

December 4, 2023

via ECFS

Ms. Marlene H. Dortch Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**RE: NOTICE OF EX PARTE**  
**WC Docket No. 18-89** – Protecting Against National Security Threats to the  
Communications Supply Chain Through FCC Programs

Dear Ms. Dortch:

On November 30, 2023, Carri Bennet, General Counsel, Rural Wireless Association, Inc. (“RWA”), Stephen Sharbaugh, Legislative Counsel, RWA, Jill Canfield, General Counsel and VP of Policy for NTCA – The Rural Broadband Association and the NTCA and RWA members listed under Appendix A met with representatives of the FCC’s Wireline Competition Bureau, copied below, to discuss the FCC’s Secure and Trusted Communications Networks Reimbursement Program (“Reimbursement Program”) and the difficulties and delays RWA members have experienced with the Reimbursement Program.

RWA and NTCA reiterated their members’ concerns with the slow processing of invoices, providing specific examples of processing delays. RWA has provided an example of one invoice lifecycle from one of its members in Appendix B to further illustrate the extreme delays. RWA and NTCA discussed how the locking of the entire application when a modification request is filed has significantly delayed program participants’ ability to efficiently complete the replacement, removal, and disposal process and timely pay their respective vendors. RWA and NTCA also noted that when the Fund Administrator issues Requests for Information (“RFIs”) for very small discrepancies in dollar amounts (less than \$1), it is creating hundreds, if not thousands of dollars in costs for the program participants who must then consult with their respective vendors, consultants and/or attorneys to respond appropriately. These costs, which are all reimbursable under the Reimbursement Program, cause delay and drive-up costs. The amount of back and forth and delay in correcting small rounding discrepancies wastes time and resources of both the participants and the Fund Administrator.

RWA and NTCA sought clarification from the Commission on whether loan interest is reimbursable under the Reimbursement Program, even if the loan is made after the program participant received its initial allocation. The Fund Administrator has taken the view that such loan interest is not reimbursable. RWA and NTCA argued that such loan interest should be reimbursable given that the significant delays in processing invoices has forced some program participants to apply for loans to sustain their businesses in the interim while they wait for payment on their invoices.

In discussing solutions, RWA and NTCA suggested that the Fund Administrator assign its staff to specific program participants so that the Fund Administrator staff are more familiar with the program participant they are working with, which should limit the amount of RFIs issued over a lack of understanding of the program participant's network.

RWA and NTCA also suggested that for invoice discrepancies \$100 or under that the Fund Administrator simply err on the side of the FCC and reimburse the lower amount. RWA and NTCA also suggested that the FCC find a way for the Fund Administrator to continue processing those invoices not impacted by a modification rather than hitting the pause button while a modification is pending.

This letter is being filed electronically in the above-referenced docket pursuant to Section 1.1206 of the Commission's rules. Please contact me if you have any questions or need anything in connection with this matter.

Respectfully submitted,

*/s/ Carri Bennet*

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cc: Callie Coker, Legal Advisor, Wireline Competition Bureau  
Ty Covey, Attorney, Wireline Competition Bureau  
Brian Cruikshank, Attorney Advisor, Wireline Competition Bureau

## Appendix A

John Nettles, Pine Belt Cellular, Inc.

Jana Wallace, Panhandle Telecommunication Systems Inc.

Brian Hough, Panhandle Telecommunication Systems Inc.

Eric Smith, Northern Michigan University

Matt Franti, Northern Michigan University

Amit Patel, Nokia

Mimi Strobel, Nokia

Leslie Williams, SI Wireless

Mignon Clyburn, MLC Strategies

Ron Jones, MLC Strategies

## Appendix B

### Timeline for Processing an Invoice

- **October 17, 2022:** Invoice submitted.
- **November 15, 2022:** Received first RFI from Fund Administrator concerning submitted invoice.
- **November 15, 2022:** Responded to first RFI.
- **May 19, 2023:** Received second RFI from Fund Administrator concerning the same invoice.
- **May 19, 2023:** Responded to second RFI.
- **June 1, 2023:** Received third RFI from Fund Administrator concerning the same invoice.
- **June 7, 2023:** Responded to third RFI.
- **July 12, 2023:** Received fourth RFI from Fund Administrator concerning the same invoice.
- **July 20, 2023:** Responded to fourth RFI.
- **July 31, 2023:** Received fifth RFI from Fund Administrator concerning the same invoice.
- **August 6, 2023:** Responded to fifth RFI.
- **August 10, 2023:** Received sixth RFI from Fund Administrator concerning the same invoice.
- **August 23, 2023:** Responded to sixth RFI.
- **September 6, 2023:** Received seventh RFI from Fund Administrator concerning the same invoice.
- **September 6, 2023:** Responded to seventh RFI.
- **October 4, 2023:** Invoice approved.