

VPS Consulting Memo

HUBB Filing

CARRIERS MUST FILE BY MARCH 1, 2021.

Summary

A reminder that all carriers participating in modernized Connect America Fund (CAF) programs must file High-Cost Universal Broadband (HUBB) deployment data via USAC's HUBB portal by March 1, 2021. Below are the programs and the reporting timeframes:

- **ACAM I** – Report all newly deployed/upgraded locations for calendar year 2020
- **ACAM II** – Report all newly deployed/upgraded locations that are pre-existing (any date up to and through December 31, 2018) as well as calendar year 2020
- **Legacy CAF BLS** – Report all newly deployed/upgraded locations for calendar year 2020
- **Legacy CAF BLS who previously did not have reporting obligations** – Report all newly deployed/upgraded pre-existing locations (March 25, 2016 through December 31, 2018) as well as calendar year 2020
- **Alaska Plan** – Report all newly deployed/upgraded locations for calendar year 2020 along with Middle-Mile Maps
- **RBE** - Report all newly deployed/upgraded locations for calendar year 2020
- **CAF Phase II Auction** - Report all newly deployed/upgraded locations for calendar year 2020

Key Information

Here are a few important items to keep in mind:

- Even if a carrier has no locations to upload, carriers are still required to login to the USAC HUBB portal and certify to such.
- ACAM I and Revised ACAM I recipients first milestone must be certified in addition to the normal HUBB upload certification process by March 1, 2021. Specifically, the current ACAM I and Revised ACAM I milestone is 40% of the original fully funded ACAM locations. This second certification is found on the "Milestone Certification and Reporting" tab of the HUBB. USAC is working on updating this tab so the option to certify may not be available just yet but it will be available before the March 1 deadline.

- Note that carriers who were previously CAF BLS but are now ACAM II recipients may have locations uploaded in the HUBB that are no longer deemed eligible due to the locations not falling within eligible ACAM II census blocks. USAC will be reaching out to carriers in this situation within the next couple of weeks to notify them that those locations will not be transferred and will not count toward their obligations.
- Carriers have received severe fiscal penalties for not complying with the reporting requirements.

Also, a reminder that pre-testing performance measures begins first quarter 2021 for the following programs so it's important to ensure HUBB locations thru 2020 are uploaded as quickly as possible in order to flow to the Performance Measure Module (PMM) for random sampling. Carriers must complete one full week of speed and latency testing by March 31, 2021 and report the results by April 7, 2021. Carriers will not face financial penalties for failing to meet speed and latency standards during the pre-testing period.

- ACAM I
- ACAM I Revised
- Alaska Plan
- RBE

The FCC has issued a limited waiver due to the COVID-19 pandemic. For all four quarters in 2021, carriers are only required to conduct pre-testing to 70% of the USAC-generated random sample of subscriber locations.

Additional Information

Our team can help keep you on track with your HUBB reporting, milestones, geocoding, mapping locations to study area boundaries or eligible census blocks, performance testing, and much more. For information on this issue or if you would like VPS guidance, please contact these members of the Vantage Point Solutions Consulting team:

Courtney Spears at (830) 895-7221, Courtney.Spears@vantagepnt.com

Troy Eilts at (605) 995-1830, Troy.Eilts@vantagepnt.com

Stephanie Griffin at (830) 895-7242, Stephanie.Griffin@vantagepnt.com

