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JUNE 2, 2016

## SPECIAL BULLETIN

### Form 481 Revisions

The FCC recently [received](#) Office of Management and Budget (OMB) approval for several changes to [Form 481](#). While many of the changes are either minor or not applicable to many RoR carriers, there is one fairly major addition to this year's form of which all companies should be aware—reasonably comparable broadband rate certification. Also, it is important to note that changes adopted in annual ETC reporting requirements in the FCC's March 2016 *RoR USF Reform Order* will not affect this year's Form 481 filing.

#### Reasonably Comparable Broadband Rates

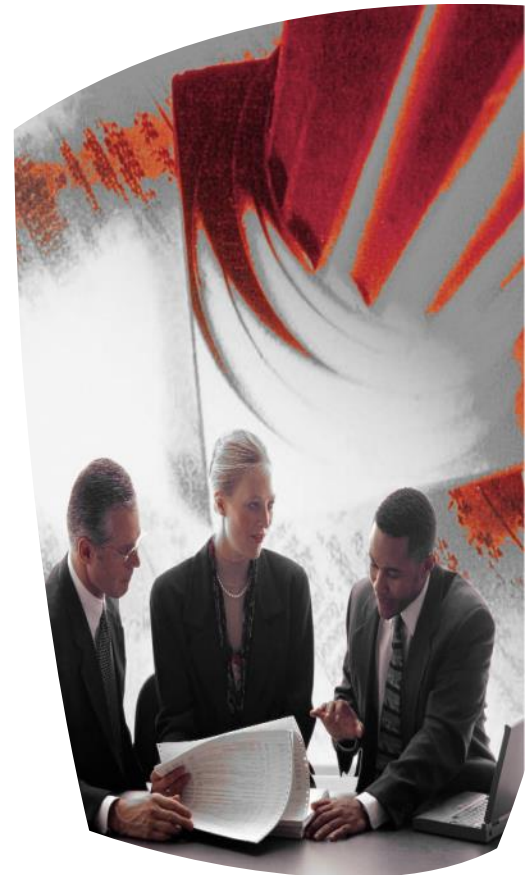
As with past year's required certifications regarding the reasonable comparability of voice service rates (Form 481, section 1000), ETCs will be required this year to certify (and provide supporting documentation) that broadband service is available at rates that are reasonable comparable to a national average urban rate. The broadband rate comparability benchmark is released by the FCC's Wireline Competition Bureau each year, with the latest being on [April 5, 2016](#) (see also the 4/7/2016 Special Bulletin). There is an [online tool](#) available to calculate the specific rate benchmark for particular service offerings; for example 10/1 mbps fixed broadband service with unlimited monthly capacity (or a bundle/package containing the service, or voice/data DSL) must be priced at or below \$75.20 per month in order to qualify as "reasonably comparable."

#### Reasonably Comparable Voice Rates

The reasonably comparable voice service benchmark rate this year is \$41.07, meaning all ETCs must certify that at least one local residential voice service is priced at or below \$41.07.

#### E-Rate Bidding Certification

All ETCs will be required to certify (line 3009) that bids were placed on category one telecommunications and Internet access services in response to all reasonable requests in posted FCC Form 470s seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries (as described in § 54.501) within its service area, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings.



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Questions? Comments?

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## **Recipients of Rural Broadband Experiment Funding**

Recipients of the FCC's Rural Broadband Experiment (RBE) funding are under new reporting and certification requirements:

- Certify that they offer broadband to identified locations meeting the requisite public interest obligations, including speed, latency, usage capacity, and rates that are reasonably comparable to rates in urban areas.
- Provide the number, names, and addresses of community anchor institutions to which the ETC began offering broadband service in the preceding calendar year.
- Provide geocoded locations to which broadband has been deployed and also attach associated evidence demonstrating they have met the relevant public service obligations for these locations.

## **Community Anchor Institutions**

While not a new requirement this year, the FCC has adopted a template for ETCs to use in reporting the number, names, and addresses of community anchor institutions to which the ETC began offering broadband service in the preceding calendar year. The various Form 481 upload templates are available [here](#).

## **Five Year Plan Progress Report**

All ETCs will, for the final time, be required to provide a progress report on the five year service quality improvement plan most carriers initially submitted in 2014 (similar to last year's). The FCC's RoR USF Reform Order eliminated the five-year plan progress report requirement effective in 2017, but replaced it with additional reporting (see April 5, 2016 Special Bulletin).

## **Revised Protective Order**

Most ETCs file a portion of the Form 481 with the FCC as confidential, and do so pursuant to an FCC-adopted protective order (sections typically filed as confidential include the five year plan progress report and the RoR ETC financial information). The Wireline Competition Bureau recently adopted a [new protective order](#) that somewhat reduces the steps necessary to maintain confidential information. In general, the number of copies required has been reduced for filings containing confidential information—this year, only one copy of the confidential filing has to be filed with the FCC, and the redacted version is to be filed via the FCC's Electronic Comment Filing System (ECFS). We will send Form 481 filing instructions as the July 1 due date draws nearer.

Please let us know if you have any questions.



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