

SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002362

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.

2024-01-06

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 once again finds itself in a prolonged waiting period for the fund administrator to approve its modification, submitted on November 17th, 2023. As a consequence, all invoice processing has been halted since that date, given that any modification results in the suspension of all invoice processing. To put this into perspective, a total of 209 days and counting have been spent waiting for the fund administrator to approve SI Wireless Modifications, keeping in mind that the initial timeframe for this program is 365 days. Please note this modification delay is separate from the invoice processing delays that have invoices waiting over a year for approval. The issue of waiting for the fund administrator's approval is not a new challenge for SI Wireless. Currently, there are over 200 invoices awaiting approval, and even more disconcerting is the fact that over 100 invoices are in queue, still in a submitted status, meaning they have not been looked at by the fund administrator yet (the oldest one is 188 days old). These invoices are lingering, awaiting attention. This situation has led to extraordinarily long wait times for invoice approval, with one invoice taking nearly a year to get approved. The specific invoice in question underwent a 352-day approval process, during which 319 days were spent waiting for the fund administrator to issue 7 Requests for Information (RFIs). The crux of the matter was fixed fee billing, a method explicitly deemed acceptable for professional engineering services according to the FAQ, yet the fund administrator refused to acknowledge it as such. This refusal resulted in an increase of almost \$300 to the invoice when converted to Time and Materials (T&M). Moreover, the extensive back-and-forth during the RFIs, each billed at \$175+ per hour, not only incurred substantial costs but also consumed countless hours. In the pursuit of preventing waste, fraud, and abuse, Ernst & Young inadvertently escalated spending for this invoice by a substantial amount for SI Wireless with their RFIs and associated work. This calculation does not even account for the number of hours billed by Ernst & Young to "process" the invoice and submit RFIs. Adding to the frustration, multiple invoices received identical RFIs more than once, indicating a lack of consistency in the approval process and posing a significant challenge to operational efficiency. In their report to Congress on January 5th, the FCC indicated that the fund administrator received a total of 12,983 reimbursement claims. The question arises: How many of these invoices experienced a significant increase due to unnecessary back-and-forth discussions? The reimbursement structure for Ernst & Young's services as the fund administrator remains unclear, but it appears that the current practices may inadvertently generate additional work, leading to unnecessary delays and potentially inflated billables for the benefit of Ernst & Young, the Fund Administrator. The frequency with which these issues are occurring suggests that this is not an isolated incident but rather a recurring pattern. The delay in reimbursement is not only impeding the timely completion of the project but is also creating an environment where waiting for an entire year to have an invoice reimbursed is deemed acceptable. This mindset and program approach of delay is unsustainable and seriously jeopardizes successful achievement of program goals as well as the viability of program participants. The Fund Administrator's actions, which lead to an inflation of work for one invoice by a significant amount, should be unacceptable. Waiting 319 days for the Fund Administrator to produce 7 questions (RFIs) on an invoice should be unacceptable. The fact that these challenges are pervasive across most of our invoices, not just one, should be unacceptable. The waste the Fund Administrator is generating on nearly every invoice we submit should be unacceptable.

*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.

Furthermore, the lack of a limit on the amount of time the Fund Administrator can sit on an invoice should be unacceptable. SI's position is that the Fund Administrator be directed to correct each of its unacceptable actions and administer the program timely and efficiently to ensure its success and that of participant vendors. There is a pressing need to question who is ensuring that the Fund Administrator is not creating waste, fraud, and abuse. SI Wireless currently has open invoices submitted in 2022, 446 days ago, still sitting in under initial review, which should be deemed unacceptable. The Fund Administrator's failure to approve invoices in a timely manner may force SI Wireless into bankruptcy and to cease operations. As this outcome likewise should be deemed unacceptable, it is in the best interest of program success to correct and improve the Fund Administrator's performance as soon as possible. While acknowledging that funding shortages and supply chain issues are challenges, the predominant blame for the program's poor performance lies with the Fund Administrator.

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	2024-01-08		