

**Service Associates, Inc.**  
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160 East Main Street  
Brevard, North Carolina 28712  
828.885.2832 Phone – 828.885.5023 FAX

July 8, 2010

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

CC Docket Number 02-6  
CC Docket Number 96-45

VIA ECFS

**Re: Request for Waiver**

To Whom It May Concern:

Our contact information and application identification are as follows:

**Applicant** Tom Traywick, Senior Compliance Analyst  
**Contact:** Janice J Crosby, E-rate Coordinator  
Williamsburg County School District  
Post Office Box 1067  
Kingstree, SC 29556  
[wcsd@serviceassoc.com](mailto:wcsd@serviceassoc.com)  
(828) 885-2832  
(828) 553-9366

**This appeal letter requests waiver of the rules in order to allow transfer of E-rate funding from a closed entity consistent with the rules allowing transfer of E-rate funded equipment from a closed entity.**

**Regarding:** Funding Commitment Decision Letter:  
Date of Letter June 3, 2009  
Applicant Williamsburg County School District  
Billed Entity Number 127201  
  
Form 471 Application Number 622964

## Grounds for Request

The purpose of this letter is to request relief from the rules as they stand. The district has received the FCDL for a 2008 request (Form 471 Application Number: 622964). The SLD decision was delayed due to an investigation into circumstances outside the district's control or involvement.

One of the schools (Entity 31371) for which the application was intended has ceased to exist, and the enrollment absorbed into other schools in the district (BEN 127201). The SLD does not provide guidance for this scenario and existing program rules lack any mechanism for transferring the funds to other entities. The SLD initially instructed the applicant to simply file a request for transfer of equipment which was done with out response from SLD. A BEAR was then filed for reimbursement of the equipment as transferred, again without response from SLD. It has now at this late date finally become apparent that SLD does not know what to do and that a request for waiver should be filed.

The district hereby requests a waiver of the rules to allow the funding that was approved to be transferred to other eligible schools in the district. We believe this request is clearly within the spirit of the purpose of the E-rate program and complies fully with SLD guidelines for the transfer of equipment from a closed entity as detailed on the SLD website.

<http://www.usac.org/sl/about/changes-corrections/transfers-equipment.aspx>

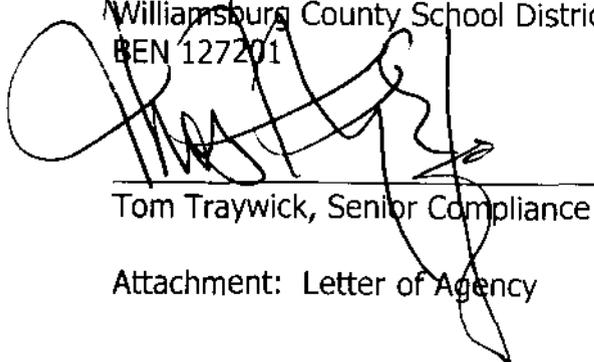
## Closing

We respectfully request that this waiver be granted so that this District can claim these important funds. To do otherwise would contribute to unintended consequences of hardship and inequity for the students and teachers in this District.

Thank you for your prompt attention to this matter. Please contact me if you have any questions or need additional information. My Letter of Agency is attached.

We look forward to your response.

Sincerely,  
Williamsburg County School District  
BEN 127201



Tom Traywick, Senior Compliance Analyst

Attachment: Letter of Agency

# School District of Williamsburg County

Post Office Box 1067 • Kingstree, South Carolina 29556

Telephone (843) 355-5571 • Fax (843) 355-3213

February 23, 2009

Schools and Libraries Division  
Box 125 – Correspondence Unit  
80 South Jefferson Road  
Whippany, NJ 07981

To Whom It May Concern:

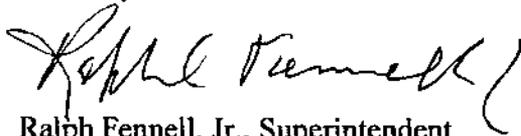
This letter is to inform you that the Williamsburg County School District has retained Service Associates, Inc. to advise and assist the District in all matters regarding E-Rate and associated matters, effective October 1, 2008, and we hereby authorize you to fully and openly speak and/or correspond with Tom Traywick and/or Oliver Frail and/or Heather Hosey regarding all District matters before USAC-SLD and/or the FCC.

Additionally, Tom Traywick or Oliver Frail or Heather Hosey may serve as the District's Form 471 Block 1 contact person and as the District's E-rate contact on any other forms or letters requested by the District.

This Letter of Agency replaces all other prior Letters of Agency addressed to USAC-SLD and covers the time frame through October 31, 2010.

Thank you for your assistance in this matter.

Sincerely,



Ralph Fennell, Jr., Superintendent  
Williamsburg County School District  
423 School Street  
P. O. Box 1067  
Kingstree, SC 29556  
843-355-5571 ext. 231

cc: Tom Traywick  
Hattie Pendergrass