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NOVEMBER 18, 2016

SPECIAL BULLETIN

Consumer Broadband Only Loop Service Tariffing Issues

In the RoR USF Reform Order, RoR carriers are given the choice of how to treat, from a tariff perspective, consumer broadband only loop (CBOL, a/k/a data only broadband/DOBB) rates. The options are (1) tariffed with NECA, (2) tariffed via the company-specific tariff, or (3) detariffed. You should have received information from NECA Industry Relations (NECA IR) recently informing members of these options and which steps to take. It is important to carefully consider this decision and take the appropriate actions by the deadlines.

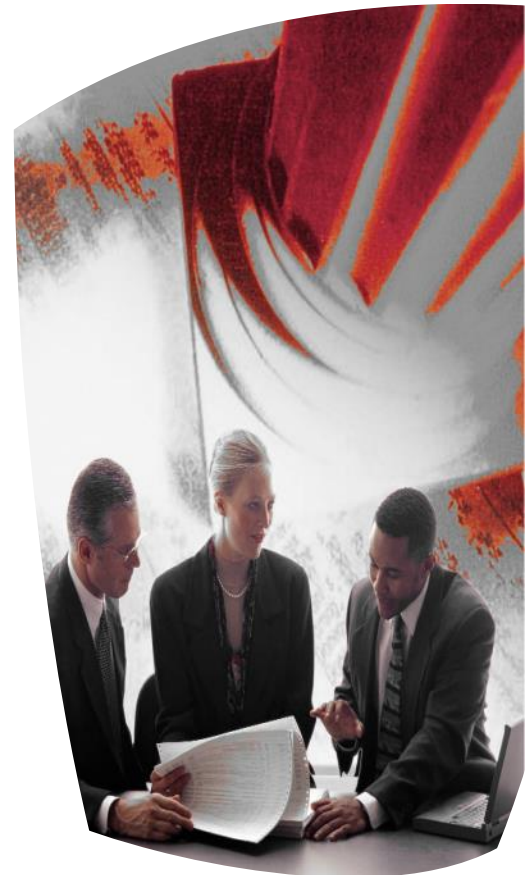
Following are some guidelines for determining the next steps:

- (1) If a RoR carrier does not provide any CBOL/DOBB, and did not report any such projected demand in the recent form 508 reporting, then no action needs to be taken (do not log on to the NECA website and make any election).
- (2) If a RoR carrier is currently in the NECA DSL pool, and reported current or projected CBOL/DOBB demand, we recommend having NECA take care of the tariffing actions. **Log on to the NECA website (see below) and follow the instructions. This must be done no later than 11:59p eastern time on November 23.**
- (3) RoR carriers may also tariff the CBOL/DOBB in company-specific interstate tariffs. In these cases, no actions outside the tariff revision process (filings due December 19), are necessary
- (4) If a RoR carrier is currently providing DSL service on a detariffed basis, we **recommend providing the CBOL/DOBB on a detariffed basis.** This election, and the notice procedure discussed further below, must occur by December 3, 2016 (30 days prior to the January 3, 2017 tariff filing effective date).

Detariffing Requirements

Specific steps must be taken in order to provide CBOL services on a detariffed basis:

1. A written notification must be sent to existing CBOL customers giving them a minimum of 30 days notice of the detariffing. The notice must include the following:



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Questions? Comments?

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- A. Name and Address of ILEC
- B. Effective date of the change
- C. The geographic area impacted
- D. A brief description of the change and services impacted
- E. If the ILEC will be providing detariffed CBOL service to nonaffiliates, then it must include in the notice the location at which customers may view a description of its service offerings. The description of the service offerings must include rates, terms and conditions. A copy of the service offering must be maintained at one place of business and on the company’s website. The site address should be included in the customer notification.

Note—for most companies, this notice will be sent to the affiliated ISP only

2. At least 30 days prior to the effective date, a written notification to the FCC which should include all of the information in the customer notice plus the following:
 - A. Reference to Docket No. 02-33 “Notice of Detariffing of Common Carrier Broadband Internet Access Transmission Service”
 - B. The date and a brief description of the method used to give customers notice
3. Copies of the notification sent to the FCC must also be sent to the state Governor and Public Utilities Commission in the states in which the ILEC does business, and to the Special Assistant for Telecommunications at the Department of Defense.

Tariffed services must not subsidize detariffed services; therefore ILECs must ensure that all costs relating to CBOL service are removed from their cost studies and NECA tariff projections.

NECA Tariffing Option Instructions

For companies who have broadband-only demand or projected to have broadband-only demand in their recent 508 data submission, NECA’s filing will introduce the new CBOL rate element for any company choosing the tariff option and modify the broadband-only rate element to reflect only second mile transport in special access for companies in the DSL tariff. The filing will also reflect FCC ordered reductions in CAF ICC support due to imputation of ARC rates on broadband only lines starting January 1st . We are asking you to indicate if you wish to have NECA tariff your CBOL rate. This option selection must be made no later than 11:59 pm EST November 23, 2016, on NECA's [website](#) (login required) under My Applications > USF Reform Order Options.

Please let us know if you have any questions.



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