

USAC High Cost Program

USF Best Practices

March 16, 2011



Problems

- Duplicate lines
- Reported in the incorrect rate Zone
- Misclassified as to whether single and or multi lines
- Lines' billing addresses were outside the study area
- Included an inactive line on its line-count
- Unable to provide billing system data to support official lines

Error Detection

- Customer billing line-count detail
- Subscriber listings

Best Practice Solution

- System must retain historical data of reported levels that can be retrieved or accurately recreated
- Maintain a document retention policy for customer billing and outside plant access line reports

USF Best Practices: Asset Valuation

Problems

- Lack of proper documentation
- Continuing Property Records (CPR) not posting adds (invoices) and retirements in a timely manner
- Lack of consistent periodic reviews
- Unable to provide invoices and proper supporting documentation to support COE for audit sampling
- Did not maintain documentation for write offs or expense capitalization

USF Best Practices: Asset Valuation

Error Detection

- Depreciated assets in excess of the salvage rates approved by the PSC
- Reconcile CPR balances to related General Ledger accounts

Best Practice Solution

- Implement a document retention policy to retain work order record or approved worksheets for any retirements or adjustments
- Set up a tracking system to assure updates to the CPR
- Conduct periodic reviews of CPR

USF Best Practices: Intra-Company Allocation

Problems

- Allocations conducted in a manner that is non-compliant with regulations.
- Lack of sufficient documentation as to the logic behind allocations
- Affiliates allocation factors were not supported.
- No quantitative support for the rate used for services provided for their affiliate.

USF Best Practices: Intra-Company Allocation

Error Detection

- Test pricing and costs related to transactions between Parent and its affiliates in comparison to fees paid to non-related entities

Best Practice Solution

- Recorded transactions with affiliates in accordance with FCC Rules (47 C.F.R. 32, 36)
- Utilize YTD financial data for affiliates
- Establish a system of controls

USF Best Practices: System Security

Problems

- No policies and procedures for validation of user access to computer systems
- No proper procedures or tracking system for assets and the related documentation

USF Best Practices: System Security

Error Detection

- Personnel records do not contain authorizing signature of supervisor indicating reviews performed
- Process did not determine the risk of user access being inappropriate over time due to such factors as reassignments, promotions, termination
- No serial numbers on all equipment in its accounting records that could be used to locate and identify the related item to its physical location

USF Best Practices: System Security

Best Practice Solution

- Periodic recertification of each employee's user access to ensure access remains appropriate to the users' job function
- Supervisory review signature were denoted on the review performed on users' job functions
- Establish tracking and reporting guidelines and requirements integrated with CPR tracking of adds/retirements, with periodic review of performance

USF Best Practices:

De-Regulated/Regulated Allocation

Problems

- Regulated recovery of a de-regulated asset
- Improper costs are recovered due to reporting errors to USAC
- Inconsistencies and non-compliance issues

De-Regulated/Regulated Allocation

Error Detection

- Review accounting of payroll costs for de-regulated activity
- Review sample of product codes for compliant regulated/de-regulated treatment

Best Practices Solution

- Establish compliant mapping of each regulated/de-regulated activity code to the valid general ledger account number
- Develop improved system for tracking assets and transactions
- Improve document retention and review processes periodically for regulatory compliance

USF Best Practices: Adequate Advertisement

Problems

- Not advertizing services and charges utilizing media of general distribution
- **Particular** – Did not advertise access to:
 - Emergency and operator services
 - Local and lifeline services

USF Best Practices: Adequate Advertisement

Error Detection

- Take rates on “Supported Services” at below average level
- Review of processes is unable to detect documentation of advertising of Supported Services

Best Practices Solution

- Formalize process to comply with 47 C.F.R. § 54.101’s notification requirements
- Periodic review of the annual notification in media of general distribution
- Documentation of annual notification retained

USF Best Practices: ETC Certification by Area

Problems

- Lines and revenue identified for improper study area/exchange locations
- Improper mapping

USF Best Practices: ETC Certification by Area

Error Detection

- Sample testing of the mapping of customer on borders of study area/exchange boundaries

Best Practices Solution

- Employ industry standard geo-code mapping programs to customer billing addresses for valid locating of lines
- Periodic review of customer service locations reconciled to internal network
 - **Note:** this type of geo-coding is already required for all broadband lines as per FCC Docket 07-38

USF Best Practices: Usage and Revenue Reporting

Problems

- Improper amounts are being reported to USAC and NECA which distort proper USF distribution
- No internal process for reviewing documentation supporting compliance filings

USF Best Practices: Usage and Revenue Reporting

Error Detection

- Reconcile financial and operations budgets
- Trending compliance reported amounts between periods

Best Practices Solution

- Reported network usage with Carrier Access Billing System (CABS) intercompany report
- Reported revenues from retail and wholesale customer billing
- Part 32 Account Balances in corporate financial statements supporting documentation
- Access line and plant information listed in CPR



USF Best Practices

Questions?

Form 499 and Billing

An Overview

March 16, 2011



Who MUST file the Form 499-A?

“ALL intrastate, interstate and international providers of **telecommunications** within the United States, with very limited exceptions, must file the FCC Form 499-A.”

TELECOMMUNICATIONS: (defined by FCC for FCC Form 499-A purposes)

“the transmission, between or among points specified by the user, of information of the user’s choosing, without change in the form or content of the information as sent and received.”

Who MUST file the Form 499-A?

Types of entities responsible for filing Form 499 include (but are not limited to):

- | | |
|-------------------------------------------------------------------------------------|------------------------------------------------|
| • wireless telephone, including cellular and personal communications services (PCS) | • wide area telecommunications services (WATS) |
| • paging and messaging services | • private line |
| • dispatch services | • telex |
| • mobile radio services | • telegraph |
| • operator services | • video services |
| • access to interexchange service | • satellite services |
| • special access | • resale services |
| • message telephone services (MTS) | • frame relay and ATM services |
| • subscriber toll-free services | • interconnected VoIP services |

When do you file Forms 499?

TYPE	DUE DATE	REVENUE REPORTED	FUND(S)
499A	April 1	Annual actual billed revenue	TRS, NANP, LNP & USF
499Q	May 1	3Q projected billed & collected revenue 1Q actual billed revenue	USF
499Q	Aug 1	4Q projected billed & collected revenue 2Q actual billed revenue	USF
499Q	Nov 1	1Q projected billed & collected revenue 3Q actual billed revenue	USF
499Q	Feb 1	2Q projected billed & collected revenue 4Q actual billed revenue	USF



Form 499 & Billing

Form 499 Submittals

Submitting a Form 499

E-file!

<https://forms.universalservice.org>

Existing users may log in below

E-File Sign In

User ID:

Password:

[Forgot password](#)

New users, please select from the options below:

- [New Service Provider](#)
- [New Contributor](#)

Hard Copy (mail)

FCC Form 499-Q Telecommunications Reporting Worksheet		
Quarterly Filing for Universal Service Contributors		>>> Please read instructions
Block 1: Contributor Identification Information		101
102	Legal name of reporting entity	
103	IRS employer identification number	
104	Name telecommunications provider is doing business as	
105	Holding company [All affiliated companies should show same name here.]	
106	FCC Registration Number (FRN)	
107	Complete mailing address of reporting entity's corporate headquarters	
Block 2: Contact Information		
108	Person who completed this worksheet	First MI
109	Telephone number of this person	() -
110	Fax number of this person	() -
111	Email of this person	
112	Billing address and billing contact person: [Bills for Universal Service contributions will be sent to this address.]	

HARD COPY

- Officer signs Form 499 (certifying information submitted)
- Mail to USAC
- Forms received are date-stamped **(form must be received by USAC by the due date or the form is late!)**
- Form data entered into USAC's E-File System
- Data doubled-checked by Form 499 analyst to ensure accuracy

ONLINE E-File


- Log in to E-File
- Prepare the Form 499
- Officer “certifies” information is correct (with electronic signature)
 - User ID (batch ID)
 - Date certified (postmark & receive dates)
- No hard copy required

ONLINE E-File System...Advantages!

- Pre-populates all non-financial data from previous filings.
- Has automated checks and helpful hints to help preparers file their form accurately and in compliance with FCC instructions.

his person	(333) - 333-3333	
son	ftheobald@usac.org	
nd billi		
l Servic		
address		
historica		
l reven		
August 1	April 1 - June 30	October 1 - December 31
November 1	July 1 - September 30	January 1 - March 31 (following calc
es with no allowance or	Total	Interstate


Adobe Reader

 Please note that Column B (interstate revenue) plus Column C (international revenue) can not be more than the value in Column A (intrastate, interstate and international revenue).

OK

Standard Form 499 E-mails:

- **Form 499 Notice** – notifies filers of upcoming filing due dates and recently issued FCC orders.



Form 499-Q is due May 3, 2010 to USAC

FCC rules require all telecommunications carriers providing interstate and international telecommunications services to contribute (with limited exceptions) to the Universal Service Fund (USF) and file a Telecommunications Reporting Worksheet (FCC Form 499-Q).

[Click here for a list of companies for which you have submitted prior filings.](#)

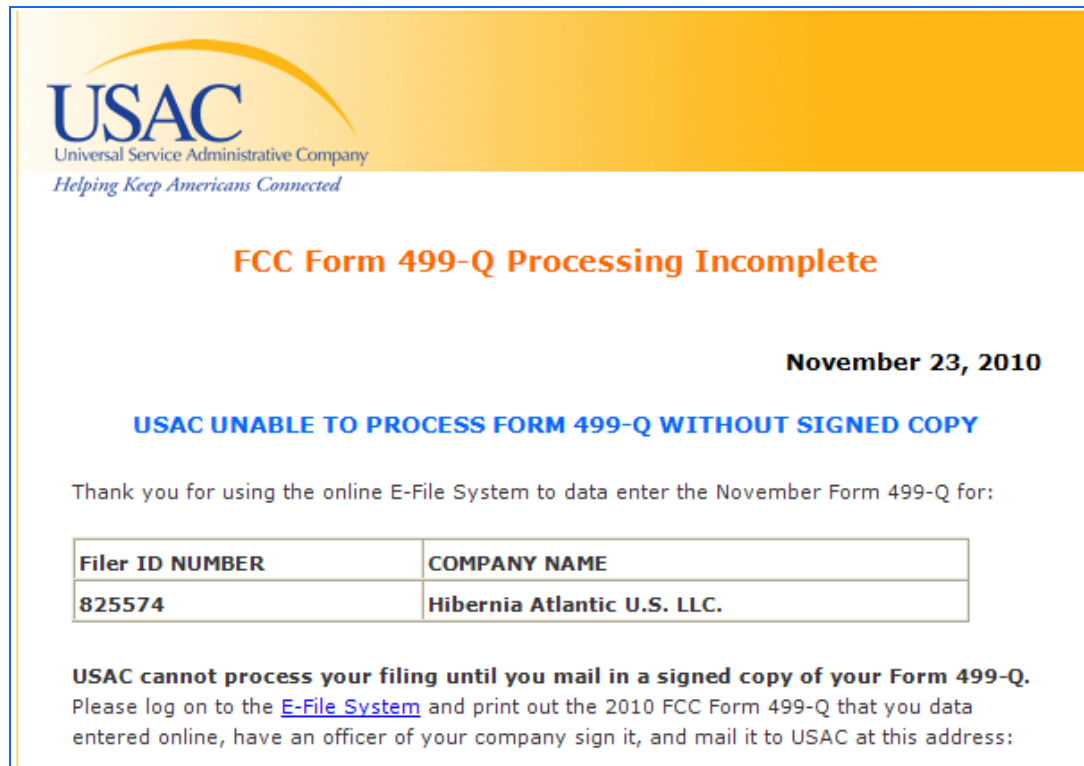
How You Can File

Online Filing & Certification – USAC provides an [E-file portal](#) to file FCC Form 499 online, saving you time and ensuring timely filing. The many benefits of online filing include auto-population of non-financial data, instant form certification, auto-checking throughout the form, and access to helpful hints. For help with your E-file user name and password, please contact USAC Customer Operations at **888-641-8722**.

Form 499 Correspondence

Standard Form 499 E-mails:

- **Non-responder Notice** – notifies filers that USAC has not received their latest Form 499 filing.



The image shows a screenshot of an email notification from USAC. The header features the USAC logo and tagline. The main subject is "FCC Form 499-Q Processing Incomplete" in orange text. The date is "November 23, 2010". The body text states "USAC UNABLE TO PROCESS FORM 499-Q WITHOUT SIGNED COPY" in blue. Below this, it says "Thank you for using the online E-File System to data enter the November Form 499-Q for:". A table follows with two columns: "Filer ID NUMBER" and "COMPANY NAME". The first row contains "825574" and "Hibernia Atlantic U.S. LLC.". The final text instructs the filer to mail a signed copy of the form to USAC.

USAC
Universal Service Administrative Company
Helping Keep Americans Connected

FCC Form 499-Q Processing Incomplete

November 23, 2010

USAC UNABLE TO PROCESS FORM 499-Q WITHOUT SIGNED COPY

Thank you for using the online E-File System to data enter the November Form 499-Q for:

Filer ID NUMBER	COMPANY NAME
825574	Hibernia Atlantic U.S. LLC.

USAC cannot process your filing until you mail in a signed copy of your Form 499-Q.
Please log on to the [E-File System](#) and print out the 2010 FCC Form 499-Q that you data entered online, have an officer of your company sign it, and mail it to USAC at this address:

Form 499-Q 1-2-3 Quick Check

Block 3: Contributor Historical and Projected Revenue Information

1

113	Year of historical revenue information																											
114	Indicate which quarterly filing this represents	<table border="0"> <tr> <td><input type="checkbox"/></td> <td>February 1</td> </tr> <tr> <td><input type="checkbox"/></td> <td>May 1</td> </tr> <tr> <td><input type="checkbox"/></td> <td>August 1</td> </tr> <tr> <td><input type="checkbox"/></td> <td>November 1</td> </tr> </table>	<input type="checkbox"/>	February 1	<input type="checkbox"/>	May 1	<input type="checkbox"/>	August 1	<input type="checkbox"/>	November 1	<table border="0"> <tr> <td><u>Filing due</u></td> <td><u>Historical revenues for</u></td> <td><u>Projected revenues for</u></td> </tr> <tr> <td></td> <td>October 1 - December 31 (prior year)</td> <td>April 1 - June 30</td> </tr> <tr> <td></td> <td>January 1 - March 31</td> <td>July 1 - September 30</td> </tr> <tr> <td></td> <td>April 1 - June 30</td> <td>October 1 - December 31</td> </tr> <tr> <td></td> <td>July 1 - September 30</td> <td>January 1 - March 31 (following calendar year)</td> </tr> </table>	<u>Filing due</u>	<u>Historical revenues for</u>	<u>Projected revenues for</u>		October 1 - December 31 (prior year)	April 1 - June 30		January 1 - March 31	July 1 - September 30		April 1 - June 30	October 1 - December 31		July 1 - September 30	January 1 - March 31 (following calendar year)		
<input type="checkbox"/>	February 1																											
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	April 1 - June 30	October 1 - December 31																										
	July 1 - September 30	January 1 - March 31 (following calendar year)																										

2

Historical billed revenues with no allowance or deductions for uncollectibles. See instructions.		Total Revenues (a)	Interstate Revenues (b)	International Revenues (c)
115	Telecommunications provided to other universal service contributors for resale as telecommunications or as interconnected VoIP			
116	End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues			
117	All other goods and services		Column (b) and (c) not requested for Lines 117 and 118	
118	Gross-billed revenues from all sources [sum of above]			
119	Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues			
120	Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues			

3

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.	
122	Signature

499-Q 1-2-3 Quick Check

1 Form 499-Q Filing Identifier (Lines 113 & 114)

- Line 113:** year of historical revenue should be year that the filing was due (exception: February 499Q year of historical revenue will be the prior year)
- Example:** May 2010 Form 499Q Line 113 will be 2010

Block 3: Contributor Historical and Projected Revenue Information

113	Year of historical revenue information	2010		
114	Indicate which quarterly filing this represents	<input type="checkbox"/> February 1 <input checked="" type="checkbox"/> May 1 <input type="checkbox"/> August 1 <input type="checkbox"/> November 1	<u>Filing due</u> <u>Historical revenues for</u> October 1 - December 31 (prior year) January 1 - March 31 April 1 - June 30 July 1 - September 30	<u>Projected revenues for</u> April 1 - June 30 July 1 - September 30 October 1 - December 31 January 1 - March 31 (following calendar year)

Form 499-Q 1-2-3 Quick Check

1 Form 499-Q Filing Identifier (Lines 113 & 114)

- Ensure correct filing has been checked off

Block 3: Contributor Historical and Projected Revenue Information

113	Year of historical revenue information	2010																						
114	Indicate which quarterly filing this represents	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><u>Filing due</u></td> <td><u>Historical revenues for</u></td> <td><u>Projected revenues for</u></td> </tr> <tr> <td><input type="checkbox"/></td> <td>February 1</td> <td>October 1 - December 31 (prior year)</td> <td>April 1 - June 30</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>May 1</td> <td>January 1 - March 31</td> <td>July 1 - September 30</td> </tr> <tr> <td><input type="checkbox"/></td> <td>August 1</td> <td>April 1 - June 30</td> <td>October 1 - December 31</td> </tr> <tr> <td><input type="checkbox"/></td> <td>November 1</td> <td>July 1 - September 30</td> <td>January 1 - March 31 (following calendar year)</td> </tr> </table>	<input type="checkbox"/>	<u>Filing due</u>	<u>Historical revenues for</u>	<u>Projected revenues for</u>	<input type="checkbox"/>	February 1	October 1 - December 31 (prior year)	April 1 - June 30	<input checked="" type="checkbox"/>	May 1	January 1 - March 31	July 1 - September 30	<input type="checkbox"/>	August 1	April 1 - June 30	October 1 - December 31	<input type="checkbox"/>	November 1	July 1 - September 30	January 1 - March 31 (following calendar year)		
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<input type="checkbox"/>	November 1	July 1 - September 30	January 1 - March 31 (following calendar year)																					

Form 499-Q 1-2-3 Quick Check

2 End User Interstate & International Revenues (Lines 116, 119, & 120)

- Do you have End User Interstate and/or International Revenues?
- ✓ **YES:** check to make sure revenues are listed on lines 116, 119, and 120 and that numbers are fairly similar (~+/-30%)

Line 116	\$350,000.00	\$10,000.00
	Column (b) and (c) not requested for Lines 117 and 118	
Line 119	\$300,000.00	\$9,000.00
Line 120	\$290,000.00	\$8,900.00

Form 499-Q 1-2-3 Quick Check

2 End User Interstate & International Revenues (Lines 116, 119, & 120)

- Do you have End User Interstate and/or International Revenues?
- ✓ **NO:** check to make sure you have reported **\$0.00** on lines 116, 119, and 120.

Line 116



Line 119



Line 120



\$0.00	\$0.00
Column (b) and (c) not requested for Lines 117 and 118	
\$0.00	\$0.00
\$0.00	\$0.00

Form 499-Q 1-2-3 Quick Check

2 End User Interstate & International Revenues (Lines 116, 119, & 120)

- If you have reported revenue on Line 116 but have **stopped** providing End User Interstate and/or International services, you should report **\$0.00** on Lines 119 and 120.

Line 116	\$500,000.00	\$5,000.00
	Column (b) and (c) not requested for Lines 117 and 118	
Line 119	\$0.00	\$0.00
Line 120	\$0.00	\$0.00

Form 499-Q 1-2-3 Quick Check

2 End User Interstate & International Revenues (Lines 116, 119, & 120)

- If you have reported \$0 on Line 116 and are going **to start** providing End User Interstate and/or International services, you should report revenues on Lines 119 and 120.

Line 116	\$0.00	\$0.00
	Column (b) and (c) not requested for Lines 117 and 118	
Line 119	\$50,000.00	\$5,000.00
Line 120	\$45,000.00	\$4,000.00

Form 499-Q 1-2-3 Quick Check

3 Signature (Line 122)

- Make sure your Company Officer has signed the Form 499Q .
- Be sure you are sending USAC the original – **NOT** a photocopy.

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122 Signature



Form 499 & Billing

Who uses Form 499?

Who uses Form 499?

Universal Service Fund (USF)

Telecommunications Relay Service (TRS)

- A telephone service allowing persons with hearing or speech disabilities to place and receive telephone calls.

North American Numbering Plan (NANP)

- Integrated telephone numbering plan serving 19 North American countries that share its resources.

Local Number Portability (LNP)

- LNP allows consumers to transfer an existing landline telephone number from one carrier to another with some limitations (Form 499-A only)

Federal Communications Commission (FCC)

- FCC Regulatory Fees for interstate telecommunications providers



Form 499 & Billing

USF Billing

Background

- FCC sets quarterly contribution factors based on cumulative revenue reported by carriers on Form 499-Q
- Carriers are permitted to pass USF charges through to customers
- Revenue generated must be reported on Form 499
- FCC sets a quarterly circularity factor to reduce contribution amounts (prevents assessing further USF fees on pass-through charges)
- Circularity factor is same for all carriers (whether or not they pass-through charges to customers)

Quarterly Telecommunications Worksheet (Form 499-Q)

- Filed by carriers
- Used to determine carriers' monthly USF contribution obligation
- Obligations assessed based on projected, collected end-user interstate and international revenues (Line 120)

De Minimis: Carriers with annual contributions < \$10,000 are not required to contribute.

- Form 499Q – USAC uses FCC Contribution and Circularity Factors to determine *de minimis* status.
- Form 499A – USAC uses average of the FCC Contribution and Circularity Factors to determine *de minimis* status.

De Minimis

- **Monthly Charges:** *De minimis* test performed on both Form 499-Q (for current quarter) & latest Form 499-A.
- If *de minimis* on both forms, company is exempt from USF charges.
- *De minimis* test is conducted on an individual basis.
- Company needs to be *de minimis* on both their current Form 499Q and their last filed Form 499A to not to be billed by USAC.



Form 499 & Billing

True Up

Purpose of the True Up:

- Determines who was *de minimis* for prior calendar year.
 - Reverses billings associated with that status
- Compares quarterly filings to the year-end annual filing.
 - Adjusts non *de minimis* accounts for any differences in the revenue reported.

True Up process:

- Four quarters of projected, collected revenue compared to corresponding Form 499-A filing.
- **If sum of 499-Qs exceeds the 499-A:** credits are issued on July – September invoices.
- Credits calculated using average of the two lowest contribution factors and associated circularity factors in place during the quarterly billings.

True Up process:

- **If sum of 499-Qs is less than the 499-A:** charges are issued on July – September invoices.
- Charges calculated using average of the two highest contribution factors and associated circularity factors in place during quarterly billings.
- Revised 499A Forms result in recalculation of the true up.
- Resulting recalculation is compared to original true up to determine credits or adjustments due.

COMPANY: Going out of business

- Company goes out of business mid-year – not responsible for filing Form 499-A for that calendar year.

COMPANY: Sales, mergers, consolidations

- Purchasing company responsible for reporting all revenues from purchased company for complete reporting year on Form 499A unless stipulated otherwise.
- USAC uses combined Form 499Q revenues of both companies when calculating purchasing company's Form 499A True Up.



Form 499 & Billing

Audit

Form 499-A Instructions

- Filers shall maintain records and documentation to justify information reported in the Telecommunications Reporting Worksheet, including the methodology used to determine projections and allocate interstate revenues, for five years.
- Filers shall provide records and documentation to the Commission, the Administrator, or their auditors upon request.

Form 499-A Instructions

- Review by the Commission or the Administrator may cover any existing corporate records, not just those specifically maintained for the five year period.
- Entities that acquire carrier operations through acquisition of property, consolidation, merger, etc., must maintain the records of the acquired entity.

FCC Order DA 10-752

Service providers leasing or purchasing transmission from telecommunications carriers to provide wireline broadband Internet access services are not required to contribute to the USF for revenues derived from the provision of that service.

If service providers lease or purchase transmission service offered on a common carrier basis (whether from an affiliated entity or a third party) they are end users of that telecommunications service, and the telecommunications carrier providing the leased telecommunications services is obligated to contribute to the USF on those revenues.

Block 3 Revenues: Wholesale Revenues

“Reseller” is a telecommunications carrier or telecommunications provider that:

1. Incorporates purchased telecommunications services into its own telecommunications offerings.
2. Can reasonably be expected to contribute to federal universal service support mechanisms based on revenues from such offerings when provided to end users.

Private Line: Revenues

“If over ten percent of the traffic carried over a private or WATS line is interstate, then the revenues and costs generated by the entire line are classified as interstate.”

Line 418 Revenues: Non Telecommunications

Two “safe harbor” methods for allocating revenue when telecommunications and CPE/enhanced services are offered as a bundled package:

1. Report revenues from bundled telecommunications and CPE/enhanced service offerings based on the unbundled service offering prices, with no discount from bundled offering being allocated to telecommunications.
2. Contributors may elect to treat all bundled revenues as telecommunications revenues for purposes of determining their universal service obligations.

Subscriber Line Charges (SLC)

- Represent interstate portion of fixed local exchange service
- Filers without subscriber line charge revenue must identify interstate portion of fixed local exchange service revenues in column (d) of the appropriate line.

Universal Service Charges

- Any charge identified on a bill as recovering contributions to universal service support mechanisms must be shown on Line 403.
- Charges should be identified as either interstate or international revenues, as appropriate.
- Filers should report intrastate revenues on Line 403 only to the extent that actual payments to state universal service programs were recovered by pass-through charges itemized on customer bills.

Robert Binder
Director – Industry Support
High Cost / Low Income Division

To learn more, visit:
www.usac.org/fund-administration/

Please feel free to contact me regarding any questions or concerns you may have.

Rob Binder

Director – Industry Support

USAC High Cost and Low Income Programs

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E-mail: rbinder@usac.org

Website: www.usac.org

Thank you!