

RDOF Compliance Overview

Vantage Point has recently fielded a number of questions from RDOF winners about what needs to be filed and when. Below is a high-level overview of these requirements. For more detailed information, or guidance specific to your situation, please reach out to the Vantage Point staff members listed below.

Deployment Obligations:

Milestone Requirements (separate certification from standard HUBB)

- 40 percent of deployments by the end of year 3
- 60 percent of deployments by the end of year 4
- 80 percent of deployments by the end of year 5
- 100 percent of deployments by the end of year 6¹

Annual Filing Obligations:

- HUBB Reporting – Due annually by March 1
- Annual Section 54.313 – FCC Form 481 by July 1
- ETC 54.314 Annual certification with the State or FCC
- Performance Measures Testing (generally starts in year 3)

Lifeline

- FCC Form 555 Annually
- Lifeline Claim monthly or at designated intervals within a year
- Annual Advertisement

Voice Reporting

There may be additional requirements for voice reporting to be completed such as CPNI Reporting, Battery Backup Compliance, 911 Reliability Certification, STIR/SHAKEN, state requirements and others depending on how the voice service is being provided.

¹ By the end of Year 6, the FCC will publish revised locations, which will prompt an updated milestone to hit all revised locations counts by end of Year 8. FCC-20-5A1 III.E.2.

Contribution Base Reporting

FCC Form 499

Note: The threshold for *de minimus* status during calendar year 2023 is \$39,062. Interstate and international revenues greater than this amount requires carriers to become a contributor to the Universal Service Fund.

Irrevocable Standby Letter of Credit

Winning service providers are required to provide irrevocable standby letters of credit until USAC verifies specific deployment milestones have been met. Basic requirement information is below:

- 18 months of total support in year two
- Two years of total support in year three
- Three years of support in year four

Service providers that have attained a 20% deployment milestone should ask USAC for a verification review to potentially decrease the letter of credit requirement.

Assistance Available

Final requirements are in the service provider's specific RDOF award Public Notice from the FCC. USAC also provides additional information regarding the requirements at: <https://www.usac.org/high-cost/funds/rural-digital-opportunity-fund/>. For more information or assistance in completing any of these requirements, please contact one of the members of the Vantage Point Consulting team:



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