



April 8, 2024

Via Electronic Filing

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

RE: Interoute US, LLC, Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89; Request for Confidentiality

Dear Ms. Dortch:

Pursuant to sections 0.457, 0.459, and 1.50004 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §§ 0.457, 0.459, and 1.50004, EXA Infrastructure US, LLC (formerly known as Interoute US, LLC; hereinafter "EXA" or "the Company") respectfully requests that the Commission withhold from public inspection and grant confidential treatment for the redacted portions of the attachment to this letter, Status Update Report SC-SU0002561. EXA understands that certain information is made available to the public relating to Status Update filings, and requests that this information, and any information from the attached Status Update that may be made available to the public in the future, be kept confidential.

In support of EXA's request for confidential treatment and pursuant to Section 0.459(b) of the Commission's rules, EXA hereby states as follows:

**1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT.**

EXA seeks confidential treatment of the redacted portions of the above-noted Status Update.

**2. IDENTIFICATION OF THE COMMISSION PROCEEDING IN WHICH THE INFORMATION WAS SUBMITTED OR A DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.**

EXA is providing confidential commercial information in connection with the required Status Update.

**3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED.**

EXA seeks confidential treatment for sensitive commercial information. Public disclosure of this information could result in substantial competitive harm.

**4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION.**

The information contained in the attachments for which EXA requests confidentiality relates to equipment currently that has been removed from the network over which it provides telecommunications service.

The services provided by EXA are subject to intense competition from a variety of third-party service providers.

**5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM.**

As noted above, public disclosure of this information could result in competitive harm, as EXA's competitors could leverage the information to their advantage.

**6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE.**

EXA has not released the information contained in the Status Update to the public.

**7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES.**

The information contained in the Status Update is not available to the public and EXA has not previously disclosed the information to any non-governmental third parties, other than counsel and contractors for purposes of preparing this filing.

**8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE.**

EXA requests that the material in the Status Update be treated as confidential for five (5) years or as long as the Supply Chain Reimbursement Program continues to make information available to the public, whichever is longer.

**9. OTHER INFORMATION THAT EXA US BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.**

EXA believes that the information provided above is sufficient to determine that its request for confidentiality should be granted.

Please do not hesitate to reach out with any questions you have regarding this filing.

Respectfully submitted,

**EXA Infrastructure US, LLC**

**(f/k/a Interoute US, LLC)**

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Jocelyn Cho  
General Counsel

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002561

## Applicant Information

Applicant FRN	0030287973	Applicant Address	91 Commercial Street
Applicant Name	EXA Infrastructure US LLC	Applicant City	Lynn
Applicant Email	jocelyn.cho@exainfra.net	Applicant State	MA
Applicant Phone	5712254845	Applicant ZIP Code	01905

## 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	Jocelyn Cho	Contact Address	91 Commercial Street
Contact Email	jocelyn.cho@exainfra.net	Contact City	Lynn
Contact Phone	2028357523	Contact State	MA
		Contact ZIP Code	01905

\*Indicate which deadline you are meeting with this filing.

2024-04-08

## 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.

- As noted in previous status reports, EXA (formerly known as Interoute) received all of the Ciena equipment identified as necessary for the removal process by May 2023.

- EXA has replaced all underlying Huawei equipment in the New York and Boston metro areas with Ciena equipment, although there is still a very small amount of work being done on the migrations of services (e.g., individual customer circuits) that pass over this underlying equipment. The vast majority of traffic (est. 95%) has also already been migrated. [REDACTED]

- EXA has completely removed all covered equipment from the following locations: [REDACTED]

[REDACTED] The company has also removed substantial equipment from other PoPs in its network.

- EXA will have removed over 98% of all covered equipment from its networks by the end of April 2024, though a few remaining pieces will be removed in May 2024 during a final sweep for equipment removal. [REDACTED]

- Also as noted in earlier status reports, EXA has engaged with ATR for disposal tasks. Covered equipment that has been removed is either picked up by ATR at local PoPs or transported to, and stored at, an EXA location to await pick-up by ATR. ATR has done eight (8) pick-ups to date for approximately 54% of the removed equipment, with more to come.

## REDACTED FOR PUBLIC INSPECTION

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

Although there were supply chain delays throughout the project, EXA has generally been able to find equipment from Ciena Communications ("Ciena"), which the company has been using in its North American network for several years. As described in earlier status reports, the company must stick with Ciena to ensure the network works together as a whole, i.e., it is neither easy nor practical (or possible) for EXA to mix and match equipment from vendors other than Ciena.

REDACTED FOR PUBLIC INSPECTION

\* 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.

As described above, EXA will have removed the bulk of the covered equipment (approx. 98%) by the end of April 2024, with the last elements to be removed by May 2024.

## 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?

98

\*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?

95

\*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?

54

\*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.

As described above, EXA has removed (98%) and replaced (95%) nearly all covered equipment, and remaining tasks (including disposal) will be completed in the coming weeks.

## 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	Jocelyn Cho	Certifier Phone	202-835-7523
Certifier Name	Jocelyn Cho	Certifier Email	jocelyn.cho@exainfra.net
Certifier Title	General Counsel		
Date Signed	2024-04-08		