

October 18, 2019

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte, Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

On October 16, 2019, USTelecom and its members (collectively “USTelecom”) met with members of the Wireline Competition Bureau and USAC as part of a continued discussion about how edits made to the High Cost Universal Broadband (HUBB) portal would be viewed for purposes of complying with the Connect America Fund. The full list of participants is below.

USTelecom has previously expressed the necessity of developing a method for bulk uploads of changes to the HUBB system because its members report a substantial degree of geocoordinate variability based upon which commercial mapping vendor the carrier uses. As geocoding improves, USTelecom anticipates that many or even most of the edits that HUBB filers will make will be related to geocoordinates.¹ USTelecom understands that USAC has developed exactly such a system and appreciates the work of the Commission and USAC that went into developing this solution.

USTelecom had previously written that “a change to the fourth digit of a geocoded decimal (representing a change in accuracy of about 10 meters) would be a workable demarcation point for determining a change that required a deletion (versus a modification). However, the Commission should be aware that USTelecom members anticipate that a substantial number of corrected geocodes will qualify as “deletions” under this approach.”² USTelecom understands that USAC has implemented such an approach into the new system for editing HUBB locations. However, when locations are deleted and “new” locations (bearing all of the same information as the deleted locations—such as addresses—except for updated geocodes) are uploaded in their place, the “deployment year” will be updated to the year in

¹ See Letter from Mike Saperstein, Vice President, Policy & Advocacy, USTelecom, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Sept. 4, 2019) (Sept. 4 Ex Parte); Letter from Mike Saperstein, Vice President, Policy & Advocacy, USTelecom, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Mar. 28, 2019); Letter from Mike Saperstein, Vice President, Policy & Advocacy, USTelecom, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Mar. 6, 2019).

² Sept. 4 Ex Parte at 1.

which the new location is added—not necessarily the year in which the service was actually deployed.³

The issue under discussion was, what does it mean, if anything, from a compliance perspective, if the locations are no longer represented in the HUBB with the original year of deployment? USTelecom expressed its concern that if a carrier “deleted” a number of locations for a certain year and then those same locations were re-uploaded in the HUBB with a different deployment year, it could retroactively call into question the carrier’s compliance with previous milestone reporting.⁴

After discussion, all parties (USTelecom, Commission staff, and USAC) understood that if the carrier had previously met a deployment year’s milestone, and then, by virtue of “deleting” and resubmitting locations with better geocodes, fell under the milestone for a particular year (because those locations were now assigned to the current deployment year), there would be no compliance penalty as long as the cumulative number of locations submitted to date for the life of the program remained above the current threshold. All parties understood that USAC would not be re-auditing previous deployment milestones that were considered met based upon actions taken to update geocoordinate in the HUBB.

With this knowledge in hand, USTelecom again expressed its appreciation to the Commission and USAC for helping to improve the HUBB reporting system.

Respectfully submitted,

_____/s/_____
Mike Saperstein
Vice President, Policy & Advocacy

³ For example, assume a carrier had deployed to Location X in 2018 and Location X counted towards the carrier’s 60% deployment milestone under the CAF II program; in this case Location X is listed in the HUBB as having been deployed in 2018. If, however, in 2019 the carrier needs to correct Location X’s geocode and the alteration causes a change to the fourth decimal point of the geocode, then a carrier would “delete” that location and upload the corrected geocode. Location X would now be in the HUBB with the corrected geocode, except it would now show in the HUBB as having been deployed in 2019, not 2018, by virtue of the fact that it was deleted and the resubmitted. Modifications (geocode changes to the fifth decimal point of the geocoordinate or less) would continue to show as the original year of deployment.

⁴ Building on the example above, assume that the carrier had deployed to exactly 60% of its milestone target in 2018. If the carrier “deleted” Location X and resubmitted it, the total number of cumulative deployed locations in the HUBB would remain the same, but the carrier would now be under 60% deployed as of 2018, according to the HUBB’s display, because Location X would now show as deployed in 2019.

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MEETING PARTICIPANTS

FCC

Nissa Laughner (WCB)
Alex Minard (WCB)
Gilbert Smith (WCB)

USAC

Ashish Bakshi
Joelle Tessler
Tim Weith

USTelecom (In Person)

Brendan Haggerty (AT&T)
Mike Saperstein (USTelecom)
Thomas Whitehead (Windstream)

USTelecom (Via Phone)

Hany Fahmy (AT&T)
Ken Buchan (CenturyLink)
Jeff Lanning (CenturyLink)
Richard Rousselot (CenturyLink)
Barb Galardo (Consolidated)
Diana Eisner (Frontier)
Paul Jarvis (Windstream)
Tim Loken (Windstream)