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DECEMBER 16, 2016

SPECIAL BULLETIN

Federal Universal Service Obligations *Location Reporting*

In several instances in the FCC’s ongoing efforts to reform the federal universal service programs, the need to report locations served with broadband has been made clear. For example, rate-of-return regulated carriers choosing the Connect America Fund Broadband Loop Support (CAF BLS) must report newly served locations (10/1, etc., broadband service) by March 1 each year. USAC is required to gather this information and has, according to a FCC [public notice](#), nearly completed the online system to be known as High Cost Universal Service Broadband (HUBB) portal.

The HUBB is the result of a collaborative process, with input received from many within the telecommunications industry. As a result, the hope is the system will be easy to use and provide for an efficient method for carriers to report the necessary geo-located data. The public notice referenced above is meant to provide guidance for carriers in order to develop “internal policies and procedures to comply” with all the applicable regulations during 2017.

The following support recipients are required to file some type of location data via the HUBB:



Carrier Type	Deadline	Locations Reported
RoR (CAF BLS)	3/1/2017	Newly served with qualifying broadband between 5/25/16 and 12/31/16
RoR (ACAM)	3/1/2017	Newly served with qualifying broadband during 2016
AK Plan	3/1/2018	Newly served with qualifying broadband during 2017
CAF Phase II	3/1/2017	Newly served with qualifying broadband during 2016

Note: for ACAM carriers, there is also a requirement to report pre-existing locations (prior to January 1, 2016) by March 1, 2019.



Alexicon

Questions? Comments?
Contact Chris Barron

chris@alexicon.net



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Recipients of Rural Broadband Experiment (RBE) support are required to meet certain deployment milestones, which are now to be reported via the HUBB (starting in 2018 for 2016 data).

USAC expects the HUBB to begin accepting data in early 2017; in the meantime, carriers should visit USAC's HUBB [portal](#), review pertinent material, and become familiar with what will be required. Of particular interest is information on geolocation methods and location reporting.

Finally, note that the FCC encourages carriers to report newly served locations on a rolling basis, where data is input to the HUBB within 30 days of service initiation. In this way, carriers can avoid a significant yearly event and the HUBB portal can better handle the traffic.

Conclusion / Next Steps

- ⇒ All RoR carriers should ensure the ability to geolocate customers, especially those newly served with qualifying broadband during 2016. See USAC's [guide](#) for more information.
- ⇒ Become familiar with the HUBB portal (to the extent possible)
- ⇒ Consider undertaking a data validation check that is currently available at the HUBB portal
- ⇒ As soon as the HUBB starts accepting data, we recommend carriers begin uploading data to ensure validity prior to the March 1, 2017 deadline.

Please let us know if you have any questions.



Alexicon

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chris@alexicon.net