

SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002397

Applicant Information

Applicant FRN 0031577000

Applicant Address 1224 W Platte Ave

Applicant Name NE Colorado Cellular Inc

Applicant City Fort Morgan

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Applicant State CO

Applicant Phone 9705423605

Applicant ZIP Code 80701

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 Summit Ridge Group, LLC

Contact Address 49 West 38th Street, 12th Floor

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Contact City New York

Contact Phone 2124334800

Contact State NY

Contact ZIP Code 10018

*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.

Site Prep Status: Viaero began the site work required prior to Ericsson's installation activity. Viaero has also established internal procedures for executing the project plan (RAN and MW), including setting quality control standards for supervising vendors. As of the date of this report, Viaero has completed the following: Electrical:686/731, Shelter Upgrades:11/13, Concrete Pads:16/76, Access Road Prep:6/39, Generator Replacements:298/578, Permitting:650/885, Lease Negotiations:10/90, NEPA/NHPA:550/614.

Core Deployment Status: Major Milestone Achieved: Core deployment completed in Ft. Morgan and Grand Island switching centers, all migrations completed, stabilization completed, and integration of RAN / Transport Network has begun. Viaero and Ericsson recognized the need to start the Core Project in advance of the application approval and both companies agreed to start the full Core Project in August 2021, with the ordering of hardware and start of the high-level design. As of this report, the Core project is 100% completed. All onsite hardware and software have been delivered, installed, and commissioned. Integration and Acceptance Testing is 100% completed. The ATP (Acceptance Test Plan) is 100% completed. The traffic that was on Huawei Core has been migrated over to Ericsson Core completed in March 2023. Monitoring and Stabilization have been completed. Ericsson's LTE Sites have started to be turned up on the Ericsson Cores. All LTE (Long Term Evolution) RAN (Radio Access Network) (Ericsson and Huawei) have been rehomed to the Ericsson Cores.

RAN Deployment Status: Viaero and Ericsson agreed to start the RAN Project in a limited scope in Oct. 2021. This scope included the individual RAN site surveys by use of drones where practical, RF (Radio Frequency) Design, limited hardware ordering, site hardware configurations, cutover planning, and limited Construction Drawings of the baseline cluster. The baseline cluster started the installation of RAN equipment in July 2022. 169 Sites were cut over to as of the date of this status report.

The current status of the RAN Deployment of the Ericsson LTE network is the following: RFDS (Radio Frequency Design Sheets) Completed: 875/887, CDs (Construction Drawings) Approved: 533/887, CX (Construction Start) NTPs (Notice to Proceed) Received: 383/887, CX Start: 279/887, CX End: 216/887, Integration Completed: 304/887, Cutover Completed: 169/887, Prohibited Equipment Removed: 0/887

Transport Deployment Status: Viaero and Ericsson agreed to start the Transport Project, in a limited scope, in Oct. 2021. This scope included the individual site surveys by use of drones where practical, link design, PCN coordination with the FCC, limited Construction Drawings, IP design, link hardware configurations, and a limited amount of hardware orders.

The current status of the Transport Deployment of the Ericsson transport network is the following: NTP Microwave Link: 323/597, PCN (Prior Coordination Notice process) Complete: 315/597, NTP Construction: 295/597, Construction Start: 161/597, Build Complete: 104/597.

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

Equipment orders have been limited at this stage in the project due to the pro-rated funding appropriated to the Program. Viaero remains concerned about future equipment availability when order quantities increase, particularly if the project funding is not timely resolved. If the reimbursement fund is not fully funded in the coming months, Viaero will be forced to cancel or postpone equipment orders due to an inability to pay invoices without the assurance of reimbursement. Another risk to our completion deadline is the current FCC policy to freeze reimbursements in an entire application during the review of individual line-item amendments. By withholding reimbursements from line items that are unrelated to line items being amended, the FCC is delaying reimbursement such that it jeopardizes our ability to place and pay for equipment orders in a timely manner. Even if this policy is modified, if the reimbursement process is not further streamlined so that payments can be made more promptly, that will also result in deadline risks and the need for build extension. In addition, it has been difficult to identify and hire qualified, experienced telecommunications engineers and project managers. Training inexperienced individuals will put pressure on Viaero's build deadlines, which may result in needing a deadline extension.

* 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 Viaero/Ericsson began actual site scoping, new issues would arise specific to towers being scoped. This has delayed the implementation work that Viaero hoped would be accomplished prior to the sub-optimal winter season.

Viaero is also constrained by the funding limitation - this challenge, unless resolved, will pose an increasing threat to our program in the coming months.

Direct Challenges to the Speed and Efficiencies of the Rip and Replace Program:

1. Labor Shortages – As tower crews have been reduced due to the pro-rated funding and the 40% appropriation, existing contracted crews that are being removed from this Project are being assigned to other ongoing deployments across the country, and it will become challenging to find qualified crews to complete this Project.
2. Lack of Full Funding – Current funding will require slowing and stoppage of the deployment activities estimated by the end of Q2 2024. Re-start, once full funding is provided, will be time-consuming and add additional cost to the program. Reimbursement Process described below will have a more immediate impact to the program. Approximately 50 to 60 % of the available funding has been spent, but because of the reimbursement process described below, this amount in the form of invoicing for reimbursement is not seen by the FCC yet. On top of the invoices stuck in the process there is another estimated 30 to 35% of work underway that will result invoicing, and thus submission for reimbursement that will take place in the next 90 days. With this full view the shutdown of the project within the next 90 days or shortly after is highly likely unless additional funding is secured. Cost of restarting will add additional costs to remobilize and schedule crews, potential contract re-negotiations with contractors, and the increase in costs due to inflation.

Without full funding for the program being appropriated by Congress, Viaero will be unable to finish the removal, replacement, and disposal process, which will leave approximately 60% of Viaero's network left with Covered Equipment. This equipment is no longer supported, and could result in issues that cannot be resolved should a site or card, or other component of the network go down, which will not only affect these rural customer's ability to continue to receive mobile and broadband services, but could also affect their ability to access critical functions such as dialing 911 or their ability to work, access their educational material online, participate in telehealth resources, etc. For many of Viaero's towers, Viaero continues to serve as the carrier of last resort.

Reimbursement Processes

- a. Suspension of Reimbursements during application amendments.

The challenges above have added burden, complexity and additional cost to reimbursement process that should be corrected as soon as possible.

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?

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*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?

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*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?

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*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	Michael Felicissimo	Certifier Phone	9705423605
Certifier Name	Michael Felicissimo	Certifier Email	mike.felicissimo@viaero.com
Certifier Title	President		
Date Signed	2024-01-08		