

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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

**COMMENTS OF ERICSSON**

Ericsson submits these comments in response to the Wireline Competition Bureau’s Public Notice (“*Notice*”) inviting comment on the Supply Chain Reimbursement Program Study and the preliminary Catalog of Eligible Expenses and Estimated Costs (“*Catalog*”).<sup>1</sup> As a trusted supplier of broadband networks in the U.S. and abroad, Ericsson welcomes the opportunity to offer its insights on the *Catalog*.

**I. INTRODUCTION**

From the outset, Ericsson commends the Commission, Bureau staff, and Widelity for advancing the process for reimbursing the costs incurred by operators for the removal, replacement, and disposal of covered communications equipment and services. Much has been accomplished in a very short period. We have been encouraged by the professionalism and transparency under which the process has taken shape thus far. However, much remains to be done.

---

<sup>1</sup> *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, WC Docket No. 18-89, Wireline Competition Bureau Seeks Comment on a Report and Preliminary Cost Catalog and Replacement List to Help Providers Participate in the Supply Chain Reimbursement Program, DA 21-355 (Mar. 25, 2021).

Our customers with covered equipment are eager to begin the process of removal and replacement and are looking to the Commission to complete the remaining steps in standing up the administrative infrastructure as quickly as possible. The task of removing and replacing covered equipment is incredibly complex, involving dozens of distinct elements as noted in the Catalog.<sup>2</sup> For our part, we have made every effort to keep our comments to a minimum, in the interest of moving the Catalog to a place where it can be finalized.

Beyond finalizing the catalog, the Commission should move quickly to select a program administrator. The Commission will also have to secure Paperwork Reduction Act approval for the forms that will need to be completed by applicants, and that too will take some time. Finally, consistent with the *Third Further Notice of Proposed Rulemaking*<sup>3</sup> in this proceeding, there are some rules that need revision before the reimbursement process can finally be put in place. Operators need this certainty before they can begin their work. While we are hopeful that the process will proceed apace, there could be individual requests for waivers to extend deployment deadlines. Again, we ask the Commission to move quickly to address these items and get to a place where funding decisions and reimbursements can begin to flow smoothly.

## II. M2M/IoT SOFTWARE LICENSES

The current Catalog only includes Internet of Things (“IoT”) software licenses associated with core network nodes.<sup>4</sup> However, this does not reflect the need to replace existing Machine-

---

<sup>2</sup> See Catalog at pp. 8-9.

<sup>3</sup> *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, WC Docket No. 18-89, Third Further Notice of Proposed Rulemaking, FCC 21-26 (Feb. 22, 2021).

<sup>4</sup> See Catalog at p. 20.

to-Machine (“M2M”) and IoT software licenses in the Radio Access Networks (“RAN”) nodes as well. The Catalog should reflect these licenses exist (and thus need to be replaced) in the core *and* the RAN.

We therefore ask the Bureau to expand the current Catalog to include specific RAN software licenses for existing functionality, such as M2M, Cat-M1, Narrowband IoT, and similar items. This would ensure the continuation of IoT capabilities in one frequency band in all sectors of an existing LTE site with typical 2, 4, and 8-port radios.

Including RAN software licenses is clearly within the scope of the removal and replacement process, and we ask the Bureau to work with Widelity to clarify that these licenses should be addressed in the Catalog. Ericsson is ready today to provide this information to Widelity for a future, and we hope final, version of the Catalog.

### **III. CONCLUSION**

Ericsson appreciates the sheer depth and breadth of the task of removing and replacing untrusted equipment on a very tight time scale. In particular we commend the Bureau’s staff and Widelity for their diligence to date. We ask the Commission to maintain, and even accelerate, the momentum to complete the job.

Respectfully submitted,

*/s/ Jared M. Carlson*

Jared M. Carlson, Vice President  
Government Affairs and Public Policy  
Ericsson  
1776 I St., NW  
Suite 240  
Washington, D.C. 20006  
(202) 824-0112

April 26, 2021