

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002597

### 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.

2024-04-08

## 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.

We have several challenges to completing this project. There is the three prong problems of government short funding, non-payment of currently allocated amounts, and oppressive requests for information. Even in the face of this, SIW, with the extensive support of and credit extended by our primarily small company vendors who really don't have the ability to do this, has made a substantial amount of progress. We have commenced installation work on all but 25% of the core sites we have identified as being critical to launching a sustainable fixed wireless product offering. Please note that the 15 Tennessee counties in our initial deployment have been largely overbuilt by rural electric companies newly in the internet business with heavily lobbied for government funded fiber deployments done at a huge cost. Without a company like SI Wireless there will be no competition in these markets for sanctioned monopolies that have now been given another monopoly product (internet access) and the money to pay for it. Without competition the relatively poor people in these areas will continue to be charged over 250% of what we will charge. SI Wireless' participation in the SCRP program will enable us to help mitigate the huge holes in the wireless services that these people would otherwise experience.

It is for this and many more reasons that SI Wireless implores the FCC and the SCRP program to timely fund the already allocated funds so that we can begin serving some of these users so that we can be sustainable and have a reasonable shot at providing excellent service and competition in this market while we are waiting for the rest of the funds awarded to replace our network to be funded by congress. This is the time to help not hinder. Since before receiving our allocation on 07/15/2022 we have been working diligently to Rip and Replace our network and we had a workable plan to have the entire project completed within a one year time frame. We have had 215 days of zero invoice processing due to 2 modifications (one taking 155 days and the other taking 60 days) due to the fact that modifications shut down all invoice processing until January 2024 when the decision was made to change this rule. We have responded to over 300 RFIs on just over 300 invoices only to find out that the Plan Administrator has been holding onto a significant number of invoices without requesting any additional information and not paying without any communication as to why. This delay in reimbursements significantly disrupted our workable one-year schedule. Without timely processing of invoices there is the probability that you will put a small company like ours out of business. We have a tremendous opportunity to actually do what needs to be done in order to secure quality affordable and innovative service to people at a fraction of what the misguided current monopoly funded programs will never do will.

We are severely and adversely affected significantly more by all this delay than other companies in the program that have ongoing revenue streams. Instead of making us wait so much longer because we are different you should please acknowledge our different circumstances and needs and help us to receive the funds currently allocated for the work that is being completed according to program guidelines so that we can have our network up and running at the earliest and begin providing service to the underserved population of Tennessee. The lack of reimbursement is inflicting tangible harm not only to our company but also to the communities we are trying to serve.

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

We are still experiencing lead times of up to 6 months on equipment

\* 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.

We are asking the following:

1) Please pay us promptly so we can reimburse our vendors and complete and put into operation a network that will let us sustain ourselves. Just this week we were informed that over 172 invoices had been and continue to be held up for periods in excess of 300 days That is not normal and certainly not best accounting practices.

2) Understand all participants in the program are not the same and do so in a way to help facilitate its completion not to oppress those who are different. We realize most participants in this program have ongoing revenue streams (mostly USF funded) and continue to operate their networks throughout this transition. In that case rent for instance is an operating expense already being offset by revenue and not a reimbursable expense of the program. We are not that case, we don't receive any USF funding, we have no offsetting revenue during this project, we shut our network down to remove the unsafe Chinese equipment and are redeploying our network and therefore any rent we pay is part of that effort should be considered a program expense and thus be reimbursable. Instead of that we are getting held up in some cases for over a year on getting paid for reimbursable expenses we are due as previously approved expenses. We don't want or need USF money and endless delays, we just want to get reimbursed, get our product out there, and put forth our best effort in the marketplace.

3) Have someone actually reach out and talk with us to understand what we need to get this done. We need to at least get into a holding pattern waiting for congress with a replacement network up and running. Please work with us, where there is continuity of whomever is on our team. It's just faceless figures communicating through RFIs that are serial in nature, largely mischaracterizing of what we communicate, and trying to make our deployment fit a set of questions that we imagine are being passed around at Monday meetings. We would be happy if someone from the program could actually do a site visit and try and understand the work behind the paperwork and work with us instead of against us as it has often felt throughout this program.

## 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.

Not ALL covered equipment has been replaced.

## 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         | 2024-04-08      |                 |                                  |