

Evaluation of WMATA's Radio and Cellular Infrastructure Replacement Project

July 23, 2026

OIG 27-01





Results in Brief

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Evaluation Objective

The objective of this evaluation was to assess how well the Washington Metropolitan Area Transit Authority (WMATA) manages and oversees the Radio and Cellular Infrastructure Replacement Project (Radio Project) against the new baseline and milestones.

Why We Did the Evaluation

- This evaluation was included in the Annual Audit and Evaluation Plan for Fiscal Year 2026.
- We conducted this evaluation in response to the Washington Metrorail Safety Commission's (WMSC's) Special Study of the project, dated August 4, 2025. In the Special Study report, WMSC recommended that WMATA's Office of Inspector General take note of issues pursuant to the radio system and the progress of the Radio Project to date and provide any additional oversight necessary.

Recommendations

This report provides four recommendations to improve project management, oversight, and risk controls related to this and future similar projects.

What OIG Found

The project is significantly behind schedule due to contractor delays and issues installing the fiber optic cable. Moreover, WMATA does not have adequate controls to ensure that contractors charge fair and reasonable prices on this project. This has led to lengthy negotiations over contract changes, further delaying the project and increasing costs.

The new radio system is essential for WMATA to ensure passenger and operator safety. WMATA should consider all contractual options available to ensure the project is completed without additional delays.

Specifically, OIG's evaluation found that:

1. The project continues to experience delays and is significantly behind schedule.
2. WMATA cannot ensure fair and reasonable pricing on radio contractor change order proposals.

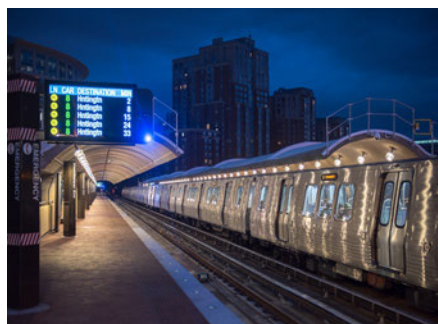


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WMATA initiated a project to upgrade its radio system in January 2016. This project, the Radio and Cellular Infrastructure Replacement Project (Radio Project), aims to upgrade WMATA's internal radio system, the Public Safety Radio System used by first responders, and provide improved cellular coverage throughout the Metrorail system. The project includes work under two contracts: contract FQ15000 (the Radio Contract) and contract FIRPG211190 (the Fiber Optic Cable and Metro Box Enclosure Contract (Fiber Contract)). Although this project began in 2016, the Radio Project has faced major delays and is now scheduled for completion in the summer of 2027.

In August 2025, the Washington Metrorail Safety Commission (WMSC) released its *Special Study of WMATA Metrorail's Radio Band Infrastructure Replacement Project: Program Completion Could Address Radio Communication Deficiencies and Improve Safety at WMATA Metrorail*.¹ The WMSC concluded that WMATA's continued lack of reliable radio communications poses an ongoing safety risk and recommended that WMATA's Office of Inspector General (OIG) take note of the contracts associated with the radio modernization effort and conduct any additional oversight necessary.

Given WMSC's safety findings and the importance of restoring reliable radio communication across the Metrorail system, timely execution of the Radio Project remains central to both safety and accountability. The objective of OIG's evaluation is to assess the effectiveness of WMATA's project management, oversight, and risk controls for the Radio Project. The evaluation focuses on recent activities and progress against milestones set in September 2023 and aims to provide a current look at WMATA's management and oversight, with a focus on FY 2026.

In addition to the WMSC recommendation, the Infrastructure Investment and Jobs Act (IIJA) requires that OIG assess the effective use of funding to address major capital improvement projects, such as the Radio Project. Section 30019(f)(2) of the IIJA conveys that WMATA should prioritize the ongoing integration of new wireless services and emergency communications networks. Additionally, it should leverage partnerships with mobility services to enhance the competitiveness of its core business. In response to this guidance from Congress, OIG included an evaluation of the Radio Project in its Audit and Evaluation Plan.

¹ The WMSC's *Special Study of WMATA Metrorail's Radio Band and Infrastructure Replacement Project*, August 4, 2025 <[Special-Study-Radio-Band-Infrastructure-Rep-Project-Report-08042025.pdf](#)>

WMSC Special Study

The WMSC study focused on ongoing safety issues at WMATA Metrorail resulting from inconsistent and unintelligible radio coverage. The study included 64 WMSC investigation reports citing communication issues between 2019 and 2024, 15 systemwide outages in early 2025, and radio failures that complicated the emergency response to a January 2025 fatality. Since beginning in January 2016, WMATA's efforts to address these problems - the Radio Project - have faced major delays. The WMSC identified four causes of those delays: early prioritization of cellular work, fiber-design flaws stemming from inadequate redundancy, inclusion of unrelated stakeholder fiber needs, and COVID-19 work restrictions.²

Contracts and Milestone Dates

By September 2023, the deadlines from the original contracts for the Radio Project had passed without completion. On September 25, 2023, WMATA approved a substantial contract modification of the Radio Contract to establish a new project baseline. This modification included revised schedules and milestones for completion by December 2025 and September 2026 (see **Table 1**).

**Table 1: Radio Contract Original and Revised Milestone Dates
(per September 2023 Modification)**

Milestones	Project Completion Phase	Original Completion Dates	Revised Completion Dates
Milestone 1	Above-Ground System Substantial Completion	12/25/2019	12/1/2025
Milestone 2	Below-Ground System Substantial Completion	12/22/2021	9/30/2026

The milestone dates in **Table 1** pertain to work to be completed by the contractor on the Radio Contract. However, the Radio Project completion is also contingent on the completion of radio fiber work on the Fiber Contract. The Fiber Contract has two components – radio fiber and Metro box

² Additional background on the history of the radio modernization effort, project delays, and the safety implications of continued communication challenges is discussed extensively in the WMSC study.

enclosure work, and IT ancillary work.³ Like the Radio Contract, the Fiber Contract set new milestones in November 2025 following major design changes and scope adjustments (see **Table 2**).

**Table 2: Fiber Contract Original and Revised Milestone Dates
(as of November 7, 2025 Modification)**

Milestones	Project Completion Phase	Original Completion Dates ⁴	Revised Completion Dates
Milestone 1	Radio/Metro Box Enclosure Installation	1/17/2024	4/7/2026
Milestone 2	IT Ancillary Work Complete	1/26/2026	11/12/2026

Because the September 2023 Radio Contract modification now serves as the operative baseline for project performance, OIG's evaluation focuses on whether WMATA and its contractor are meeting the revised deadlines and requirements established therein. However, the milestone dates for the above-ground portion of the Radio Contract and the radio portion of the Fiber Contract passed during this evaluation and neither task is complete as of May 31, 2026. In addition, WMATA and the radio contractor have not established new milestone dates.

Radio Project Budget and Funding

The initial budget for the Radio Project in 2016 was \$332 million. However, as the Radio Project evolved and delays accumulated, the costs increased, with a current budget of \$609 million. Funding for the Radio Project has been provided through Federal grants, Federal grant matches by local jurisdictions⁵ dedicated funding,⁶ system performance funds,⁷ contributions from a consortium of cellular service providers, and WMATA debt issuance.⁸ As of February 17, 2026, \$470.2 million of the project has been funded through these sources (see **Figure 1**).

³ Only the work on the radio fiber/Metro box enclosure portion of the Fiber Contract is related to the Radio Contract.

⁴ Radio fiber work began in 2016 and was initially handled by WMATA. WMATA originally planned to have the fiber work completed no later than July 2021. As the project fell behind schedule, WMATA opted to hire a contractor to complete the remaining fiber work in February 2022.

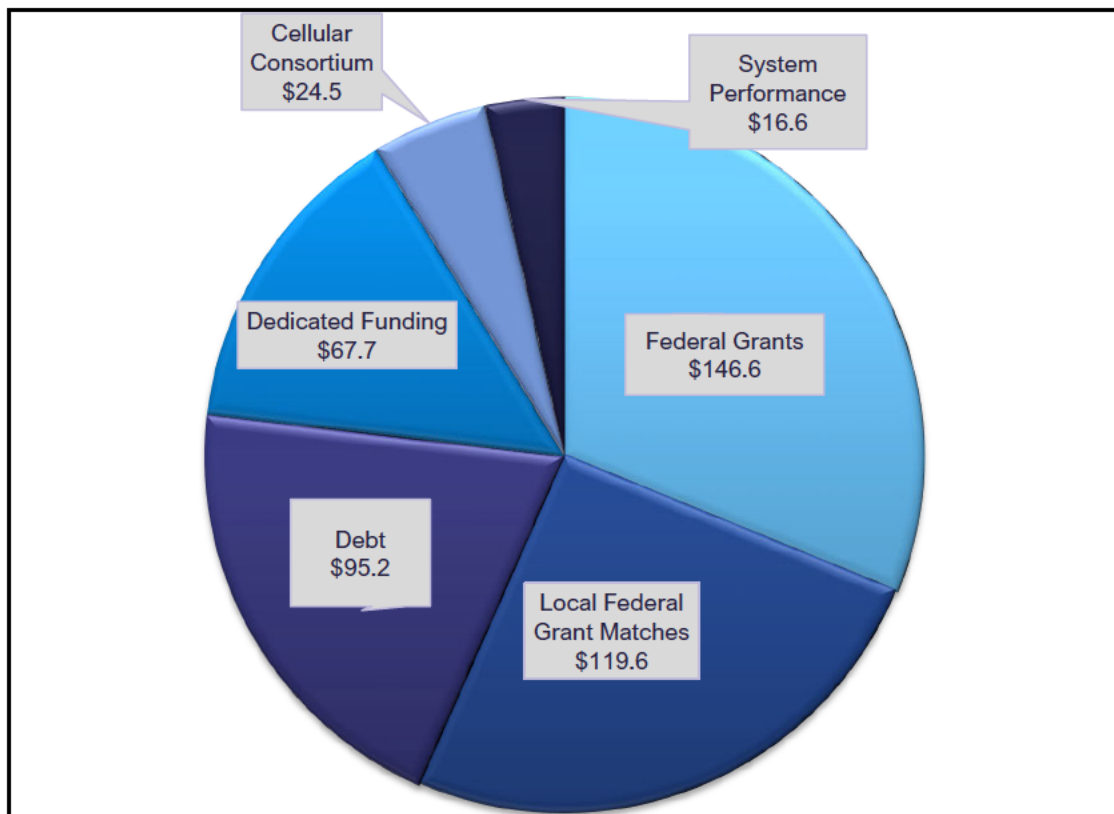
⁵ The District of Columbia, Maryland, and the local governments in Northern Virginia provide annual capital funding in the form of "allocated contributions." Included in these contributions are the required local match to federal formula, competitive, and other grants.

⁶ Dedicated funds received through Virginia, Maryland, and Washington, D.C. jurisdictions serviced by WMATA.

⁷ System performance is a type of non-Federal funding provided by the jurisdictions via the Capital Funding Agreement (CFA). It is different from dedicated funds.

⁸ Dedicated revenue bonds (debt) are paid down by jurisdictional dedicated funds.

Figure 1: Radio Project Funding Sources (in millions) Disbursed as of February 2026



Based on the Radio Project budget and funding received to date, the Radio Project will require an additional \$140 million in funding. The Radio Project is not slated to receive any additional Federal funding going forward. Rather, the primary source of funding will be through WMATA debt issuance.

Finding 1: Despite WMATA's Efforts to Prioritize the Radio Project, the Project Continues to Experience Delays and is Significantly Behind Schedule

Despite WMATA and the contractor establishing a new baseline and milestones for the Radio Contract in September 2023, the Radio Project experienced further delays and has already fallen behind even the new agreed-upon schedule as shown in Table 3.

Table 3: Revised and Estimated Milestone Dates for the Radio Project

Milestones	Project Completion Phase	Milestone Completion Dates (as of 9/2023)	Contractor's Estimated Completion Dates (as of 1/2026)⁹	Lapse (calendar days)
Milestone 1	Above-Ground System Substantial Completion	12/1/2025	3/18/2027	472 days
Milestone 2	Below-Ground System Substantial Completion	9/30/2026	8/5/2027	309 days

Two key areas – (a) design changes which increased the scope of the Fiber Contract, and (b) contractor performance issues on the Radio Contract – have both contributed to delays over the last three years. While WMATA has taken steps to address issues associated with both contracts, contractor performance issues persist and continue to hinder the Radio Project's progress.

Fiber Project Design Changes Caused Delays

Because the Radio Project is contingent on completing relevant portions of the Fiber Contract (including the radio cabling and Metro box enclosure work), Fiber Contract delays impact the timeline for completing the below-ground component of the Radio Project.

Shortly after awarding the Fiber Contract in February 2022, WMATA made major changes to the Fiber Project's basis of design.¹⁰ The design underwent many revisions and additions to the IT ancillary portion of the work from 2022 through 2025. This shift in focus – as the IT ancillary

⁹ These dates reflect the Radio Contract contractor's estimate as of January 15, 2026.

¹⁰ A basis of design is a foundational engineering document detailing the principles, assumptions, and criteria used for design decisions. It bridges the gap between what the project needs and how it will be built.

work was not required to support the Radio Contract work – caused the Radio Project to fall well behind its original schedule. To curb the Fiber Contract’s expanding scope and to re-prioritize the Radio Contract work, WMATA issued a Stop Work Order on the IT ancillary portion of the Fiber Contract in September 2024. WMATA also worked with the contractor to remove many aspects of the IT ancillary work. Finally, on November 7, 2025, WMATA approved a contract modification setting a new delivery schedule for radio fiber work. The modification set a milestone date for completion of the radio cabling and Metro box enclosure work of April 7, 2026 (as shown in **Table 2**).

Less than four months later, however, the project fell behind schedule again. As of February 20, 2026, the Fiber Contract contractor estimated that all radio fiber work will be completed by August 28, 2026, which is more than four months past the milestone date. Moreover, the work is likely to face additional delays due to damage to fiber-optic cabling from train strikes (*i.e.*, ice on roof of train car striking cabling/equipment), which are believed to be linked to the January 2026 winter storm in the metro area.

The Radio Project is contingent on the completion of the radio cabling and Metro box enclosure portion of the Fiber Contract. Since September 2024, WMATA’s efforts to prioritize the radio cabling portion of the fiber contract work, along with removing the scope from the IT ancillary work have resulted in improved progress on the Radio Project. However, the radio cabling of the Fiber Contract is slightly behind schedule, and damage to fiber cabling work caused by the January 2026 train strikes will likely cause additional delays.

Contractor Performance Issues on the Radio Contract

Over the course of the Radio Contract, WMATA has had several issues with contractor performance, including not adhering to the schedule, not meeting contract requirements, insufficient design work, and deficient scheduling. Even after the 2023 re-baselining, issues persist. For fiscal year (FY) 2026, OIG tracked the following four issues with the contractor responsible for radio cabling. These issues do not represent all issues ongoing with the Radio Contract, but rather highlight the primary ones that received significant attention from the WMATA project team.

- Missing and Inadequate Time Impact Analyses to Support Extension of Milestones or Period of Performance

According to the Radio Contract, the contractor must provide a Time Impact Analysis (TIA) for any directed contract change or a Request for Equitable Adjustment (REA), specifying the impact of the change or delay on the contract's milestones or period of performance. A TIA is critical to justify a time extension, in part because without a TIA, WMATA cannot assess which delays the contractor may not be responsible for. In response to multiple contractor REAs throughout 2025 that, in part, requested an adjustment to the project schedule, WMATA requested TIAs. However, the contractor has yet to submit a suitable TIA. In January 2026, WMATA requested a TIA to justify another extension to project milestone dates because the contractor did not meet the agreed-upon December 1, 2025, milestone deadline for completing the above-ground work. WMATA rejected the TIA due to insufficient evidence of attributable schedule impacts. As of May 6, 2026, the contractor has not submitted a suitable TIA to WMATA.

- Un-Repaired Leaking Generators

Beginning in early 2023, WMATA identified defective power generators with oil leaks installed at antenna tower sites. WMATA's initial assessments indicated the leaks could be resolved by replacing the generator's oil pan. The Radio Contract makes the contractor responsible for such power generators at the sites. As WMATA identified the problems, it asked the contractor to repair seven leaking generators already installed at antenna tower sites and to proactively address any defects likely to exist in any generators yet to be installed. The contractor took over two years to repair five of the seven generators. As of mid-January 2026, two generators remained unrepaired and the contractor has not taken proactive measures to address likely defects with five generators awaiting installation at other antenna tower sites. However, after a January 2026 meeting between WMATA and the contractor, the contractor scheduled inspections of the five remaining generators and is preparing a corrective action plan to remediate the remaining generators with oil leaks. WMATA is monitoring the status of the corrective action plan. However, as of May 6, 2026, there has been no significant change in status.

- Non-Compliant Bi-Directional Amplifiers (BDAs)

WMATA issued three Non-Conformance Reports (NCRs) to the contractor between August 14 and September 19, 2025, related to the BDAs, which boost the underground radio signal. While investigating a BDA that failed due to overheating in the summer of 2025, WMATA found that multiple BDAs were noncompliant with Radio Contract requirements. In the NCRs, WMATA required the contractor to submit a corrective action

plan to resolve the problem. As of May 6, 2026, the contractor had not submitted a corrective action plan.

- Missing/Late Submittals of Documentation Needed by WMATA

The contractor substantially completed several antenna tower sites two or more years ago but has yet to submit the documentation required under the Radio Contract, including building permits, site audits, and various testing documentation. WMATA needs these documents to obtain Temporary Use Notices from WMSC to activate the new 700 MHz radio system for the antenna tower sites in railyards. After a January 2026 meeting with WMATA, the contractor began submitting some of the required documentation. WMATA is currently in the process of obtaining Temporary Use Notices from WMSC.

Contractual Remedies Available to WMATA

Under the Radio Contract, WMATA has remedies available to address contractor issues. WMATA is contractually entitled to liquidated damages due to the contractor's failure to complete the above-ground radio work by its milestone date of December 1, 2025. WMATA also has the option to terminate the contract for default and file a performance bond claim. A performance bond claim involves notifying the contractor's surety of a contract default and calling on the surety to provide a remedy in the way of a cash settlement, finding a new contractor to complete the work, or other methods agreed upon to complete the Radio Project.

- Liquidated Damages

The September 2023 modification, which extends the contract period of performance and establishes new milestones, contains a liquidated damages clause. This clause states that if the contractor fails to complete all or portions of the work described in the Milestones and the re-baselined Radio Project schedule, the contractor shall pay liquidated damages to WMATA. The damages are listed at \$4,500 for each calendar day of delay until the work is completed or accepted and capped at a maximum of \$5 million. Therefore, if WMATA elected to exercise the liquidated damages clause in the contract modification, the contractor would be liable for \$405,000 in damages as of March 1, 2026. Additional liquidated damages for Milestone 2 (due September 30, 2026) would also likely be due based on the contractor's estimated date of completion (August 5, 2027).

- Termination for Default

The Radio Contract contains a Termination for Default clause. The clause states that WMATA may terminate the contract for default if the contractor “refuses or fails to prosecute the work, or any separable part thereof, with such diligence as will ensure its completion within the time specified in this Contract, or any extension thereof, or fails to complete said Work within such time...” In the event of a Termination for Default, the contractor and its sureties are liable for damages to WMATA resulting from the contractor’s failure to complete the work. However, the Radio Contract provides that the contractor’s right to proceed with the work should not be terminated if the contractor can demonstrate that the delays were caused by reasons outside of the contractor’s control. In that case, the WMATA Contracting Officer must decide whether there is justification to grant a contract extension.

Delays have been prevalent over the ten-plus years of the Radio Project. Recently, WMATA adjusted the associated Fiber Contract work and increased project management oversight to address these delays and prioritize completion of the Radio Project. WMATA must continue to closely monitor the Radio Project’s progress and determine if it is necessary to implement contractual remedies under the Radio Contract to help ensure the timely completion of the Radio Project. In addition, senior WMATA management and legal counsel must coordinate with the Radio Project team on the appropriate course of contractual action going forward.

Recommendations

OIG recommends the GM/CEO:

1. Enforce and enhance contract management controls, including structured schedule monitoring, documented performance reviews, and timely corrective actions, to ensure the radio contractor meets requirements and milestone deadlines

Management Response

The Department of Communication and Signaling (COSI) Radio Project team concurs with the recommendation and will continue to practice strong contract management controls to maintain contractor accountability, including contract performance and schedule adherence. The project team, working with Procurement, will continue to require complete, supportable, and contract-compliant Time Impact Analyses for all claimed delays, reject deficient

submissions, require prompt resubmission, and deny schedule extensions that lack adequate support. The project team, with Procurement's support, will continue to conduct routine contractor performance reviews to evaluate milestone adherence, responsiveness to deficiencies, and compliance with contract requirements. These reviews will document recurring issues, including unresolved generator defects, open non-conformance reports for Bi-Directional Amplifiers, and incomplete or late submittals needed for approvals.

The team will continue to require corrective action plans for all material deficiencies. Each plan will identify the root cause, define corrective actions, and establish firm completion dates. The team will continue to track progress and escalate matters up to senior management and Procurement when the contractor does not demonstrate timely improvement. The team will continue to enforce submittal requirements by tying work acceptance and progress toward key milestones to the contractor's timely and complete delivery of required documentation. The team will treat documentation delays as contract performance issues and address them through appropriate performance actions through Procurement, while also notifying COSI leadership. The team will continue tracking schedule performance, deliverables, and outstanding deficiencies to support earlier intervention and enforcement and ensure issues identified are escalated.

Accountable Organization(s): Office of Communications and Signaling and Procurement

The estimated completion date for this action is: Closure of the 700MHz Radio Project contract, currently forecasted as December 31, 2027.

OIG Comment

OIG considers management's comments to be responsive to the recommendation and the corrective actions taken should resolve the issue identified in the report. OIG will follow up on the planned actions during the corrective action phase.

2. WMATA senior management should coordinate with the Radio Project team and legal counsel to consider contractual remedies in the event of continued contractor performance issues under the Radio Contract.

Management Response

COSI leadership concurs with the recommendation and will coordinate with the Radio Project team, Procurement, and Legal, to assess and pursue contractual remedies when contractor performance remains deficient. The project team will establish a formal escalation process for missed milestones, unsupported TIAs, unresolved non-conformance issues, and delayed deliverables. As warranted, the project team and COSI leadership will collaborate with Procurement to issue performance notifications or cure notices.

The Radio Project team and COSI leadership will collaborate with Procurement and Legal to evaluate and enforce liquidated damages, consistent with contract terms, for contractor-caused delays. The project team will continue to document the basis for delay attribution and work with COSI leadership and Procurement to apply available financial remedies to hold the contractor accountable for missed deadlines. In coordination with Procurement and Legal and in consult with Infrastructure, COSI leadership will assess whether contractor performance warrants termination for default or performance bond action and will remain prepared to pursue additional contractual remedies if performance does not improve. COSI leadership also will conduct joint reviews with the project team, Procurement, and Legal to ensure enforcement decisions are well supported, timely, and consistent with contractual requirements.

Accountable Organization(s): Office of Communications and Signaling, Procurement, and Infrastructure

The estimated completion date for this action is: Substantial Completion of the 700MHz Radio Project, currently forecasted to be completed by May 11, 2027.

OIG Comment

OIG considers management's comments to be responsive to the recommendation and the corrective actions taken should resolve the issue identified in the report. OIG will follow up on the planned actions during the corrective action phase.

Finding 2: WMATA Cannot Ensure Fair and Reasonable Pricing on Radio Contractor Change Order Proposals

During this evaluation, both WMATA and the contractor acknowledged that delays in the Radio project were due, in part, to prolonged negotiations on proposed change orders and requests for equitable adjustment. While some change order negotiation issues involved discussions about Radio Project design and scope, negotiations often focused on the supporting documentation for costs and pricing. The Radio Contract has had over 100 modifications and has nearly doubled in value since the award. As such, WMATA's ability to verify the fairness of pricing for change orders is critical to controlling costs under the contract. WMATA cannot ensure that pricing for change orders and requests for equitable adjustment under the Radio Contract is fair and reasonable if the contractor does not provide sufficient cost and pricing support.

Change Order Negotiation Issues

WMATA's position is that the change orders and requests for equitable adjustment submitted by the contractor lack sufficient cost and pricing support. For example, in 2021, the contractor submitted a change order for work at the Dulles Rail Yard. After six months of unsuccessful negotiations, WMATA requested OIG conduct a fair and reasonable pricing review of the change order. WMATA noted that despite multiple meetings, the contractor did not provide supporting documentation for their proposal of \$439,577.13. This proposal far exceeded WMATA's Independent Cost Estimate of \$173,150.65. As part of the fair and reasonable pricing review, OIG requested supporting documentation for the proposed costs. In an August 2022 report, OIG determined the contractor did not provide sufficient information for OIG to conduct a price reasonableness review of the proposed costs.

In another instance in 2024, a change order for site excavation work at the Shady Grove tower site took nearly one year to negotiate due to a lack of cost and pricing support provided by the contractor, despite WMATA's repeated requests. In this instance, the contractor briefly stopped work on site excavation during negotiations. WMATA settled the change order nearly one year after the contractor's initial proposal based on the contractor's incomplete proposal and actual costs to date. Although a significant savings - the settlement was nearly \$300,000 less than the contractor's final proposal of about \$1 million - the negotiation-related delays and lack of up-front support for the costs to WMATA remain problematic. Price support problems recurred;

according to the project manager, there were other instances where the contractor stopped work while it negotiated change orders with WMATA.

Contract Terms on Certified Cost and Pricing Data

The Radio Contract seeks to ensure cost reasonableness by requiring the contractor to provide certified cost and pricing data - factual, verifiable information about a contractor's proposed costs (including labor, materials, overhead) that is deemed accurate, complete, and current as of the date of the price agreement. Section 700-46 of the original Radio Contract (signed December 23, 2016) states:

The Design-Builder shall provide a Certificate of Current Cost or Pricing Data ... in support of any negotiated contract expected to exceed \$100,000 or any modification ... to exceed \$100,000.

Although the contract requires that certified cost or pricing data must be included with any contract proposal over \$100,000, it also outlines exceptions to this requirement. Section 01250-5 states:

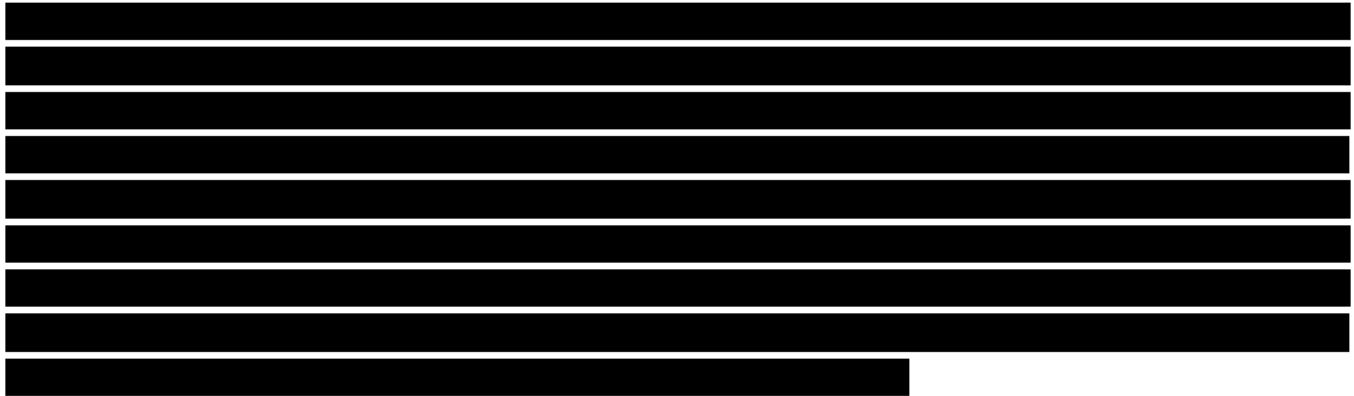
The submittal of certified cost or pricing data will not be required if the price is based on adequate price competition, established catalog or market prices of commercial items sold in substantial quantities to the general public, or prices set by law or regulation.

Prior to the execution of the Radio Contract in December 2016, WMATA and the contractor agreed to revisions that added a clause to several sections of the Radio Contract, including Section 700-46, that mirrored Section 01250-5:

The Parties agree justification of price reasonableness of proposals to include change orders and modifications, will be based on a catalog or market price of a commercial product sold in substantial quantities to the general public or based on prices set by law or regulation and are subject to price reasonableness audit by the WMATA Office of Inspector General.

The contract language was "revised to include" the new paragraph along with the original language. The contract revisions did not eliminate the original language in Section 700-46

(requiring that the contractor provide certified cost or pricing data). Ultimately, the contract specifies that WMATA will determine whether an exception applies.



The revised contract language has led to disagreements between WMATA and the contractor as to what supporting documentation the contractor is required to provide to support change orders and requests for equitable adjustment. WMATA has sought thorough documentation to establish price reasonableness. The contractor maintains that they are not a Cost Accounting Standards-compliant organization and that their accounting system cannot produce certified cost or pricing data.¹¹ Regardless, the revised clause specifically identifies methods by which price reasonableness can be established other than certified cost and pricing data. Thus, even under the revised clause, the contractor must still provide adequate support for a price reasonableness review.

Recommendations

OIG recommends the GM/CEO:

3. Ensure that the contractor complies with the agreed-upon provisions of the contract by providing adequate documentation to support price reasonableness in lieu of certified cost and pricing data.

¹¹ In each change order under the Radio Contract, the contractor has added a disclaimer that its pricing information does not constitute certified cost or pricing data, and has advised WMATA that it does so on advice of counsel.

Management Response

The Radio Project team concurs with the recommendation and will continue strict enforcement of contract requirements to ensure the contractor provides adequate documentation to support price reasonableness.

The project team will continue to require the contractor to submit complete, verifiable, and supportable cost and pricing documentation for all change orders and requests for equitable adjustment, regardless of the pricing method used. When the contractor asserts that certified cost or pricing data is not applicable, the project team and Procurement will require the contractor to submit alternative documentation sufficient to establish price reasonableness, including detailed cost breakdowns, supporting invoices, labor and material data, and market or catalog pricing where applicable. The project team and Procurement will reject proposals that do not include adequate support and will not progress negotiations until the contractor provides sufficient documentation to enable a proper cost analysis.

The project team and Procurement will continue to enforce contract documentation requirements and communicate clear expectations to the contractor regarding the level of detail required to support proposed pricing. The project team, working with Procurement, will continue to establish defined timelines for contractor submission as defined in each C35-B and will track compliance to ensure timely resolution of change orders and prevent extended negotiation periods. Issues with contractor compliance will be escalated to COSI leadership. These actions align with internal control expectations, including documentation and verification procedures, to effectively mitigate financial and procurement risks.

Accountable Organization(s): Office of Communications and Signaling and Procurement

The estimated completion date for this action is: Substantial Completion of the 700MHz Radio Project, currently forecasted to be completed by May 11, 2027.

OIG Comment

OIG considers management's comments to be responsive to the recommendation and the corrective actions taken should resolve the issue identified in the report. OIG will follow up on the planned actions during the corrective action phase.

4. Require contracts and contract modifications exceeding established thresholds to include pricing provisions that provide WMATA with sufficient cost or pricing information to independently determine that proposed prices are fair and reasonable.

Management Response

Procurement concurs with the recommendation. Procurement will conduct a comprehensive review of existing procurement policies, procedures, standard solicitation and contract provisions, and contract modification practices to assess whether enhancements are needed to ensure WMATA obtains sufficient cost or pricing information to support independent determinations that proposed prices are fair and reasonable for contracts and contract modifications exceeding applicable thresholds.

As part of this review, Procurement will evaluate current requirements, controls, guidance, and documentation standards related to price analysis and cost or pricing information. The review will consider whether existing procurement instruments and processes provide adequate support for evaluating proposed pricing and identifying opportunities to strengthen consistency, transparency, and documentation requirements.

Based on the results of this assessment, Procurement will develop and implement an action plan, as warranted, in accordance with WMATA's established procurement governance and approval processes. Procurement will coordinate with project teams and other stakeholders, as appropriate, to ensure any recommended enhancements effectively support WMATA's ability to evaluate pricing and maintain compliance with applicable procurement requirements.

Accountable Organization(s): Procurement and Office of Communications and Signaling

The estimated completion date for this action is: January 31, 2027.

OIG Comment

OIG considers management's comments to be responsive to the recommendation and the corrective actions taken should resolve the issue identified in the report. OIG will follow up on the planned actions during the corrective action phase.

Scope

The evaluation scope included a review of WMATA's Radio and Cellular Infrastructure Replacement Project, with a focus on WMATA's project management and a comparison of the Radio Project's progress against milestones reestablished in September 2023. While the evaluation did involve a review of the Radio Project from its beginning in 2016, the evaluation aimed to provide a current look at WMATA's management and oversight with a focus on FY 2026.

Methodology

To achieve the evaluation objectives, OIG's methodology was as follows:

- Researched background information about the Radio and Cellular Infrastructure Replacement Project, including Capital Improvement Program documents, management presentations, and WMATA web postings.
- Reviewed prior audits, studies, and inspections related to WMATA's radio system prepared by the Washington Metrorail Safety Commission, the Federal Transit Authority, and the Metropolitan Washington Council of Governments.
- Reviewed WMATA Policy Instructions, the Metro Operating Rulebook, and the Metro Emergency Operations Plan for requirements on the use of WMATA's radio system.
- Performed interviews and follow-up discussions with WMATA and contractor personnel to gain an understanding of the Radio Project.
- Reviewed contract file documentation in the Procore system for both the Radio Contract and the fiber contract.
- Reviewed Radio Project schedules prepared by WMATA and contractors to monitor progress against contractual milestones.

Principles and Standards for Offices of Inspector General (Green Book) Statement

The evaluation was conducted in accordance with the Principles and Standards for Offices of Inspector General, dated July 2024, approved by the Association of Inspectors General.

In November 2021, Congress and the president enacted IIJA. Section 30019(d)(2)(E)(iii) of IIJA requires WMATA OIG to issue a report, two years and five years after the enactment of the IIJA, that includes, among other things, an assessment of the effective use of funding to address major capital improvement projects. The funds used for the Radio and Cellular Infrastructure Replacement Project are part of OIG's assessment of the effective use of funding to address major capital improvement projects.

The Radio Project is funded through a combination of federal funds, debt (dedicated revenue bonds),¹² dedicated funding,¹³ system performance funds,¹⁴ and contributions from a cellular consortium (see Table 4).

Table 4: Federal Funding for the Radio Project

Federal (includes local match)					
Grant / Source Number	Description	Federal Share	Federal Billed to Date	Local Share	Local Share Utilized to Date
DC-75-0006	FY2015 PRIIA Appropriation	\$519,182	\$519,182	\$519,182	\$519,182
DC-2016-010	FFY2016 PRIIA Appropriation	\$6,833,497	\$6,833,497	\$6,833,497	\$6,833,497
DC-2017-006	FFY17 PRIIA Appropriation	\$44,686,797	\$44,686,797	\$44,686,797	\$44,686,797
DC-2018-007	FFY2018 PRIIA Appropriation	\$26,003,423	\$26,003,423	\$26,003,423	\$26,003,423
DC-2019-006	FFY2019 PRIIA Appropriation	\$3,409,780	\$3,409,780	\$3,409,780	\$3,409,780
DC-2019-009	FFY2019 5337 State of Good Repair	\$35,999,794	\$35,999,794	\$8,999,949	\$8,999,949
DC-2020-016	FFY2020 H.R. 1865 RSI (Section 75) Funding (ex PRIIA)	\$23,427,388	\$23,427,388	\$23,427,388	\$23,427,388
DC-2021-017	FFY2021 PRIIA	\$2,252,984	\$2,252,984	\$2,252,984	\$2,252,984
DC-2022-018	FFY22 PRIIA ELES, Fire Sys, Platforms, ATC, Radio, Water Mit	\$3,434,086	\$3,434,077	\$3,434,086	\$3,434,077
Sub-total Federal (includes local match)		\$146,566,931	\$146,566,922	\$119,567,086	\$119,567,077

¹² Dedicated revenue bonds are paid down by jurisdictional dedicated funds.

¹³ Funds received through DC, MD, and VA.

¹⁴ System performance is a different type of non-federal funding provided by the jurisdictions via the Capital Funding Agreement (CFA).

Table 5: Debt Funding for the Radio Project

Debt					
Grant / Source Number	Description	Federal Share	Federal Billed to Date	Local Share	Local Share Utilized to Date
DEBT-SERIES2020	Debt Issuance - 2020A			\$11,273,550	\$11,895,565
DEBT-SERIES2021	Debt Issuance - 2021A			\$7,466,755	\$7,466,755
DEBT-SERIES2023	Debt Issuance - 2023A			\$1,840,559	\$1,840,559
DEBT-SERIES_23B	Debt Issuance - 2023B			\$26,404,088	\$26,404,088
DEBT-SERIES_24A	Debt Issuance - 2024A			\$22,549,335	\$22,549,335
DEBT-SERIES_25A	Debt Issuance - 2025A			\$25,699,039	\$14,657,735
Sub-total Debt				\$95,233,326	\$84,814,037

Table 6: Dedicated Funding for the Radio Project

Dedicated Funding					
Grant / Source Number	Description	Federal Share	Federal Billed to Date	Local Share	Local Share Utilized to Date
VA-DEDIC-2019	FY2019 Dedicated Funding (VA only)			\$499,536	\$499,536
DEDICATED-2020	FY2020 Dedicated Funding			\$1,062,581	\$1,062,581
DEDICATED-2021	FY2021 Dedicated Funding			\$1,750,885	\$1,750,885
DEDICATED-2022	FY2022 Dedicated Funding			\$5,708,818	\$5,708,818
DEDICATED-2023	FY2023 Dedicated Funding			\$23,888,199	\$23,888,199
DEDICATED-2024	FY2024 Dedicated Funding			\$11,528,578	\$11,528,578
DEDICATED-2025	FY2025 Dedicated Funding			\$22,671,281	\$22,671,281
DEDICATED-2026	FY2026 Dedicated Funding			\$584,092	\$376,089
Sub-total Dedicated Funding				\$67,693,969	\$67,485,967

Table 7: System Performance Funding for the Radio Project

System Performance					
Grant / Source Number	Description	Federal Share	Federal Billed to Date	Local Share	Local Share Utilized to Date
System Performance - 2018	FY2018 System Performance			\$3,667,376	\$3,667,376
System Performance - 2020	FY2020 System Performance			\$3,563	\$3,563
System Performance - 2021	FY2021 System Performance			\$485,363	\$485,363
System Performance - 2022	FY2022 System Performance			\$8,335,488	\$8,335,488
System Performance - 2023	FY2023 System Performance			\$516,086	\$516,086
System Performance - 2025	FY2025 System Performance			\$3,626,458	\$3,626,458

**Sub-total System
Performance**

\$16,634,335 \$16,634,335

Table 8: Cellular Consortium Funding for the Radio Project

Other					
Grant / Source Number	Description	Federal Share	Federal Billed to Date	Local Share	Local Share Utilized to Date
CELLULAR	Cellular Consortium Funds			\$24,511,714	\$24,511,714



M E M O R A N D U M

SUBJECT: Evaluation of WMATA's Radio and Cellular Infrastructure Replacement Project DATE: July 17, 2026

FROM: Executive Vice President and Chief Financial Officer – David Rickard

Nathan Tash

Digitally signed by Nathan Tash
Date: 2026.07.17
08:53:44 -04'00'

Executive Vice President and Chief Infrastructure Officer – Theresa Impastato

Theresa M Impastato

Digitally signed by Theresa M Impastato
Date: 2026.07.17
11:11:08 -04'00'

TO: OIG – Michelle Zamarin

WMATA management has carefully reviewed the Office of Inspector General's (OIG) June 29, 2026, *Evaluation of WMATA's Radio and Cellular Infrastructure Replacement Project*. At the exit conference, the OIG indicated that it had no immediate, specific recommendations beyond the corrective measures the project team had already taken or was implementing. Accordingly, WMATA provides the following responses to the report's findings and recommendations.

Finding 1 - Despite WMATA's Efforts to Prioritize the Radio Project, the Project Continues to Experience Delays and is Significantly Behind Schedule

Recommendation 1: Enforce and enhance contract management controls, including structured schedule monitoring, documented performance reviews, and timely corrective actions, to ensure the radio contractor meets requirements and milestone deadlines

Response: The Department of Communication and Signaling (COSI) Radio Project team concurs with the recommendation and will continue to practice strong contract management controls to maintain contractor accountability, including contract performance and schedule adherence. The project team, working with Procurement, will continue to require complete, supportable, and contract-compliant Time Impact Analyses for all claimed delays, reject deficient submissions, require prompt resubmission, and deny schedule extensions that lack adequate support. The project team, with Procurement's support, will continue to conduct routine contractor performance reviews to evaluate milestone adherence, responsiveness to deficiencies, and compliance with contract requirements. These reviews will document recurring issues, including unresolved generator defects, open non-conformance reports for Bi-Directional Amplifiers, and incomplete or late submittals needed for approvals.

The team will continue to require corrective action plans for all material deficiencies. Each plan will identify the root cause, define corrective actions, and establish firm completion dates. The team will continue to track progress and escalate matters up to senior management and Procurement when the contractor does not demonstrate timely improvement. The team will continue to enforce submittal requirements by tying work

Washington
Metropolitan Area
Transit Authority

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acceptance and progress toward key milestones to the contractor's timely and complete delivery of required documentation. The team will treat documentation delays as contract performance issues and address them through appropriate performance actions through Procurement, while also notifying COSI leadership.

The team will continue tracking schedule performance, deliverables, and outstanding deficiencies to support earlier intervention and enforcement and ensure issues identified are escalated.

Accountable Organization(s): Office of Communications and Signaling and Procurement

The estimated completion date for this action is: Closure of the 700MHz Radio Project contract, currently forecasted as December 31, 2027.]

Recommendation 2: WMATA senior management should coordinate with the Radio Project team and legal counsel to consider contractual remedies in the event of continued contractor performance issues under the Radio Contract.

Response: COSI leadership concurs with the recommendation and will coordinate with the Radio Project team, Procurement, and Legal, to assess and pursue contractual remedies when contractor performance remains deficient. The project team will establish a formal escalation process for missed milestones, unsupported TIAs, unresolved non-conformance issues, and delayed deliverables. As warranted, the project team and COSI leadership will collaborate with Procurement to issue performance notifications or cure notices.

The Radio Project team and COSI leadership will collaborate with Procurement and Legal to evaluate and enforce liquidated damages, consistent with contract terms, for contractor-caused delays. The project team will continue to document the basis for delay attribution and work with COSI leadership and Procurement to apply available financial remedies to hold the contractor accountable for missed deadlines. In coordination with Procurement and Legal and in consult with Infrastructure, COSI leadership will assess whether contractor performance warrants termination for default or performance bond action and will remain prepared to pursue additional contractual remedies if performance does not improve. COSI leadership also will conduct joint reviews with the project team, Procurement, and Legal to ensure enforcement decisions are well supported, timely, and consistent with contractual requirements.

Accountable Organization(s): Office of Communications and Signaling, Procurement, and Infrastructure

The estimated completion date for this action is: Substantial Completion of

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Page 3

the 700MHz Radio Project, currently forecasted to be completed by May 11, 2027.

Finding 2 - WMATA Cannot Ensure Fair and Reasonable Pricing on Radio Contractor Change Order Proposals

Recommendation 3: Ensure that the contractor complies with the agreed-upon provisions of the contract by providing adequate documentation to support price reasonableness in lieu of certified cost and pricing data.

Response: The Radio Project team concurs with the recommendation and will continue strict enforcement of contract requirements to ensure the contractor provides adequate documentation to support price reasonableness.

The project team will continue to require the contractor to submit complete, verifiable, and supportable cost and pricing documentation for all change orders and requests for equitable adjustment, regardless of the pricing method used. When the contractor asserts that certified cost or pricing data is not applicable, the project team and Procurement will require the contractor to submit alternative documentation sufficient to establish price reasonableness, including detailed cost breakdowns, supporting invoices, labor and material data, and market or catalog pricing where applicable. The project team and Procurement will reject proposals that do not include adequate support and will not progress negotiations until the contractor provides sufficient documentation to enable a proper cost analysis.

The project team and Procurement will continue to enforce contract documentation requirements and communicate clear expectations to the contractor regarding the level of detail required to support proposed pricing. The project team, working with Procurement, will continue to establish defined timelines for contractor submission as defined in each C35-B and will track compliance to ensure timely resolution of change orders and prevent extended negotiation periods. Issues with contractor compliance will be escalated to COSI leadership.

These actions align with internal control expectations, including documentation and verification procedures, to effectively mitigate financial and procurement risks.

Accountable Organization(s): Office of Communications and Signaling and Procurement

The estimated completion date for this action is: Substantial Completion of the 700MHz Radio Project, currently forecasted to be completed by May 11, 2027.

Recommendation 4: Require contracts and contract modifications exceeding established thresholds to include pricing provisions that provide WMATA with sufficient cost or pricing information to independently determine that proposed prices are fair and reasonable.

Response: Procurement concurs with the recommendation. Procurement will conduct a comprehensive review of existing procurement policies, procedures, standard solicitation

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and contract provisions, and contract modification practices to assess whether enhancements are needed to ensure WMATA obtains sufficient cost or pricing information to support independent determinations that proposed prices are fair and reasonable for contracts and contract modifications exceeding applicable thresholds.

As part of this review, Procurement will evaluate current requirements, controls, guidance, and documentation standards related to price analysis and cost or pricing information. The review will consider whether existing procurement instruments and processes provide adequate support for evaluating proposed pricing and identifying opportunities to strengthen consistency, transparency, and documentation requirements.

Based on the results of this assessment, Procurement will develop and implement an action plan, as warranted, in accordance with WMATA's established procurement governance and approval processes. Procurement will coordinate with project teams and other stakeholders, as appropriate, to ensure any recommended enhancements effectively support WMATA's ability to evaluate pricing and maintain compliance with applicable procurement requirements.

Accountable Organization(s): Procurement and Office of Communications and Signaling

The estimated completion date for this action is: January 31, 2027.

cc: Senior Executive Team
SVP & Chief Risk and Audit Officer – Elizabeth Sullivan

To Report Fraud, Waste, or Abuse

Please Contact:

Email: hotline@wmataoig.gov
Website: wmataoig.gov/hotline-form/
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