

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002656

### Applicant Information

Applicant FRN 0031740905 Applicant Address 850 N Hwy 414  
Applicant Name Union Telephone Company Applicant City Mountain View  
Applicant Email FCCLicenseNotifications@un Applicant State WY  
Applicant Phone 3077826131 Applicant ZIP Code 82939

### 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 Sam Hariton Contact Address 10300 Eaton Place, Suite 440  
Contact Email sc.external.rfi.union@widelity.i Contact City Fairfax  
Contact Phone 703-239-3299 Contact State VA  
Contact ZIP Code 22030

\*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.

Union has not conducted removal of covered equipment since the last submittal of this form. Union has performed removal of various Huawei point-to-point microwave radios used for backhauling traffic from its network. Union has not completed any disposal work of covered equipment since the last submittal of this form. Union has retained decommissioned equipment in a warehouse as spares, in the event of an equipment failure or disaster events interrupt service and requires spare equipment be temporarily installed to maintain existing services. Union must operate two networks simultaneously – the new network being constructed, and the Huawei network being decommissioned - to maintain service to rural customers. When Union can safely maintain service to its rural customers with replacement equipment, it will dispose of covered equipment. Yes, Union has conducted replacement work of covered equipment and services since the previous submittal of this form. Union has conducted replacement work for the following categories: Mobile Core, Radio Access Network (RAN), Transport Network (Switching/Routing), Backhaul Network (Microwave), Civil Aspects including towers, shelters, cabinets, power, and related equipment.

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

Overall, Union is finding limited materials and resources available with substantial price increases since the time it applied for allocation. While we would not characterize replacement equipment as readily available at a reasonable price point, we are doing our best to hold the line with equipment vendors. Additionally, equipment lead times have been extended to the point of making certain products likely impossible to procure within the timeline of this program. Continual supply chain impacts occur, which, in conjunction with increased demand results in slower deployment timelines. Union has paid, and continues to pay, well above market value to obtain and expedite procuring replacement equipment. Significant time has been invested by personnel to procure alternate equipment options with mixed success.

\* 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.

The greatest concerns so far are: 1) the uncertainty of complete funding; 2) weather in the Rocky Mountain Region which can cause significant delays in project completion; 3) the challenges associated with permitting and building on federally managed lands pushing work beyond the timelines of the program; and 4) the amount of time the reviews for any modifications made are taking. The sheer volume of modifications due to price and service adjustments of actual costs versus the estimates initially provided for the request for allocation is creating a large administrative burden to all parties. The amount of time to review these adjustments has greatly improved yet still does not line up with the timeline to complete the program. Union continues to be in the unenviable position of being unable to pay its vendors in a timely manner. If the pace of reimbursements and modification request approvals does not continue to increase, Union's vendors could stop working until made whole on financial commitments. In that event Union's project completion timelines will be pushed out even further. The only feasible alternative requires Union burdening itself with unforeseen additional leverage never anticipated in Union's original filing. Taking on additional debt/interest/leverage will push financial commitments past, not only the considerable market cost changes since the program's promulgation, but also the original filing values requested. These alternatives may be avoided should the nature of the reimbursement approvals continue to change for the better. Ultimately, Union cannot accelerate any aspect of the replace/rip project because it cannot make such speculative, and potentially business ending, financial commitments without certainty that the remaining portions of the funding will appear. Currently, time projections based on the Modification review period, at best, reveals that it will take potentially three times the statutory timeline of the entire program.

The disposal of covered equipment is currently on hold from Union. Union does not plan to dispose of any covered equipment until full funding is approved. Due to the delay in full funding, Union must continue to hang onto covered equipment that has been removed to warehouse as spares as we have to operate two networks simultaneously to ensure rural coverage is available and to remain as commercially viable as possible. The delay in full funding is prolonging the disposal of all covered equipment within Union's network.

## 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?

1

\*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?

38

\*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?

0

\*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.

Because the program is only 40% funded, Union has not been able to fully comply with the timeline that was provided in the original 5640 application and it is forecasted that this timeline will not accurately reflect the current program trajectory. In addition, Union has met with incredibly long lead times when filing for permits on federally managed lands and in other governmental permitting districts. The permits on federally managed lands are issued sporadically and inconsistently from office to office making it extremely difficult to get work done in a consistent and timely manner. Union has deviated from all sections of the previously mentioned timeline due to delays in funding 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      Eric Woody

Certifier Phone    3077470007

Certifier Name    Eric Woody

Certifier Email    ewoody@unionwireless.com

Certifier Title    CEO

Date Signed      2024-06-26