

SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002351

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.

2024-01-06

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 our ground-based network vendor selected to provide replacement network components and equipment

oGogo has placed a preliminary order with said vendor for initial quantities of replacement ground-based network equipment (11x total “cell sites”) – to be installed in Gogo’s planned “Test Bed” and Chicago/Broomfield-based lab facilities (background on these locations were included in the last submitted status report on 8 October, 2023 (the “Previous Status Report”))

The network antennas included in this preliminary order have been shipped by our vendor, and are currently being stored in the vendor’s warehouse, for future delivery acceptance by Gogo

All other network equipment included in this preliminary ground-based equipment order have now passed FCC certification grant testing (which was delayed as outlined in the Previous Status Report). The vendor recently informed Gogo of additional delays, however, due to re-design efforts initiated by our vendor to meet certain contractual and regulatory requirements. As a result of the re-design efforts, the vendor now expects to deliver the network equipment to Gogo by Q2 2024. The vendor initially expected to deliver the equipment to Gogo by early-January 2024 subject to limitation from their own supplier (as discussed in greater detail in Section 2 below). Gogo is working in cooperation with the vendor to mitigate any delays associated with the re-design efforts.

oGogo is continuing to work with our ground-based equipment vendor to re-organize CDR (Critical Design Review) milestones for replacement network equipment design in a way that minimizes technical risk and risk associated with replacement activities for Gogo

Along these lines, Gogo and the ground-based equipment vendor are aligning on a revised “3x CDR” approach, which will focus on various technical areas of the ATG connectivity ecosystem:

- Antenna CDR – to focus on replacement network antenna equipment, to be installed on Gogo’s cell site towers

oThis CDR milestone was recently completed by Gogo and the vendor; the collective team is actively working to complete phase exit-critical actions in an effort to fully complete this project phase

- Shelter Equipment CDR – to focus on replacement network equipment to be installed inside the shelter buildings at Gogo’s network cell site locations

oThis CDR milestone will be scheduled once the vendor can show end-to-end cellular connectivity with 3GPP-defined functionality

oThis milestone will also be used as entrance criteria to be completed ahead of Gogo deploying “Test Bed” sites in the field

- Systems CDR – to focus on SW-based features and functions that apply directly to the “Gogo-specific air-to-ground customizations” that our selected vendor will be building, to satisfy Gogo’s use case

oThis CDR milestone will be scheduled once the vendor is able to show full compliance to Gogo’s defined SRS (System Requirements Specification) for the ATG ecosystem

oThis milestone will also be used as entrance criteria to be completed ahead of Gogo initiating full network replacement activities

- It should be noted that the “3x CDR” approach that Gogo and the vendor have agreed to as outlined above was instituted to mitigate potential delays in the Project Timeline (Gogo’s expected duration for project execution as outlined in Gogo’s application filed with the FCC). The “3x CDR” approach requires the vendor to demonstrate full functional system compliance against the SRS (System Requirements Specification)

*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 the Previous Status Report, Gogo is continuing to monitor and track lead time constraints communicated by its selected ground-based equipment vendor:

- Gogo's selected ground-based equipment vendor received pushback from their solution manufacturer on the ability to support the manufacturing of the replacement network equipment allocated for the preliminary order of Lab and Test Bed site use (11x systems) – stating that they won't manufacture these systems until they receive a manufacturing demand for more systems (tied to a larger order, likely at the scale of what is needed for Gogo's full replacement network deployment efforts)
- Gogo's selected ground-based equipment vendor also received feedback from their solution manufacturer on overall lead times associated with delivery replacement network equipment at scale; Gogo's original SOW (Statement of Work) with its selected ground-based equipment vendor states a 26-week lead time for such equipment, however, current quoted times are now coming in at 28-30 weeks, which also assumes the parties are able to resolve the supplier's concerns about the purchase order's limited volume

As mentioned previously, Gogo's use case is unique in the sense that not only the ground-based terrestrial "ATG" network must be replaced to remove targeted equipment, but also the airborne equipment installed on customer aircraft, which then connects to the ground-based ATG network to provide inflight connectivity to passengers, must also be replaced. This is a requirement due to network compatibility, in which the replacement network must operate with a specific minimum version of aircraft hardware or later; otherwise, Gogo's existing customers will be left with non-functioning equipment on their aircraft after Gogo's cutover to its forthcoming non-ZTE network. This is also due to Gogo's limited spectrum holdings, which does not allow it to operate its legacy ZTE network and its forthcoming network at the same time. To support these airborne equipment replacement activities, Gogo relies on a network of "partner MROs" (Maintenance & Repair Organizations) who typically support aftermarket equipment installation, repair, and maintenance for the Aviation market. Gogo customers must rely on MROs to perform highly-regulated equipment replacement activities, as directed and mandated by the FAA. Gogo regularly engages with its MRO partner network to gauge progress and viability to support the required airborne equipment activities tied to network replacement and participation in the SCRP Program. Similar to the aviation industry more broadly, the MRO partner network continues to experience labor shortages and supply chain constraints. As a result, Gogo customers may experience longer lead times and delays when seeking to replace airborne equipment in connection with the SCRP Program. In collaboration with its MRO partner network, Gogo continues to encourage Gogo customers to schedule replacement of the airborne equipment as soon as possible in support of the Project Timeline. Gogo will continue to provide updates on this topic as they become available.

* 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 has been engaged with the FCC and E&Y on multiple topics pertaining to these efforts, and has had productive ongoing dialogue regarding clarification of items to be reimbursed, and how they pertain to Gogo's specific use case for network replacement
- Gogo has also filed and received approval for several program application amendments, to revise pricing 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 with and assist 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
- Gogo has selected a vendor to support ZTE equipment destruction, following removal/decommission from existing field sites; a "trial run" for the delivery of removed equipment and destruction with this vendor is now targeted for completion by mid-February 2024

In general, Gogo has continued preliminary activities pertaining to program execution; mainly in the areas of equipment sourcing/ordering, equipment design and viability, reimbursement request submission, and airborne equipment/customer conversion. Despite this progress, Gogo continues to assess the impact on its Project Timeline absent further information regarding the "full funding" status of the SCRP Program, 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 SCRP Program. 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.

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	2024-01-05		