

**Before the  
Federal Communications Commission  
Washington DC 20554**

	)	
Request for Waiver of Form 471	)	
Certification Deadline	)	Administrator Correspondence Dated
for Friendship Public Charter Schools,	)	April 27, 2011
Washington, DC	)	
	)	
Schools and Libraries Universal Service	)	CC Docket No. 02-6
Support Mechanism	)	
	)	

**Request for Waiver**

In accordance with Sections 54.719 through 54.721 of the Commission’s Rules, Friendship Public Charter Schools (Friendship) requests Federal Communications Commission (Commission) waiver of the May 17, 2011 deadline for submission of Year 2011 Certification for application number 774609.

**Friendship Public Charter Schools**  
**Billed Entity Number: 16039865**  
**FCC Registration Number: 0016961252**  
**Form 471 Number: 774609**

**Background**

Friendship filed two Forms 471 for Fund Year 2011 – Numbers 774609 and 782739. The former was for Priority 1 services and the latter for Priority 2 services. Due to a clerical error, both forms were identified as “Friendship P1” on the Applicant’s Form Identifier.

The applications were filed online and Certifications emailed to Friendship for signature and mailing to the SLD. According to SLD records, the Certification for application number 782739

was dated March 23, and postmarked the same day. Friendship believed it had signed both Certifications and mailed both in one envelope.

The consultant, reviewing application status on the Administrator Website, noted that one Friendship application had not been certified – either in or outside the filing window. The consultant emailed the certifications to Friendship requesting they be signed and returned. Friendship re-signed the Certifications, dated April 5, 2011 and returned them to the consultant (Attachment 1 and 2). In correspondence dated April 27, 2011, the Administrator sent a letter to Friendship’s consultant indicating it had not received a Form 471 Certification for application number 774609. The consultant believed the missing certification was delivered to the Administrator via United Parcel Service.

In early June, 2011 the Administrator updated the Data Retrieval Tool (DRT) recognizing all applications that had been filed by the deadline of March 23 and certified on or before the Certification deadline of May 17, 2011. When the DRT was updated, the consultant verified the certification status of all filed applications. The Friendship application here under appeal was missing from the updated DRT.

## **Discussion**

It was absolutely the intent of both Friendship and the consultant to timely submit the Certifications for both 2011 Forms 471. We are at a loss to understand the missing Certification. It is possible the identical designation on the Applicant’s Form Identifier resulted in duplicate submission of the P2 Certification. It is possible both Certifications were submitted in one envelope and misplaced by the Administrator. Because the Certification signature page does not contain the Form 471 Application Number, it is possible that the signature page and the page containing the Application Number became detached at some point during transit or processing.

If the pages are detached, there would be no way for the Administrator to match the signature page with the Application Number (see Attachments 1 and 2).

**Conclusion**

The Commission has previously noted that the Certification deadline is procedural rather than statutory and has routinely granted waivers for good cause. The record shows that the Friendship Applications were timely submitted, Certifications were timely signed and Item 21 Attachments timely delivered to the Administrator. Clearly it was the intent to certify both applications. We ask that the Commission waive the May 17, 2011 Certification deadline for this application.

Respectfully submitted,

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Greg Weisiger

Consultant

Friendship Public Charter School

120 Q ST NE STE 200

Washington, DC 20002