Request for Approval under the "Generic Clearance for the Collection of Routine Customer Feedback" (OMB Control Number: 3060-1149)

TITLE OF THE STUDY: Generic Clearance for the Collection of Participant Input and Feedback to Improve Functionality and Design of Eligible Locations Adjustment Process (ELAP) Module

PURPOSE:

The Universal Service Administrative Company (USAC), in conjunction with the FCC's Wireline Competition Bureau (Bureau), is designing a module to accept information collected pursuant to the Eligible Locations Adjustment Process (ELAP), a Commission-ordered challenge process designed to facilitate adjustments to the defined deployment obligations of carriers receiving universal service funding (USF) awarded through the Connect America Fund (CAF) Phase II Auction (participants). The Commission will seek the Office of Management and Budget (OMB) approval of these requirements under a new control number. By opening the ELAP module, in relevant part, for voluntary pre-testing by participants, the Commission and USAC will receive feedback that may help improve module functionality and design before submitting the new information collection to OMB.

Background. Pursuant to the ELAP, participants may seek reduction, on a state-by-state basis, of their defined deployment obligations (and associated support), subject to challenge by interested parties meeting certain eligibility criteria, i.e., stakeholders. Participants and stakeholders must submit eligible location evidence, during their respective filing windows, in a module (ELAP module) in the High Cost Universal Broadband Portal (HUBB). In addition, participants and stakeholders will submit limited contact information, and stakeholders will submit information establishing their verifiable interests. If stakeholders or participants want to access information in each other's filings that is not published on the publicly available map, they will also submit in the ELAP module, protective order acknowledgements subject to challenge by the relevant participant. Access to non-public information will also be limited to the parties' geographic areas of interest.   Based on a preponderance of information submitted by parties, the Bureau will determine, on a case-by-case basis, whether to reduce the participant's defined deployment obligations for a state.

Pre-Testing Environment. Participants may access the pre-testing environment online as a module in USAC's HUBB (High Cost Broadband Portal). The environment will allow carriers to upload files that will be collected pursuant to ELAP, including 1) a file summarizing location information for all eligible locations within the study area where the participant is seeking an adjustment to its defined deployment obligation (locations information); (2) a file describing the

participants methodology for identifying all locations qualifying for support (methods description); and (3) a file or set of files containing supporting evidence, such as copies of public records, aerial photography, location information for non-eligible locations, or similar evidence (supporting evidence). As part of this upload process, participants will also enter limited contact information and make certifications as to the truth and accuracy of their submissions. USAC will conduct limited verifications on the information submitted and provide feedback as described in the attached guide. Participants may then modify their submissions.

USAC, however, will only maintain this information in the system during the pre-testing period (not to exceed a four-week timeframe) and for the limited purpose of testing the function and design of the system. All such information will then be destroyed.

Feedback. Pre-testing provides USAC with feedback relating to functionality and design of the HUBB module that will be proposed for ELAP. With the express consent of pre-testers, USAC will monitor pre-tester use of the environment to gain immediate feedback on the module's capabilities, such as accepting uploads, returning error codes, and processing deletions and modifications to submissions. In addition, pre-testers may submit feedback on the ELAP module functionality and design remotely using a variety of technologies, including applications such as Webex, telephone, chat, and/or email, as is most convenient. For example, a pre-tester might provide feedback on system usability by noting that certain information is difficult to locate or that certain actions are difficult to complete. Based on the information gathered through monitoring and from direct feedback, USAC may then conduct interviews and focus groups to refine module design.

DESCRIPTION OF RESPONDENTS:

Participation in pre-testing is voluntary. Respondents include recipients of CAF Phase II auction support.

TYPE OF COLLECTION: (Check one)
[ ] Customer Comment Card/Complaint Form   [ ] Customer Satisfaction Survey
[X] Usability Testing (e.g., Website or Software   [ ] Small Discussion Group
[ ] Focus Group   [ ] Other:

CERTIFICATION:
I certify the following to be true:
1.   The collection is voluntary.
2.   The collection is low-burden for respondents and low-cost for the Federal Government.
3.   The collection is non-controversial and does not raise issues of concern to other federal agencies.
4.   The results are not intended to be disseminated to the public.

5. Information gathered will not be used for the purpose of <u>substantially</u> informing <u>influential</u> policy decisions.
6. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.

Name: Pre-Testing of ELAP Module

To assist review, please provide answers to the following question:

Personally Identifiable Information:
1. Is personally identifiable information (PII) collected? [ ] Yes [X] No
2. If Yes, will any information that is collected be included in records that are subject to the Privacy Act of 1974? N/A
3. If Yes, has an up-to-date System of Records Notice (SORN) been published? N/A

Gifts or Payments:
Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? [ ] Yes [X] No

BURDEN HOURS:

Category of Respondent	No. of Respondents	Participation Time	Burden
Recipients of CAF Phase II auction support	60	3 hours	180 hours
Totals	**60**	**3 hours**	**180 hours**

FEDERAL COST: There will be few, if any additional costs to the Commission because notice, enforcement, and policy analysis associated with the Universal Service Fund are already part of the Commission's duties. Moreover, there will be minimal cost to the Federal government since a third party (USAC) will administer the program.

<u>If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:</u> N/A

The selection of your targeted respondents

1. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?
                                                                                    [X] Yes [ ] No

If the answer is yes, please provide a description of both below (or attach the sampling plan)? If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?

The Commission has a list of the names of all carriers receiving support awarded through the CAF Phase II Auction. There is a total 198 carrier/state combinations eligible to participate in ELAP. The ELAP module will be open for pre-testing to any of these carriers on a state-by-state basis. Pre-testers will self-select.

Administration of the Instrument
1. How will you collect the information? (Check all that apply)
   [X] Web-based or other forms of Social Media
   [X] Telephone
   [ ] In-person
   [ ] Mail
   [X] Other, Explain: WebEx
2. Will interviewers or facilitators be used? [X] Yes [ ] No

Please make sure that all instruments, instructions, and scripts are submitted with the request. (See attached database field descriptions and user guide).