

May 14, 2014

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

Submitted via ECFS  
2 PAGES TOTAL

**CC Docket No. 02-6**

### **Request for Waiver**

On behalf of four clients listed below, CRW Consulting hereby requests a waiver of the Funding Year 2014 471 filing window for the five applications listed in the table at the end of this letter.

The Federal Communications Commission has established precedent in multiple orders (*Acorn Public Library District Order*<sup>1</sup>, *Academy of Math and Science Order*<sup>2</sup>, *Anderson Elementary School Order*<sup>3</sup>) that applicants who met the 28 day mandatory competitive bidding window, and still filed their 471 applications within 14 days of the 471 filing deadline should be considered as properly submitted.

In each case, the below listed appellants waited the mandatory 28-day competitive bidding period, and each of the 471 applications listed below were filed within a 14 day period after the close of the filing window on March 26<sup>th</sup>, 2014.

We ask that the Commission waive the filing deadline for the 5 applications listed below and direct the Schools and Libraries Division of the Universal Service Administrative Company to process these applications as “submitted within the window.”

Respectfully,

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/s/

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<sup>1</sup> *Acorn Public Library District Order, DA 08-2376, Adopted 10/30/2008, para. 5*: Establishing that submission of a 471 application within 14 days is a procedural and not substantive violation. “Because the violation at issue is procedural, not substantive, we find that complete rejection of each of these applications is not warranted. Therefore...because the FCC Form 471 was filed within 14 days after the filing window deadline, we find it in the public interest to waive the FCC Form 471 deadline.”

<sup>2</sup> *Academy of Math & Science Order, FCC 10-122, Adopted 6/7/2010, para. 9*: “...we find that these applications were filed close enough to the deadline so as not to impair the administration of the program.”

<sup>3</sup> *Anderson Elementary School Order, DA 12-796, Adopted 5/22/2012, para. 2*: “We grant the 40 waiver requests...because those petitioners applications...were filed shortly after the filing window closed.”

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<b>Appellant Name</b>	<b>Billed Entity Number</b>	<b>470 #</b>	<b>470 Filing Date</b>	<b>28 Day Waiting Period Met?</b>	<b>471 #</b>	<b>471 Certification Date</b>	<b>Within 14 Days of 471 Filing Deadline?</b>
Locust Grove School District	140142	378730001234834	2/28/2014	YES	993091	4/9/2014	YES
Magnolia ISD	141258	453980001235253	3/10/2014	YES	993020	4/8/2014	YES
Mason School District	140365	363370001186209	12/20/13	YES	992437	4/2/2014	YES
Grand View School Dist. 34	140213	Multiple	Multiple – all met 28 day waiting period	YES	993103	4/9/2014	YES
Grand View School Dist. 34	140213	Multiple	Multiple – all met 28 day waiting period	YES	993109	4/9/2014	YES