SCRPStatus Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0001440

Applicant Information

Applicant FRN 0019623834 Applicant Address PO Box 8826

Applicant Name SI Wireless, LLC Applicant City Columbia

Applicant Email leslie.williams@siwirelessllc.c Applicant State SC

Applicant Phone 8064441375 Applicant ZIP Code 29202

Contact Information

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Is the contact the same as the contact listed on the Application Request for Funding Allocation? If not, please list below.

Contact Name Leslie Williams Contact Address PO Box 8826

Contact Email leslie.williams@siwirelessllc.cc Contact City Columbia

Contact Phone 8064441375 Contact State SC

Contact ZIP Code 29202

2023-01-11

^{*}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.

SI Wireless ("SIW") has removed and destroyed all the Huawei equipment in its network.

The two major challenges in moving forward with replacing the network are (1) the lack of funding and (2) staff's refusal to discuss whether certain equipment and services will be reimbursed.

To date, SIW has spent over \$12 million on removal of equipment, but has been reimbursed less than \$375,000. Many invoices have been sitting in the system for over 130 days with no action. This delay in reimbursement has severely impeded the ability of SIW to continue the process. SIW's vendors need to be paid in a timely manner. The delay has caused its vendors to stop work, in turn, impeding SIW from completing the work.

One of the biggest challenges is the uncertainty of what costs will be reimbursed. Due to the inability to discuss with staff responsible for reviewing invoices, the only way for SIW to gain certainty before incurring significant expenses is to submit cost modifications in the Portal, and then wait months for a response, which typically consist of a large number of questions, thereby extending the process even further. If reviewing staff were authorized to discuss submissions in advance, SIW could accelerate the process of engaging vendors to continue work on removal, replacement, and disposal of covered equipment.

SIW has had discussions with vendors to deploy new equipment, but is unable to enter into contracts without assurances that the funding will materialize. Unlike some of the other applicants, SIW has been able to migrate its customer base to another network while the equipment is being replaced rather than build a new network and then migrate customers to it. SIW has been able to proceed at a much quicker pace as a result, but is now stuck because it has not been reimbursed for its efforts thus far. SIW suggests that at a minimum there be a "shot clock" of 30 days for each invoice submitted for reimbursement. If there are any issues with the invoice, an RFI should be issued so that expectations can be set and problems understood. SIW also would welcome the opportunity to walk staff through the network decommissioning and equipment destruction process and share evidence of the amount of work that SIW has completed thus far. SIW strongly believes such a meeting will go a long way to educating staff about these processes, allow for questions to be addressed and will help streamline the review process in a manner that will allow the funds to be disbursed in a more reasonable time frame so that work doesn't have to come to a complete halt.

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

While certain replacement equipment is commercially available, there is a lack of certain equipment that best suits SIW's needs. We have currently tested Tarana equipment and found it will do part but not all the job for us. This Equipment is backordered at least 4 months and certain parts like Harding connectors needed to deploy it are backordered longer. We are looking to do most of our deployment with Samsung equipment but are waiting for our in market test platform to be completed and have already experienced problems ranging from power supply availability to short shipments of mounting brackets. We have been able to overcome these on the small test scale but its imperative that we get our large order in now and its equally imperative that we be on the same page with the FCC when we do this and as described above there is not a way to discuss and resolve our interim plan with them right now in order to do this

* 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 discussed above, it is important that SIW be able to engage in a real-time dialogue with those responsible for reviewing its invoices and reports and cost modification requests. It would be helpful for the Commission to assign a single point of contact responsible for discussions with SIW.

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, 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 therecipient'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 discussed above, it is important that SIW be able to engage in a real-time dialogue with those responsible for reviewing its invoices and reports and cost modification requests. It would be helpful for the Commission to assign a single point of contact responsible for discussions with SIW.

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 mayresult in thedenial 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 Leslie Williams Certifier Phone 8064441375

Certifier Name Leslie Williams Certifier Email leslie.williams@siwirelessllc.cc

Certifier Title President

Date Signed 2023-01-11