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Connect America Fund (CAF) Compliance Process Update

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Agenda

- Introduction
- HUBB: Tracking Broadband Deployment
- Verification Reviews: Confirming Broadband Deployment
- Network Performance Testing: Measuring Speed and Latency
- What's Next – Upcoming Changes

Please be sure to closely monitor FCC orders and public notices, as well as the USAC website and USAC communications, for important updates that may clarify or otherwise modify the information presented in this slide deck.



Who Are You?

High Cost Program

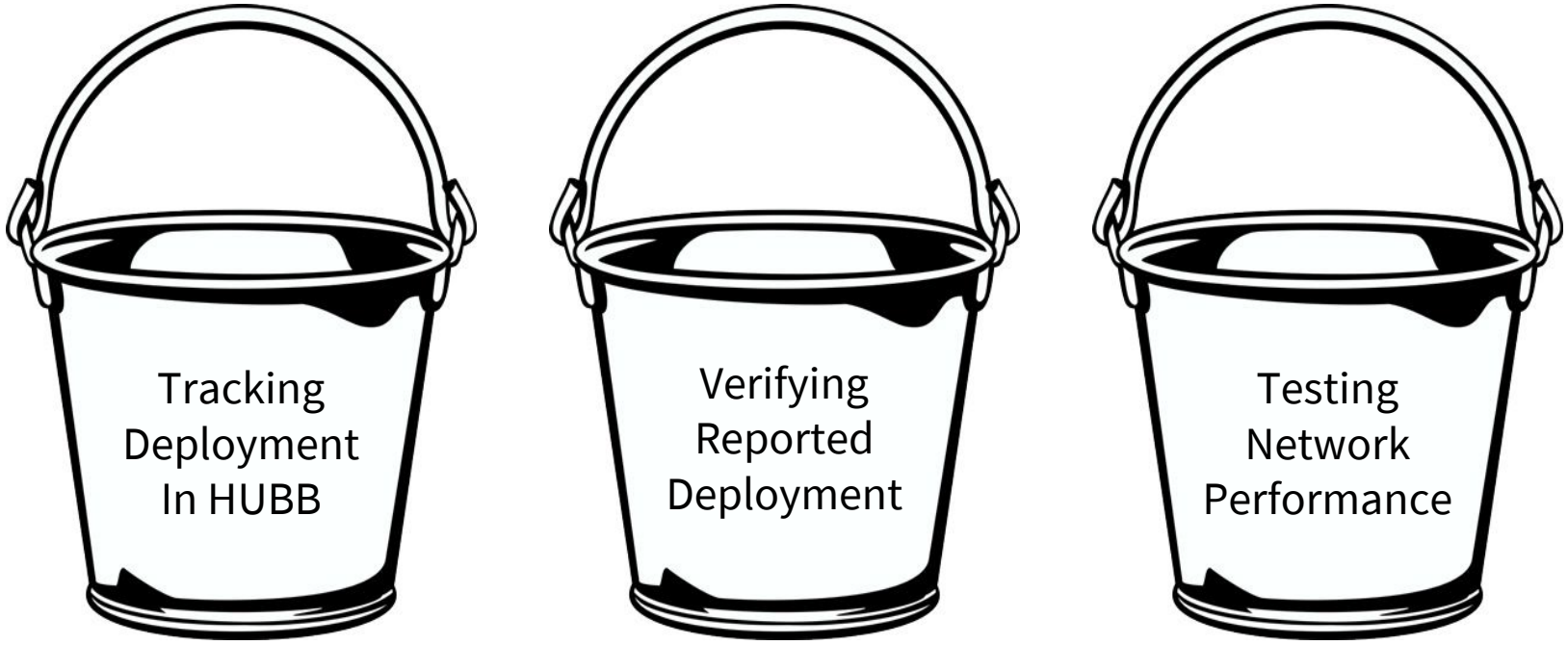
- High Cost ensures universal availability of essential telecommunications services in rural America.
- Program consists of more than 15 separate funds that distribute billions of dollars annually to carriers to provide voice and broadband service — both fixed and mobile — in rural areas that would otherwise be unserved or underserved by the private sector.
  - See the High Cost funds pages for individual fund descriptions and details.
  - Carriers must offer service at rates reasonably comparable to those available in urban areas.
- Legacy funds subsidize voice service to ensure universal access to basic telephone lines.
  - Legacy funds calculate support based on carrier costs and are subject to USAC financial audits (to be covered in separate presentation).
- 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 advanced network infrastructure and delivering reliable high-speed internet access.

High Cost and the Connect America Fund

- The Connect America Fund consists of roughly a dozen modernized funds that use incentive-based cost models and competitive bidding to award set monthly payments to carriers to deploy and maintain robust communications networks in areas eligible for support.
  - Networks must provide voice service and broadband at required speeds.
- 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 carriers, fixed wireless internet service providers and satellite providers.
- Compliance process for modernized funds is focused on confirming that carriers are bringing broadband to rural America as required.

Connect America Fund Compliance Process

USAC closely monitors carrier compliance with deployment obligations to ensure carriers are using support to build out high-speed internet access that meets minimum speed and latency standards to required location counts by relevant milestone deadlines in rural areas eligible for funding.



Carriers may also be subject to site visit audits following final deployment milestones.

This compliance framework safeguards program accountability, transparency and integrity.

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HUBB Portal
Tracking Broadband Deployment

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HUBB Portal: Tracking Broadband Deployment

- Carriers in modernized funds with defined fixed broadband build-out obligations must file data with the High Cost Universal broadband (HUBB) portal by March 1 annually showing where they deployed service using CAF support in the prior calendar year or certify “no locations” to upload (no deployment).
- Carriers must also complete annual certification to confirm that filing activity for prior year is complete.
- 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 and is the foundation for the FCC Broadband Data Collection (BDC) and National Broadband Map; 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.
    - Carriers must provide a reason for any unserved locations on their required locations lists.

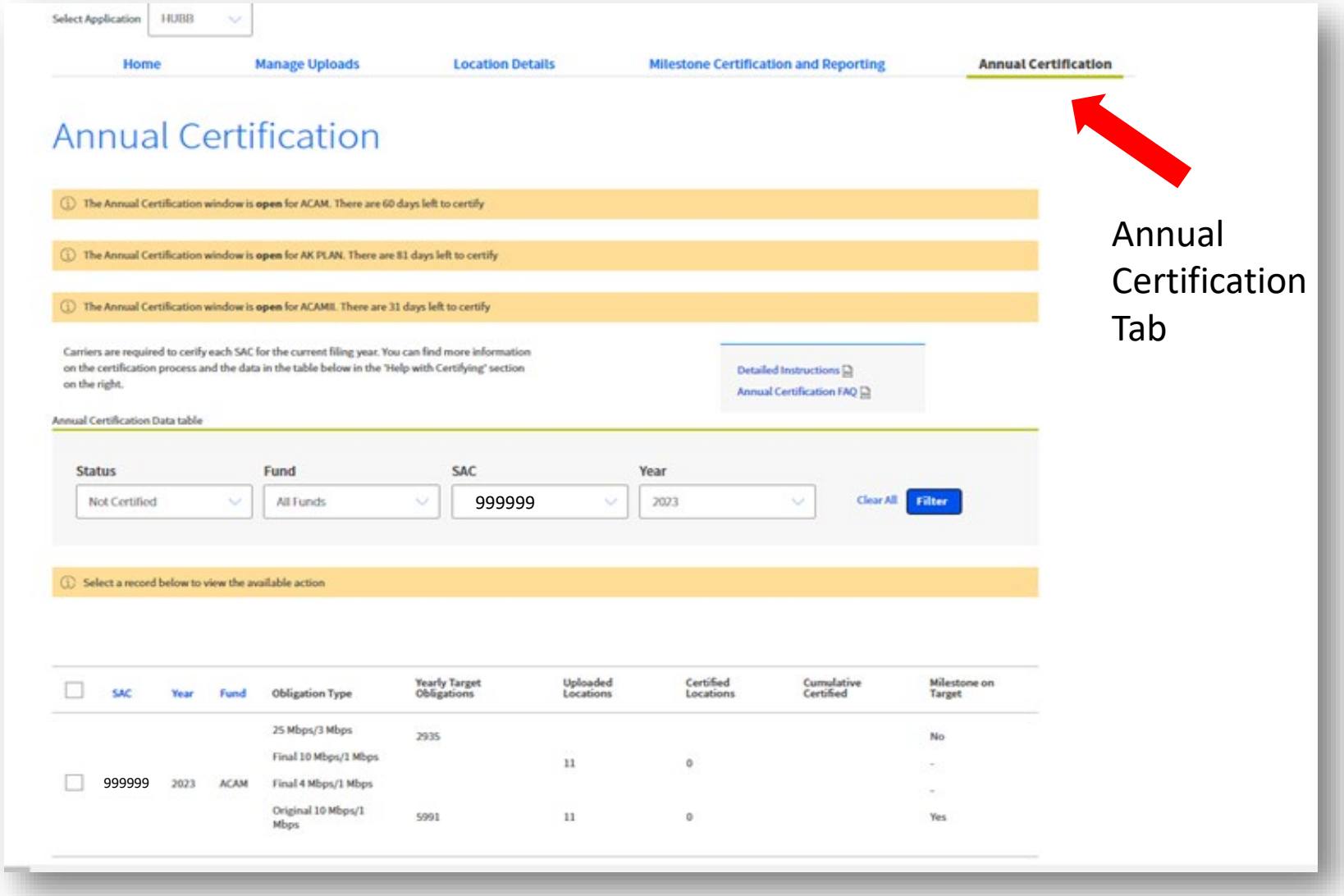
HUBB Portal: Tracking Broadband Deployment

- 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 (for carriers that report by lat/long and address) **or** that the reported Fabric location ID is active and funded – i.e., included on a carrier's required locations list (for carriers that report by Fabric location ID)
  - 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.
  - Carriers that miss a deployment milestone must notify the FCC, USAC and relevant state and Tribal governments within 10 business days of milestone deadline (early January for year-end milestone).
  - Carriers that miss deployment milestones are subject to increased reporting obligations and potential withholding/recovery of support.

HUBB Portal: Certifying Broadband Deployment

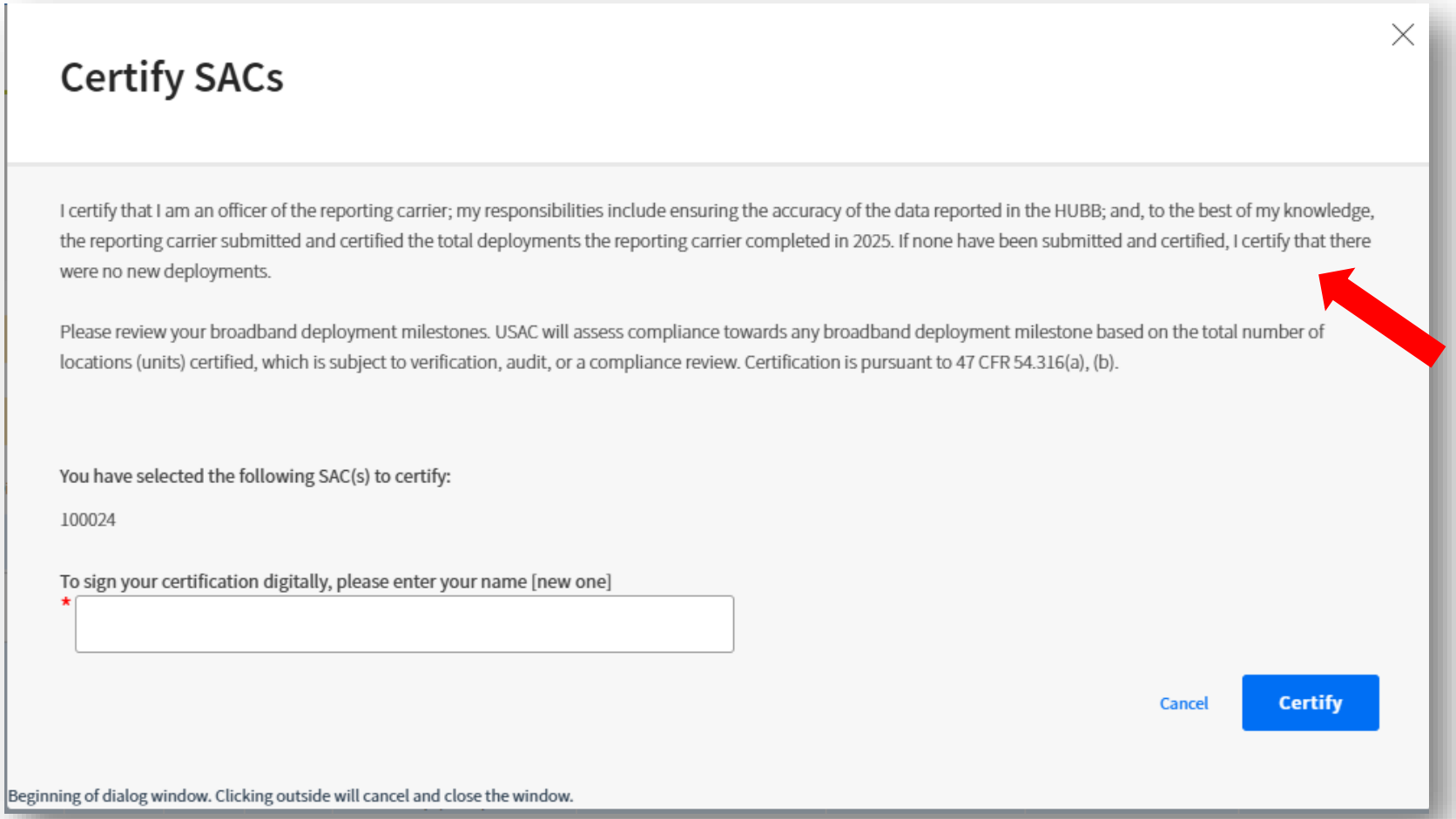
- Carriers have until **March 1, 2027**, to file and certify data for locations deployed with CAF support in calendar year 2026. Carriers can file and certify locations in the HUBB throughout the year.
- Carriers must also complete a separate annual certification in the HUBB between **Jan. 1, 2027, and March 1, 2027**, to confirm that their filing activity for calendar year 2026 is complete.
  - As part of this annual certification, carriers that did not deploy any locations in 2026 must still log into the HUBB and certify "no locations to upload" between **Jan. 1, 2027, and March 1, 2027.**
  - Annual certification functionality is only turned on in the HUBB **between Jan. 1, 2027, and March 1, 2027.**
- Carriers with 2026 deployment milestones no longer need to complete a separate milestone certification.
  - The HUBB will automatically complete milestone certifications on the backend for carriers that certify enough locations as part of the annual filing process. This includes separate milestone certifications for separate deployment obligations by speed tier.

HUBB Annual Certification



Annual Certification Tab

HUBB Annual Certification



Includes No Locations Certification

HUBB Portal: Late Filings

- Carriers will see a reduction of at least seven days of support for a late HUBB Annual Certification. After seven days following the deadline, USAC will continue to reduce support on a day-by-day basis, plus an additional seven days, until required certification is complete.
- FCC grants a one-time, four-day grace period for a late HUBB certification.
- If a carrier discovers locations deployed during prior years that it failed to certify by the HUBB filing deadline, it should submit and certify those locations in the HUBB as soon as possible to count them toward deployment obligations.
    - A carrier may be subject to support reduction based on number of locations reported late as a percent of total locations reported and number of days after filing deadline that they are submitted.
    - FCC grants carriers a one-time grace period to certify late-reported locations without penalty.
    - FCC does not reduce support for late-reported locations if a carrier has demonstrated compliance with its final deployment milestone.

HUBB Portal: Filing by Lat/Long Coordinates and Addresses

- Carriers in these funds have until **March 1, 2027**, to file data for locations deployed in 2026 or certify "no locations to upload," and report deployment data using **lat/long coordinates and addresses**:
  - **Alternative Connect America Cost Model (Original ACAM)**
  - **Revised ACAM**
  - **ACAM II**

HUBB Portal: Filing by Lat/Long Coordinates and Addresses

- Carriers in these funds have until **March 1, 2027**, to file data for locations deployed in 2026 or certify "no locations to upload," and report deployment data using **lat/long coordinates and addresses**:
  - **Alaska Plan**
    - All Alaska Plan carriers are subject to a 10-year service milestone certification at the end of 2026.
      - This includes Alaska Plan carriers that have individualized performance plans requiring them only to maintain service at existing levels and do not have defined deployment obligations and therefore are not required to file in the HUBB.
        - USAC still encourages these carriers to certify annually that it did not deploy service to any new locations during the previous year.
    - Alaska Plan carriers must also submit node and link data for middle-mile fiber and microwave networks through the Middle Mile portal (inside the HUBB).
      - An Alaska Plan wireline carrier must certify middle-mile data on behalf of its wireless affiliate.

HUBB Portal: Filing by Lat/Long Coordinates and Addresses

- Carriers in these funds may not have new deployment to report for 2026 but should keep their HUBB data up-to-date, and report deployment data using **lat/long coordinates and addresses**:
  - **Connect America Fund (CAF) Phase II Auction (CAF II Auction)**
    - Carriers must continue to make updates or corrections to deployment data in the HUBB to ensure accuracy. Carriers were required to be fully deployed by the end of 2025, but program continues to pay out support.
  - **Connect America Fund-Broadband Loop Support (CAF BLS)**
    - Carriers are not required to file in the HUBB for 2026. The FCC has deferred the start of the next five-year deployment obligation term for the fund. (See FCC 23-118 and DA 25-75)
    - Carriers should keep deployment data in HUBB up-to-date, and maintain coverage footprint.
  - **Rural Broadband Experiments (RBE)**
    - Carriers are not required to file in the HUBB for 2026 since program is ending, but system remains open for corrections, etc.

HUBB Portal: Filing by Fabric Location ID

- Carriers in these funds have until **March 1, 2027**, to file data for locations deployed in 2026 or certify "no locations to upload," and report deployment data using **Fabric Location IDs**:
  - **Enhanced ACAM**
    - Third year reporting deployment data in HUBB using Fabric locations IDs.
  - **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**
    - Second year reporting deployment data in HUBB using Fabric locations IDs.
    - RDOF and PR/USVI Funds carriers no longer report deployment data in HUBB by address and lat/long.
    - Carriers had until March 2, 2026, to (re)submit deployment data using Fabric Location IDs for locations already reported in HUBB in the past using addresses and lat/long coordinates.

HUBB Portal: Filing by Fabric Location ID

- Carriers in these funds have until **March 1, 2027**, to file data for locations deployed in 2026 or certify "no locations to upload," and report deployment data using **Fabric Location IDs**:
  - **Carriers receiving PR/USVI Funds Stage 2 Fixed Support** must also report data on cumulative network miles deployed as of end of 2026 to strengthen, harden and improve the redundancy and resiliency of their fixed networks.
    - PR/USVI Funds must email HCCerts@usac.org by March 1, 2027, with the following deployment data as of Dec. 31, 2026, for each municipio or geographic area for which they won support:
      - Buried fiber miles
      - Aerial wireline miles that use composite poles
      - Aerial wireline miles that use standard poles
      - Miles of fixed wireless coverage
      - Miles of backup or redundant networks

HUBB Portal: Fabric Location Lists

Fabric required locations lists are updated mid-year if there have been carrier mergers, transfers or defaults.
The Fabric version used does not change.

Fund	List Status	Fabric Version	Last Updated	Next Planned Update
Enhanced ACAM	Final	v4 & v5	January 2026	December 2026: ACAM Locations (October 2026)
Puerto Rico	Final	v8	January 2026: Bringing Puerto Rico Together (1/16/26)	Last Updated January 2026 No Further Updates Planned
US Virgin Islands	Final	v8	January 2026: Connect USVI (1/16/26)	Last Updated January 2026 No Further Updates Planned
RDOF	Interim	v8	October 2026: Rural Digital Opportunity Fund (Dec 2025 list updated with mergers, transfers and defaults in 2026)	Q1 2027 with Fabric v10

HUBB Portal: Fabric Reason Codes

- Carriers must account for all locations on their required locations list and ideally serve all required locations.
- But sometimes circumstances prevent carriers from serving a particular location.
- The HUBB provides ability for carriers to report specific locations as Not Served, but still accounted for, for one of the following reasons:

Reason Code Value	Description	Explanation
1	Location Served	Provider has deployed service as required
2	Unserved – Not a BSL	Provider has won a Fabric location challenge not yet reflected on the map; including locations destroyed due to a natural disaster
3	Unserved – Program Change	Change in funding program that no longer requires provider to deploy to the location, such as an eligible area change
4	Unserved – Project Change	Provider's project has changed, such as construction, permit, right of way issues

HUBB Portal: Ensuring Consistency with BDC/Fabric Data

- Deployment data submitted and certified in the HUBB should be consistent with fixed-broadband deployment data submitted in the FCC Broadband Data Collection (BDC), which is used to update the National Broadband Map.
- Fabric is the foundation for both the BDC and National Broadband Map.
- USAC and the FCC use the most recent version of the National Broadband Map to cross check deployment submitted to the BDC with deployment submitted and certified in the HUBB. This applies to locations filed using addresses and lat/long coordinates and locations filed by Fabric location ID.
- Carriers must be prepared to explain and, if necessary, correct discrepancies between the datasets by:
  - Modifying or removing locations from their HUBB filings to better align with their BDC submissions.
  - Or filing a challenge to the Fabric if it believes the Fabric is inaccurate or incomplete.
    (See FCC DA 25-32, para. 16)

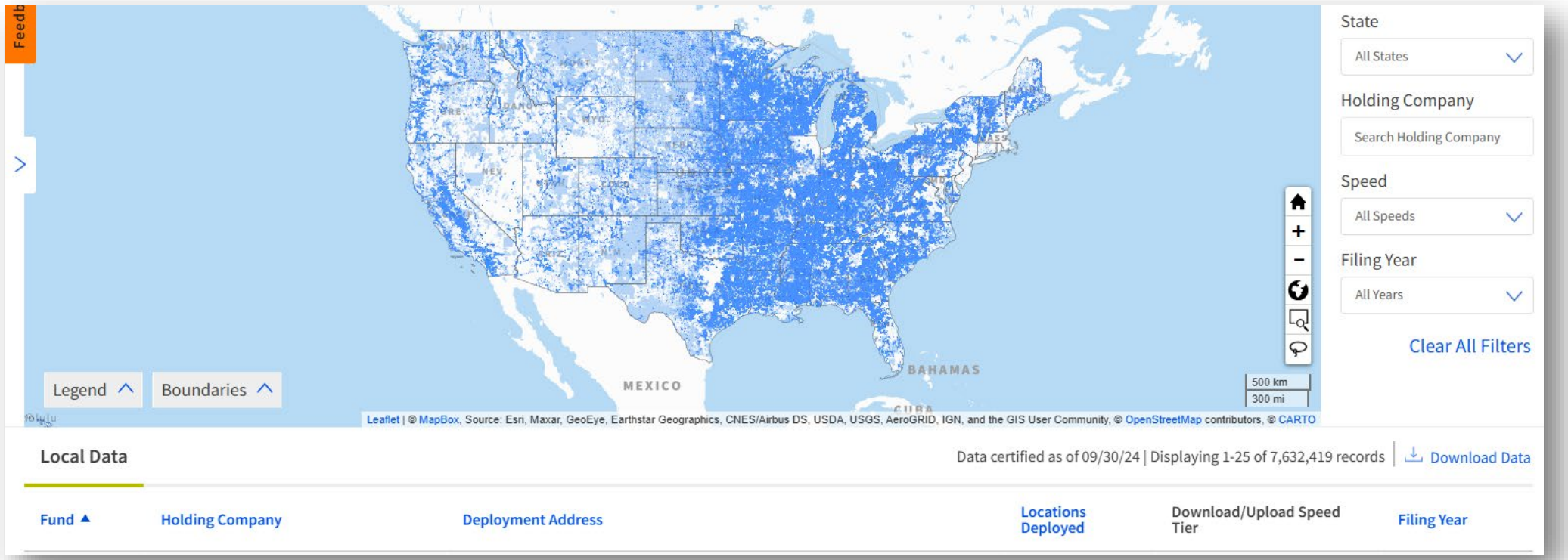
HUBB Portal: CAF Map and CAF State Map

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.
- 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.
- 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 reported by carriers using addresses and lat/long coordinates. CAF State Map also includes deployment reported by carriers using Fabric Location IDs.
    - See the Broadband Funding Map for deployment obligations and broadband availability coverage (from the National Broadband Map) for carriers in funds not included in the CAF Map.

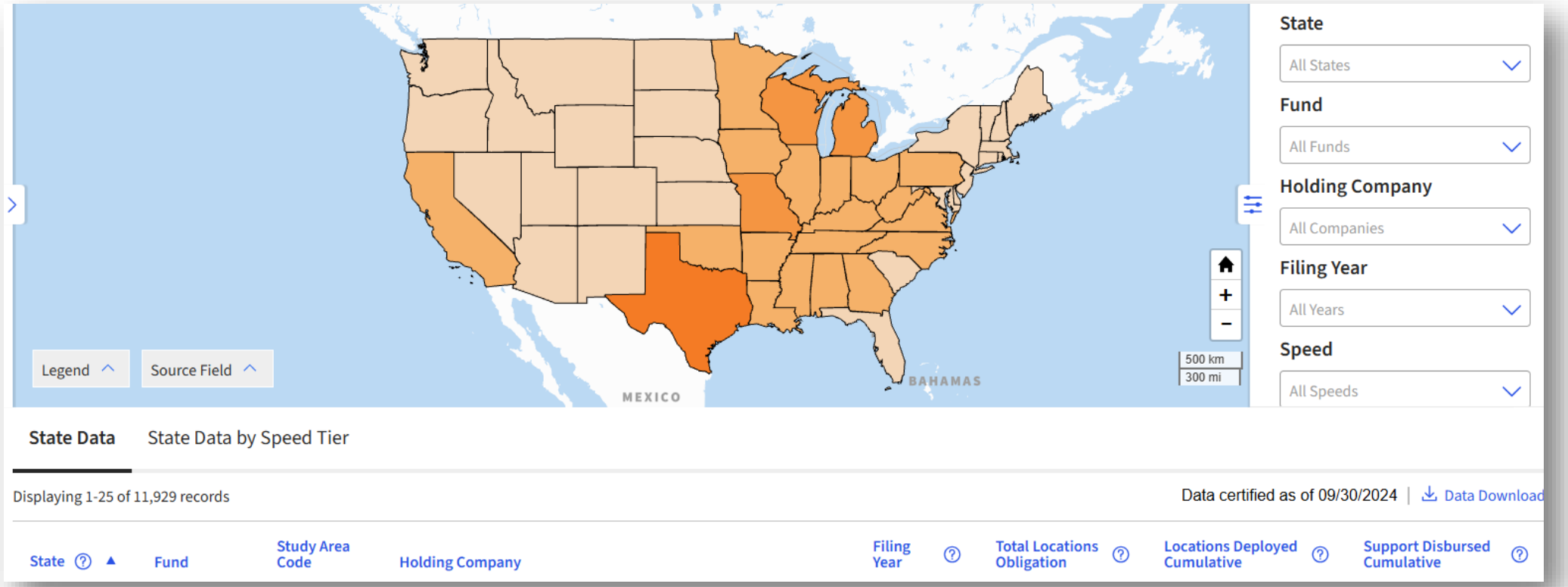
Connect America Fund Broadband Map

The CAF Map 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.



Connect America Fund State Broadband Map

The CAF State Map 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.



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

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Verification Review
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.
- Following each fund's final, 100 percent deployment milestone deadline, carriers have a one-year "cure period" to make up any deployment shortfalls and address any compliance gaps.

Verification Reviews: Deployment Milestones by Fund

- Carriers in the following funds have mandatory deployment milestones at end of 2026 and may face verification reviews tied to those milestones in 2027:
  - **Original ACAM** carriers face a final, 100 percent milestone for deploying 10/1 Mbps, 25/3 Mbps and 4/1 Mbps broadband at the end of 2026 and must be fully built out by the end of the year.
  - **Revised ACAM** carriers face a final, 100 percent milestone for deploying 10/1 Mbps broadband, and an 80 percent milestone for deploying 25/3 Mbps broadband, both at end of 2026.
  - **ACAM II** carriers face an 80 percent milestone for deploying 25/3 Mbps broadband at end of 2026.
  - **Enhanced ACAM** carriers face a 50 percent milestone for required deployment at the end of 2026.
  - **PR/USVI** carriers face an 80 percent milestone for required Stage 2 fixed broadband deployment at the end of 2026.
  - **Alaska Plan** carriers face a 100 percent milestone for required deployment at the end of 2026.

Verification Reviews: Deployment Milestones by Fund

- **RDOF carriers authorized in 2021** have an 80 percent milestone for required deployment at end of 2026 and **RDOF carriers authorized in 2022 or 2023** have a 60 percent milestone for required deployment at end of 2026. RDOF carriers may face verification reviews tied to those milestones in 2027.
  - Any RDOF carrier that misses a required deployment milestone must notify the FCC and provide an explanation within 10 business days of the milestone deadline, and may be subject to quarterly reporting and withholding of support.

Verification Reviews: Deployment Milestones by Fund

- **CAF II Auction** carriers in the compliance gap have a one-year cure period in 2026 and will face verification reviews tied to this cure period in 2027.
  - CAF II Auction carriers had a final, 100 percent milestone for required deployment at end of 2025. Any CAF II Auction carrier that was not fully built out to its obligated location count by Dec. 31, 2025:
    - Has a one-year cure period - to deploy service to any remaining locations by the end of 2026.
    - Must certify this deployment in the HUBB by March 1, 2027, to avoid permanent recovery of support.
      - Following the March 1, 2027, deadline, any CAF II Auction carrier that has failed to meet the 100 percent milestone but has deployed service to at least 95 percent of its required location count can accept a pro-rated recovery of support to avoid being found in default of its deployment obligations. (See FCC DA 25-1004)

Verification Reviews: Confirming Broadband Deployment

- **Verification review objective**: to verify that carrier deployed broadband service meeting FCC performance standards to a qualifying number of locations by 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: Deployment Reported by Lat/Long

- 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. (See FCC guidance at DA 16-1363)
    - 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: Deployment Reported by Fabric ID

- 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: Acceptable Documentation

- Carriers must submit documentation that serves as proof of deployment for each HUBB location record selected for verification review. Examples of acceptable documentation include (but are not limited to):
  - 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
- USAC may also request engineering data (infrastructure data/network maps) or ask carriers to conduct field testing and submit results.

Verification Reviews: Confirming Multi-Unit Deployment

- Verification reviews of multi-unit locations – locations with more than one living unit, such as an apartment building or duplex – will also confirm that the number of units at the location selected for review ties back to the number of units reported for that location in the HUBB.
  - Carriers will be required to submit documentation to prove the existence of each individual unit.
  - Carriers that cannot provide acceptable documentation proving the number of units reported in the HUBB may see a reduction in the number of units counting toward deployment obligations.
- Tips for success:
  - Carriers should not group separate single-unit locations together – using the same latitude/longitude coordinates, but labeled as multiple units at one location – when reporting deployment in the HUBB.
  - Carriers that provide separate broadband connections to multiple structures on a single property, lot or land parcel should report each structure served as a separate location record – with separate latitude and longitude coordinates – in the HUBB.

Verification Reviews: Acceptable Documentation

- Examples of acceptable documentation to prove deployment at a multi-unit location include:
  - Subscriber bills for each individual unit at the location
  - Screen shots from a public-facing service availability tool, or an internal provisioning system, showing upload/download speeds available for each individual unit at the location
  - Screen shots of a mapping software street view or satellite view of the location that provide evidence of the number of units, such images showing two separate entrances or driveways
  - Screen shots from an apartment complex website, property tax website or real estate website (such as Realtor.com, Xome, Trulia, Redfin, etc.) showing the number of units at the location
  - Geotagged photos or video clips (taken using a mobile phone or camera with geotagging turned on) that provide evidence of the number of units at the location, such as images of separate electric meters or separate mailboxes, along with a screenshot of the file properties page for each picture or video that displays the associated latitude/longitude coordinates

Verification Reviews: How the Process Works

- **Step One: Announcement and Data Collection**

  - Following each deployment milestone deadline, USAC selects carriers for verification review.
    - Carriers must contact hcverifications@usac.org to initiate an on-demand milestone verification review after certifying deployment data in the HUBB.
  - For each carrier, USAC selects a statistically valid, random sample of locations certified in the HUBB for review.
  - USAC sends announcement letters to carriers identifying sampled locations and requesting documentation to prove deployment.
  - Carriers cannot edit or modify HUBB records for locations selected for review.

Verification Reviews: How the Process Works

- **Step Two: Document Review and Testing**

  - USAC encourages carriers to send documentation as it becomes available, rather than waiting to provide everything at once.
  - Documentation will be unique to each carrier and may vary by region of the country.
  - Carriers may need to submit more than one piece of evidence to prove location, speed and date of service availability for a particular HUBB record.
  - USAC reminds all carriers to retain all records and analysis needed to demonstrate that Universal Service support is being used in accordance with High Cost Program rules. (See 47 CFR Section 54.320(b))

Verification Reviews: How the Process Works

- **Step Three: Conclusion**

  - When the verification process is complete, USAC holds exit conferences with carriers selected for review to provide details of findings.
  - USAC sends closure letters summarizing findings and carriers have an opportunity to respond.
  - Carriers found to have missed milestones face increased reporting obligations and potential loss of support.

Verification Resources

For more information about verification reviews, 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

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Network Performance Testing
Measuring Speed and Latency

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Network Performance Testing: Measuring Speed and Latency

- 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 year at a USAC-selected random sample of CAF-supported subscriber locations for each obligated speed tier.
  - Carriers must conduct testing throughout support term and obtain new sample every two years.
- 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 it 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 required quarterly 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 deadlines may face permanent loss of support.

Network Performance Testing: Measuring Speed and Latency

- Before official testing begins, carriers must conduct a year of quarterly “pre-testing.”
  - Carriers do not face withholding of support for failing to meet speed and latency standards during pre-testing if they conduct the required testing (one week in each quarter of the calendar year) and submit and certify the required test results – or attest to a lack of subscribers – within two weeks of the end of 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: Measuring Speed and Latency

Performance Measures Module (PMM):

- 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

Network Performance Testing: Obligations by Fund

- Carriers in these funds began quarterly pre-testing in 2021 and quarterly official testing in 2022:
  - **Original and Revised ACAM**
  - **Rural Broadband Experiments (RBE)**
  - **Alaska Plan**
- **Original and Revised ACAM** carriers must obtain new random samples of CAF-supported subscriber locations for ongoing testing that starts in first quarter of 2027 (PMM cycle year 2027_2028).
  - Original ACAM carriers that are out of compliance can elect to test a statistically valid sample.
- **RBE and Alaska Plan** carriers are now done with testing (since those programs are ending) unless they are out of compliance with FCC speed and latency metrics at the end of 2026.
  - RBE and Alaska Plan carriers that are out of compliance at the end of the year must obtain new and statistically valid random samples of CAF-supported subscriber locations and conduct a year of cure period testing with those samples.
- **Alaska Plan** carriers (and ACS) are transitioning to the new Alaska Connect Fund (ACF) and must also obtain new random samples of CAF-supported subscriber locations for testing that starts in first quarter of 2027 (PMM cycle year 2027_2028).

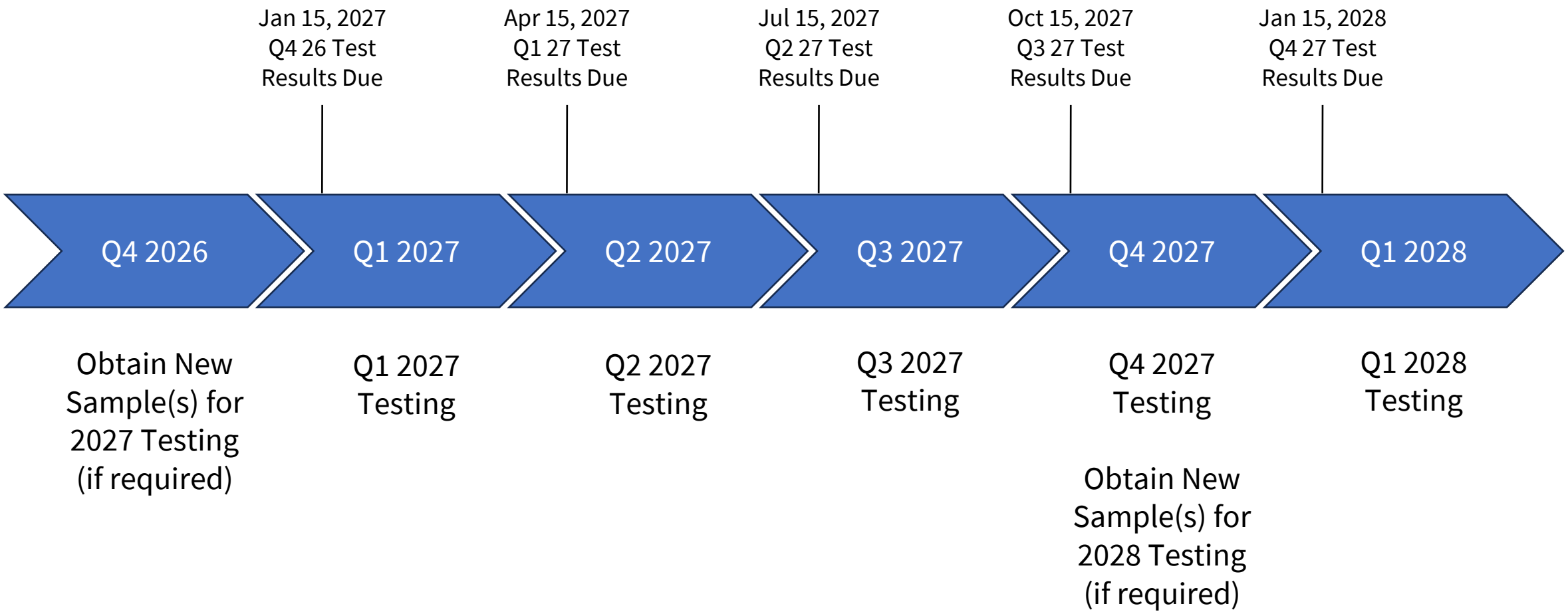
Network Performance Testing: Testing Obligations by Fund

- Carriers in these funds began quarterly pre-testing in 2022 and quarterly official testing of 2023, were required to obtain new random samples of CAF-supported subscriber locations for ongoing testing that started in the first quarter of 2026 (PMM cycle year 2026_2027) and must continue testing with those samples in 2027:
  - **Alternative Connect America Cost Model II (ACAM II)**
  - **Connect America Fund-Broadband Loop Support (CAF BLS)**
  - **Connect America Fund (CAF) Phase II Auction**
- Carriers in the **Enhanced Alternative Connect America Cost Model (Enhanced ACAM)** program began quarterly pre-testing in 2026 and begin quarterly official testing 2027 (PMM cycle year 2026_2027).

Network Performance Testing: Testing Obligations by Fund

- Carriers receiving **Bringing Puerto Rico Together (Uniendo a Puerto Rico) Fund and Connect U.S. Virgin Islands Fund (PR/USVI Funds)** Stage 2 fixed support began quarterly pre-testing in 2024 and quarterly official testing in 2025, and resumed quarterly official testing in the second half of 2026.
- Carriers participating in the **Rural Digital Opportunity Fund (RDOF)** began quarterly pre-testing in 2025 and quarterly official testing in the second half of 2026.
- Because of transition to Fabric Location ID reporting in the HUBB for these funds, the FCC waived testing requirements in first half of 2026 to avoid errors that could have resulted from the upload of test data using an existing sample of CAF-supported subscriber locations reported in the HUBB with addresses and lat/long coordinates.
  - PR/USVI Funds and RDOF carriers were required to obtain new random samples of CAF-supported subscriber locations reported in the HUBB by Fabric Location ID for testing starting in the third quarter of 2026 (PMM cycle year 2026_2027).
  - USAC will calculate 2026 annual compliance with FCC speed and latency metrics using only two quarters of data for the year for carriers in these funds.

Performance Measures – 2027 Timeline



Network Performance Testing: Filing Test Results

- Carriers must submit and certify all test results for full sample of selected locations for each SAC and obligated speed tier combination within two weeks of the end of each quarter.
  - **Deadlines are April 15 (first quarter results), July 15 (second quarter results), Oct. 15 (third quarter results), Jan. 15 (fourth quarter results).**
  - **Fourth quarter deadlines are rapidly approaching: Carriers must complete a week of speed and latency testing by Dec. 31, 2026, and must submit and certify all test results by Jan. 15, 2027.**
- USAC encourages carriers to submit results as soon as testing is complete each quarter.
- Carriers upload results in the PMM using one CSV file for speed test results and one CSV file for latency test results.

Network Performance Testing: Missing Test Results

- Carriers that did not conduct all required testing during a quarter - and therefore do not have test data to submit and certify - for a particular SAC and speed tier combination must attest to this in the PMM within two weeks of the end of each quarter.
  - Carriers that did not conduct all required testing because they do not have locations yet in the HUBB or cannot find active subscribers to test for a particular SAC and speed tier combination may be subject to verification reviews that subscribers are not available.
  - Carriers that did not conduct all required testing for any other reason – including carriers that obtained a subscriber location sample but did not have time to set up testing - will see withholding of support during pre-testing and an impact on compliance calculations during official testing.
- Carriers should no longer notify the FCC and USAC by email that they did not conduct all required network testing for any reason, including a lack of active subscribers to test.
  - USAC and the FCC no longer accept no-subscriber or no-testing certifications by email.

Network Performance Testing: Late Filings

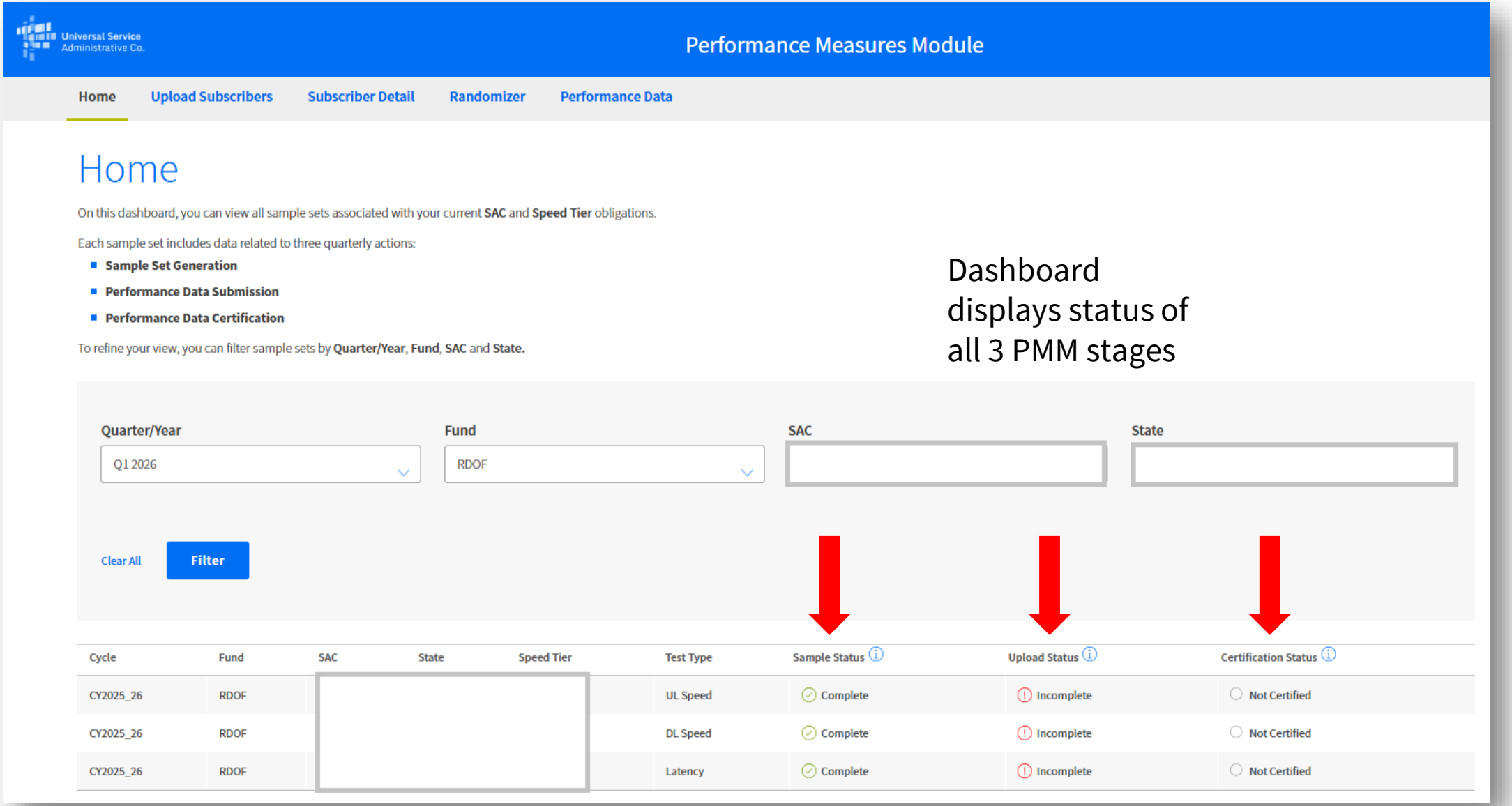
- Carriers that attempt to certify test data after a quarterly filing deadline must provide the PMM with a “late certification explanation” to submit their results.
    - Carriers that miss a quarterly filing deadline will see withholding of support until they certify required test results or attest to a lack of subscribers during pre-testing, and a reduction in support (support that will not be restored) that is assessed at the end of the fourth quarter of the year during official testing.
- Carriers that failed to conduct required testing during a past quarter or quarters for any reason - including because they had no locations reported yet in the HUBB or no subscribers to test - and failed to attest to this in the PMM (or notify the FCC and USAC by email) should complete the certification in the system as soon as possible to minimize the impact on support.

Performance Measures Module: New System Functionality

- To help carriers navigate the quarterly filing process:
  - A PMM home page dashboard provides a consolidated view of a carrier's status in generating subscriber location samples for testing, uploading test data and certifying test data (or attesting to no subscribers or no testing) for each required SAC and speed tier combination every quarter.
    - Dashboard lets carriers filter this information by quarter, fund, SAC and state to track their progress.
    - Dashboard helps carriers identify any missing samples, missing test data or missing certifications (or no-subscriber or no-testing certifications).
  - The PMM provides a quarterly data status breakdown for carriers to review to ensure they are submitting test data (or attesting to no subscribers or no testing) for all required SAC and speed tier combinations.
    - Carriers can then certify all test data and missing data certifications for an entire study area at once.

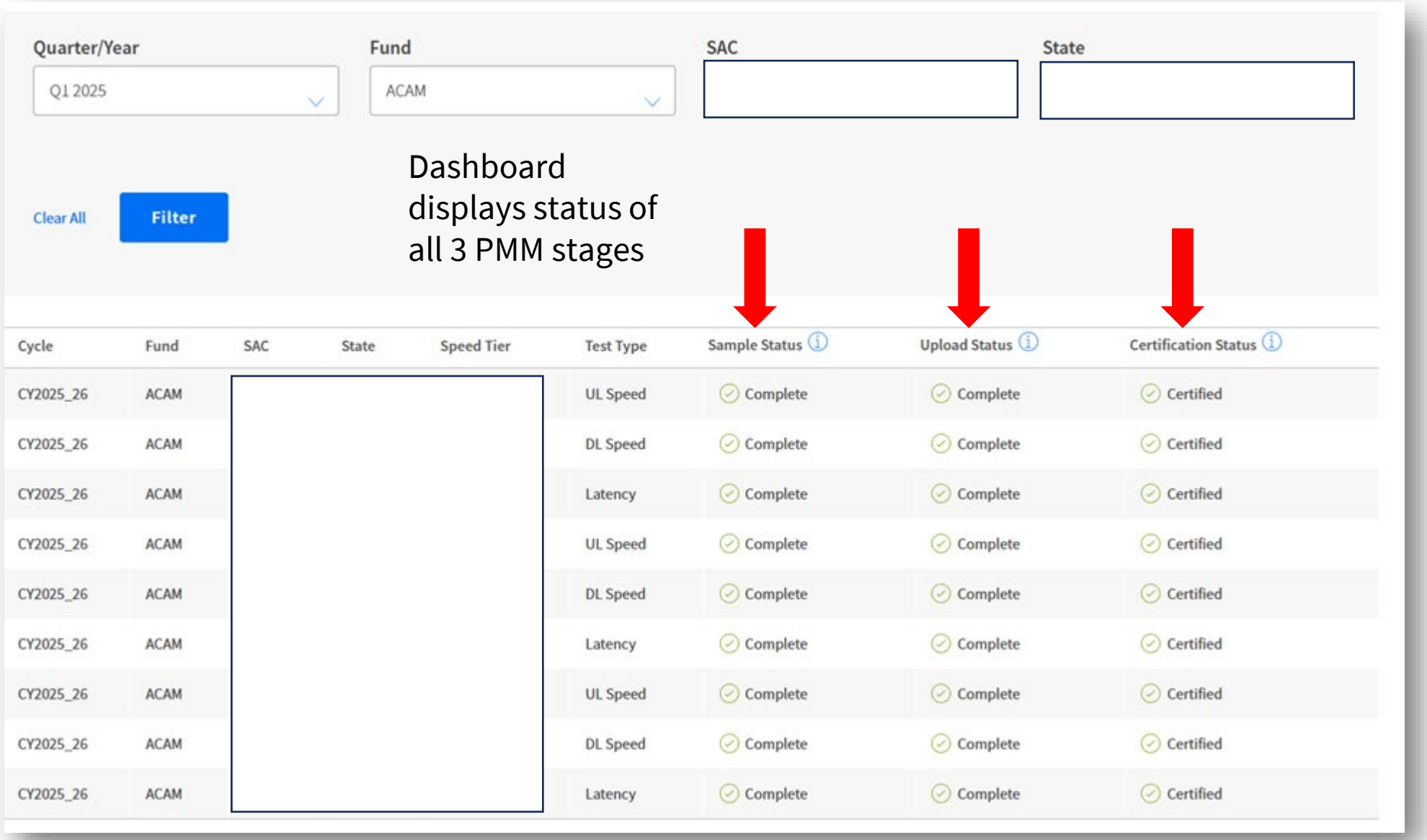
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Performance Measures Module – Dashboard



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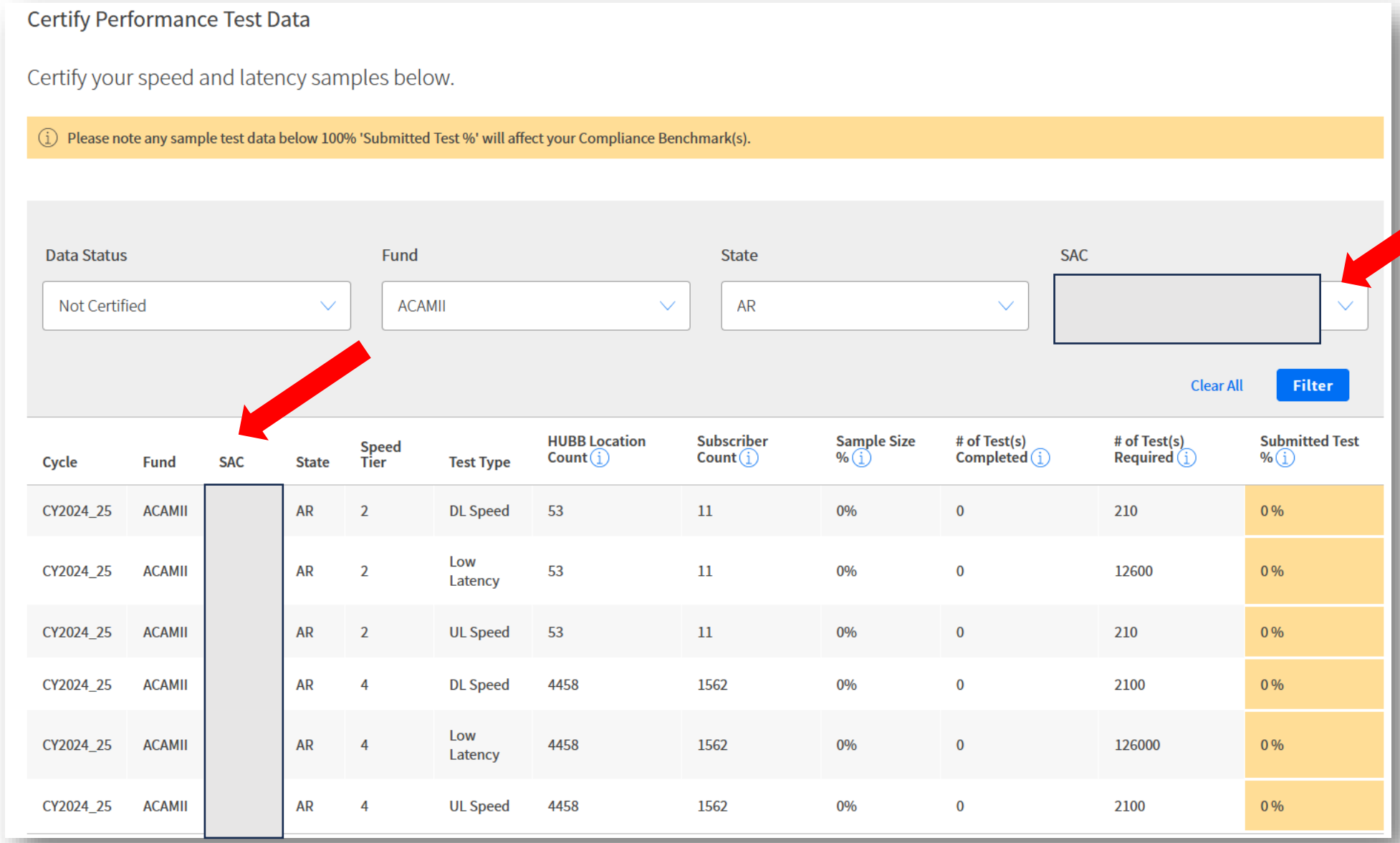
Performance Measures Module – Dashboard



Cycle	Fund	SAC	State	Speed Tier	Test Type	Sample Status	Upload Status	Certification Status
CY2025_26	ACAM				UL Speed	Complete	Complete	Certified
CY2025_26	ACAM				DL Speed	Complete	Complete	Certified
CY2025_26	ACAM				Latency	Complete	Complete	Certified
CY2025_26	ACAM				UL Speed	Complete	Complete	Certified
CY2025_26	ACAM				DL Speed	Complete	Complete	Certified
CY2025_26	ACAM				Latency	Complete	Complete	Certified
CY2025_26	ACAM				UL Speed	Complete	Complete	Certified
CY2025_26	ACAM				DL Speed	Complete	Complete	Certified
CY2025_26	ACAM				Latency	Complete	Complete	Certified

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Performance Measures Module

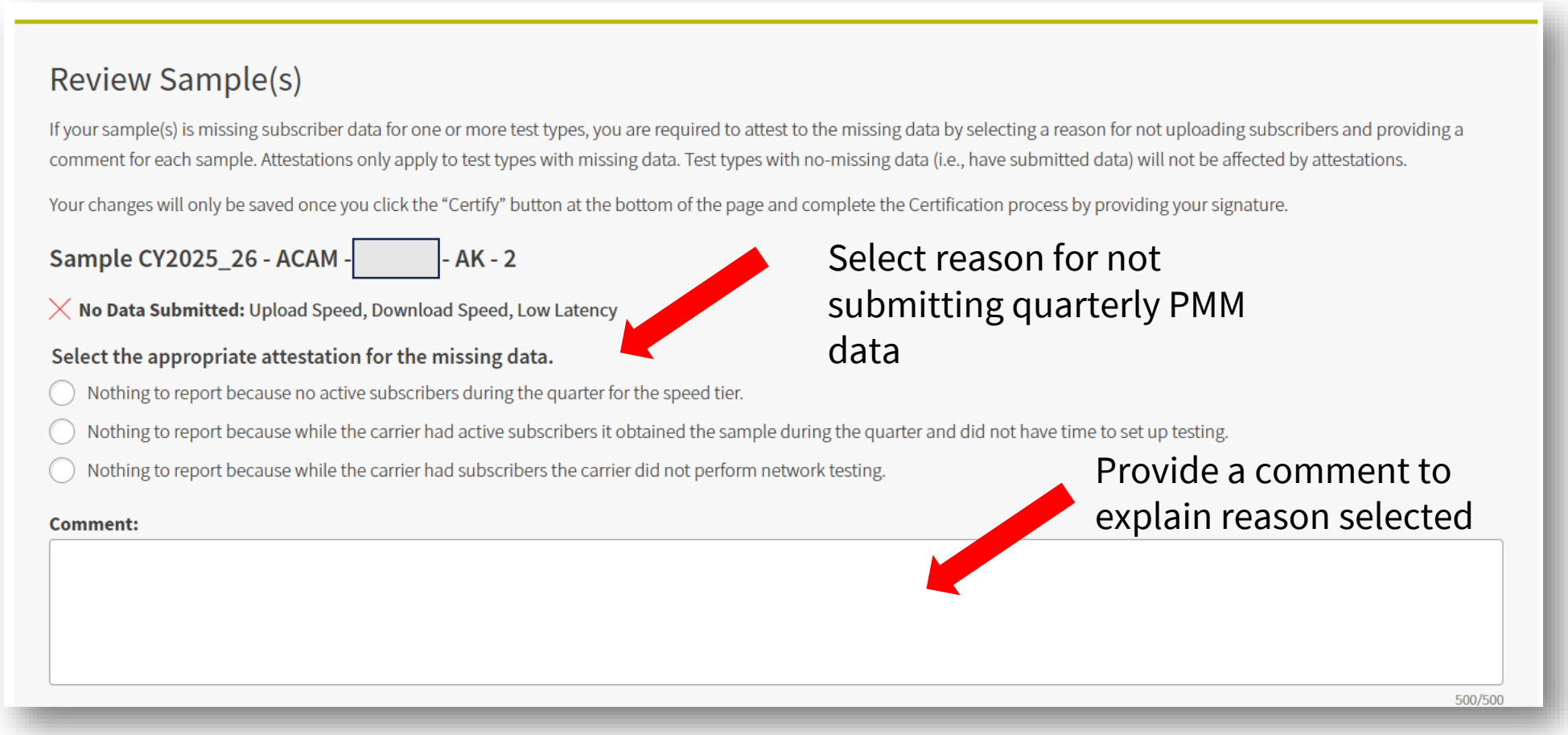


Cycle	Fund	SAC	State	Speed Tier	Test Type	HUBB Location Count	Subscriber Count	Sample Size %	# of Test(s) Completed	# of Test(s) Required	Submitted Test %
CY2024_25	ACAMII		AR	2	DL Speed	53	11	0%	0	210	0 %
CY2024_25	ACAMII		AR	2	Low Latency	53	11	0%	0	12600	0 %
CY2024_25	ACAMII		AR	2	UL Speed	53	11	0%	0	210	0 %
CY2024_25	ACAMII		AR	4	DL Speed	4458	1562	0%	0	2100	0 %
CY2024_25	ACAMII		AR	4	Low Latency	4458	1562	0%	0	126000	0 %
CY2024_25	ACAMII		AR	4	UL Speed	4458	1562	0%	0	2100	0 %

All samples for the SAC are displayed regardless of quarterly data submission.

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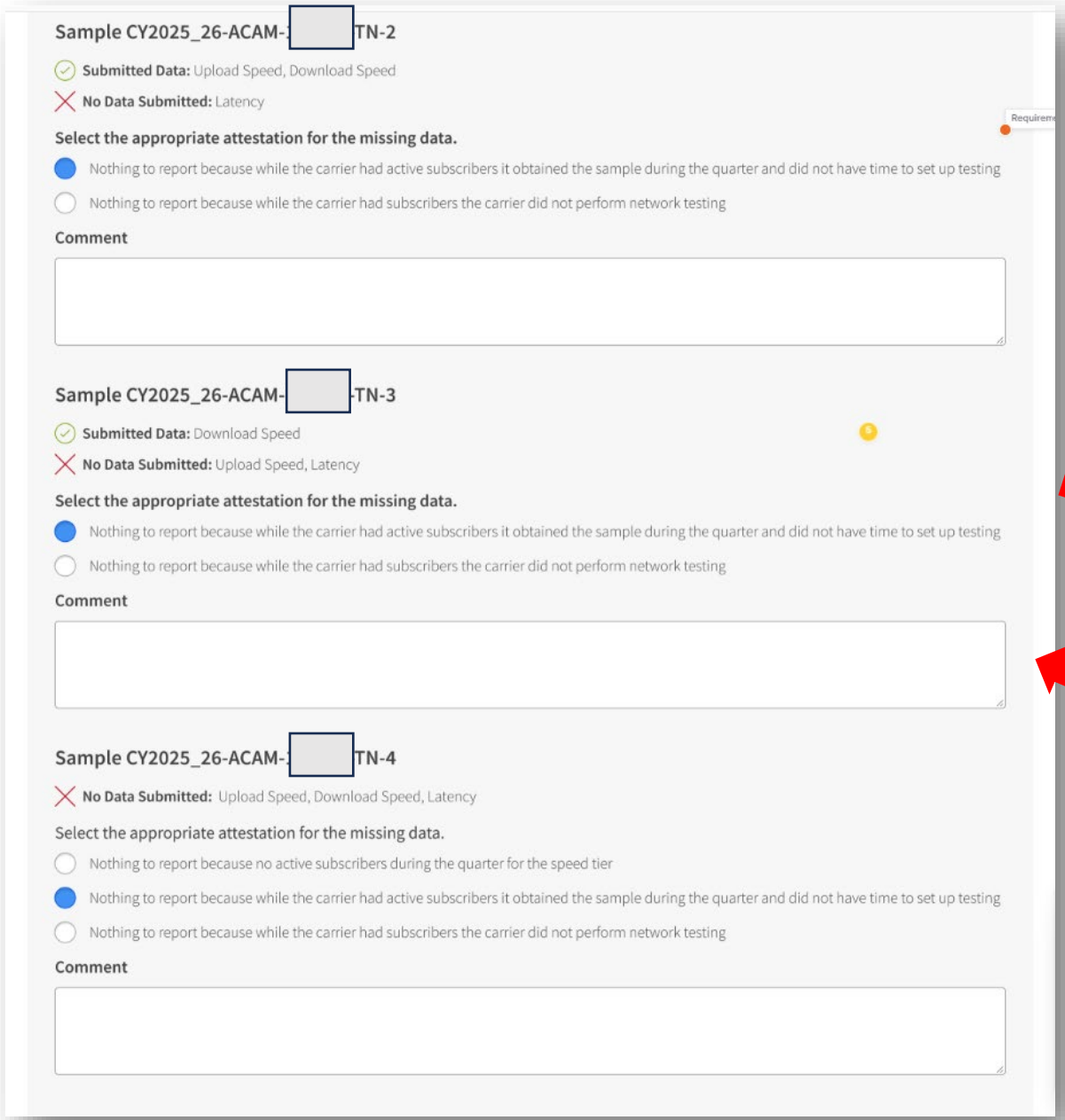
Performance Measures Module



- When Performance Data is not submitted for the quarter, you will see the following options to choose from as part of the new 'Attestation Certification'.
- Carriers must choose one of the options and provide a comment.

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Performance Measures Module



SAC with multiple speed tiers.

Select reason for not submitting quarterly PMM data

Provide a comment to explain reason selected

Network Performance Testing: Tracking Compliance

- USAC provides quarterly and annual compliance reports to help carriers track their progress in meeting FCC metrics, address shortfalls and submit missing data.
  - Compliance reports include details at SAC level about percent of speed and latency tests that met FCC standards.
  - FCC requires at least 80 percent of network speed measurements to be at 80 percent of required speeds and 95 percent of latency measurements to be at or below 100 milliseconds round-trip time.
- PMM calculates compliance separately for each SAC, speed tier and fund in which a carrier participates based on certified test results.
  - Results from speed and latency testing are subject to USAC verification and audit.
  - See PMM Compliance Calculations document on the USAC website for a detailed explanation of how the PMM calculates compliance.

Network Performance Testing: Tracking Compliance

- During pre-testing, carriers do not face withholding of support for failing to meet FCC metrics if they submit and certify required test results on time each quarter.
- During official testing, USAC does not withhold support from carriers that fail to meet FCC metrics for one or more quarters before evaluating certified data for the full year.
  - USAC calculates final annual compliance – and withholds support from carriers that fail to meet FCC metrics – only after carriers certify test data for all four quarters.
  - Any carrier found out of compliance based on annual testing results will have support restored once it achieves a full quarter of compliance with FCC metrics.
- If a carrier is out of compliance with FCC performance measures standards at the end of its build-out term and believes this is because its sample size is too small, it can request a larger random sample of subscriber locations that will produce test results with a margin of error of 5 percent or less and continue testing for an additional 12 months to demonstrate compliance. (See FCC 19-104, para. 75)

Network Performance Testing: Tracking Compliance

- Quarterly compliance reports for the first and second quarters of 2026 are available in the PMM
  - Carriers should check these compliance reports to confirm they submitted and certified all required test data – or completed all required no subscriber or no testing attestations – for both of the quarters by the filing deadlines, and to find out if their quarterly test results met FCC metrics.
    - Carriers that have not yet submitted all first and/or second quarter test data – or attested to no subscribers or no testing for both of the quarters - for the full sample of subscriber locations selected for testing for each SAC and obligated speed tier combination should submit any missing data or complete missing attestations ASAP to reduce impact on support payments.
    - Carriers in official testing that are at risk of being out of compliance because their speed and latency test results did not meet FCC standards can potentially get back into compliance by submitting passing quarterly results going forward.

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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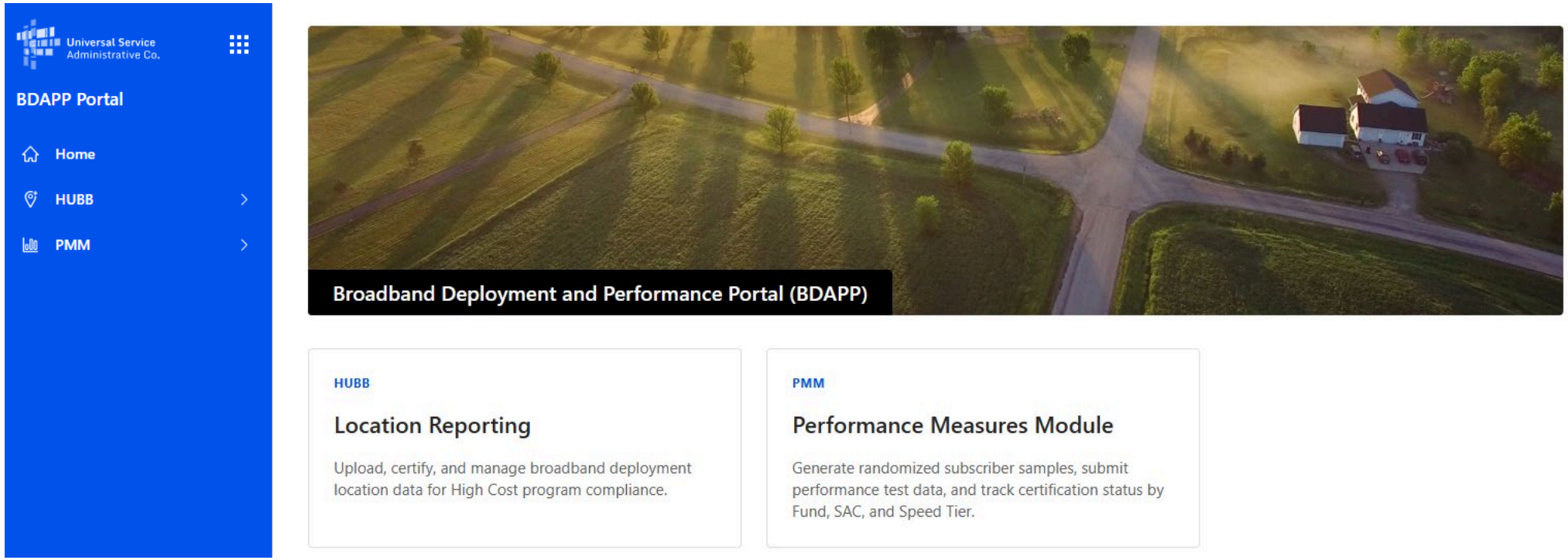


What’s Next – Upcoming Changes

Universal Service Administrative Co.

Modernization of HUBB and PMM

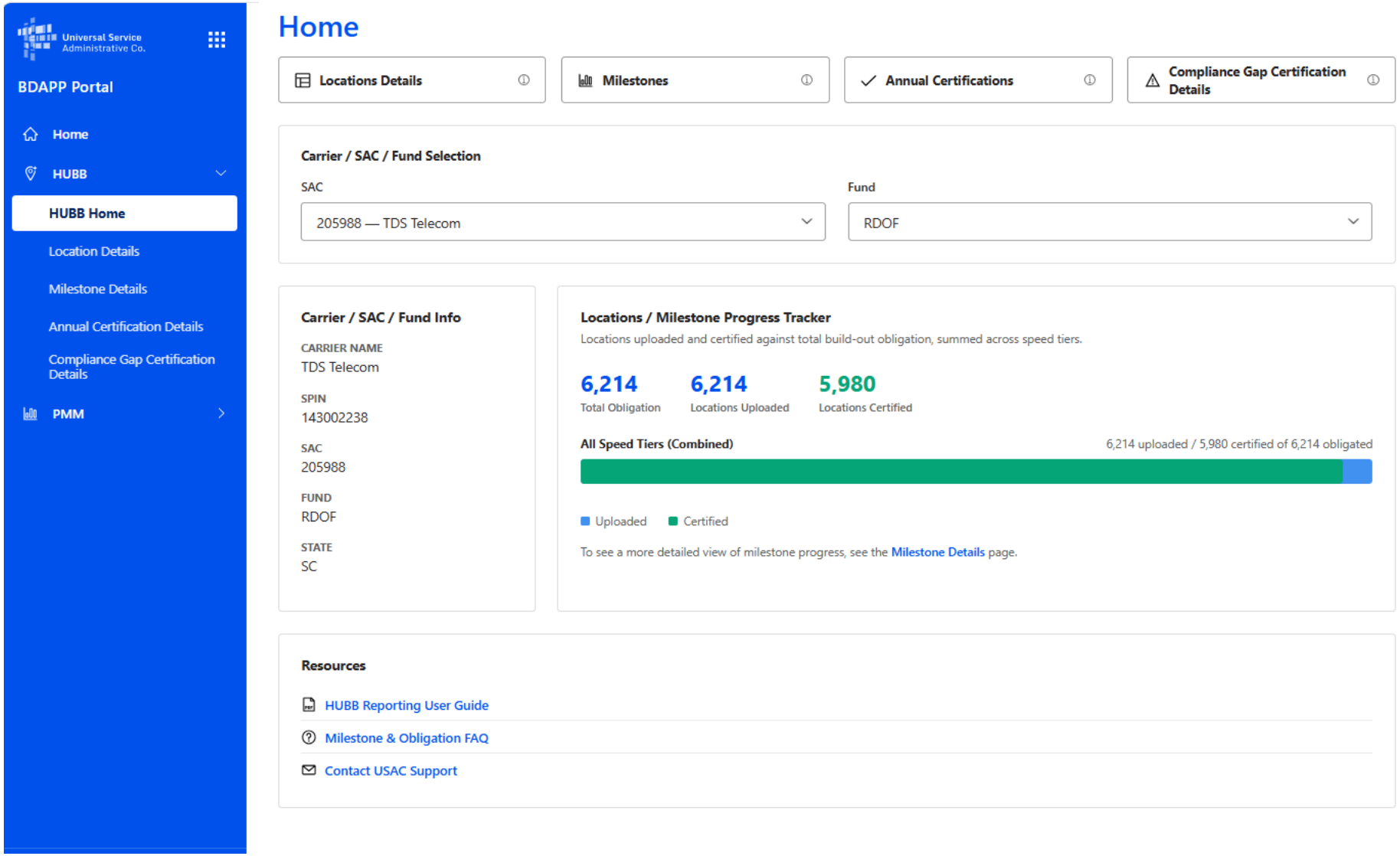
- USAC working to redesign HUBB and PMM into a unified system we call BDAPP (Broadband Deployment and Performance Portal)
- Utilizing current pain points, customer support issues and stakeholder feedback to identify areas for improvement
- Updating the systems to current technology
- Target release is Q2, 2027



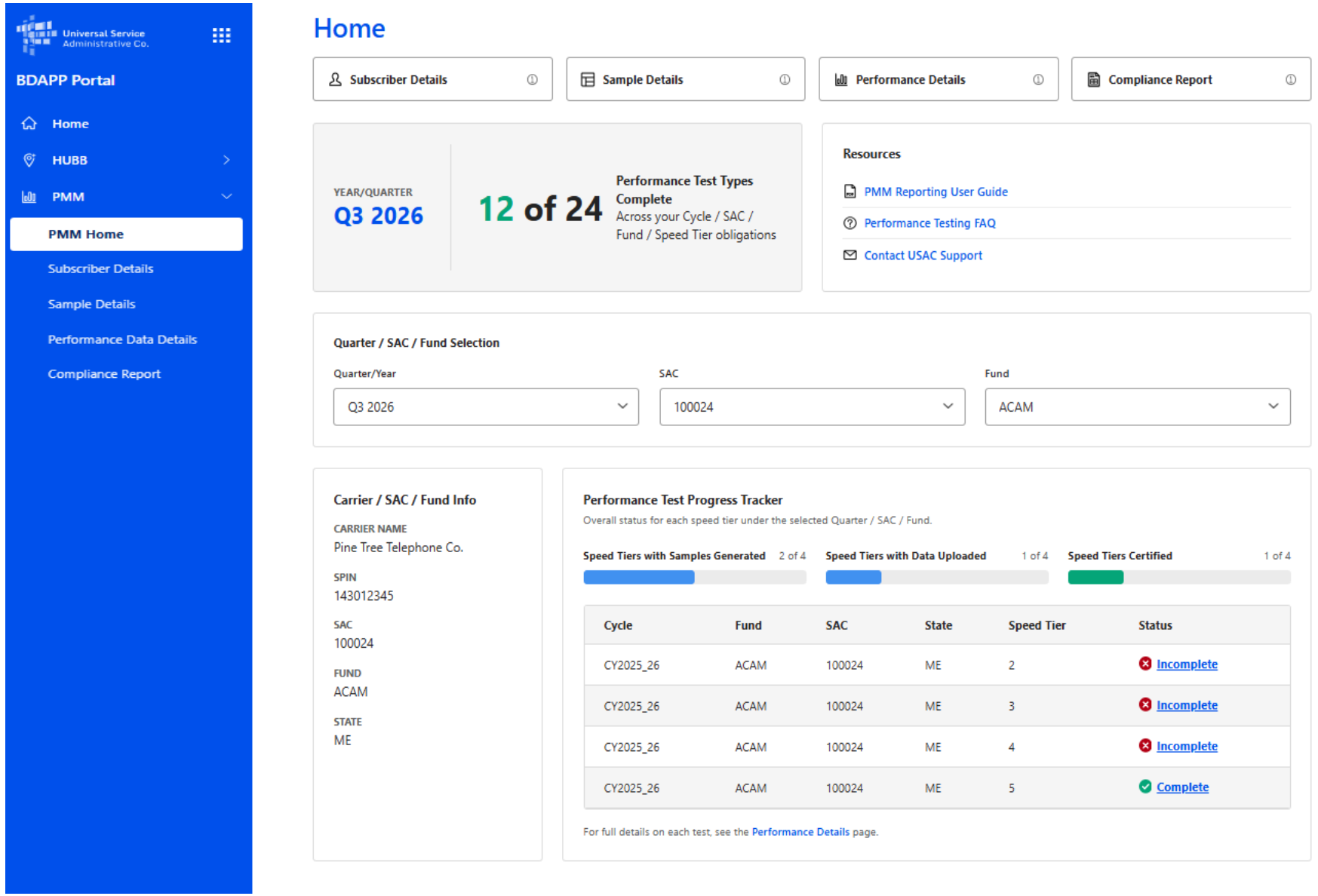
Modernization Goals

- Improve the carrier experience
  - Unified system streamlines the login process
  - Combined system allows creation of a unified dashboard
  - Simplified workflows to accomplish filing tasks
- System flexibility to handle exceptions and changes to program rules
  - Improved processing of SAC mergers, acquisitions and defaults
  - Improved PMM sample administration
- Improved reporting through data model redesign
  - Allows for more proactive data analysis
- Automated notifications for filing events

HUBB Home Page



PMM Home Page



Questions?

Thank You!



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