PUBLIC NOTICE

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WIRELINE COMPETITION BUREAU CLARIFIES REIMBURSEMENT ELIGIBILITY OF COSTS INCURRED AFTER REMOVAL, REPLACEMENT, AND DISPOSAL DEADLINE IN RIP-AND-REPLACE PROGRAM

WC Docket No. 18-89

By this Public Notice, the Wireline Competition Bureau (Bureau) clarifies that administrative costs a recipient in the Secure and Trusted Communications Networks Reimbursement Program (Rip-and-Replace Program or Program) incurs to meet Program requirements between its removal, replacement, and disposal deadline (RRD Deadline) and its deadline to finish submitting all reimbursement claims (Reimbursement Claim Deadline) are eligible for reimbursement. Recipients should be aware that the Reimbursement Claim Deadline is the cutoff for recovering such costs, and that after that date no further reimbursement claims can be submitted. Consistent with all Program requirements, reimbursement claims must be for actual costs reasonably incurred and be fully supported by invoices and other cost documentation. The Bureau also addresses other proposals regarding post-RRD Deadline costs.

The Secure and Trusted Communications Networks Act of 2019 (Secure Networks Act) directed the Commission to establish the Rip-and-Replace Program.[1] The Program reimburses eligible providers for reasonable costs incurred in the removal, replacement, and disposal of communications equipment and services produced or provided by Huawei Technologies Company or ZTE Corporation (covered equipment and services).[2] This can include, for example, the costs of replacement equipment, the costs to remove and dispose of covered equipment, and related administrative costs such as legal fees, internal labor, and external engineering and project management work.[3] Pursuant to section 1.50004(p) of the Commission's rules, the Bureau has delegated authority to adopt necessary policies and procedures related to payments, cost estimates, eligible expenses, and other requirements.[4]

Recipients must complete all RRD work "within one year of receiving the initial draw down disbursement from their funding allocation," subject to any general or individual term extensions.[5] That, however, is not the end of a recipient's obligations. After its RRD Deadline, a recipient must submit a

[1] Secure and Trusted Communications Networks Act of 2019, Pub. L. No. 116-124, 134 Stat. 158 § 4 (2019) (codified as amended at 47 U.S.C. § 1603), as amended by Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, § 901, 134 Stat. 1182 (2021) (Secure Networks Act).

[2] 47 U.S.C. § 1603(c); 47 CFR § 1.50004(g); *see generally Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs – Huawei Designation*, PS Docket No. 19-351, Order, 35 FCC Rcd 6604 (PSHSB 2020); *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs – ZTE Designation*, PS Docket No. 19-352, Order, 35 FCC Rcd 6633 (PSHSB 2020).

[3] *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, WC Docket No. 18-89, Second Report and Order, 35 FCC Rcd 14284, 14334-38, paras. 118-27 (2020) (*2020 Supply Chain Order*); *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, WC Docket No. 18-89, Third Report and Order, 36 FCC Rcd 11958, 11991-96, paras. 85-94 (2021) (*2021 Supply Chain Order*).

[4] 47 CFR § 1.50004(p).

[5] 47 U.S.C. § 1603(d)(6); 47 CFR § 1.50004(h).

Final Certification, file all reimbursement claims within 120 days, file a Final Spending Report, complete the closeout process, and answer any related requests for information.[6] Given these obligations, recipients and project management firms asked the Bureau to clarify whether administrative costs incurred after the RRD Deadline are reimbursable.[7] The Bureau sought comment on these requests.[8] Comments were filed on or before June 17, 2026[9] and Reply Comments were filed on June 24, 2026.[10] The Bureau received no comments in opposition to allowing recipients to submit claims for reimbursement of post-RRD Deadline administrative costs.

Reimbursement of Administrative Costs Incurred Between a Recipient's RRD Deadline and Reimbursement Claim Deadline. Consistent with the Commission's delegation to the Bureau to make reimbursement determinations and act on requests for interpretation of the Commission's rules,[11] the Bureau clarifies that post-RRD Deadline administrative costs are reimbursable. Permitting reimbursement for post-RRD Deadline administrative costs is most consistent with the purpose of the Program, which is to reimburse recipients for reasonable RRD-related costs, and with the statutory directive to mitigate administrative burdens and costs for recipients while protecting the Program against waste, fraud, and abuse.[12] Eligible administrative costs are reimbursable when they occur before the RRD Deadline, and the Bureau recognizes they are a necessary part of meeting Program obligations that should likewise be reimbursed when they occur after the RRD deadline.[13] Such reimbursements also can help recipients avoid undue financial hardship in meeting Program obligations.[14]

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[6] 47 U.S.C. § 1603(e)(4) and 47 CFR § 1.50004(m) (Final Certification); 47 CFR 1.50004(g)(2)-(3) (reimbursement claim deadline; the deadline can be extended by an additional 120 days upon request); 47 CFR § 1.50004(i)(2) (Final Spending Report); *Program Requirements Reminder Notice*; Participant Close-out User Guide, https://www.fcc.gov/sites/default/files/close-out-user-guide-082025.pdf; *see also Wireline Competition Bureau Reminds Rip-and-Replace Program Recipients of the Necessary Steps to Complete Program Participation*, WC Docket No. 18-89, Public Notice, DA 26-386 (WCB Apr. 20, 2026).

[7] Comments and Request for Clarification of Summit Ridge Group, WC Docket No. 18-89, at 1 (Apr. 23, 2026) ; Comments of Widelity, Inc., WC Docket No. 18-89, at 1 (Apr. 29, 2026) (Widelity Comments); Letter from Donald L. Herman, Jr., Herman & Whiteaker, LLC, Counsel for Pine Belt Tel. Co., to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 18-89, at 2 (May 14, 2026); Letter from Michael Felicissimo, President, NE Colorado Cellular, Inc. to Joseph Calascione, Chief, Wireline Competition Bureau, Federal Communications Commission, WC Docket No. 18-89 (May 19, 2026).

[8] *Wireline Competition Bureau Seeks Comment on Requests for Clarification in the Rip-and-Replace Program*, WC Docket No. 18-89, Public Notice, DA 26-547 (WCB June 3, 2026).

[9] Comments of Competitive Carriers Ass'n, Rural Wireless Ass'n, and WTA-Advocates for Rural Broadband, WC Docket No. 18-19 (June 17, 2027) (CCA Comments); Comments of Mark Twain Commc'ns, Docket No. 18-19 (June 17, 2027) (Mark Twain Comments); Comments of Nemont Telephone Coop., Docket No. 18-19 (June 17, 2027) (Nemont Comments); Comments of NfinityLink Commc'ns, Docket No. 18-19 (June 17, 2027) (NfinityLink Comments); Comments of Board of Trustees, Northern Michigan Univ., Docket No. 18-19 (June 17, 2027) (NMU Comments); Comments of Pine Telephone Co., Docket No. 18-19 (June 17, 2027) (Pine Comments); Comments of Summit Ridge Group, Docket No. 18-19 (June 17, 2027) (SRG Comments); Comments of Union Tel. Co., Docket No. 18-19 (June 17, 2027) (Union Comments).

[10] Reply Comments of Mediacom Commc'ns Corp., Docket No. 18-19 (June 24, 2027) (Mediacom Reply Comments).

[11] 47 CFR §§ 0.91(b), 0.291, 1.50004(p); *2020 Supply Chain Order*, 35 FCC Rcd at 14336, para. 121.

[12] 47 U.S.C. § 1603(d)(2)(C).

[13] *See* Supply Chain Reimbursement Program Frequently Asked Questions at 16, 31-33 (updated July 7, 2026) (SCRP FAQ) https://docs.fcc.gov/public/attachments/DA-26-679A2.pdf; CCA Comments at 3-5, 10-11; Nemont Comments at 2-3; NMU Comments at 3; SRG Comments at 4; Widelity Comments at 3-4.

[14] CCA Comments at 9-10; Mark Twain Comments at 2-3; Nemont Comments at 3; NfinityLink Comments at 4; Pine Comments at 2; Union Comments at 2.

Permitting recipients to submit claims for post-RRD administrative expenses is also consistent with the Secure Networks Act and the Program rules, neither of which specifically addresses administrative costs or post-RRD Deadline expenses. We agree with the commenters that the primary purpose of the RRD Deadline is to ensure the completion of the actual physical removal, replacement, and disposal of covered equipment and services.[15] Paragraph 101 of the *2021 Supply Chain Order* and the related FAQ accordingly prohibit reimbursement for costs associated with such physical RRD work that are incurred after the RRD Deadline, since there should be no such costs.[16] Nothing, however, suggests that post-RRD Deadline administrative costs were encompassed by paragraph 101 or the FAQ. Further, the Final Certification is due only after the RRD Deadline and the Commission gave recipients 120 days after that deadline to finish the managerial and administrative process associated with submitting reimbursement claims—indicating that post-RRD work was always expected. In context, then, paragraph 101 and the FAQ are best read to apply only to actual physical removal, replacement, and disposal costs for the work that must be done by the RRD Deadline.

For these reasons, the Bureau clarifies that Program recipients can be reimbursed for reasonable costs incurred after their RRD Deadline and before their Reimbursement Claim Deadline for administrative work that is not directly related to the actual physical removal, replacement, and disposal of covered equipment and services.[17] The Reimbursement Claim Deadline is the cutoff for recovering such costs because after that date no further reimbursement claims can be submitted, as a necessary step in closing out a recipient's participation in the Program. Having a specific deadline will also help recipients better plan for completing their post-RRD Deadline work and timely submitting reimbursement claims.[18]

Requests Related to the Reimbursement Claim Deadline. Summit Ridge Group (SRG), one of the project management firms performing Program-related work for recipients, asserts that the 120-day period to submit all reimbursement claims after the RRD Deadline (or 240 days with an extension) will be too short, given past experience and the scope and complexity of the work involved.[19] SRG accordingly urges the Bureau to: (i) "establish a process for further extensions [of the reimbursement claim deadline] where closeout remains incomplete through no fault of the recipient," (ii) "toll the [reimbursement] claim deadline while a timely filed modification or RFI [request for information] response is pending before the Fund Administrator," or (iii) grant six-month RRD term extensions until a recipient completes all Program requirements that come after the RRD Deadline.[20]

The Bureau declines to grant these proposals. As for extending the Reimbursement Claim Deadline, that deadline is set by the Commission's rules, which allow only a "single" 120-day extension for each recipient.[21] SRG's request to toll the Reimbursement Claim Deadline while a timely filed modification or RFI response is pending before the Fund Administrator would be inconsistent with the

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[15] *See* CCA Comments at 6; SRG Comments at 5-6; Widelity Comments at 3.

[16] *2021 Supply Chain Order*, 36 FCC Rcd at 11999, para. 101; SCRP FAQ at 11-12. Paragraph 101 of the *2021 Supply Chain Order* is titled "*Removal, Replacement, and Disposal Term – Reimbursement Claims*," which further indicates it is focused only on reimbursement claims for work done during the RRD term, not after.

[17] "In-the-field" project management expenses are considered part of the actual physical RRD work and therefore would not be reimbursable if incurred after a recipient's RRD Deadline.

[18] For these reasons, the Bureau rejects NfinityLink's request to allow reimbursement for costs incurred after the Reimbursement Claim Deadline. NfinityLink Comments at 2.

[19] Other commenters also ask the Bureau to extend the Reimbursement Claim Deadline for all recipients. *See* Mark Twain Comments at 3; Union Comments at 2. However, we do not find good cause in the record before us to waive any recipients' reimbursement claim deadlines, which are still several months in the future for the parties that have raised this issue in the record.

[20] SRG Comments at 14.

[21] 47 CFR § 1.50004(g)(3).

existing rule, in addition to requiring ongoing recalculation of the deadline and potentially creating a disincentive for the recipient to provide the Fund Administrator with complete support for cost modifications or reimbursement claims at the time of submission. SRG's request to continue granting RRD term extensions to allow recipients enough time to submit all reimbursement claims before their RRD Deadline appears to be moot in light of the Bureau's decision to allow reimbursement for post-RRD Deadline administrative costs, and we do not anticipate granting extensions of the RRD Deadline on the basis of invoicing progress in the future.

One recipient, Mediacom, has completed the closeout process but argues recipients that have already closed out should be allowed to re-enter the Program and seek reimbursement for administrative costs incurred during their reimbursement claim period, arguing that they did not know such costs would be reimbursable.[22] The Bureau declines Mediacom's request. The Program rules do not establish a path for recipients to re-enter the Program after completing closeout, and the rules also specify that any remaining and unclaimed funding allocated to a recipient will automatically revert to the Program for possible use by other recipients after the expiration of the recipient's Reimbursement Claim Deadline.[23] Permitting recipients to receive additional funding after they have completed closeout would be inconsistent with the Commission's rules, and would undermine the finality of the closeout process, which is what enables the Commission to reallocate unused funding where permitted by the rules.

Additional Information and Resources. Recipients with questions may contact the Fund Administrator Help Desk by email at SCRPFundAdmin@fcc.gov or by calling (202) 418-7540 from 9:00 AM ET to 5:00 PM ET, Monday through Friday, except for Federal holidays. General information and Commission documents regarding the Program are available on the Rip-and-Replace Program webpage, https://www.fcc.gov/supplychain/reimbursement.

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[22] Mediacom Reply Comments at 4.

[23] 47 CFR § 1.50004(g)(2).