

# **VPS Consulting Memo**

# FCC Emergency Broadband Benefit Program

Public Notice Released March 4, 2021.

# Summary

The Federal Communications Commission (FCC) unanimously adopted an Order on February 25th establishing the Emergency Broadband Benefit Program (EBB). The \$3.2 Billion appropriated by Congress in the Consolidated Appropriations Act of 2021 will lower high-speed Internet costs for eligible households during the COVID-19 pandemic. This will help struggling families to access and use the Internet for telework, telemedicine and for continued virtual learning.

The Public Notice announcing the Milestones for the EBB program can be found here.

# **Key Information**

## **Important Dates for Providers**

The Public Notice announced the following dates:

EBB Program Milestone	Filing Location	Date
Non-ETC Provider Application & Alternative Eligibility Verification Process Portal Opens	FCC	March 8, 2021
Provider Election Notice Inbox Opens	USAC	March 11, 2021
Non-ETC Provider Priority Application & Alternative Eligibility Verification Process Deadline	FCC	March 22, 2021

#### Milestones for Emergency Broadband Benefit Program

The FCC released a Public Notice to announce the milestone dates for the provider application and election process. The FCC started accepting applications on March 8, 2021 for non-ETC providers to apply for the EBB program. The deadline for providers to submit their applications to the FCC is March 22, 2021. The FCC will have an on-line portal for the applications, which can be found at: <a href="https://www.fcc.gov/emergency-broadband-benefit-program">https://www.fcc.gov/emergency-broadband-benefit-program</a>.

All providers approved to participate by the FCC must apply to the Universal Service Administrative Company (USAC) to be part of the program. This includes all existing ETCs and their affiliates and all service providers who will receive EBB approval from the FCC. USAC will start accepting elections on March 11, 2021. All elections must be emailed to USAC at: <a href="mailto:ebbelection@usac.org">ebbelection@usac.org</a>.

The chart below identifies the steps for a provider to consider when offering the EBB. First, a provider must determine if it qualifies to offer the program. Next, a provider must receive FCC approval (if needed). Finally, a provider must make an election to USAC to offer the program. After the election is approved by USAC, providers will gain access to systems which support offering the program.

Existing ETC provider? •Broadband Internet Access Service (BIAS) Provider on December 1, 2020? Qualify? •Existing Low-Income Program on April 1, 2020? Non-ETCs require FCC approval - portal open March 8, 2021 and deadline March 22, 2021 • Automatic Approval (Existing Low-Income Program on April 1, 2020) Require FCC • Expedited Approval (BIAS Provider on December 1, 2020) approval? •To participate all providers must submit an election with USAC (open March 11, 2021) ETCs and Affiliates Petition USAC Non-ETCs after FCC approval received Build business practices and processes to offer EBB USAC Systems, Billing System Operational •Staff Business Practices and Customer Education/Marketing Readiness

### What Can Providers Do Now and When Can You Start Your Election?

#### ETCs - Make an election to USAC

Providers with an existing ETC designation can make an election to USAC starting March 11, 2021 for themselves and their affiliates who provided broadband service as of December 1, 2020 within the states or territories where the provider was designated as an ETC.

#### Non-ETCs – Prepare and submit an FCC application

- Providers without an existing ETC designation must seek either automatic or expedited approval from the FCC prior to submitting the election notice to USAC. The window for a non-ETC to complete the on-line application opened on March 8, 2021.
  - After approval is received from the FCC, a provider is qualified to apply to USAC to participate in the program.

Key Information that may be needed to apply to the FCC or submit a USAC election:

- SAM.gov Registration Completed
- CORES ID (FCC Registration)
- SPIN (Service Provider ID)
- DUNS#
- States to Provide EBB In
- Service Authority in States
- Customer Eligibility Process to be Utilized

- Plan to Fight Waste Fraud and Abuse
- Services & Rates Offered December 1, 2020
- Services to be Offered
- FCC Form 477 from December 2020
- ZIP Code or Census Block Where Service will be Offered
- Connected Devices to be Offered

#### What is Required to be a Participating Provider?

Service Providers interested in participating in the program must:

- Have been a provider of BIAS to households as of December 1, 2020.
- Be a provider or an affiliate of a provider with existing ETC status in a state or territory or a provider approved by the FCC under an automatic approval or expedited approval process.
- Participating providers must be registered in the Lifeline system, which is administered by USAC. The Lifeline system will be associated with the National Verifier, the National Lifeline Accountability Database (NLAD), the Representative Accountability Database (RAD), and the Lifeline Claims System (LCS). The LCS will be where providers will receive their funds from the EBB Program for any discounts provided under the program.

## **Additional Information**

Vantage Point Solutions will be presenting a webinar going over the details and next steps for the EBB Program on Tuesday, March 16 at 1:00 PM CST. To register, please <u>click here</u>.

A memo was released on March 2, 2021 providing an overview of the FCC Report and Order that was released on February 25, 2021. A copy of that memo can be downloaded here.

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

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