

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0001396

### Applicant Information

Applicant FRN 0030287973

Applicant Address 91 Commercial Street

Applicant Name Interoute US LLC

Applicant City Lynn

Applicant Email tony.hansel@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 Anthony Hansel

Contact Address 91 Commercial Street

Contact Email tony.hansel@exainfra.net

Contact City Lynn

Contact Phone 5712254845

Contact State MA

Contact ZIP Code 01905

\*Indicate which deadline you are meeting with this filing.

2023-01-11

## 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.

Interoute has been actively executing the project plan and schedule provided with its SCRIP application last year. In particular, the company has ordered the Ciena replacement 10G and 100G cards noted in the project plan. Interoute's vendor Ciena originally provided equipment delivery dates of May/June 2022, but due to supply chain issues, it pushed out the delivery dates by several months. Interoute has been receiving equipment piecemeal since June, with the final deliveries having arrived in November 2022 – after the submission of Interoute's last status report. Ciena said it continues to experience extended delivery lead-times of key components required for their manufacturing process, which has impacted their ability to deliver to customers as originally planned. The overall project plan schedule has been impacted by the delayed equipment deliveries, but Interoute has been progressing on any tasks possible using available equipment.

As of January 2023, almost all of the underlying base equipment has been converted to Ciena. Interoute has also pulled forward most of the plans to swap out the equipment supporting 10G cards. Because the 10G cards and related equipment became available sooner, Interoute began on that part of the replacement process rather than wait to complete the 100G migrations.

The supply chain issues have affected all of Interoute's operations and projects, and as noted above, the lack of equipment available prompted Interoute to reorganize some of its planned activities and priorities. Additionally, one of Interoute's existing engineers left the company in October 2022 which had a significant impact on the team and workload. Interoute had planned to hire 1-2 additional engineers to assist with the program, but this also has been delayed. A new engineer hire started on January 3, 2023, although it will take some time to get this new resource trained up to the required level of competency. An additional engineer is slated to start with the Interoute team on February 20, 2023.

Another factor that has impacted Interoute's schedule is rescheduling of necessary maintenance windows. Generally speaking, Interoute must provide customers with 10 days' notice before work that may be service-impacting can be performed, and nearly all maintenance work must be done outside of normal business hours so as not to interrupt customers' business. Scheduling maintenance windows has been complicated due to a number of factors, including: (a) customers not available or not agreeing to a particular proposed window/date; (b) equipment not behaving as expected when installed; (c) faulty equipment; and/or (d) dirty or bad optical fibers. Thus, many maintenance windows have been postponed/rescheduled. Maintenance windows are typically only for up to six (6) hours, and if the work is not complete within that timeframe, or if the work is unsuccessful, the window has to be postponed/rescheduled to another suitable date.

Interoute remains engaged with ATR (Advanced Technology Recycling, a DDTC registered company) to handle disposal of the removed covered equipment. The disposal has involved scrapping or destroying the equipment in such a way that it cannot be reused in another network. As noted in the October 2022 status report, the first two shipments of equipment were sent from Lynn (Cable Station) to ATR on July 12 and July 14, 2022.

In light of the foregoing, Interoute's timeline for completing the replacement of all covered equipment has been pushed out to November 2023.

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

Interoute has approved and has been using Ciena as the vendor of choice for its network in North America for several years, and it must stick with this vendor 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 vendors. Ciena generally has been able to supply the required replacement equipment, but as described above, deliveries of equipment to Interoute have been delayed several times due to supply chain issues. This has pushed out Interoute's overall schedule by several months. Interoute has now received all equipment that was ordered to support the SCRP removal project, although the company continues to experience extended lead-times for other equipment required for day-to-day business. Interoute is in regular contact with Ciena regarding the progress of the shipments and receives regular shipment tracker reports.

\* 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.

## 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, replaced, and disposed of (or is in the process of permanently removing, replacing, and disposing of) all covered communications equipment or services that were in the recipient's network as of the date of submission of the recipient's application requesting funding.

Yes  No

If you have not yet completed the removal, replacement, and/or disposal process, what estimated percentage of the removal, replacement, and/or disposal process have you completed?

\*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.

As described above, Interoute's projected timeline for replacing all covered equipment within its network has been pushed out to November 2023 due to supplier delays, employee attrition, and challenges with respect to time windows for maintenance and replacement.

## 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	Tony Hansel	Certifier Phone	5712254845
Certifier Name	Tony Hansel	Certifier Email	tony.hansel@exainfra.net
Certifier Title	Chief Legal Officer		
Date Signed	2023-01-11		