

# FairPoint Communications

FCC Presentation July 20, 2015

CAF II Location Reporting

In FairPoint NNE (Northern New England):  
Maine, New Hampshire, Vermont

# CAF II Offer in NNE

- FairPoint is only price cap company in Northern New England (ME, NH, VT)

State	Eligible CBs	Locations	Average No. Locations Per CB	CAF II ROFR
Maine	4,891	35,500	7.3	\$13.38 million
New Hampshire	2,479	13,131	5.3	\$4.38 million
Vermont	3,793	28,399	7.5	\$8.85 million
Total NNE	11,163	77,030	6.9	\$26.61 million

# FairPoint NNE Location Analysis

- Potential Lat/Long Information Sources:

Potential Resource	Result of Investigation
Company Records	Not suitable for Lat/Long determination Not complete where we don't serve a location
CAF Model	Many locations arbitrarily placed
Census Bureau	Considered golden source for quantity but no lat/long information
E911	VT E911 is accurate NH E911 is not publicly available ME E911 is somewhat accurate
Commercial Postal	Reasonably complete, but limits on mapping many addresses to lat/long
Property Parcel Information	Not complete and hard to map

# Results of Location Analysis

State	Eligible CBs	ROFR Locations	Found Locations with Lat/Long	Total Locations with Census Bureau Housing Units Analysis	Known Number of Locations without Lat/Long
Maine	4,891	35,500	42,961	57,955	14,994 (26%)
NH	2,479	13,131	13,702	23,677	9,975 (42%)
Vermont	3,793	28,399	50,926	52,441	1,515 (3%)
Total	11,163	77,030	95,189	134,073	26,484 (20%)

Estimated cost to physically identify locations in NNE is \$9 to \$11 million using FairPoint technician workforce (assumes one day per CB or one hour per location)

# Why FairPoint is Unique Regarding Location Information

- Although FairPoint is currently in the process of digitizing maps, it does not currently have complete and accurate location information from its systems
- Many homes in NNE are second homes, often seasonal residences, and don't show up on commercial mailing lists (see Fish Pond slides) – the Census Bureau shows many CBs with housing units but no population
- NNE is very rural with many portions of Maine not covered by ILEC study areas
- Even a satellite view roof survey is problematic given the forest cover and the oblique satellite coverage -- over 90% of Maine is forested, the highest percentage of any state:  
<http://www.forestsformainefuture.org/forest-facts/>

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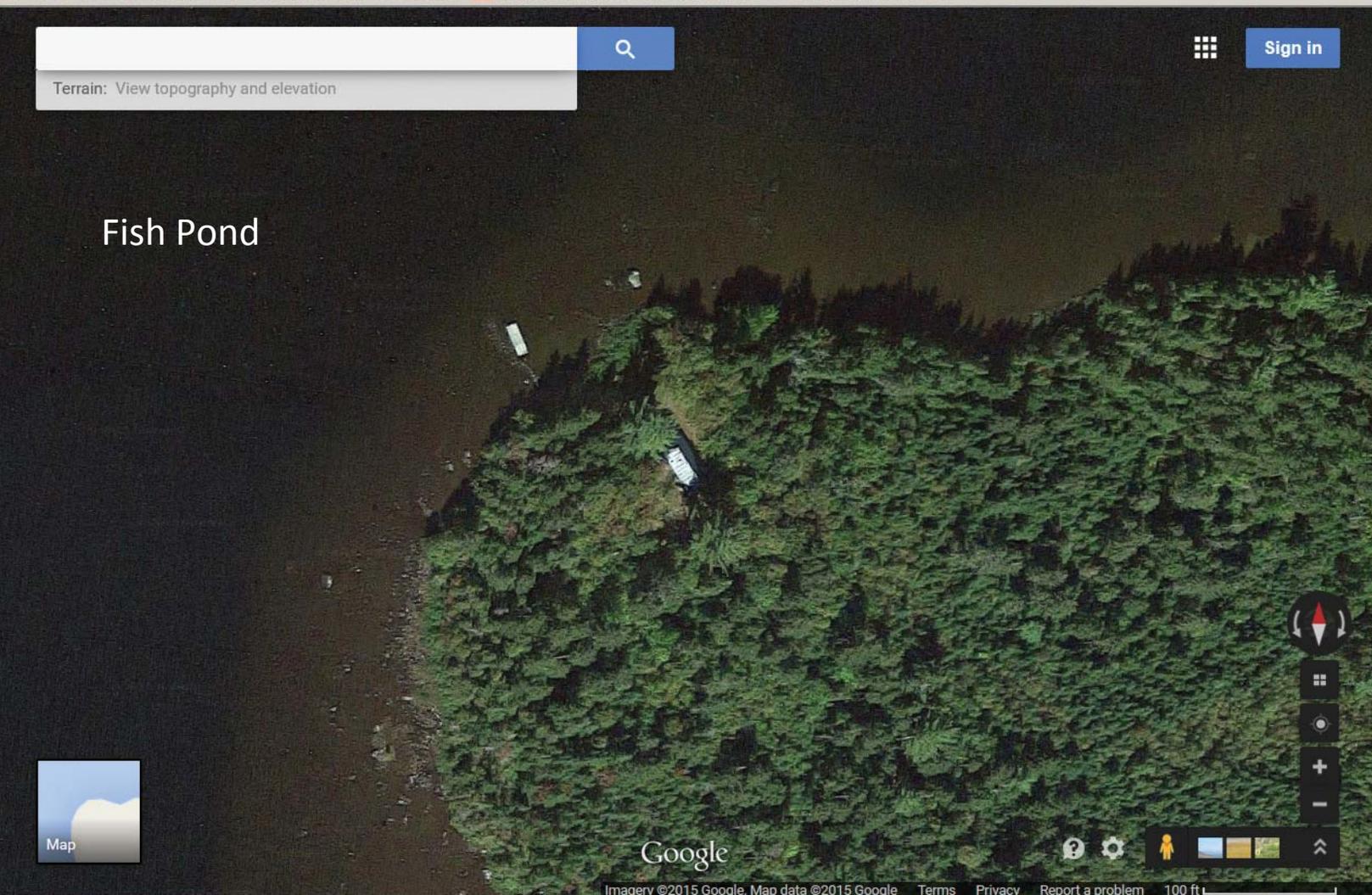
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Terrain: View topography and elevation

# Fish Pond

Sign in

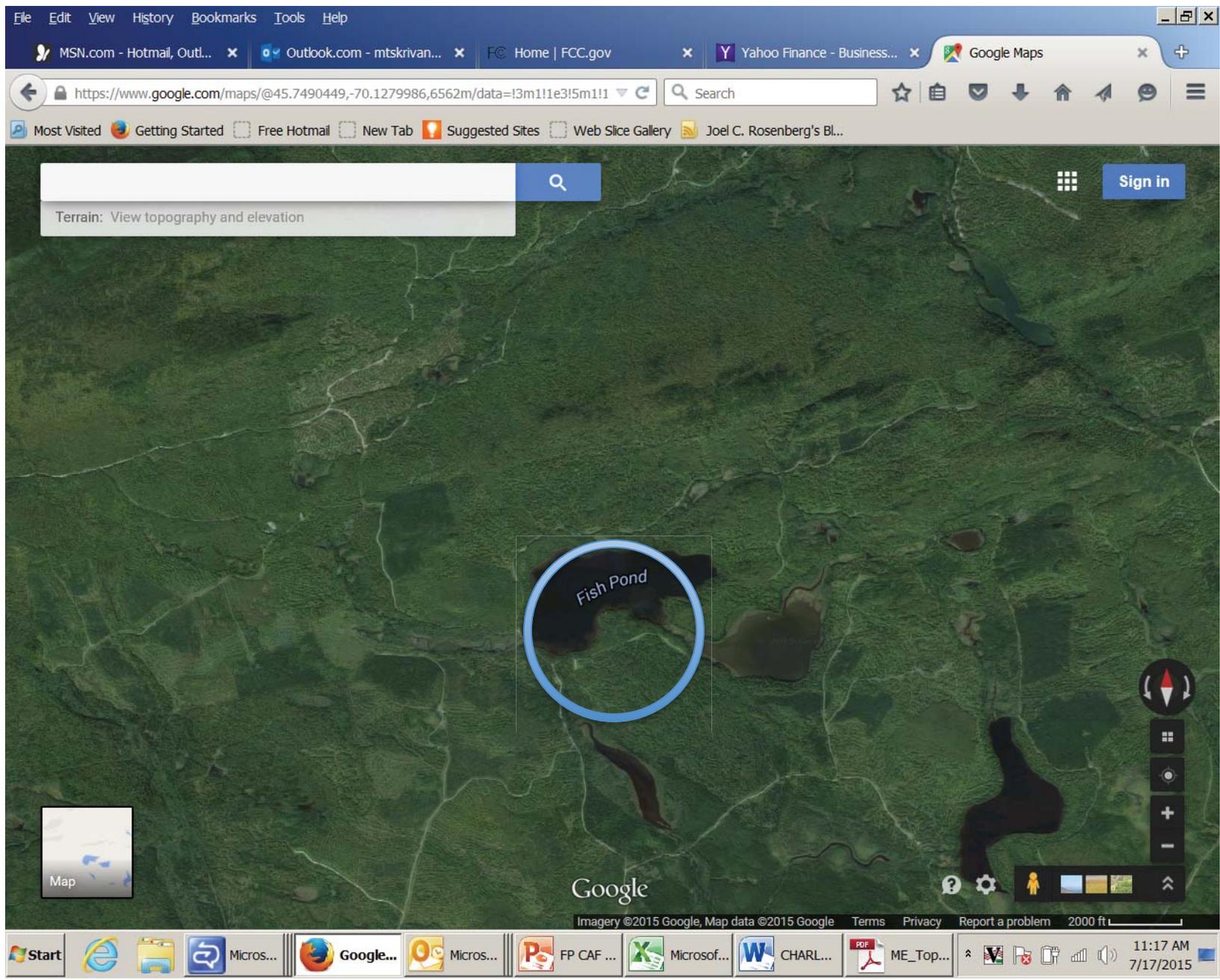


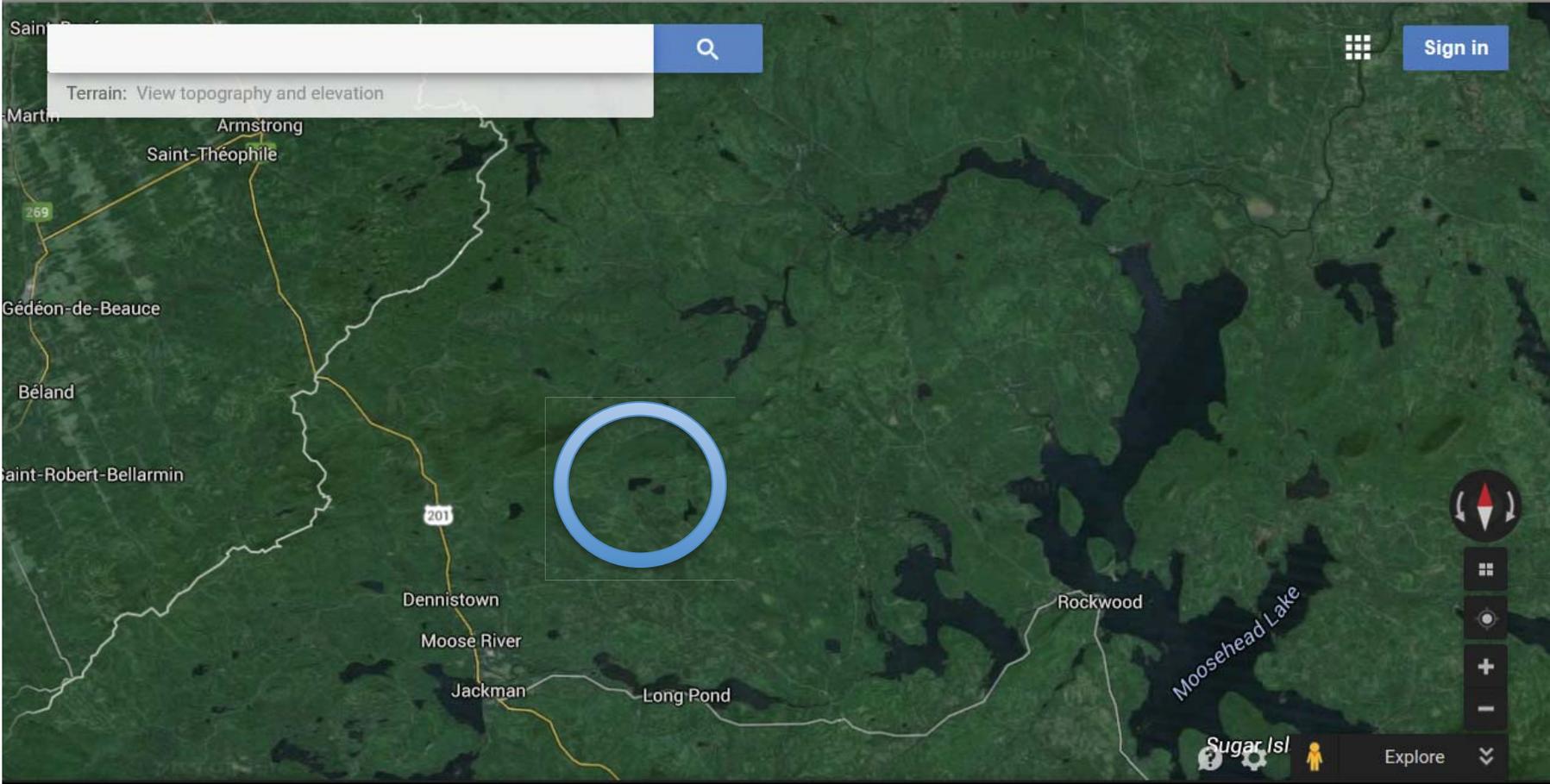
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# Location Reporting Under CAF II Rules

- If FairPoint NNE accepts CAF II ROFR, it must on July 1, 2016 file a list of the geocoded locations already meeting the Section 54.309 public interest obligations as of December 31, 2015
- On July 1, 2017 and each July 1 thereafter, CAF II recipients must file a list of the geocoded locations to which it has deployed facilities meeting the Section 54.309 requirements using CAF II support in the prior year
- Geocoded locations include latitude & longitude

# FairPoint Location Data Analysis

- FairPoint has established a standalone database of location information -- this data is not integrated into our provisioning systems, but has been developed for CAF II location reporting
  - For all known locations, we have a spreadsheet line item for every 911 record, every postal address, and every other location record available
- These records are of varying degrees of utility – for example, postal records contain a range of information that may or may not yield accurate results using apps that assign addresses to specific CBs and generate Lat/Long information

# New Hampshire Locations Finding

- The CAF II model assigned 2,479 eligible CBs in New Hampshire to FairPoint
- New Hampshire does not permit access to 911 data
- The US Post Office does not provide any postal information
- FairPoint's sole location data source for New Hampshire is commercial postal addresses
- The FairPoint location analysis failed to find any customer location information for 850 eligible New Hampshire CBs, even though the Census Bureau finds household data associated with each CB

# Examples of Address Match Issues

- “15 Desjardon Rd.” vs. “16 Desjardon Rd.”
- “9 St. Peter St.” vs. “St. Peter Rd.”
- “445 US Route 1” vs. “445 US Hwy 1”
- “1001 S. Perley Brook Rd.” vs “1001 N. Perley Brook Rd.
- “134 Lakeview Rd.” vs. “134 Lake View Dr.”
- “254 Main St.” vs. “254 N. Main St.”
- “121 Pidgeon Rd.” vs. 121 Pidgeon Rd W”
- Post Office Box Numbers

# Example NH CB 230179651001170

- FCC shows 14 locations unserved
- FCC shows cost for CB to be \$160.63/location yielding CAF II support of \$18,325.93 per year
- Commercial postal DB shows no addresses with greater than 90 reliability
- Census Bureau shows 15 household units
- Area of CB is 6073983, which is about one-quarter square mile

# Example NH CB 230179651001178

- FCC shows 2 locations all unserved
- FCC shows cost for CB to be \$84.45/location yielding CAF II support of \$766.71 per year
- Commercial postal DB shows no addresses with greater than 90 reliability
- Census Bureau shows 2 household units
- Area of CB is 22916, which is about one-half acre

# Example NH CB 230179651001179

- FCC shows 31 locations all unserved
- FCC shows cost for CB to be \$101.76/location yielding CAF II support of \$18325.93 per year
- Commercial postal DB shows no addresses with greater than 90 reliability
- Census Bureau shows 38 household units
- Area of CB is 12340820, which is about half a square mile

# Upgrading Facilities Does Not Ensure Location Identification

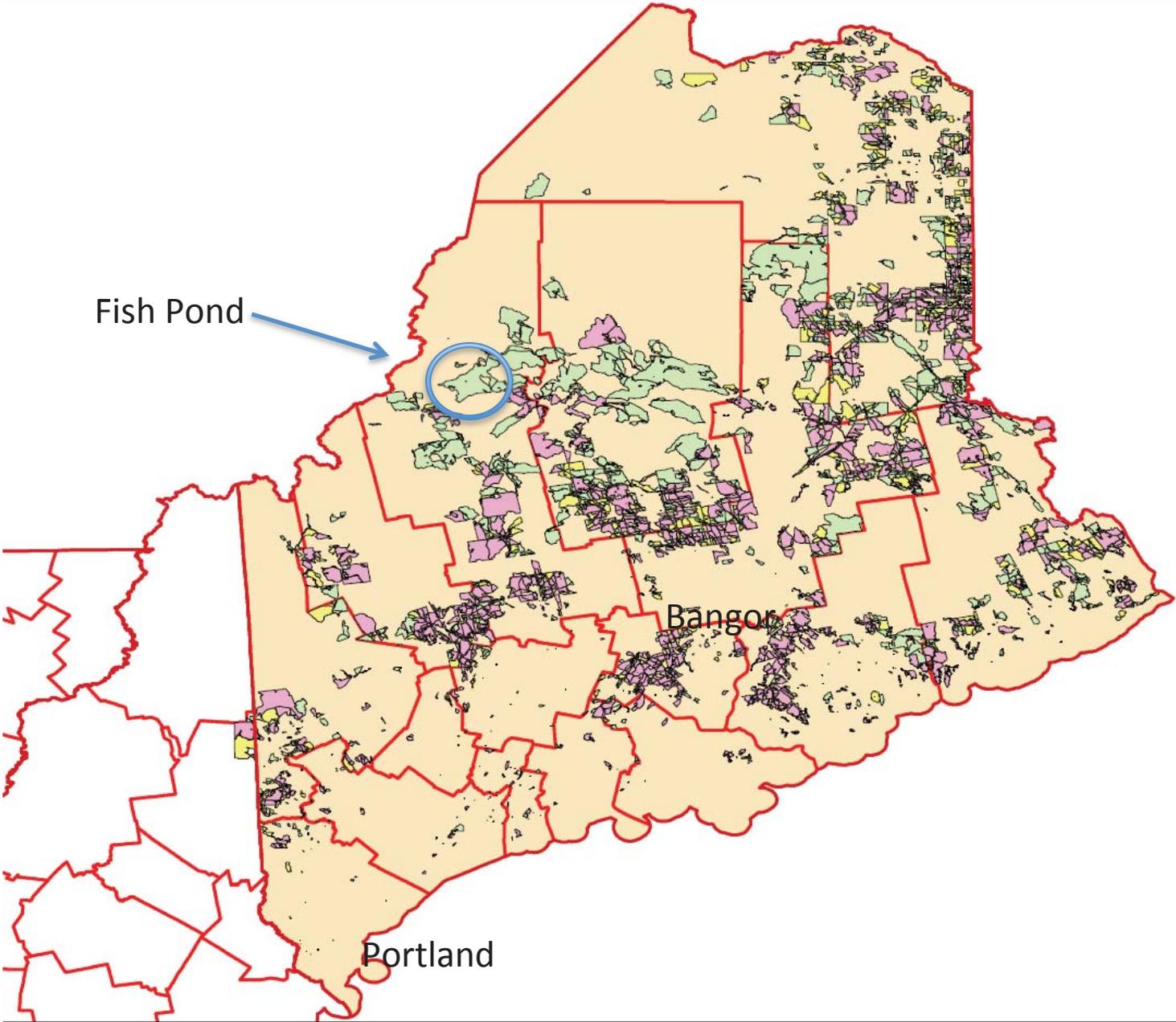
- Upgrading facilities to provide CAF II qualifying broadband generally includes extending fiber to a new DSLAM but not to the residence
  - All subscribers currently served by copper that are within 6000 ft. of the DSLAM will have access to 10/1 Mbps service (depending on technology deployment)
  - No customer technician will visit locations subtending the new DSLAM -- the tech may never even step foot into the CB in order to upgrade its service to 10/1 Mbps

# FairPoint's Proposed Solution

- Where USPS and other known sources of data are adequate (*i.e.*, in Vermont and other non-NNE states), FairPoint can rely on this information for location reporting
- Where FairPoint does not have reliable and complete Lat/Long information (*e.g.*, ME, NH) FP should be permitted to refer to 2010 Census Bureau housing unit count as proxy for specific locations served by FP, provided FP can certify it serves 100% of the CB

# Housing Unit Count Should Be Permitted Under Reporting Obligation

- For Maine & New Hampshire, no other reasonably complete data source exists
  - FP would certify to its broadband coverage as required under the rules (*i.e.*, certify it has deployed facilities meeting the Section 54.309 requirements to 100% of unserved locations identified by CACM)
  - FP would calculate maximum loop length in each CB and certify broadband availability based on the technology deployed
  - In CBs where FP has deployed broadband to less than 100% of locations, it would provide lat/long data for those locations to which it has deployed qualifying broadband

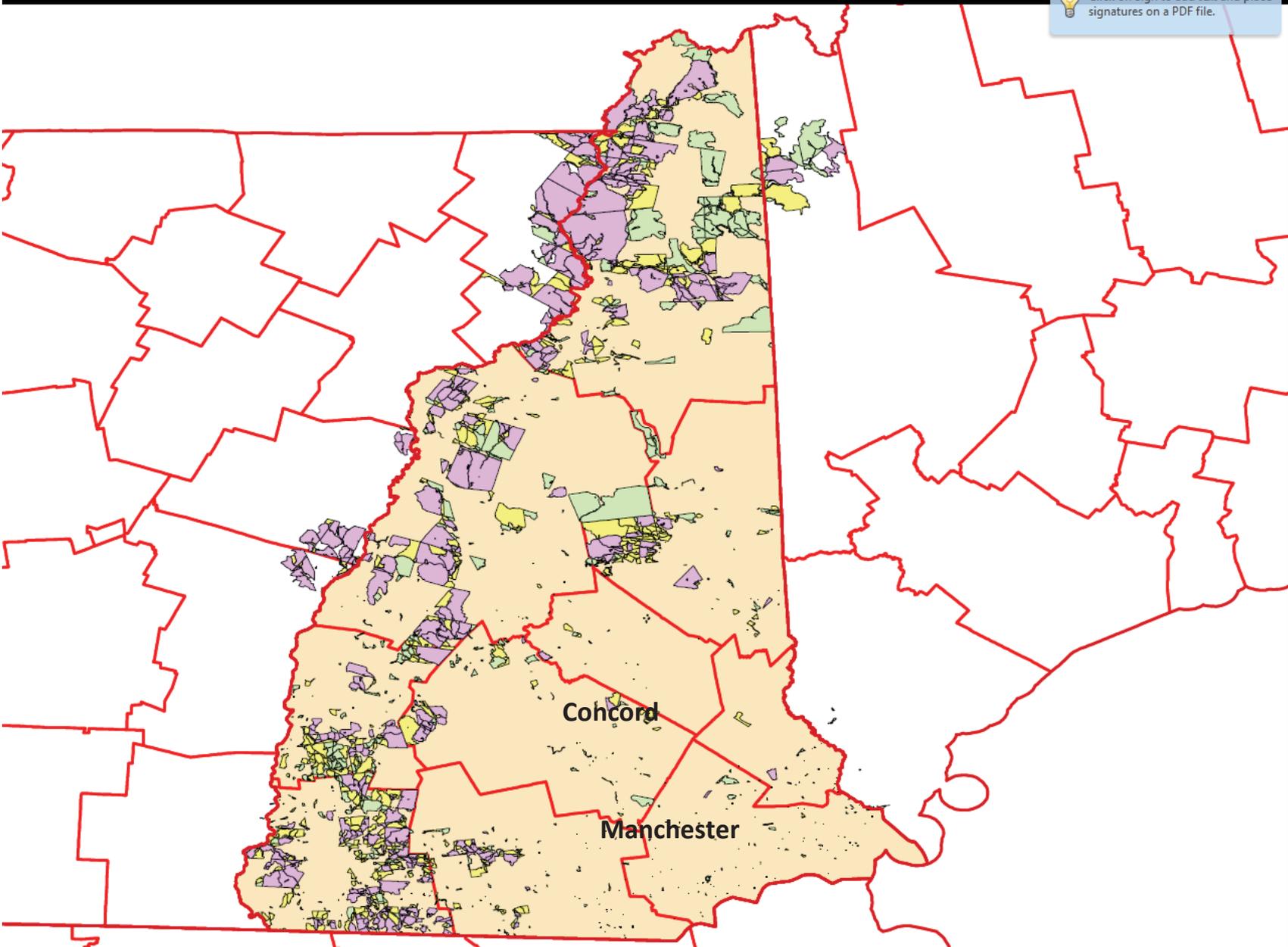


Fish Pond

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