

Exhibit A

From: [Rosanova, Grace](#)
To: ["Lance Ware"](#)
Subject: RE: [EXTERNAL] FW: R039625_EGS_DE_BE_MOM005_20260423
Date: Monday, April 27, 2026 4:07:00 PM

Hey Lance,

Any chance your day is clearer on Wednesday or Thursday? I didn't realize I'm in training on Tuesday and I want to make sure I find an opportunity to include Bryce because he is also part of the review process.

I have a few questions I was hoping you could look at regarding the payment request. These are things that DOF has asked in the past, and I want to make sure we have a clear answer for them:

1. Can you please provide a justification for the truck purchase. Is the truck on Catalina Island? What will the truck be used for?
2. Can you please provide more information on the use of the building on Sumner? I'm looking to get a sense of why this purchase was necessary and how it will be helpful to the project. I'm looking for information like: What will be housed in the building – Offices? Equipment? Will the building be used as AVX's headquarters? Will staff work there? Why did you choose this property over any other on the island? Etc.
3. There are a few places in the payment request where the term "Administrative" tasks are referenced. This means something very specific to DOF and this project: can you please explain what HMB does and what Administrative Services might mean in the context of their work? Can you please do the same for the work that Julie Ware will be doing – the invoice references Program Administration. There is a 2% cap on project costs for administration, but it is a word that people use to describe a lot of different things, so I want to make sure I understand so that we can make sure to categorize costs appropriately.

Let me know your availability, looking forward to talking this through.

Thanks Lance!
Grace

Exhibit B

From: [Lance Ware](#)
To: [Rosanova, Grace](#)
Subject: Re: [EXTERNAL] FW: R039625_EGS_DE_BE_MOM005_20260423
Date: Monday, April 27, 2026 5:14:01 PM
Attachments: [LauraDux_JennyOnTheBlock.mp3](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Grace,

Wednesday works better than Thursday — any time that day. If Thursday is the only option, 10–12 or after 1:30.

A few quick answers so we can use the call efficiently:

1. Vehicles.

The \$400K line covers a 3–5 vehicle fleet, not a single truck. Pole surveys for low level design, construction and long-term O&M needs are distinct — splice support, OSP/installation across 1,127+ premises, materials, supervisor/site, plus a mainland vehicle to move materials to the barge through end of construction. All vehicles will ultimately domicile on Catalina.

Avalon's vehicle ordinance has a utility carve-out but each permit takes time to secure. We have one. We need the others issued while the grant is active and the operational justification is concrete — much harder later. No rental fleet on the island, and we can't import vehicles in an emergency.

2. 305 Sumner Ave. This is the Avalon Central Office, the “headend” for the submarine cable system. OLTs, core routing, NOC, climate-controlled equipment racks, and splice/staging space make up the bulk of the footprint; office space for island ops staff is secondary to the conditioned equipment space.

Site selection was driven by available inventory and network design. Avalon's commercial inventory is thin and this property met the criteria, proximity along the network path, structural and electrical capacity for carrier-grade telecom equipment, harbor access, and zoning. The centralized location also minimizes the need for remote OLTs in Avalon and potentially the interior (final optical budgets for the West End are still being calculated).

Attached is a short piece by Laura Dukes (Transom Traveling Workshop) featuring a long-time Avalon restaurateur — gives a feel for how the island's land ownership structure works in

practice. About seven minutes. Please give us notice before reusing externally; it hasn't published yet.

3. "Administrative" terminology. Understood on the 2% cap. The labels on the HMB and Julie Ware invoices are imprecise — almost all of the work is project management and technical services, not administration in the DOF sense:

- HMB: marine survey supervision, permit coordination (CPUC, CCC, CSLC, USACE, NMFS, CDFW, etc), route engineering review, marine contractor management, environmental compliance
- Julie Ware: accounting schedule and milestone management, CPUC reporting, stakeholder coordination, vendor onboarding, field operations support

Genuine administrative work (general office, bookkeeping, basic filings) will be carried by other staff and is where the 2% cap will apply.

Hope this helps, but happy to get your feedback ahead of the final review.

Best,

Lance

From: Rosanova, Grace <Grace.Rosanova@cpuc.ca.gov>

Date: Monday, April 27, 2026 at 4:07 PM

To: Lance Ware <lance@avxnetworks.com>

Subject: RE: [EXTERNAL] FW: R039625_EGS_DE_BE_MOM005_20260423

Hey Lance,

Any chance your day is clearer on Wednesday or Thursday? I didn't realize I'm in training on Tuesday and I want to make sure I find an opportunity to include Bryce because he is also part of the review process.

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looking for information like: What will be housed in the building – Offices? Equipment? Will the building be used as AVX’s headquarters? Will staff work there? Why did you choose this property over any other on the island? Etc.

3. There are a few places in the payment request where the term “Administrative” tasks are referenced. This means something very specific to DOF and this project: can you please explain what HMB does and what Administrative Services might mean in the context of their work? Can you please do the same for the work that Julie Ware will be doing – the invoice references Program Administration. There is a 2% cap on project costs for administration, but it is a word that people use to describe a lot of different things, so I want to make sure I understand so that we can make sure to categorize costs appropriately.

Let me know your availability, looking forward to talking this through.

Thanks Lance!

Grace

Exhibit C

Lance Ware
CEO
AVX Networks
949-394-7099

From: Rosanova, Grace <Grace.Rosanova@cpuc.ca.gov>

Date: Friday, May 1, 2026 at 8:47 AM

To: Lance Ware <lance@avxnetworks.com>

Cc: Haro, Lea <Lea.Haro@cpuc.ca.gov>; Minkus, Michael J. <Michael.Minkus@cpuc.ca.gov>;
Ellis, Maria <Maria.Ellis@cpuc.ca.gov>

Subject: Stop Work

Dear Lance,

The AVX reimbursement request submitted on 04/19/2026 has raised significant concerns. All Federal Funding Account reimbursement requests must meet both Capital Project Fund and California Public Utilities Commission criteria of allowable / eligible expenses in order to be reimbursed. This serves as notification that AVX must stop all spending related to its Federal Funding Account award until a review of the reasonableness and appropriateness of its expenses is completed.

Regards,
Grace Rosanova

Grace Rosanova (she/her)

Analyst, Broadband Regional Initiatives
California Public Utilities Commission, Communications Division
✉ grace.rosanova@cpuc.ca.gov

Exhibit D

From: [Rosanova, Grace](#)
To: ["Lance Ware"](#)
Cc: [Haro, Lea](#); [Minkus, Michael J.](#); [Ellis, Maria](#)
Subject: RE: [EXTERNAL] Re: Stop Work
Date: Wednesday, May 6, 2026 9:32:00 AM

Hi Lance,

I'm writing to confirm your email has been received.

We understand your desire to meet regarding the stop work order. Communications Division is preparing a written communication with more information and context. Communications Division will be better positioned to speak after this is provided to AVX.

Thank you,
Grace

From: Lance Ware <lance@avxnetworks.com>
Sent: Monday, May 4, 2026 2:57 PM
To: Rosanova, Grace <Grace.Rosanova@cpuc.ca.gov>
Cc: Haro, Lea <Lea.Haro@cpuc.ca.gov>; Minkus, Michael J. <Michael.Minkus@cpuc.ca.gov>; Ellis, Maria <Maria.Ellis@cpuc.ca.gov>
Subject: [EXTERNAL] Re: Stop Work

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Grace,

Sorry we couldn't connect at 1pm as I suggested, so I'm following up to find a time when we can talk so I can provide further clarification on the FFA expenses if required. It's been almost a week since the review call we had initially planned, and 2+ weeks from our submission. Without input I'm unsure how to address the issues arising from the stop work email.

As you know, AVX got out the starting gate quickly to make sure we can meet the construction timeline in the FFA award, so we entered into a number of vendor contracts to get work started. Stopping has left the work and schedule in limbo, but we keep incurring costs.

AVX has prepared supplemental documentation responsive to your April 27 questions, and I'm looking for your guidance on what else is needed to get the project restarted. I know you're very busy, but I would appreciate a call tomorrow, even if it's just a few minutes so I can get to work right away to get you whatever you need.

Thank you,

Lance Ware
CEO
AVX Networks
949-394-7099

From: Rosanova, Grace <Grace.Rosanova@cpuc.ca.gov>

Date: Friday, May 1, 2026 at 8:47 AM

To: Lance Ware <lance@avxnetworks.com>

Cc: Haro, Lea <Lea.Haro@cpuc.ca.gov>; Minkus, Michael J. <Michael.Minkus@cpuc.ca.gov>;
Ellis, Maria <Maria.Ellis@cpuc.ca.gov>

Subject: Stop Work

Dear Lance,

The AVX reimbursement request submitted on 04/19/2026 has raised significant concerns. All Federal Funding Account reimbursement requests must meet both Capital Project Fund and California Public Utilities Commission criteria of allowable / eligible expenses in order to be reimbursed. This serves as notification that AVX must stop all spending related to its Federal Funding Account award until a review of the reasonableness and appropriateness of its expenses is completed.

Regards,
Grace Rosanova

Grace Rosanova (she/her)

Analyst, Broadband Regional Initiatives
California Public Utilities Commission, Communications Division
✉ grace.rosanova@cpuc.ca.gov

Exhibit E



PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102
300 CAPITOL MALL | SACRAMENTO, CALIFORNIA 95814

May 8, 2026

Lance Ware
AVX Networks
lance@avxnetworks.com

Re: Last Mile Federal Funding Account Project – Digital Equity for Coastal and North Orange County and Catalina Island

Dear Lance Ware,

On December 18, 2025, the California Public Utilities Commission (Commission) approved AVX Network's Digital Equity for Coastal and North Orange County and Catalina Island application for \$37,571,833.00 in last mile Federal Funding Account funding in Resolution T-17896.

Reimbursement requests must meet both Capital Project Fund (2 Code of Federal Regulation Part 200, Subpart E) and Commission (Decision 22-04-055, Appendix A) criteria of allowable / eligible expenses in order to be reimbursed. Awardees are required to follow both State and Federal guidelines to be reimbursed. Any expenses that do not meet the requirement threshold will be denied payment.

On April 19, 2026, AVX Networks submitted a 10% reimbursement request for \$2,559,284.03. Communications Division staff reviewed the reimbursement request and supporting documentation, which raised significant concerns about the requested expenses meeting the Federal Funding Account's criteria for allowable and reasonable expenses. Specifically, the following concerns and questions have been identified:

1. Fleet vehicle. A fleet vehicle was purchased but the reimbursement request did not include a robust justification for why the specific make, model, and premium trim package was selected. In accordance with Code of Federal Regulation Part 200, Section 200.439, vehicle purchases require prior approval and costs are limited to a reasonable amount to complete the project. AVX Networks must:
 - a. Provide a justification why it chose a vehicle that costs double those with lower trim packages and greater tow capacity.
 - b. Explain how the purchase of the vehicle comports with Code of Federal Regulation Part 200, Section 200.404.



- c. Explain why prior approval for the purchase of the vehicle was not sought.
2. Contracting costs and relationships. AVX Networks has requested salary reimbursement through a contracting company, of which Lance Ware is the sole owner, to provide payment to Lance Ware and Julie Ware. It is unclear what the relationship is between Lance Ware and Julie Ware. Entities must have in place a documented nepotism and related policies. AVX must:
 - a. Explain who is Julie Ware in relation to this project and what her relationship is to Lance Ware.
 - b. Explain what services will be provided that justify the proposed yearly salary of \$250,000 for Lance Ware and \$200,000 for Julie Ware.
 - c. Provide payroll documents to show hours solely worked on this project.
 - d. Provide copies of nepotism and related policies.
3. Purchase of a house. The reimbursement request includes the purchase of a house and a link to a podcast discussing property acquisition difficulties on Catalina Island. The reimbursement request did not include prior approval in accordance with Code of Federal Regulation 200 Section 200.439; why a home was purchased; or justification of why the purchase was necessary for the project. AVX must:
 - a. Explain why was a residential property purchased instead of a commercial building.
 - b. Provide information about the seller and related purchase documentation.
 - c. Explain why was this specific property chosen.
 - d. Explain why was the appraisal cost is higher than neighboring buildings.
 - e. Explain why the appraisal cost of the property was submitted in the payment request.
 - f. Explain how the property comports with Code of Federal Regulations, Section 200.311?
 - g. Explain and provide documentation for why SC-special commercial zoning allows for the intended use case.
 - h. Provide architectural drawing(s) and construction cost estimates for how the building will be converted and utilized.
 - i. Provide cost analysis for why a brick and mortar central office will be more cost effective than a remote optical line terminal.
 - j. Explain what efforts were made to explore leasing office/commercial space for the duration of the project and why this was not done instead of purchasing a residential property?
4. Administrative Costs. AVX Networks submitted various expenses under administrative costs but did not provide sufficient documentation or explanation. AVX Networks must:
 - a. Provide an explanation for "Model Development" for the Wolf Advisory invoice.
 - b. Provide a contract, a description of work completed, and record of hours worked for the Wolf Advisory invoice that demonstrates the work conducted was solely for the Digital Equity Project.



- c. Provide a contract that demonstrates that the iCommLaw invoice is solely for services rendered for the Digital Equity project.
 - d. Provide a labor contract, a record for hours worked, proof of payment, and an explanation of work conducted, and how it is an allowable expense for the Kanatsiz Communications, Inc. invoice.
5. Engineering. AVX Networks submitted various invoices for engineering expenses but did not provide sufficient explanation or documentation. AVX Networks must:
- a. Provide a contract, an explanation of services rendered, and hours work for the HMB Solutions invoices.
 - b. Provide proof of payment for the EGS invoice. This program does not reimburse for advance payments or deposits.
 - c. Provide proof of payment for the Blue Meridian invoice.

AVX must provide justification for the above expenses and an explanation of why it failed to obtain prior approval for purchases by May 15, 2026.

Communications Division issued a stop work order on May 1, 2026. The CPUC will not reimburse any costs that were incurred after the stop work order was issued and the grant may not resume until written notification is provided to AVX Networks.

The Communications Division will not pay for costs incurred on this project until concerns are addressed, fiscal controls are in place to comply with the grant terms and conditions, and corrective actions have been implemented if deemed necessary. Further, Communications Division may consider alternate actions, including re-evaluating AVX Network's viability, recommending a financial monitor, and / or recommending the Commission withdraw the award.

Additionally, you are directed to retain original, unaltered copies of any record, in whatever form, that relates to your performance under the grant or any claim of reimbursement under the grant.

Sincerely,

A handwritten signature in black ink that reads "Maria Ellis". The signature is written in a cursive, flowing style.

Maria Isabel Ellis
Director of Broadband Initiatives

Exhibit F

From: [Lance Ware](#)
To: [Rosanova, Grace](#); [Ellis, Maria](#); [Minkus, Michael J.](#); [Haro, Lea](#)
Cc: [Anita Taff-Rice](#)
Subject: [EXTERNAL] Re: Letter to AVX
Date: Friday, May 15, 2026 2:46:44 PM
Attachments: [0 AVX Networks Repsonse.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Maria, Lea, Michael, and Grace:

I just noticed the bounced messages in my Junk folder, and I am resending this email with the requested documentation placed on OneDrive. Please let me know if you'd prefer it delivered another way.

 [AVX CPUC Reply Package.zip](#)

Thank you and have a nice weekend,

Lance Ware
CEO
AVX Networks
949-394-7099

From: Lance Ware <lance@avxnetworks.com>
Date: Thursday, May 14, 2026 at 8:48 PM
To: Rosanova, Grace <Grace.Rosanova@cpuc.ca.gov>
Cc: Ellis, Maria <Maria.Ellis@cpuc.ca.gov>; Minkus, Michael J. <Michael.Minkus@cpuc.ca.gov>; Haro, Lea <Lea.Haro@cpuc.ca.gov>; Anita Taff-Rice <anita@icommlaw.com>
Subject: Re: Letter to AVX

Maria, Lea, Michael, and Grace:

Attached please find AVX Networks' response to your letter of May 8, 2026 regarding AVX's reimbursement request under California Public Utilities Commission Resolution T-17896, together with the supporting attachments referenced therein.

AVX has requested confidential treatment under General Order 66-D for the attachments identified as CONFIDENTIAL in the Declaration of Confidentiality.

AVX welcomes the opportunity to walk Communications Division staff through the underlying work product for any item discussed in the response. AVX also requests a regular cadence of

communication with Communications Division going forward to support efficient resolution of any further documentation questions, and would welcome the opportunity to host staff for a Catalina Island site visit at your convenience.

AVX appreciates the Commission's continued support of this critical infrastructure project for the unserved communities of Catalina Island and welcomes prompt resolution of the matters addressed in the response, including the lifting of the May 1, 2026 stop-work hold.

Respectfully,

Lance Ware

Chief Executive Officer

AVX Networks

CPCN U-7406-C

cc: Anita Taff-Rice, iCommLaw (counsel for AVX Networks)

From: Rosanova, Grace <Grace.Rosanova@cpuc.ca.gov>

Date: Friday, May 8, 2026 at 4:31 PM

To: Lance Ware <lance@avxnetworks.com>

Cc: Ellis, Maria <Maria.Ellis@cpuc.ca.gov>; Minkus, Michael J.
<Michael.Minkus@cpuc.ca.gov>; Haro, Lea <Lea.Haro@cpuc.ca.gov>

Subject: Letter to AVX

Dear Lance,

This letter is being sent on behalf of Maria Ellis.

Thank you,
Grace

Grace Rosanova (she/her)

Analyst, Broadband Regional Initiatives

California Public Utilities Commission, Communications Division

✉ grace.rosanova@cpuc.ca.gov

Exhibit G

PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102
300 CAPITOL MALL | SACRAMENTO, CALIFORNIA 95814

July 7, 2026

Lance Ware
Chief Executive Officer
AVX Networks
lance@avxnetworks.com

Re: AVX Networks' Federal Funding Account award FFA 00150

NOTICE OF TERMINATION

Dear Lance Ware,

Please be advised that, pursuant to Section 17 of the Federal Funding Account Program Rules, the Federal Funding Account Award to AVX Networks is hereby terminated, effective July 17, 2026.

On December 18, 2025, the California Public Utilities Commission (Commission) adopted Resolution T-17896 approving AVX Networks' Federal Funding Account application for up to \$37,571,833 in grant funds for the Digital Equity for Coastal and North Orange County and Catalina Island project.

On April 19, 2026, AVX Networks submitted a reimbursement request for \$2,559,284.03. On May 1, 2026, Communications Division sent an email notifying AVX Networks that the invoices submitted raised concerns and to stop all spending related to its Federal Funding Account award until a review of the reasonableness and appropriateness of the expenses could be completed. AVX Networks was reminded that Federal Funding Account awardees must meet Capital Project Fund and California Public Utilities Commission criteria of allowable / eligible expenses in order to be reimbursed.

Communications Division sent a follow-up letter on May 8, 2026, reiterating that the reimbursement request and supporting documentation raised significant concerns about the requested expenses meeting the Federal Funding Account's criteria for allowable and reasonable expenses. The letter further specified the additional information AVX Networks must submit for Communications Division to evaluate the request and reinforced that the project is under a stop work order and that no further action on the grant should be taken by AVX Networks until it receives a written notification from Communications Division to resume. AVX Networks submitted a response on May 15, 2026.

After careful consideration, Communications Division has determined that AVX Networks has not submitted adequate supporting documentation and justification of how project expenditures meet the Federal Funding account or Capital Project Funds requirements. The issues are summarized below.

1. Purchase of residential real estate

- a. Communications Division requested a justification for the purchase of residential real estate for the project. AVX Network submitted a response, which included a podcast describing real estate challenges on Catalina Island. AVX Networks also provided information on the commercial property alternatives that were explored and an explanation of why AVX Networks considered a remote Optical Line Terminal (OLT) insufficient.
- b. AVX Networks did not provide supporting engineering documentation to demonstrate that a remote OLT was insufficient. Further, AVX Network's response characterized a residential property as necessary because of climate change and rising sea levels while the property appears to be in a flood zone according to the Federal Emergency Management Agency (FEMA) flood map.
- c. AVX Networks' response indicates a purchase price for the property of \$1.5 million, and \$2 million in renovations. AVX Network's responses do not provide documentation to demonstrate the \$3.5 million real estate expenditure or how the expenditure is necessary to complete the project. The documentation and justification fails to meet the reasonableness standards in the Code of Federal Regulations Part 200 (CFR), Section 200.400. In addition, AVX Networks failed to request approval prior to the purchase of the property, and therefore, does not meet the requirements in CFR 200, Section 400.439.
- d. Communications Division requested more information about the seller related to the purchase of the property. AVX Networks confirmed that the property is currently owned by Estamos Perdidos, an LLC of which Lance Ware is the sole member. It appears that Lance Ware sold a property from one company of which he is the President to another of which he is also the President. Reasonable justification for this non-arm's length transaction was not provided. The purchase of the property does not meet the reasonableness standards in CFR 200, Section 202.404.

2. Contracting Costs

- a. Communications Division requested an explanation for the salary reimbursements submitted through a third-party corporation, DEC, LLC of which Lance Ware is the sole owner, an explanation of contracting costs and relationships, a justification about salaries paid to Lance Ware and Julie Ware, payroll documents, and a copy of the nepotism policy. AVX Networks failed to submit an adequate justification for the use of a subcontractor for owner wages, adequate justification demonstrating that the salaries paid to Lance and Julie Ware are reasonable for a small company, and payroll documents

detailing hours performed solely on this project. The invoices do not meet the reasonableness standards in the CFR 200, Section 200.404. This also does not follow competitive sourcing requirements, does not meet CFR 200, Section 200.319, and raises concerns about a conflict of interest.

3. Fleet Vehicle

- a. Communications Division requested that AVX Networks explain why it chose a fleet vehicle with a luxury trim package and racing parts, including leather seats rather than a lower trim vehicle suitable to construction projects. AVX Networks cited island specific concerns such as access to maintenance and rugged terrain. AVX Networks has failed to provide sufficient documentation and explanation to support this purchase. AVX Networks did not obtain approval prior to the purchase of this vehicle and fails to meet the requirement in CFR 200, Section 400.439. This purchase does not comport with reasonableness standards outlines in the CFR 200, Section 404.

4. Administrative Costs

- a. Communications Division requested the contract between AVX and Wolf Advisory, and a description of work completed in the invoice. A justification and supporting documents were not provided and AVX agreed to remove the expense.
- b. Communications Division requested a contract, record of hours worked, proof of payment and justification for work performed by Kanatiz Communications. AVX Networks provided proof of payment, but no sample work nor a Master Service Agreement (MSA) to justify the monthly retainer fee. AVX Networks has failed to provide adequate explanation and documentation to support this invoice, and therefore, it does not meet the standard for adequate documentation in the CFR 200, Section 400.403.
- c. Communications Division requested documentation demonstrating iComm Law invoice is solely for services related to the project. AVX Networks provided an invoice with billed hours, a description of services attached, and an addendum to a retainer agreement. The itemized bill contains legal work completed outside of the scope of the Federal Funding Account project, including unallowable charges for legal work on AVX Networks' fixed wireless antennas, and does not meet the requirements in CFR 200, Section 200.459.

5. Engineering

- a. Communications Division requested proof of payment for the EGS invoice. AVX Networks provided a contract but did not provide proof of purchase, copy of deliverables, or demonstrate that goods or services were obtained. The contract and Gantt chart indicate the work included in the invoice is not expected to be completed until October 10, 2026. AVX Networks has failed to provide supporting documentation to support this invoice and therefore, does not meet the requirements for adequate documentation in the CFR Part 200, Section 400.403.

- b. Communications Division requested a contract, explanation of services rendered and hours worked for HMB Solutions to demonstrate the type of work conducted and proof of payment for engineering work. AVX Networks provided a copy of the contract with HMB Solutions and a billing backup document with a fixed fee schedule, which is not commensurate with the work completed. AVX Networks also failed to submit a schedule of hours worked. AVX Networks has failed to submit adequate documentation to support this invoice and does not meet the cost reasonableness requirements in CFR Part 200, Section 200.404.

The foregoing analyses and citations to the Code of Federal Regulations are non-exhaustive and are subject to revision pending further investigation and review.

As Communications Division has determined that AVX Networks has not submitted adequate justification and documentation to support the reimbursement request, the request is denied without prejudice. To date, Communications Division has not made any reimbursement payments for this project. To safeguard and protect public funds, Communications Division does not make reimbursements for requests that do not provide adequate justification, prior approval, documentation, and meet federal and state program requirements.

This letter memorializes Communication Division's intention to formally begin the process to recommend rescinding the Federal Funding Account award pursuant to Section 17 of the Program Rules and further based on AVX Networks' inability to submit adequate documentation to support invoices and failure to meet the requirements in Title 2 CFR Part 200.

Please direct any questions to Legal Division's Ian Culver at Ian.Culver@cpuc.ca.gov.

Regards,



Maria Isabel Ellis
Director of Broadband Initiatives
Communications Division