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October 17, 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: Ft. Zumwalt School District
BEN: 136949

Form 471 #	FRN	SPIN #	Service Provider
464995	1278551	143025536	Century Tel of Missouri
521403	1435793	143025536	Century Tel of Missouri
578039	1610667	143025536	Century Tel of Missouri

Re: **Request for Review**

USAC Administrator's Decision on Appeal of Invoice Deadline Extension Request(s)
CC Docket No. 02-6 data 08/08/13

Dear Mrs. Dortch:

Fort Zumwalt School District is appealing USAC's Denial of Invoice Deadline Extension Requests and follow up Appeals in letters dated 08/08/13 and earlier having the following reason:

- **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 initial requests and follow up appeals we explained to USAC that the District experienced key leadership turnover beyond its control resulting in changes in its E-Rate program management responsibilities. The person* in the business office whose duties included E-Rate management left the District. Subsequently, the management of the District's E-Rate program was assigned to a person in the Technology Division. This person* had no previous experience or training in the E-Rate process. These changes negatively affected the District's institutional knowledge of E-Rate program rules, regulations, policies, procedures, guidelines and deadlines. Consequently, the District inadvertently failed to file time BEAR forms/Election Letters or Invoice Deadline Extension Requests which resulting in loss of committed funds.

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The granting of this appeal will serve the public interest by allowing the District to capture funding committed to pay its eligible telecommunications services without adversely affecting current or future E-Rate applicants.

Waiver is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule.

We respectfully request the FCC to direct USAC to grant our Invoice Deadline Extension Requests relative to the FRN's above together with reasonable extensions permitting the District to realize the intended benefits of the E-Rate Program and recover funds committed to that it has already paid for eligible services, emphasizing again that the District has not committed any waste, fraud or abuse.

For the Applicant,

Richard Senturia, CEO
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*= Names Available Upon Request