

Questions Received during the Webinar, “Using E-File to Access the 2016 FCC Form 499-A”

Presented Thursday, March 10, 2016, at 3:00 PM EST

A recording of the event is available in the [Online Learning Library](#).

Questions Received	Responses
<p>Browser compatibility or recommendation? With 499A but not 499Qs, I have pop-up issues with Firefox and have to use IE instead.</p>	<p>Whatever works is what we use here. Your choices include IE, Chrome, Firefox, Safari, and Edge.</p>
<p>Bundled services refers to a package of TV, Internet, and phone, correct?</p>	<p>Yes, that's one definition. A package that has only two of those services would also be considered a bundle.</p>
<p>Can you cover Category 2 filing?</p>	<p>This webinar is meant to cover filing the FCC Form 499-A. Unfortunately, we won't be able to cover Schools and Libraries topics.</p>
<p>Do we have to have an annual certification when nothing has changed? If we didn't get a current one for this year, do we treat as an end user or can we go by the last year?</p>	<p>All filers must file a 499A, every year, even if nothing has changed. If you don't file, you will be charged a late filer fee. You must get a certification every single year from every customer you intend to treat as exempt.</p>
<p>For our schools who receive E-Rate funding to assist with a percentage of their bill, if we are invoicing our schools only the undiscounted portion and USAC the discounted portion, do we report both revenues or just the amount we actually invoice the school?</p>	<p>Both</p>
<p>Fred mentioned that carriers need to report services that are billed and not those that are not billed. Does that mean that if we don't bill our customers for an amount, then we don't need to report the revenue?</p>	<p>That is correct.</p>
<p>Gross billed revenues? What about revenue that is not related to IVoIP services in any way?</p>	<p>Non-telecom revenue goes on line 418. It is not assessable, by which we mean that you do not pay USF on anything on line 418.</p>
<p>I have some customers that are filers/contributors, but all of their circuits are intrastate. Do you want that revenue</p>	<p>If you've verified that they're contributors following the FCC's safe harbor procedures, put that revenue in block 3.</p>

reported in Block 3 or Block 4?

If a carrier who states that they are exempt, if they purchase local phone service from me the ILEC, we should bill them the SLC and FUSC, correct.

If a carrier states that they are exempt and they have proven that by providing you the documentation requested by the FCC safe harbor, then you do not charge them FUSF. FUSF has no bearing on whether you charge them SLC.

If our USAC dollars are flowing thru NECA, does it still go on line 308?

Yes

If we are "billing" ourselves for DSL service to provide Internet and Video, do I report that in the Wholesaler or End User Revenue Section? Previously our Subsidiary was the ISP provider and we put it into end user since they were not a contributor - Now our company is providing Internet and Video below the line. I know the revenue from those services will be non-telecom but should the regulated DSL service be included in End User since we directly contribute to USAC each month?

This question requires customer specific information in order to help us better understand the question. Please contact us at form499@usac.org

If we are charging customers credit card, for prepaid services, but no calling card is issued, are we reporting these under 411-413?

Prepaid calling cards go on line 411; postpaid calling cards go on line 413.

If we have \$15,000 in gross billed revenue we are still classified as de-minimus, correct?

If that is all of your revenue for the entire year, then yes.

If we offer a promotion to our customers of say 25% discount per month, we would not include that 25% in Gross Billed Revenues, correct?

That is correct, though in the case of bundled products please read the FCC's requirements for apportioning revenue from bundled products on pages 33 - 34 of the 2016 Instructions.

If you are a LTE in Rural America (LRA), your end users are other LRA (carriers) who have the end users and you have no end user. Are we "exempt" then?

If you are only providing wireless internet service then your revenues should be reported on Line 418 which is not subject to USF. However, if service is wireless roaming including voice then you will need to report it on line 309 (carrier's carrier) or 409 (end user) which is subject to USF.

If you enter something incorrectly, and submit for officer approval. Can an officer kick the form back to you to make and adjustment?

Yes! Until the officer approves, you should be able to make changes on the form (disclaimer: up until a certain date...there will be filing limits after the April 1 deadline)

If you have regulated bad debt. Can you jurisdictionalize based upon only the regulated revenues on line 419?

You can allocate bad debt based on revenues reported on lines 419/420

In my case our company is located on a territory of the US so our intrastate will be calls inside our territory, interstate will be calls to outside our territory to any of the continental states and international calls will be outside US territories and states. Correct?

Yes, that is correct.

Is an Ethernet based intrastate point to point service considered non-telecom or private line service?

It's considered private line service

Is there a form I could be looking at to follow along with the narrator?

If you are logged in to the webinar, the handout can be found under 'Handouts' in the webinar control panel.

Is there a specific format or template for a traffic study available somewhere to ensure compliance with data necessary?

There are instructions for the traffic study in the Instructions to the form on page 41.

Just to reconfirm for the example of the T-1, the company using T-1 for 100% Internet is not subject to FUSF Reasonable exemption since T-1 used for 100% Internet is not subject to any FCC fees including FUSF?

My officer name is not getting populated on the 499-Q report after it has been certified. Is there something wrong with my officer's profile?

Please call Customer Operations at (888) 641-8722,

Should Line 308 include an incumbent LECs CAF support revenue too?

Yes

So if we don't have reseller certifs of filer ID, we file revenue as end-user?

That is correct.

So if we don't receive an annual certification, those revenues need to be reported as End User revenue instead of reseller revenue?

That is correct.

So this 499A needs to match a carrier's Balance sheet for the year?

Yes

This is a question regarding end user revenues when you get to that point: Would a hosted voice solution delivered via IP and including unlimited local and LD, be considered interconnected VoIP revenue? And how might this be reported differently if there was one flat fee for the local and LD, or the local and LD were split into two separate charges? Would the safe harbor percentage be applied to just the unlimited LD charges if they are billed separately?

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We are a non-connected VoIP wholesale company with the majority of our revenue coming from international providers for calls which originate and terminate outside of the US. Do we need to breakout on a different those US customers for whom we have an exempt certificate?

This question requires customer specific information in order to help us better understand the question. Please contact us at form499@usac.org

We are a reseller of services how do we categorize our line 105

Check off the services you resell.

We are located in a US Territory. All calls outside of our area code (684) is considered International (even to the US). Which category do we use, Interstate or International?

For the purposes of the FCC Form 499-A, calls from a territory to another territory or a state (or DC) are considered interstate.

We do not own payphones, but collect payphone surcharges. What line do the surcharges get reported?

Line 306

We offer only LTR mobile communications. We don't have VOIP or telephone services. Why do we have to contribute to the fund?

Wireless internet is not subject to USF.

We provide data cabling for schools this includes wire and connections where do we report revenue on 499-A?

This question requires customer specific information in order to help us better understand the question. Please contact us at form499@usac.org

We provide wholesale directory assistance services to carriers who, in turn, assess USF on their end-user customers. Because our customers are carriers, we do not have USF-assessable end-user customers. We use fast Ethernet ISP circuits for connectivity in our backbone network and to connect to our carrier customers. I believe that we should

You may not be considered a direct contributor but you are still required to pay USF to your underlying carrier.

be exempt from USF charges from our ISP vendors and that we are not a contributor because we have no end users. Am I correct?

We will have standalone hosted pbx software appliance and separate optional sip trunking package. A user may use the software appliance only. Is the software appliance subject to USF?

This question requires customer specific information in order to help us better understand the question. Please contact us at form499@usac.org

We will sell a DS1 line to a customer who resells to their customers an internet line. We pass through USF as an end user. Is this correct?

Yes, if the DS1 is a telecom product

What do we fill in if NECA pays our regulatory fee on our behalf?

This question requires customer specific information in order to help us better understand the question. Please contact us at form499@usac.org

What if a company purchases a t-1 from you and are using it to provide cell service would this co be considered a reseller even though they don't sign the reseller certification?

There's a difference between a reseller, which is a company that purchases services from you to resell and a company that has certified to you that they are a direct contributor to USAC and you should report their revenue in block 3. Not all companies that resell your services will certify that they are USAC direct contributors. If they are not direct contributors, their revenue goes in block 4 and they are considered your end user.

What is the exact revenue requirement/threshold for de minimis filing?

For calendar year 2015, filers that report less than \$68,932.88 of combined interstate and international revenues on Line 423, columns (d) and (e) of the 2016 FCC Form 499-A will be considered *de minimis* for 2015.

What is the reason for the requirement that there must be an agent in Washington DC?

It's an FCC requirement. The FCC Form 499-A collects a lot of information that isn't strictly related to USF, and this is one of those bits of information.

What line items relate to Interconnected VoIP providers? We went through that slide too quickly.

404.4, 404.5, and 414.2, You can download the slides from the presentation under the 'Handout' section in the Control panel of this presentation. They will also be loaded to the Contributors page on the web page.

What type of revenue is Directory Assistance fees?

It goes on line 413.

Will just the presentation slides (without recording) be available after the presentation?

The presentation slides are available now, under the 'Handouts' tab. They will also be posted to the Contributors webpage on the USAC.org site.

Will we be able to replay this? It is very fast.

Yes. The recorded webinar will be loaded to the Contributor webpage after today.

Would like to clarify on reseller of services, line 105. We are also a reseller only, local and toll. Are we also considered a CAP/CLEC also? Or just a local and toll reseller?

You can choose Local Reseller and Toll Reseller.

Would revenues for dark fiber be reported and, if so, where?

Those are considered non-telecom and are reported on line 418.

Would you report NECA Settlement Revenue that is not Lifeline or High Cost on line 418.3?

No, this revenue should not be reported on the FCC Form 499-A

You didn't mention line 112, "List all trade names used in the past 3 years in providing telecommunications" This information is then reported on the FCC's 499 filer website and is a useful tool to determine if a customer (or a previous iteration of a customer) is a current 499 filer. If you could do a public service announcement in this line, that would be great! Thanks.

Correct, Line 112 does require companies to list all trade names used while providing telecommunication services in the past 3 years.