

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0001852

### Applicant Information

Applicant FRN 0001754209

Applicant Address 3984 County Rd 32

Applicant Name Pine Belt Cellular, Inc.

Applicant City Arlington

Applicant Email cores@pinebelt.net

Applicant State AL

Applicant Phone 3343855000

Applicant ZIP Code 36722

### 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 Sam Hariton

Contact Address 4031 University Dr., 2nd Floor

Contact Email sc.external.rfi.pinebelt@wideli

Contact City Fairfax

Contact Phone 7035601750

Contact State VA

Contact ZIP Code 22030

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

2023-07-10

## 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.

Yes, my company has conducted work on the removal of covered equipment since submittal of the last form. To date, we have removed ZTE RAN equipment at 20 of 67 sites. Removal of the remaining sites will depend on several factors, including assurances of sufficient reimbursement funds to cover costs of the mandated work. Included in the removal contingencies is the ZTE core which cannot be shutdown and removed until the last ZTE RAN is shutdown. No, my company has not conducted work on the disposal of covered equipment since the submittal of the last form. We have the removed equipment warehoused and are in the process of working out chain of custody details and selecting a disposal vendor. Yes, my company has conducted work on the replacement of covered equipment and services since the submittal of the last form. We continue to work to ensure the replacement core services are properly "tuned in". We have completed 13 RAN site replacements since the last report.

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

We are finding that some equipment and services are commercially available, and some are not. Specifically, we have delays in delivery of several core server components. We make do with what we have and wait until such time that the vendors are available to deliver.

\* 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.

Pine Belt understands and appreciates the need for accuracy and compliance within the context of the reimbursement program. But everything has a cost. The time spent on strict administrative compliance and waiting on replies to good faith remittances consumes resources that could otherwise be spent in pursuit of the program objective itself which Pine Belt understands is to eliminate certain vulnerabilities within the national security framework without pushing areas served back into the unserved category. Pine Belt fully supports the position that containment of the program cost is important. However, the heavy administrative burdens of the program, without question, are contributing to delays in project completion. Related, we would like to call out here that several program participants have previously made ex parte filings documenting their experiences in processing delays of reimbursement requests. As for Pine Belt's experience, on May 11, 2023, we submitted our initial Form 5640 modification to replace our cost catalogue average estimates with actual quotes. In our best effort to meet expectations, we spent a substantial amount of time internally and in consultation with all our vendors compiling the details of these quotes. In addition to the amount of time it took to compile this submission, this resulted in a rather voluminous filing. Nearly 7 weeks later, on June 27, 2023, we received our initial feedback requesting clarification on a number of line items. It is not known at this point whether additional requests for information will follow nor how long it will take to resolve the initial questions asked. The detailed scrutiny, whereas perhaps necessary from one angle, is highly inefficient from another and yet one more example of the uncertainties and costly difficulties that program participants are facing in meeting the national security mandate. The end result of all this can be described as a steep imbalance between the performance expectations placed on the network operators and the ability of those same operators to meet their commercial obligations to their vendors and customers. Coupled with the ever-present unknowns stemming from the funding shortfall in the hands of the U.S. Congress, a variety of issues are called into question, the most extreme being the fundamental ability to even stay in business, as well as the elevated potential that "rip and replace" becomes a failed federal program aimed to boost security at the cost of small businesses who have spent decades working to serve the unserved.

Timeline Deviation

## 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?

30

\*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?

30

\*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	John C. Nettles	Certifier Phone	3343855001
Certifier Name	John C. Nettles	Certifier Email	john@pinebelt.net
Certifier Title	President		
Date Signed	2023-07-07		