

## SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0002721

### Applicant Information

Applicant FRN	0001768159	Applicant Address	111 High St
Applicant Name	Advantage Cellular Systems,	Applicant City	Alexandria
Applicant Email	ctownson@staff-dtc.com	Applicant State	TN
Applicant Phone	6154642303	Applicant ZIP Code	37012

### 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	Chris Townson	Contact Address	111 High St
Contact Email	ctownson@staff-dtc.com	Contact City	Alexandria
Contact Phone	6154642303	Contact State	TN
		Contact ZIP Code	37012

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

2024-07-08

## 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.

Advantage Cellular Systems, Inc. (ACS or The Company) continues efforts to permanently remove, replace, and dispose of covered communications equipment and service. ACS has undertaken the following steps to move the project forward and meet the program's requirements.

- 1) ACS continues to develop, adjust, and execute plans for the completion of the project. We are still experiencing challenges regarding lack of full funding for the program, lack of workforce availability, and supply chain delays. The unknown timing and lack of guidance related to these challenges has forced ACS to continue to expend significant time in adjusting and evaluating operational and engineering plans with potential vendors, financiers, and workforce crews.
- 2) ACS has worked with and continues to work with consulting engineers and crews to evaluate and undertake site visits, procure warehousing space, coordinate equipment removal plans with tower company representatives, and coordinate the ordering and delivering of new equipment pending full funding being allocated to the program. Without full funding, ACS will be unable to complete these processes.
- 3) ACS has removed covered equipment from 28 sites. The ZTE Core equipment and supporting software have been removed. Our network is operational utilizing temporary core functionality, which will be permanently replaced, pending full funding.
- 4) ACS has also experienced significant delays in processing its reimbursement claim requests, but the FCC or its vendor's process seems to have improved recently.
- 5) ACS filed for and has received a 6-month extension from the FCC to complete the project.

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

ACS recently received replacement RRUs/BBUs, servers and other parts needed at towers and in central offices. Each is required to keep the spectrum working and customers served upon removal of the final ZTE 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.

ACS continues working to comply with the timeline submitted and has received a 6-month extension from the FCC to complete the project. However, lack of delivery of certain equipment, lack of full funding, and available workforce from vendors continue to slow the project. We are doing all we can to meet the deadline. The issues for timely delivery that we face are the filters for Band 17, Lower C. Any delay in the delivery or lack of workforce availability for the project would push us past ACS's new deadline to replace equipment under the 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?

90

\*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?

65

\*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?

85

\*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.

ACS is in the process of complying with all the Reimbursement Program's requirements, but administrative and supply chain delays associated with the program are significantly hampering ACS's efforts. The unknown timing and lack of guidance on fully funding the Reimbursement Program, lack of workforce availability, and supply chain delays have all significantly slowed ACS's efforts. As indicated on ACS's proposed timeline, each challenge has significantly slowed expected progress.

ACS is in the process of removing all its covered communications equipment and services, as stated in its application. As stated earlier, ACS has removed covered equipment from 28 sites, removed the ZTE core and related software, and is working to replace equipment on specific sites. However, ACS's efforts will continue to be hampered until it is fully funded, supply chain issues are resolved, and workforce availability meets demand.

ACS has completed approximately 90% of the total project. As stated, delays have been caused by various issues that are completely out of ACS's control. While no portion of the project is complete, ACS would estimate that, as stated in the timeline, RFPs and planning activities are 99% complete, the Core activity is 65% complete, the RAN activity is less than 85% complete, and destruction activity is 85% complete. Still, to be clear, until full funding for the program is obtained, the company will likely be unable to fully complete a significant portion of the program.

We continue to state that without full funding for the program, it will be impossible for ACS to permanently remove all covered equipment and services and replace it with trusted and secure equipment during the program's required timeline without operational and financial harm. To further illustrate the importance of the timeliness of the full funding of the program, ACS is not in a position to expend significant funds or even procure loan funds for the completion of the program, not knowing that the funding will ultimately be made available for the completion of the project. This specifically applies to replacing the covered equipment with secure, reliable, noncovered equipment and solutions. ACS cannot replace its core until further funding is approved and allocated.

Inflationary impacts on the program's requirements are also significant. In addition to the challenges caused by unknown timing of full funding, workforce availability, and supply chain delays, increasing costs for each program element causes ACS to scrutinize further every decision to ensure the company can operate without operational or financial harm and its customers are served without interrupted or degraded service. The number one factor hampering the completion of this process is the lack of confirmed full funding for the entire project.

## 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	Chris Townson	Certifier Phone	6154642303
Certifier Name	Chris Townson	Certifier Email	ctownson@staff-dtc.com
Certifier Title	CEO		
Date Signed	2024-07-01		