

A man with a beard is shown in profile, looking at a tablet device. He is standing in a field of solar panels. The entire image has a blue color cast. The background shows rows of solar panels stretching into the distance under a cloudy sky.

Connect America Fund: Filing in the HUBB

Jan. 9, 2025



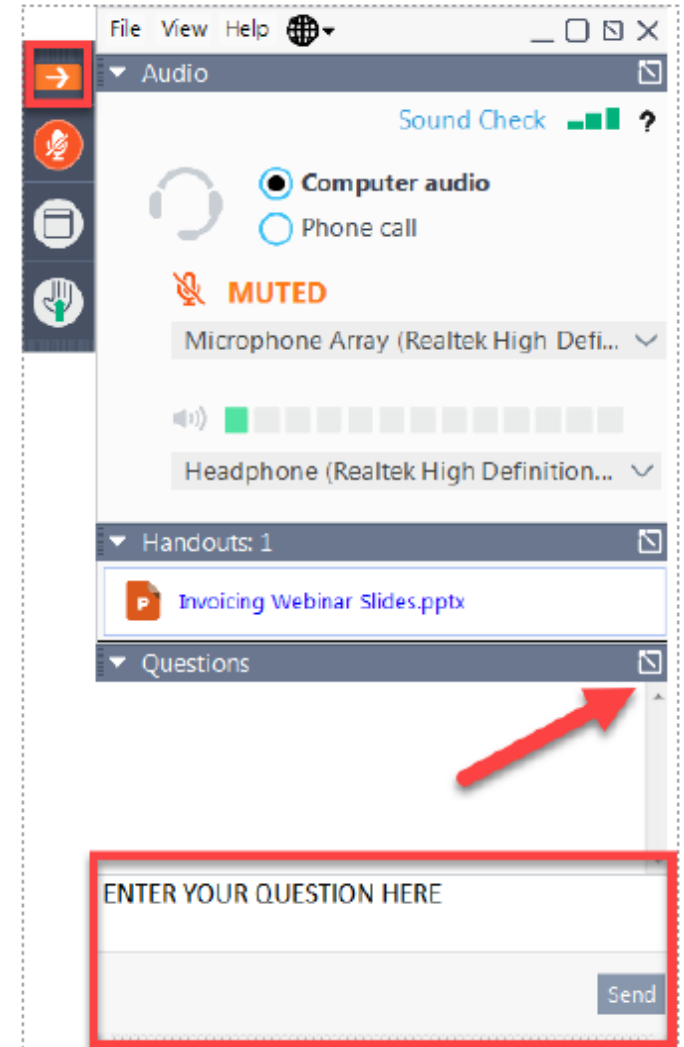
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- A copy of the slide deck is in the "Handouts" section of webinar panel.



Today's Speakers

- **John Putman**

Senior Program Analyst | High Cost

- **Tim Weith**

Director of Program Management | IT

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Connect America Fund: Filing in the HUBB

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High Cost and the Connect America Fund (CAF)

The **High Cost** program ensures universal availability of essential and affordable telecommunications services in rural America. A centerpiece of the program is the **Connect America Fund**.

- Subsidizes broadband to help close the digital divide in rural America
- Consists of roughly a dozen modernized funds that give carriers fixed monthly payments to deploy and maintain robust communications networks - which provide voice service and broadband at required speeds - in eligible areas over defined timelines
- Requires carriers with fixed broadband deployment obligations to connect a specific number of locations by interim and final milestone deadlines
- Provides support to traditional rural phone companies, rural electric cooperatives, cable operators, wireless operators, wireless Internet service providers, satellite providers
- Subjects carriers to extensive compliance framework to ensure required deployment

Connect America Fund Compliance

USAC 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.

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 milestone cure periods.)

This compliance framework safeguards Connect America Fund accountability, transparency and integrity.

HUBB Portal: Tracking Broadband Deployment

- Carriers in modernized funds with defined fixed broadband build-out obligations must file deployment data annually with the HUBB
- Annual HUBB filing deadline is March 1 for carriers to report broadband deployed with CAF support in the prior calendar year or certify “no locations” to upload for the year
 - **Filing deadline in 2025 is March 3 since March 1 falls on a weekend**
- HUBB collects: geographic coordinates (latitude/longitude) of locations where carriers have deployed broadband with CAF support, speeds available, deployment dates and unit counts
 - Enhanced ACAM data collection works differently – Carriers report deployment by Fabric ID
- HUBB performs automated, real-time data validation checks and only accepts locations that pass:
 - Checks that lat/long of a reported location fall within area eligible for funding
 - 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.
- **Accurate geolocation data is key to filing successfully in the HUBB**
 - See USAC guide on geolocation best practices

Verification Reviews: Confirming Broadband Deployment

All carriers participating in CAF programs with defined broadband build-out obligations are subject to verification reviews to confirm reported deployment. Reviews fall into three categories:

- Reviews tied to mandatory annual deployment milestones (interim and final) that begin following the annual March 1 HUBB filing deadline
- Reviews conducted at the request of carriers that complete deployment ahead of required milestones (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)
 - Can occur before a required milestone even if a carrier does not request a review

(Carriers may also be subject to site visit audits.)

Carriers found to have missed deployment milestones face increased reporting obligations and potential withholding/recovery of support

Verification Reviews: Confirming Broadband Deployment (Cont.)

The goal of the verification review process is to confirm that a 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 certified in the HUBB by carriers chosen for review and seeks to verify that:

- The structure at the reported location is eligible for CAF support
- The reported service address accurately corresponds with the reported lat/long coordinates
- The upload and download speeds available are at or above the speeds the carrier must deliver
- The carrier deployed service at the required speeds in time to meet the deployment milestone
- 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

Verification Reviews: Confirming Broadband Deployment (Cont.)

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 tool 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 DSLAM are released to sales for marketing

Network Performance Testing: Measuring Speed and Latency

- Framework ensures that CAF-supported broadband service meets basic performance measures standards
- Carriers must conduct one week of speed and latency testing at random sample of CAF-supported HUBB locations with active subscribers in each quarter of the year (unless subject to FCC waiver)
- Starting in 2025, carriers must submit and certify all test results for the full sample of locations within two weeks of the end of each quarter
 - This quarterly reporting requirement is new
- 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

Network Performance Testing: Measuring Speed and Latency (Cont.)

- Before official testing begins, carriers must conduct a year of quarterly “pre-testing”
 - Carriers must conduct one week of speed and latency pre-testing at a random sample of CAF-supported HUBB locations with active subscribers in each quarter of the year (unless subject to FCC waiver)
 - Carriers must submit and certify all results from pre-testing conducted at the full sample of locations within two weeks of the end of the quarter, but will not face withholding of support for failing to meet speed and latency standards as long as they submit required data
- USAC provides quarterly compliance reports to help carriers track their progress in meeting FCC metrics so that they can address shortfalls and submit missing data
 - Compliance reports include details at the SAC level about the percent of upload and download speed tests and latency tests conducted in the quarter that met FCC performance standards

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HUBB Portal: Tracking Broadband Deployment



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HUBB Portal: Filing Obligations by Fund

Carriers in these funds (and ACS) have until March 3, 2025, to file data for locations deployed in 2024 or certify “no locations to upload”:

- **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)**
 - HUBB will only accept CAF BLS locations deployed since May 25, 2016
- **Rural Broadband Experiments (RBE)**
- **Rural Digital Opportunity Fund (RDOF)**
 - RDOF carriers must submit any locations deployed since July 1, 2019
- **Alaska Plan**
 - Alaska Plan carriers must also submit node and link data for middle-mile fiber and microwave networks
- **Bringing Puerto Rico Together (Uniendo a Puerto Rico) and Connect USVI Fund (PR/USVI) Stage 2 Fixed Support**
- **Enhanced ACAM**

HUBB Portal: Fabric Integration for Enhanced ACAM Carriers

- Enhanced ACAM is first CAF program to report deployment data in the HUBB using 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
 - Along with the FCC [Broadband Data Collection](#) (BDC), Fabric dataset serves as a foundation for the [National Broadband Map](#)
- Enhanced ACAM relies on the Fabric to determine broadband deployment obligations and each Enhanced ACAM carrier has a list of required locations
 - List of required locations contains the Location IDs from the Fabric that identify the locations where the carrier must offer service
- Enhanced ACAM carriers must report deployment data in the HUBB using Fabric Location IDs and HUBB validates that the reported Fabric Location IDs are included in the carrier's list of required locations

HUBB Portal: Certifying Broadband Deployment

- **Carriers have until March 3, 2025, to file and certify data for locations deployed in 2024**
 - Carriers can file and certify locations throughout the year
- **Carriers with 2024 deployment milestones must also complete a separate milestone certification as part of the annual HUBB filing**
 - **This includes separate milestone certifications for separate deployment obligations by speed tier**
 - Carriers may be subject to verification reviews of their 2024 milestones in 2025 to confirm deployment to a random sample of reported locations
 - Carriers found to have missed deployment milestones face increased reporting obligations and potential withholding/recovery of support
 - Carriers that miss a deployment milestone must inform the FCC, USAC and relevant state and Tribal governments within 10 days of the milestone deadline (by early January for year-end milestone deadline)

HUBB Portal: Deployment Milestones by Fund

Carriers in the following funds had mandatory deployment milestones at end of 2024 and may face verification reviews in 2025:

- **Original ACAM** carriers faced an 80 percent milestone for deploying 10/1 Mbps broadband by end of 2024
- **Revised ACAM** carriers faced an 80 percent milestone for deploying 10/1 Mbps broadband and a 60 percent milestone for deploying 25/3 Mbps broadband, both by end of 2024
- **ACAM II** carriers faced a 60 percent milestone for deploying 25/3 Mbps broadband by end of 2024, and were required to meet similar deployment obligations on Tribal lands
- **CAF II Auction** carriers faced an 80 percent milestone for required deployments by end of 2024
- **RDOF** carriers authorized in 2021 faced a 40 percent milestone for required deployments by end of 2024
- **PR/USVI** carriers faced a 40 percent milestone for required Stage 2 fixed deployment by the end of 2024

HUBB Portal: Deployment Milestones by Fund (Cont.)

- **CAF BLS** carriers faced a five-year milestone for deploying 25/3 Mbps broadband to 100 percent of required location counts by the end of 2023. Carriers that were out of compliance with that five-year milestone had a **one-year “cure period”** (ended Dec. 31, 2024) to make up any deployment shortfalls and address any compliance gaps.
- **RDOF** carriers authorized in 2022 carriers can take advantage of an optional 10 percent milestone by the end of the second year of support (which is 2024 for carriers authorized in 2022) to reduce LOC values.
 - The FCC recently lowered the optional deployment milestone threshold to 10 percent from 20 percent
- **RBE** carriers face rolling deployment milestones

HUBB Portal: Certifying Broadband Deployment

- All carriers must also complete a **separate annual certification** in the HUBB between Jan. 1, 2025, and March 3, 2025, to confirm that their filing activity for 2024 is complete
 - This certification confirms that a carrier has reported and certified all its deployments for the filing year
 - Carriers that did not deploy any locations in 2024 must still log into the HUBB and certify “no locations to upload” between Jan. 1, 2025, and March 3, 2025
 - This replaces the former “no locations” certification
 - “No locations to upload” certification functionality is only turned on in the HUBB between Jan. 1, 2025, and March 3, 2025
 - Carriers can no longer certify “no locations” for the year outside of this window

HUBB Annual Certification – Reminder

Select Application: 1 HUBB

Home Manage Uploads Location Details Milestone Certification and Reporting **Annual Certification**

Annual Certification

① The Annual Certification window is open for ACAM. There are 60 days left to certify

① The Annual Certification window is open for AK PLAN. There are 81 days left to certify

① The Annual Certification window is open for ACAMB. There are 31 days left to certify

Carriers are required to certify each SAC for the current filing year. You can find more information on the certification process and the data in the table below in the 'Help with Certifying' section on the right.

[Detailed Instructions](#)
[Annual Certification FAQ](#)

Annual Certification Data table

999999

Status: Not Certified Fund: All Funds SAC: 999999 Year: 2023 [Clear All](#) [Filter](#)

① Select a record below to view the available action

<input type="checkbox"/>	SAC	Year	Fund	Obligation Type	Yearly Target Obligations	Uploaded Locations	Certified Locations	Cumulative Certified	Milestone on Target
<input type="checkbox"/>				25 Mbps/3 Mbps	2935				No
<input type="checkbox"/>	999999	2023	ACAM	Final 10 Mbps/1 Mbps		11	0		-
<input type="checkbox"/>				Final 4 Mbps/1 Mbps					-
<input type="checkbox"/>				Original 10 Mbps/1 Mbps	5991	11	0		Yes



Annual Certification Tab

HUBB Annual Certification – Reminder

Annual Certification

The Annual Certification window is open for ACAM. There are 60 days left to certify

The Annual Certification window is open for AK PLAN. There are 81 days left to certify

The Annual Certification window is open for ACAMII. There are 31 days left to certify

Carriers are required to certify each SAC for the current filing year. You can find more information on the certification process and the data in the table below in the 'Help with Certifying' section on the right.

[Detailed Instructions](#)
[Annual Certification FAQ](#)

Annual Certification Data table

Status: Not Certified | Fund: All Funds | SAC: 999999 | Year: 2023 | Clear All | **Filter**

Select a record below to view the available action

1 selected | **Select All** | **Certify** | Deselect All

<input checked="" type="checkbox"/>	SAC	Year	Fund	Obligation Type	Yearly Target Obligations	Uploaded Locations	Certified Locations	Cumulative Certified	Milestone on Target
<input checked="" type="checkbox"/>	999999	2023	ACAM	25 Mbps / 3 Mbps	2500	2450	2450	9575	Yes
				4 Mbps / 1 MBPS	500	450	450	675	Yes

Check Box and Click Certify to complete Annual Certification for this SAC



HUBB Annual Certification – Reminder

Certify SACs

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data reported in the HUBB; and, to the best of my knowledge, the reporting carrier submitted and certified the total deployments the reporting carrier completed in 2022. If none have been submitted and certified, I certify that there were no new deployments

You have selected the following SAC(s) to certify:

- 999999

Digital Signature

SPO PMM

[Cancel](#) [Certify](#)


Certifying Officer
Completes Annual
Certification

A man with a beard, wearing a dark t-shirt, stands in profile on the left side of the frame, looking at a tablet device he is holding with both hands. The background shows a field of solar panels under a cloudy sky. The entire image has a blue color cast.

HUBB Portal: Fabric Integration for Enhanced ACAM Carriers



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Fabric vs. Broadband Data Collection

WHAT'S ON THE NATIONAL BROADBAND MAP?

The National Broadband Map consists of 2 datasets, both of which can be challenged:

FABRIC LOCATIONS

- **What is it?**
 - The Fabric is a dataset of all locations in the United States and Territories where fixed broadband internet access service is or could be installed.
- **Who creates it?**
 - The Fabric is developed by CostQuest in consultation with the FCC and in accordance with FCC rules.
- **Challenges and updates timeline?**
 - The Fabric is updated twice per year.
 - Fabric challenges are accepted on an ongoing basis and successful challenges will be reflected in future Fabric releases.
- **What's on the current map?**
 - The December 2023 version of the Fabric is the base of the current map.

BROADBAND AVAILABILITY

- **What is it?**
 - Broadband availability data shows what broadband services, if any, are available at locations included in the Fabric, as reported by internet service providers every 6 months.
- **Who creates it?**
 - Internet service providers report their availability data to the FCC every 6 months.
- **Challenges and updates timeline?**
 - Broadband availability data is updated every 2 weeks to reflect challenge outcomes.
 - Challenges are accepted and resolved on an ongoing basis.
- **What's on the current map?**
 - The map shows availability data as-of December 31, 2023, and reflects resolved availability challenges.



BroadbandMap.gov

Rev. 5/21/2024

HUBB Fabric Integration for Enhanced ACAM Carriers

- Each Enhanced ACAM carrier has access to interim and final lists of “required locations” – which are authorized lists of the Location IDs from the Fabric that identify the locations where the carrier must offer service – and must report deployment in HUBB using Fabric Location IDs
- HUBB validates that reported Fabric Location IDs are on the carrier’s list of required locations
 - Functionality now live in the HUBB
- Enhanced ACAM carriers do not report lat/long coordinates, addresses or number of units served
- Carriers can only report Fabric Location IDs that are on their authorized lists, and must account for every required Fabric Location ID on their authorized lists by end of the program cure period
- Carriers should only report Fabric IDs associated with the locations where they have deployed service

HUBB Fabric Integration for Enhanced ACAM Carriers (Cont.)

- The HUBB validates that reported Fabric Location IDs are on the carrier's list of required locations
- For the HUBB filing due March 3, 2025, the HUBB validates reported Fabric Location IDs against each carrier's list of interim required locations from December 2024
 - Lists posted here: <https://www.fcc.gov/wireline-competition/interim-required-locations>
 - The interim locations file from December 2024 includes only the locations identified as "required" in the July 2024 interim locations file and is subject to future updates
- FCC will finalize the required locations lists for Enhanced ACAM carriers no later than December 31, 2025, and the HUBB will validate the HUBB filing due March 2, 2026, and all subsequent HUBB filings against each carrier's final list of required locations from its final eligible locations file

HUBB Fabric Upload Template

- HUBB utilizes a new CSV template for carriers to upload Fabric locations
- GPS coordinates and address no longer required – only Fabric Location IDs

	A	B	C	D	E	F	G	H	I
1	Study Area Code*	Fabric Location ID*	Date of Deployment*	Download/Upload Speed Tier*	Carrier Location ID	Technology	Other Technology	Latency	Reason Code*
2									

- Fabric Location ID is a 10-digit number from the carrier’s authorized location list
- Required speed tier minimum is 100/20 (Speed Tier ID – 7)
- Technology, Other Technology (if required) and Latency are Required fields
- Reason Code is 1 for Location is Served
- Bulk Modification and Bulk Deletion functionality is also available
- New Templates and Data Formatting Guides available in HUBB and USAC.org

HUBB Fabric Uploads

[Home](#)

[Manage Uploads](#)

[Location Details](#)

[Milestone Certification and Reporting](#)

[Annual Certification](#)

Annual Certification will be reverted if any changes are made to a SAC, such as certifications, modifications, uploads, or deletions.

Manage Uploads

Use the templates below to upload, modify, and delete data. For more information, refer to the Help With Uploading Section.

Non-Fabric Templates

- Use the [Non-Fabric CSV Template](#) to upload Non-Fabric data
- Use the [Non-Fabric Bulk Modification Template](#) to modify previously uploaded data
- Use the [Non-Fabric Bulk Deletion Template](#) to delete previously uploaded data

Fabric (E-ACAM) Templates

- Use the [Fabric CSV Template](#) to upload Fabric data
- Use the [Fabric Bulk Modification Template](#) to modify previously uploaded data
- Use the [Fabric Bulk Deletion Template](#) to delete previously uploaded data

Help with Uploading

[Non-Fabric Detailed Instructions](#)

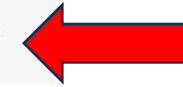
[Fabric \(E-ACAM\) Detailed Instructions](#)

[Filing Guidance Q&A](#)

New Upload Templates for Fabric Uploads, Bulk Modification and Bulk Deletion



Instructions for both Fabric and Non Fabric Uploads



Upload Files

What type of data do you want to upload?

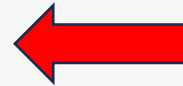
Non-Fabric Fabric (E-ACAM)

File Type

Select File Type

Upload

Select the file type for upload Fabric or Non Fabric



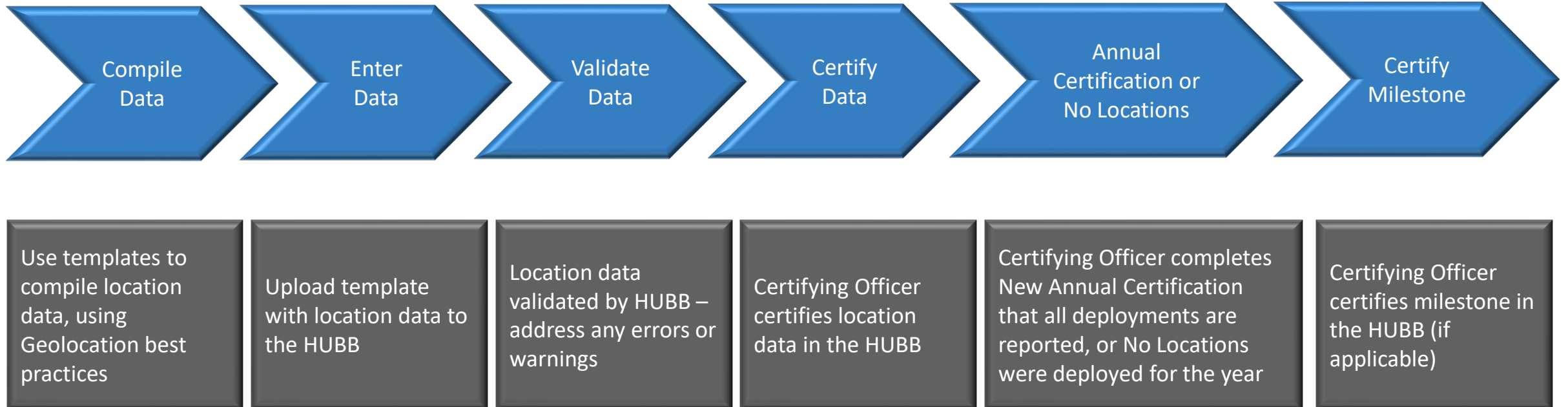
Recently Uploaded Files

There are currently no uploaded files.

HUBB Non-Fabric vs. Fabric

	Non Fabric	Fabric
Obligations	Carriers must deploy a predetermined number of locations within their authorized area over the life of the fund	Carriers must account for all required authorized locations (Fabric Location IDs) within their authorized area over the life of the fund
Location Reporting	Carriers provide latitude and longitude along with address for each deployed location	Carriers only need to provide the Fabric Location ID for each location
Location Validation	Location must fall within the carrier's authorized area based on its GPS coordinates and not be a duplicate	Location Fabric Location ID must be on the carrier's authorized list and not be a duplicate
Certification	Carriers certify that locations have been deployed according to fund requirements	Carriers certify that locations have been deployed according to fund requirements
CAF Map	Certified locations displayed on CAF Map	Certified locations NOT displayed on CAF Map Carriers also report deployed locations to BDC for display on the FCC Broadband Data Map

HUBB Data Filing Process



HUBB Portal: System Entitlements

The HUBB is accessible through USAC's E-File system. Please see USAC's [Multifactor Authentication Troubleshooting Steps](#) for help logging into E-File. Users must have one of the following HUBB entitlements to access the system:

- **HUBB SPO (Service Provider Officer):** allows the user to enter and certify data.
- **HUBB SPU (Service Provider User):** allows the user to enter but not certify data (typically provided to users inside the carrier).
- **HUBB SPA (Service Provider Agent):** allows the user to enter but not certify data (typically provided to agents outside the carrier).

The individual listed as the company officer on the carrier's Form 498 can assign these entitlements. See [USAC's 498 ID webpage](#) for help registering for a Form 498 ID, also called a Service Provider ID (SPIN).

HUBB Portal: Tracking Broadband Deployment

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

<https://www.usac.org/high-cost/annual-requirements/submit-data-in-the-hubb/>

Resources include:

HUBB [FAQs](#)

USAC [Guide](#) to Geolocation Practices

FCC [Guidance](#) on Location Reporting

[HUBB User Guide](#) and [Data Formatting Instructions](#)

Templates for Non-Fabric [data uploads](#), [bulk deletions](#) and [bulk modifications](#)

[Fabric Data Formatting Instructions](#)

Templates for [Fabric Location Uploads](#), [Fabric Bulk Deletions](#) and [Fabric Bulk Modifications](#)

Verification Reviews: Confirming Broadband Deployment

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

<https://www.usac.org/high-cost/resources/fund-verification-reviews/>

Resources include:

Verification webinar [recording](#)

Verification webinar [presentation](#)

Verification review schedule (by fund)

Examples of the types of documentation that carriers can supply to prove deployment

Network Performance Testing: Measuring Speed and Latency

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

<https://www.usac.org/high-cost/annual-requirements/performance-measures-testing/>

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

List of [vendors](#) that are helping carriers with speed and latency testing

Quick tips [guide](#) to the PMM

Performance measures testing webinar [recording](#)

Performance measures testing webinar [presentation](#)

An [explanation](#) of PMM compliance calculations

Questions?