

May 15, 2013

## APPEAL

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

**Re: Request for Waiver: Billed Entity Number 139318; CC Docket No. 02-6**

Ms. Dortch:

The East Carroll Parish Library (Billed Entity Number: 139318) requests a waiver of the Form 486 deadline on its Form 471 Application Number 792248, FRN Number 2164791 and would like to appeal the decision to change the service start date on FRN 2164791 from July 1, 2011 to October 29, 2012. The service start date was changed because the Form 486 was filed for this FRN after the 120-day 486 deadline. Some background on this FRN might clear up why the 486 was not filed until February 26, 2013.

The former director filed the Form 471 on March 15, 2011. FRN 2164791 was for upgraded internet service to the library to be provided by AT&T. Because of unforeseen delays on the part of the service provider in the installation, the service which was to start July 1, 2011 did not start until June 1, 2012. FRN 2164791 was for the new service with AT&T and did not cover the current service with Bellsouth. Because the service had not started, my predecessor did not file a 486 for this FRN. She could not certify that the services had started since they had not with AT&T. A SPIN Change/FRN Split request was filed June 15, 2012 after the upgrade had been completed. The former director was not aware that she should file the 486 at this time. She thought that the 486 could not be filed until after the SPIN Change/FRN Split was approved.

This request was not approved until November 2, 2012, the day after I became director (also, I am completely new to e-rate as I am to the library directorship). I filed a 486 for FRN 2164791 on February 26, 2013 within the 120-day deadline of the revised FCDL date.

The 486 Notification Letter changed the service start date from July 1, 2011 to October 29, 2012 on FRN 2164791 which means that the library is denied \$14,396.18. East Carroll Parish Library is a small, rural library, and e-rate is just one of many duties handled by me as the director. It is easy to see how there would be confusion over when to file the 486 given the circumstances.

I appealed to USAC on April 18, 2013, and received a denial of our request on May 6, 2013. I now ask the FCC to please consider our request to waive the 486 deadline and change the service start date back to July 1, 2011.

The East Carroll Parish Library is in one of the most impoverished areas of our country. In fact, Time Magazine named us the “poorest place in America.” We operate on a very small and tight budget. The loss of this funding will cause severe hardship on the library. We are also the only place in the parish that has free public internet access.

I strenuously ask that you change the service start date and accept our Form 486 that was filed February 26<sup>th</sup>.

Sincerely,

Christina Engel, Library Director  
East Carroll Parish Library  
109 Sparrow Street  
Lake Providence, LA 71254  
318-559-2615

Thank you for your prompt attention to this request.