

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Protecting Against National Security Threats to the)
Communications Supply Chain Through FCC) WC Docket No. 18-89
Programs)

**MOTION FOR EXTENSION OF TIME OF THE RURAL WIRELESS ASSOCIATION,
INC. AND NTCA – THE RURAL BROADBAND ASSOCIATION**

The Rural Wireless Association, Inc. (“RWA”) and NTCA – The Rural Broadband Association (“NTCA”) (collectively, the “Associations”), pursuant to Section 1.46 of the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”) hereby request an extension of the filing deadline for FCC Form 5640 related to the Secure and Trusted Communications Networks Reimbursement Program (SCRIP). Many of the Associations’ members, both carriers and vendors, have concluded that the current filing deadline of January 14, 2022 at 11:59 p.m. EST does not provide enough time to sufficiently complete gathering and uploading the data required by the FCC Form 5640. Accordingly, the Associations request that the SCRIP filing deadline be extended to February 14, 2022.

Collecting the necessary cell site data, filling out the numerous entries in the location, equipment, and cost estimate excel sheets,¹ and attaching necessary documentation² is a massive

¹ A typo in the Final Catalog of Eligible Expense and Estimated Costs, which overestimates the cost of an end-user truck roll, was recently found. The typo will further delay applicants’ ability to timely complete their applications as they will be forced to re-download a corrected cost estimate template from the portal and thus redo work they have already completed on the original cost estimate template.

² Attaching photos of the equipment being replaced in support of the estimates as individual attachments as opposed to being able to batch load photographs is particularly time consuming.

undertaking that requires substantial work for the impacted carriers, and their equipment and service vendors, as well as the consultants that have been retained for this specialty work. Many of the Associations' members will have to dedicate on average 8-10 labor hours per location to complete their Form 5640 and are finding themselves without sufficient time to submit their applications prior to the current deadline. Small rural providers' limited financial and workforce resources also exacerbate this issue, as does diminished workforce availability during the upcoming holiday season.³ Compounding matters is the quickly spreading COVID-19 Omicron variant that is sweeping through the United States and requiring quarantines for those who test positive taking them temporarily out of the workforce with the approaching deadline. The Associations have also received numerous inquiries from their members regarding lack of clarity in answering certain questions posed to FCC staff. The Associations note that no one has undertaken this type of work before and the applicants, vendors, consultants and FCC staff are doing their best to understand how to complete the application and meet the deadline. Ongoing questions and issues are arising as the applicants work through the process that require them to seek continuing clarification from the FCC on how to input and upload data. Both the applicants and FCC staff are facing a frustrating learning curve that has resulted in a need for additional time.

An extension of the SCRP filing deadline would serve the public interest by allowing small carriers sufficient time to apply for SCRP reimbursement funds, which are providing the financial vehicle for a transition to more secure U.S. communications networks. If such small carriers do not have sufficient time to apply for these funds, the transition to secure network equipment will be delayed, completely undermining the purpose of the SCRP. It would be

³ Given the federal government guidance deterring travel during the 2020 holiday season, this is the first holiday season in two years that many Americans have felt safe travelling, and therefore taking vacation leave.

shortsighted to hold rigidly to the existing application deadline, at the expense of longer term delay due to inaccurate applications. The Commission, applicants, and the public will ultimately be better served by a process that better ensures the initial submission of accurate applications, which will result in the most accurate funding allocation.

This extension will not negatively impact the transition process timing nor disadvantage other applicants to the SCRP. The timeline for receipt of reimbursements has already been set and is dependent on the timing of funding allocation. Accordingly, a brief extension of the application deadline will not delay receipt of reimbursement.

For the reasons set forth herein, the Associations respectfully request that is in the public interest for the SCRP filing deadline be extended to February 14, 2022.

Respectfully submitted,



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