

A man with a beard is shown in profile, looking at a tablet device. He is standing in a field of solar panels under a cloudy sky. The entire image has a blue color overlay.

Eligible Locations Adjustment Process: An ELAP Overview For CAF II Auction Winners



Universal Service
Administrative Co.

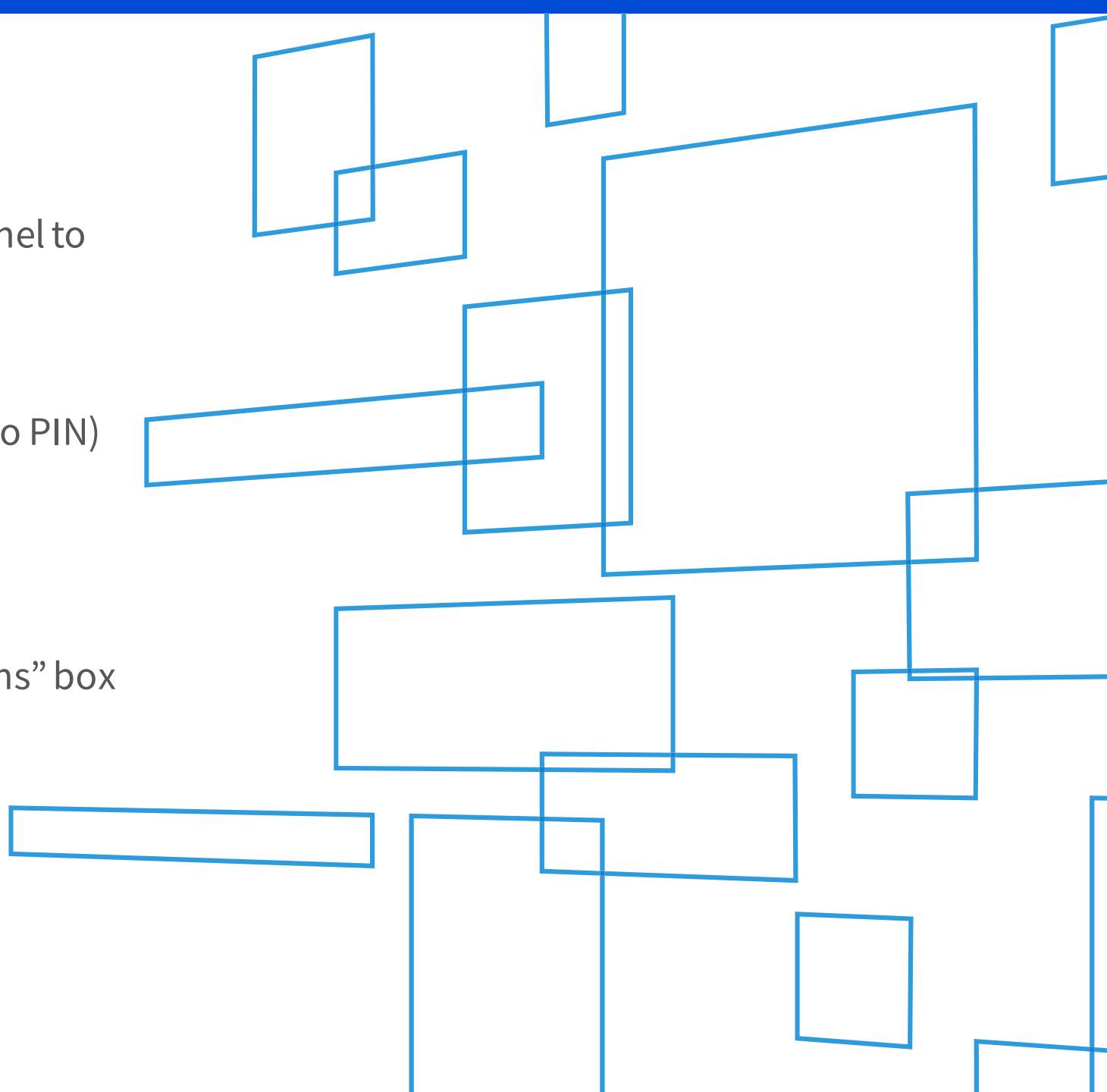
October 20, 2020

Housekeeping

- Use the “Audio” section of your control panel to select an audio source
- Turn on your computer’s speaker, or
- Use the call-in instructions (including audio PIN)

Audience Q&A

- Submit your questions using the “Questions” box in your webinar control panel
- We will answer questions at the end of the presentation



Welcome

Today's Speakers:

John Putman

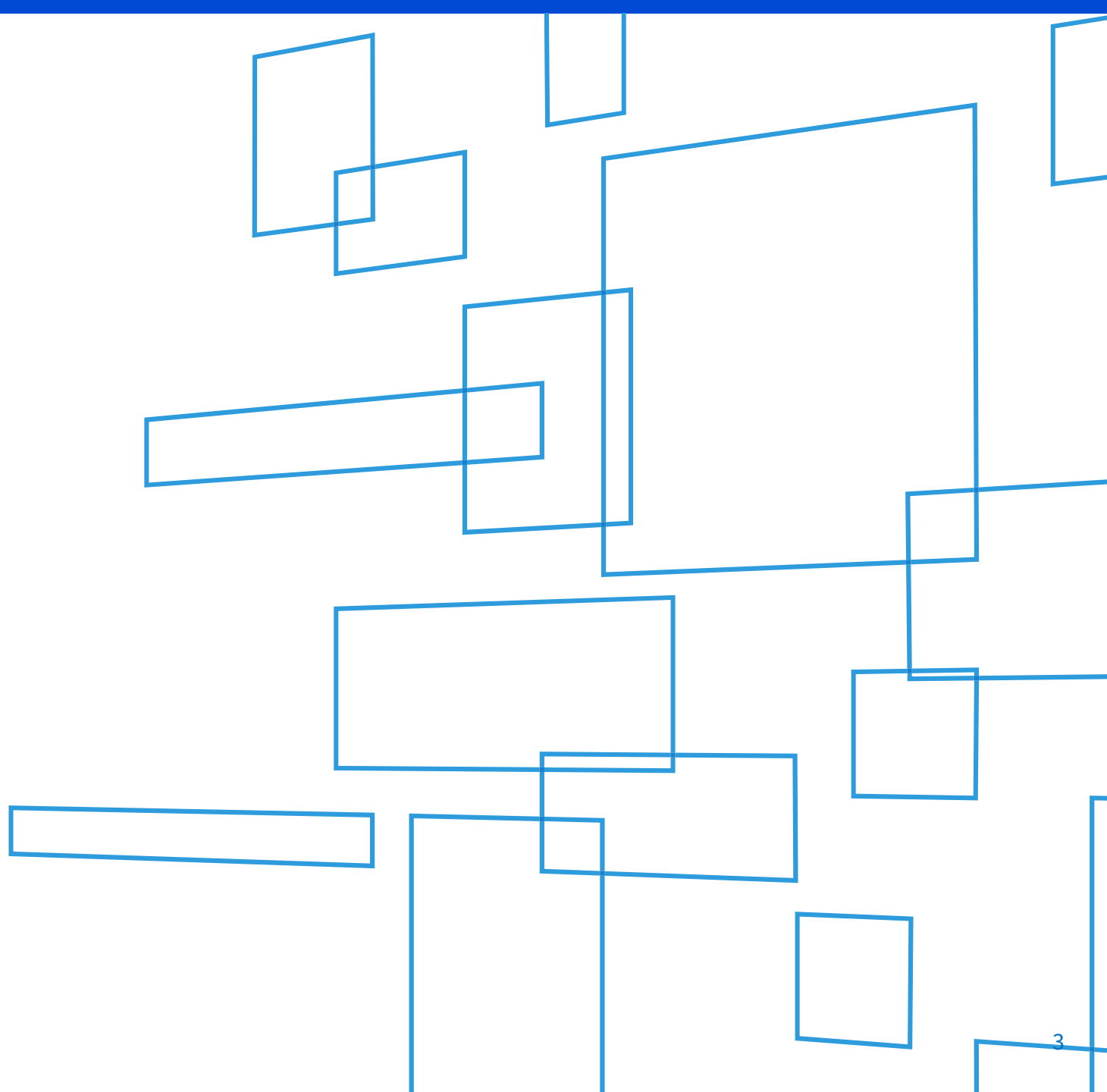
Communications Specialist
Stakeholder Engagement and Outreach

and

Phil Conradt

Senior Product Manager

High Cost



Connect America Program

Program Goals

- Preserve and advance universal availability of voice service
- Drive universal availability of modern networks capable of providing voice and broadband service to homes, businesses and community anchor institutions
- Drive universal availability of modern networks capable of providing advanced mobile voice and broadband service
- Ensure that rates for broadband and voice services are reasonably comparable in all regions of the nation
- Contain administrative costs and minimize the universal service contribution for consumers and businesses through efficient, effective program management

Connect America Program

Modernization of the High Cost Program Creates the **Connect America Fund**

Since 2011, a series of FCC modernization orders has radically transformed the High Cost Program to create the **Connect America Fund**

Legacy

- High Cost
- Voice
- Maintaining service
- Cost-based funding
- Forms-based reporting requirements
- Beneficiary audits
- Compliance

Modernized

- Connect America
- Voice and broadband
- Maintaining and expanding service
- Incentive-based support
- Systems-based portal
- In-program deployment verification
- Success

CAF II Auction

- Through the CAF II Auction Program, the Commission awarded funding to carriers to deliver voice and broadband service to a certain number of funded locations in certain High Cost price cap areas.
- The number of funded locations was determined by the Connect America Model (CAM) and the defined deployment obligation of each bidder was set at the state level.
- As of September 2020, the FCC had authorized 194 winning bidders to receive more than \$1.47 billion in support over 10 years in exchange for their commitments to serve a total of 702,745 locations in 45 states.

What is ELAP?

- **Eligible Locations Adjustment Process**
 - voluntary challenge process established by the FCC
 - facilitates post-auction review and potential adjustment of defined CAF II Auction deployment obligations – and associated support – on a state-by-state basis when, based on a preponderance of the evidence, the total number of funded locations exceeds the total number of actual locations
 - ELAP is open to CAF II Auction winners (“Participants”) and Stakeholders
 - Participants are CAF II Auction winners seeking to reduce their deployment obligation
 - Stakeholders include individuals, entities and governing authorities with direct interests in receiving broadband service in areas eligible for funding
 - CAF II Auction winners and outside stakeholders will submit information through the new **ELAP Module**

How ELAP Works: Participant Submission

- ELAP will start with a one-time collection from Participants of certain location information for all qualifying CAF II Auction locations for a state
 - Location information includes address, lat/long coordinates and, if applicable, number of units
 - Qualifying locations include residential housing units or small businesses served by mass-market Internet service
- Participants may also submit location information for prospective locations
 - Prospective locations are locations that the carrier may want to serve in the future and count toward total defined build-out obligations
- Qualifying locations and prospective locations are together referred to as “eligible locations”

How ELAP Works: Participant Submission (cont.)

- Participants may submit location information for locations they have identified as ineligible
- Participants must submit a description of methodology used and supporting evidence, or an explanation of why supporting evidence is unavailable or unnecessary, demonstrating that their location counts are complete and that no further qualifying locations could be found
 - Examples of acceptable supporting evidence include web-based photography, print outs from E911 and tax databases, real estate records
- Participants will have at least 90 days to upload this location information into the ELAP Module

How ELAP Works: Publication of Location Information

- Within 60 days after the Participant submission filing window closes, the FCC will release a list of Participants that have provided the necessary information to take part in ELAP, along with certain location information in their filings
- USAC will use certain location information to populate a public map
- Prospective Stakeholders can view the ELAP Map to determine whether to submit challenges

How ELAP Works: Establishing Stakeholder Eligibility

- Stakeholders must establish their identity and eligibility to participate in ELAP
 - Stakeholders must demonstrate that they have a direct interest in obtaining broadband within the area eligible for CAF II funding
 - Examples include property or relevant commercial interest
 - **Stakeholders must also certify that they do not hold a controlling interest in a competitive service provider**
 - Governing authorities must establish that their jurisdiction covers at least some part of the service area
- USAC will collect information from prospective Stakeholders to verify eligibility and identity using a third-party commercial verifier
 - After Stakeholders submit this information, the ELAP Map will no longer be publicly available

How ELAP Works: Access to Confidential Information

- Stakeholders may want to access information in Participant ELAP submissions that is not publicly available and presumptively confidential
 - Examples include Participant methodology for identifying eligible locations and supporting evidence files
- Stakeholders may access this information only under the terms and conditions of an FCC Protective Order and the ELAP Order
- Participants also can only access information submitted by Stakeholders under the terms and conditions of an FCC Protective Order
- Information submitted by Stakeholders will be treated as presumptively confidential, except for information used to update the ELAP Map

How ELAP Works: Stakeholder Challenge

- Following publication of the ELAP Map, Stakeholders will have 90 days to submit challenges
- Challengers must supply location information for locations that they have identified as missing from, or inaccurately reported in, Participant filings
 - Location information includes addresses, geo-coordinates and, if relevant, number of units
 - Stakeholders must separately identify qualifying and prospective locations
 - Stakeholders must describe their methods for identifying locations and some supporting evidence
- USAC will use certain location information submitted by Stakeholders to populate the ELAP Map, which will be made available only to the relevant Participant and any other Stakeholders filing challenges in the same service area
- Participants cannot respond to Stakeholder challenges during this challenge window

How ELAP Works: Participant Response

- Participants facing a challenge will have 30 days after the Stakeholder challenge window closes to access and review certified data submitted by Stakeholders and to submit additional information in response to challenges
- Participants that do not oppose a Stakeholder challenge need not submit any additional information
- Participants cannot submit any additional information after the response window closes

How ELAP Works: Adjudication

- The FCC will adjudicate all ELAP requests for adjustment of defined deployment obligations (and associated support and Letter of Credit obligations) based on the “preponderance of the evidence” standard
- FCC will only adjust deployment obligations if, based on the record, it is more likely than not that the defined deployment obligation is greater than the number of actual locations within a state.
- The FCC will issue adjudication orders on a rolling basis as decisions are made
- **Participants are not required to serve every eligible location identified in their ELAP filings, but must meet any adjusted defined deployment obligations**

ELAP Resources

ELAP Resources Page on the High Cost Website:

<https://www.usac.org/high-cost/funds/caf-phase-ii-auction/eligible-locations-adjustment-process-elap/>

CAF II Auction Fund Page on the High Cost Website:

<https://www.usac.org/high-cost/funds/caf-phase-ii-auction/>

CAF II Auction Information Page on the FCC Website:

<https://www.fcc.gov/auction/903>

FCC ELAP order:

<https://docs.fcc.gov/public/attachments/DA-19-1165A1.pdf>

A man with a beard is shown in profile, looking at a tablet device. He is standing in a field of solar panels. The background shows a cloudy sky. The entire image has a blue tint.

Eligible Locations Adjustment Process: An Overview of the ELAP Module



Universal Service
Administrative Co.

October 20, 2020

ELAP Module Participant Functionality

- Locations Data Files

DO NOT INCLUDE PII (Personally Identifiable Information)

1. File contains information describing specific eligible locations using geographic data, including, among other data, geo-coordinates and addresses (or reasonable alternatives), as specified in the LocationsDataUploadTemplate.csv.
2. Locations must be more than 36' apart from one another; if the Locations are closer than 36', the filer must explain why the reported coordinates should be treated as separate locations in the 'Location Distance Comment' field of the template.
3. Ineligible locations require a reason code
4. One LocationsDataUploadTemplate.csv file per SAC

ELAP Module Participant Functionality

- Evidentiary Support Files

PII (Personally Identifiable Information) MUST BE REMOVED

1. File(s) contain evidentiary support for treating reported locations submitted in the Locations Data Upload Template as eligible locations, or show cause why supporting evidence is not needed or unavailable.
2. Must be one of the following file types **MAX FILE SIZE is 30 MB / FILE**
 - .pdf
 - .jpg
 - .png
 - .csv
3. Polygon Shapefile Formats ZIP folder accepted (.shp, .shx,.dbf,.prj,.sbn, .sbx, .cpg,.xml) **MAX is 1 GB / FOLDER**
4. Multiple files per SAC permitted

ELAP Module Participant Functionality

- Methodology Files

1. Must be one of the following file types **MAX FILE SIZE is 30 MB / FILE**
 - .pdf
 - .jpg
 - .png
 - .csv
2. File must describe methodology for identifying all locations within the SAC that qualify for universal service support.
3. One file per SAC

ELAP Module Participant Functionality

- Manage Uploads Page
- Help Resources
- Upload Three File Types
 - Locations Data
 - Evidentiary Support
 - Methodology

Universal Service Administrative Co. Eligible Location Adjustment Process

Manage Uploads

18 days left to submit and certify your state filing(s). Deadline: 11/02/2020

The ELAP module allows you to upload your locations, evidentiary support, and methodology files at the state level. For detailed instructions on how to create a filing for your state, please select the 'Detailed Filing Instructions' link under Help with Uploading.

To begin your upload, follow the steps listed below.

- 1. Select a State**
- 2. Select a SAC**

Help with Uploading

[Detailed Filing Instructions](#)

[Locations Data Upload Template](#)


- 3. Select a File Type**
- 4. Select a File for Upload**

ELAP Module Participant Functionality

- Manage Uploads Page
- Uploaded Files



[Uploaded Files](#) [Certify Data](#)



Select a State

All 

Directions: There must be at least one (1) file for Locations, Methodology and Evidentiary Support to Certify a state package.

Displaying 1-3 of 3 files

State	SAC	File Name	File Type	Uploaded	Progress	Created by	Locations Errors	Actions 
IA	359146	359146 IA AMG Tech Notep...	Location Data	10/16/2020 08:31:54 AM	Completed	Phil.Conradt@u...	 4000 87 errors	Download Error Log Delete
IA	359146	ELAP User Guide_v1.01.pd...	Methodology	07/24/2020 03:09:13 PM	Completed	Phil.Conradt@u...	-	Download Delete
IA	359146	ELAP User Guide_v1.01.pd...	Evidentiary Support	07/24/2020 03:09:01 PM	Completed	Phil.Conradt@u...	-	Download Delete

Show files/page  **1**  of 1 pages

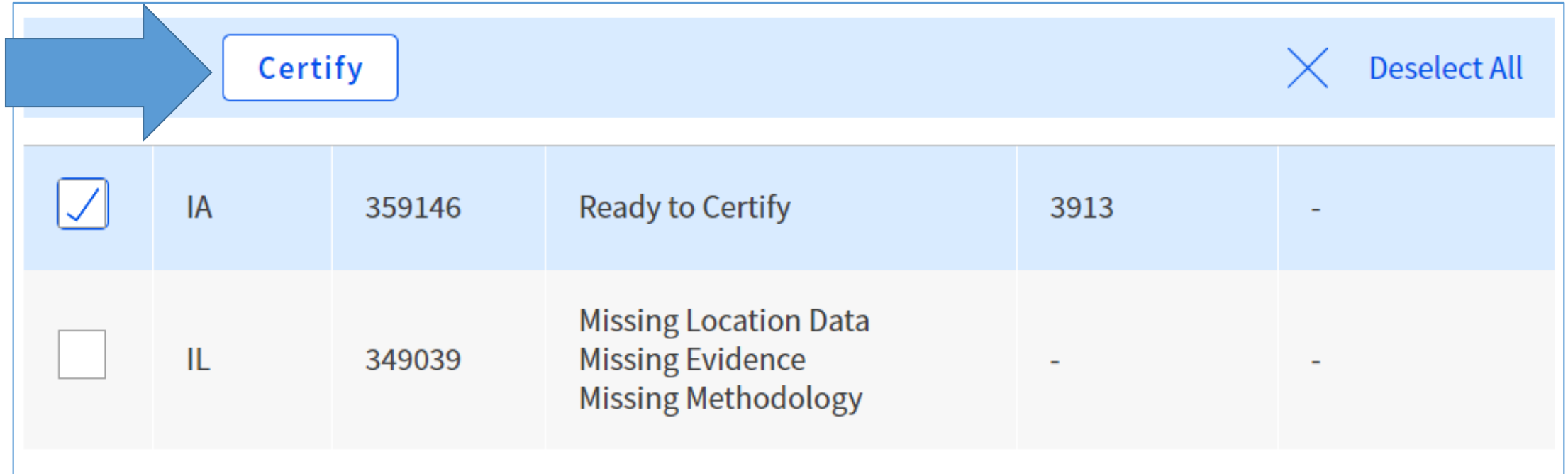
ELAP Module Participant Functionality

- Manage Uploads Page
- Certify Data

Uploaded Files		Certify Data			
Filter by Filing Status					
All ▼					
<input type="checkbox"/>	State	SAC	Filing Status	Locations	Certified On
<input type="checkbox"/>	IA	359146	Ready to Certify	3913	-
<input type="checkbox"/>	IL	349039	Missing Location Data Missing Evidence Missing Methodology	-	-

ELAP Module Participant Functionality

- Manage Uploads Page
- Certify Data



The screenshot displays a user interface for certifying data. A large blue arrow points to a 'Certify' button. To the right of the button is a 'Deselect All' link with a close icon. Below these elements is a table with two rows of participant data.

<input checked="" type="checkbox"/>	IA	359146	Ready to Certify	3913	-
<input type="checkbox"/>	IL	349039	Missing Location Data Missing Evidence Missing Methodology	-	-

ELAP Module Participant Functionality

- Manage Uploads Page
- Certify Data

Sign and Certify

I certify that, as an employee or agent or the participant, my responsibilities include ensuring the truthfulness and accuracy of statements and evidence submitted into the Eligible Locations Adjustment Module (ELAP); I attest, under penalty of perjury, that the participant has engaged in due diligence to verify the truth and accuracy of statements and evidence presented in ELAP; and that, to the best of my knowledge and belief, all such statements and evidence are true and accurate.

Enter your name to digitally sign your certification.

Your Signature

Phil Conradt

[Cancel](#) [Submit Certification](#)

Certification Confirmation

✔ You've successfully submitted your certification!

Confirmation #: ELAPCERT-409592525

Certified on: 06/26/2020 06:06:54 PM

Certified by: Phil.Conradt@usac.org

View your certification details by filtering for "Certified" on the Certify Data table.

If you have questions or concerns about this certification, contact us at HC_IT_ELAP_Dev@usac.org, referencing the above number.

[Print](#) [OK](#)

Revert Certification

The information submitted for the State and SAC you have selected have already been certified. To make changes to this information, you must withdraw your certification of the truth and accuracy of this information by entering your full name below, and then digitally signing by clicking "continue".

Please note that once the certification is withdrawn, the State/SAC reverts to a Ready to Certify status. You must return to the manage uploads page to finalize your submissions (by making any necessary changes) and then recertify the information for the State and SAC for your filing package to be considered complete.

Enter your name to digitally acknowledge you are reverting the certification.

Your Signature

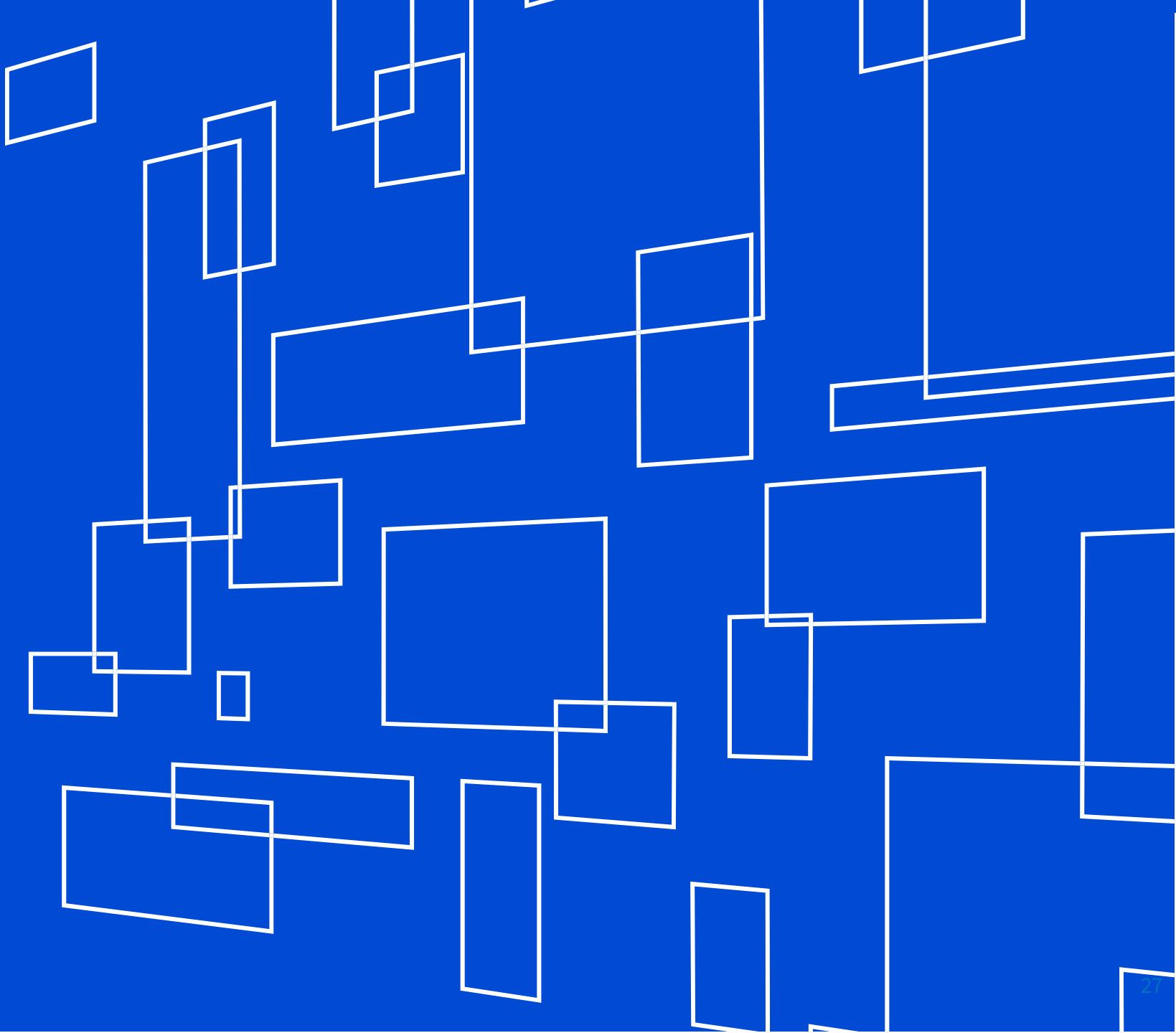
Phil Conradt

[Cancel](#) [Continue](#)

ELAP Module Participant pre-Testing

- Optional, non-binding, pre-Testing from Oct 19-Nov 16
- If interested send e-mail: elap@usac.org
- All records will be destroyed at the conclusion
- Opportunity to get a head start with learning functionality and testing file validation
- Limited number of ‘dummy’ files available if needed

Questions?



ELAP Module Participant Functionality

- Locations Data Files List of Fields (*Required)

Study Area Code*

Latitude*

Longitude*

Location Distance Comment – Required if distance between two locations is < 36’

Address*

City*

State*

Zip Code*

of Units*

GPS Method* - 1, 2 or 3

GPS Method as of date - MM/DD/YYYY (within 13 months)

Location Type* - 1,2 or 3

Ineligible Reason (IR) – 1-7

Ineligible Reason Comment - Required if IR is 7 (Other)

Location_type_id	Description
1	Field Research
2	Computer-based geolocation
3	Automated address geolocation

Ineligible_reason_id	Description
1	Empty Parcel/Under Development
2	Group Quarters
3	Permanently Vacant
4	Community Anchor Institution
5	Recreational, non-residential, structure
6	Storage or Agricultural use
7	Other