Universal Service Administrative Co.

HUBB Frequently Asked Questions

Q. Which carriers are required to report geo-located broadband deployment data to the HUBB (High Cost Universal Broadband) portal? Carriers participating in which funds?

A. Carriers that participate in funds that have defined broadband deployment obligations (i.e. carriers required to build out broadband service to a specific number of locations) must report geo-located deployment data to the HUBB portal.

Q. Which carriers are <u>not</u> required to file in the HUBB?

A. Carriers that participate in funds that do not have defined broadband deployment obligations do not file data in the HUBB portal. This includes carriers participating only in legacy High Cost funds and Alaska Plan carriers with individualized performance plans requiring them only to maintain service at existing levels.

Q. What data does the HUBB collect from carriers?

A. The HUBB collects the following data for every location deployed with CAF support: Study Area Code (SAC), latitude and longitude coordinates, date of deployment, speed tier, address, number of units and carrier ID (optional). The HUBB also collects broadband technology for CAF II Auction and RDOF carriers, and broadband technology and latency for CAF II Auction, Alaska Plan and Rural Digital Opportunity Fund (RDOF) carriers.

Q. What does the HUBB do with the data that is uploaded to the system?

A. The HUBB performs real-time validation of geo-located broadband deployment data by conducting a series of automated checks of the information. Among other things, the system validates that a location's latitude and longitude coordinates fall within a census block or area eligible for funding and that the location is not a duplicate of one that has already been filed. The HUBB also checks to be sure that the date of deployment falls within the timeline of the fund in which the carrier participates and calculates carrier progress toward meeting the fund's broadband build-out obligations, including interim deployment milestones. The HUBB will not accept locations that do not pass these automated validation checks and carriers will not receive credit for those deployments.

Q. The HUBB will only accept – and a carrier will only receive credit for – locations deployed in areas or census blocks eligible for support under the rules of the fund in which it participates. Do those eligible areas – and the shapefiles associated with them, which the HUBB uses for validation checks – change to reflect updated census block data?

A. No. Eligible areas and eligible census blocks – and associated shapefiles – are set at the start of a program and remain fixed throughout the duration of the fund. This means that existing funds with eligible areas established with 2010 census block data still rely on 2010 census data.

In addition, changes in census geographies do not change carrier deployment obligations. The FCC will only adjust eligible areas and deployment obligations using specific adjustment processes such as the Eligible Location Adjustment Process (ELAP) for CAF II Auction carriers and Broadband Data Collection adjustments for the Rural Digital Opportunity Fund (RDOF).

Q. Do carriers have to report all locations where broadband is "available" or only locations with actual subscribers?

A. Carriers must report, and will receive credit for, served locations. A location is considered served if the carrier could turn up service meeting at least the minimum speed, latency and usage requirements within 10 business days of receiving an end-user request.

Q. Should carriers report speed tiers by the speeds that are available at a location or by the speeds the customer at a location actually subscribes to?

A. Carriers should report speed tiers based on speeds offered at a particular location, i.e., the maximum speed offered. Please note that the HUBB recently updated speed tier IDs to incorporate a new speed tier, for 50 megabits per second upstream and 5 megabits per second downstream (50/5Mbps). To account for this new speed tier – now speed tier ID 6 - the HUBB has automatically shifted by 1 the existing speed tier IDs for all locations already certified in the HUBB at faster speeds. For instance, a location with speeds of 100 megabits per second upstream and 20 megabits per second downstream (100/20 Mbps) is now speed tier 7, instead of speed tier 6. Please review the HUBB Data Formatting Instructions to find the updated speed tiers.

Q: Will carriers receive credit for their build-out obligations at slower speeds if they offer faster speeds and therefore select faster speed tiers when reporting locations in the HUBB? For example, if an ACAM carrier selects the 100/25 Mbps speed tier when filing a location in the HUBB, will that location count toward its 25/3 Mbps deployment obligation?

A: Yes. Locations reported at faster speeds can count toward 25/3 Mbps, 10/1 Mbps or 4/1 Mbps build-out obligations. For instance, if a carrier is required to offer speeds of 25/3 Mbps at 100 locations, 10/1 Mbps at 100 locations and 4/1 Mbps at 25 locations, and it offers speeds of 100 megabits at 225 locations, it has met its build-out requirement.

Q. Does a carrier still have to file with the HUBB even if it did not deploy any new locations in the prior year?

A. Yes. Carriers that have no new deployments to report must still log into the HUBB and certify "no locations to upload" before the annual March filing deadline. Carriers that have quarterly reporting obligations because they are in the compliance gap but have not deployed any new locations during the quarter must still log into the HUBB and certify "compliance gap no locations" ahead of the quarterly reporting deadline.

Q. Does a carrier still have to file with the HUBB even if it meets its 100 percent deployment milestone ahead of schedule?

A. Yes. A carrier must file broadband deployment data in the HUBB through the end of the one-year "cure period" following the final 100 percent milestone deadline of the fund in which it participates – even if the carrier completes deployment ahead of schedule, passes USAC verification review and is released from its Letter of Credit (LOC) obligations. (The "cure period" gives a carrier up to 12 months following the 100 deployment milestone deadline to make up any deployment shortfalls and address any compliance gaps). If a carrier has not deployed any locations over the previous calendar year, it must still log into the HUBB and certify "no locations to upload."

Q. Is it possible to edit, delete or replace records filed in the HUBB?

A. Carriers can delete, edit or update individual records that have been uploaded to the HUBB – but not yet certified – using the edit tool (the pencil) when reviewing the data. After the data has been certified, the HUBB portal allows deletions, as well as revisions to speed tiers (to reflect network upgrades), month and day of deployment, address field, carrier ID and latitude and longitude coordinates, if the change would move a location by a distance of 36 feet or less. Carriers can delete or edit individual records or do this on a bulk basis during the current filing year. (Please note that if a city or county agency changes a local address or addresses, carriers must update those records in the HUBB.)

After a filing year closes, carriers can only use the bulk deletion or modification functionality, using the latest USAC templates, to delete or edit certified deployment records in the HUBB. Carriers must provide a reason for all deletions. Any change to deployment year in a certified HUBB record is subject to FCC approval. If, however, a carrier needs to change latitude and longitude coordinates in order to move a location by more than 36 feet or edit the number of units at a location from a closed filing year, the carrier must delete the existing location out of the HUBB and upload a replacement location for the new filing year. In other words, the carrier can resubmit the location using the current year. But it must retain records to demonstrate the link between the new location record being uploaded and the location record (including HUBB ID) it is replacing.

In addition, carriers that have certified "no locations to upload" may undo that certification and file new locations with the system while the filing window is open.

Note that carriers are unable to edit, modify or delete HUBB records for locations that have been randomly selected for verification review while the review is ongoing. Carriers are also unable to edit the number of units for HUBB records for subscriber locations that have been randomly selected for speed and latency testing during the two years when those locations are part of the testing sample.

Q. Should carriers report network upgrades to existing locations that were already certified in the HUBB during an earlier filing window? For instance, if a carrier deployed broadband with speeds of 10/1 Mbps in 2018 and reported those locations to the HUBB by March 1, 2019, should the carrier report an upgrade to 25/3 Mbps to those locations that took place in 2021 with the HUBB by March 1, 2022? And if so, should the carrier leave the original date of deployment unchanged?

A. Yes. Carriers should report network upgrades to locations that were already filed and certified in the HUBB in prior years. To report a network upgrade, a carrier would use the edit function in the HUBB to upgrade the speed tier for the affected locations, but leave the original date of deployment as is. The carrier must also indicate in the message box what part of the filing it is changing and the reason for the change.

Q. Are carriers required to report all locations deployed using CAF support in the prior year with the HUBB? What should a carrier do if it discovers locations that should have been reported by the filing deadline after that date?

A. Yes. Carriers must file all locations deployed in the prior year with the HUBB by the following March. If a carrier discovers missing locations after the annual filing deadline, it should file those in the HUBB as soon as possible.

New FCC rules (FCC 23-87, para. 152-161) allow carriers to submit and certify "late-reported locations" and to count those locations toward their deployment obligations, but these carriers may be subject to support reduction based on the number of locations reported late as a percent of total locations reported and the number of days after the filing deadline that they are submitted. The FCC grants carriers a one-time grace period to submit and certify late-reported locations in the HUBB filing without penalty. The FCC also does not reduce support for late-reported locations if a carrier has demonstrated compliance with its final deployment milestone.

Q. What should a carrier do if a location that was reported during a prior year was later destroyed or is no longer habitable, but is still in the HUBB?

A. Carriers should delete destroyed locations or locations that are no longer habitable out of the HUBB.

Q. How is date of deployment defined? Is it the date the customer turns on service or the date a cabinet is placed in the field?

A. The date of deployment is the date when the carrier could turn on service meeting minimum speed, latency and usage requirements within 10 business days of an end- user request.

Q. What should a carrier file for date of deployment if the exact date is unavailable?

A. Carriers should make a good-faith effort to file a full and correct date. If the carrier does not know the day or month of deployment, it should still make a good faith effort to input the correct year of deployment to ensure that it is meeting its deployment milestones and annual reporting requirements.

Q. What should a carrier put in the address field if a postal address for a deployed location is unavailable?

A. If an actual postal address is unavailable, carriers must supply an identifying description of the location, such as a road mile marker or an intersection.

Q. If a carrier provides service to an apartment building with 10 units (all at the same latitude/longitude), but only five units subscribe, can the carrier still report that as 10 locations deployed?

A. Yes. The carrier should report 10 in the data field for number of units where service is available. In this example, the carrier can count 10 locations towards its deployment milestone obligation.

Q. How should a carrier report deployment at a residence that also has a home-based business within the same structure?

A. A carrier should report and receives credit for the house regardless of whether the residence subscribes to the service. The carrier can count a business run out of a house as a separate unit if there are separate facilities (drop/line), separate equipment (e.g., modem) and a separate subscription (with a separate bill) showing that the carrier is providing at least the minimum required speeds. See DA-16- 1363 WCB Guidance on Location Reporting for Carriers Receiving CAF Support.

Q. How should a carrier report deployment to multiple structures on a single property, lot or land parcel?

A. A carrier should report and receives credit for the house regardless of whether the residence subscribes to the service. The carrier can count a separate connection to a barn, shed or other structure on a property if there are separate facilities (drop/line), separate equipment (e.g., modem) and a separate subscription (with a separate bill) showing that the carrier is providing at least the minimum required speeds at that structure. The carrier should report each structure

served as a separate location – with separate latitude and longitude coordinates – in the HUBB. See DA-16-1363 WCB Guidance on Location Reporting for Carriers Receiving CAF Support for information about which structures are eligible for CAF support and can count toward deployment obligations.

Q. Can a carrier assign an individual ID to each record filed with the HUBB? Does the system do that automatically?

A. The HUBB CSV template contains an optional field for carrier IDs (IDs generated by carriers' own systems). Carriers may leave this field blank, but USAC encourages carriers to assign an ID to track changes later. The HUBB also automatically generates a HUBB ID on the back end for each individual location filed with the system. The HUBB ID can be found by clicking "view" on the location record.

Q. Can a partial data upload be certified?

A. Yes. Carriers do not have to certify all data at once.

Q. Does each location need to be certified individually? Or is there a way to certify many or all locations at once? The "select all" certify button selects only the locations shown on an individual screen. Is there a way to certify all screens at once?

A. It is possible to do bulk certifications. Click the box next to "SAC" in the header. This will bring up a message that asks if the carrier wants to select all records for certification at once.

Q. Will the HUBB indicate when certification is complete?

A. The system displays a confirmation screen for certified data and sends a confirmation email once the certification process is complete. The HUBB also allows carriers to filter records by certified or uncertified data.

Q. Many rural properties are very large. Where on a property should a carrier gather latitude and longitude coordinates?

A. Whenever possible, location coordinates should represent the structure being served and should be collected at some point inside the structure's footprint. These are called "rooftop" coordinates. Ideally, carriers should gather coordinates at a spot unambiguously associated with the structure, such as the network connection point or the front door. At a minimum, coordinates should represent a point on the correct property or parcel of land where service is being delivered. Carriers should try to collect coordinates as close as possible to the structure being served, and should not submit coordinates at the network node or pedestal used to serve a location. For guidance on how to collect accurate geolocation coordinates, please see: Geolocation Methods: A guide to successfully collecting broadband deployment data.

Q. Why do carriers have to report latitude/longitude coordinates to six decimal points?

A: Asking carriers to report latitude/longitude coordinates to six decimal places helps ensure that the HUBB portal will not reject separate locations as duplicates. That's because latitude/longitude coordinates reported to six decimal places represent a spatial resolution of approximately four inches in the real world. There is little risk of actual deployment to two separate locations that are less than four inches apart.

Q. Since the HUBB checks to make sure that a location is in an area eligible for funding, does it allow for any margin of error if the latitude and longitude coordinates are on the edge of an eligible area?

A: Yes. The HUBB provides a 7.6-meter buffer. This buffer reflects the spatial accuracy of the census block boundaries and U.S. Census Bureau TIGER database, which has a published map accuracy for well-defined points (such as street intersections) of 7.6 meters at the 90 percent confidence level. This means that if 10 random test points from the TIGER database are compared with "ground truth" – that is, if 10 random points from the database are compared with independently collected GPS coordinates – difference would be less than 7.6 meters in any direction for at least nine of the test points. The buffer also allows USAC to determine if latitude/longitude coordinates filed with the system fall within 7.6 meters of the eligible area boundaries, and will accept them even if they are outside of the eligible area but within 7.6 meters of the boundary.

Q. Can USAC recommend a particular GPS application? Or a particular mapping or geocoding application?

A: There are many GPS smartphone applications on the market. Some are free and some cost a modest amount. USAC does not recommend any particular GPS smartphone applications, but suggests that carriers evaluate several options to find one that meets their needs. Features to look for include the ability to: collect GPS data offline (when out of range of cell coverage), store and transmit GPS coordinates, and add a brief description or ID to GPS coordinates.

USAC also does not recommend particular mapping or geocoding applications, other than the state geocoders that a number of states have created using address points as reference data. For a list of currently-known state geocoders, please see: Geolocation Methods: A guide to successfully collecting broadband deployment data.