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## SPECIAL BULLETIN

### ACAM Challenge Process

The Wireline Competition Bureau released an [Order](#) late yesterday addressing the various challenges made by carriers regarding the A-CAM broadband coverage data. In the FCC’s March 30, 2016 *RoR Carrier USF Reform Order* (see April 5, 2016 and June 20, 2016 *Special Bulletins*), an option was presented to RoR carriers to have universal service support calculated by the FCC’s cost model (A-CAM). Since the FCC decided that locations in census blocks already served by unsubsidized competition are not to be supported, a challenge process was established for carriers to argue that broadband coverage in the ACAM (based on June 2015 Form 477 data) is not accurate (see April 8, 2016 *Special Bulletin*). For carriers considering the ACAM path, this was the first and an important step in the decision making process, with the next step being a final release of the ACAM results that will constitute the initial offer of ACAM-based support for all carriers/study areas.

According to the Order, the Bureau received 146 comments containing 273 challenge requests. Of those, 80 were granted, 73 were denied, and 124 were “dismissed” (not addressed for various reasons—see further discussion below).

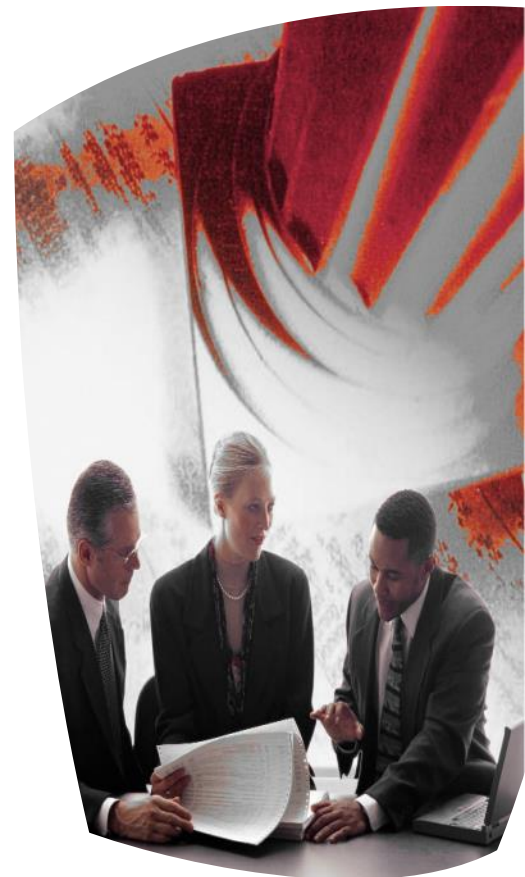
More importantly, the Bureau announced that it will release “shortly” the Public Notice containing the offer of support and associated deployment obligations. This upcoming Notice triggers the 90 day deadline for carriers to indicate the intent to accept ACAM-based universal service support.

In general, the Bureau did as instructed by the FCC—accepted challenges only in the presence of sufficient evidence. Several companies were denied requests to update and correct Form 477 data, with the Bureau noting that even though some companies misinterpreted filing instructions, that this isn’t an unusual situation and “indeed, it appears that quite a few parties have failed to correctly file their Form 477 data.”

The dismissals of challenges made fell into three categories—split census blocks, affiliate providers, and several instances where the challenger “apparently did not look at the actual coverage data in A-CAM, but only looked at the Form 477 data posted on the Commission’s web site.” Dismissing the challenges based on split census blocks, where questions arose in situations where a census block straddles two or more study areas, took the most explanation by the Bureau.

A list of the specific challenges and Bureau’s dispensation thereof is included in the Appendix to the Order.

If you have any questions, please contact us.



**Alexicon**

Questions? Comments?

Contact Chris Barron

[chris@alexicon.net](mailto:chris@alexicon.net)