

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002156

### 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



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.c

Contact City Columbia

Contact Phone 8064441375

Contact State SC

Contact ZIP Code 29202

\*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.

SI Wireless has experienced incredible delay in getting its network replaced mainly due to a lack of funding and funding approval. Since the last status update was submitted in July 2023, SI Wireless has received 31 payments amounting to less than 2% of our billings to date and received 136 Requests for Information (RFI) from the Fund Administrator. SI Wireless is still waiting to be reimbursed on invoice(s) originally submitted into the portal on October 17, 2022, which means as of this status update, this invoice is over 350 days old. This is an example of one of many invoices that are aging over 300 days. Invoices that have been approved have taken, on average, 170 days to be processed. We have six invoices in the portal that are in "Under Initial Review" status that have aged over 250 days.

The below example shows the invoice cycle for one invoice originally submitted on 10/17/2022:

10/17/2022 invoice submitted  
11/15/2022 received first RFI from EY (29 days waiting on Fund Administrator)  
11/15/2022 responded to first RFI  
05/19/2023 received second RFI from EY (185 days waiting on Fund Administrator)  
05/19/2023 responded to second RFI  
06/01/2023 received third RFI (13 days waiting on Fund Administrator)  
06/07/2023 responded to third RFI  
07/12/2023 received fourth RFI (35 days waiting on Fund Administrator)  
07/20/2023 responded to fourth RFI  
07/31/2023 received fifth RFI (11 days waiting on Fund Administrator)  
08/06/2023 responded to fifth RFI  
08/10/2023 received sixth RFI (4 days waiting on Fund Administrator)  
08/23/2023 responded to sixth RFI  
09/06/2023 received seventh RFI (14 days waiting on Fund Administrator)  
09/06/2023 responded to seventh RFI (28+ days still waiting on Fund Administrator)  
Currently this invoice is still under review, with a total of 319 days of Fund Administrator processing.

It seems the invoice approval format has changed as well. SI Wireless has come to this conclusion given that monthly management invoices, with the exact same format that were previously getting approved, are now receiving RFIs compared to previous months' invoices that did not receive RFIs. Since the last status update, SI Wireless has also noticed a change in Fixed Fee Billing approvals. SI Wireless has engineering contractors who bill on a fixed fee basis, which per the FCC's FAQs is permitted as long as the services are "[s]pecific engineering professional services that result in work products or deliverables (e.g., system design, vendor selection, technical bid support and subcontractor retention and management)...[f]or professional services billed as fixed fee, the Participant must submit a copy of the vendor invoice and quote that provides a cost and activity 'build-up' to support the expense. Fixed fee invoices must specify the time period covered by the invoice, a description of the services rendered, and the amount due." SI Wireless's engineering contractors' deliverables fall within the described permitted activities in the FAQs. However, SI Wireless has received numerous RFIs from the Fund Administrator concerning such fixed fee invoices which is causing inordinate delay of receiving funds hindering SI Wireless from completing its work.

The end result is countless hours of administrative work that are driving up the costs of the program unnecessarily. Until the last week, SI Wireless has made numerous attempts to discuss its concerns with the Fund Administrator to reach a solution but has received extremely delayed responses from the Fund Administrator in trying to

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

Lead time for some equipment is still sitting at 4-6 months. It becomes especially challenging when you combine this with lengthy delays getting funding from the Fund Administrator,

\* 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.

SI Wireless has had difficulty purchasing the needed 4G equipment for its network replacement due to cash flow issues that have stemmed from excessive delays in processing invoices. As each day passes, the 4G equipment that SI Wireless needs to purchase becomes harder to obtain because the equipment vendor is producing more 5G equipment and less if any 4G LTE equipment. The delays associated with the Fund Administrator's processing of invoices and the overall funding short fall of the program is causing concern that by the time SI Wireless gets its invoices approved and paid the equipment might not be available and it will be back to the drawing board to get new equipment approved and then get in line to get funding to place an order then actually have the equipment scheduled and delivered. There is a very clear problem with specifying 4G equipment and then not fully funding the program and/or allowing the 4G equipment to be purchased now when it is available.

The concept of having SI Wireless rebuild its network with 40 cents on the dollar is not feasible to start but coupling that with the lack of timely payments we have experienced means we are spending all our time dealing with that issue and not with the needed deployment. Please understand that with the funding shortfall there is in essence a 60% holdback in this program when 10% is normal and allow the reimbursements and payments to flow to in our case at least redeploy to a sustainable level. Given its current limited ability to access the funds approved for allocation, coupled with the excessive invoice processing delays, SI Wireless is behind on its one-year timeline and will be seeking an extension to complete the process.

## 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?

\*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?

\*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	LESLIE WILLIAMS	Certifier Phone	8064441375
Certifier Name	LESLIE WILLIAMS	Certifier Email	leslie.williams@siwirelessllc.cc
Certifier Title	PRESIDENT		
Date Signed	2023-10-08		