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April 3, 2013

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

Appellant Name: Richard Senturia, Consultant for the Applicant
Appellant CRN: 16040892
Applicant: Southwest Barry County School District R5
BEN: 137521
Form 471 #: 479796, 598165, 651709
FRN #: 1330707, 1653748, 1787706

Re: **Request for Review**

Administrator Denials for Invoice Deadline Extension Requests dated 1/17/13 and Later
CC Docket No. 02-6

Dear Mrs. Dortch:

Southwest Barry County R5 School District is appealing USAC's denial of invoice deadline extension requests and subsequent appeals for FRNs 1330707, 1653748 and 1787706 in letters dated March 29, 2013 having the following explanation:

- **Current invoice deadlines and procedures require that Invoice Deadline Extension requests be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension. The invoice receipt deadline is 120 days after the end of the service delivery date or 120 days after the date of the Form 486 Notification Letter whichever is later. USAC rejected your request for Invoice Deadline Extension because the request was not filed in a timely manner. Since USAC's decision was consistent with Invoice Deadline Extension guidelines, your appeal is denied.**

In our original requests and subsequent appeals we explained to USAC that the applicant had experienced numerous changes in its key staff which negatively affected its E-Rate management and that these changes resulted in the loss of District knowledge of E-Rate rules, regulations, policies, procedures, guidelines and deadlines. As a result, the applicant failed to file timely Billed Entity Applicant Reimbursement (BEAR) forms.

As evidenced on its web-site, USAC's administrative procedures allow for the approval of invoice deadline extensions. The list of "conditions" on USAC's website is not an exhaustive list of the scenarios that support an extension.

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The applicant complied with all other E-Rate program rules for the funding year and has already received services.

We respectfully request approval of our invoice deadline extension requests to allow Southwest Barry County School District R 5 to recover funds committed it that it has already paid for these eligible services.

Granting this deadline extension request the serves the public interest.

Granting this deadline extension request does not promote waste, fraud or abuse.

For the Applicant,

Richard Senturia, CEO
eRateProgram, LLC.