

June 17, 2021

SUBMITTED ELECTRONICALLY VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Request for Waiver of the Service Delivery Deadline by the Schools, Health & Libraries Broadband (SHLB) Coalition, CC Docket No. 02-6

Dear Ms. Dortch:

On June 15, 2021, John Windhausen, Jr., executive director of the Schools, Health & Libraries Broadband (SHLB) Coalition, and the undersigned counsel spoke via telephone with Ramesh Nagarajan, wireline legal advisor for Acting Chairwoman Jessica Rosenworcel. During the meeting, we discussed SHLB's petition seeking a waiver for special construction projects with a deadline of June 30, 2021.¹

Specifically, the SHLB Coalition asked for expedited relief for applicants for several reasons. If the Commission does not grant the waiver request within the next several days, schools, libraries, and their service providers will have to prepare and submit individual waiver requests to the Commission. That would involve additional, unnecessary work for both the applicants and the Commission. In addition, the applicants and service providers would not be assured that they will receive funds for the work they have done so far. As a result, the service providers may stop working to install broadband services until the Commission has made a decision, so as to minimize any losses due to a denial of funds. Any delay will harm the applicants in the most rural and hard-to-serve areas, as those applicants are the most likely to need additional time to get their broadband services installed.

SHLB also requested that all applicants with a deadline of June 30, 2021, for their special construction project be granted a waiver, regardless of the application's funding year. Challenges related to the COVID pandemic delayed all applicants with initial special construction deadlines of either June 30, 2020, or June 30, 2021. In addition, the funding year of

¹ Request for Waiver of the Service Delivery Deadline by the Schools, Health & Libraries Broadband (SHLB) Coalition, CC Docket No. 02-6 (filed April 23, 2021) (Waiver Request).

an application is not always indicative of when the application received a commitment of funding. A FY 2018 application, for example, might not have received a funding commitment until the middle of 2019 or later. As such, its initial construction deadline would have been June 2020, which was only extended an additional year due to the COVID pandemic.

Granting SHLB's waiver request will not harm any other applicant or the E-rate program. There are numerous funding requests still pending from prior funding years so allowing these applicants additional time would not affect the administration of the program.

Please let us know if you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Gina Spade". The signature is written in a cursive, flowing style.

Gina Spade
Counsel for Schools, Health & Libraries Broadband Coalition

cc: Ramesh Nagarajan
Johnnay Schrieber, WCB
John Windhausen, Jr.