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FCC Releases Guidance Regarding Broadband Deployment Location Reporting Obligations

On December 8, 2016, the Federal Communication Commission (“FCC”) released a Public Notice providing guidance to Connect America Fund support recipients regarding their broadband deployment location reporting obligations. The FCC’s 2016 Rate-of-Return Order directed USAC to create an online portal for carriers to provide broadband deployment location information and certify to the accuracy. USAC is nearing completion of the first version of the High Cost Universal Broadband (“HUBB”) portal which will be available early 2017.

Reported location obligations and deadlines are dependent upon the type of support that each carrier receives as noted below. Carriers are encouraged to provide location information on a rolling basis within 30 days of service availability but no later than the annual reporting deadline.

CAF A-CAM Support Recipients – By March 1, 2017 and by March 1 in subsequent years, carriers must report via HUBB all **NEW** qualifying locations where broadband was deployed in the prior year. By March 1, 2019, carriers must report **ALL** qualifying locations prior to January 1, 2016 (pre-existing locations). CAF A-CAM support recipients must deploy broadband to 40% of the required locations by December 31, 2020 and certify to such by March 1, 2021.

CAF-BLS Support Recipients – By March 1, 2017 carriers must report via HUBB all **NEW** qualifying locations where 4/1, 10/1, and 25/3 broadband was deployed between May 25, 2016 (the effective date of Rate-of-Return Order) and December 31, 2016. By March 1, 2018 and by March 1 in subsequent years, carriers must report all **NEW** qualifying locations where broadband service was deployed for the prior calendar year. CAF-BLS support recipients must meet their five-year deployment obligation by December 31, 2021 and certify to such by March 1, 2022.

Phase II Model-Based Support Recipients – By March 1, 2017 carriers must report via HUBB all **NEW** qualifying locations where broadband service was deployed in calendar year 2016. By March 1, 2018 and by March 1 in subsequent years, carriers report all **NEW** qualifying locations where broadband service was deployed for the prior calendar year. The first interim milestone of broadband deployment to 40% of the required locations must be met by December 31, 2017 and carriers must certify to such by March 1, 2018.

Alaska Plan Recipients – By March 1, 2018 and by March 1 in subsequent years, carriers must report all **NEWLY** deployed or upgraded locations where broadband meeting the requirements of their approved performance plan became available in the prior calendar year.

In the Public Notice the FCC also clarified the meaning of “locations” for reporting purposes as follows:

Residential Locations

Housing Units (as defined by the Census Bureau) - Living quarters in which the occupant or occupants live separately from any other individuals in the building and have direct access to their living quarters from outside the building or through a common hall.

Apartment Buildings – Multiple housing units in a single structure at a single street address must be reported as a single record even though each unit will be counted as a separate location. The number of individual locations within the building structure will be identified via the Number of Units field.

Group Quarters – The Census Bureau does not classify group quarters (college dormitories, nursing homes, treatment centers, military installations, correctional facilities, etc.) as housing units. Group quarters should not be reported.

Business Locations

Small Businesses or Commercial Property - Report businesses where it is expected that consumer-grade broadband service (best-effort broadband internet access service) would be requested. Do not report larger businesses or anchor institutions that would be expected to order special access high-capacity transmission services.

Multiple Units - Office Buildings or commercial property that has one street address with multiple units or suites should be reported as a single record with a single pair of latitude/longitude coordinates. The number of units or suites within the building structure will be identified via the Number of Units field.

The reporting system will not accept duplicates. Unique latitude/longitude coordinates may only be submitted once. Address information is required for each entry but if no U.S. Postal Service street address is available, whatever information is available (intersection of two roads, block segment, or distance from nearby landmark) may be entered.

As a reminder, broadband service is considered available/deployed if the carrier can provide the service to the location or could provide the service within ten business days upon request.

Please contact your GVNW Consultant or Steve Gatto (830.895.7226, sgatto@gvnw.com) or Judi Ushio (719.594.5814, jushio@gvnw.com) or Jim Rennard (503-612-4410, jrennard@gvnw.com) with any additional questions or concerns you may have about the new rules for the location reporting obligations.