

**Service Associates, Inc.**

308 South Marshall Street  
Winston-Salem, North Carolina 27101  
828.668.5113 – 336.793.9105 FAX

May 28, 2013

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

**CC Docket No. 02-6**  
**CC Docket No. 96-45**

**Re: Request for Waiver of the Invoice Deadline Extension Request Deadline**

To whom it may concern:

**This Request for Review is filed on behalf of the applicant. My letter of agency is attached. My contact information is as follows:**

Heather Hosey, Compliance Analyst  
Service Associates, Inc.  
308 South Marshall Street  
Winston-Salem, NC 27101  
[hhosey@serviceassoc.com](mailto:hhosey@serviceassoc.com)  
828.668.5113  
336.793.9105 FAX

**Applicant Contact:** Zach Lloyd, Director of Technology  
Greenwood County School District 50  
1855 Calhoun Road  
Greenwood, SC 29649  
[greenwood50@serviceassoc.com](mailto:greenwood50@serviceassoc.com)  
864.941.5429

\*\*\*\*\*  
**Service Associates, Inc. is an E-rate support services company  
providing services exclusively to E-rate applicants.**  
\*\*\*\*\*

**Consistent with Precedent (DA 12-84), this request for review requests that the FCC waive the “Invoice Deadline Extension Request” denied for Form 471 Application Number 745703, so that the District might retrieve this important funding – funding which the District was eligible for, and successfully applied for, before suffering ministerial staff collapse.**

**Regarding:** Administrator’s Decision on Invoice Deadline Extension Request:  
Date of Letter May 9, 2013 & May 8, 2013  
Applicant Greenwood County School District 50  
Billed Entity Number 127224  
Form 471 Application Number 745703  
  
Funding Request Numbers 2052692  
2052687

The **Explanation for Denial** given in the May 9, 2013 & May 8, 2013 “Administrator’s Decision on Invoice Deadline Extension Request” is:

**“Current guidelines and procedures require Invoice Deadline Extension requests to be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension (120 days after the end of the service delivery date). The extension request was not filed in a timely manner, so it is denied.”**

**Grounds for Appeal**

A careful review of the USAC-SLD guidance for “Invoice Deadlines and Extension Requests” in the Reference area of the USAC-SLD web site reveals no deadline for filing an Invoice Deadline Extension Request. It is very clear that there is a deadline for filing Forms 486 and Forms 474, but **there is no deadline stated for the filing of an Invoice Deadline Extension Request**. Nor, is there any outreach warning applicants of an impending invoicing deadline. We have attached a copy of the guidance.

In addition, it was not possible for the applicant to file an invoice deadline extension request by the end of the invoice receipt period because no one in the District was aware that the funding had not been received.

In our examination of the District’s files, we have found no evidence of any USAC-SLD outreach regarding this filing deadline, nor any evidence of any outreach by the service providers for these FRNs.

**Discussion**

The students and teachers of this District have been victimized by an unfortunate series of ministerial and procedural errors due to staff turnover.

In December 2012, our firm was retained for the first time by the District to guide their E-rate application process. While preparing them for FY2013 filing we have been back tracking through their records in attempting to determine why in the past, although they have received funding commitments, they have not received funding.

In our review of the District’s files for FY2006 through FY 2011 we have identified three different District employees who have been contacts on one or more forms. In Fact, we have determined that from February 2009 thru January 2010, there was not a Technology Director working in the district. Former Technology Director, Brian O’Quinn, left in February 2009 and the current Technology Director, Zach

Lloyd, started in January 2010. Please note, a 10 month lapse with no Technology Director. Between February 2009 and January 2010 no one who knew anything about E-Rate was in a position to follow any application through to disbursement.

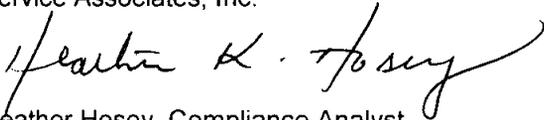
In our examination of the District's files for FY2010, we have found no evidence of any USAC-SLD outreach. We have found no evidence of any Service Provider outreach in this matter. And, no one in the District was specifically over the E-rate desk for as long as 10 months.

The fact is that the District was eligible for this important funding, successfully applied for this funding, timely filed the FCC Form 486 for this funding, and then suffered ministerial staff collapse. We respectfully request that the Invoice Deadline be extended 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.

### Closing

We all thank you for your kind attention to this matter. Please contact me if you have any questions or need additional information.

Sincerely,  
Service Associates, Inc.



Heather Hosey, Compliance Analyst

Attachment: USAC-SLD guidance "Invoice Deadlines and Extension Requests"

Attachment: USAC-SLD Administrator's Decision on Invoice Deadline Extension Request dated May 9, 2013 & May 8, 2013

Attachment: Letter of Agency



USAC Home Schools and Libraries Program Applicants Step 7: Invoicing Invoice Extensions

**STEP 7 INVOICING**

STEP 6

<a href="#">FCC Form 472 Filing</a>	<a href="#">Obligation to Pay</a>	<a href="#">Invoice Check</a>
<a href="#">Invoice Extensions</a>	<a href="#">Invoice Error Codes</a>	

**Invoice Extensions**

If an applicant or service provider has missed the deadline for submitting an invoice – FCC Form 472 (BEAR Form) or FCC Form 474 (SPI Form) – the applicant or service provider must request an extension of the deadline before a new invoice can be submitted.

**Conditions for Extension**

- Authorized service provider changes
- Authorized service substitutions
- No timely USAC notice (e.g., the service provider's FCC Form 486 Notification Letter is returned as undeliverable)
- USAC errors (for example, in data entry) that ultimately result in a late invoice
- Documentation requirements that necessitate third-party contact or certification
- Natural or man-made disasters that prevent timely filing of invoices
- "Good Samaritan" BEAR Forms
- Circumstances beyond the service provider's control

USAC updates the [FRN Extension Table](#) after an invoice deadline extension request has been successfully processed. The extended deadline will appear in the far right-hand column of the search results.

**Requesting an Extension**

To request an invoice deadline extension, send a letter to USAC detailing your request and include the following information:

- Contact person name
- Contact information (including email address)
- FCC Form 471 Application Number
- Funding Request Number (FRN)
- Service provider name
- Service Provider Identification Number (SPIN)
- USAC-assigned Invoice Number (if known)
- Amount of invoice
- Reason for extension request

Requests may be filed by email, fax, or mail. Requests submitted by email will be considered filed on a business day if they are received by USAC at any time up to 12:00 AM (midnight) ET. Requests received after that time will be considered received on the next business day. Similarly, fax transmissions will be considered filed on a business day if the complete transmission is received by any time up to 12:00 AM (midnight) ET.

**Requesting by Email**

To submit a request using [Submit a Question](#), choose "Invoice Deadline Extension Request" from the Topic Inquiry menu and "Other" from the Specific Inquiry menu. You can either type your request in the freeform text box or indicate that you would like to submit an attachment containing your request. USAC will automatically reply to incoming emails to confirm receipt.

**Requesting by Fax**

Requests filed by fax must be faxed to (973) 599-6526. The fax transmission should include a cover sheet listing contact name, phone number and, if available, an email address.

**Requesting by Mail**

Requests may also be filed by mail or other carrier. Send your letter to the following address:

Invoice Deadline Extension Request  
Schools and Libraries - Correspondence Unit  
30 Lanidex Plaza West  
PO Box 685  
Parsippany, NJ 07054-0685

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**SUBMIT**

Forms  
Making Payments

**NAVIGATE**

Home  
About USAC  
Contributors  
Service Providers

High Cost  
Lifeline  
Rural Health Care  
Schools and Libraries

**EXPLORE**

Trainings & Outreach  
Subscription Center  
Careers  
Media  
Appeals & Audits

Forms  
Search Tools  
FCC Orders  
FCC Filings  
Contact Us



Universal Service Administrative Company

Schools and Libraries Division

**Administrator's Decision on Invoice Deadline Extension Request**

May 9, 2013

Heather K. Hosey  
Service Associates, Inc.  
308 S. Marshall Street  
Winston Salem, NC 27101

*Cynthia Hughes  
Cynthia Hughes  
2010 spirit loc*

RE: Greenwood School District 50

RE: SLD Invoice #:	N/A	BEAR or SPI:	N/A
		Invoice Date:	N/A
SLD Line(s) #:	N/A		
Vendor invoice #:	N/A		
FCC Form 471 Application Number:	745703		
Funding Request Number(s):	2052692		
Your Correspondence Dated:	April 3, 2013		

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the invoice number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Invoice Number: N/A                      Line(s): N/A  
Decision on Request:                      **Denied**

Explanation: Current guidelines and procedures require Invoice Deadline Extension requests to be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension (120 days after the end of the service delivery date). The extension request was not filed in a timely manner, so it is denied.

**TO APPEAL THIS DECISION**

You have the option of filing an appeal with USAC or directly with the Federal Communications Commission (FCC).

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
  - appellant name
  - applicant and service provider names, if different than appellant
  - applicant BEN and service provider SPIN
  - **<insert application or form number>** as assigned by USAC
  - Funding Request Number(s) (FRNs) you are appealing if provided in the letter
  - **<insert name of the letter and funding year - both are located at the top of the letter>** AND
  - the exact text or the decision that you are appealing.
3. Please keep your letter to the point and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org) or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us on paper, send your appeal to:

Letter of Appeal  
Schools and Libraries Division - Correspondence Unit  
30 Lanidex Plaza West  
PO Box 685  
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the "Schools and Libraries" section of the USAC website.

If you wish to appeal a decision in this letter to the FCC, you should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in "Appeals" in the "Schools and Libraries" section of the USAC website. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

Schools and Libraries Division

Universal Service Administrative Company

cc: Anthony Stroman, South Carolina Net, Inc DBA Spirit Teleco



Universal Service Administrative Company

Schools and Libraries Division

**Administrator's Decision on Invoice Deadline Extension Request**

May 8, 2013

*Cynthia Hughes  
Cynthia Hughes  
spirit LD 2010*

Heather K. Hosey  
Service Associates, Inc.  
308 S. Marshall Street  
Winston Salem, NC 27101

RE: Greenwood School District 50

RE: SLD Invoice #:	N/A	BEAR or SPI:	N/A
		Invoice Date:	N/A
SLD Line(s) #:	N/A		
Vendor invoice #:	N/A		
FCC Form 471 Application Number:	745703		
Funding Request Number(s):	2052687		
Your Correspondence Dated:	April 3, 2013		

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Invoice Number: N/A                      Line(s): N/A  
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1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
  - appellant name
  - applicant and service provider names, if different than appellant
  - applicant BEN and service provider SPIN
  - **<insert application or form number>** as assigned by USAC
  - Funding Request Number(s) (FRNs) you are appealing if provided in the letter
  - **<insert name of the letter and funding year - both are located at the top of the letter>** AND
  - the exact text or the decision that you are appealing.
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Schools and Libraries Division

Universal Service Administrative Company

cc: Anthony Stroman, South Carolina Net, Inc DBA Spirit Teleco

January 10, 2013

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 Greenwood County School District 50 (127224) has retained Service Associates, Incorporated to advise and assist the District in all matters regarding E-Rate and associated matters effective January 10, 2013, and we hereby authorize you to fully and openly speak and/or correspond with the Service Associates, Inc. Compliance Analysts listed below regarding all matters before USAC-SLD and/or the FCC:

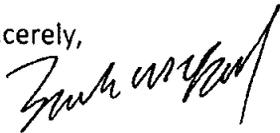
Oliver T. Frail  
Thomas T. Traywick  
Heather K. Hosey  
Jane J. Jones  
Jamie Tomlinson

Additionally, these analysts will serve as the District's Form 471 Block 1 contact person, and as the District's E-rate contact on any other forms and correspondence requested by the District.

This Letter of Agency will be in effect through November 30, 2014, unless canceled or extended by the District, and covers all District applications for all types of services for any Funding Year.

Thank you for your assistance in this matter.

Sincerely,



Zach Lloyd, Director of Computing Services  
Greenwood County School District 50

cc: Oliver T. Frail