

Broadband Reporting Obligations and Performance Testing FAQ

As of December 9, 2019

The FCC has adopted rules requiring all ETCs that receive CAF support for broadband deployment to fixed locations and have buildout requirements to report geo-coded location information about where broadband service is offered to USAC's HUBB portal. The FCC has also adopted requirements for recipients of CAF high-cost support to conduct speed and latency performance testing and submit testing results as part of their annual compliance certification. Because performance testing is directly linked to the locations and speeds reported to the USAC HUBB, these issues are intertwined.

The questions below came from participants in various national NECA training sessions. NECA has attempted to provide guidance on these questions based on the most currently available information. However, NECA's observations and guidance are subject to further interpretation and clarification by the FCC and/or USAC.

1. Question: Are CAF BLS recipients who did not have mandatory deployment obligations, i.e., those that could provide 10/1 Mbps to 80% of their locations in 2016, exempt from broadband reporting and performance testing requirements?

Answer: No.

The 2016 Rate-of-Return Reform Order did not set mandatory deployment obligations for those carriers that had deployed broadband of 10/1 Mbps to 80% or more of their study areas, as determined by FCC Form 477. Rather, the Commission stated that it would monitor the deployment progress of legacy carriers without defined buildout obligations and could "revisit this framework in the future if such carriers do not continue to make reasonable progress on extending broadband."

The December 2018 USF Reform Order, however, determined that all CAF BLS recipients should be subject to deployment obligations. The FCC stated that although those carriers with 80% or greater deployment of 10/1 Mbps have in many cases reported additional deployment, it was unable to evaluate their progress without an understanding of how this new deployment relates to the mandatory obligations set for other carriers. Paragraph 112 of the December 2018 Order further states: "Because all legacy carriers will have defined deployment obligations, all CAF BLS recipients will now be required to report their locations deployed in the HUBB portal and will be subject to performance testing requirements." The new reporting requirements went into effect November 14, 2019.

Note: The Commission also reset the five-year deployment term for CAF BLS recipients and revised the minimum speed obligation to 25/3 Mbps, up from 10/1 Mbps.

2. If our company was exempt from reporting when subject to previous CAF BLS rules, and now has obligations under the December 2018 USF Reform Order, when must we begin HUBB portal reporting and performance testing?

Answer: Previously exempt CAF BLS carriers must report locations to the HUBB by March 1, 2020, as the rule went into effect on November 14, 2019. All HUBB reporting must abide by the below schedule:

All information subject to further modification pending FCC clarifications.

NECA Proprietary

Carrier Type	First Filing Deadline, Annually Thereafter
A-CAM I recipients	March 1, 2017; March 1, 2019 for deployments made prior to January 1, 2016
CAF-BLS carriers with defined deployment obligations	March 1, 2017 for deployments made between May 25, 2016 and December 31, 2016. March 1, 2018 for new locations
CAF Phase II recipients	March 1, 2017
Alaska Plan carriers	March 1, 2018
CAF Phase II Auction winners	First July 1 after receiving support
ACS	March 1, 2017
RBE winners	March 1, 2018
Remaining CAF-BLS Carriers	March 1, 2020
A-CAM II recipients	March 1, 2020

For network performance testing, in its October 2019 Performance Measures Testing Order on Reconsideration, the Commission established a pre-testing period and delayed the beginning of the network performance measures testing. Results of the pre-testing must be submitted to USAC within one week of the end of each quarter. The below chart provides testing dates for all programs:

Program	Pre-testing start date	Testing start date
CAF Phase II	January 1, 2020	July 1, 2020
RBE	January 1, 2021	January 1, 2022
Alaska Plan	January 1, 2021	January 1, 2022
A-CAM I	January 1, 2021	January 1, 2022
A-CAM I Revised	January 1, 2021	January 1, 2022
ACAM II	January 1, 2022	January 1, 2023
Legacy ROR (CAF BLS)	January 1, 2022	January 1, 2023
CAF II Auction	January 1, 2022	January 1, 2023
New NY Broadband Program	January 1, 2022	January 1, 2023

3. Since the conversion to 25/3 Mbps for CAF BLS recipients has not actually taken place, won't 10/1 Mbps be the required tier for initial testing?

Answer: No.

The deployment requirements for CAF BLS have changed and the rules went into effect March 21, 2019. Section 54.308 specifies deployment speed obligations based on the type of high-cost support a carrier receives.

All information subject to further modification pending FCC clarifications.

NECA Proprietary

For CAF BLS recipients, section 54.308(a)(2)(i) indicates “Each rate-of-return carrier is required to target a defined percentage of its five-year forecasted CAF BLS support to the deployment of broadband service to locations that are unserved with 25 Mbps downstream/3 Mbps upstream broadband service” according to a formula. The effective date of the December 2018 Order was March 21, 2019.

CAF BLS recipients will be required to meet their deployment obligations by providing service of at least 25/3 Mbps in the HUBB. Those locations will be subject to testing to ensure they meet or exceed the 25/3 Mbps and 100 ms latency standard. Locations in speed tiers higher than 25/3 Mbps will still be tested to the 25/3 Mbps standard.

4. Do companies that have completed their FTTH buildout have testing responsibility?

Answer: Yes.

All companies receiving high-cost CAF support with buildout requirements have testing requirements.

5. If our company has fewer than 500 subscribers in a state, do we have to test?

Answer: Yes.

The FCC requires carriers test up to 50 locations per CAF-required service tier offering per state, depending on the number of subscribers a carrier has in that state. The subscribers eligible for testing must be at locations that are reported in the HUBB where there is an active subscriber. Carriers with fewer than 50 subscribers per CAF required speed tier per state must test a minimum of five subscribers. The October 2019 Reconsideration Order declined to amend this requirement but indicated any noncompliant carrier testing fewer than five CAF-supported subscriber locations because more are not available would be subject to verification that more customers are not available.

The July 6, 2018 Performance Measures Testing Order (Performance Measures Order) provided the following examples to illustrate how this scaled approach should be implemented (paragraph 39):

- A carrier with 2,300 customers subscribed to a single service tier of 10/1 Mbps in one state must test 50 locations in that state, while a carrier providing solely 25/3 Mbps service to over 2,500 subscribers in each of three states must test 50 locations in each state.
- A carrier providing 10/1 Mbps service and 25/3 Mbps service to 100 subscribers each in a single state must test 10 locations for each of the two service tiers—20 locations in total.
- A carrier providing solely 10/1 Mbps service to 30 subscribers must test five locations, and if that carrier is only able to test three CAF-supported locations, that carrier must test two non-CAF-supported locations receiving 10/1 Mbps service in the same state.
- A carrier with 2,000 customers subscribed to 10/1 Mbps in one state through CAF Phase II funding and 500 RBE customers subscribed to 10/1 Mbps in the same state, and no other high-cost support

All information subject to further modification pending FCC clarifications.

NECA Proprietary

with deployment obligations, must test a total of 50 locations in that state for the 10/1 Mbps service tier.

6. Has the FCC developed any guidelines for randomly selecting subscribers for testing? How will USAC determine what locations have subscribers since that data has not been reported to the HUBB portal?

Answer: Yes, in a June 7, 2019 Federal Register notice.

While in the past, the HUBB portal has not collected information on which locations have subscribers, information provided in the Federal Register (Vol. 84, No. 110 / Friday, June 7, 2019) states that “carriers will identify, from among the locations they have already submitted and certified in USAC’s Hubb portal, the locations where they have an active subscriber. From those subscriber locations, USAC will then select a random sample from which the carrier will be required to perform testing for speed and latency. Carriers that do not provide location information in the HUBB portal will use a randomization tool provided by USAC to select a random sample of locations for testing.”

The carrier’s sample for each service tier (e.g., 25 Mbps/3 Mbps) will be regenerated every two years. During the two-year cycle, carriers will have the ability to add and remove subscriber locations if necessary - for example, as subscribership changes.

7. What do we do if a subscriber refuses access for a test box?

Answer: The FCC has not provided direct guidance for cases where the subscriber refuses to allow testing equipment to be installed in the home. The FCC’s July 2018 Performance Measures Order (paragraph 40) does state that carriers may use inducements to encourage subscribers to participate in testing. However, to ensure that the selection remains random, carriers must offer the same inducement to all randomly selected subscribers in the areas for which participating subscribers are required for the carrier to conduct testing. Additionally, in FN 125 of its October 2019 Order on Reconsideration, the Commission noted that in the event customers refuse consent, it is “working with USAC to implement the random selection process and will ensure that carriers will be able to obtain additional randomly selected subscribers as needed.”

8. How quickly do you need to replace a test subject if one of your current test subjects disconnects?

Answer: Paragraph 40 of the FCC’s July 2018 Performance Measures Order requires any sample location lacking an active subscriber 12 months after that location was selected to be replaced by an actively subscribed location, randomly selected. The FCC has not specified how quickly a replacement must be found.

9. Won't the requirement that speed tests be run at the beginning of the hour cause very high load on the IXP’s network?

Answer: The Commission has denied requests for reconsideration of this point.

All information subject to further modification pending FCC clarifications.

NECA Proprietary

The Commission did address testing during peak periods, but only to the extent that it impacts an individual carriers' network. Paragraph 32 of the July 2018 Performance Measures Order states:

. . . [W]e disagree with assertions that requiring speed testing during the peak period will introduce problematic network congestion over the provider's core network. Based on MBA speed test data, a download service speed test for 10 Mbps requires approximately 624 MB combined downloaded data for 50 locations per hour. This is less traffic than what would be generated by streaming a little less than one-half of a high-definition movie. A download service speed test for 25 Mbps requires approximately 1,841 MB combined downloaded data for 50 locations, which is about the same amount of traffic as a little less than two high- definition movies. The small amount of data should have no noticeable effect on network congestion. Upload test data-usage is even lower. . . .

To the extent that a carrier is concerned about possible impacts on the consumer experience, we permit carriers the flexibility to choose whether to stagger their tests, so long as they do not violate any other testing requirements, as we explain in our discussion of the testing intervals below. The Commission, however did not address impacts on the IXP's network.

And in the October 2019 Reconsideration Order, the Commission said:

the small amount of data required for speed testing will have no noticeable effect on network congestion. We remind carriers that we provide them the flexibility to choose whether to stagger their tests over the course of the testing period, so long as they do not violate any other testing requirements.

10. What methods are available to determine if a customer is using 64 kbps of data (crosstalk) to suspend a test?

Answer: Most network monitoring systems measure data speed in both directions and measure quantity of data. The network monitoring systems are traditionally integrated with network testing systems. These systems can be setup to sound an alert to the network manager if thresholds are exceeded.

11. If you have tiers of 1 Gbps, do you have to test 1 Gbps or the supported 25/3 Mbps?

Answer: Carriers are only required to test to the CAF-supported speed. Thus, a carrier receiving CAF BLS is only required to test its locations to the 25/3 Mbps speed limitation, even if the location is served by 1 Gbps service.

12. If during a testing window, a customer or company is subject to a natural disaster, are they out of compliance?

Answer: The FCC has indicated it will consider any network failure when it analyzes testing results. Paragraph 145 of the July 2018 Performance Measures Order states:

All information subject to further modification pending FCC clarifications.

NECA Proprietary

If a carrier knows or suspects that the testing infrastructure has failed or has negatively impacted test results, the carrier may submit evidence of the test infrastructure failure with sufficiently detailed information for the Commission to understand its cause and determine the extent to which any test results should be discarded or adjusted when calculating compliance.

The FCC did not clarify whether a natural disaster effect on a Telco's network would be considered a network failure.

13. Do you have to test all advertised speeds or just speeds associated with buildout obligations and milestones?

Answer: Test to CAF-required speed tiers per a carrier's buildout requirements.

In its July 2018 Performance Measures Order, the FCC required that "carriers test up to 50 locations per CAF-required service tier offering per state, depending on the number of subscribers a carrier has in a state." This statement, along with examples provided in that order, suggest the number of tested locations depends on buildout requirement speeds. As such, speed tiers above buildout requirements may be tested and included as results for lower speed CAF-required tiers, but there is no separate requirement to test a predetermined number of subscriber locations for higher than CAF-required speed tiers. Carriers only need to test to the mandated minimum speed even if higher speeds have been deployed.

14. Do unsubsidized competitors have to meet the same testing requirements as CAF High Cost Support recipients?

Answer: No. Testing is only required for recipients of CAF High Cost support.

15. If we are A-CAM II, are we only required to test customers built out to 25/3 Mbps?

Answer: No. A-CAM II companies have both 25/3 and 4/1 Mbps deployment obligations. A July

12, 2019 public notice clarifying A-CAM I and II deployment obligations stated:

For A-CAM II recipients, each carrier has an obligation to deploy at least 25/3 Mbps service to a number of eligible locations equal to the number of fully funded locations, and at least 4/1 Mbps to a number of locations equal to the specified percentage of capped locations.

16. Who owns the IXP locations?

Answer: IXP locations are owned by numerous private and publicly traded companies.

17. Is testing required for both cost and average schedule companies who receive CAF BLS?

All information subject to further modification pending FCC clarifications.

NECA Proprietary

Answer: Yes. Testing is required for all carriers receiving high cost CAF support with FCC mandated buildout requirements.

18. Are we required to start testing on July 1 or by the end of the 3rd quarter?

Answer: Neither. In its October 2019 Performance Measures Testing Reconsideration Order, the Commission established a pre-testing period and delayed the beginning of the actual testing period. The below chart provides testing dates for all programs:

Program	Pre-testing start date	Testing start date
CAF Phase II	January 1, 2020	July 1, 2020
RBE	January 1, 2021	January 1, 2022
Alaska Plan	January 1, 2021	January 1, 2022
A-CAM I	January 1, 2021	January 1, 2022
A-CAM I Revised	January 1, 2021	January 1, 2022
ACAM II	January 1, 2022	January 1, 2023
Legacy ROR	January 1, 2022	January 1, 2023
CAF II Auction	January 1, 2022	January 1, 2023
New NY Broadband Program	January 1, 2022	January 1, 2023

19. What if the subscriber at a randomly selected location doesn't subscribe to the required test bandwidth?

Answer: In Paragraph 48 of its October 2019 Order on Reconsideration, the Commission indicated “carriers are not required to upgrade individual subscriber locations to conduct speed testing unless there are no other available subscriber locations at the CAF-required speeds within the same state or relevant service area.” However, the Commission suggested upgrades may still be necessary in certain situations and in that event “USAC will use its randomization procedures to determine which locations must be upgraded.”

20. Are the test requirement quantities based on the commercially offered speed tiers or the build out/milestone speed tiers?

Answer: They are based on the CAF-required service tier for each type of support.

Paragraph 36 of the July 2018 Performance Measures Order states that carriers are required to “...test up to 50 locations per CAF-required service tier offering per state, depending on the number of subscribers a carrier has in a state.” Higher speed tiers can count toward lower speed buildout requirements.

21. If crosstalk is present, does that mean the carrier **may** or **must** cancel the test? How often is crosstalk

All information subject to further modification pending FCC clarifications.

NECA Proprietary

measured? How is testing to be performed if the customer has constant crosstalk on the connection?

Answer: If crosstalk is present, the carrier **may** cancel the test, but still has requirements for the testing hour. Data measurements are performed on a per second basis. Paragraph 38 of the July 2018 Performance Measures Order states “If the consumer load is greater than 64 Kbps downstream for download tests or 32 Kbps upstream for upload tests, the provider may defer the affected download or upload test for one minute and reevaluate whether the consumer load exceeds the relevant 64 Kbps or 32 Kbps threshold before retrying the test.”

The Commission’s October 2019 Order on Reconsideration, in paragraph 26, clarifies what happens if there is crosstalk and how testing should be treated. Specifically, “[a] carrier that begins attempting speed tests within the first fifteen minutes of a testing hour, and repeatedly retries and defers the test at one-minute intervals due to consumer load meeting the adopted cross-talk thresholds (i.e., 64 Kbps for download tests or 32 Kbps for upload tests), may report that no test was successfully completed during the test hour because of cross-talk. A provider that does not attempt a speed test within the first 15 minutes of the hour and/or chooses to retry tests in greater than one-minute intervals must, however, conduct and report a successful speed test for the testing hour regardless of cross-talk.”

22. Our company has over a dozen speed tiers. All have fewer than 500 subscribers, and most have fewer than 50 subscribers. Some have only one to five customers. Must we test each tier?

Answer: Testing is required for each of your CAF-required speed tiers, which is based on your buildout obligations. The number of locations to be tested is based on the number of subscribers at CAF-supported locations per state and service tier combination.

Paragraph 36 of the July 2018 Performance Measures Order states that a carrier must “test up to 50 locations per **CAF-required service tier offering per state**, depending on the number of subscribers a carrier has in a state.”

To determine the number of test locations, a carrier counts subscriber locations at the required tier or faster, as reported in the HUBB portal. For a company with CAF required buildouts of 25/3 Mbps, it would add subscribers at locations reported to the HUBB portal at speed tiers 4 (25/3 Mbps) and above. For example, if a carrier has 100 subscriber locations at tier 4, 100 subscribers at tier 5, and 100 subscriber locations at tier 6, it would be required to test 30 subscriber locations.

In paragraph 36 of the July 2018 Performance Measures Order, the Commission adopted a scaled requirement for testing based on the number of subscribers at CAF-supported locations per state and service tier combination. For tiers with 50 or fewer subscribers, the required number of test locations is 5. For tiers with 51 to 500 subscribers, 10% of locations must be tested, and for tiers with over 500 subscribers, 50 locations must be tested.

The July 2018 Performance Measures Order also provided the following examples to illustrate how this scaled approach should be implemented (paragraph 39):

All information subject to further modification pending FCC clarifications.

NECA Proprietary

- A carrier with 2,300 customers subscribed to a single service tier of 10/1 Mbps in one state must test 50 locations in that state, while a carrier providing solely 25/3 Mbps service to over 2,500 subscribers in each of three states must test 50 locations in each state.
- A carrier providing 10/1 Mbps service and 25/3 Mbps service to 100 subscribers each in a single state must test 10 locations for each of the two service tiers—20 locations in total.
- A carrier providing solely 10/1 Mbps service to 30 subscribers must test five locations, and if that carrier is only able to test three CAF-supported locations, that carrier must test two non-CAF-supported locations receiving 10/1 Mbps service in the same state.
- A carrier with 2,000 customers subscribed to 10/1 Mbps in one state through CAF Phase II funding and 500 RBE customers subscribed to 10/1 Mbps in the same state, and no other high-cost support with deployment obligations, must test a total of 50 locations in that state for the 10/1 Mbps service tier.

23. With the minimum of five and maximum of 50, is the 10% requirement based upon the currently reported locations or overall funded locations?

Answer: The 10% requirement is based on the number of subscribers in a state and service tier.

Paragraph 38 of the July 2018 Performance Measures Order states that testing be based on the number of subscribers in a state and service tier, rather than the number of lines for which a provider is receiving support, to determine the required number of test locations.

24. What if a customer orders both a residential line and a business line out of the same home, is that counted as one location or two?

Answer: USAC's HUBB FAQ document states: "A carrier receives credit for and must report the house regardless of whether the house subscribes to the service. For a carrier to count a business run out of a house or a business run out of a barn, shed or other structure on the property, there must be separate facilities (drop/line) and separate equipment (e.g., modem) and the business must separately subscribe (get its own bill) to at least the minimum speed required. See DA-16- 1363 WCB Guidance on Location Reporting for Carriers Receiving CAF Support."

Northeast Iowa Telephone Company and Western Iowa Telephone Association have filed a petition for clarification or declaratory ruling on the definition of locations under the A-CAM for residences that also serve as businesses. The carriers have requested that the Commission address the discrepancies between its orders and guidance subsequently released by USAC regarding the eligibility of home-based businesses. They asked the Commission to clarify or issue a declaratory ruling that home-based businesses that are registered with a state or other governmental entity and are located in eligible census blocks are considered locations and do not require separate subscriptions or facilities to count as such.

25. Do we still receive ongoing 75% support dollars if we don't do any testing?

All information subject to further modification pending FCC clarifications.

NECA Proprietary

Answer: See paragraph 64 of the July 2018 Performance Measures Order. Companies that refuse to test may fall into non-compliance level 4 and may be subject to, at a minimum, quarterly reporting and a 25% withholding of support. The FCC will also refer level 4 carriers to USAC for an investigation into the extent to which the carrier has deployed broadband in accordance with its deployment obligations. The FCC may also take enforcement action, including financial forfeitures against such a company for failing to comply with its rules.

26. 6 p.m. to 12 a.m. includes our peak times. Any chance that this could be changed to some off-peak time?

Answer: No.

The FCC intentionally chose peak period usage for testing. In Paragraph 22 of the July 2018 Performance Measures Order, the FCC stated that “focusing on the peak usage period provides the most useful information because it demonstrates the performance users can expect when the Internet in their local area is experiencing highest demand from users.”

While the FCC did go on to say (paragraph 30) that it “intend[s] to revisit this requirement periodically to determine whether peak Internet usage times have changed substantially,” it seems unlikely it will change the testing period to non-peak usage hours.

27. Do we have to report tests conducted outside of the 6 p.m. to 12 a.m. window?

Answer: No.

The FCC does not address testing that takes place outside of its mandated testing window. Only tests that take place inside the testing window of 6 p.m. to 12 a.m. should be reported (Paragraph 30).

28. Are we required to tell the customer that the FCC chose them to be tested so they can't turn their modem off for the testing period?

Answer: No guidance has been provided relating to customer notification or situations where a subscriber turns off his/her modem during testing windows.

29. If we are currently on CAF BLS support and our required buildout is 10/1 Mbps, and we elect to take ACAM-II, how will that election impact our speed testing requirements?

Answer: First, CAF BLS buildout requirements were changed to 25/3 Mbps in the December 2018 Reform Order. Second, the election of A-CAM II changes the deployment obligations and will also affect the testing requirements. A July 12, 2019 public notice clarifying A-CAM I and II deployment obligations stated:

For A-CAM II recipients, each carrier has an obligation to deploy at least 25/3 Mbps service to a

All information subject to further modification pending FCC clarifications.

NECA Proprietary

number of eligible locations equal to the number of fully funded locations, and at least 4/1 Mbps to a number of locations equal to the specified percentage of capped locations.

30. How/when will we receive the list of random locations?

Answer: USAC will provide the list or will provide a tool for randomly selecting subscriber locations where location data has not been reported to the HUBB. The timing of the distribution of this information has not yet been announced.

31. If a customer subscribes to an 18 Mbps/3 Mbps speed service, do we test at that speed, or do we ratchet the customer's speed to test at 10/1 Mbps? Probably a bigger question is for customers that have speeds greater than 100 Mbps, if we had to test at 25/3 Mbps.

Answer: Paragraph 51 of the July 2018 Performance Measures Order indicates carriers are required "to meet and test to their CAF obligation speed(s) regardless of whether their subscribers purchase Internet service offerings with advertised speeds matching the CAF-required speeds at CAF-eligible locations.

Speed tests are performed at the speed tiers reported in the HUBB for each location. Speed tiers are based on the maximum speed offered at a location. The location tier must be at or above both down and up speeds. For example: a location with a maximum speed capability of 10/3 Mbps would be reported at a maximum of tier 3 (10/1 Mbps). A location with a maximum speed of 50/10 Mbps would be reported at a maximum of tier 5 (25/5 Mbps). Speed tiers are listed on USAC's website.

If a customer location is capable of 100/50 Mbps, you would list that location in the HUBB Portal at tier 7 (100/25 Mbps) and you would test that location to meet or exceed 100/25 Mbps. If the customer subscribes to the higher speed (100/50 Mbps), you would not ratchet down their speed. If the customer at that location subscribes to a lower speed, for example 25/3 Mbps, the telco and ISP would need to increase the customer's speed to 100/25 Mbps, at least during testing weeks.

32. We are currently a CAF BLS recipient and reported locations deployed. Now, we are likely electing ACAM II. Will I now report all locations we can serve in the supported census blocks for ACAM II, without regard to whether we reported them for CAF BLS?

Answer: Yes. The deployment obligations will change. USAC's [HUBB FAQ](#) provides some guidance.

33. Should carriers report network upgrades to existing locations that were already certified in the HUBB during an earlier filing window? For instance, if a carrier deployed broadband with speeds of 10/1 Mbps in 2017 and reported those locations to the HUBB by March 1, 2018, should the carrier report an upgrade to 25/3 Mbps to those locations that took place in 2018 with the HUBB by March 1, 2019? And if so, should the carrier leave the original date of deployment unchanged?

All information subject to further modification pending FCC clarifications.

NECA Proprietary

Answer: Yes.

Carriers should report network upgrades to locations that were already filed and certified in the HUBB in prior years. To report a network upgrade, a carrier would use the edit function in the HUBB to upgrade the speed tier for the affected locations but leave the original date of deployment as is. The carrier must also indicate in the message box what part of the filing it is changing and the reason for the change. Please note that carriers must make these edits on a location-by-location basis. At present, the HUBB does not allow bulk edits.

34. Will ACAM carriers receive credit toward their 25/3 Mbps buildout obligations if they offer faster speeds and therefore select faster speed tiers when reporting locations in the HUBB? For example, if a company selects the 100/25 Mbps speed tier when filing a location in the HUBB, will that location count toward its 25/3 Mbps deployment obligation?

Answer: Yes.

Locations reported at faster speeds can count toward 25/3 Mbps, 10/1 Mbps or 4/1 Mbps buildout obligations. For instance, if a carrier is required to offer speeds of 25/3 Mbps at 100 locations, 10/1 Mbps at 100 locations and 4/1 Mbps at 25 locations, and it offers speeds of 100 megabits at 225 locations, it has met all its buildout requirements.

35. For what location within a structure should the latitude and longitude be determined, the ONT, the front door, etc.?

Answer: According to USAC's geolocation methods document, whenever possible, location coordinates should represent the structure being served and should be collected at some point inside the structure's footprint, also called a rooftop coordinate. Ideally, you should gather coordinates at a spot unambiguously associated with the structure, such as the network connection point or the front door.

36. If a carrier files late but has no milestones until 2020, are there still penalties?

Answer: There may be.

If a carrier deploys new locations in a calendar year meeting its minimum buildout requirements, it must report those locations by March 1 of the following year, regardless of its milestone dates. See section 54.316.

All information subject to further modification pending FCC clarifications.

NECA Proprietary