



December 2, 2020

VIA ECFS

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

Re: Notice of *Ex Parte* Presentation-W.C. Docket No. 18-89

Dear Ms. Dortch:

On November 30 and December 1, 2020, the Secure Networks Coalition (SNC/Coalition);¹ met with Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel, and Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Pai. The meeting's purpose was to discuss the forthcoming Report & Order implementing the Secure and Trusted Communications Networks Act of 2019 (Secure Networks Act/Act),² and its associated program at the Federal Communications Commission (FCC/Commission).

During the meeting, SNC representatives shared their experiences in designing, building, and transitioning wireless networks and rebanding spectrum relevant to those activities envisioned in this program. The SNC's decades of experience building wireless communications networks and transitioning to new vendors, equipment, and technologies provides our Coalition with a unique perspective regarding the complexity of such a wide-ranging and vital program that requires an efficient and effective transition from telecommunications equipment and software that presents a risk to national security.

¹ The Secure Networks Coalition (SNC/Coalition) includes three companies represented at the meeting, Tasman Technologies, Scott Schelle; Televate, Rick Burke; and Monetti and Associates, Gary Monetti and Michael McMenamin. The companies have come together to provide Reply Comments in the Commission's *Protecting Against National Security Threats to the Communications Supply Chain* rulemaking and related proceedings. See, *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, 85 Fed. Reg. 4834, (August 10, 2020). The Public Safety and Homeland Security Bureau previously sought comment on the Secure Networks Act's effect on the initial designation proceedings of Huawei and ZTE. See *Public Safety and Homeland Security Bureau Seeks Comment on Applicability of Secure and Trusted Communications Networks Act of 2019 to Initial Designation Proceedings of Huawei and ZTE*, PS Dockets 19-351, 19-352, Public Notice, DA 20-267 (PSHSB March 13, 2020); See also, *Wireline Competition Bureau and Office of Economics and Analytics Open Reporting Portal for Supply Chain Security Information Collection, Requires Eligible Telecommunications Carriers to Report Existing Huawei and ZTE Equipment and Services and Replacement Costs*, W.C. Docket 18-89, DA 20-166, (February 26, 2020).

² Pub. L. 116-124, 133 Stat. 158 (2020) (Secure Networks Act).

The Coalition provided information on the background of the group's formation, which arose from discussions between our team with affected carriers and the industry associations representing them over the past year. From these discussions, we recognized that the affected carriers (and certain government agencies) could benefit from our experience..

We are a neutral party focused on leveraging our experience and expertise to achieve a successful outcome and feel it necessary to advocate for all parties involved to help build a process and a program that better serves the Commission, carriers, and taxpayers.

At the meeting, SNC discussed the Commission's need to clarify that the activities undertaken to prepare and submit Reimbursement Applications are reimbursable under the program. We also believe the FCC should expand the Definition of Covered Equipment and Services to include Optical Switching Equipment and Software. Most notably, the FCC should consider including network management, provisioning, monitoring, billing, and other software required to operate equipment that is on the Qualified Replacement list. The FCC should specifically include Huawei and ZTE optical switching equipment in the Qualified Replacement List.

We also recommended that the reimbursement request be separated into two (2) application submissions or funding phases. They are: 1) Planning: Covers the considerable effort required to qualify the affected equipment and services; site inventory; replacement vendor outreach to; quantify the Replacement and Implementation program costs and schedule, and 2) Replacement and Implementation: Covers various stages of the replacement, implementation, and equipment disposal.

The Commission should ensure that the Prioritized Reimbursable Strategy Does Not Cause or Create Interoperability issues. The FCC should revisit its Priority for Reimbursable items if the authorized funding is deemed insufficient: 1) due to potential issues with the interoperability and security of different equipment vendor's CORE and RAN equipment coexisting, which is not likely to work without assistance from vendors; and 2) security and operational issues that could be created between different vendors.

In 2019, the Commission deemed Huawei and ZTE as national security risks, barring rural carriers from utilizing government funds from purchasing equipment from Huawei and ZTE. Recently, SNC has heard concerns that some operators indicating that Huawei may be already withdrawing network support. This poses a potential risk to current network operations makes planning and integrating new vendors' equipment EXTREMELY difficult and may result in a delay to operators' migration schedules.

Pursuant to Section 1.1206 of the Commission's Rules, this Ex Parte is being filed electronically with the Office of the Secretary.

Respectfully submitted,

Secure Networks Coalition



W. Scott Schelle
Tasman Technologies, LLC
President
10751 Falls Road
Suite 308
Lutherville, MD 21093
Scott@tasmantechnologiesllc.com
(410) 429-4903



A. Richard Burke
Televate, LLC
Managing Partner
1934 Old Gallows Road
Suite 350
Vienna, VA 22182
rburke@televate.com
(703) 639-4201



Gary Monetti
Monetti & Associates, LLC
Founder
163 Mitchells Chance Rd #154
Edgewater, MD 21037
garymonetti@monettiandassociates.com
301-514-7992

Cc: Zenji Nakazawa
Travis Litman