**3060-0986** July 2015

#### SUPPORTING STATEMENT

This information collection 3060-0986 is being submitted to obtain OMB approval for revised information collection requirements as a result of incorporating existing information collection requirements from 3060-1188 (FCC Form 505) into this information collection.

### A. Justification:

1. Circumstances that make the collection necessary. The requirements in this information collection are used to determine the amount of, and eligibility for, high-cost universal service support received by incumbent and competitive eligible telecommunications carriers (ETCs) under the Connect America Fund.

The Communications Act of 1934, as amended (the Act) requires the "preservation and advancement of universal service." The information collection requirements reported under this control number are the result of various Commission actions to promote the Act's universal service goals, while minimizing waste, fraud, and abuse.

On November 18, 2011, the Commission adopted an order reforming its high-cost universal service support mechanisms. Connect America Fund; A National Broadband Plan for Our Future; Establish Just and Reasonable Rates for Local Exchange Carriers; High-Cost *Universal Service Support; Developing a Unified Intercarrier Compensation Regime;* Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208, Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (USF/ICC Transformation Order), and the Commission and Wireline Competition Bureau have since adopted a number of orders that implement the USF/ICC Transformation Order; see also Connect America Fund et al., WC Docket No. 10-90 et al., Third Order on Reconsideration, 27 FCC Rcd 5622 (2012); Connect America Fund et al., WC Docket No. 10-90 et al., Order, 27 FCC Rcd 605 (Wireline Comp. Bur. 2012); Connect America Fund et al., WC Docket No. 10-90 et al., Fifth Order on Reconsideration, 27 FCC Rcd 14549 (2012); Connect America Fund et al., WC Docket No. 10-90 et al., Order, 28 FCC Rcd 2051 (Wireline Comp. Bur. 2013); Connect America Fund et al., WC Docket No. 10-90 et al., Order, 28 FCC Rcd 7227 (Wireline Comp. Bur. 2013). The Commission has received OMB approval for most of the information collections required by these orders. At a later date the Commission plans to submit additional revisions for OMB review to address other reforms adopted in the orders (e.g., 47 C.F.R. 54.313(a) (11)).

Justification for Requirements Being Incorporated From Control Number 3060-1188:

As part of the *USF/ICC Transformation Order*, the Commission adopted several subsequent Orders for implementing Connect American Phase I and Phase II funding:

On May 16, 2013, the Commission adopted a second *Connect America Fund*, Report and Order, WC Docket No. 10-90, DA 13-1113. The Report and Order set forth the format and substance of the submissions carriers must make to elect Phase II funding through the state-level commitment process. Additionally, this Report and Order established the parameters for the Connect America Phase II challenge process. These parameters included requirements for what parties must submit to the Commission when making a challenge, as well as the form that parties must use in making any challenges.

On May 21, 2013, the Commission adopted a third *Connect America Fund*, Report and Order, WC Docket No. 10-90, FCC 13-73. This Report and Order provided for a second round of Connect America Phase I support and specified what certifications and reporting requirements carriers must comply with if electing to accept second round support.

These Orders contained information collection requirements for which the Commission received OMB approval for three years on May 30, 2014.

Then on July 15, 2013, the Commission adopted the *Connect America Fund*, Order on Reconsideration, WC Docket No. 10-90, FCC 13-97, which modified a reporting requirement contained in the May 21, 2013 Report and Order. The Order on Reconsideration made mandatory the reporting of changes in deployment locations involving census blocks that were not previously identified. This reporting requirement had previously been optional under the original Report and Order.

Information collection 3060-1188 and the associated FCC Form 505 address these requirements to carry out the programs set forth in the *USF/ICC Transformation Order*. There are no changes to the requirements currently approved under collection 3060-1188. In merging the requirements contained in 3050-1188 into 3060-0986, we also propose to revise FCC Form 481 to reflect certain information collections already approved under 3060-1188. Specifically, the proposed new Lines 2022, 2023, and 2024 for FCC Form 481 will add certifications and a place to attach related data for certain recipients of Connect America Fund Phase I support (see #6 below). In the instructions to FCC Form 481, new language will provide directions for respondents related to these certifications and the data submission (Section IV, new lines 2022- 2024).

Justification for Reduction in Burden for Phase I Incremental Support Requirements

Both information collection 3060-1188 and information collection 3060-0986 include requirements for recipients of Phase I incremental support. Eight price cap carriers have elected to receive incremental support over two rounds of the offer of such support. Accordingly, the Commission proposes to reduce the number of respondents for the Phase I incremental support reporting and certification requirements to reflect the number of price

cap carriers that have actually accepted Phase I incremental support. This will involve reducing the burden for numbers 1, 2, 3, 4, 6, and 29 below.

# Incorporation of Currently Approved Information Collection Requirements From OMB Control Number 3060-1188 (1-7 below):

(1) <u>Geocoded Information for Phase I Two- and Three-Year Milestone Reports</u>

Carriers under Connect America Phase I are required to deploy to a set number of locations to satisfy the obligation attached to any funding they elect to receive. Two and three years after accepting funding, recipients of Connect America Phase I funding are required to file reports on their progress toward meeting their obligations. 47 C.F.R. § 54.313(b). The Commission recently required that these reports include the geocoded information for each location to which a carrier deploys in meeting its Phase I obligations. Geocoded locations are necessary for the Commission to verify that carriers have in fact deployed to the number of locations claimed. *Connect America Fund*, WC Docket 10-90, Report and Order, FCC 13-73 (May 22, 2013).

For each location to be counted toward satisfaction of the carrier's deployment obligation, the recipient must report the following information in its two- and three-year milestone reports:

- (a) The location's census block information is based on the Federal Information Processing Standard (FIPS) code,
- (b) The carrier's NECA-assigned operating company code (OCN),
- (c) The carrier's study area code (SAC),
- (d) The wire center's eight-digit Common Language Location Identified (CLLI) code,
- (e) The latitude (to six decimal places), and
- (f) The longitude (to six decimal places).

If two locations have identical latitude and longitude coordinates (*e.g.*, two apartments that are vertically aligned), recipients should note these situations and provide an explanation for the duplication.

We propose to revise Form 481 to incorporate this requirement (see screenshot attached). We also propose to reduce the burdens associated with this requirement to reflect that eight price cap carriers accepted Phase I incremental support.

(2) <u>Broadband Initiatives Program/Broadband Technology Opportunities Program Annual Milestone Reports</u>

Phase I funding recipients are prohibited from satisfying their deployment obligations by deploying to locations that are already or will be served by the Broadband Initiatives Program (BIP) or the Broadband Technology Opportunities Program (BTOP). This requirement promotes efficient use of government funds by ensuring that two government programs do not pay for broadband to be deployed to the same location. To ensure that carriers abide by the restriction on building to BIP and BTOP locations, the Commission requires carriers to certify in annual milestone reports that, to the best of the recipient's knowledge, the locations in question are not receiving support under BIP or BTOP for projects that will provide broadband with speeds of at least 4 Mbps downstream and 1 Mbps upstream. 47 C.F.R. § 54.313(b)(2)(i).

We propose to revise Form 481 to incorporate this requirement (see screenshot attached). We also propose to reduce the burdens associated with this requirement to reflect that eight price cap carriers accepted Phase I incremental support.

### (3) Phase I Investment Annual Milestone Reports

Connect America Phase I involves the investment of hundreds of millions of dollars of government funding. It is necessary for carriers to report on where those funds are being used to ensure proper oversight. To that end, Phase I funding recipients are required to report annually the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks where funding was spent. 47 C.F.R. § 54.313(b)(2)(ii). This information will allow the Commission to track where funding is spent and ensure that funds are used for proper purposes.

We propose to revise Form 481 to incorporate this requirement (see screenshot attached).

### (4) Changes in Phase I Deployments

Connect America Phase I recipients are permitted to deviate from their initially reported deployment plans. However, in doing so, they are required to report the change to the Commission by submitting a letter in WC Docket No. 10-90, the Universal Service Administrative Company (USAC or Administrator), relevant state commissions, and any affected Tribal government. 47 C.F.R. § 54.312(b)(3).

- (a) Changes that involve a decision not to deploy to a previously identified census block must be reported prior to filing the final deployment certification under 47 C.F.R. § 54.313(b)(2).
- (b) Changes that involve deploying to census blocks that were not identified previously must be reported at least 90 days prior to deployment. The Commission will publicly announce these changes.
- (c) No sooner than 46 days after this public announcement, but prior to commencing construction, if the carrier is deploying to census blocks not identified previously, the

carrier must make all certifications that would have been required had the carrier elected to deploy to that census block when it initially accepted support. *Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, FCC 13-97 (July 16, 2013).

The requirement to report updated Phase I deployment plans serves two purposes:

First, it allows the Commission to verify that the locations in question are eligible for Phase I support prior to deployment.

Second, it gives existing broadband providers an opportunity to inform the Phase I recipient that the providers are already serving the census blocks in question. Thus, this reporting requirement ensures that Connect America Phase I funds are spent only in eligible areas, helping to guarantee that government funds are used effectively to bring broadband to as many eligible unserved locations as possible.

We propose to reduce the burdens associated with this requirement to reflect that eight price cap carriers accepted Phase I incremental support.

### (5) <u>Connect America Phase II State-Level Commitment Elections</u>

Incumbent price cap carriers are given an opportunity to accept Phase II support for all areas they serve in a given state, in exchange for making a commitment to provide a certain level of service to those areas. A carrier may accept or decline support through its Phase II election:

- (a) If a carrier is accepting funding, it must submit a letter signed by an officer of the company declaring that the carrier accepts the support amount and commits to satisfy the service obligations for Phase II. The carrier must also acknowledge that if it fails to meet its service obligations, it will be subject to penalties and/or enforcement actions, as specified by the Commission. If the Commission ultimately decides to require a letter of credit or other form of security for Phase II elections, such security must be submitted along with the election letter.
- (b) A carrier may decline Phase II support by submitting a letter signed by an officer of the company noting that it does not accept Phase II support for a given state. *Connect America Fund*, WC Docket No. 10-90, Report and Order, DA 13-1113 (Wireline Comp. Bur. May 16, 2013).

The submission of an election letter is necessary for the Commission to determine what Phase II support should be distributed. Requiring the acknowledgement of service obligations will ensure that carriers have affirmative knowledge of what burdens they take on as a result of electing to accept Phase II support.

## (6) <u>Connect America Fund Phase I Certifications</u>

Phase I of the Connect America Fund provides a substantial amount of support to price cap carriers in exchange for a commitment to deploy broadband-capable infrastructure to areas currently lacking broadband. To prevent waste, fraud, and abuse in the program, carriers are required to certify in various ways that the funds they received are spent only in areas eligible for funding. In the Commission's recent Report and Order implementing a second round of Phase I support, carriers are required to make several certifications related to their public interest obligations. *Connect America Fund*, WC Docket 10-90, Report and Order, FCC 13-73 (May 22, 2013).

The following certifications apply only to Phase I funds accepted in 2013 or later. They do not apply to Phase I funding accepted in 2012. Renewal of these certifications is necessary in the event that recipients make changes to their Connect America Phase I deployment plans. If a recipient intends to deploy to a location that it had not identified previously, it is required to make all the Phase I certifications. Under the current schedule for Phase I, recipients could make changes to deployment plans as late as 2016.

All Phase I recipients must certify in a letter filed in WC Docket No. 10-90:

- 1) that the locations to be served are not shown as already served by either 768 kbps /200 kbps Internet service or 3 Mbps/768 kbps Internet service;
- 2) that to the best of the carrier's knowledge, the locations are in fact unserved by 768 kbps /200 kbps Internet service or 3 Mbps/768 kbps Internet service, as appropriate;
- 3) the carrier's current capital improvement plan did not already include plans to complete broadband deployment within the next three years to the locations to be counted to satisfy the deployment obligation;
- 4) incremental support will not be used to satisfy any merger commitment or similar regulatory obligation; and
- 5) the carrier has undertaken due diligence to determine the locations in question are not within the service area of either BIP or BTOP projects that will provide Internet access with speeds of at least 3 Mbps downstream and 768 upstream.

Any Phase I recipient that wishes to satisfy its Phase I deployment obligations by building in census blocks that are or will receive funding through BIP or BTOP must certify to the Commission that the particular locations its plans to serve will not receive funding under BIP or BTOP.

Any Phase I recipient that wishes to satisfy its Phase I deployment obligations by building to locations in its own service territory shown on the National Broadband Map as served by 3 Mbps/768 kbps must specify those particular locations and certify to the Commission that those locations are currently served from a copper-fed digital subscriber line access multiplexer (DSLAM) and the carrier is the only entity offering 3 Mbps/768 kbps or better service to that location.

Any Phase I recipient that wishes to satisfy its Phase I deployment obligations by building to locations shown as served by 768 kbps/200 kbps Internet service but unserved by 3 Mbps/768 kbps Internet service must certify that it has accepted funding for all projects or routes to locations unserved by 768 kbps/200 kbps Internet service that can be economically reached using \$775 in Connect America funding plus an equal amount of non-Connect America carrier capital expenditure funding.

To the extent a carrier has multiple routes for which it would be economic to extend service with a one-for-one match of Connect America funding, it must certify that it has prioritized routes so as to maximize the number of newly served locations that currently are unserved by 768 kbps/200 kbps Internet service. Such carriers must also identify the number of locations to which they intend to build that are unserved by 768 kbps/200 kbps and the number of locations to which they intend to build that are served by 768 kbps/200 kbps but unserved by 3 Mbps/768 kbps. Carriers must also submit a list of census blocks unserved by 3 Mbps/768 kbps or 768 kbps/200 kbps, as appropriate, where they intend to deploy to meet their build-out obligation.

We propose to reduce the burdens associated with this requirement to reflect that eight price cap carriers accepted Phase I incremental support.

## (7) Connect America Fund Phase II Challenge Process

The Wireline Competition Bureau of the Commission set forth a challenge process by which carriers could contest the status of census blocks as shown on the National Broadband Map. *Connect America Fund*, WC Docket No. 10-90, Order, DA 13-1113, at paras. 4-22 (Wireline Comp. Bur. May 16, 2013).

All parties wishing to raise a challenge or respond to a challenge must file their challenge with the Bureau using FCC Form 505. Parties must submit their name, FCC Registration number (if applicable), the name, mailing address, e-mail address, and phone number of the person filling out the challenge form. Parties must also submit a certification that all information in the form is correct to the best of their knowledge, and include the name, e-mail address, and phone number of the person making that certification.

Parties challenging that a census block shown as served is in fact unserved must submit the Federal Information Processing Standard (FIPS) code for the block, the state the block is located in, the name of any provider shown as providing disqualifying service to that block, an indication of what criteria of service the challenger believes is not being met, an indication of what type of evidence supports the challenge, and any additional comments believed to be necessary. Parties must also certify that they engaged in due diligence to verify their claims and submit as attachments any evidence supporting the challenge.

Parties challenging that a census block that is shown as unserved is in fact served must submit the FIPS code for the block, the state the block is located in, the name of the entity that provides service, the FCC Registration Number of the party filing the challenge (if the party filing the challenge is also the entity providing service), a certification that the census block is served by unsubsidized broadband and voice services meeting the Commission's performance and pricing criteria, an indication of what type of evidence supports the challenge, and any additional comments believed to be necessary. Parties must also submit as attachments any evidence supporting the challenge.

Parties making a challenge also are required to serve a copy of their challenge on the challenged party, or certify that such service was completed or that a good faith effort was made to provide such service.

Parties responding to a challenge must submit the FIPS code for the block, the state the block is located in, the name of the entity that made the initial challenge and its FCC Registration Number (if provided), an indication as to what performance or pricing criteria is at issue, an indication of what type of evidence supports the challenge, and any additional comments believed to be necessary. Parties must also submit as attachments any evidence supporting the response.

*Information Collection Requirements Currently Approved Under 3060-0986* (8 – 32 below):

### **Rate-of-Return Carrier Requirements**

(8) 47 C.F.R §§ 54.902(c)(1), 54.903(a)(1), and 54.903(a)(3) (projected revenue requirements). In order to enable the Administrator to calculate per-line amounts of ICLS, rate-of-return carriers other than average schedule companies shall report to the Administrator their projected common line revenue requirement for each study area in which they operate.

Consistent with their average schedule status, average schedule companies are required to submit information necessary in order for the Administrator to calculate common line revenue requirements for average schedule companies.

In accordance with 47 C.F.R. § 54.705, the Administrator has the authority to perform audits of beneficiaries of the ICLS mechanism to ensure the accuracy of data submitted.

In addition to the projected cost data (i.e., projected common line revenue requirement), rate-of-return carriers (other than average schedule companies), must file with the Administrator projected revenue data, including demand data, on the same schedule. These data are necessary to calculate the amount of ICLS that a rate-of-return carrier will receive pursuant to 47 C.F.R. § 54.901, pending the availability of actual cost and revenue data (described below).

Projected cost data, including cost and revenue data is filed on FCC Form 508.

A carrier must also certify that the projected data are accurate to the best of the carrier's

knowledge and ability. If a carrier elects to have an agent perform the filing on its behalf, the carrier must authorize the agent to make the filing and certify that it has provided accurate data to the agent for the purpose of performing the filing. The agent must then also certify that the projected data are accurate to the best of its knowledge and ability. Carriers must file the data by March 31 for the following July 1 to June 30 funding year. Carriers can correct data filed on March 31 until June 30.

(9) 47 C.F.R. §§ 54.902(a)(1), 54.902(b)(1), 54.902(b)(3) and 54.903(a)(4) (true ups). A rate-of-return carrier's final ICLS is based on its actual costs and revenues and therefore any prospective ICLS provided pursuant to projected cost and revenue data must be "trued up" with the final ICLS amount. True ups also enable carriers that require additional ICLS due to unforeseen costs or unexpectedly low revenues to file actual cost data and receive increased ICLS based on those costs. Additionally, true ups serve to minimize incentives for carriers to overstate projected interstate common line revenue requirements. Through the true up process, such carriers eventually receive support that reflects their actual costs.

December of each year, rate-of-return carriers, as required, submit actual interstate common line cost data to the Administrator for the preceding calendar year. To the extent that actual cost and revenue data results in a different ICLS amount than the prospective ICLS provided pursuant to projected cost and revenue data, the Administrator adjusts a rate-of-return carrier's monthly per-line ICLS in the following calendar year.

In addition to the interstate common line cost data, rate-of-return carriers must file with the Administrator interstate common line revenue data, including demand data, on the same schedule. This data is necessary to calculate the amount of ICLS that a rate-of-return carrier will receive pursuant to 47 C.F.R. § 54.901.

The actual data, including cost and revenue data is reported on FCC Form 509.

A carrier must also certify that the actual data are accurate to the best of the carrier's knowledge and ability. If a carrier elects to have an agent for the carrier perform the filing on its behalf, the carrier must authorize the agent to make the filing and certify that it has provided accurate data to the agent for the purpose of performing the filing. The agent must then also certify that the actual data is accurate to the best of its knowledge and ability. Additionally, some carriers (approximately 60 to 120 carriers) will be selected to provide additional information to validate the data provided on FCC Form 509, pursuant to the Administrator's obligation to prevent waste, fraud, and abuse of universal service funds.

(10) 47 C.F.R. § 54.903(a)(1), and 54.903(a)(2) (line counts). Rate-of-return carriers must file their line counts, by disaggregation zone and customer class, in accordance with the schedule in 47 C.F.R. §§ 36.611 and 36.612.

In order for the Administrator to calculate appropriate levels of support, line counts must be assigned to disaggregation zones if disaggregation zones have been established within a study area. In addition, the line count information must show residential/single-line business line counts separately from multi-line business line counts.

The residential/single-line business lines reported may include single and non-primary residential lines, single-line business lines, basic rate interface (BRI) integrated services digital network (ISDN) service, and other related residence class lines.

Similarly, the multi-line business class lines reported may include multi-line business, Centrex, ISDN primary rate interface (PRI) and other related business class lines.

Such reporting requirements are necessary to enable the Administrator to calculate appropriate levels of ICLS for rate-of-return carriers.

Line count data is reported on FCC Form 507.

A carrier must also certify that the line count data are accurate to the best of the carrier's knowledge and ability. If a carrier elects to have an agent for the carrier perform the filing on its behalf, the carrier must authorize the agent to make the filing and certify that it has provided accurate data to the agent for the purpose of performing the filing. The agent must then also certify that the line count data is accurate to the best of its knowledge and ability.

### Form 481 Requirements

Through the Connect America Fund, the Commission provides substantial amounts of funding to private entities in order to deploy advanced voice and broadband networks throughout the country. To ensure these funds are properly used, various reporting requirements are imposed on funding recipients. The reports, information, and certifications discussed in this section must be submitted annually to the Commission, the Administrator, and the relevant state, Tribal, or territorial authorities.

Any recipient of high-cost support must report the following:

47 C.F.R. § 54.313(a)(1). To accomplish its mission of deploying advanced (11)networks throughout the nation, the Commission must know how support is being spent to improve the telecommunications infrastructure. Any carrier receiving high-cost support that has broadband obligations must file a five-year service quality improvement plan, and must file annually thereafter a progress report on its plan. The five-year plan must describe with specificity proposed improvements or upgrades to the carrier's network throughout its proposed service area. The carrier must estimate the area and population that will be served as a result of the improvements. The information shall be submitted at the wire center level or census block as appropriate. It is necessary and appropriate for the Commission to obtain such information from all ETCs, both federal- and state-designated, to ensure the continued availability of high-quality voice services and monitor progress in achieving our broadband goals and to assist the FCC in determining whether the funds are being used appropriately. These reporting requirements ensure that ETCs comply with the conditions of the ETC designation and that universal service funds are used for their intended purposes. They also help prevent carriers from seeking ETC status for purposes unrelated to providing rural and high-cost consumers with access to affordable telecommunications and information services. Competitive ETCs whose support is being phased down are not required to file new five-year plans, but must continue to file annual updates on any previously submitted five-year plan.

- (12) 47 C.F.R. § 54.313(a)(7). The Commission seeks to ensure parity between urban and rural areas for broadband and voice rates. To accomplish this, carriers are required to report pricing information for both voice and broadband offerings.
- (13) 47 C.F.R. § 54.313(a)(8). To help the Commission reduce waste, fraud, and abuse, increase accountability in its universal service programs, and ensure compliance with various requirements that take into account holding company structure, support recipients are required to report the holding company, operating companies, affiliates, and any branding (a "dba" or "doing-business-as company" or brand designation), for each such entity by Study Area Codes.
- (14) 47 C.F.R. § 54.313(a)(10). To ensure parity between urban and rural rates, ETCs are required to submit a self-certification that the pricing of their voice services is no more than two standard deviations above the national average urban rate for voice services.
- (15) 47 C.F.R. § 54.313(a)(11). ETCs are required to submit information and data required by 47 C.F.R. § 54.313(a)(1)-(7) separately broken out for both voice and broadband service. It is necessary and appropriate for the Commission to obtain such information from all ETCs, both federal- and state-designated, to ensure the continued availability of high-quality voice services and monitor progress in achieving the Commission's broadband goals and to assist the FCC in determining whether the funds are being used appropriately. These reporting requirements ensure that ETCs comply with the conditions of the ETC designation and that universal service funds are used for their intended purposes. The Commission is not at this time seeking approval for the requirement that ETCs report information on any outage in the prior calendar year to its broadband service, as required by 47 C.F.R. § 54.313(a)(2). The Commission is not at this time seeking approval for the requirement in this section that ETCs submit the results of network performance tests.

In addition to the other reporting requirements contained in 47 C.F.R. §54.313(a), any recipient of high-cost support that serves Tribal lands must report the following additional information:

(16) 47 C.F.R. § 54.313(a)(9). To ensure the effective exchange of information that will lead to a common understanding between Tribal governments and ETCs on the deployment and improvement of communications on Tribal lands, to the extent an ETC serves Tribal lands, it is required to provide documents or information that the ETC engaged with Tribal governments.

In addition to the reporting requirements contained in 47 C.F.R. § 54.313(a), price cap carriers that receive frozen high-cost support must also provide the following additional information:

(17) 47 C.F.R. § 54.313(c). The Commission froze support under its high-cost

support mechanisms – high-cost loop support (HCLS), safety net additive (SNA), safety valve support (SVS), high-cost model support (HCMS), local switching support (LSS), interstate access support (IAS), and interstate common line support (ICLS) – for price cap carriers and their rate-of-return affiliates, and called it "frozen high-cost support." Recipients of frozen high-cost support must annually certify that increasing levels of support have been used to achieve the goal of universal availability of voice and broadband. Initially, for funding used in 2012, recipients need only certify that funding was used consistent with this goal. In future years, recipients must certify that a specified proportion of funding was used to build and operate broadband-capable networks used to offer the provider's own retail broadband service in areas substantially unserved by an unsubsidized competitor.

In addition to the reporting requirements in 47 C.F.R. § 54.313(a), any price cap carriers receiving high-cost support to offset reductions in access charges must provide the following additional information:

(18) 47 C.F.R. § 54.313(d). All price cap carriers that receive support pursuant to 47 C.F.R. § 54.304, to offset reductions in access charges, must use such support to build and operate broadband-capable networks used to offer the provider's own retail service in areas substantially unserved by an unsubsidized competitor. To monitor the use of such support and hold recipients accountable to their public interest obligations, recipients of such support must annually certify that they are doing so.

In addition to the reporting requirements in 47 C.F.R. § 54.313(a), any recipient of Connect America Phase II support shall provide the following additional information:

- 47 C.F.R. § 54.313(e)(1)-(2). Connect America will transition from Phase I, (19)which utilizes frozen and incremental support to spur broadband deployment, to Phase II, which uses a combination of a forward-looking cost model and competitive bidding to provide support for broadband deployment. Phase II has its own build-out obligations. The Commission relies on reports from Phase II funding recipients to ensure compliance with those build-out obligations. Within three years of the implementation of Phase II, funding recipients must certify that the company is providing broadband service to 85% of its supported locations at actual speeds of at least 4 Mbps downstream and 1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas. Within five years of the implementation of Phase II, recipients must certify that the company is providing broadband service to 100% of its supported locations at actual speeds of at least 4 Mbps downstream and 1 Mbps upstream, and a percentage of supported locations, as specified by the Wireline Competition Bureau, at actual speeds of at least 6 Mbps downstream and 1.5 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas.
- (20) 47 C.F.R. § 54.313(e)(3). To ensure that Phase II recipients are meeting their build-out obligations, the Commission requires a progress report on the company's five-year service quality plan. The progress report must include a letter certifying that the recipient is

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meeting the interim deployment milestones as set forth, and that it is taking reasonable steps to meet increased speed obligations that will exist for all supported locations at the expiration of the five-year term for Phase II funding. The recipient must also report the number, names, and addresses of community anchor institutions to which it newly began providing access to broadband service in the preceding calendar year.

In addition to the reporting requirements in 47 C.F.R. § 54.313(a), any rate-of-return carrier shall provide the following additional information:

- (21) 47 C.F.R. § 54.313(f)(1). Rate-of-return carriers are required to provide broadband service upon reasonable request. To monitor their progress towards meeting and complying with their public service build-out obligations, the Commission requires carriers to file a five-year service quality improvement plan, and file annually thereafter a progress report on the carrier's plan. The progress report must include a letter certifying that the carrier is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream and 1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such services are met within a reasonable amount of time. The carrier must also report the number, names, and addresses of community anchor institutions to which it newly began providing access to broadband service in the preceding calendar year.
- (22) 47 C.F.R. § 54.313(f)(2). The Commission can obtain publicly available financial information from publicly traded companies. To ensure that support is sufficient but not excessive, privately held rate-of-return carriers that receive high-cost support must submit a various forms of financial statements. Those companies that borrow funds from the Rural Utilities Service (RUS) must submit a copy of their RUS Operating Report for Telecommunications Borrowers. Carriers that do not borrow from RUS, but that undergo financial audits in the ordinary course of business, must either file a copy of their audited financial statements or provide financial information in a form consistent with the RUS Operating Report for Telecommunications Borrowers. Carriers that are not audited in the ordinary course of business must either file a financial statement that has been subject to review by a certified public accountant or file financial information in a format consistent with the RUS Operating Report for Telecommunications Borrowers. These financial disclosures may be filed pursuant to a protective order.

In addition to other applicable reporting requirements, carriers without access to terrestrial backhaul that are compelled to rely exclusively on satellite backhaul in their study areas must file the following additional certification:

(23) 47 C.F.R. § 54.313(g). The Commission recognizes that satellite backhaul may limit the performance of broadband networks as compared to terrestrial backhaul, thus carriers compelled to rely exclusively on satellite backhaul in their study area must certify that no terrestrial backhaul options exist. Any such funding recipients must certify annually that no terrestrial backhaul options exist and that they offer broadband service at actual

speeds of at least 1 Mbps downstream and 256 kbps upstream within the supported area served by satellite middle-mile facilities. Latency and capacity requirements will not apply to these providers. To the extent that new terrestrial backhaul facilities are constructed, or existing facilities improved sufficiently to meet the relevant speed, latency, and capacity requirements then in effect for broadband service supported by Connect America, within twelve months of the new backhaul facilities becoming commercially available, funding recipients must provide the certifications required in 47 C.F.R. § 54.313(e) or (f) in full.

Carriers providing updates to their reported rate information submit the following information:

47 C.F.R. § 54.313(h). All incumbent local exchange carrier recipients of high-cost support must already report all of their rates for residential local service for all portions of their service area, as well as state fees (state subscriber line charges, state universal service fees and mandatory extended area service charges), to the extent the sum of those rates and fees are below the rate floor, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1. In addition to the annual filing, local exchange carriers may file updates of their rates for residential local service, as well as state fees, on January 2 of each year. If a local exchange carrier reduces its rates and the sum of the reduced rates and state fees are below the rate floor, the local exchange carrier shall file such an update. For the update, carriers shall report lines and rates in effect as of December 1.

## **Other Requirements**

## (25) <u>Reporting Working Loops at Cost-Zone Level</u>:

Rural carriers that disaggregate and target per-line support to zones within their study area are required to report loops at the cost-zone level, which is a modification of the general rule that carriers report loops at the study-area level. *See* 47 C.F.R. §§ 54.307(b) and (c). This permits USAC to calculate the per-line support amount that will be provided to any competitive ETC serving the zone. Because per-line support will no longer need to be calculated, except in remote parts of Alaska, the burdens associated with this filing were reduced in the March 2012 supporting statement.

#### (26) <u>State Certification Letter under 254(e) of the Act:</u>

The Commission requires that states (or ETCs where the state lacks jurisdiction over ETCs) file annual certifications with the Commission to ensure that carriers use universal service support "only for the provision, maintenance and upgrading of facilities and services for which the support is intended" consistent with section 254(e). Accordingly, the Commission requires states that wish to receive federal universal service high-cost support for carriers within their boundaries (or ETCs where the state lacks jurisdiction over ETCs) to file a certification with the Commission and USAC stating that all federal high-cost funds flowing to carriers in that state has been and will be used in a manner consistent with section 254(e). Absent such certification, carriers will not receive such support. *See* 47 C.F.R. § 54.314.

The Commission recognizes that some state commissions may have only limited regulatory oversight to ensure that federal support is reflected in intrastate rates. States nonetheless may certify to the Commission that a carrier in the state has accounted to the state commission for its receipt of federal support and that such support has been and will be used "only for the provision, maintenance and upgrading of facilities and services for which the support is intended." Incumbent and competitive ETCs serving lines in the state may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission. Absent the filing of such certification, carriers will not receive support. *See* 47 C.F.R. § 54.314.

## (27) <u>Support in Competitive Study Areas</u>:

Rural carriers and competitive ETCs are required to file line count data on a quarterly basis upon competitive entry in rural carrier study areas. The rural carrier line counts are used to determine the appropriate per-line support for competitive eligible telecommunications carriers serving the same area. The competitive eligible telecommunications carrier's line counts (collected on FCC Form 525) are used to calculate their total support. Because the identical support rule has been eliminated, effective January 1, 2012, for most carriers, the burdens associated with this requirement were significantly reduced in the March 2012 supporting statement.

## (28) <u>Safety Valve</u>:

The "safety valve" mechanism enables rural carriers acquiring access lines to receive additional support over a period of five years to reflect post-transaction investment made by the acquiring carrier. Once relevant regulatory approvals are obtained and the transaction is closed, the rural carrier must provide written notice to USAC that they have acquired access lines that may become eligible for safety valve support and identify when the index year for determining eligibility began. See 47 C.F.R. § 54.305(f).

## (29) <u>Connect America Fund Phase I Incremental Support</u>:

Carriers accepting Connect America Fund Phase I incremental support will be required to meet defined broadband deployment obligations. Eligible carriers will be required to notify the Commission, USAC, as well as relevant state and Tribal authorities of the amount, if any, of funds they accept. Carriers accepting funding must certify that (a) the locations that will be served in satisfaction of the deployment requirement associated with its identified funds are shown as unserved by fixed terrestrial broadband on the then-current version of the National Broadband Map, or are shown as served only by the incumbent carrier seeking to meet build-out obligations; (b) to the best of the carrier's knowledge, its identified locations are, in fact, unserved by fixed terrestrial broadband; (c) the carrier's current capital improvement plan did not already include plans to complete broadband deployment, without CAF Phase I incremental support, within the next three years to the locations to be counted to satisfy its deployment requirement; and (d) incremental support will not be used to satisfy any merger commitment or similar regulatory obligation. Carriers accepting funding will also be required to identify, for each location to be counted toward satisfaction of the

carrier's deployment obligation, the following information: the location's census block information based on the FIPS code, the carrier's OCN, the carrier's SAC, the wire center's eight-digit CLLI code, the latitude (to 6 decimal places), and the longitude (to 6 decimal places). Carriers accepting funding have the option of providing all of the required location-identifying information at the time they file their notice of acceptance of support, or, in the alternative, they may elect to only identify the census blocks and wire centers where they will deploy. Carriers electing this latter option must provide all required information for each location no later than one year after filing notices of acceptance for purposes of satisfying the carrier's deployment obligation. That is, carriers electing to initially provide only census block and wire center information must provide complete location information for all of their locations no later than one year after they file their notices of acceptance. *See* 47 C.F.R. § 54.312(b).

In addition, to evaluate and ensure that recipients of Connect America Phase I support are meeting their public service build-out obligations, the Commission requires periodic reports on the progress of deployments. Therefore, any recipient of incremental Connect America Phase I support must certify that two years after filing a notice of acceptance of funding, the recipient has deployed to no fewer than two-thirds of the required number of locations. Three years after accepting funding, the recipient must certify that it has deployed to all required locations and that it is offering broadband service of at least 4 Mbps downstream and 1 Mbps upstream, with latency sufficiently low to enable the use of real-time communications, including Voice over Internet Protocol, and with usage caps, if any, that are reasonably comparable to those in urban areas. *See* 47 C.F.R. § 54.313(b).

We propose to reduce the burdens associated with these requirements to reflect that eight price cap carriers accepted Phase I incremental support.

### (30) Local End User Rates and State Regulated Fees:

The Commission requires carriers receiving high-cost loop support or Connect America Phase I support to report, on an annual basis, the local end user rates that fall below a specified urban rate floor and the number of lines associated with each rate. *See* 47 C.F.R. § 54.313(h). This permits USAC to calculate reductions in support. Carriers are expected to provide local end user rate and state fee information in electronic form.

### (31) <u>Recordkeeping Requirement:</u>

Carriers receiving high-cost or Connect America Fund support are subject to random compliance audits and other investigations to ensure compliance with program rules and orders, and carriers must retain records required to demonstrate to auditors that the support received was consistent with the universal service high-cost program rules. The document retention period is ten years. The carriers must make these documents and records available to the Commission, any of its Bureaus or Offices, USAC, and to their respective auditors. *See* 47 C.F.R. § 54.320(b).

## (32) <u>Annual Reporting Requirement:</u>

All ETCs must include in their annual reports the information that is currently required by section 54.313, as appropriate. All ETCs that receive high-cost support must file this information with the Commission, USAC, and the relevant state commission, relevant authority in a U.S. Territory, or Tribal government, as appropriate. See 47 C.F.R. § 54.313.

Statutory authority for this information collection is contained in 47 U.S.C. sections 151-154, 155, 201-206, 214, 218-220, 251, 252, 254, 256, 303(r), 332, 403, 405, 410, and 1302.

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

- 2. Use of information. The Commission will use the information requirements to determine whether and to what extent incumbent LECs and competitive ETCs providing the data are eligible to receive high-cost universal service support. The Commission will also use the information collections to conduct oversight and ensure that Connect America funds are spent in accordance with the rules of the program and to determine what areas should be eligible for Phase II support.
- 3. *Technological collection techniques*. In an effort to reduce any burden created by these information collection requirements, the Commission shall permit all respondents to file responses using automated, electronic, mechanical or other technological collection techniques where feasible. Respondents must file Form 481 online through USAC's "E-File" portal at <a href="https://forms.universalservice.org/usaclogin/login.asp">https://forms.universalservice.org/usaclogin/login.asp</a>.
- 4. *Efforts to identify duplication*. There will be no duplication of information. The information sought is unique to each carrier or respondent and similar information is not already available. The Commission is using already established reporting and recordkeeping requirements to satisfy certain statutory directives and eligibility criteria.
- 5. *Impact on small entities*. The collection of information may affect small entities as well as large entities. The requirements related to Phase I and the Phase II elections will not impact any small entities; only price cap carriers are subject to those collections, and no price cap carriers currently qualify as small entities. The Phase II challenge process may impact small entities; however, the impact will likely not be substantial nor will it affect a significant number of small entities. The process has been designed to limit the burden as much as possible on small entities. In addition to various substantive provisions in the rules for the challenge process, forms are made available to assist small entities in understanding what type of information should be submitted.
- 6. *Consequences if information is not collected*. The information collected is used to determine eligibility for and to calculate high-cost universal service support. Without the requested information, USAC will not be able to determine a carrier's eligibility or how much support it would receive. This may result in partial or complete denial of high-cost universal service support for the carrier. The information collected is also used to ensure compliance with the deployment requirements of Phase I and to determine what areas should receive Phase II

support. Without the submission of location information or funding usage, the Commission would be unable to verify that recipients had met their Connect America deployment obligations. Without the Phase I certifications, Phase I funds could be used to deploy to areas that are not eligible for funding, resulting in a waste of federal funds. Phase II elections are necessary to determine which carriers have chosen to receive support. Without the Phase II challenge process information, funding may be allocated to areas that already have an unsubsidized competitor, resulting in a waste of federal funds, or funding might be incorrectly withheld from an area based on an erroneous belief that the area is already served, frustrating the Commission's goal of deploying broadband-capable networks to unserved areas.

- 7. *Special circumstances*. We do not foresee any special circumstances that would cause an information collection to be conducted under extraordinary circumstances.
- 8. Federal Register notice; efforts to consult with persons outside the Commission. A 60-day notice was published in the Federal Register pursuant to 5 C.F.R. § 1320.8(d) on April 28, 2015, See 80 FR 23548. No PRA comments were received.
- 9. *Payments or gifts to respondents*. The Commission does not anticipate providing any payment or gifts to respondents.
- 10. Assurances of confidentiality. Parties may submit confidential information in relation to sub-item dd. in Item 12 below pursuant to a protective order. We note that USAC must preserve the confidentiality of all data obtained from respondents and contributors to the universal service support program mechanism; must not use the data except for purposes of administering the universal service support program; and must not disclose data in company-specific form unless directed to do so by the Commission. Also, respondents may request materials or information submitted to the Commission or to the Administrator believed confidential to be withheld from public inspection under 47 C.F.R. § 0.459 of the FCC's rules.
- 11. *Questions of a sensitive nature*. There are no questions of a sensitive nature with respect to the information collections described herein.
- 12. *Estimates of the hour burden of the collection to respondents*. The following represents the hour burden on the collections of information:
  - <u>a. Geocoded Information for Phase I Two- and Three-Year Milestone Reports (Form 481)</u> (Incorporating requirement from 3060-1188, reducing the number of respondents from 13 to 8):
  - (1) <u>Number of respondents</u>: Approximately 8. Only price cap carriers that elect to receive Phase I funding must complete these reports.

- (2) <u>Frequency of response</u>: Annually. Each price cap carrier accepting funding must file the reports annually after accepting support.
- (3) <u>Annual hour burden per respondent</u>: 6 hours per respondent for 8 carriers filing on an annual basis. Total annual hour burden is calculated as follows:
  - 8 respondents x 1 report per respondent = 8 responses x 6 hours = **48 total annual hours.**
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$1,920. (48 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>: We estimate that each Phase I funding recipient will take 6 hours to gather and submit the geocoded locations information to the Commission:
  - 8 (number of respondents) x 6 (hours to prepare report) x \$40/hr. (administrative staff time and overhead) = \$1,920.
- <u>b. Broadband Initiatives Program/Broadband Technology Opportunities Program Annual Milestone Reports (Form 481)</u> (Incorporating requirement from 3060-1188 and reducing the number of respondents from 13 to 8):
- (1) <u>Number of respondents</u>: Approximately 8. Only price cap carriers that elect to receive Phase I funding must complete these reports.
- (2) <u>Frequency of response</u>: Annually. Each price cap carrier accepting Phase I funding must file the certification in its annual report.
- (3) <u>Annual hour burden per respondent</u>: 3 hours per respondent for 8 carriers filing on an annual basis. Total annual hour burden is calculated as follows:
  - 8 respondents x 1 report per respondent = 8 responses x 3 hours = **24 total annual hours.** Carriers are required at the time of accepting funding to certify that an area is not served by BIP or BTOP projects.
  - Only minimal effort should be required to verify and certify that those initial certifications remain true.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$960. (24 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>: We estimate that each Phase I funding recipient will take 3 hours to analyze and certify to the necessary information and submit those certifications to the Commission.
  - 8 (number of respondents) x 3 (hours to prepare certifications) x \$40/hr. (administrative staff time and overhead) = \$960.

# c. Phase I Investment Annual Milestone Reports (Form 481) (Incorporating requirement from 3060-1188 and reducing the number of respondents from 13 to 8):

- (1) <u>Number of respondents</u>: Approximately 8. Only price cap carriers that elect to receive Phase I funding must complete these certifications.
- (2) <u>Frequency of response</u>: Annually. Each price cap carrier accepting funding must annually report the amount of funding used in the prior year, and report where that funding was used.
- (3) <u>Annual hour burden per respondent</u>: 20 hours per respondent for 8 carriers filing on an annual basis. Total annual hour burden is calculated as follows:
  - 8 respondents x 1 report per respondent = 8 responses x 20 hours = **160 total annual hours.**
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$6,400. (160 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>: We estimate that each Phase I funding recipient will take 20 hours to gather information related to Phase I investments and report the necessary information to the Commission.
  - 8 (number of respondents) x 20 (hours to prepare reports) x 40/hr. (administrative staff time and overhead) = 6,400.

# d. Changes in Phase I Deployments (Incorporating requirement from 3060-1188 and reducing the number of respondents from 13 to 8):

- (1) <u>Number of respondents</u>: Approximately 8. Only price cap carriers that elect to receive Phase I funding and decide to deviate from initial deployment plans would be required to file updated deployment plans.
- (2) <u>Frequency of response</u>: Occasionally. Each carrier is required to report changes whenever it seeks to deviate from its initial Phase I deployment plans.
- (3) <u>Annual hour burden per respondent</u>: 6 hours per respondent for 8 carriers filing on an occasional basis. Total annual hour burden is calculated as follows:
  - 8 respondents x 1 report per respondent = 8 responses x 6 hours = **48 total annual hours.**

Of these 48 hours, the Commission believes that:

**Reporting: 47 hours** are to prepare the deployment report changes.

**3<sup>rd</sup> Party Disclosure: 1 hour** is to notify the other existing broadband providers of these changes.

The hour burden may vary depending on the extent to which a carrier varies from its original plan.

- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$1,920. (48 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>: We estimate that each Phase I funding recipient will take 6 hours to analyze and submit any updates to its deployment plans.
  - 8 (number of respondents) x 6 (hours to prepare certifications) x \$40/hr. (administrative staff time and overhead) = \$1,920.

# <u>e. Connect America Phase II State-Level Commitment Elections</u> (Incorporating requirement from 3060-1188):

- (1) <u>Number of respondents</u>: Approximately 13. Only price cap carriers are eligible to elect to receive Phase II support through a state-level commitment.
- (2) <u>Frequency of response</u>: One-time. Carriers would make a one-time election of Phase II support.
- (3) <u>Annual hour burden per respondent</u>: 6 hours per respondent for 13 carriers filing on an occasional basis. Total annual hour burden is calculated as follows:
  - 13 respondents x 1 certification per respondent = 13 responses x 6 hours = **78 total annual hours.**
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$3,120. (78 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that each Phase I funding recipient will take 6 hours to make and submit its election. 13 (number of respondents)  $\times$  6 (hours to prepare submission)  $\times$  \$40/hr. (administrative staff time and overhead) = \$3,120.

# <u>f. Connect America Phase I Certifications</u> (Incorporating requirement from 3060-1188 and reducing the number of respondents from 13 to 8):

- (1) <u>Number of respondents</u>: Approximately 8. Only price cap carriers that elect to receive Phase I funding must complete these certifications.
- (2) <u>Frequency of response</u>: One-time, or occasionally if certifications need to be amended. Each price cap carrier accepting funding must file the appropriate certifications in connection to its acceptance of Phase I funding. A carrier will only make the certification

once (at the time of acceptance), except in circumstances where a carrier may need to update or amend its certifications, such as if it deviates from its initial deployment plan.

(3) <u>Annual hour burden per respondent</u>: 20 hours per respondent for 8 carriers filing on an occasional basis. Total annual hour burden is calculated as follows:

8 respondents x 1 election per respondent = 8 responses x 20 hours = **160 total annual hours.** 

The hour burden may vary depending on which types of deployment a carrier undertakes (i.e., whether it chooses to deploy to BIP/BTOP census blocks, locations already served by 768/200 kbps but not 3 Mbps/768 kbps, and/or locations already served by 3 Mbps/768 kbps through a copper fed DSLAM). Different types of deployment will require additional certifications.

- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$6,400. (160 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>: We estimate that each Phase I funding recipient will take 20 hours to analyze and certify to the necessary information and submit those certifications to the Commission.

8 (number of respondents) x 20 (hours to prepare elections) x 40/hr. (administrative staff time and overhead) = 6,400.

# g. Connect America Phase II Challenges and Responses (FCC Form 505) (Incorporating requirement from 3060-1188):

- (1) <u>Number of respondents</u>: Approximately 100 respondents. We anticipate that 100 parties will file challenges or responses to challenges in connection with the Phase II challenge process. When the Commission previously sought comment on updates to the National Broadband Map for purposes of determining unserved areas for Phase I of Connect America, approximately 60 comments and replies were received. The Commission expects some growth as compared to this figure due to the higher amount of funding available in Phase II and due to the fact that more criteria are used in determining whether an area is served under Phase II than in Phase I.
- (2) <u>Frequency of response</u>: Occasionally. The Phase II challenge process is a one-time event. Some parties may file more than once, serving as both a challenger and as a party being challenged.
- (3) Annual hour burden per respondent: 10 hours. Total annual hour burden is:

10 hours x 100 respondents = 1,000 hours.

Of these 1,000 hours, the Commission believes that:

**Reporting: 998 hours** are to prepare the challenges or responses to challenges.

**3<sup>rd</sup> Party Disclosure: 2 hours** are to notify the other respondents of these changes.

- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$40,000. (100 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>. We estimate that each party will take 10 hours preparing and submitting its challenge or response.

100 (number of respondents) x 10 (hours to prepare certification letter) x 40/hr. (administrative staff time and overhead) = 40,000.

# h. Projected ICLS Revenue Requirements (Rate-of-Return Carriers) (FCC Form 508) (Currently approved – no revisions):

- (1) <u>Number of respondents</u>: Approximately 766 Rate-of-Return carriers.
- (2) Frequency of response: Annual reporting requirement.

The Commission estimates that the Rate-of-Return carriers report to the Administrator their projected common line revenue requirement for each study area in which they operate.

- (3) <u>Annual hour burden per respondent</u>: 2 hours per respondent for 766 carriers that file on an annual basis. Total annual hour burden is calculated as follows: 766 respondents x 1 report per respondent = 766 responses x 2 hours, = **1,532 total annual hours**. The Commission estimates that respondents require approximately two hours to prepare and report their projected common line revenue requirements for each study area in which they operate.
- (4) <u>Total Estimate of in-house cost to respondents for the hour burden</u>: \$61,280. (1,532 hours x \$40.00/ hr.).
- (5) Explanation of calculation: We estimate that time to comply with the requirement will be 1,532 hours x \$40/hr. (administrative staff time and overhead) = \$61,280.

# <u>i. Projected ICLS Revenue Requirements (Average Schedule Carriers) (FCC Form 508)</u> (Currently approved – no revisions):

- (1) <u>Number of Respondents</u>: Approximately 366 average schedule carriers.
- (2) <u>Frequency of response</u>: Annual reporting requirement.

- The Commission estimates that the average schedule carriers are required to submit information annually that is necessary for the Administrator to calculate common line revenue requirements for average schedule companies.
- (3) <u>Annual hour burden per respondent</u>: 1 hour per respondent for 366 carriers that file on an annual basis. Total annual hour burden is calculated as follows: 366 respondents x 1 submission per respondent = 366 responses x 1 hour = **366 total annual hours**. The Commission estimates that the carriers require one hour to prepare and submit their information.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$14,640. (366 hours x \$40.00/hr.).
- (5) Explanation of calculation: We estimate that time to comply with the requirement will be  $366 \text{ hours } \times $40/\text{hr}$ . (administrative staff time and overhead) = \$14,640.

# j. Projected ICLS Revenue Requirements (Updates for Rate-of-Return Carriers) (FCC Form 508) (Currently approved – no revisions):

- (1) <u>Number of Respondents</u>: Approximately 766 Rate-of-Return carriers.
- (2) <u>Frequency of Response</u>: Annual reporting requirements.
  - Rate-of-Return carriers may voluntarily update their projected cost and revenue data annually on June 30 for the funding year ending on that date.
- (3) <u>Annual hour burden per respondent</u>: 2 hours per respondent for 766 carriers that file on an annual basis. Total annual hour burden is calculated as follows: 766 respondents x 1 response per respondent = 766 responses x 2 hours = **1,532 total annual hours**. The Commission estimates that carriers require approximately two hours to update their projected cost and revenue data annually on June 30 for the funding year.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$61,280. (1,532 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that time to comply with the requirement will be 1,532 hours x \$40/hr. (administrative staff time and overhead) = \$61,280.

# k. Projected ICLS Revenue Requirements (Updates for Average Schedule Carriers) (FCC Form 508) (Currently approved – no revisions):

- (1) Number of Respondents: Approximately 366 Average Schedule carriers
- (2) <u>Frequency of Response</u>: Annual reporting requirements.

The Commission estimates that the average schedule carriers may voluntarily update their projected cost and revenue data annually on June 30 for the funding year ending on that date

- (3) <u>Annual hour burden per respondent</u>: 1 hour per respondent for 366 carriers that are filing on an annual basis. Total annual hour burden is calculated as follows: 366 respondents x 1 response per respondent = 366 responses x 1 hour = **366 total annual hours**. The Commission estimates that carriers require approximately one hour to update their projected cost and revenue data annually on June 30 for the funding year.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$14,640. (366 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>: We estimate that time to comply with the requirement will be 366 hours x \$40/hr. (administrative staff time and overhead) = \$14,640.

### <u>l. ICLS True Ups (Annually) (FCC Form 509) (Currently approved – no revisions):</u>

- (1) <u>Number of respondents</u>: Approximately 766 Rate-of-Return carriers.
- (2) <u>Frequency of response</u>: Annual reporting requirement.
  - Rate-of-Return carriers must report on December 31st of each year, to the Administrator, their actual interstate common line cost and revenue data.
- (3) <u>Annual hour burden per respondent</u>: 4 hours per respondent for 766 carriers that file on an annual basis. Total annual hour burden is calculated as follows: 766 respondents x 1 response per respondent = 766 responses x 4 hours = **3,064 total annual hours**. The Commission estimates that each rate-of-return carrier requires approximately four hours to prepare and submit to the Administrator its actual interstate common line cost and revenue data.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$122,560. (3,064 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that time to comply with the requirement will be 3064 hours x \$40/hr. (administrative staff time and overhead) = \$122,560.

# m. ICLS True Ups (Average Schedule Carriers) (FCC Form 509) (Currently approved – no revisions):

- (1) <u>Number of respondents</u>: Approximately 366 average schedule carriers.
- (2) Frequency of response: Annual reporting requirements.

The Commission estimates that each average schedule carrier makes one information report annually.

- (3) <u>Annual hour burden per respondent</u>: 1 hour per respondent for 366 carriers that are filing on an annual basis. Total annual hour burden is calculated as follows: 366 respondents x 1 report per respondent = 366 responses x 1 hour = **366 total annual hours**. The Commission estimates that average schedule carriers require approximately one hour to submit information that is necessary for the Administrator to calculate the common line revenue requirements for average schedule companies.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$14,640. (366 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that time to comply with the requirement will be  $366 \text{ hours } \times 40/\text{hr}$ . (administrative staff time and overhead) = \$14,640.

# n. Validation of ICLS Cost and Revenue, filed in response to the Administrator's request for further validation (Currently approved – no revisions):

- (1) Number of respondents: Approximately 100 carriers.
- (2) <u>Frequency of response</u>: Annual reporting requirements.

The Commission estimates that respondents make one information submission annually.

- (3) <u>Annual hour burden per respondent</u>: 4 hours per respondent for 100 carriers that file on an annual basis. Total annual hour burden is calculated as follows: 100 respondents x 1 submission per respondent = 100 responses x 4 hours = **400 total annual hours**. The Commission estimates that respondents require approximately four hours to prepare and submit information necessary for the Administrator to calculate common line revenue requirements for average schedule companies.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$16,000. (400 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that time to comply with the requirement will be 400 hours x \$40/hr. (administrative staff time and overhead) = \$16,000.

## o. ICLS Line Counts (FCC Form 507) (Currently approved – no revisions):

- (1) Number of respondents: Approximately 1,132 Rate-of-Return carriers.
- (2) <u>Frequency of response</u>: Annually.

The Commission estimates that each carrier must file one line count data submission with the Administrator annually.

- (3) <u>Annual hour burden per respondent</u>: 6 hours per respondent for 1,132 carriers that are filing on an annual basis. Total annual hour burden is calculated as follows: 1,132 respondents x 1 submission per respondent = 1,132 responses x 6 hours, = **6,792 total annual hours**. The Commission estimates that each carrier requires approximately six hours to prepare and submit its line count data annually, by disaggregation zone, if applicable, and customer class.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$271,680. (6,792 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that time to comply with the requirement will be 6,792 hours x \$40/hr. (administrative staff time and overhead) = \$271,680.

### p. Reporting Working Loops at Cost-Zone Level (Currently approved – no revisions):

- (1) <u>Number of respondents</u>: Approximately 23. Only rural carriers or other incumbent carriers receiving Interstate Common Line Support that disaggregate their high-cost support must file this information. This requirement applies only to rate-of-return carriers serving remote parts of Alaska.
- (2) <u>Frequency of response</u>: Annual and quarterly reporting requirements.
  - If there is no competition in the service area, the carrier is required to file annually. If competition exists in the service area the carrier is required to file quarterly. Each carrier must provide NECA with numbers of working loops at the cost-zone level. We estimate that there are approximately 23 carriers that will file on a quarterly basis.
- (3) <u>Annual hour burden per respondent</u>: 8 hours per respondent for 23 carriers that will file on a quarterly basis. Total annual hour burden is calculated as follows: 23 respondents x 4 reports per respondent = 92 responses x 8 hours = **736 total annual hours.** The hour burden is not expected to vary widely because of differences in activity, size, or complexity.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$29,440. (736 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that time to comply with the requirement will be 736 hours x \$40/hr. (administrative staff time and overhead) = \$29,440.

#### q. State Certification Letter Under 254(e) (Currently approved – no revisions):

(1) <u>Number of respondents</u>: 60 respondents. (51 states, plus approximately 9 carriers will have to file this certification).

- (2) <u>Frequency of response</u>: Annual reporting requirement. Each state commission must file a letter with the Commission certifying that a carrier within the state had accounted for its receipt of federal support in its rates or otherwise used the support for the "provision, maintenance, and upgrading of facilities and services for which the support is intended" in accordance with section 254(e). Carriers that are not under a state regulatory authority will have to file with the Commission directly.
- (3) <u>Annual hour burden per respondent</u>: 3 hours. Total annual hour burden is: 3 hours x 60 respondents = **180 hours.**
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$7,200. (180 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>. We estimate that each respondent will spend 3 hours complying with this requirement. 60 (number of respondents) x 3 (hours to prepare certification letter) x \$40/hr. (administrative staff time and overhead) = \$7,200.

# <u>r. Support in Competitive Study Areas: (FCC Form 525) (Currently approved – no revisions)</u>:

- (1) <u>Number of respondents</u>: 15. Approximately 14 competitive ETCs serving remote parts of Alaska and one tribally owned competitive ETC will have to submit line count data quarterly.
- (2) <u>Frequency of response:</u> Quarterly reporting requirement. Each carrier must file line count data with USAC upon competitive entry in rural carrier study areas.
- (3) <u>Annual hour burden per respondent</u>: 6 hours. Total annual hour burden is: 15 respondents x 6 hours x 4 reports per respondent = **360 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$14,440. (360 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that 15 competitive ETCs will submit line count data quarterly x 6 hours to complete x \$40/hr. (administrative staff time and overhead) when preparing the worksheet. 360 hours x \$40/hour = \$14,400.

### s. Safety Valve (Currently approved – no revisions):

- (1) <u>Number of respondents</u>: 25 rural carriers will have to file a notice.
- (2) <u>Frequency of response</u>: On occasion reporting requirement and third party disclosure requirement. Rural carriers shall provide written notice to USAC when their index year has been established for purposes of calculating eligibility for safety valve support.

- (3) <u>Annual hour burden per respondent</u>: .5 hours. Total annual hour burden is: 25 respondents x .5 hours = Approximately 13 hours (rounded up).
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$500. (13 hours x \$40/hr.).
- (5) <u>Explanation of calculation</u>: We estimate that each carrier will spend .5 hour drafting a notice to USAC indicating when their index year has been established for purposes of calculating eligibility for safety valve support. 25 (number or respondents) x .5 (hours to prepare certification letter) x \$40/hr. (administrative staff time and overhead) = \$500.

# t. Connect America Fund Phase I Incremental Support Acceptance (Currently approved – reducing the number of respondents from 9 to 8):

- (1) <u>Number of respondents</u>: Approximately 8 holding companies of price cap carriers will have to report the incremental funding, if any, they accept. Those carriers accepting funding will also be required to identify by wire center and census block the areas to which they will deploy broadband service.
- (2) <u>Frequency of response</u>: On occasion. The Commission intends to make funds available annually until this support mechanism is terminated. Eligible carriers must file with the Commission, USAC, as well as relevant state and Tribal authorities.
- (3) <u>Annual hour burden per respondent</u>: 6 hours per respondent for 8 respondents filing annually. Total annual hour burden is: 8 respondents x 6 hours = **48 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$1,920. (48 hours x \$40/hour.).
- (5) Explanation of calculation: We estimate that each carrier accepting funding will spend at least 6 hours reporting the funding they accept and identify the applicable wire center and census blocks they will be deploying broadband to meet their deployment obligations. 8 (number of respondents) x 6 (hours to identify the applicable wire center and census blocks and prepare the relevant reporting documents) x \$40/hr. (administrative staff time and overhead) = \$1,920.

## <u>u. Local End User Rates and State Regulated Fees (Currently approved – no revisions):</u>

- (1) <u>Number of respondents</u>: Fewer than 1,434 companies (1,141 rate-of-return carriers and 293 price cap carriers) will have to report local end user rates and state regulated fees.
- (2) <u>Frequency of response</u>: Annually. Each carrier must file the Rate Floor Data Collection Form with USAC. Among other information, the form contains all local end user rates that fall below a specified urban rate floor and the number of lines associated with each rate. Mid-year updates are permitted.

- (3) <u>Annual hour burden per respondent</u>: 4 hours per respondent for 1,434 respondents filing on an annual basis. Total annual hour burden is: 1,434 respondents x 4 hours = **5,736 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$229,440. (5,736 hours x \$40/hour.).
- (5) Explanation of calculation: We estimate that each carrier will spend at least 4 hours filtering and tabulating end user rates for each line that falls below a specified urban rate floor and indicating the specific line associated with each rate. 1,434 (number of respondents) x 4 (hours to tabulate end user rates for each line and to prepare the relevant reporting documents) x \$40/hr. (administrative staff time and overhead) = \$229,440.

### v. Recordkeeping Requirements (Currently approved – no revisions):

- (1) <u>Number of Respondents</u>: Approximately 1,857 telephone companies.
- (2) <u>Frequency of Response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 2 hours per respondent for 1,857 respondents retaining documents on an annual basis. Total annual hour burden is: 1,857 respondents x 2 hours = **3,714 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden:</u> \$148,560 (3,714 hours x \$40/hour.).
- (5) <u>Explanation of calculation:</u> We estimate that each carrier will spend at least 2 hours tracking document retention periods. 1,857 (number of respondents) x 2 (hours to comply with document retention requirements) x \$40 per hour (administrative staff time and overhead) = \$148,560.

# w. Annual Reporting Requirements for All Funding Recipients (Currently approved – no revisions):

- (1) <u>Number of Respondents</u>: Approximately 1,857 telephone companies.
- (2) <u>Frequency of Response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 100 hours per respondent for 1,857 respondents filing on an annual basis. Total annual hour burden is: 1,857 respondents x 100 hours = **185,700 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden:</u> \$7,428,000 (185,700 hours x \$40/hour.).

(5) Explanation of calculation: We estimate that each carrier will spend a total of at least 100 hours tracking, filtering, tabulating, assessing and preparing reporting requirements: 1,857 (number of respondents) x 100 (hours tracking, filtering, tabulating, assessing and preparing reporting requirements) x \$40 per hour (administrative staff time and overhead) = \$7,428,000.

### x. Tribal Engagement Reporting (Currently approved – no revisions):

- (1) <u>Number of Respondents</u>: Approximately 300 carriers that serve Tribal lands.
- (2) <u>Frequency of Response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 4 hours per respondent for 300 respondents filing on an annual basis. Total annual hour burden is: 300 respondents x 4 hours = **1,200 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden:</u> \$48,000 (1,200 hours x \$40/hour.).
- (5) Explanation of calculation: We estimate that each carrier serving Tribal lands will spend a total of at least 4 hours preparing, reviewing, and submitting its report on Tribal engagement: 300 (number of respondents) x 4 (hours preparing, reviewing, and submitting report) x \$40 per hour (administrative staff time and overhead) = \$48,000.
- y. Connect America Fund Phase I Incremental Support Certification (Currently approved reducing the number of respondents from 9 to 8 and the burden hours to reflect the annualized burden over three years):
- (1) <u>Number of respondents</u>: Approximately 8 holding companies of price cap carriers will have to report the incremental funding, if any, they accept. Those carriers accepting funding will also be required to certify that they are meeting certain broadband deployment milestones.
- (2) <u>Frequency of response</u>: Occasionally. Carriers accepting Phase I Incremental Support will be required to file this information in annual reports two and three years after acceptance. Eligible carriers must file with the Commission, USAC, as well as relevant state and Tribal authorities.
- (3) <u>Annual hour burden per respondent</u>: 15 hours per respondent for 8 respondents filing 2 reports over a three year period. Total annual hour burden is: 8 respondents x 2 reports x 15 hours/3 years = **80 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$3,200 (80 hours x \$40/hour).

(5) <u>Explanation of calculation</u>: We estimate that each carrier accepting Phase I incremental support will spend at least 15 hours certifying that it is meeting the required broadband deployment milestones. 8 (number of respondents) x 15 (hours to confirming and certifying compliance) x \$40/hour (administrative staff time and overhead) = \$4,800.

# <u>z. Price Cap Carrier Frozen High Cost Support Certification (Currently approved – no revisions):</u>

- (1) <u>Number of respondents</u>: Approximately 293 price cap carriers receiving Connect America frozen support will have to certify that they are using incrementally increasing portions of their frozen support to deploy broadband-capable networks and to offer their own retail broadband service in areas substantially unserved by an unsubsidized competitor.
- (2) <u>Frequency of response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 15 hours per respondent for 293 respondents filing annually. Total annual hour burden is: 293 respondents x 15 hours = **4,395 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$175,800. (4,395 hours x \$40/hour.).
- (5) Explanation of calculation: We estimate that each price cap carrier receiving frozen support will spend at least 15 hours certifying that it is using incrementally increasing portions of its frozen support to deploy broadband-capable networks and to offer its own retail broadband service in areas substantially unserved by an unsubsidized competitor. 293 (number of respondents) x 15 (hours to confirm and certify compliance) x \$40/hr. (administrative staff time and overhead) = \$175,800.

# <u>aa. Price Cap Carrier High-Cost Support for Access Charges Certification (Currently approved – no revisions):</u>

- (1) <u>Number of respondents</u>: Approximately 293 price cap carriers receiving high-cost support designed to offset access charges will have to certify that support received pursuant to 47 C.F.R. § 54.304 in the prior calendar year was used to build and operate broadband-capable networks used to offer provider's own retail service in areas substantially unserved by an unsubsidized competitor.
- (2) <u>Frequency of response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 15 hours per respondent for 293 respondents filing annually. Total annual hour burden is: 293 respondents x 15 hours = **4,395 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$175,800. (4,395 hours x \$40/hour.).

(5) Explanation of calculation: We estimate that each price cap carrier receiving support to offset reductions in access charges will spend at least 15 hours certifying that it is using high-cost support received pursuant to 47 C.F.R. § 54.304 to deploy broadband-capable networks and to offer its own retail broadband service in areas substantially unserved by an unsubsidized competitor. 293 (number of respondents) x 15 (hours to confirm and certify compliance) x \$40/hr. (administrative staff time and overhead) = \$175,800.

## bb. Connect America Fund Phase II Certification (Currently approved – no revisions):

- (1) <u>Number of respondents</u>: Approximately 13 carriers or holding companies receiving Connect America Phase II support will be required to certify that there are meeting certain build-out milestones and submit progress reports on five-year service quality plans.
- (2) <u>Frequency of response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 30 hours per respondent for 13 respondents filing annually. Total annual hour burden is: 13 respondents x 30 hours = **390 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$15,600. (390 hours x \$40/hour.).
- (5) <u>Explanation of calculation</u>: We estimate that each Phase II funding recipient will spend at least 30 hours certifying that meeting deployment milestones and drafting the additional required items for its five-year service quality plan progress report. 13 (number of respondents) x 30 (hours to track, filter, tabulate, assess, and prepare reporting requirements for progress report and confirming and certifying compliance with build-out milestones) x \$40/hr. (administrative staff time and overhead) = \$15,600.

### cc. Rate-of-Return Carrier Certification (Currently approved – no revisions):

- (1) <u>Number of respondents</u>: Approximately 1,141 rate-of-return carriers will be required to certify that they are meeting certain build-out milestones and submit progress reports on five-year service quality plans.
- (2) <u>Frequency of response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 30 hours per respondent for 1,141 respondents filing annually. Total annual hour burden is: 1,141 respondents x 30 hours = **34,230 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$1,369,200. (34,230 hours x \$40/hour.).
- (5) <u>Explanation of calculation</u>: We estimate that each rate-of-return carrier will spend at least 6 hours certifying that meeting deployment milestones and drafting the additional

required items for its five-year service quality plan progress report. 1,141 (number of respondents) x 30 (hours to track, filter, tabulate, assess, and prepare reporting requirements for progress report and confirming and certifying compliance with build-out milestones) x \$40/hr. (administrative staff time and overhead) = \$1,369,200.

# <u>dd. Privately Held Rate-of-Return Carrier Certification (Currently approved – no revisions):</u>

- (1) <u>Number of respondents</u>: Approximately 625 privately held rate-of-return carriers will be required to submit financial statements.
- (2) <u>Frequency of response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 15 hours per respondent for 625 respondents filing annually. Total annual hour burden is: 625 respondents x 15 hours = **9,375 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$375,000. (9,375 hours x \$40/hour.).
- (5) <u>Explanation of calculation</u>: We estimate that each privately held rate-of-return carrier will spend at least 15 hours filing its RUS Operating Report for Telecommunications Borrowers, audited financial statements, or financial statements reviewed by a certified public accountant. 625 (number of respondents) x 15 (hours to prepare and submit financial statements) x \$40/hr. (administrative staff time and overhead) = \$375,000.

# <u>ee. Carriers Lacking Terrestrial Backhaul Certification (Currently approved – no revisions)</u>:

- (1) <u>Number of respondents</u>: Fewer than 20 carriers that receive funding but rely exclusively on satellite for backhaul must certify as to the performance of their broadband service.
- (2) <u>Frequency of response</u>: Annually.
- (3) <u>Annual hour burden per respondent</u>: 15 hours per respondent for 20 respondents filing annually. Total annual hour burden is: 20 respondents x 15 hours = **300 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$12,000. (300 hours x \$40/hour.).
- (5) Explanation of calculation: We estimate that each carrier receiving funding but relying exclusively on satellite for backhaul will spend at least 15 hours certifying as to the performance of its broadband service. 20 (number of respondents) x 15 (hours to confirm and certify compliance) x \$40/hr. (administrative staff time and overhead) = \$12,000.

#### ff. Residential Rate Updates (Currently approved – no revisions):

- (1) <u>Number of respondents</u>: Fewer than 20 carriers that have rates falling below the rate floor and make adjustments to their rates in the course of the year will file an update.
- (2) <u>Frequency of response</u>: On occasion.
- (3) <u>Annual hour burden per respondent</u>: 4 hours per respondent for 20 respondents filing occasionally. Total annual hour burden is: 20 respondents x 4 hours = **80 hours**.
- (4) <u>Total estimate of in-house cost to respondents for the hour burden</u>: \$3,200. (80 hours x \$40/hour.).
- (5) Explanation of calculation: We estimate that each carrier that files a residential rate update will spend at least 4 hours reporting its rates. 20 (number of respondents) x 4 (hours to gather and report rates) x \$40/hr. (administrative staff time and overhead) = \$3,200.

## The estimated respondents and responses and burden hours are listed below:

Information Collection Requirements	Number of Respondents	Number of Responses Per Year	Estimated Time per Response (hours)	Total Burden Hours	In-house Office and Overhead Costs
a. Geocoded Information for Phase I Two- and Three-Year Milestone Reports	8	8	6	48	\$1,920.00
b. Broadband Initiatives Program/ Broadband Technology Opportunities					
Program Annual Milestone Reports	8	8	3	24	\$960.00
c. Phase I Investment Annual Milestone Reports	8	8	20	160	\$6,400.00
d. Changes in Phase I Deployments	8	8	6	48	\$1,920.00

e. Connect America Phase II State- Level Commitment Elections	13	13	6	78	\$3,120.00
f. Connect America Phase I Certifications	8	8	20	160	\$6,400.00
g. Connect America Phase II Challenges and Responses	100	100	10	1,000	\$40,000.00
h. Projected ICLS Revenue Requirements (Rate-of-Return) (FCC Form 508)	766	766	2	1,532	<b>\$61,280.00</b>
i. Projected ICLS Revenue Requirements (Average Schedule Carriers) (FCC Form 508	366	366	1	366	\$14,640.00
j. Projected ICLS Revenue Requirements (Updates for Rate- of-Return Carriers) (FCC Form 508)	766	766	2	1,532	\$61,280.00
k. Projected ICLS Revenue Requirements (Updates for Average Schedule Carriers) (FCC Form 508)	366	366	1	366	\$14,640.00

l. ICLS True Ups (Annually) (FCC Form 509)	766	766	4	3064	\$122,560.00
m. ICLS True Ups (Average Schedule Carriers) (FCC Form 509)	366	366	1	366	\$14,640.00
n. Validation of ICLS Cost and Revenue, filed in response to the Administrator's request for further validation	100	100	4	400	\$16,000.00
o. ICLS Line Counts (FCC Form 507)	1,132	1,132	6	6792	\$271,680.00
p. Reporting Working Loops at Cost-Zone Level	23	92	8	736	\$29,440.00
<u>q. State</u> <u>Certification Letter</u> <u>Under 254(e)</u>	60	60	3	180	\$7,200.00
r. Support in Competitive Study Areas: (FCC Form 525)	15	60	6	360	\$14,400.00
s. Safety Valve	25	25	0.5	13	\$500.00

t. Connect America Fund Phase I Incremental Support Acceptance	8	8	6	48	\$1,920.00
u. Local End User Rates and State Regulated Fees	1,434	1,434	4	5,736	\$229,440.00
v. Recordkeeping Requirements	1,857	1,857	2	3,714	\$148,560.00
w. Annual Reporting Requirements for All Funding Recipients	1,857	1,857	100	185,700	\$7,428,000.00
x. Tribal Engagement Report	300	300	4	1,200	\$48,000.00
y. Connect America Fund Phase I Incremental Support Certification	8	6	15	80	\$3,200.00
z. Price Cap Carrier Frozen High Cost Support Certification	293	293	15	4,395	\$175,800.00

aa. Price Cap Carrier High-Cost Support for Access Charges Certification	293	293	15	4,395	\$175,800.00
bb. Connect America Fund Phase II Certification	13	13	30	390	\$15,600.00
cc. Rate-of-Return Carrier Certification	1,141	1,141	30	34,230	\$1,369,200.00
dd. Privately Held Rate-of-Return Carrier Certification	625	625	15	9,375	\$375,000.00
ee. Carriers Lacking Terrestrial Backhaul Certification	20	20	15	300	\$12,000.00
ff. Residential Rate Updates	20	20	4	80	\$3,200.00

## **TOTALS:**

Total Number of Respondents: 1,957 unique respondents filing multiple times.

**Total Number of Responses Annually: 12,885** 

Total Annual Hourly Burden for requirements (a) – (ff): 266,868

Total Annual "In-House" Costs: \$10,674,700

- 13. *Estimates for the cost burden of the collection to respondents*. There are no outside contracting costs for this information collection. See the last column in the chart in item 12 above for the estimated in-house costs.
- 14. *Estimates of the cost burden to the Commission*. There will be few, if any, costs to the Commission because notice and enforcement requirements are already part of Commission duties. Moreover, there will be minimal cost to the federal government since an outside party will administer this program.
- 15. *Program changes or adjustments*. The Commission is reporting adjustments to this information collection which are due to the consolidation of the information collection requirements contained in OMB Control Number 3060-1188 into this collection and also the Commission made adjustments to its previously approved estimates. Therefore, the respondents increased from 1,857 to 1,957 (100), the total annual responses decreased from 13,185 to 12,885 (253) and the total annual burden hours increased from 265,411 to 266,868 (1,457).

There are no program changes.

- 16. *Collections of information whose results will be published.* Non-proprietary information will likely be made publicly available. The Commission plans to make some of this information available publicly. Information related to Phase I deployments will be released by the Commission. Data regarding the locations that received broadband under the program and data regarding where Connect America money was spent are included in recipients' annual reports, which are publicly available. Phase I certifications will be made public, either through the Commission's Electronic Comment Filing System (ECFS) or through release by the Commission. Phase II elections are made publicly. The Commission plans to make Phase II challenge process information public through the issue of .csv files.
- 17. Display of expiration date for OMB approval of information collection. The Commission seeks continued approval to not display the OMB expiration date on FCC Form 525, FCC Form 481, FCC Form 505, FCC Form 507, FCC Form 508 and FCC Form 509. The Commission will use an edition date in lieu of an OMB expiration date. This is necessary so that when the OMB expiration date changes, the Commission does not have to update electronic versions or destroy paper stocks. Finally, the Commission publishes a list of all OMB-approved information collections, including this one, in 47 C.F.R. § 0.408.
- 18. *Exceptions to certification statement for Paperwork Reduction Act submissions (Item 19 of OMB Form 83-I)*. There are no exceptions to the certification statement.

#### **B.** Collections of Information Employing Statistical Methods:

The Commission does not anticipate that the collection of information will employ statistical methods.