

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Petition for Waiver of)	
FCC Form 471 Filing Deadline)	
)	
Clint Independent School District)	CC Docket No. 02-6
(Clint District, BEN: 142091))	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	

**Petition for Waiver of
FCC Form 471 Filing Deadline for Funding Year 2019
RE: FCC Form 471#: 161058002 BEN: 142091**

I. INTRODUCTION AND SUMMARY

The Clint Independent School District (“Clint District”) serves low income pre-kindergarten through Grade 12 children spanning three major, separate and distinct communities 25 miles east of El Paso, Texas – the Town of Clint, a stable farming and ranching area; the town of Horizon City, a growing suburban area; and the community of Montana Vista, an unincorporated area. Since 1997, Clint District has been a consistent and successful participant of the E-Rate program.

The Clint District submitted and certified their Funding Year 2019 FCC Form 471, 161058002, in the “Apply For E-Rate” portal of the Schools and Libraries Division (“SLD”) of the Universal Service Administrative Company’s (“USAC”) website, on June 1, 2016 just 8 days after the FCC Form 471 filing deadline of 11:59:59 PM EDT on May 26, 2016.

There were several issues that caused the Form 471 to be filed late.

- We received the completed contracts and statements of work required to file many of our Form 471 applications late from our vendors, some as late as the last day, May 26, 2016, in the filing window.
- The new EPC data entry process for Category 2 Internal Connections impacted the completion process even further. In the past, the item 21 attachment for Internal Connections was simply attached for each form 471 application. The new application process requires a considerable amount of data entry hours in order to complete each funding request and certify each form 471 application. This new process requirement of entering each individual FRN line item entry was highly underestimated when compared to our previous years' application process. We had no comparison to gauge the amount of time required to enter the required data.
- As an alternative, we tried to utilize the bulk upload templates, but this proved to be as time consuming as the individual FRN line item data entry due to preparation and resolving errors required within the bulk upload templates.

Clint ISD has always planned appropriately in all the preparation steps needed to successfully file and participate in the E-Rate program. Including always providing the item 21 attachment requirement within the application filing window. We appreciate and understand that the new Form 471 data entry process will help to improve on the overall application process and we will plan more time accordingly. We, unfortunately, could not have anticipated the amount of data entry hours required during this application year.

II. Request

The Clint District respectfully petitions the Commission to request a waiver of the Funding Year 2019 FCC Form 471 filing deadline on behalf of the Clint District to allow the Out of Window submission of their E-Rate Funding Year 2019 FCC Form 471# 161058002, due to the issues beyond our control cited above.

Respectfully submitted,



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Dated: July 9, 2016