

SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002113

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.

2023-10-08

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.

Updates on activities completed and underway during the previous period are as follows:

- Gogo is continuing to work with our vendor selected to provide replacement network components and equipment
 - o At this point, Gogo has placed an order with their vendor for initial quantities of replacement network equipment
 - This limited quantity of equipment (11x total “cell sites”) will be installed in Gogo’s planned “Test Bed” site locations in the field, and in Gogo’s Chicago and Broomfield lab facilities
 - Lab equipment will be used for preliminary testing by Gogo’s Engineering teams, to gain a level of confidence that the systems are working as expected, with enough functionality proven to then begin testing at the field Test Bed locations
 - Test Bed cell sites will be the primary outlet for Gogo and our vendor to execute testing and verification activities
 - o Given Gogo’s unique use case, requiring that our current network remains fully operational for customer use, leading up to the point that we switch over to full utilization of replacement network equipment and systems, it is imperative that functionality is tested as completely as possible on these Test Bed sites
 - Gogo’s selected vendor has provided notification that they are having issues securing lab availability to complete FCC-required testing to certify that their replacement network equipment can operate within specific requirements – this testing and associated certification must be completed and obtained before the vendor can ship equipment to Gogo (including the Lab and Test Bed site equipment noted above)
 - At this time, quoted availability with Gogo’s selected vendor’s labs that have been used in the past for this type of testing and certification, is “early 2024”
 - To help expedite this timeline, Gogo has provided their vendor with contacts for labs for this type of activity and certification that Gogo has used in the past, for their own equipment – no updates are available currently on whether Gogo’s selected vendor has been able to secure availability with any of these labs
 - o Gogo is working with our vendor to split the originally outlined “Systems CDR” (Critical Design Review) milestone into three separate CDR milestones; this will enable Gogo to order replacement network equipment in phases, rather than all at the same time – this proposed, revised approach is as follows:
 - “Antenna CDR” – to focus on replacement network antenna equipment, to be installed on Gogo’s cell site towers
 - The “Antenna CDR” will focus on antenna hardware-specific test data and information provided from the selected vendor, to Gogo, to provide a level of confidence that Gogo can proceed to order replacement network antenna equipment, for eventual installation in the field
 - “Shelter Equipment CDR” – to focus on replacement network equipment to be installed inside the shelter buildings at Gogo’s network cell site locations
 - The “Shelter Equipment CDR” will focus on replacement rack/shelter equipment-specific test data and information provided from the selected vendor, to Gogo, to provide a level of confidence that Gogo can proceed to order replacement network equipment, for eventual installation in fielded cell site shelter locations
 - “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
 - The “Systems CDR” will focus on software-based capabilities and associated verification results provided from the selected vendor, to Gogo, to confirm that the entire end-to-end replacement network, air interface between the ground network and

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

As outlined last quarter, given that Gogo's particular application for network replacement includes parts and equipment that are not COTS (Commercial Off The Shelf), there continues to be significant effort and consideration involved to design and manufacture these items per specific requirements, as outlined above (both with our selected vendor and internally). Additional details on these efforts and associated challenges are included below:

- Gogo continues to see marginal improvement across the supply chain for Airborne Equipment materials availability and associated lead times for delivery; as was the case in our last update, constraints in this area should still be considered a key area of risk to consider for the program moving forward
- Given the update provided earlier in this report on progress made with our selected vendor, aspects/components of the intended replacement network (Cell Site Ground Network Infrastructure, Tower Antennas, etc.) have been ordered to support Lab and Test Bed site installation, once delivered
- Generally, Gogo has received feedback from the selected vendor on supply chain constraints and challenges, which should be noted:
 - o Gogo's selected vendor is receiving pushback from their manufacturer on the ability to support the manufacturing of the replacement network equipment allocated for 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)
 - o Gogo's selected vendor is also receiving feedback from their manufacturer on overall lead times associated with delivery replacement network equipment at scale; Gogo's original SOW (Statement of Work) with the vendor states a 26-week lead time for such equipment, however, current quoted times are now coming in at 35-40 weeks
 - o Gogo is actively evaluating this feedback, and determining next steps to ideally work with the vendor to mitigate these lead time constraints

* 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.

Currently, Gogo is:

- In the process of complying with all requirements of the Reimbursement Program
- In the process of complying with the commitments made originally in our application
- In the preliminary phase of the process of permanently removing, replacing, and disposing of all covered communications equipment or services that were in our network as of the date of the submission of Gogo's application
- In the process of complying with the timeline submitted in our application

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 good 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 their first program application amendment, to revise pricing associated with several components and services tied to network replacement efforts and activities
- Gogo continues to work with Summit Ridge Group to support with and assist the reimbursement process
- It is worth noting that 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 has completed implementation of both the network core and HSS (Home Subscriber Service) solutions with vendors originally selected; network core elements are installed in both of Gogo's datacenters in both Illinois and Colorado
- 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 targeted for completion by mid-December 2023

Gogo is continuing to monitor the review and approval timing for reimbursement requests that have been submitted; there is concern over the time experienced tied to the review and processing of requests that have been submitted thus far, specifically as it relates to spending outset and associated timely reimbursement

As outlined earlier in the report, Gogo has commenced preliminary activities pertaining to program execution; mainly in the areas of equipment sourcing/ordering, 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 Reimbursement Program. 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 Reimbursement 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	3033013200
Certifier Name	Crystal L. Gordon	Certifier Email	cgordon@gogoair.com
Certifier Title	Executive Vice President and C		
Date Signed	2023-10-06		