

VPS Memo

Preliminary Eligible Areas for RDOF Phase I Auction Released

LIMITED CHALLENGE PROCESS AND FILING DEADLINE SET

Challenge Filing Deadline: April 10, 2020

Preliminary Eligible Locations Released

On March 17, 2020, the Wireless Competition Bureau (WCB) released a Public Notice that announced the preliminary list of census blocks and a map of areas that have been deemed initially eligible for the Rural Digital Opportunity Fund (RDOF) Phase I auction (Auction 904). The WCB also released a list of the associated census block groups and reserve prices, as well as associated census tracts and reserve prices.

The census block information can be found on the Auction 904 website: <https://www.fcc.gov/auction/904>

The map of the initially eligible areas can be found at: <https://www.fcc.gov/reports-research/maps/auction-904-preliminary-eligible-areas>

Limited Challenge Process Available

The WCB also set forth a limited challenge process with filings due by April 10, 2020. The challenge process will give parties an opportunity to identify and challenge census blocks that fall into one of the following three categories:

1. Blocks have become served with voice and 25/3+ broadband since the FCC Form 477 data used for the RDOF census block eligibility (June 30, 2019 data).
2. If a census block is subject to “an enforceable commitment to offer broadband service at 25/3 Mbps or better and for which funding has already been paid or a formal commitment has been executed.” Parties are “invited” to highlight such areas.

3. As with the CAF Phase II auction, any RLECs (rate of return carriers) that don't want to provide broadband in a census block in their ILEC area can place it into the RDOF auction instead.

The WCB will release the final list of eligible blocks prior to the short-form application deadline. Between now and then, we expect the WCB to update the list to reflect any comments received identifying areas for exclusion or inclusion consistent with the three categories identified above.

Challenge Process Due April 10, 2020; Assistance Available

VPS is prepared to assist you with the limited challenge process. Please let us know if you identify any potential census blocks that fall within the three categories that can be challenged and need assistance in filing your challenge or if you need assistance in identifying potential census blocks so that you can file a challenge.

Recommended Next Steps

VPS recommends the following action items for potential bidders considering participation in the RDOF auction:

- 1. Review Preliminary Maps for Areas of Interest**
- 2. Determine CapEx, which feeds into a feasibility analysis**
 - a. Review integration to existing network
 - b. Determine route mileage
 - c. Electronics placement
 - d. Network architecture
 - e. Review construction corridors (aerial vs. buried)
 - f. Preliminary layouts/network design
- 3. Undertake 10-year feasibility analysis**
 - a. Incorporate CapEx estimates
 - b. Include broadband and voice
- 4. Determine monthly support (RDOF Funds) needed per location**

Vantage Point is prepared to answer any general questions you may have, and to assist with these and other needs pertaining to the RDOF auction:

- Identify census blocks that can be challenged and/or submitting filings for challenges
- Get ready by planning for the RDOF Auction
- Short-form application processing and submittal
- Long-form application processing and submittal
- Auction bidding and assistance
- Transitional Guidance – Legacy Support & CAF Phase II Model-Based Support

Additional Information

The link to the full Public Notice is here: <https://docs.fcc.gov/public/attachments/DA-20-275A1.pdf>

For information or if you would like VPS guidance, please contact these members of the Vantage Point Solutions RDOF team:

Troy Eilts at (605) 995-1819, Troy.Eilts@vantagepnt.com

Steve Gatto, JD at (830) 895-7226, SGatto@gvnw.com

Kristy Szabo at (605) 995-1786, Kristy.Szabo@vantagepnt.com

Doug Eidahl, JD at (605) 995-1750, Doug.Eidahl@vantagepnt.com

Nathan Weber, PE at (605) 995-1747, Nathan.Weber@vantagepnt.com

Julie Darrington at (605) 995-1746, Julie.Darrington@vantagepnt.com

Quentin Flippin, PE at (605) 995-1744, Quentin.Flippin@vantagepnt.com

