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High Cost
and the
Connect America Fund

Tribal Teleconference

Oct. 13, 2026

Universal Service Administrative Co.

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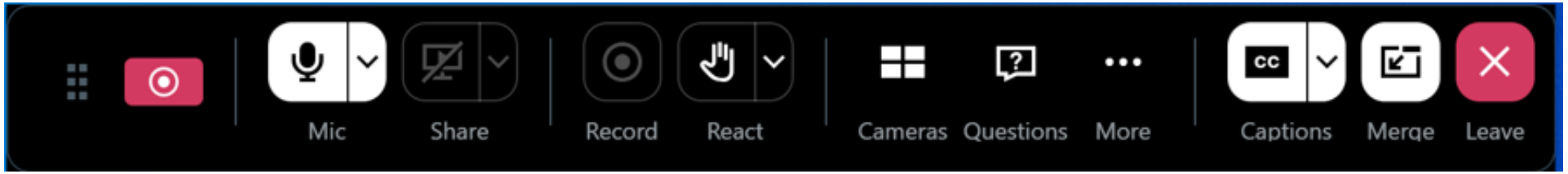

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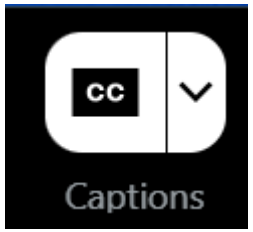

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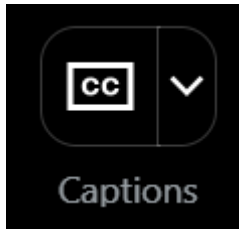

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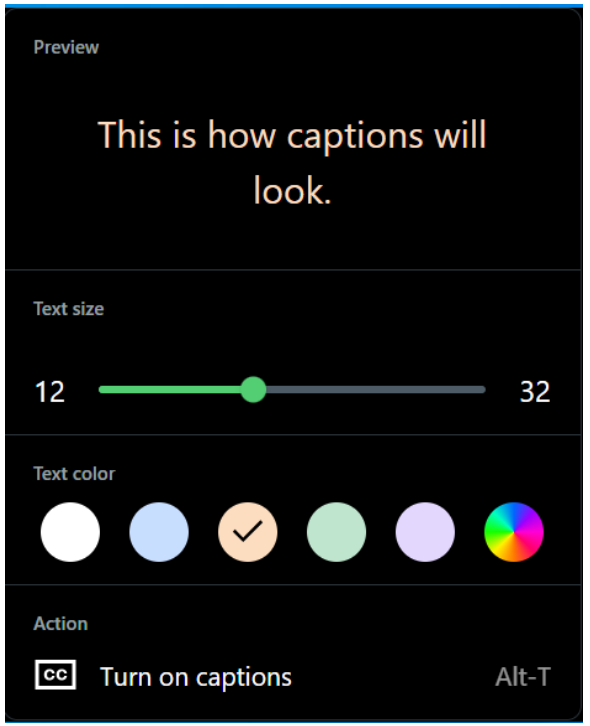

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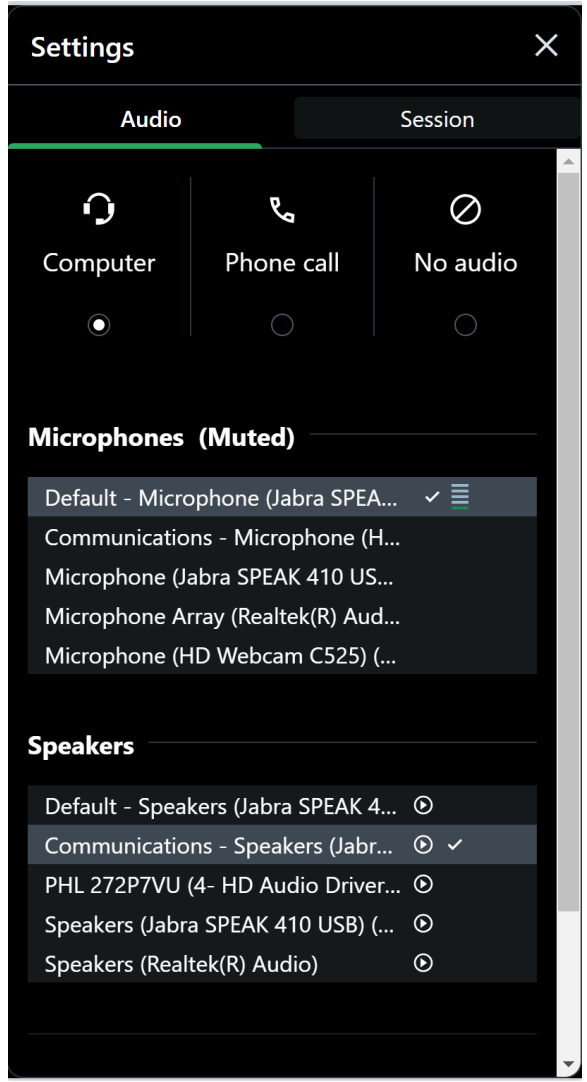

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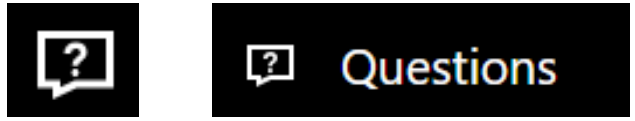

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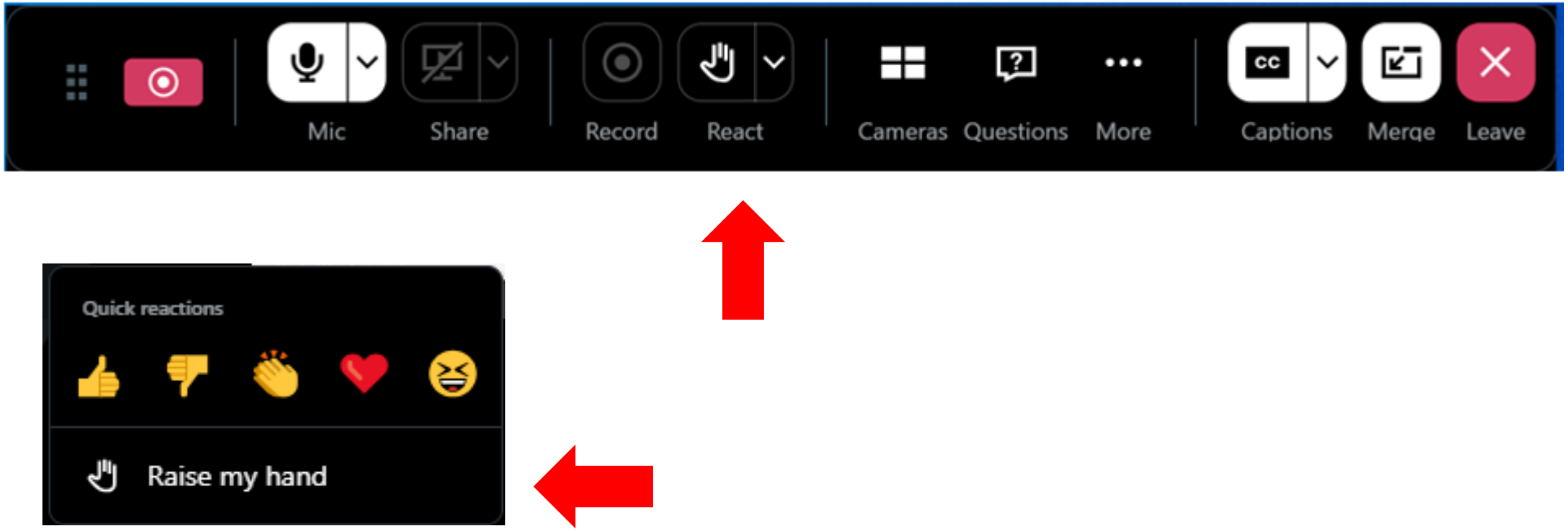

Disclaimer

To accommodate all attendees, real-time closed captions will be present during this presentation. We apologize in advance for any transcription errors or distractions and appreciate your understanding.

Please be aware that this webinar is being recorded.

Meet Our Team

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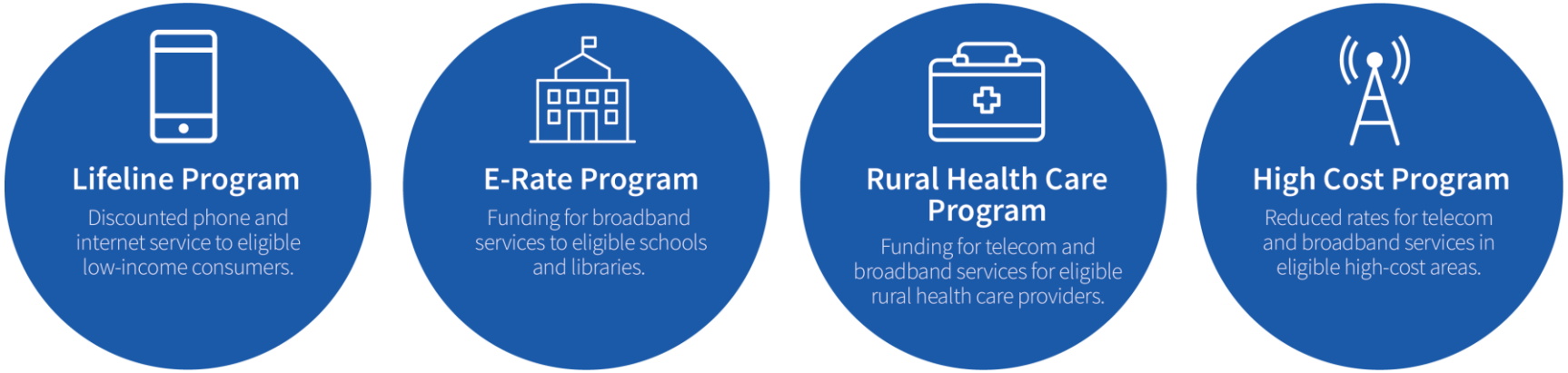
Upcoming USAC Webinars

- **E-Rate**
  - EPC Administrative Window – October 15, 2026, at 2 p.m. ET – Register.
  - Eligible Services 101 – November 3, 2026, at 2 p.m. ET – Register.
- **Rural Health Care (RHC)**
  - Post-Commitment Change Requests (HCF) – October 14, 2026, at 2 p.m. ET – Register.
  - Post-Commitment Change Requests (Telecom) – October 21, 2026, at 2 p.m. ET – Register.
- **Lifeline**
  - How to apply for Lifeline – October 14, 2026, at 3 p.m. ET – Register.
- **Service Providers**
  - New 499 Filer ID Basics – October 13, 2026, at 2 p.m. ET – Register.
- **Tribal Teleconferences**
  - Tribal E-Rate Advocacy Program (T-LEAP) Kick-Off and Info Session – October 27, 2026, at 4 p.m. ET – Register.
  - E-Rate and Tribal Teleconference – November 10, 2026, at 4 p.m. ET – Register.

Everyone. Connected.

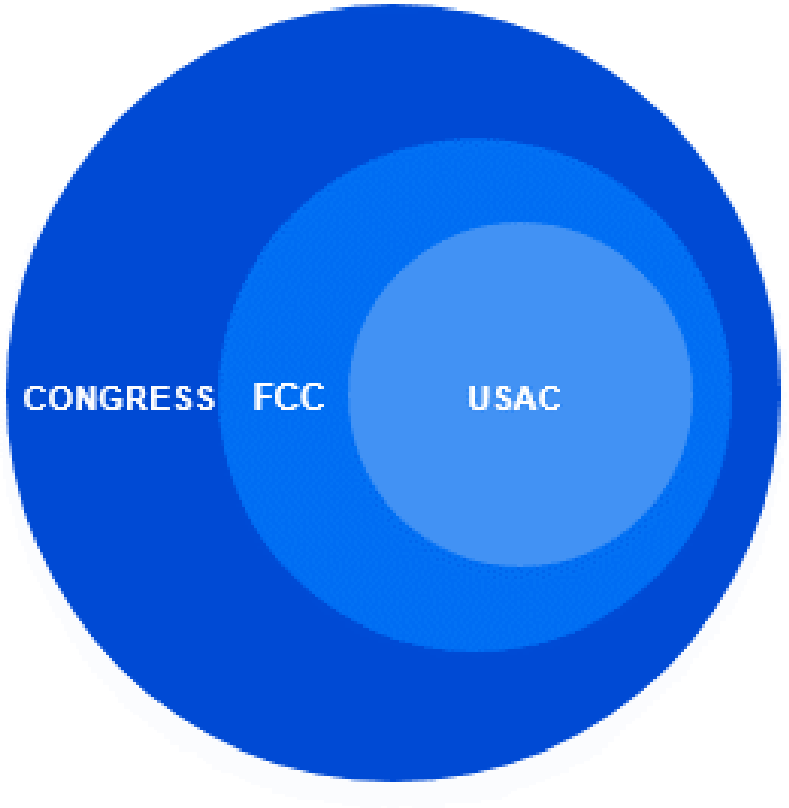
Who We Are: The Universal Service Administrative Company

- The **Universal Service Administrative Company** (USAC) is an independent, not-for-profit organization designated by the Federal Communications Commission (FCC).
- USAC is responsible for administering the **Universal Service Fund** (USF) and its four programs.
- The Universal Service Fund ensures that all people in the United States have access to quality and affordable connectivity services.



Overview: Who Makes the Rules?

- Congress directed the FCC to establish Universal Service Fund programs in the Telecommunications Act of 1996.
- The FCC sets rules and policies for the USF programs and gives direction to USAC.
- USAC is responsible for the day-to-day administration of the USF programs in accordance with FCC requirements.



Agenda

- What is High Cost?
  - Legacy and Modernized (Connect America Fund) Programs
- Participating in High Cost
  - Obtaining Eligible Telecommunications Carrier (ETC) Certification
  - Filing Form 481
  - Tribal Access to Carrier Form 481 Data
- Connect America Fund Compliance
  - HUBB Portal: Tracking Broadband Deployment
  - Verification Reviews: Confirming Broadband Deployment
  - Network Performance Testing: Measuring Broadband Speed and Latency
- Resources

What is the High Cost Program?

What is the High Cost Program?

- High Cost is the largest of the four programs that make up Universal Service Fund.
- High Cost ensures universal availability of essential telecommunications services in rural America.
- The program consists of more than 15 separate funds that distribute billions of dollars annually to carriers to provide voice and broadband service — both fixed and mobile — in rural areas that would otherwise be unserved or underserved.
  - See the High Cost Funds pages for individual fund descriptions and details.
- Legacy funds subsidize voice service to ensure universal access to basic telephone lines.
- Modernized funds - which make up the Connect America Fund – subsidize broadband to close the digital divide in communities where the market alone cannot support the substantial cost of deploying network infrastructure and providing connectivity.
- Carriers that receive High Cost funding must offer service at rates reasonably comparable to those available in urban areas.

What is the High Cost Program?

Legacy Voice Funds

- High Cost historically subsidized voice service through legacy funds that calculate support based on carrier costs.
- Legacy High Cost funds are not open to new carriers, but continue to pay out support to traditional rural telephone companies that are already participating.
- Carriers receiving legacy support are subject to USAC financial audits.

What is the High Cost Program?

Modernized Broadband Funds (Connect America Fund)

- The FCC has reformed the High Cost program through the Connect America Fund (CAF) to bring advanced network infrastructure and reliable, high-speed internet access to rural communities that might otherwise be left behind in the digital age.
- CAF consists of roughly a dozen separate funds that use incentive-based cost models and competitive bidding to award set monthly payments to carriers to deploy and maintain robust communications networks – which provide voice service and broadband at required speeds – in areas eligible for support.
- Carriers must complete deployment over a defined timeline, with interim and final deployment milestone deadlines. Carriers in funds that subsidize fixed broadband must connect a specific number of locations.
- Participating carriers include not only traditional rural phone companies, but also rural electric coops, cable operators, wireless operators, wireless internet service providers and satellite providers.
- USAC closely monitors compliance with CAF broadband build-out obligations to ensure that carriers are using support to deploy high-speed internet access that meets minimum speed and latency standards to required location counts by relevant deployment milestone deadlines in eligible rural areas.

Participating in High Cost

Obtaining Annual ETC Certification

- To participate in the High Cost program, a carrier must be certified as an Eligible Telecommunications Carrier (ETC) on an annual basis (47 CFR Section 54.314).
- State utility commissions and carriers that self certify (carriers not subject to state jurisdiction) must submit this certification to USAC by Oct. 1 every year.
- State utility commissions must certify that carriers under their jurisdiction are eligible to receive High Cost support in their state and used all support received in the proceeding calendar year only to provide, maintain and upgrade the facilities for which the support was intended and will do the same in the coming calendar year.
- Carriers that self-certify must certify that they used all High Cost support received in the proceeding calendar year only to provide, maintain, and upgrade the facilities for which the support was intended and will do the same in the coming calendar year.
- See the Annual ETC Certification resource page on the HC website for more information.

Participating in High Cost

Filing FCC Form 481

- Carriers participating in the High Cost and/or Lifeline programs must file FCC Form 481 by July 1 every year (54.313 reporting requirement)
- Form 481 collects financial and operations information used to validate carrier support.
- State officials also rely on Form 481 data to perform the annual certification of carriers under their jurisdiction.
- Information gathered includes:
  - Holding company, operating companies, affiliates and branding designations
  - Carrier ability to function in emergency situations
  - Tribal lands engagement
  - Comparability of voice and broadband rates in rural and urban areas
- Form 481 also includes three supply chain certifications:
  - Carriers must certify that no Universal Service support is being used to purchase, rent, lease, obtain or maintain any equipment or services produced or provided by any company designated by the FCC as posing a national security threat to the integrity of communications networks or the communications supply chain.
- See the Form 481 resource page on the HC website for more information.

Tribal Access to High Cost Carrier Data

Providing Tribal Access to Form 481 Data

- USAC provides Tribes with access to FCC Form 481 data submitted and certified by carriers that serve their communities using High Cost support through the 54.314 Certification Filing System in E-File. (State utility commissions also use this system to access Form 481 data and certify that carriers under their jurisdiction are eligible to participate in the High Cost program.)
- To obtain access privileges, Tribal governments should contact the High Cost division at Form481@usac.org to request an authorization form.
- Once granted access to the 54.314 system, Tribal government officials can download a zip file containing a copy of the most recent Form 481 filing data and related attachments certified by carriers that serve their communities. The system provides access to this data by Study Area Code (SAC), the unique six-digit number assigned to each carrier to identify it based on its service area.
- See the 54.314 Tribal Access Tool User Guide for help navigating the system and the Tribal Nations program page on the USAC website for more information.

Connect America Fund Compliance

- Carriers participating in modernized Connect America Fund programs are subject to an extensive oversight process to safeguard program accountability, transparency and integrity.
- This process closely monitors carrier compliance with broadband deployment obligations to ensure that carriers are using CAF support to build out high-speed internet access that meets minimum speed and latency standards to required location counts by relevant deployment milestone deadlines in rural areas eligible for funding.
- The compliance process consists of several steps:
  - HUBB Portal: Tracking Broadband Deployment
  - Verification Reviews: Confirming Broadband Deployment
  - Network Performance Testing: Measuring Speed and Latency
- Carriers may also be subject to site visit audits following final deployment milestones.

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HUBB Portal:
Tracking Broadband Deployment

HUBB Portal: Tracking Broadband Deployment

- Carriers in modernized funds with defined fixed broadband build-out obligations must file data annually with the High Cost Universal broadband (HUBB) portal showing where they deployed service using CAF support in the prior calendar year or certify “no locations” to upload (no deployment)
  - Includes annual certification to confirm that carrier’s filing activity for previous year is complete
  - Most recent annual HUBB filing deadline was March 2, 2026, for carriers to submit 2025 deployment data. Next annual HUBB filing deadline is March 1, 2027, for carriers to submit 2026 deployment data.
- For every location deployed with CAF support, HUBB collects:
  - Date of deployment and speeds available
  - Address and lat/long coordinates or location IDs from the Broadband Serviceable Location Fabric
    - Fabric is a single, standardized dataset of all locations in the U.S. where fixed broadband access is available or could be installed – Fabric assigns a unique Fabric ID to each location
    - Carriers in newer CAF programs report deployment data using location IDs from the Fabric that identify the locations where they must offer service

HUBB Portal: Tracking Broadband Deployment

- HUBB performs automated, real-time data validation checks and only accepts locations that pass:
  - Checks that lat/long of reported location fall within area eligible for funding or that Fabric Location ID is on list of locations where a carrier must deploy service
  - Checks that the location is not a duplicate of one already submitted
  - Checks that date of deployment falls within fund timeline
- HUBB tracks carrier progress toward meeting interim and final deployment milestones.
- Carriers with annual deployment milestones may face verification reviews tied to those milestones to confirm deployment to a random sample of reported locations in the months following HUBB deadline
  - Carriers that miss a deployment milestone must notify the FCC, USAC and relevant state and Tribal governments within 10 business days of the milestone deadline.
  - Carriers that miss deployment milestones are subject to increased reporting obligations and potential withholding/recovery of support

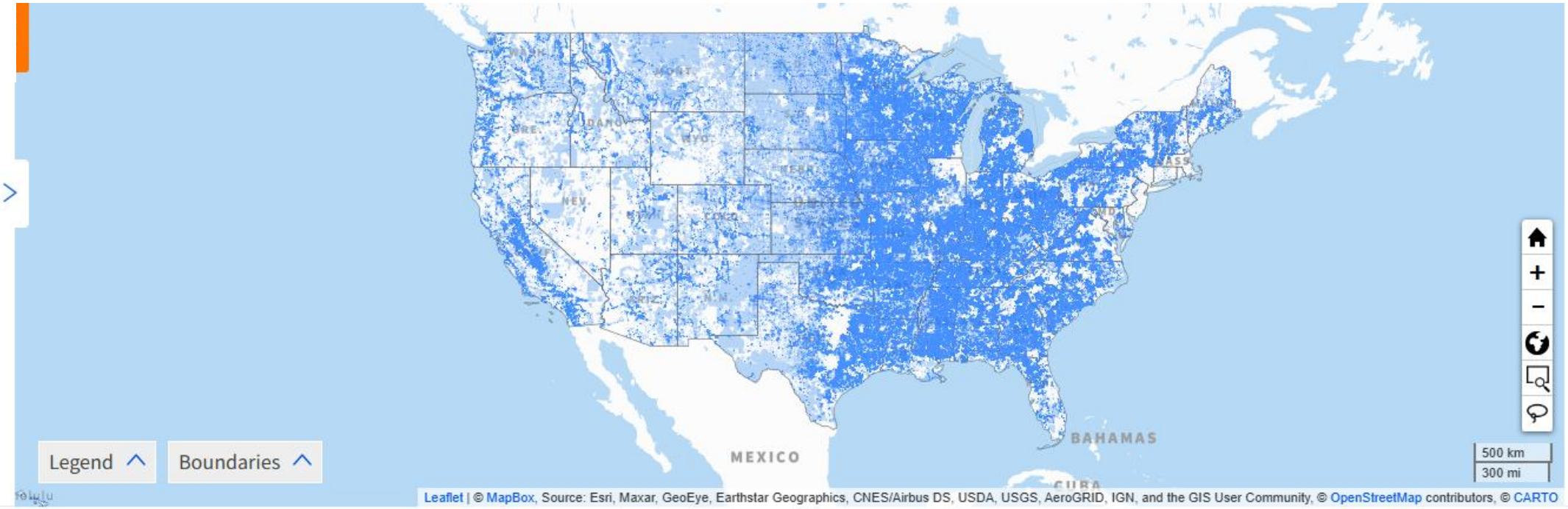
HUBB Portal: Filing by Fabric ID

- Carriers in these funds (and ACS) currently report deployment data in the HUBB using **addresses and lat/long coordinates**:
  - Connect America Fund (CAF) Phase II Auction (CAF II Auction)
  - Alternative Connect America Cost Model (Original ACAM), Revised ACAM and ACAM II
  - Connect America Fund Broadband Loop Support (CAF BLS)
  - Rural Broadband Experiments (RBE)
  - Alaska Plan
- Carriers in these funds currently report deployment data in the HUBB using **Fabric Location IDs:**
  - Enhanced ACAM
  - Rural Digital Opportunity Fund
  - Rural Digital Opportunity Fund (RDOF) and Bringing Puerto Rico Together (Uniendo a Puerto Rico) Fund and Connect USVI Fund (PR/USVI Funds) Stage 2 Fixed Support

HUBB Portal: CAF Map and CAF State Map

- The HUBB dataset is the foundation for two interactive online maps available to the public:
  - The CAF Map provides a granular, location-level view of the impact of the Connect America Fund on broadband expansion in rural America
    - Displays the geographic areas eligible for CAF support, as well as the specific fixed locations where carriers report offering mass-market, high speed Internet service funded by the program
  - The CAF State Map provides a big-picture, state-level view of the impact of the Connect America Fund on broadband expansion in rural America
    - Aggregates data for all carriers participating in the program in each state and displays, on a state-by-state basis, total deployment obligations by location count, total cumulative deployment reported so far by location count and total cumulative funding paid out to date.
  - Current maps are based on broadband deployment data certified in the HUBB as of March 6, 2026, to reflect deployment through Dec. 31, 2025.
  - CAF Map only includes deployment data reported by carriers using addresses + lat/long coordinates. CAF State Map also includes deployment data reported by carriers using Fabric Location IDs.

Connect America Fund Broadband Map



State
All States

Holding Company
Search Holding Company

Speed
All Speeds

Filing Year
All Years

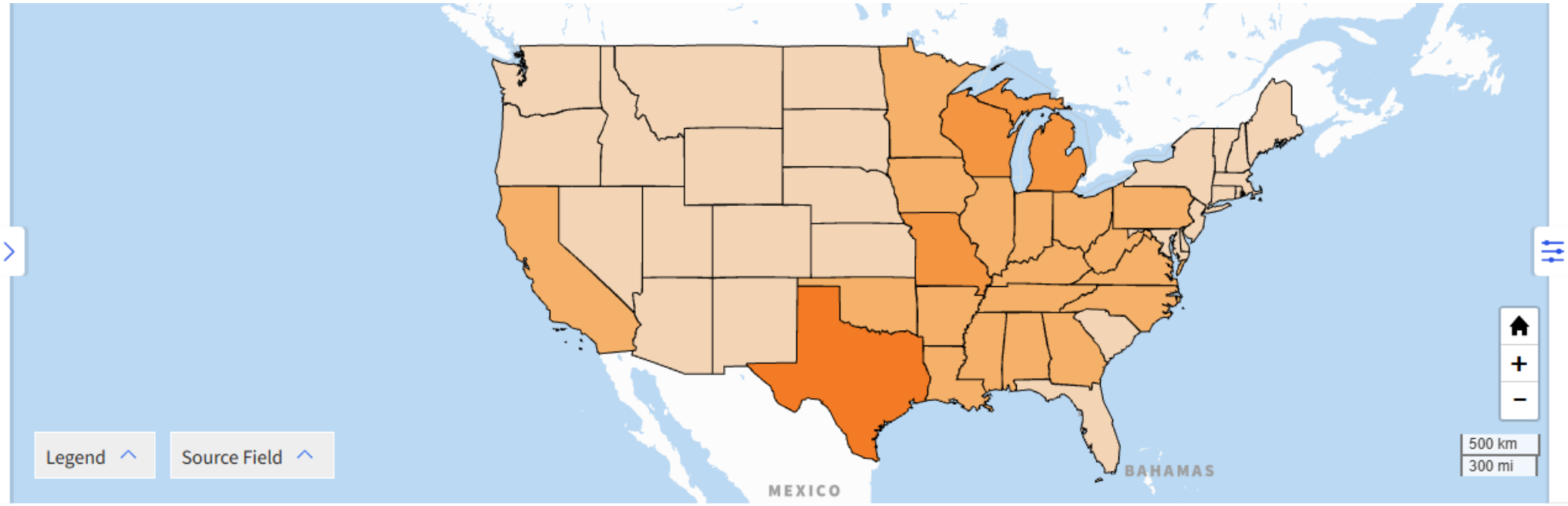
Clear All Filters

Local Data

Data certified as of 09/30/24 | Displaying 1-25 of 7,632,419 records | Download Data

Fund	Holding Company	Deployment Address	Locations Deployed	Download/Upload Speed Tier	Filing Year

Connect America Fund State Broadband Map



State
All States
Fund
All Funds
Holding Company
All Companies
Filing Year
All Years
Speed
All Speeds

State Data | State Data by Speed Tier

Displaying 1-25 of 11,929 records

Data certified as of 09/30/2024 | Data Download

State	Fund	Study Area Code	Holding Company	Filing Year	Total Locations Obligation	Locations Deployed Cumulative	Support Disbursed Cumulative

HUBB Resources

For more information about filing in the HUBB, please visit the HUBB resources webpage.

- Resources include:
  - HUBB filing requirements and deployment milestones (by fund)
  - HUBB FAQs
  - HUBB user guide
  - FCC guidance on location reporting
  - USAC guide to geolocation practices
  - HUBB webinar recording and presentation
  - CAF Map and CAF State Map

Available for Public Use

Verification Reviews: Confirming Broadband Deployment

Verification Reviews: Confirming Broadband Deployment

- All carriers participating in CAF programs with defined broadband build-out obligations are subject to verification reviews to confirm deployment to a random sample of locations reported in the HUBB.
- Verification reviews fall into three main categories:
  - Reviews tied to mandatory annual deployment milestones that begin following the annual March 1 HUBB filing deadline
  - Reviews conducted at the request of carriers that complete deployment ahead of required milestones (meet optional milestones) and are seeking to reduce their Letters of Credit (LOC) values
  - Reviews conducted as part of the FCC Rural Broadband Accountability Plan (RBAP)
- Carriers found to have missed deployment milestones face increased reporting obligations and potential withholding/recovery of support.

Verification Reviews: Confirming Broadband Deployment

- The goal of the verification review process is to confirm that the carrier deployed broadband service meeting the FCC's performance standards to a qualifying number of locations by the relevant deployment milestone deadline.
- USAC selects a statistically valid, random sample of locations records certified in the HUBB by carriers chosen for review and carriers must submit documentation that serves as proof of deployment for each record selected. For all selected locations, the review seeks to confirm that:
  - The upload and download speeds available at the location are at or above the speeds the carrier is required to deliver.
  - The carrier deployed broadband service at the required speeds at the location in time to meet the relevant deployment milestone date.

Verification Reviews: Confirming Broadband Deployment

- For locations reported in the HUBB by carriers using addresses and latitude/longitude coordinates, the review additionally seeks to confirm that:
  - The reported service address accurately corresponds with the reported lat/long coordinates for the location record. USAC needs to confirm this link to tie address-based documentation for a location record back to the certified coordinates for that record.
  - The structure at the location is eligible for CAF support.
    - Examples of eligible structures include housing units, apartment buildings and small businesses that would subscribe to consumer-grade broadband.
    - Examples of ineligible structures include community anchor institutions, buildings that are under construction or abandoned, condemned properties or shelters open to the elements.
  - The actual number of units or dwellings at the location accurately ties back to the reported number of units or dwellings for the location record. (Applies only with reviews of multi-unit location records.)

Verification Reviews: Confirming Broadband Deployment

- For locations reported in the HUBB by carriers using Fabric location IDs, the review additionally seeks to confirm that:
  - The address and/or lat/long coordinates listed in documentation proving deployment at the selected location correspond to the address and/or lat/long coordinates associated with that location in the most recent version of the National Broadband Map.
  - USAC needs to confirm this link to tie this documentation back to the Fabric location ID for that record.

Verification Reviews: Confirming Broadband Deployment

- Carriers must submit documentation that serves as proof of deployment for each location record in the HUBB selected for verification review. Examples of acceptable documentation include:
  - Subscriber bills
  - Screen shots from public-facing service availability tools showing upload/download speeds available at a particular address
  - Letters of certification certified by an outside engineer licensed by the state (including Professional Engineer number) where service was deployed
  - Screen shots from an internal provisioning system showing the broadband speeds available at a particular service address (and associated geo-coordinates if available)
  - Engineering team emails showing that all locations tied to a particular Digital Subscriber Line Access Multiplexer (DSLAM) are released to sales for marketing

Verification Resources

For more information about the verification review process, please visit the verification review resources webpage.

- Resources include:
  - Overview of how the verification review process works
  - Verification review schedule (by fund)
  - Examples of the types of documentation that carriers can supply to prove deployment
  - Verification review webinar recording and presentation

Available for Public Use

Network Performance Testing: Measuring Broadband Speed and Latency

Network Performance Testing

- Ensures that CAF-supported broadband service meets basic performance standards
- Carriers must conduct one week of speed and latency testing in each quarter of the calendar year at a USAC-selected random sample of subscriber locations built with CAF support and reported in the HUBB for each obligated speed tier they must deploy
- Carriers must submit and certify all test results for full sample of selected locations for each Study Area Code (SAC) and obligated speed tier combination – or attest that they cannot find active subscribers to test for a SAC and speed tier combination – within two weeks of the end of each quarter
- At least 80 percent of speed measurements must be at 80 percent of required speeds and 95 percent of low-latency measurements must fall at or below 100 milliseconds round-trip time
  - FCC considers failure to meet speed and latency standards as a failure to deploy and may withhold support until carrier achieves a full quarter of compliance
  - Carriers that fail to conduct the required testing or fail to submit and certify all required test data – or attest that they cannot find active subscribers to test for a particular SAC and speed tier combination – by quarterly deadline may face permanent loss of support

Network Performance Testing

- Before official testing begins, carriers must conduct a year of quarterly “pre-testing”
  - Carriers must conduct one week of speed and latency pre-testing in each quarter of the calendar year at a USAC-selected random sample of subscriber locations built with CAF support and reported in the HUBB for each obligated speed tier they must deploy
  - Carriers must submit and certify all pre-test results for the full sample of selected locations for each SAC and obligated speed tier combination – or attest that they cannot find active subscribers to test for a SAC and speed tier combination – within two weeks of the end of each quarter
  - Carriers do not face withholding of support for failing to meet speed and latency standards during pre-testing if they submit and certify the required test results – or attest to a lack of subscribers – on time each quarter.
- USAC provides quarterly and annual compliance reports to help carriers track their progress in meeting FCC metrics, address shortfalls and submit any missing test data, certifications and/or attestations
  - Compliance reports include details at the SAC level about the percent of upload and download speed tests and latency tests conducted by carrier that met FCC performance standards

Network Performance Testing: Performance Measures Module

Performance Measures Module (PMM) system:

- Lets carriers identify which CAF-supported locations reported in HUBB have active subscribers
  - Carriers can attest to no active subscribers to test for a SAC and speed tier combination
- Generates a random sample of those locations for speed and latency testing and provides obligated speed tiers to be tested (based on speed tiers reported for those locations in the HUBB compared with speeds carriers must deliver)
  - Carriers must obtain a new random sample after two years of pre-testing/testing
- Collects quarterly speed and latency test results and certifications or attestations from carriers
- Calculates compliance with FCC standards based on certified test results
  - PMM allows carriers to download compliance reports that provide SAC-level details about the percent of speed and latency tests that met FCC standards
  - See PMM Compliance Calculations for explanation of how compliance is calculated

Performance Measures Testing Resources

For more information about performance measures testing framework, please visit the performance measures testing resources webpage.

- Resources include:
  - Performance Measures testing schedule (by fund)
  - FCC information about the performance measures testing program
  - Charts showing acceptable test paths and remote server locations
  - Quick tips guide to the PMM
  - An explanation of PMM compliance calculations
  - Performance measures testing webinar recording and presentation (May of 2026)
  - Performance measures testing webinar recording and presentation (January of 2026)

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Additional High Cost Resources

High Cost Resources

For more information about the High Cost program, please visit the High Cost section of the USAC website

- Resources include:
  - High Cost Get Started
  - High Cost Announcements
  - High Cost Funds
    - Lists the individual funds that make up the High Cost program and includes links to fund-specific webpages, which contain details about the service obligations, deployment timelines, network performance requirements and reporting rules that participating carriers must meet
  - High Cost Disbursement Search Tool
    - Displays information about total dollar amounts paid to carriers that receive High Cost support
  - FCC Rural Broadband Accountability Plan (RBAP)
  - High Cost Program Integrity

High Cost Resources

- Most High Cost systems (54.314, Form 481, HUBB, PMM, etc.) are accessible through the E-File/One Portal filing system
  - Please see USAC's Multifactor Authentication Troubleshooting Steps for help logging into E-File
- To reach the High Cost Support Center, call 1-844-357-0408 or send an email to HCQuestions@USAC.org
  - Hours: Monday-Friday 8 a.m. to 8 p.m. ET

Questions?

Thank You!

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