



Petition for Reconsideration

In the matter of:

DA No.16-600, released May 31, 2016

Sarah A. Reed Children's Center, PA Application No. 957402, Request for Waiver, CC Docket No. 02-6 (filed Feb 3, 2016 : April 13, 2016)

To Whom It May Concern:

Telecommunications Access Policy Division

Wireline Competition Bureau

Federal Communications Committee

In a decision dated May 31, 2016 we were informed by the FCC that our request for a timely filing waiver for our BEAR cellular service reimbursement was denied. We respectfully request that you reconsider this decision. Sarah Reed Children's Center BEN: 232653 was approved for FRN: 2795877. We completed a PIA review and agreed to their decision to reduce the funding, removing ineligible charges. We paid for these services throughout the year and filed our BEAR reimbursement form originally on paper, which was sent certified mail.

This request for reconsideration is based referencing different occasions to file our BEAR for cellular telephone service. Our first attempt at filing this BEAR occurred in September 2015. This request was filed on paper and delivered by Federal Express on September 23, 2015 to 3833 Greenway Drive in Lawrence, Kansas. The package was received by an individual whose last name is Garcia on September 25, 2015 at 9:12am as the enclosed shipping documentation indicates.

A few weeks earlier, we had filed two other BEAR forms in the same manner. After receiving reimbursement for those two requests we checked on the status of the cellular BEAR. It was at that time we found that our paper BEAR was never received. In response, we filed an appeal and requested a waiver on February 2, 2016 our request for this waiver was granted. Upon receiving approval of our request, we immediately filed the BEAR again. At that time we were able to file the BEAR electronically. During the same time, we submitted another BEAR for switches that we were also approved for. When we completed the online filing we believed that both BEAR forms had been accepted. A short while later we received the reimbursement for the switches.





Within a few days of not receiving our reimbursement for the cellular service we investigated the status of our on-line request only to discover there was no record of this BEAR. When attempting to refile this BEAR it was discovered we were two days beyond the 30 day filing period and the form was no longer available. We immediately called the USAC helpdesk and were told that we would have to file another appeal with the FCC requesting a timely filing waiver, which was denied.

While all this was happening. We had a different employee taking over responsibility for our E-RATE process because our previous E-RATE coordinator left our employ on very short notice. While learning everything there is to know about the E-RATE program and the new EPC system she was also filing our 470's and 471's for the coming 2016-2017 funding year and missed that deadline by a couple of days.

This has been a long and arduous process which we feel we have made every attempt to meet all deadlines and requirements. She spent countless hours on the phone with the USAC helpdesk working through issues navigating the system and filing the 471's.

This request for reconsideration is not based on our negligence for ignoring deadlines. Rather it is based on multiple efforts to make timely submissions of our BEAR only to have circumstances beyond our control preclude the BEAR from being received and processed. Additionally, there is precedence in the Alaska Gateway Orders for granting an extension of time of up to 14 days for filing form 470 once. Our request was for a 2 day extension for our third attempt to file our BEAR for cellular service.

I am including the petition filed by the State E-Rate Coordinators Alliance on behalf of all schools and libraries filed May 12, 2016 Petition for Reconsideration of Order DA16-448, Petition for Waiver, Petition fo (12). For the reasons cited above as well as the reasons cited in the attached SECA petition, we request that you approve our petition for reconsideration.

Thank you for your consideration of our petition.

Respectfully submitted,

Sarah Reed Children's Center

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