

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002550

### Applicant Information

Applicant FRN 0020528535

Applicant Address 105 Edgeview Drive

Applicant Name Gogo Business Aviation LLC Applicant City Broomfield

Applicant Email bgordon@gogoair.com Applicant State CO

Applicant Phone 2026800576 Applicant ZIP Code 80021

### 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 Mike Rupert

Contact Address 105 Edgeview Drive

Contact Email rnr@gogoair.com

Contact City Broomfield

Contact Phone 6304175109

Contact State CO

Contact ZIP Code 80021

\*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.

- Gogo is continuing to work with its ground-based network vendor selected to provide replacement network components and equipment
  - o Gogo is set to receive the preliminary order of initial quantities of replacement ground-based network equipment (11x total “cell sites”) in the April 2024 timeframe – these sites will be installed in Gogo’s planned “Test Bed” site locations and Chicago/Broomfield-based lab facilities

The network antennas included in this preliminary order have been accepted by Gogo and are being stored until they are needed for installation activities

- o Gogo has worked with its ground-based network vendor to re-organize CDR (Critical Design Review) milestones for replacement network equipment design  
{[CONFIDENTIAL INFORMATION BEGINS Gogo has learned from its vendor that software development to enable deployment and readiness of the replacement network is delayed; driven by the vendor’s inability to demonstrate compliance against the replacement solution’s specifications, agreed to by both parties at the start of the program

Despite the delay noted above, CONFIDENTIAL INFORMATION ENDS}] Gogo and its vendor have completed the first CDR phase, “Antenna CDR”, and are beginning preparation efforts for the next CDR milestone, “Shelter Equipment CDR”, focusing on replacement network equipment to be installed inside the shelter buildings at Gogo’s network cell site locations

- This milestone will also coincide with preliminary installation/deployment and testing performed with Gogo’s “Test Bed” sites in the field
- {[CONFIDENTIAL INFORMATION BEGINS Entry to this phase of the program, and the associated milestone review meeting are estimated to occur later this year, in the June-July, 2024 timeframe, subject to readiness and criteria being met by Gogo’s vendor

Despite continued efforts to mitigate delays in the Project Timeline, Gogo remains reliant on the vendor to meet the various technical requirements for both hardware and software prior to undertaking any deployment or replacement activities of its network.

The vendor’s work for Gogo, and thus Gogo’s rip and replace timeline, may be impacted by the vendor’s April 1, 2024 announcement that it has filed Chapter 11 proceedings in U.S. Bankruptcy Court. Gogo is monitoring the proceedings to determine the impact to Gogo, if any. CONFIDENTIAL INFORMATION ENDS}]

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

As was the case in previous Status Reports, Gogo is continuing to monitor and track lead time constraints communicated by its selected ground-based equipment vendor:

- At this time, the issue previously noted regarding Gogo's vendor's manufacturing ability to support the production of the replacement network equipment allocated for the preliminary order of Lab and Test Bed site use (11x systems) has been resolved § It is Gogo's understanding that the delayed 28-30 week lead time constraints for delivery of replacement network equipment at scale, recently communicated by its vendor, are still valid at this time – Gogo will continue to work with its vendor to understand any further changes to equipment delivery lead times

As mentioned previously in Status Reports and included in Gogo's recently-approved March 22, 2024 Extension Request ("March 2024 Extension Request"), it is important to remember that Gogo's use case is unique not only because it must replace its ground-based terrestrial "ATG" network to remove the targeted ZTE equipment, but, as a result, it must also replace the airborne equipment installed on customer aircraft that connects to the ground-based ATG network to provide inflight connectivity to passengers.

To be compatible with Gogo's replacement ATG network, aircraft must be outfitted with, at a minimum, a specific baseline version of aircraft hardware; otherwise, Gogo's existing customers will be left with non-functioning equipment on their aircraft after Gogo's "flash" cutover to its forthcoming non-ZTE network. This is in part due to Gogo's limited spectrum holdings, which does not allow it to operate its legacy ZTE network and its new network at the same time.

To support the replacement of current airborne equipment, Gogo is reliant on a network of highly-specialized partner Maintenance & Repair Organizations ("MROs"), which support aftermarket installation, repair, and maintenance for the aviation market. Mirroring the aviation market more broadly, Gogo's MRO partner network continues to experience supply chain constraints and labor shortages. As a result, Gogo customers may experience longer lead times and delays when seeking to replace airborne equipment in connection with the Reimbursement Program, despite efforts by Gogo and its MRO partner network to encourage customers to schedule replacement of the airborne equipment in support of the projected timeline. While Gogo has begun assisting customers with the necessary airborne equipment swaps, Gogo will need to continue to monitor progress with its customer installation initiatives, especially amid the MRO labor shortages, which risk delaying this process.

Overall, the decision for Gogo's customers to replace airborne equipment on their aircraft amidst Gogo's network replacement efforts, is a planned, budgeted, and schedule-based decision made at the sole discretion of the aircraft operator. As such, this activity has been communicated and highlighted by Gogo as a requirement for customers to maintain inflight connectivity service on their aircraft, but ultimately falls outside of Gogo's direct control.

\* 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.

Gogo has continued to make progress with the submission of reimbursement requests pertaining to removal and replacement of ZTE equipment, and overall program participation – including providing substantiating documentation to accompany these requests:

- Gogo continues to file and receive approval for program application amendments, to revise pricing and details associated with several components and services tied to network replacement efforts and activities; expectation is that these efforts will continue throughout the project, as needed
  - Gogo continues to work with Summit Ridge Group to support and assist with the reimbursement process
  - Gogo may desire to continue to have coordination/communication with E&Y to better understand certain aspects of, and to better align planned documentation and execution activities within the intended reimbursement process, especially due to the nature of Gogo's business that is unique relative to other applicants in the program
- Additionally, Gogo has continued to make progress on the following initiatives/activities:
- Gogo is continuing to work with various vendors to enable continued field cell site acquisition and preparation activities, ahead of deployment; it is expected that these efforts will continue throughout the project lifecycle
  - {[CONFIDENTIAL INFORMATION BEGINS Gogo is continuing to work with its selected vendor to perform a "trial run" of ZTE equipment destruction; encompassing broken/damaged equipment returned from the field, for Gogo's existing EVDO network operations

- o Ongoing coordination for this effort has led to refinement of equipment serial numbers in the context of determining at which level of detail these numbers must be tracked and recorded throughout the destruction process – if not available already at the time of this report's submission, Gogo will soon be opening an FCC Help Desk ticket to receive further clarification on these requirements

- o The intended "trial run" for equipment destruction is delayed until these additional requirements are received and understood CONFIDENTIAL INFORMATION ENDS]}

In general, Gogo has continued to execute against program plans; mainly in the areas of equipment sourcing/ordering, equipment/network design and viability, reimbursement request submission, and airborne equipment/customer conversion. As noted above, Gogo filed and obtained approval for its March 2024 Extension Request. As it explained therein, Gogo's original program application timeline accounted for several Extension Requests. The progress made thus far is reflective of expected activities executed against that original timeline.

Furthermore, Gogo continues to assess the impact on its Project Timeline of the absence of further information regarding the "full funding" status of the Secure and Trusted Communications Networks Reimbursement Program ("SCRIP"), along with the vendor and partner-based factors listed above. Gogo continues to require prompt reimbursement payments for requests submitted, to balance the overall finances of participating in the program. As a result, there may be a need in the future to update the Project Timeline and associated milestones to reflect any potential impact to the Project Timeline that may result because of the lack of clarity regarding "full funding" of the SCRIP. If the Project Timeline needs to be modified given the foregoing, Gogo will work with the FCC to ensure that any updates to the Project Timeline are understood.

## 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?

0

\*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?

0

\*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.  
Please see responses included earlier in this Status Report for further detail.

## 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	Crystal L. Gordon	Certifier Phone	303-301-3289
Certifier Name	Crystal L. Gordon	Certifier Email	cgordon@gogoair.com
Certifier Title	Executive Vice President and C		
Date Signed	2024-04-06		