

JULY 11, 2018

## Client Memo

# FCC Adopts Broadband Network Testing Requirements

The FCC's Wireline Competition Bureau (WCB) has established a uniform framework for testing the speed and latency performance for recipients of high-cost universal service support who serve fixed locations. Testing results will be submitted as a part of carriers' annual compliance certifications. Failure to comply with the established Network testing rules and the required service performance obligations will result in a reduction in support, proportionate with level of noncompliance. In addition, noncompliant carriers will be subject to an audit of all testing data submitted.

## Companies Who Must Comply

All USF high-cost support recipients, including price cap carriers, rate-of-return carriers, rural broadband experiment support recipients, Alaska Plan carriers, and CAF Phase II auction winners.<sup>1</sup>

## Three Options to Conduct Required Performance Testing

The FCC provides three options for a flexible approach to the required network performance testing. The three options are:

1. Measuring Broadband America Testing Infrastructure (MBA Testing)
2. Existing network management systems and tools (off-the-shelf testing)
3. Carrier-developed self-testing configurations

Carriers may deploy any of these three options as long as the carrier's implementation meets the testing requirements established by the FCC.<sup>2</sup>

## Timing of Testing

There are four main points to the timing and frequency of network testing.

1. When testing latency, the FCC is requiring that carriers have a minimum of one separate test per minute. This results in 60 tests per hour, for each of the testing hours, at each subscriber test location, with the results of each test recorded separately.<sup>3</sup>

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<sup>1</sup> WC Docket No. 10-90, DA 18-710 Para. 1

<sup>2</sup> WC Docket No. 10-90, DA 18-710 Para. 7-10

<sup>3</sup> WC Docket No. 10-90, DA 18-710 Para. 27

2. For speed testing the FCC is requiring a minimum of one download test and one upload test per testing hour at each subscriber test location. Carriers will be required to start a separate download and upload speed test at the beginning of each test hour window.<sup>4</sup>
3. The FCC has also captured seasonal effects on carrier’s broadband performance. Carriers will be required to conduct one week of testing, subject to the latency and speed testing requirement, each quarter of the calendar year. Testing each quarter will reflect a carrier’s performance throughout the year, especially during the seasonal increase or decrease in network usage.<sup>5</sup>
4. Carriers must conduct daily testing during the week of testing each quarter of the calendar year. Daily testing will be conducted between 6:00PM and 12:00AM local time (testing hours), including on weekends.<sup>6</sup>

Testing for all locations with a single speed tier in a state must be done during the same week. There will be cases where a carrier has more than one speed tier in a state and in this case testing for each speed tier can be conducted during different weeks within the quarter. For carriers serving multiple states, testing of each service tier does not need to be done during the same week.<sup>7</sup>

## Number of Test Locations

The subscribers eligible for testing must be at locations that are reported in the HUBB with an active subscriber.

Required Test Locations for Speed	
Number of Subscribers at CAF-Supported Locations per State and Service Tier Combination	Number of Test Locations
50 or fewer	5
51-500	10% of total subscribers
Over 500	50

<sup>4</sup> WC Docket No. 10-90, DA 18-710 Para. 28

<sup>5</sup> WC Docket No. 10-90, DA 18-710 Para. 29

<sup>6</sup> WC Docket No. 10-90, DA 18-710 Para. 30

<sup>7</sup> WC Docket No. 10-90, DA 18-710 Para. 33

## Additional Resources

If you have any questions or need assistance with your network testing method, please feel free to contact the following VPS staff members:



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