

SCRPS Status Update

FCC Form 5640

OMB Control No. 3060-1270

File No. SC-SU0003018

Applicant Information

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Applicant Name	Board of Trustees, Northern Michigan University	Applicant City	Marquette
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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	Sam Hariton	Contact Address	4031 University Dr., 2nd Floor
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Contact Phone	703-239-3299	Contact State	VA
		Contact ZIP Code	22030

*Indicate which deadline you are meeting with this filing.

2025-01-03

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.

NMU has removed Huawei equipment from 26 sites and continues removing covered customer premise equipment (CPE) devices ahead of the replacement of transmitter site equipment. The University has also placed equipment at six (6) additional sites but cannot remove Huawei equipment at those locations until technical concerns related to NMU's conversion from FDD to TDD transmissions can be addressed.

NMU has completed and received certification for its disposal work on 20 sites. Additional equipment removed from service is stored in a secure facility awaiting final disposal and certification.

NMU has completed the installation of equipment at 31 sites and continues to replace covered CPE devices on a regular basis.

Additionally, the University continues its regulatory, engineering, and bid work to complete multiple tower replacement projects in preparation for replacing covered equipment at the remaining sites.

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

We are finding that some equipment and services are commercially available, and some are not. We continue to experience delays with obtaining CPE devices that are ready to deploy. These CPE-related delays are delaying progress at several sites that are transitioning from FDD to TDD as the CPEs need to be replaced before we can remove and replace the RAN 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.

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?

41

*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?

55

*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?

30

*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.

Timeline Deviation: The lack of full program funding continues to prevent NMU from meeting its project timeline, as the University does not have the resources to purchase equipment and schedule removal, replacement, and disposal services at all of its sites. The partial funding allocated by the SCRP has caused NMU to establish a site replacement priority schedule, placing many sites on hold until full funding is approved. This phased project funding has led to delays in the timeline and will likely result in higher costs due to inflation and project management re-mobilization requirements should there be a lapse in construction activities.

Also contributing to replacement delays is the quantity of new towers and structural support modifications required for new equipment installation. NMU's unique geography and climate extremes, combined with the use of aging municipal water tanks and publicly owned elevated structures, resulted in a higher-than-expected number of failed structural analyses. To address this, NMU contracted with a local vendor familiar with wind and weather conditions unique to NMU's geographic service area to re-run those sites that had previously failed. This decision to reperform structural analyses while extending the replacement timeline did, however, result in the reclassification of ten facilities from "tower replacement" to "tower modification," providing a replacement path where none previously existed.

The timeline for new tower construction and existing facility modifications has been delayed by local climate, technical considerations, vendor availability, and the need for third-party involvement at sites not owned by NMU. However, due to harsh winter climate limitations in Michigan's Upper Peninsula, construction cannot begin until after the current RRD term deadline. The Upper Peninsula's unpredictable weather prevents establishing a precise replacement timeline as construction considerations - such as frozen ground, sub-zero temperatures, and vehicle road restrictions - restrict construction activities from November until April.

NMU has also experienced delays performing CPE swaps required by its switch from FDD to TDD due to device firmware issues and vendor supply chain delays. The University has been working closely with its vendor to resolve the concerns. CPE equipment swaps are required before selected tower site hardware changes can be made, adding to the time needed to complete this project. These issues related to CPE devices have prevented us from swapping the CPE devices on the network as quickly as we anticipated.

Due to these concerns, NMU anticipates that additional extensions will be required in order to complete the project as proposed.

NMU remains concerned that the lack of full SCRP funding will increase equipment and service prices for sites not yet scheduled for replacement. Without approval of full SCRP funding, it is likely that we will have to pause project-related activities in the upcoming months. Vendors have communicated to NMU that pausing its project activities due to the lack of full funding will likely result in personnel changes as they scale project activities to match the sites available for replacement. The remobilization of engineering, planning, and construction teams will add further delays to the project should replacements resume at a later date. In addition to increasing the overall project cost, this unanticipated replacement pause will make it difficult, if not impossible, for NMU to provide uninterrupted service to its existing customers, which could lead to approximately 2,000 customers losing broadband access across Michigan's Upper Peninsula.

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	Gavin Leach	Certifier Phone	906-227-2200
Certifier Name	Gavin Leach	Certifier Email	gleach@nmu.edu
Certifier Title	V.P. for Finance & Administratic		
Date Signed	2024-12-16		