

SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002792

Applicant Information

Applicant FRN	0019623834	Applicant Address	PO Box 8826
Applicant Name	SI Wireless, LLC	Applicant City	Columbia
Applicant Email	leslie.williams@siwirelessllc.c	Applicant State	SC
Applicant Phone	8064441375	Applicant ZIP Code	29202

Contact Information

Is the contact the same as the contact listed on the Application Request for Funding Allocation? If not, please list below.

Contact Name	Leslie Williams	Contact Address	PO Box 8826
Contact Email	leslie.williams@siwirelessllc.c	Contact City	Columbia
Contact Phone	8064441375	Contact State	SC
		Contact ZIP Code	29202

*Indicate which deadline you are meeting with this filing.

2024-07-08

Explanation of Effort and Availability of Commercial Equipment

*Provide an explanation of efforts undertaken, and challenges encountered, in permanently removing, replacing, and disposing of covered communications equipment or service.

According to the FCC website, "The Supply Chain Reimbursement Program (SCRCP) is a \$1.9 billion program created by the FCC at the direction of Congress to reimburse providers of advanced communications services with ten million or fewer customers for reasonable expenses incurred in the removal, replacement, and disposal of communications equipment and services produced or provided by Huawei Technologies Company (Huawei) or ZTE Corporation (ZTE)." SI Wireless participated in this program with the understanding that dismantling their fully functional 204-site network serving rural communities in Western Tennessee and Kentucky to protect national security would be followed by timely reimbursements for the replacement network as per the program guidelines. While SI Wireless has fulfilled its part by removing this potential national security threat, the administrative execution of the program has been lacking.

SI Wireless engaged in the SCRCP Program, aiming to complete it within the mandated 12-month timeframe, expecting timely reimbursements and reasonable responsiveness. However, they faced significant delays and inefficiencies that have threatened their business and livelihoods. Reimbursements for incurred expenses have not been timely, significantly increasing costs and administrative burdens. For instance, SI Wireless is awaiting approval for reimbursement of over 258 invoices totaling nearly \$15 million, with an average invoice age of 189 days. Some invoices have been pending approval for over 628 days, while 145 invoices are still in "Submitted" status without an initial review, the oldest pending for over a year... no review, no comments, just sitting in submitted status for over a year. Since the end of April, the FCC has reimbursed less than \$6,000 of the outstanding \$15 million, which is unacceptable. SI Wireless has had to take out loans to cover expenses, accruing non-reimbursable interest due to the delay in reimbursements.

SI Wireless has completed the decommissioning and destruction of the old network and is about 80% complete on redeploying over 80 replacement sites, including 22 new build towers. The delays in invoice processing and cost modification approvals have caused multiple program extensions. SI Wireless has been waiting over 356 days for FCC approval of cost modifications including the currently pending modification submitted on April 25th. The delay in approval of this modification is preventing the submission of additional invoices totaling over \$30 million for work completed last year. The inefficiencies and delays in the program administration have significantly impacted the network rebuild, public service, and company sustainability.

The Fund Administrator (Ernst and Young) appears to have a conflicting interest, with no incentive to quickly process invoices as they are paid hourly. This results in excessive back-and-forth over minor discrepancies, serial RFIs, and extensive delays in reimbursement. Participants with ongoing government-supplemented cash flow are less impacted by these delays, while SI Wireless, operating on a rip-and-replace basis without ongoing revenue, is significantly affected. The program's reimbursement process should reflect the participants' methods of accomplishment and not be based on incorrect assumptions.

*Explain whether you are finding commercially available equipment in the marketplace. If not, then explain efforts taken to obtain replacement equipment.

Lead times have not changed and are longer on legacy 4G equipment

* If there is additional information relevant to the preceding questions or that you believe the Commission should be aware of, please include the information below.

Furthermore, the program's mandate to use older LTE technologies instead of newer 5G or upcoming 6G technologies is counterproductive, causing the US to fall behind in the technology race. Participants should be promptly reimbursed for reasonably incurred expenses, and the remaining 61% of projected expenses should be addressed. The FCC has 10 years to audit payments, and the current shortfall in timely reimbursements is making it extremely challenging for participants like SI Wireless to replace their networks.

SI Wireless is also burdened by continuous administrative demands and false statements from the program administrators. The company is repeatedly asked to certify payments and provide affidavits, a demand seemingly not placed on other participants. The focus should be on restoring service to customers rather than on unnecessary inquiries. SI Wireless aims to complete the job and receive reimbursement in accordance with program guidelines. However, the current administration of the program is not meeting these expectations, necessitating a change.

****Action Items Requested:****

1. Hold the Fund Administrator accountable for reimbursing reasonable expenses incurred as part of this program.
2. Approve our Cost Modification to continue submitting for reimbursement of reasonably incurred expenses.
3. Accelerate reimbursement of the allocated amount, given it is less than half the funding needed, and future funding is uncertain.
4. Understand our business and treat our circumstances appropriately, considering the extended performance period.
5. Remove the LTE-only policy given the extended performance period and state of technology.
6. Require that government-funded fiber builds allow access to all potential users, including competitors, at the same price.
7. End the practice of serial requests for information that drag out the process.
8. Ensure that those receiving government funds in rural America provide access to competitors at equal prices.
9. Provide guidelines for timely item approval, with responses subject to specific shot clocks.
10. Focus on completing what can be achieved with short funding rather than attacking participants.
11. Fund the remaining 60% of the program to continue network buildout and provide affordable internet to underserved rural communities.
12. End retaliatory actions and work together to fix structural issues in the program administration.

In conclusion, SI Wireless remains committed to providing high-quality, low-cost internet to rural communities despite the inefficiencies and inequalities in the program administration. They continue to build out a comparable network in areas neglected by large telecom monopolies and the US government, even though loans have been necessary to fund progress. The focus should be on restoring service to customers, especially those affected by the cancellation of the Affordable Connectivity Program (ACP), which offered a subsidy for affordable internet. SI Wireless's \$30 flat fee unlimited high-speed wireless internet product is critical for these communities. Lastly, it has not gone unnoticed that we received an In-depth Data Validation and Request for Information unrelated to any invoice immediately following the publication of our

Program Compliance

*Indicate whether recipient has fully complied with (or is in the process of complying with) all requirements of the Reimbursement Program.

Yes No

*Indicate whether recipient has permanently removed from its communications network all covered communications equipment or services that were in the recipient's network as of the date of the submission of the recipient's application request for funding.

Yes No

If recipient has not yet completed the removal process, what estimated percentage of the removal process have you completed?

*Indicate whether recipient has replaced all covered communications equipment or services that were in the recipient's network as of the date of the submission of the recipient's application request for funding.

Yes No

If recipient has not yet completed the replacement process, what estimated percentage of the replacement process have you completed?

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*Indicate whether recipient has disposed of all covered communications equipment or services that were in the recipient's network as of the date of the submission of the recipient's application request for funding.

Yes No

If recipient has not yet completed the disposal process, what estimated percentage of the disposal process have you completed?

*Indicate whether recipient has fully complied with (or is in the process of complying with) the timeline submitted by the recipient. If not, provide explanation for deviation.

Yes No

*The filer has indicated no to a question in this section, please provide additional information.

All covered equipment has not been replaced... we can't even get full reimbursement from our allocation.

Certifications

*By checking the box and providing the electronic signature where indicated below, the Certifying Official on behalf of the filer certifies under penalty of perjury that:

(1) The Certifying Official is authorized to submit this status report on behalf of the above-named filer and, based on information known to me or provided to me by employees responsible for the information being submitted, the information set forth in this status report has been examined and is true, accurate, and complete, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. The Certifying Official acknowledges that any false, fictitious, or fraudulent information or statement, or the omission of any material fact on this status report or on any other document submitted by the filer may subject the filer and the undersigned to punishment by fine or forfeiture under the Communications Act (47 U.S.C. §§ 502, 503(b), 1606), or fine or imprisonment under Title 18 of the United States Code (18 U.S.C. § 1001, §§ 286-287, and § 1343), or can lead to liability under the False Claims Act (31 U.S.C. §§ 3729-3733, and §§ 3801-3812). (2) The filer is in compliance with the statute, rules, and orders governing the Reimbursement Program, including but not limited to allocations, draw downs, payments, obligations and expenditures of money, and the Certifying Official acknowledges that failure to be in compliance and remain in compliance with those statutes, rules, and orders may result in the denial of funding, cancellation of funding commitments, and/or recoupment of past disbursements. The Certifying Official acknowledges that the filer will maintain detailed records, including receipts, of all costs eligible for reimbursement actually incurred for a period of 10 years; and will file all required documentation for its expenses. The Certifying Official acknowledges that failure to comply with the statute, rules, and orders governing the Reimbursement Program could result in civil or criminal prosecution by law enforcement authorities.

Certifier Information

Certifier Signature	LESLIE WILLIAMS	Certifier Phone	8064441375
Certifier Name	LESLIE WILLIAMS	Certifier Email	leslie.williams@siwirelessllc.cc
Certifier Title	PRESIDENT		
Date Signed	2024-07-08		