



March 6, 2019

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Re: USTelecom Ex Parte Notice, WC Dkt. No. 10-90, *Connect America Fund*

Dear Ms. Dortch:

USTelecom writes to propose a system for batch-updating the USAC High Cost Universal Broadband (HUBB) portal. This proposal is a follow up to USTelecom's December 19, 2018 meeting with Wireline Competition Bureau staff and the USAC High Cost and Office of General Counsel teams.¹

USTelecom members' experience with Connect America Fund (CAF) reporting has revealed that service providers must be able to update periodically location information filed in the HUBB. Both the nature of network deployment and the vagaries of rural geocoding information make a bulk update process necessary to ensure the continued validity of the information in the HUBB. This is particularly true for providers that accepted CAF Phase II model support in 2015 and have since uploaded hundreds of thousands of locations into the HUBB.

In order to allow for efficient edits to the HUBB, USTelecom proposes that USAC establish a specific process for periodic bulk modifications. This process would be available to carriers with 100 or more locations to update. We understand that carriers wishing to modify fewer records will be able to make edits, one at a time, directly in the HUBB portal. The process would work as follows:

- Deletions: a provider submits a file containing all of the locations that a provider wishes to delete from prior filings to USAC. Due to the HUBB's limited functionality available to providers, this file will be transmitted to USAC personnel (e.g., via email at hccerts@usac.org) to implement into the HUBB.
 - To aid program administration, this file would not require a code explaining the reason for each deletion, but a provider would be required to maintain a record of the rationale for deleting a location and make that information available in an audit.

¹ Letter from Mike Saperstein, USTelecom, to Marlene H. Dortch, FCC, WC Docket No. 10-90 (filed Dec. 21, 2018).

- Modifications: a provider submits a file containing updates to existing locations (e.g., modified address, latitude/longitude, unit count, year deployed). This file would also be transmitted directly to USAC personnel outside of the HUBB reporting system.
- New Locations: a provider continues to submit all newly reported locations directly to the HUBB, including new locations deployed in prior years but not previously reported.²

In order to promote the efficient administration of such a process, USTelecom proposes to limit the frequency of such filings. Specifically, USTelecom proposes that the bulk update process would be available to providers once a quarter with submission dates specified by the Commission and/or USAC. USTelecom recommends that March 1 be the first quarter filing deadline, which aligns with the HUBB filing deadline and is when many providers will have the most up to date information). This proposal is intended to balance the need to maintain HUBB data quality while limiting the burdens on USAC staff.

While these proposed changes do not eliminate all difficulties with HUBB reporting—for instance the HUBB’s current method of handling multiple dwelling units is problematic and must be a topic of further discussion—USTelecom members believe this bulk update method is an administratively efficient means of keeping current on their commitment to providing broadband to ultimately over 3.6 million rural locations.

Please contact me with any questions.

Sincerely,

_____/s/_____
Mike Saperstein

Vice President, Law & Policy

cc: Alex Minard, Jesse Jachman, Nissa Laughner, and Gilbert Smith

² See Cincinnati Bell Telephone Company LLC Petition for Waiver or Clarification of Section 54.316 of the Commission’s Rules, WC Docket No. 10-90 (filed Feb. 25, 2019) (we support Cincinnati Bell’s position that CAF Phase II support recipients are permitted to report and certify all units built on a prospective basis so long as the units are not duplicative of already submitted units.).