

April 5, 2024

### Mediacom Communications Corporation (FRN 0008687915)

### WC Docket No. 18-89

### Re: Request for confidential treatment pursuant to 47 C.F.R. $\delta$ 0.457 and $\delta$ 0.459

Mediacom Communications Corporation ("Mediacom", "Company") respectfully requests that segments of the information submitted herewith be granted confidential treatment.

The Company requests that such information be held in strict confidence pursuant to 47 C.F.R.  $\delta$  0.457 and  $\delta$  0.459 of the Commission's rules and not be made available for public inspection.

Mediacom is furnishing sensitive business information that is confidential and proprietary to the Company as "trade secrets and commercial or financial information" under 47 C.F.R.  $\delta$  0.457(d). Public disclosure of this information would reveal sensitive financial, operational, and procedural information essential to the Company's confidential and proprietary business operations, thereby negatively impacting the Company's competitive position with respect to other network operators and vendors.

Confidential treatment is being requested for the following SCRP document:

File No: SC-SU0002541 Dated 2024-04-05

I have enclosed a redacted copy of the filing for your review. Thank you for taking the time to consider this matter.

Sincerely,

Greg Euker, Group Vice President of IP Networks Mediacom Communications Corporation geuker@mediacomcc.com +1-845-443-2761

# SCRPStatus Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002541

# Applicant Information

Applicant FRN 0008687915 Applicant Address One Mediacom Way

Applicant Name Mediacom Communications C Applicant City Chester

Applicant Email bgluckman@mediacomcc.cor Applicant State NY

Applicant Phone 8454432650 Applicant ZIP Code 10918

## **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 Greg Euker Contact Address One Mediacom Way

Contact Email ota-fcc@otadvisors.com Contact City Chester

Contact Phone 8454432761 Contact State NY

Contact ZIP Code 10918

2024-04-08

<sup>\*</sup>Indicate which deadline you are meeting with this filing.

## 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.

Mediacom Communications Corporation (MCC) is fully engaged in its effort to remove, replace, and dispose of all covered equipment listed in its SCRP application. Internal and external resources continue to be engaged across all business, operational and engineering disciplines to expedite this program execution separately from ongoing "business-as-usual" activities. To date, 99% of the program has been completed across the areas of removal and replacement, and 55% of equipment has received disposal certification.

even as supply chain issues brought about by the ongoing COVID pandemic and global component shortages significantly impacted the ability to procure, install and make operational commercially available routing, switching and optical replacement equipment and components from 2019 through 2023.

Additionally, these same carrier customers have been slow to support large scale migrations of their network services to supported solutions (particularly in cellular towers and associated switching centers). MCC has endeavored to find ways to mitigate the impact of these issues on its schedule and in all cases has been able to continue to move toward delayed completions. These factors continue to have impacts well into 2024.

All the delays noted above impacted the downstream removal and destruction activities since all services must be migrated before any removal or destruction work can commence

The process for cost modification revision, modification approval, claims submission, claims approval, and claims payment has been more time consuming than originally estimated.

Another area of impact to the timeline involves the ongoing uncertainty associated with the SCRP program being fully funded by Congress. MCC requested over \$86MM in funding as part of its original application submission. However, the program allocated only \$34MM to MCC against its \$86MM request due to an underestimation of the number applicants requesting participation in the program. MCC has continued to push forward with its plan to remove Huawei from its networks, but the funding uncertainly had an impact on the rate at which MCC pursued its equipment purchases in 2023. Understandably, the process slowed as MCC monitored the risk associated with the overall program remaining underfunded as Congress and FCC continue to work to resolve the gap.

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

In its application timeline, MCC anticipated ordering, receiving, and installing the remaining replacement equipment in Q2 of 2021 and completing such installation by the end of Q2 2022. MCC, in late 2020, engaged with OEM vendors of its required replacement equipment early in the procurement process by providing detailed requirements for model and quantity up to 90 days before the issuance of firm orders. The goal was to get MCC needs forecasted early in the OEM production planning to avoid extended delivery intervals. Each OEM gave commitments to the timelines MCC had requested.

The equipment delivery delays significantly impacted the original MCC timeline for completion of removal, replacement and disposal of its installed Huawei covered equipment. Obviously, equipment could not be removed, services activated, subscribers migrated, and covered equipment disposed of until the replacement equipment was available. MCC worked closely with its OEMs, installation, engineering, and professional services vendors to mitigate any issues.

MCC has confidence that removal, replacement, and disposal of all covered equipment will be complete before its July 15, 2024 deadline.

* If there is additional information relevant to the preceding question Commission should be aware of, please include the information below.	s or that you	believe the

ProgramCompliance
*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 recipients 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?
99
*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?
99
*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?
55
*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.

See information under the section entitled "Explanation of Effort and Availability of Commercial Equipment" above.

### 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 abovenamed 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 Greg Euker Certifier Phone 8454432761

Certifier Name Greg Euker Certifier Email geuker@mediacomcc.com

Certifier Title Group VP of IP Networks

Date Signed 2024-04-05