

Introductions to High Cost Verifications

Alaska Plan

5-Year Milestone Review



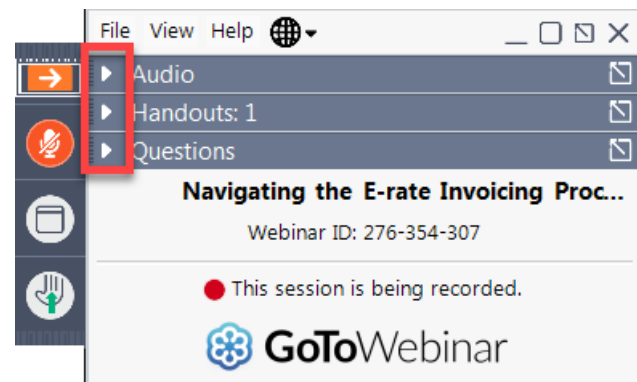
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HOUSEKEEPING – WEBINAR PANEL

- The webinar panel is located on the right-hand side of the screen.
- Open the panel by clicking the orange arrow.

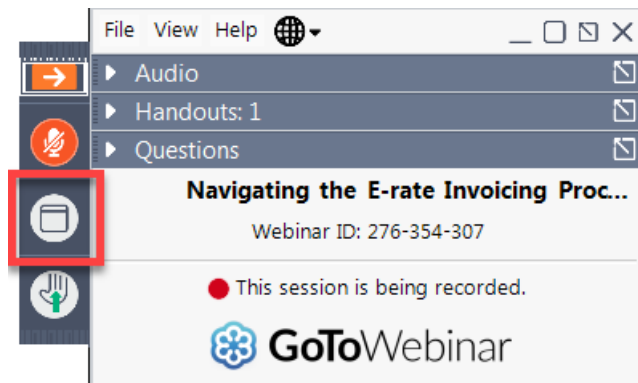


- Use the white arrows to open the sections in the panel.

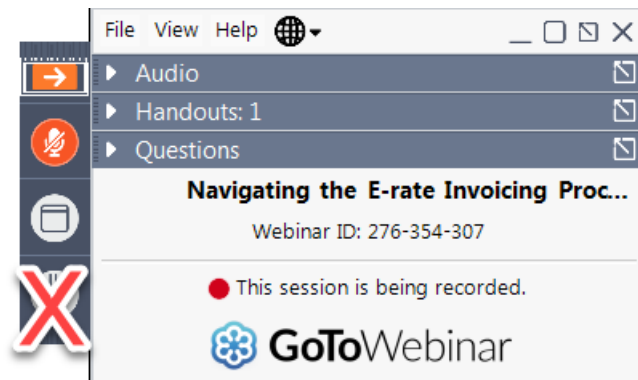


HOUSEKEEPING – WEBINAR PANEL

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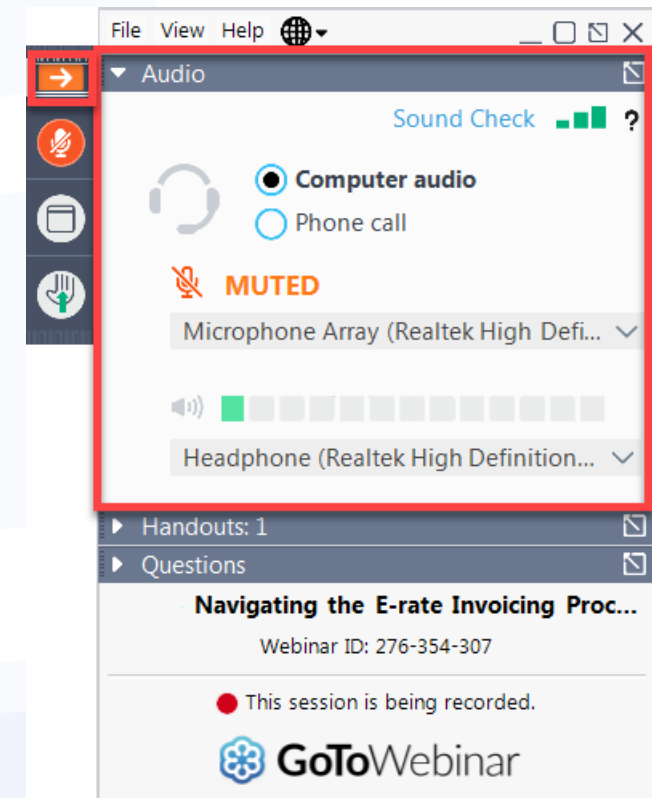


- We are not using the hand raise function.



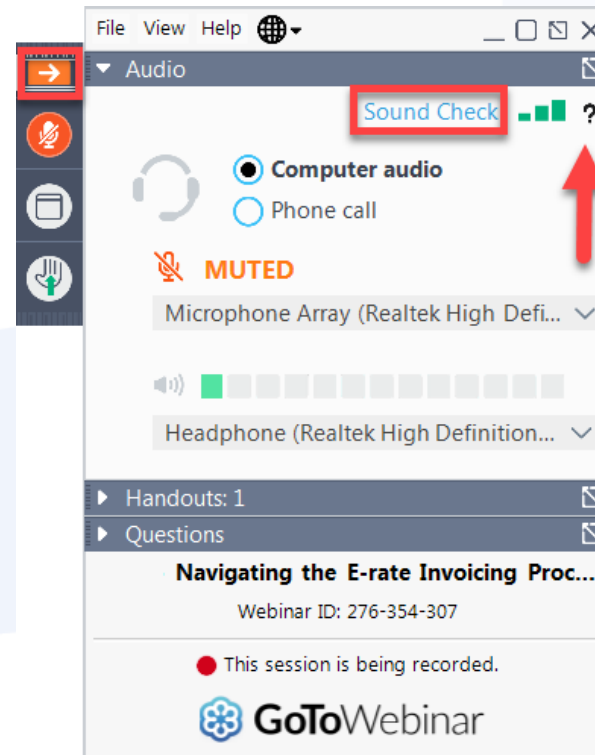
HOUSEKEEPING – AUDIO

- Use the “Audio” section of your control panel to select an audio source.
- Choose one of the audio options:
 - Your computer's audio
 - Call in using an access code and audio PIN.
- The audience will remain on mute during the Q&A session.
 - Moderators will be facilitating questions.

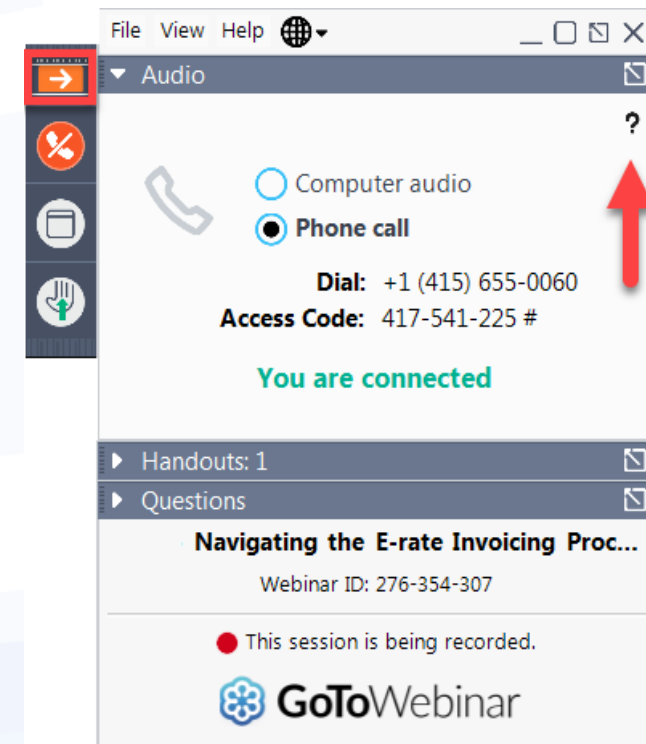


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- Use the “Sound Check” link and click question mark icon for audio help.
- Exit webinar, and click the ["check system requirements" link](#) in the event confirmation email to determine whether your computer meets the requirements to see and hear the webinar.
- If issues persist, call 877-582-7011 to [troubleshoot with GoToWebinar](#).



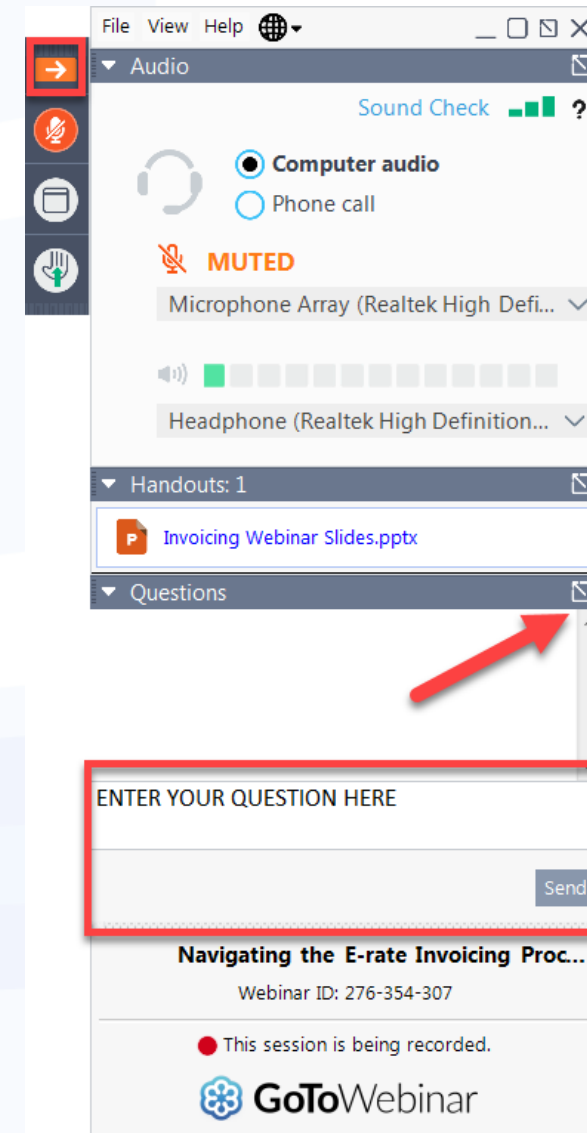
Computer Audio



Phone Call

HOUSEKEEPING – Q&A

- **There will be a live Q&A session focused on today's topics.**
- Tips for submitting questions:
 - Use the “Questions” box in your webinar control panel anytime during the presentation.
 - Click the box with the arrow above the questions box to expand it and see all written answers.
 - Write in full sentences.
 - Ask one question at a time.
 - Ask questions related to webinar content.



The screenshot displays a webinar control panel with several sections:

- Audio:** Includes a "Sound Check" indicator, a "MUTED" status, and options for "Computer audio" (selected) and "Phone call". It also shows microphone and headphone settings.
- Handouts:** Lists "Invoicing Webinar Slides.pptx".
- Questions:** A section with a red arrow pointing to a box containing the text "ENTER YOUR QUESTION HERE" and a "Send" button.
- Webinar Information:** Displays the title "Navigating the E-rate Invoicing Proc...", the ID "Webinar ID: 276-354-307", and a recording status "This session is being recorded." with a red dot icon.
- GoToWebinar:** The logo and name are visible at the bottom.

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Agenda

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Alaska Plan Program Overview: Deployment Milestones and Reporting Dates by Program Year for Wireline¹ and Wireless² Carriers

Year	Program Year	Deploy By	Report By
2021	Year 5	12/31/2021	3/1/2022
2026	Year 10	12/31/2026	3/1/2027

¹ 47 C.F.R. § 54.316(b)(6); 47 C.F.R. § 54.308(c)

² 47 C.F.R. § 54.321; 47 C.F.R. § 54.308(d)

Verification Process Overview

Purpose & Objectives

Sharing Data Using Box

Preparing for Verifications

Please visit <https://www.usac.org/high-cost/resources/fund-verification-reviews/> for more information

Verification Process Overview: Purpose & Objectives

Purpose

- Uphold integrity of the Alaska Plan program by ensuring adherence to program rules and requirements.

Objectives

- Ensure that the company has met the Program Year 2021 milestone obligation with respect to the number of locations deployed *or* the population served.
- Verify that carriers deployed service meeting the relevant performance plan obligations and offer broadband packages that meet the FCC's price benchmark.
- Wireless carriers: ensure that Carrier has deployed network that meets the relevant speed tier(s) highlighted in the carrier-specific performance plan to the required total population by the relevant milestone date.
- Wireline carriers: for each sampled location record, confirm that:
 - The structure at the location is eligible for funding
 - The reported service address accurately corresponds with the reported coordinates
 - Available upload and download speeds meet performance plan speed requirements or higher
 - Qualifying service was deployed in time to meet the relevant milestone date
 - The actual number of units matches the reported number of units

Verification Process Overview: Sharing Data Using Box

- Documents will be exchanged via Box, USAC's secure file sharing platform.
- USAC does not make public any documentation received from the company.
- When sharing supporting documentation, please do the following:
 - Redact Personally Identifiable Information (PII) for any customers (customer names, phone numbers, SSN, etc.)
 - Supply only what is requested and which specifically addresses the requirements of the review
 - If necessary, you may password protect files

Verification Process Overview: Preparing for Verifications

1. By now, you have received an email from the Verification Team requesting that you complete and submit a process questionnaire and examples of supporting documentation via Box upload link.
 - This questionnaire helps the Team understand company's processes for identifying and reporting deployed locations.
 - Verification Team will also analyze the example documentation provided and work with the company to make sure documentation is sufficient for verification purposes.
2. Company contact receives an email from the Verification Team, notifying them that the Announcement Letter and a spreadsheet containing the location records selected for the statistically valid verification sample* are available for download in a new Box folder.
3. Company contact uploads supporting documentation to the same Box folder mentioned in #2.

*Applies only to wireline carriers

Wireline Verification Process Overview

Testing Sampled Locations
Calculating Verification Results
Reporting Verification Results

Please visit <https://www.usac.org/high-cost/resources/fund-verification-reviews/> for more information

Wireline Verification Process Overview: Testing Sampled Locations

- The Verification Team analyzes supporting documentation submitted by the company to verify that **speed** and **deployment date** for each location record in the sample is in compliance with program requirements. Additionally, the Verification Team will analyze company submitted documentation that supports **unit count** for location records with multiple units reported (Note: Each *unit* in a *location record* is considered a *location*).
 - If the Verification Team is unable to verify a location record, the Team will reach out to the company for an explanation or additional documentation.
- In addition, the Verification Team verifies that...
 - The reported address and coordinates for the location record correspond
 - The structure at the coordinates is eligible for support

No documentation from the company is requested for these items. If the team is unable to verify these items, the team will reach out to the company for more information.

Wireline Verification Process Overview: Reviewing Structure Eligibility and Individual Units

Ineligible Structures

These structures will **not** pass review and **should not** be reported in the HUBB:

- Empty parcels of land, vacant structures that are condemned or are to be demolished or open to the elements
- Boats, recreational vehicles (RVs), tents, caves, and similar types of structure that no one is using as a residence
- Wireless infrastructure sites, such as cell towers
- The location of the network's pedestal, box, or node
- Group quarters (dormitories, nursing homes, military installations, correctional facilities)
- Community anchor institutions (schools, libraries, hospitals, other medical providers, public safety entities, and community support organizations that facilitate greater use of broadband by vulnerable populations, including low-income, the unemployed, and the aged)

Eligible Structures

These **should** be reported in the HUBB:

- Residential locations
- Business locations (that company expects would demand consumer-grade broadband service)
- Residential or Business locations to which service could be provided within 10 business days

Other key reporting guidelines:

- The latitude/longitude of location should be situated somewhere on the parcel of the location.
- Buildings with multiple units, such as an apartment building, must be reported in a single location record.
 - If the units are in separate buildings, they must be reported in separate location records and thus contain unique latitude and longitude coordinates.

See [DA-16-1363](#) for more information on broadband location reporting

Wireline Verification Process Overview: Calculating Verification Results

- If a location record does not meet minimum speed requirements, was not deployed on time, or the structure was found to be ineligible, then the location record is deemed ineligible for support and not credited toward the company's milestone obligation.
- If a location record's unit count was found to be incorrectly reported, the company will not receive credit for the excess reported locations.
- The Verification Team deems the ineligible and incorrectly reported units, mentioned above, as failures.
- These failing locations found in the verification sample are extrapolated to the total population of locations that are eligible for testing (Note: no location records are removed from the HUBB portal by the Verification Team), then the company's estimated passing locations are credited toward their milestone obligation. It is then determined whether or not the company is in compliance with their milestone obligation.

Verification Process Overview: Reporting Verification Results

1. Company contact will receive email from Verification Team, notifying them that their Verification Closure Letter(s), containing the results of the verification, is available for download in the Box folder.
 - If necessary, the company can request to have a conference with the Verification Team to discuss verification results.
2. Ten business days from the date of the Verification Closure Letter, the company is required to submit a response to the letter to the Verification Team in the Box folder. This response may be a simple message to state that the company agrees with the results of the verification or the company may dispute the results of the verification. Carriers can also provide additional documentation if such was not provided during the verification process. Note: Responding to the Verification Closure Letter is NOT a formal appeal.
3. Once the Verification Team receives the company's response, the Team may provide a reply to the company's response. The company's response and the Verification Team's response will be appended to the Verification Closure Letter and shared with the company and the FCC. (Note: No additional responses will be afforded to the company after USAC provides final response).
4. If the company was found to be in a compliance gap tier, the FCC will issue a Default Letter to the company and instruct USAC to implement remedial measures, which range from quarterly reporting to reductions in support (See [CFR 54.320](#)). Company has 30 days to submit an appeal following the issuance of the Default Letter from the FCC.

Wireline Supporting Documentation

Key Points to Keep in Mind

Common Documentation Types and Examples

Please visit <https://www.usac.org/high-cost/resources/fund-verification-reviews/> for more information

Wireline Supporting Documentation: Key Points to Keep in Mind



- USAC reminds all companies to retain all records and analysis needed to demonstrate that universal service support is being used in accordance with High Cost Program rules (see [47 CFR Section 54.320\(b\)](#)).
- To allow for unique differences between companies, USAC does not require any specific type of documentation (aka evidence) to be submitted across all verifications.
 - For example, each company is not required to submit *provisioning system screenshots* specifically as part of their documentation.
- Supply only what is requested in the Announcement Letter and which specifically addresses the objectives of the review (i.e. verification of broadband **speed**, deployment **date**, and **unit count** (for location records with multiple units)).
- Companies may need to submit more than just one piece of evidence to support all objectives for a particular record in the HUBB portal.
- **Redact Personally Identifiable Information** (PII) for any customers.

Wireline Supporting Documentation: Key Points (Continued)

- Each piece of evidence must also contain information linking the displayed speed, date, or unit count to the specific associated location record(s).
 - Linking information could include things like customer address, coordinates, CLLI code or device name, etc.
- Each location record selected in the verification sample is assigned an item # in the Company Sample spreadsheet sent along with the Announcement Letter.
- In general, if an evidence file only applies to one location record, please include the item # in the file name when uploading verification files to Box.
 - Ex. “Item 17 – Subscriber Bill.pdf”

Supporting Documentation Examples: Subscriber Bill

- Linking information Provided:
 - Full customer address
- Verification Objectives Supported:
 - **Date** where service was available
 - Broadband **speed** at the location
 - Specific **unit** denotation (if a separate bill for each unit is provided, then together they can support the total unit count for a multi-unit location record)
- Customer PII is redacted

		Billing Date 12/22/18 New Charges Due Date 1/09/19 Previous Balance 84.83 Payments Received Thru 12/08/18 -84.83 Balance Forward .00 New Charges 84.83 TOTAL AMOUNT DUE \$84.83	
ACCOUNT SUMMARY			
ACCOUNT NUMBER:	PIN NUMBER:		
[REDACTED]	[REDACTED]		
		PAYMENT STUB Total Amount Due \$84.83 New Charges Due Date 1/09/19 Account Number [REDACTED] Amount Enclosed \$ _____	
[REDACTED] CUSTOMER STREET ADDRESS CUSTOMER UNIT NUMBER/UNIT NAME CUSTOMER CITY, STATE, ZIP CODE		MAIL TO: ABC PHONE COMPANY PHONE COMPANY STREET ADDRESS PHONE COMPANY CITY, STATE, ZIP CODE	
MONTHLY SERVICE CHARGES FROM 12/22/18 to 1/21/19 Digital Phone Unlimited 30.99 Broadband Service 10/1 29.99 TOTAL MONTHLY SERVICE CHARGES 60.98		DETAIL OF TAXES AND OTHER CHARGES DETAIL OF FEDERAL TAXES AND CHARGES* Federal Excise Tax .26 Access Recovery Charge 1.98 Primary Federal Subscriber Line Charge 6.50 Federal USF Recovery Charge 1.71 Telecom Long Distance — Federal USF Surcharge 2.61 TOTAL FEDERAL TAXES AND CHARGES 13.06 STATE TAXES AND OTHER CHARGES 6.80 TOTAL TAXES AND OTHER CHARGES 19.86 <small>*INCLUDES BASIC CHARGES</small>	
OTHER SERVICE CHARGES AND CREDITS Carrier Cost Recovery Surcharge 3.99 TOTAL OTHER SERVICE CHARGES AND CREDITS 3.99			
TAXES AND OTHER CHARGES Federal Taxes and Charges* 13.06 State Taxes and Other Charges* 6.80 TOTAL TAXES AND OTHER CHARGES 19.86			
TOTAL 84.83			
		<small>*INCLUDES BASIC CHARGES</small>	

Supporting Documentation Examples: Provisioning System Screenshot

- Linking information Provided:
 - Full customer address
 - Coordinates
 - DSLAM CLLI Code
- Verification Objectives Supported:
 - Broadband **speed** at the location
 - Specific **unit** denotation (if a separate screenshot for each unit is provided, then together they can support the total unit count for a multi-unit location record)

QUALIFY ADDRESS FOR BROADBAND SERVICE

ADR: CUSTOMER STREET ADDRESS

CUSTOMER UNIT NUMBER/UNIT NAME

CUSTOMER CITY, STATE, ZIP CODE

LAT/LONG: 38.8977° N 77.0365° W

CLASS OF SERVICE: TELEPHONE:

UPSTREAM BANDWIDTH: 1M DOWNSTREAM BANDWIDTH: 10M

TECHNOLOGY: COMBO MINIMUM TECHNOLOGY: DSL

SERVING TERMINAL: X-123/4

DSLAM: NYNYNYXE1 ACPT: X-123/4

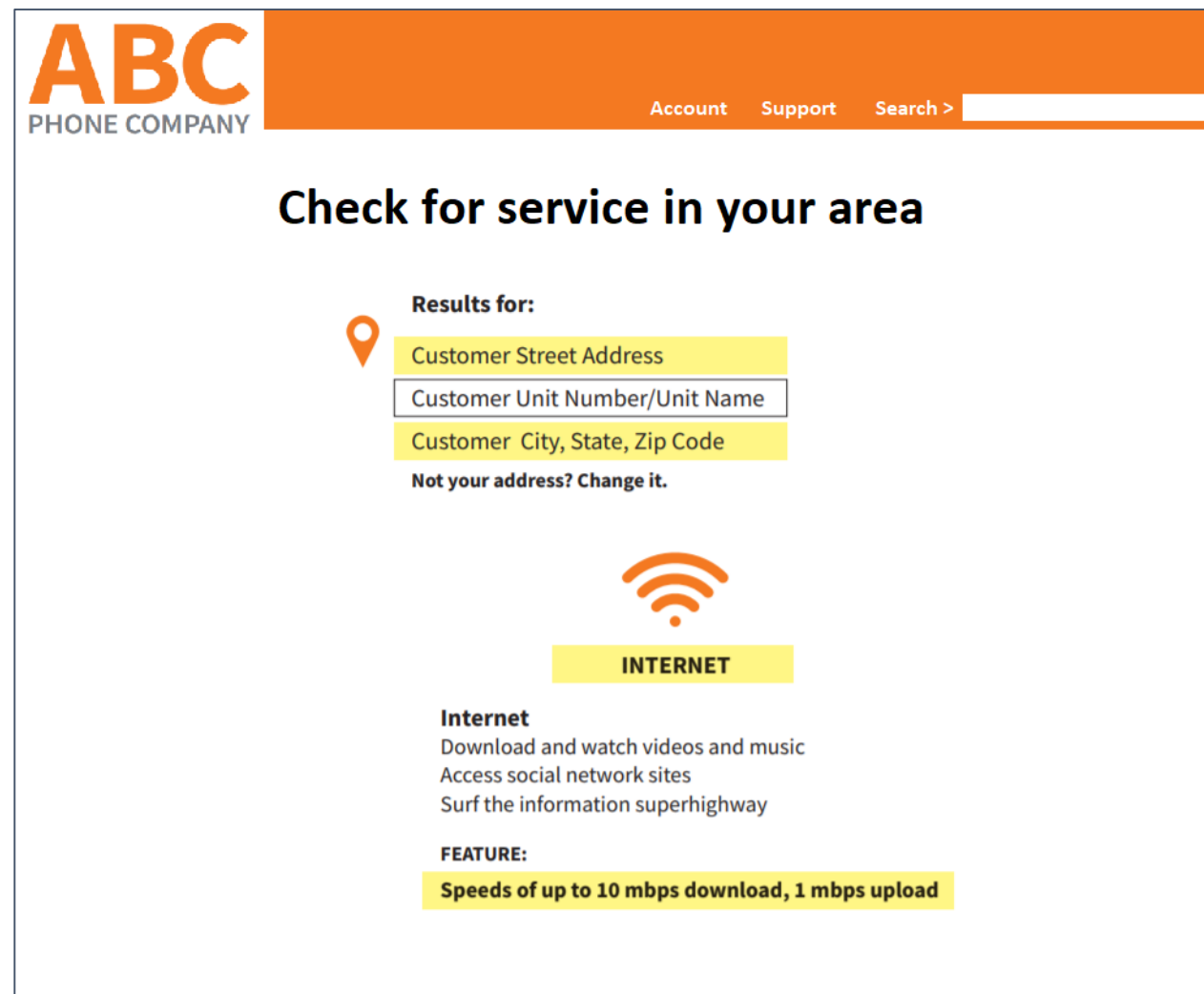
GENERIC CARD TYPE: COMBO

RELIABLE DSL AID:

ENTER NEXT TASK CODE:

Supporting Documentation Examples: Public Facing Service Availability Tool Screenshot

- Linking information Provided:
 - Full customer address
- Verification Objectives Supported:
 - Broadband **speed** at the location
 - Specific **unit** denotation (if a separate screenshot for each unit is provided, then together they can support the total unit count for a multi-unit location record)



The screenshot shows the ABC Phone Company website's service availability tool. The header includes the ABC logo and navigation links for Account, Support, and a search bar. The main heading is "Check for service in your area". Below this, a location pin icon is followed by a "Results for:" section with three input fields: "Customer Street Address", "Customer Unit Number/Unit Name", and "Customer City, State, Zip Code". A link "Not your address? Change it." is provided. The results section features a Wi-Fi icon, a yellow "INTERNET" label, and a list of services: "Internet", "Download and watch videos and music", "Access social network sites", and "Surf the information superhighway". A "FEATURE:" section highlights "Speeds of up to 10 mbps download, 1 mbps upload".

Supporting Documentation Examples: Engineer Certification

- Linking information Provided:
 - Device name
 - (would also need supplementary documentation showing which locations were associated with “123 exchange”)
 - Full license # and state where licensed
- Verification Objective Supported:
 - Broadband **speed** at the location
 - **Date** when service was available (should include month, day, and year)

XYZ
ENGINEERING

ENGINEERING FIRM STREET ADDRESS
ENGINEERING FIRM CITY, STATE, ZIP CODE

April 18, 2018

Re: Engineering Certification of Gigabit Technology and Coverage

Dear USAC Representative,

XYZ Engineering Company has reviewed the maps, designs and equipment specifications for the ABC Phone Company fiber network build-out in the 123 exchange of Anytown, USA.

I certify that they meet or exceed the CAF II performance requirements and have the capability of providing gigabit speeds for any CAF II eligible locations within these exchanges. All locations within Anytown, USA are covered by 123 exchange and the 100% fiber network capable of delivering up to 1 gig service. The fiber in this location was live and in effect by December 31, 2017.

If you have any questions or need additional information, please let us know.

Best regards,
Signature

Firstname Lastname
Title
XYZ Engineering Company
123.456.7891
name@email.com
License #456789
State Licensed: VA

Supporting Documentation Examples:

Construction Completion Sign-off Sheet / Acceptance Test

- Linking information Provided:
 - DSLAM CLLI Code
 - (would also need supplementary documentation showing which locations were associated with this DSLAM)
- Verification Objective Supported:
 - **Date** when service was available
 - (include completion date, signature, and sign-off date)

ACCEPTANCE TEST						
Facility: Any City, USA		WBS No.: 000-0000		COM acceptance to be done by: XYZ		
Location: Anytown, USA		Engineer:				
Spec issue date:						
Install start date:				Install completion date: 4/14/2016		
ITEM	INSPECTION CHECKLIST	Task to be done by:	DateShop	COM	Completed by (name[s]):	ACCEPTED by COM Initials Date
0	Review spec & drawing					4/15/2016
1	Inventory Material			<input checked="" type="checkbox"/>	First Name, Last Name	FNLN 4/15/2016
2	Provision & tum up system			<input checked="" type="checkbox"/>	First Name, Last Name	FNLN 4/15/2016
3	Complete redlines, leave copies with COs & copy in job folder					
4	Notify engineer when equipment is accepted & ready for traffic			<input checked="" type="checkbox"/>	First Name, Last Name	FNLN 4/15/2016
5	DSLAM name or CLLI code: NYNYNYXE1					
CO Installer verification CO Installation tasks are complete and ready for inspection by COM.						
Signature of CO Installer:		Signature			Date: 4/15/2016	
COM Maintenance Acceptance				Partial Acceptance		
If partial acceptance, what exceptions remain?				<input checked="" type="checkbox"/> Final Acceptance		
Remarks:						
Final acceptance by CO Foreman						
Signature of CO Foreman or designee:					Date: 4/15/2016	

Supporting Documentation Examples: Released for Sales Email

- Linking information Provided:
 - DSLAM CLLI Code
 - (would also need supplementary documentation showing which locations were associated with this DSLAM)
- Verification Objective Supported:
 - **Date** when service was available



Wed 6/21/2017 9:48 am

Doe, John

Re: Released for Sale

To: Richard Roe, Sales

DSLAM

NYNYNYXE1

is built and ready for release.

John Doe

Specialist, Network Engineer

Company Communications

123-456-7890

website.url

Supporting Documentation

Examples:

Evidence of Multiple Units

- Screenshots of a mapping software street view or satellite view that provide evidence of the number of units
 - Ex. Images showing two separate front entrances or two separate driveways (see images to the right)
- Screenshots from an apartment complex website, property tax website or real estate website (such as Realtor.com, Xome, Trulia, Redfin, etc.) showing the number of units
- Geotagged photos or video clips (taken using a mobile phone or camera with geotagging turned on) that provide evidence of the number of units
 - Ex. Images of separate electric meters or separate mailboxes
 - Please also include a screenshot of the file properties page for each picture or video that displays the associated latitude/longitude coordinates



Street Level Photo

- Shows two units — two entrances and two mail boxes.



High Altitude Photo

- Shows two units — two separate driveways and walkways that lead to two separate entrances.

Wireless Verification Process Overview

Testing Population Obligation

Supporting Documentation

Reporting Verification Results

Please visit <https://www.usac.org/high-cost/resources/fund-verification-reviews/> for more information

Verification Process Overview: Testing Population Obligation

- For purposes of the five-year milestone review, the Verification Team will utilize the Alaska Population-Distribution Model to review coverage map shapefiles submitted in the Form 477 filings (as of December 31, 2021) and determine the size of the population that carriers are able to serve.
- The Verification Team will also evaluate data submitted in the HUBB Middle-Mile Portal to verify that mobile participants are providing their committed-to speeds and technology to the populations delineated in their performance plans.

Supporting Documentation: Last-Mile

During the verification for mobile-provider participants, USAC will do the following:

- 1) Utilize Form 477, middle-mile data, and 2010 census data for evaluation purposes of the five-year milestone.
- 2) Verify that mobile-provider participants of the Alaska Plan have met their milestone commitments.
 - USAC *may* ask that carriers conduct drive tests in USAC-specified areas (more details to come later), and request or analyze other relevant data or information.

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 - If necessary, the company can request to have a conference with the Verification Team to discuss verification results.
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4. If the company was found to be in a compliance gap tier, the FCC will issue a Default Letter to the company and instruct USAC to implement remedial measures, which range from quarterly reporting to reductions in support (See [CFR 54.320](#)). Company has 30 days to submit an appeal following the issuance of the Default Letter from the FCC.

Verification Timeline and Next Steps

By Friday, March 25	Company submits completed process questionnaire and example supporting documentation to Box
By Friday, April 1	Verification Team sends Announcement Letter and Company Sample to Company
April to Mid-May	Company submits documentation as requested in Company specific announcement letter to Box
August to September	Verifications Team sends Verification Closure Letter to Company
Shortly after delivery of Verification Closure Letter	Verification Team sends Verification Feedback Survey to Company

Verification timelines and due dates vary depending on the company's sample size. Exact due dates for documentation submissions will be listed in the Announcement Letter.

Thank You!



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