

VPS Consulting Memo

Supply Chain Data Collection (SCDC) Annual Report due March 31, 2023

ALL BROADBAND PROVIDERS MUST REVIEW THE UPDATED COVERED LIST TO DETERMINE IF A FILING IS REQUIRED.

Background

The Secure and Trusted Communications Networks Act of 2019 established the requirement for providers of Advanced Communications Services to report and certify annually information regarding purchasing, renting or leasing any equipment from the FCC's Covered List of equipment or services that are deemed to pose a threat to national security interests.

Who Must File the Report?

All providers of Advanced Communication Services were required to file by May 5, 2022, regardless of whether they had equipment or services identified on the Covered List. This was the first time this filing was required.

CFR 47 §1.50001 defines Advanced Communications Services as high-speed, switched, broadband telecommunications capability that enables users to originate and receive high-quality voice, data, graphics, and video telecommunications using any technology with connection speeds of at least 200 kbps in either direction.

All providers must review the FCC's [Updated Covered List](#) of equipment. Action will be dependent on a provider's previous filing and usage of items on the updated Covered List.

- **ACTION REQUIRED** – Providers that previously reported “yes” to having purchased, leased, or otherwise obtained communications equipment or services that was included on the Covered List on or after August 14, 2018, are required to file by March 31, 2023. Providers in this situation need to review the updated Covered List and identify if they have any additional equipment or services that need to be reported.

- **ACTION REQUIRED** – Providers that previously reported “no” to having purchased, leased, or otherwise obtained communications equipment or services that was included on the Covered List on or after August 14, 2018, and after reviewing the updated Covered List determine the answer is now “yes,” must file by March 31, 2023.
- **NO ACTION REQUIRED** – Providers that previously reported “no” to having purchased, leased, or otherwise obtained communications equipment or services that was included on the Covered List on or after August 14, 2018, and after reviewing the updated Covered List determine the answer is still “no,” no further action is required.

How is the Report Completed?

The report is completed in the [FCC's Supply Chain Annual Reporting System](#) using CORES login credentials which consists of an email address for the username and the associated password (same login credentials as the FCC previous Form 477 portal and BDC portal). Filers with multiple subsidiaries or affiliated entities are encouraged to file a single, consolidated Supply Chain Annual Report.

Additional Information

Please reach out to the following team members with any questions or concerns, or if you need assistance completing the filing:

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