



TOC Conference

May 11, 2022

Federal Industry Update: Current Issues

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Plan. Grow. Thrive.



Topics of Discussion

- Recap of ACAM and Legacy Obligations
- Future of USF / Proposed Plans
- Budget Control Mechanism
- Rural Broadband Accountability Plan
- Broadband Data Collection (BDC) / Form 477

- The Transformation Order required RLECs to deploy broadband as a condition of receiving USF
- As part of this condition, the FCC established defined buildout obligations
 - A-CAM - as part of model offer
 - Legacy - certain percentage of CAF-BLS
 - Alaska Plan - according to the submitted performance plans
 - Rural Broadband Experiment and CAF Phase II auction winners
- Carriers demonstrate buildout obligations are being fulfilled by inputting locations in the HUBB
 - Includes carriers fulfilling obligations through non-regulated affiliates even though funds are disbursed to the ILEC



A-CAM I Buildout Requirements

A-CAM Payment Schedule (Chart 4)

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Annual A-CAM Support	\$3,451,566	\$3,451,566	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704
Transition Support	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Annual Support	\$3,451,566	\$3,451,566	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704	\$4,051,704
Monthly A-CAM Support	\$287,631	\$287,631	\$337,642	\$337,642	\$337,642	\$337,642	\$337,642	\$337,642	\$337,642	\$337,642	\$337,642	\$337,642

A-CAM Broadband Buildout Obligations (Chart 5)

	Locations in Census Blocks Receiving Model-Based Funding	25/3 BB Obligation	10/1 BB Obligation	4/1 BB Obligation	Reasonable Request
Locations	2,758	1,294	697	191	576



Where are you in your Buildout?

Revised A-CAM I

Deployment Milestones

• 10/1 Mbps	25/3 Mbps
2020 – 40%	2022 – 40%
2021 – 50%	2023 – 50%
2022 – 60%	2024 – 60%
2023 – 70%	2025 – 70%
2024 – 80%	2026 – 80%
2025 – 90%	2027 – 90%
2026 – 100% (5% grace)	2028 – 100% (5% grace)

Note: 5% grace locations are moved to the Capped Bucket



A-CAM II Buildout Requirements

A-CAM II Payment Schedule

	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Annual A-CAM Support	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365
Transition Support	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Annual Support	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365	\$6,833,365
Monthly A-CAM Support	\$569,447	\$569,447	\$569,447	\$569,447	\$569,447	\$569,447	\$569,447	\$569,447	\$569,447	\$569,447

A-CAM II Broadband Buildout Obligations

	Locations in Census Blocks Receiving Model-Based Funding	25/3 BB Obligation	4/1 BB Obligation	Reasonable Request
Total Locations	6,805	5,280	381	1,144
Tribal Locations	2,411	2,404	1	6



A-CAM II

Deployment Milestones

- 25/3 Mbps
- 2022 – 40%
- 2023 – 50%
- 2024 – 60%
- 2025 – 70%
- 2026 – 80%
- 2027 – 90%
- 2028 – 100% (5% grace)

START

GOAL

Note: 5% grace locations are moved to the Capped Bucket

CAF BLS Buildout Obligations

CAF BLS Buildout Requirements

May 2, 2019

SAC	Study Area	ST	ILEC Broadband Coverage Ratio	Land Density	Forecasted Five- Year CAF-BLS Support	Forecasted Five- Year CAF-BLS Support Times Required Percentage (Numerator)	Weighted Average Cost Method (Denominator)	Weighted Average Cost Method Buildout Requirement	ACAM Cost per Location (Denominator)	ACAM Cost Method Buildout Requirement
123456	THE ABC TEL CO	USA	0.92953	2.44300	\$21,654,425	\$4,330,885	\$2,475.42	1,749	\$6,831.18	633

- CAF BLS recipients have mandatory 5-year 25/3Mbps deployment obligations, beginning 2019
 - Previous requirement was 10/1, but with increased USF budget came increased obligations
 - Companies previously over 80% 10/1Mbps deployment did not have reporting obligations
 - All CAF BLS recipients now required to report deployment in HUBB

When do BB Performance Testing Requirements Begin?

Type of Company	Pre-testing Start Date	Pre-testing Results Due	Testing Start Date	Test Results Due
CAF Phase II (Price Cap carriers)	January 1, 2020	First week of 2nd and 3rd Qtr 2020	July 1, 2020	July 2021
Rural Broadband Experiment Winners	January 1, 2021	Within 7 days after the end of each Qtr 2021	January 1, 2022	July 2023
Alaska Plan Companies	January 1, 2021	Within 7 days after the end of each Qtr 2021	January 1, 2022	July 2023
A-CAM I Companies	January 1, 2021	Within 7 days after the end of each Qtr 2021	January 1, 2022	July 2023
A-CAM I Revised Companies	January 1, 2021	Within 7 days after the end of each Qtr 2021	January 1 2022	July 2023
ACAM II Companies	January 1, 2022	Within 7 days after the end of each Qtr 2022	January 1, 2023	July 2024
Legacy Rate of Return Companies	January 1, 2022	Within 7 days after the end of each Qtr 2022	January 1, 2023	July 2024
CAF II Auction Winners	January 1, 2022	Within 7 days after the end of each Qtr 2022	January 1, 2023	July 2024
NY Broadband Program Carriers	January 1, 2022	Within 7 days after the end of each Qtr 2022	January 1, 2023	July 2024

- Broadband, Equity, Access, and Deployment Program (BEAD) \$42.5 Billion
- Enabling Middle Mile Broadband Infrastructure Grants
- ReConnect Authorization
- Tribal Connectivity Program
- SmartGrid Investment Matching Grant Program

Future of USF Notice of Inquiry

- The FCC seeks comment on the effect of the Infrastructure Investment and Jobs Act (Infrastructure Bill) on existing USF programs and the ability of the FCC to reach its goals of universal deployment, affordability, adoption, availability, and equitable access to broadband throughout the nation
- Recommendations for future action on the High-Cost, Lifeline, E-Rate, Emergency Connectivity Fund, and Rural Health Care Programs
- Recommendations for future Congressional action



Contribution Reform

Two paths:

- Reform the current contribution methodology:
 - Add BIAS revenue to the assessment base.
 - Add revenues from entities who benefit from universal broadband service (including edge providers) to the assessment base.
- Change to a congressional appropriation.

Commenters expressed concern about residential consumers:

- Limit the impact on residential consumers.
- A two-part pricing structure resolves this concern:
 - Fixed connection-based fee for residential consumers, with a low-income exemption.
 - Variable revenue-based fee for business and edge providers.



A-CAM – 2020 Petition

- ACAM Coalition Petition
 - October 2020 Petition that proposes a voluntary election to extend the A-CAM program until 2034
 - No increase in annual A-CAM budget
 - Tiered commitment to reach 100/25 at year 2029 with increased obligations through 2034
- Pineland Petition Addresses an A-CAM I Anomaly
 - A-CAM I electing carriers were prevented from receiving support for census blocks with any amount of fiber or cable modem deployment while A-CAM II allows support for Census Blocks with fiber deployment and requires 25/3 offerings
 - Pineland Petition urges FCC to allow A-CAM I carriers to elect A-CAM II on a voluntary basis which would move 10/1 obligations to 25/3
 - Pineland now urging the FCC to adopt a Notice of Proposed Rulemaking on merging both ACAM Coalition and Pineland Petitions



A-CAM – Enhancement Plan

- Term
 - Additional 6 years of Support
 - Funding thru 2034
 - Increase support to start in 2022 (immediately upon approval).
- Deployment Requirements
 - 90% of all ACAM locations 100/20 Mbps, 10% at 25/3 Mbps
 - Current Reasonable requests, 4/1, 10/1 would all be eliminated
 - Deployment would have to be completed by the 8th year after the plan is adopted
 - Interim Milestones, 30% of eligible locations 100/20 in the 2nd year after the plan is adopted, with an additional 10% each year until the 90% Milestone is achieved

A-CAM – Enhancement Plan

- Support – Based upon one of two methodologies, whichever is greater
 - 80% of a company’s annual ACAM derived costs for its eligible locations; or
 - Up to \$300 per month for a company’s eligible locations
 - Participating ACAM I FTTH locations that are currently ineligible, would become eligible for funding
 - ACAM I Census Blocks that were ineligible due to competitor offering 10/1Mbps service, become eligible
 - No Additional funding would be provided if the BSLF process identifies a greater number of locations for a participating company than has been identified by the model
- Compliance
 - Participating ACAM companies that build to 95% of their total post BSLF locations in eligible census blocks at the speeds detailed above would be deemed in compliance with the requirements of the Enhancement Plan at the end of the program term
- **Approximate increase in annual support = \$387 Million**



Notice of Proposed Rulemaking (NPRM)

- FCC has ACAM BB Coalition Petition requested NPRM on the Agenda for the May 19th Open Meeting
- Seeks comment on many items
 - Speed up deployment years
 - Is the initial ACAM Model out of date?
 - Do proposed obligations justify the support increases?
 - Should there be lower level of support where carriers have already deployed fiber?
 - Should eligibility of Enhanced ACAM be extended to include ROR carriers that currently receive legacy support?



NTCA Enhancements of A-CAM Extension Offer

Deployment Obligations:

From:

- 90% at 100/20Mbps;and
- 10% at 25/3Mbps.

To:

- 30% at 1Gbps/500Mbps;
- 60% at 100/20Mbps (scalable); and 10% at 25/3Mbps.

Service-Level Milestones:

From:

Year 8 –100% of locations completed.

To:

- Year 2 –30%
- Years 3 -8 (10% added annually)
- Year 9 –100% of locations completed.



Legacy - 2024 Assessment

- All legacy carriers have broadband deployment obligations that end on Dec. 31, 2023
 - USAC has indicated that it will have an “All Done” section in the HUBB for those that deployed 25/3 to their locations prior to May 25, 2016
- FCC is scheduled to assess the budget for legacy carriers in 2024



Legacy Extension Offer – Incentive Option

Rural Association Group proposal:

- Voluntary "incentive option" for providers that are at higher levels of deployment.
- Recalibrate CAF-BLS buildout obligations:
 - Incentive Plan would be for 11 years, commencing on January 1, 2024.
 - “Buildout commitment” to be achieved by Dec 31, 2034, with updating of those service level commitments thereafter:
 - 30% of served locations in the study area (1 Gbps/500 Mbps).
 - 60% of served locations in the study area (100/20 Mbps, but scalable).
 - 10% of served locations in the study area (minimum of 25/3 Mbps).
- Companies may elect incentive regulation in lieu of continuing to receive CAF-BLS and HCLS support:
 - Current support (2021) will be frozen for six (6) years, then phased down by four (4) percent annually to reach 80 percent.
 - The current \$200 cap on support per connection would increase to \$250 to reflect the much higher levels of service called for by this plan.



Legacy Extension Offer – Incentive Option

Rural Association Group proposal:

- Companies not electing incentive regulation would remain on CAF-BLS/HCLS.
- If a carrier remains on rate-of-return regulation, no BCM for six (6) years.
- Service-level commitment milestones:
 - 30% of final service-level commitments by end of Year 2.
 - 10% additional annually until the completion of service-level commitments by end of Year 9.
- The CAF-BLS budget would continue to increase annually by inflation over the 11-year period, and the "savings" from the downward transitions of incentive companies would flow back to the CAF- BLS budget for those not on incentive regulation.
 - No BCM for the first six years, until the downward transitions for the incentive companies begin.
 - The CAF-BLS budget would be reset at the Year 6 levels prior to restarting the BCM for companies not electing incentive.



Legacy Extension Offer – Both Options

- Support continues after December 31, 2034, until the FCC redefines mechanisms, including any recalibrated speeds/network capabilities and associated budget revisions.
 - Companies electing the incentive option will continue to receive support for operating expenses at 80% of the frozen support level, with an opportunity to seek additional support for new investments and capital expenses incurred.
 - CAF-BLS and HCLS support would continue as is for legacy companies.
- **Approximate increase annual support = \$390 Million**

Budget Control Mechanism

- Public Notice released 6/29/16
- Became effective on 9/1/16
- Reduces high-cost support (HCLS & CAF-BLS) to all RoR LECs due to projected payments exceeding annual budget
- How much will the *haircut* percentage change?
 - July 2017 – June 2018 - 12.35% - Refunded
 - July 2018 – June 2019 - 15.52% - Refunded
 - July 2019 – June 2020 - .3661% - Not Refunded
 - July 2020 – June 2021 – 3.03269% - Not Refunded
 - July 2021 – June 2022 – 8.58146% - Eliminated prior to start date

Does not impact A-CAM electors



Budget Control Mechanism 2022-2023

Calculate Budget Control Factor 2022-2023

Summary of Forecasted Individual Mechanisms

HCLS (plus SVS)	\$	340,069,668
CAF BLS (plus True Up)	\$	1,060,094,035
Sum HCLS and CAF BLS Forecasted Amount	\$	1,400,163,703
Budget for HCLS and CAF BLS RoR Support Mechanisms	\$	1,200,219,872
Ratio of Budget/Forecasted Amount		0.8571997
Budget Adjustment Keep Factor (Minimum of above ratio and 1)		0.8571997
Budget Adjustment Keep Factor in Percentage Format		85.71997%
Budget Control Adjustment Factor		14.28003%
Total Amount After ProRata	\$	1,200,219,872
Total Amount After Minimum Threshold	\$	1,205,050,922
Industry-Wide Reduction After Minimum Threshold in Percentage Format		13.93500%



Budget Control Impact

- Legacy Company Impact by State
 - Minnesota (\$2,340,984) 7 Companies
 - North Dakota (\$11,706,805) 7 Companies
 - South Dakota (\$3,651,589) 10 Companies
 - Iowa (\$7,327,532) 46 Companies

Waived as of May 10, 2022



Rural Broadband Accountability Plan

More Audits!!!!

- Increased audits and verifications of support recipient
 - The number of audits and verifications will double in 2022 as compared to 2021 and include on-site audits as well as audits and verifications based upon random selection
 - USAC will conduct more verifications prior to a programs first required deployment milestone
 - The largest dollar recipients will be subject to an on-site audit in at least one state
 - Higher risk recipients will be subject to additional audits and verifications
 - Results of verifications, audits, and speed and latency performance testing will be made public on USAC's website



Beneficiary and Contributor Audit Program (BCAP)

- Continuing Property Records
- Review all aspects of revenue requirement development and cost development
- Unauthorized expenses
- Double recovery
- Affiliate transactions
 - Leases, agreements, contracts, market comparison
- Line count accuracy – disconnects, duplicates, correct SLC & ARC for line type, company officials
- Non-regulated adjustments
- Expense selections: payroll, timesheets, benefit and overhead spreads, invoices



Payment Quality Assurance (PQA) Audits

- PQA audits / reviews are increasing in quantity, as well as increasing in scope of audit
 - Both Cost and Average Schedule companies subject to PQA process
- Prior to 2018/2019, many PQA audits could be completed using only the information provided by consultants to NECA for typical review process
- USAC has clearly upgraded and augmented the PQA process and significantly more information is being requested now, often only for selected carriers
 - Carriers without High Cost Loop or less significant amounts of USF may see less data required



PQA Data Request - Basic

Documentation Reference Identifier	Description (FY22)
A2	<p>Trial Balance(s) related to the 2020 annual HCL filing (data as of 12/31/19) or, if filing quarterly, the most recent 2020 quarterly HCL filing. <u>Data should support the disbursement under review.</u></p> <p>Please provide the supporting documents if adjusted and book balance for accounts 2210 and 2230 are allocated in one account. For Example, account 2230 is included in account 2210. The supporting documents should show categorization/separation of Accounts 2210 & 2230 for the Adjusted Balance and Book Balance.</p>
B2	<p>Cost Study Workpapers related to the 2020 annual HCL filing (data as of 12/31/19) or, if filing quarterly, the most recent 2020 quarterly HCL filing. <u>Data should support the disbursement under review.</u></p> <p>Please provide the supporting documents if adjusted and book balance for accounts 2210 and 2230 are allocated in one account. For Example, account 2230 is included in account 2210. The supporting documents should show categorization/separation of Accounts 2210 & 2230 for the Adjusted Balance and Book Balance.</p>
C2	<p>Summary report, generated by Billing System, that supports the Category 1.3 Loops reported in the 2020 annual HCL Data Collection Form filing (data as of 12/31/19) or, if filing quarterly, the most recent 2020 quarterly (DAS) HCL filing. <u>Data should support the disbursement under review.</u></p> <p>In addition, please answer the following questions:</p> <p>1) Do the Official lines contain any TEST lines? a. <input type="checkbox"/> Yes *How many? _____ b. <input type="checkbox"/> No</p> <p>2) Do the Residential lines include any Lifeline lines? a. <input type="checkbox"/> Yes *How many? _____ b. <input type="checkbox"/> No</p> <p>3) Are any Vacation lines included in the Residential (RES), Single-Line Business (SLB), or Multi-Line Business (MLB) lines? a. <input type="checkbox"/> Yes Are they included in RES, SLB, or MLB lines? _____ How many? _____ b. <input type="checkbox"/> No</p> <p>3a) Can the Vacation lines be used to make outgoing calls and receive incoming calls, and have they been assessed SLC?</p>

4) Are there any suspended lines included in the reported total? If yes, can they be used to make outgoing calls, receive incoming calls, and have they been assessed the SLC?

Detailed documentation supporting the Access Recovery Charge (ARC) revenue, including:

a) The documentation (e.g., NECA's CAF ICC Data Collection/Submission Form) that supports the following Exchange Level Residential Lines and Local Rates components for ARC calculation:

- Residential Flat Rate
- Additional Basic Local Rate Charges
- Mandatory Expanded Calling
- Federal Subscriber Line Charge
- State USF Surcharge
- County E-911 Surcharge
- State E-911
- TRS and other hearing

b) Access tariff pages with the ARC rate for Residential (RES), Single-Line Business (SLB) and Multi-Line Business (MLB) lines

c) Access tariff page with multi-line business end user common line charge (EUCL)

Note:

The documentation (e.g., NECA's CAF ICC Data Collection/Submission Form - Pre-True-Up Filing View) should support the annual filing for the 2020 Program Year that was received by USAC on 6/16/2020. The documentation should support the following ARC revenue amounts:

- Residential (RES) ARC Annual Revenues: \$0
- Single Line Business (SLB) ARC Annual Revenues: \$10,728
- Multi-Line Business (MLB) ARC Annual Revenues: \$48,996

How to send documents to USAC:

Please upload supporting documentation to BOX via this link: <https://app.box.com/s/uh18bkdhbnpj7iq6ebqxy8315966im5y>



Extended Procedures List

TESTING AREAS	PQA REQUESTS
Expenses	Based on the FY22 PQA Testing Period shown above, please provide the following General Ledgers (in CSV or EXCEL format) for HCL and CAF BLS: 1) 2019 GL (1/1/2019 – 12/31/2019)
Assets	Based on the FY22 PQA Testing Period shown above, please provide the following Continuing Property Records (CPRs) for HCL and CAF BLS: 1) 2019 CPR (1/1/2019 – 12/31/2019)
Depreciation	Based on the FY22 PQA Testing Period shown above, please provide the following: 1) Depreciation/Amortization and related expense schedules (1/1/2019 – 12/31/2019) 2) Details for all additions and retirements in the schedules (1/1/2019 – 12/31/2019)



A-CAM I & Revised A-CAM I Verification Process Questionnaire Request

As a company receiving Connect America Fund support, you are subject to random audits and other investigations to ensure compliance with program rules and orders (see [47 CFR Section 54.320\(a\)](#)). This year, the Universal Service Administrative Company (USAC) has selected your company's deployment certification for review to assess compliance with Program Year 2021 deployment obligations. The official verification announcement will be sent in a few weeks, but to help prepare, we request that companies do two things beforehand:

1. Watch the [ACAM Verifications Entrance Conference Webinar](#) that walks through the steps of the verification process and discussing acceptable forms of evidence to support qualifying broadband deployment. Although this webinar is specific to the 40% milestone verification, the same information applies to all required milestones in the ACAM and R-ACAM programs.
2. Complete and submit the attached Process Questionnaire and provide examples of types of evidence your company can offer to support your broadband deployment for individual locations.



Process Questionnaire and Example Evidence

Location Identification and Reporting

1. How was the term “location” defined in order to report eligible locations?

Answer:

2. What was the process used to identify and report all locations meeting the criteria defined above as eligible locations for the Program?

Answer:

- a. How were locations without a current subscriber identified?

Answer:

- b. How were locations with multiple units in a single structure at a single street identified, and how was it ensured that the accurate number of units associated with such structures were determined and reported?

Answer:

Address and Geo-coordinate Mapping for Location Records

3. What geo-coding and mapping software tools were utilized to translate physical service addresses to latitude and longitude coordinates?

Answer:

4. What steps were performed to ensure that the actual service address corresponds with the reported latitude and longitude coordinates?

Answer:



Process Questionnaire and Example Evidence

Broadband Speed and Deployment Information

Please list all broadband packages offered to customers at Program locations. Please provide both download and upload speeds for each respective package.

Please provide documented evidence that your carrier offers a broadband speed package that meets the public interest obligation(s) for your program and is compliant with the applicable and latest benchmark announced annually by the Wireline Competition Bureau. Please include the download speed, the upload speed, data allowance, and price associated with the broadband speed package. The pricing of the broadband package must be for a standalone package and is exclusive of all discounts (coupons, bundling, introductory, etc.). The evidence can be in the form of internal documents, such as sales pricing lists or publicly available documents or websites, or a combination with the relevant information included.

What technologies were used to serve broadband to Program locations?

Were third party construction firms utilized to build-out to Program locations? If so, what types of documentation can be provided to substantiate broadband speed and date of deployment?

- a. If a Professional Engineer (PE) was utilized, please provide their name, full license number, and state(s) where licensed.

What internal systems were utilized to capture and report speed and deployment date? What types of documentation can be provided to substantiate the data in these systems?

Does your company provide a customer facing service availability tool? If so, is the tool based on customer postal addresses or zip codes only? Please provide a link to the service availability tool webpage, and describe the processes for populating and updating data within the tool.

How are latency and broadband speed tested to ensure compliance with FCC requirements?

- See 47 C.F.R. § § 54.308



Broadband Data Collection



- Fixed services deployment moving from reporting by census block to location-level
- Fixed wireless has added level of reporting requirements
- Mobile wireless has expanded specifications
- Deployment means where you have network facilities in place, and where you can perform a standard broadband installation (within 10 business days for fixed broadband)
- Same bi-annual reporting due dates as Form 477, to be filed in a new BDC portal, yet to be developed
 - September 1 will be the 1st BDC Filing for data as of June 30 of the same year
 - March 1 for data as of December 31 of the prior year

- Broadband, Equity, Access, and Deployment Fund (BEAD)
- Bulk of \$42B is waiting for FCC DATA maps
- Other possible uses:
 - RDOF II
 - Mobile 5G Fund for Rural America.
 - Future CAF support offerings.
 - RUS and NTIA to consult FCC DATA map before awarding funds for broadband.





Broadband Data Collection Options

1. List of served locations (Section 5.1)

- Homes or small businesses that can be provided broadband within 10 business days
- Addresses and geographic coordinates will be provided in the Broadband Serviceable Location Fabric
- Tabular data file
- Locations must be linked to a specific ID found within the Broadband Serviceable Location Fabric

2. Service Area Polygon (Section 5.2)

- Shapefile format
- Polygons used for wireline terrestrial service
- Propagation maps for fixed wireless service

Mobile Wireless

- Propagation maps are the only option, no addresses



Request a License to the Fabric

- Request a report via email: support@costquest.zendesk.com
- This version of the Fabric is a preliminary version.
All Location IDs will change for the production version.
- The Fabric report will give you all county locations for the counties overlapped by your reported CBs on your latest 477 report.

location id	address primary	city	state	zip	zip suffix	unit count	bsl flag	building type code	land use code	address confidence code	county geoid	block geoid	H3 9	latitude	longitude
9052264594	41 DOROTHY PERLEY RD	LEBANON	ST	55121	1158		TRUE	R	1		33009	330099617013000		43.64573857	-72.22770263
9052257704	41 DORCHESTER RD	LYME	ST	55121			TRUE	R	1		33009	330099609002000		43.78256434	-72.04882698
9052288855	41 DICK BROWN RD	BRISTOL	ST	55121	5306		TRUE	B	6		33009	330099612021035		43.64649896	-71.73394951
9052270132	41 DEPOT ST	ASHLAND	ST	55121			TRUE	R	1		33009	330099611011018		43.69083195	-71.6308193
9052245441	41 DAVISON LN	LYME	ST	55121	3713		TRUE	R	1		33009	330099609001003		43.83940673	-72.10072693
9052254350	41 DAISY HILL RD	LEBANON	ST	55121	2316		TRUE	R	1		33009	330099618012002		43.61917269	-72.23304739
9052269978	41 CULVER HILL RD	LYME	ST	55121	3304		TRUE	R	1		33009	330099609001007		43.84717102	-72.14786549
9052262580	41 CROSS ST	BETHLEHE	ST	55121			TRUE	B	3		33009	330099602001042		44.27743782	-71.68889248
9052259747	41 CRAFTS AVE	WEST LEB.	ST	55121	1105		TRUE	R	1		33009	330099617022010		43.65321836	-72.31126255
9052262900	41 COXBORO RD	HOLDERN	ST	55121			TRUE	R	1		33009	330099611021026		43.72229362	-71.56881792
9052275197	41 COTTAGE DR	PLYMOUTH	ST	55121			TRUE	R	1		33009	330099610022048		43.71788902	-71.66476331
9052291341	41 COREYS MOBILE HOME	LITTLETON	ST	55121	5605		TRUE	R	1		33009	330099601011011		44.30643473	-71.75342555



Reporting the Data: File Format

provider_id	brand_name	location_ID	technology	max_advertised_download_speed	max_advertised_upload_speed	low_latency	business_residential_code
468352	Comm Co	9052264594	50	1000	1000	1	R
468352	Comm Co	9052257704	50	100	20	1	R
468352	Comm Co	9052288855	50	100	20	1	B
468352	Comm Co	9052270132	50	100	20	1	R
468352	Comm Co	9052245441	50	1000	1000	1	R
468352	Comm Co	9052254350	50	100	20	1	R
468352	Comm Co	9052269978	50	100	20	1	R
468352	Comm Co	9052262580	50	100	20	1	B
468352	Comm Co	9052259747	50	1000	1000	1	R
468352	Comm Co	9052262900	50	100	20	1	R
468352	Comm Co	9052275197	50	100	20	1	R
468352	Comm Co	9052291341	50	100	20	1	R
468352	Comm Co	9052253289	50	100	20	1	R
468352	Comm Co	9052256449	50	100	20	1	R
468352	Comm Co	9052262436	50	100	20	1	R
468352	Comm Co	9052264667	50	100	20	1	R
468352	Comm Co	9052257022	50	100	20	1	R

- 1. Certifying officer of the company.**
- 2. Engineer:**
 - If a corporate officer is an engineer, a filer may submit a single certification to fulfill both Requirements.
 - FCC is more focused on the engineer's knowledge of the system rather than specific accreditations of the certifying individual.
- **Be on time!**
 - The FCC has made it clear: “any requests for waivers or extensions of the filing deadline will face a high hurdle even at the starting gate.”
 - Failure to timely file required data may lead to enforcement action and/or penalties.



QUESTIONS?



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