

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002378

### Applicant Information

Applicant FRN 0030287973

Applicant Address 91 Commercial Street

Applicant Name Interoute 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.

2024-01-06

## 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.

- As noted in previous status reports, Interoute has received all of the Ciena equipment identified as necessary for the removal process. The last of the Ciena equipment required for completing the phase-out of covered equipment (in this case, on certain circuits that have one end in the U.S. and one end in Canada) was received in May 2023.
- Interoute described in its earlier status reports the hiring of engineering staff to fill a vacant position and also a new position early this year. Both of the new engineering staff have now been onboarded and are effective members of the team.
- Interoute has completed the replacement of all underlying Huawei equipment in the New York and Boston metro areas with Ciena equipment, although there is still work being done on the migrations of services (e.g., individual customer circuits) that pass over this underlying equipment. That effort is progressing well, with the bulk of traffic (est. 85%) already migrated. There are still some sections of the New Jersey metro area in which the underlying equipment has still to be replaced, but Interoute already has the equipment available for install and it is a matter of scheduling maintenance windows to complete this work. Interoute has completely removed all Huawei equipment from the following locations, which comprise approximately 53% of Interoute’s major PoP sites: 165 Halsey Street in New Jersey; 350 Cermak in Chicago; 21715 Filigree St. in Ashburn, VA; 111 8th in New York, NY; 410 North Broad St. in Philadelphia, PA; 11 North Pearl in Albany, NY; 32 Avenue of the Americas in New York, NY; 350 Main St. in Buffalo, NY; and 194 Washington in Albany, NY. Interoute has also removed substantial equipment from the other PoPs.
- Due to ongoing issues with scheduling maintenance windows that suit all customers, problems during maintenance, equipment/software issues, and other priority projects being run in parallel, Interoute believes that it will have removed over 95% of all Huawei equipment from the United States by the end of February 2024 though the remaining items (which are the most challenging) will not be removed until April 2024. Interoute unexpectedly had to prioritize exiting a large cage on the 9th floor in 165 Halsey with all equipment having to be removed, not only Huawei equipment. This project is now complete which will allow the engineering team to have more focus on completing the Huawei removal project. A further reason for delay has been that it was not possible to arrange maintenance windows during the holiday period as there is a yearly network freeze (moratorium period) from early December 2023 to early January 2024.
- Also as noted in earlier status reports, Interoute executed a contract with Advanced Technology Recycling (“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 Interoute location to await pick-up by ATR. The table below provides a summary of the pick ups of Huawei equipment by ATR to date:

Original Quantity of Items 2022	Location of Pick Up	Quantity	Disposed of
		3799	N/A
Pick Up 1: 12th July 2022	Lynn	361	YES
Pick Up 2: 14th July 2022	Lynn	428	YES
Pick Up 3: 21st June 2023	Albany	230	YES
Pick Up 4: 14th November 2023	Buffalo	107	TBA
Pick Up 5: 16th November 2023	Ashburn	248	TBA

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

Interoute has generally been able to find equipment from its chosen vendor Ciena Communications ("Ciena"), which Interoute has been using in its North American network for several years. As described in Interoute's earlier status reports, it must stick with Ciena to ensure the network works together as a whole, i.e., it is neither easy nor practical (or possible) for Interoute to mix and match equipment from vendors other than Ciena.

Interoute has received all of the equipment that was ordered from Ciena in connection with the removal project, despite severe supply chain issues that pushed out the project in the early stages. Interoute is still in the process of removing and disposing of the covered equipment and replacing it with the Ciena equipment that is in its inventory. The company continues to be in regular contact with Ciena.

\* 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.

Interoute's projected timeline for replacing all covered equipment within its network has been pushed to April 2024, but the bulk of the equipment (approx. 95%) will have been removed by February 2024. The reason why Interoute anticipates April 2024 as the date by which Huawei will be completely removed from the network is that the last 5% of the equipment is the most challenging and complex equipment to replace. To date, Interoute have been focusing on the parts of the project that are the most straightforward while dealing with the difficulties they have been experiencing with maintenance window postponements, technical difficulties and balancing resources between this project and other priority projects.

## 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?

85

\*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?

85

\*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?

36

\*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	Jocelyn Cho	Certifier Phone	2028357523
Certifier Name	Jocelyn Cho	Certifier Email	jocelyn.cho@exainfra.net
Certifier Title	General Counsel		
Date Signed	2024-01-08		