

St. Benedict School FCC Waiver Application *for the E-rate Invoice Deadline Extension Rule*

August 12, 2022

School Name: St. Benedict School

Address: 4811 Wallingford Ave N, Seattle, WA 98103-6835

Primary Contact: Susan Lisi, E-rate Coordinator

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Funding Request Information

Billed Entity Number (BEN): 115049

Funding Request Number (FRN): 2099026465

Service Provider: Comcast

USAC FRN Appeal Number: 272371, **USAC Appeal Decision:** Denied

Summary: St. Benedict School is seeking a waiver of the invoice deadline extension rule from the Commission due to extenuating circumstances. St. Benedict School received an invoice from service provider Comcast in March 2022. The invoice requested payment for funding St. Benedict previously returned to USAC in June 2021. This request arrived nine months after the close of the applicable funding year and five months after the extension request deadline of October 28, 2021. Due to the Service Provider's delay in sending the invoice, the school could not meet the USAC deadline to re-apply for the funding due to Comcast. St. Benedict requests a waiver of the Invoice Deadline Date to re-file via the BEAR method for FRN 2099026465. If granted, St. Benedict will submit payment to Comcast and avoid service interruption.

Narrative: St. Benedict School applied for E-rate for the 2020 Funding Year. The school was granted a 40% discount, equaling \$1,319.52 in discounts from their Service Provider, Comcast (FRN 2099026465).

After completing the application process, St. Benedict selected the Service Provider Invoicing (SPI) Method. Under SPI, St. Benedict held that Comcast would invoice USAC and apply the discount directly to their monthly bills. By June 1, 2021, St. Benedict had received \$0 in E-rate Funding; Comcast billed the school the full price for the previous 11 months. With the close of the service year nearing and no funding received, St. Benedict decided to complete a BEAR Form on 6/11/21 (Attachment 1). The school received \$1,055.52 in BEAR funding from USAC on 6/16/21.

Days after submitting the BEAR Form, the school received its June 2021 invoice from Comcast (Attachment 2). Comcast applied 12 months of discounts onto one invoice. In response, the school administrator Susan Lisi promptly returned the \$1,055.52 BEAR Funding to USAC on 6/22/21 (Attachment 3). Ms. Lisi returned the funding to eliminate any duplicative funding (Attachment 4). St. Benedict School did not hear anything further from Comcast or USAC regarding 2020 E-rate funding and believed all was complete for the year.

Nine months later, in March 2022, the school received its monthly invoice from Comcast (Attachment 5). In this invoice, Comcast billed the school for the total 2020 E-rate Funding Discount - \$1,134.51. Comcast stated, "they originally applied the E-rate discount via SPI but had to remove it after the USAC record showed the customer requested funding via the BEAR Method" (Attachment 6). In the three months following receipt of the invoice (April to June 2022), St. Benedict School communicated with representatives at Comcast and at USAC to try to resolve the issue.

St. Benedict met with Comcast employees, including Matt O'Brien, Supervisor of Government Programs. Comcast maintains they cannot make a change in their system as, formally, the USAC record shows the school transitioned to the BEAR Method. Comcast recommended St. Benedict re-file for the funding via the BEAR method to pay the invoice. However, as Comcast billed the school and notified them of this request in March 2022, the October 28, 2021 deadline for Invoice Extension Requests for Funding Year 2020 had long passed.

St. Benedict requested an extension in June 2022 in the E-rate portal, EPC. USAC denied the request as the timeline to file an extension had passed. In response, a USAC Help Desk Representative recommended the school file an appeal. St. Benedict filed an Appeal with USAC

on June 1, 2022 (Appeal Number 272371). USAC Denied the appeal on June 27, 2022 (Attachment 8).

St. Benedict School is presently being billed \$1,134.51 for E-rate Funding they returned to USAC. Further, their Comcast bills now hold notice that the service is eligible for suspension if past due amounts are not paid in full (Attachment 7). St. Benedict School would greatly appreciate the opportunity to be granted an extension to re-file via the BEAR Method for FRN 2099026465 given the aforementioned circumstances. Funding received will be sent to Comcast to clear the school's FY2020 balance and avoid service interruption.

The documents listed below are attached. Highlights reference substantial information. Please email erate@factsmgt.com and erate@stbens.net with any questions or clarifications. We are more than happy to provide any further documentation you request.

Attachment Appendix

1. Attachment 1 – Certified BEAR Invoice - 6.11.2021
2. Attachment 2 – June 2021 Comcast Bill with 1 Year of E-rate Credits
3. Attachment 3 – Receipt, BEAR Funds Returned to USAC - 6.22.2021
4. Attachment 4 – Email Explaining Return - 06.21.2022
5. Attachment 5 – March 2022 Comcast Bill with FY2020 Funding - 03.01.2022
6. Attachment 6 – Comcast Email - Record Changed from SPI to BEAR - 3.30.2022
7. Attachment 7 – July 2022 Comcast Bill with FY2020 Funding
8. Attachment 8 – Appeal Decision_ST BENEDICT SCHOOL Revised Funding Commitment Decision Letter

Contact Information:

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