

Affordable Connectivity Program Rules are in Effect

IS YOUR COMPANY IN COMPLIANCE?

The Federal Communications Commission (FCC) program rules for the Affordable Connectivity Program (ACP) are now in effect. Review program requirements, educate your staff, enroll subscribers, and submit monthly claims.

Program Compliance

The ACP has significant service provider and subscriber requirements. To participate, service providers must have an accepted USAC election and subscribers must have an approved application. Approved ACP providers and subscribers must follow all program rules. Below are basic reminders.

ACP Service Provider Compliance Activities

- ACP election approval and annual certifications
- ACP offered on all services
- ACP availability education and FCC complaint process notification
- Consumer protection requirements in place
- Unjust and Unreasonable acts or practices avoided
- Affirmative opt-in and notices for new enrollments/transfers
 - *Transfers must have a written notification of transfer*
- Claims submission planning and associated reporting
 - ***Non-usage and cure period requirements (Effective June 14, 2022)***
 - Non-Usage reporting for all \$0.00 invoice subscribers on a rolling 30-day basis

- Service providers serving **tribal lands** are eligible to utilize a non-usage **waiver** until Sept. 15, 2022. Eligible service providers must notify USAC by July 14, 2022, if they would like to utilize the waiver.
 - Claims submission by the 15th of the month, revisions for 6 months
- Record retention in place to support ACP program requirements
- ACP broadband subscription reporting (rulemaking in progress)

Subscriber Compliance Activities

- National verifier (application ID available) or alternative verification application approval
- Subscriber selection of service provider
- Annual recertification completion by USAC or alternative eligibility verification provider
- Notification of household changes within 30 days
- Annual updates for those qualifying based on school eligibility

IMMEDIATE ACTIONS RECOMMENDED

Vantage Point recommends validating your business practices and processes. Below are examples of standard practices to review:

Subscriber Sign-up Business Practices

- Subscriber eligibility approval by USAC or alternative eligibility verification provider
- Subscriber opt-In documentation
- Invoice credit application
- ACP Education for new sign-up, service changes and website

ACP Claims submission

- Application of the Subscriber credit to the next billing cycle
- Cross-checking billing system to NLAD
- Non-payment 90-day disconnect
- Usage reporting for services with a \$0.00 invoice
- Submit claims prior to the 15th of each month

HERE TO HELP

For additional information on the ACP, draft documentation to utilize, staff education or compliance education please contact any of these members of the Vantage Point Solutions Consulting Team:

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Or contact your Customer Relations representative.

