solely due to a clerical/ministerial mistake was for FRN number 2644892 for Funding Year 2014-15 under District BEN 16058378. An FCC Petition for Waiver of Deadline was filed on February 9, 2016 under CC Docket No. 02-6 and the FCC letter DA 16-448 denial was issued on May 2, 2016.

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I am asking the FCC to reconsider its denial of the appeal and grant the waiver request to this Delaware state agency school. It badly needs the \$12,819.82 to fund the technology to serve education of the under-privileged juvenile justice students in Delaware. The hope is that the FCC regards the SECA Petition favorably and grants relief to the affected E-rate stakeholders such as our DSCYF Special School District.

Sincerely,

A handwritten signature in cursive script that reads "Kay R. Buck".

Kay R. Buck, State E-Rate Coordinator  
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302.739.9649