



5 Davis Farm Rd
Portland, ME 04102

February 14, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On behalf of its affiliated local exchange carriers (“LECs”), Consolidated Communications Inc. (“CCI”) hereby files a list of locations to which it deployed broadband services meeting the Commission’s Connect America Fund (“CAF”) Phase II requirements as of December 31, 2018. For each year in the program, carriers are required to file by March 1st, with a certification, their list of locations to which they deployed CAF II-supported services as of the previous December 31st.

CCI timely filed its required reports, including the most recent report, due March 1, 2018, for the 40 percent interim CAF Phase II deployment deadline of December 31, 2017, in the High-Cost Universal Broadband (“HUBB”) portal administered by USAC.¹ However, it has come to CCI’s attention that a number of the locations identified by CCI in its previously certified HUBB filings are not accurate. In some cases this inaccuracy is due to the unreliability of the available third-party geo-coding software. For example, an address can be keyed into the software to yield one set of coordinates, and re-keyed into the same software for a second time to yield a second set of coordinates. By this filing, CCI seeks to provide the Commission and USAC with a current, accurate list of its CAF Phase II locations.

Pursuant to Section 54.316(b)(1) of the Commission’s rules, no later than March 1st each year, CCI must certify that, “by the end of the prior calendar year, it was offering broadband meeting the requisite public interest obligations specified in §54.309 to the required percentage of its supported locations in each state as set forth in §54.310(c).” In addition, no later than March 1st each year, CCI must file specific geo-coded location information confirming its CAF Phase II deployment as of the previous December 31.² CCI is concerned that, in order for these required certifications to be truthful, complete

¹ CCI also met its 60 percent interim CAF Phase II deployment deadline as of December 31, 2018, as will be reported in the HUBB on or before March 1, 2019.

² See 47 C.F.R. §54.316(c)(1).



Marlene H. Dortch, FCC Secretary
February 14, 2019

and accurate in the upcoming March 1, 2019 filing, the location information on file with the Commission and USAC must be accurate.

Having had exposure to the many issues involved with utilizing software to accurately geo-code a location, and experience in resolving these issues, the company now is able to more precisely identify the locations to which it has deployed CAF II-eligible services. However, CCI is unable to modify the location identification coordinates in the HUBB – the system does not permit it. The HUBB system allows manual edits to address locations but does not allow for bulk uploads. CCI needs to make many edits to improve the accuracy of the addresses in the HUBB. While CCI is working to make those updates, one by one, CCI provides the attached list in advance of the March 1st certification requirement to ensure that the CAF II locations provided by CCI reflect all known corrections needed to the existing HUBB data. CCI believes the enclosed data clearly identifies the most accurate information currently available on CAF II-eligible locations served by CCI.

CCI understands that the difficulties the company has experienced in updating and correcting HUBB entries is also experienced by other carriers and has been brought to the attention of the Commission's Wireline Competition Bureau.³ Certain information in the HUBB cannot be corrected or deleted except by manual manipulation by USAC personnel. Other corrections must be uploaded one location at a time. CCI hopes the Commission and USAC will promptly address these shortcomings. In the meantime, CCI respectfully requests that this list of locations to which CCI deployed broadband services meeting CAF II requirements as of December 31, 2018 be accepted and made part of the record in this proceeding.

A copy of this filing also is being provided to the Universal Service Administrative Company, affected Tribal governments, where applicable, and the public service commission for each state in which CCI operates a LEC that receives CAF Phase II support.⁴

Please contact me if you have any questions.

Sincerely,

/s/Barbara B. Galardo

Barbara B. Galardo, Director Cost & Access

³ See, e.g., Letter from J. Banks, U S Telecom, to Marlene H. Dortch, FCC Secretary, WC Docket No. 10-90 (filed Feb. 27, 2018).

⁴ See 47 C.F.R. §54.320(d).



Marlene H. Dortch, FCC Secretary
February 14, 2019

Enclosure

cc: Kris Monteith, Chief, Wireline Competition Bureau
Ryan Palmer, Chief, Telecommunications Access Policy Division
Alexander Minard, Deputy Chief, Telecommunications Access Policy Division
Preston Wise, Office of FCC Chairman Pai
Universal Service Administrative Company High-Cost Program
State Commissions & Tribal Governments