



March 28, 2019

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Re: USTelecom Ex Parte Notice, WC Dkt. No. 10-90, *Connect America Fund*

Dear Ms. Dortch:

On March 26, 2019, representatives of USTelecom, AT&T, CenturyLink, Consolidated, Frontier and Windstream (USTelecom Members) met with staff from the Wireline Bureau, and representatives from the Universal Service Administrative Company (USAC); the full list of participants is below. The purpose of the meeting was to discuss USTelecom's proposals for administrative changes in the reporting process associated with the Connect America Fund (CAF) II model-based support program. Specifically, USTelecom had proposed a system for batch-updating USAC's High Cost Universal Broadband (HUBB) portal.¹ Among other things, USTelecom members report a substantial degree of geocoordinate variability based upon which mapping vendor the carrier uses, which is the cause of many of the edits that a CAF participant will submit as it endeavors to provide more accurate information regarding its program compliance. The USTelecom proposal included means of modifying, deleting, and submitting new locations into the HUBB, and this meeting focused on defining and clarifying the processes for making a "modification" to a previously filed CAF-enabled location and for the "deletion" of such a location.

Wireline Bureau staff explained that there would be limits on modifications to latitude and longitude coordinates, with greater changes requiring that the currently-filed location be deleted in the HUBB. Participants discussed whether a correction to the fourth, fifth or sixth tenth of a geocoordinate decimal (with the fourth digit representing an accuracy level of approximately 36 feet) would be an appropriate demarcation point for what was acceptable as a modification. USAC requires CAF participants to submit geocoded coordinates for served locations with an accuracy level of six decimal points (each decimal "tenth" represents an increasing level of accuracy); the sixth decimal point equates to an accuracy level of approximately four inches. It is important to recognize, however, that each geocoordinate is fundamentally a number, and therefore each tenth of the decimal point is interrelated to the preceding tenth and can change accordingly. For example, if the six decimal points associated

¹ Letter from Mike Saperstein, VP Law & Policy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Mar. 6, 2019).

with a geocoordinate were .679999, a modification of only four inches in the real world (to the sixth digit of the decimal) would change the resulting geocoordinate to .680000, affecting the first five numbers following the decimal point. While a change to the second tenth could represent an adjustment of over 3600 feet, in this example it only changed due to its interrelation with the other digits with an adjustment of just four inches. In other words, a change in a geocode digit does not necessarily correlate to the scale of the geographic adjustment or the degree of accuracy provided.

Based on USTelecom member's experience with geocoding well over a million locations for HUBB submissions, we believe any change that does not affect both the address *and* the geocoordinates provided for that address should be deemed a "modification." In this system, either the geocode or the address will serve as the "check digit" to provide assurance that the location itself remains valid. There will be only one geocoordinate associated with an address and any modification, regardless of how it affects the digits of a geocoordinate, will still be tied to that address so the Commission and USAC can verify that the location counts remain the same from year to year. If, however, the Commission needs to establish a definition for "modifications" based upon the digits of a decimal point, USTelecom strongly recommends that a change to the third through sixth decimal point should be included as a "modification." After all, the third digit represents a latitude/longitude accuracy of only approximately 360 feet which in rural areas is often less than the distance between a mailbox at the road to the house at the end of the driveway.

Participants also discussed whether to provide reason codes for deleting locations, recognizing that many real-world events may sometimes require deleting a location and submitting a new in its place. In particular, the participants agreed that coding a location as deleted because of "mapping" (because of a substantial change to the geocoordinate accuracy); and "error" this would apply to an entire location submitted in error, not an error in the data record, were sensible flags for deletions. The participants discussed the use of the term "destroyed," but USTelecom believes this may require a subjective level of judgment by the carrier as to the condition of a building; "unavailable" or "unserviceable" would better meet the spirit of defining a location that was once broadband serviceable and in a CAF II eligible area but is no longer serviceable due to physical or other changes to the location.

USTelecom also recommends the addition of a "network/provisioning change" reason code, which could be used when changes to a service provider's network or new information about the network renders a reported serviceable location no longer servable under the terms of the CAF program.² CAF participants would be responsible for flagging any deletions to the HUBB with one of these codes.

² For example, when a fixed wireless provider, which submits HUBB data based on propagation mapping, determines upon attempting to install the service at a location that the presence of trees or other previously unknown topographic features reduces signal strength such that 10/1 service cannot be reliably delivered.

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Finally, USTelecom affirmed its support for Cincinnati Bell's request for waiver to accept CAF II locations deployed in a year prior to the year in which it was reported.³ USTelecom looks forward to further discussions with staff regarding whether a waiver is the most appropriate vehicle in these situations.

Please contact me with any questions.

Sincerely,

_____/s/_____
Mike Saperstein
Vice President, Law & Policy

cc: Meeting Participants

Meeting Participants

FCC: Alexander Minard, Nissa Laughner, and Gilbert Smith

USAC: Amanda Bilodeau, Sammy Khan, Joelle Tessler, Tim Weith, and Sherika Wynter attended in person.

AT&T: Mary Henze and Brendan Haggerty attended in person with Ann Bornholdt via phone

CenturyLink: Jeff Lanning in person with Ken Buchan, Nick Alexander, and Richard Rousselot via phone

Consolidated: Barbara Galardo via phone

Frontier: AJ Burton

USTelecom: Mike Saperstein

Windstream: Thomas Whitehead via phone

³ Cincinnati Bell Telephone Company LLC Petition for Waiver or Clarification of Section 54.316 of the Commission's Rules, WC Docket No. 10-90 (filed Feb. 25, 2019).