**Universal Service
Administrative Co.**

High Cost and Low Income Committee

Briefing Book

Monday, October 28, 2019

2:00 p.m. - 4:30 p.m. Eastern Time

Universal Service Administrative Company Offices

700 12th Street, N.W., Suite 900

Washington, D.C. 20005

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Universal Service Administrative Company
High Cost & Low Income Committee Quarterly Meeting
Agenda

Monday, October 28, 2019
2:00 p.m. – 4:30 p.m. Eastern Time
USAC Offices
700 12th Street, N.W., Suite 900
Washington, D.C. 20005

	HIGH COST OPEN SESSION	*Estimated Duration in Minutes*

Chair	**a1.** Consent Items (each available for discussion upon request):
	   A. Approval of High Cost & Low Income Committee Meeting Minutes of July 29, 2019
	   B. Approval of moving all *Executive Session* items into *Executive Session*
		5

Vic	**a2.** Approval of High Cost Support Mechanism 1st Quarter 2020 Programmatic Budget and Demand Projection for the November 1, 2019 FCC Filing	10
Kianna Braxton - Johnson	**i1.** Information on Two USAC Internal Audit Division High Cost Support Mechanism Beneficiary Audit Reports	5

Vic
 	
Sammy
	i2. High Cost Support Business Update
	  • July Board Recap
	  • High Cost Program at a Glance
	  • High Cost Order Updates
	  • About the CAF II Auction Project
	  • Eligible Locations Adjustment Process (ELAP)
	  • Digital Opportunity Data Collection (DODC)
	  • Q3 2019 Summary (*For Information Only*)
		30

HIGH COST EXECUTIVE SESSION

Confidential – *Executive Session Recommended*

Craig	**a3.** Consideration of Two Three-Month Contract Options for High Cost Model Operations and Maintenance (CostQuest)	10

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	LOW INCOME OPEN SESSION	*Estimated Duration in Minutes*
Michelle	**a4.** Approval of Low Income Support Mechanism 1st Quarter 2020 Programmatic Budget and Demand Projection for the November 1, 2019 FCC Filing	10
Jeanette Santana-Gonzalez	**i3**. Information on Two USAC Internal Audit Division Low Income Support Mechanism Beneficiary Audit Reports	5

Michelle	**i4.** Low Income (Lifeline) Business Update
	
	 • July Board Recap
	 • National Verifier
	    o Implementation
	    o Status of Applications
	    o Impact of CMS Connection in Hard Launched States
	    o Common Documentation Mistakes
	    o Automated State Database Update
	 • Lifeline Program at a Glance
	 • Q3 2019 Summary (*For Information Only*)
		25

	LOW INCOME EXECUTIVE SESSION **Confidential** – *Executive Session Recommended*	
Michelle	**i4.** Low Income (Lifeline) Business Update (*continued*) • Program Integrity Update	20
Chair	**i5.** *Executive Session* Discussion with the Committee/Board	10

Next Scheduled USAC High Cost & Low Income Committee Meeting

Monday, January 27, 2020   **2:00 p.m. – 5:00 p.m. Eastern Time**   **USAC Offices, Washington, D.C.**

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Universal Service Administrative Company
High Cost & Low Income Committee Meeting

ACTION ITEM

Consent Items

Action Requested

The High Cost & Low Income Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the consent items listed below.

Discussion

The Committee is requested to approve the following items using the consent resolutions below:

A. Committee meeting minutes of July 29, 2019 (*see* **Attachment A**).

B. Approval of moving all *Executive Session* items into *Executive Session*:

   (1) **a3** – Consideration of Two Three-Month Contract Options for High Cost Model Operations and Maintenance. USAC management recommends that this item be discussed in *Executive Session* because it relates to USAC's *procurement strategy and contract administration*.
   (2) **i4 –** Low Income Support Mechanism Business Update *(Continued)*. USAC management recommends that this matter be discussed in *Executive Session* because it relates to *specific internal controls and/or confidential company data* that would constitute a discussion of internal rules and procedures. In addition, this item may include discussion of *internal rules and procedures* concerning the administration of the universal service support mechanisms where discussion of the matter in open session would result in *disclosure of confidential techniques and procedures* that would compromise program integrity.
   (3) **i5** – *Executive Session* Discussion with the Committee/Board. USAC management recommends this item be discussed in *Executive Session* because it relates to the Committee's oversight responsibilities and may involve discussion of *internal rules and procedures* concerning the administration of the universal service support mechanisms, where discussion of the matter in open session would result in *disclosure of confidential techniques and procedures* that would compromise program integrity.

Upon request of a Committee member, any one or more of the above items are available for discussion by the Committee.

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Recommended USAC High Cost & Low Income Committee Action

APPROVAL OF THE FOLLOWING RESOLUTION:

        RESOLVED, that the USAC High Cost & Low Income Committee hereby approves: (1) the Committee meeting minutes of July 29, 2019; and (2) discussion in *Executive Session* of the items noted above.

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UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
700 12th Street NW, Suite 900
Washington, D.C. 20005

HIGH COST & LOW INCOME COMMITTEE MEETING
Monday, July 29, 2019

(DRAFT) MINUTES[1]

The quarterly meeting of the High Cost & Low Income Committee (Committee) of the USAC Board of Directors (Board) was held at USAC's offices in Washington, D.C. on Monday, July 29, 2019. Mr. Joe Gillan, Committee Chair, called the meeting to order at 2:01 p.m. Eastern Time, with a quorum of 8 of the 11 Committee members present:

Freeman, Sarah	Lubin, Joel
Gerst, Matthew	Mason, Ken
Gillan, Joe – Chair	Sekar, Radha – Chief Executive Officer
Jacobs, Ellis	Wein, Olivia – Vice Chair

Mr. Atilla Tinic joined the meeting at 2:08 p.m. Eastern Time. He did not vote on item a1.

Members of the Committee not present:

Feiss, Geoff
Kinser, Cynthia

Other Board members and officers of the corporation present:

Ayer, Catriona – Vice President of Schools and Libraries
Beckford, Ernesto – Vice President, General Counsel, and Assistant Secretary
Beyerhelm, Chris – Vice President of Enterprise Portfolio Management
Buzacott, Alan – Member of the Board
Davis, Craig – Vice President of Procurement and Sourcing Strategy
Delmar, Teleshia – Vice President of Audit and Assurance
Fontana, Brent – Member of the Board
Gaither, Victor – Vice President of High Cost
Garber, Michelle – Vice President of Lifeline
Hutchinson, Kyle – Vice President, Chief Information Officer
Salvator, Charles – Vice President of Finance, Chief Financial Officer and
     Assistant Treasurer

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[1] Draft resolutions were presented to the Committee prior to the Committee meeting. Where appropriate, non-substantive changes have been made to the resolutions set forth herein to clarify language, where necessary, or to correct grammatical or spelling errors.

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Sweeney, Mark – Vice President of Rural Health Care
Wibberly, Dr. Kathy – Member of the Board

Others present:

NAME	COMPANY
Abera, Nikki	USAC
Alomari, Ghanem	USAC
Beaver, Tracey	USAC
Bilodeau, Amanda	USAC
Caldwell, Micah	FCC
Carpenter, Nikki-Blair	USAC
Gustafson, Jaymie	USAC
Horn, Kathleen	USAC
Hughet, Pam	USAC
Kahn, Sammy	USAC
Lawson, Suzanne	USAC
Lee, James	USAC
Miller, Arielle	USAC
Miller, Katie	USAC
Mitchell, Tamika	USAC
Nuzzo, Patsy	USAC
Santana-Gonzales, Jeanette	USAC
Simab, Habib	USAC
Smith, Chris	USAC
Stephens, Karen Rena	USAC
Streauslin, Brandi	USAC
Tessler, Joelle	USAC
Tiwari, Tanya	USAC
Ward, Rashonda	USAC
Weith, Tim	USAC
Williams, Romanda	USAC

HIGH COST OPEN SESSION

All materials from *Open Session* can be found on the USAC website.

a1.   **Consent Items.**   Mr. Gillan presented this item to the Committee:

   A.   Approval of Committee Meeting Minutes of April 29, 2019 and June 6, 2019.

   B.   Approval of Moving all *Executive Session* Items into *Executive Session*:

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(1) **i4 –** Low Income Support Mechanism Business Update *(Continued)*. USAC management recommends that this matter be discussed in *Executive Session* because it relates to *specific internal controls and/or confidential company data* that would constitute a discussion of internal rules and procedures. In addition, this item may include discussion of *internal rules and procedures* concerning the administration of the universal service support mechanisms where discussion of the matter in open session would result in *disclosure of confidential techniques and procedures* that would compromise program integrity.

(2) **i5** – *Executive Session* Discussion with the Committee/Board. USAC management recommends this item be discussed in *Executive Session* because it relates to the Committee's oversight responsibilities and may involve discussion of *internal rules and procedures* concerning the administration of the universal service support mechanisms, where discussion of the matter in open session would result in *disclosure of confidential techniques and procedures* that would compromise program integrity.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolution:

RESOLVED, that the USAC High Cost & Low Income Committee hereby approves: (1) the Committee meeting minutes of April 29, 2019 and June 6, 2019; and (2) discussion in *Executive Session* of the items noted above.

a2. **Approval of High Cost Support Mechanism 4th Quarter 2019 Programmatic Budget and Demand Projection for the August 2, 2019 Filing.** Mr. Gaither presented this item for consideration. The presentation included a written report on USAC management's recommendations for the High Cost Support Mechanism 4th quarter 2019 programmatic budget and demand projection for the August 2, 2019 FCC filing.

On a motion duly made and seconded and after discussion, the Committee adopted the following resolutions:

RESOLVED, that the USAC High Cost & Low Income Committee approves a 4th Quarter 2019 High Cost Support Mechanism direct program budget of $5.01 million; and

RESOLVED FURTHER, that the USAC High Cost & Low Income Committee directs USAC staff to submit a collection requirement of $5.01 million for High Cost Support Mechanism administrative costs in the

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required August 2, 2019 filing to the FCC on behalf of the Committee; and

RESOLVED FURTHER, that the USAC High Cost & Low Income Committee, having reviewed at its meeting on July 29, 2019 the 4th Quarter 2019 High Cost Support Mechanism demand estimate of $1,365.47 million, hereby directs USAC staff to proceed with the required August 2, 2019 filing to the FCC on behalf of the Committee. USAC staff may make adjustments if the total variance for the High Cost Support Mechanism is equal to or less than $10 million, or may seek approval from the Committee Chair to make adjustments if the total variance is greater than $10 million, but not more than $15 million.

i1. **Information on One USAC Internal Audit Division High Cost Support Mechanism Beneficiary Audit Reports.** The Committee received a report with information on one USAC Audit and Assurance Division High Cost Support Mechanism beneficiary audit report. The report was provided for informational purposes; no discussion was held on this item.

i2. **High Cost Support Mechanism Business Update.** Mr. Gaither presented PowerPoint slides covering the following:
   a. Recap of Action Items and Updates from Previous Committee Meetings
   b. High Cost Program at a Glance
   c. High Cost Order Updates

LOW INCOME OPEN SESSION

a3. **Approval of Low Income Support Mechanism 4th Quarter 2019 Programmatic Budget and Demand Projection for the August 2, 2019 FCC Filing.** Ms. Garber presented this item to the Committee for consideration. The presentation included a written report on USAC management's recommendations for the Low Income Support Mechanism 4th quarter 2019 programmatic budget and demand projection for the August 2, 2019 FCC filing.

On a motion duly made and seconded and after discussion, the Committee adopted the following resolutions:

RESOLVED, that the USAC High Cost & Low Income Committee approves a 4th Quarter 2019 Low Income Support Mechanism direct program budget of $13.20 million; and

RESOLVED FURTHER, that the USAC High Cost & Low Income Committee directs USAC staff to submit a collection requirement of $13.20 million for Low Income Support Mechanism administrative costs in the

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required August 2, 2019 filing to the FCC on behalf of the Committee; and

    RESOLVED FURTHER, that the USAC High Cost & Low Income Committee, having reviewed at its meeting on July 29, 2019 the 4th Quarter 2019 Low Income Support Mechanism demand estimate of $250.25 million, hereby directs USAC staff to proceed with the required August 2, 2019 filing to the FCC on behalf of the Committee. USAC staff may make adjustments if the total variance for the Low Income Support Mechanism is equal to or less than $10 million, or may seek approval from the Committee Chair to make adjustments if the total variance is greater than $10 million, but not more than $15 million.

i3. **Information on Two USAC Audit and Assurance Division Low Income Support Mechanism Beneficiary Audit Reports.** The Committee received a report with information on two USAC Audit and Assurance Division Low Income Support Mechanism beneficiary audit reports. The reports were provided for informational purposes; no discussion was held on this item.

i4. **Low Income Support Mechanism (Lifeline) Business Update.** Ms. Garber presented PowerPoint slides covering the following topics to the Committee for discussion:
    a. April Board Recap
    b. National Verifier:
      • Current Status
      • Implementation Update
      • Automated State Database Update
      • Automated State Database Challenges
      • Stakeholder Feedback and Lifeline Response
    c. Representative Accountability Database (RAD):
      • Status
      • How it works
    d. Lifeline Program at a Glance

At 3:20 p.m. Eastern Time, on a motion duly made and seconded, the Committee moved into *Executive Session* for the purpose of discussing the confidential items listed above.

LOW INCOME EXECUTIVE SESSION

i4. **Low Income Support Mechanism (Lifeline) Business Update** *(continued).* Ms. Garber presented PowerPoint slides that covered the following:

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    a. National Verifier Implementation Risks and Mitigation
    b. Program Integrity Update

i5.   *Executive Session* **Discussion with the Committee/Board**. No discussion was held on this item, and there was no associated report.

LOW INCOME OPEN SESSION

At 3:44 p.m. Eastern Time, the Committee moved out of *Executive Session* and immediately reconvened in *Open Session*, at which time Mr. Gillan reported that, in *Executive Session*, the Committee discussed item i4 above.

On a motion duly made and seconded, the Committee adjourned at 3:45 p.m. Eastern Time.

/s/ Ernesto Beckford
Assistant Secretary

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Universal Service Administrative Company
High Cost & Low Income Committee Meeting

ACTION ITEM

Approval of High Cost Support Mechanism
1st Quarter 2020 Programmatic Budget and
Demand Projection for the November 1, 2019 FCC Filing

Action Requested:

The High Cost & Low Income Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the 1st Quarter 2020 (1Q2020) programmatic budget and demand projection for the High Cost Support Mechanism for submission to the Federal Communications Commission (FCC) in USAC's November 1, 2019 quarterly filing.

Discussion:

On a quarterly basis, USAC is required to submit to the FCC each program's budget[1] and projected demand for the upcoming quarter.[2]

Funding Requirement

Based on data filed by supported carriers and FCC authorizations, USAC estimates the 1Q2020 funding requirement for the High Cost Support Mechanism as follows:

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[1] *See* 47 C.F.R. § 54.715(c).
[2] *See* 47 C.F.R. § 54.709(a)(3).

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Table A. Summary of Program Funding Requirement
*See **Attachment 1** for further detail*

(in millions)	4Q2019	Increase/ (Decrease)	1Q2020	Notes
Steady State:				
Legacy Funds	$549.55	$(127.10)	$422.45	Includes HCLS, CAF BLS, and Frozen Price Cap and Competitive ETC Support
Modernization Funds	775.69	82.94	858.63	Includes CAF Phase II, CAF Phase II Auction, CAF ICC, Alaska Plan Support, A-CAM I, Revised A-CAM I, A-CAM II, RBE, and Mobility Fund Phase I
Amounts Paid from Reserve	(77.64)	4.53	(73.11)	Disbursements for RBE, Mobility Fund Phase I, and portion of A-CAM I.
Total Steady State	***$1,247.60***	***($39.63)***	***$1,207.97***	
New Requirements				
Legacy Funds	66.16	(50.16)	16.00	Includes Budget Control Mechanism Mitigation and Interstate Common Line Support adjustments
Modernization Funds	43.84	(39.70)	4.14	Includes A-CAM II True-Up and Uniendo a Puerto Rico Fund/Connect USVI Fund
Total New Requirements	***$110.00***	***($89.86)***	***$20.14***	
Total Program Demand	**$1,357.60**	**(129.49)**	**1,228.11**	
Prior Period Adjustments (difference between projections and actuals):				
Disbursements	0.00	(34.26)	(34.26)	
Billings	6.18	(7.83)	(1.65)	
Interest Income	0.11	(0.12)	(0.01)	
Bad Debt Expense	(13.52)	3.65	(9.87)	
Administrative Expense True-Up	0.00	(6.23)	(6.23)	
Total Prior Period Adjustments	***($7.23)***	***$ (44.79)***	***$(52.02)***	
USAC Admin Expenses	13.58	2.97	16.55	See Table B
Total Funding Requirement	**$1,363.95**	**$(171.31)**	**$1,192.64**	

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The 1Q2020 High Cost Support Mechanism programmatic budget of $16.55 million represents approximately 25% of the 2020 annual High Cost Support Mechanism programmatic budget of $66.59 million.

Table B. 1Q2020 Quarterly Programmatic Budget

(in millions)	**1Q2020 Budget**	**Notes**
Direct Program Costs		
Employee Expenses	$1.64	
Professional Services	2.27	
General & Administrative	0.13	See Note 1
Total Direct Program Costs	**$4.04**	
Direct Assigned Costs		
Employee Expenses	$0.77	
Professional Services	2.94	
General & Administrative	0.00	See Note 1
Total Direct Assigned Costs	**$3.71**	
Total Direct Program & Direct Assigned Costs	**$7.75**	
Common Allocated Costs	**$8.80**	
Total Programmatic Budget	**$16.55**	

Note 1: General & Administrative expenses include High Cost data collection costs.

A comparison of actual expenditures to the budget for the nine months ending September 30, 2019 is provided in **Attachment 2.**

Recommendation:

USAC management recommends that the Committee approve the 1Q2020 budget and projection of demand as proposed.

Recommended High Cost & Low Income Committee Actions:

APPROVAL OF THE FOLLOWING RESOLUTIONS:

   RESOLVED, that the USAC High Cost & Low Income Committee approves a 1st Quarter 2020 High Cost Support Mechanism direct program budget of $7.75 million; and

   RESOLVED FURTHER, that the USAC High Cost & Low Income Committee directs USAC staff to submit a collection requirement of $7.75 million for High Cost Support Mechanism administrative costs in the required November 1, 2019 filing to the FCC on behalf of the Committee; and

   RESOLVED FURTHER, that the USAC High Cost & Low Income Committee, having reviewed at its meeting on October 28, 2019 the 1st Quarter

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2020 High Cost Support Mechanism demand estimate of $1,192.64million, hereby directs USAC staff to proceed with the required November 1, 2019 filing to the FCC on behalf of the Committee. USAC staff may make adjustments if the total variance for the High Cost Support Mechanism is equal to or less than $10 million, or may seek approval from the Committee Chair to make adjustments if the total variance is greater than $10 million, but not more than $15 million.

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ATTACHMENT 1

Detailed High Cost Program Demand

(in millions)	4Q2019	Increase/ (Decrease)	1Q2020	Notes
Steady State – Legacy Funds:				
High Cost Loop Support (HCLS)[3]	$141.31	$(36.33)	$104.98	Provides legacy support to rural carriers in areas where cost to provide service exceeds 115% of the national average cost per line.
Connect America Fund (CAF) Broadband Loop Support (BLS)[4]	259.49	(84.10)	175.39	Replaces legacy fund Interstate Common Line Support. Provides support for voice and broadband only lines to offset interstate access charges.
Frozen Price Cap Carrier Support[5]	30.57	(6.57)	24.00	Price Cap carriers receive support frozen at December 2011 levels. Will be replaced by CAF II and CAF II Auction.
Frozen Competitive ETC Support[6]	118.18	(0.10)	118.08	Competitive carriers receive support frozen at December 2011 levels. Will be replaced by CAF II Auction and/or Mobility Fund Phase II.
Total Steady State Legacy Funds	*$549.55*	*$(127.10)*	*$422.45*	

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[3] High Cost Loop (HCL) support is provided pursuant to 47 C.F.R. §§ 54.1301-.1304 and includes Safety Net Additive Support (SNA) and Safety Valve Support (SVS).

[4] *See Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order, Order and Order on Reconsideration and Further Notice of Proposed Rulemaking, 31 FCC Rcd 3087, 3117-56, paras. 80-185 (2016) (*2016 Rate-of-Return Reform Order*).

[5] *See Connect America Fund et al.,* WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17715, 17725-26, paras. 133, 159 (2011) (*USF/ICC Transformation Order*).

[6] *See USF/ICC Transformation Order,* 26 FCC Rcd at 17715, para. 133.

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(in millions)	4Q2019	Increase/ (Decrease)	1Q2020	Notes
Steady State – Modernization Funds:				
CAF Phase II[7]	379.42	0.00	379.42	Support to Price Cap carriers based on Connect America Cost Model (CACM).
CAF Phase II Auction	37.21	1.49	38.70	Support to auction winners in areas that Price Cap carriers did not accept CAF Phase II model support and in extremely high cost service areas.
CAF Intercarrier Compensation (ICC)[8]	97.77	1.65	99.42	Allows incumbent carriers to charge residential customers an Access Recovery Charge on a limited basis and to recover charges from certain multi-line customers.
Alaska Plan Support[9]	32.08	0.00	32.08	Support for Rate of Return carriers and their wireless affiliates for broadband services Alaska.
Alternative Connect America Cost Model I (A-CAM)[10]	144.25	(1.50)	142.75	Model support to Rate of Return carriers for voice and broadband infrastructure.

[7] *See Connect America Fund et al.*, WC-Docket Nos. 10-90 et al., Report and Order, 29 FCC Rcd 15644 (2014).

[8] *See id.* at 17956, para. 847.

[9] *See Wireless Telecommunications Bureau Approves Performance Plans of the Eight Wireless Providers that Elected to Participate in the Alaska Plan*, WC Docket No. 16-271, Public Notice, 31 FCC Rcd 13317 (WTB 2016); *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139, 10155, paras. 47-49 (2016).

[10] *See Wireline Competition Bureau Authorizes 182 Rate-of-Return Companies To Receive $454 Million Annually in Alternative Connect America Cost Model Support To Expand Rural Broadband*, WC-Docket No. 10-90, Public Notice, 32 FCC Rcd 842 (WCB 2017) (*A-CAM Authorization PN*); *2016 Rate-of-Return Reform Order*, 31 FCC Rcd at 3094-117, paras. 17-79; *Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking, FCC 18-29, para. 68 (rel. Mar. 23, 2018) 83 Fed. Reg. 18951 (May 1, 2018) (*2018 Rate of Return Reform Order*); *A-CAM Authorization PN*; *see also Connect America Fund,* WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13775 (2016) (*A-CAM Revised Offer Order*).

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(in millions)	4Q2019	Increase/ (Decrease)	1Q2020	Notes
Revised A-CAM[11]	16.73	(0.25)	16.48	Additional support to existing A-CAM Rate of Return carriers in exchange for extending broadband service to additional locations.
A-CAM II[12]	43.84	84.58	128.42	Model support to Rate of Return carriers that currently receive legacy support to fund the deployment of voice and broadband-capable networks in their service territories.
Rural Broadband Experiments (RBE)[13]	0.74	(0.03)	0.71	Support to RBE winners in Price Cap areas for experiments for robust broadband infrastructure in rural communities.
Mobility Fund Phase I[14]	23.65	(3.00)	20.65	Support to wireless carriers for the expansion of mobile broadband networks in unserved areas.
Total Steady State Modernization Funds	*$775.69*	*$82.94*	*$858.63*	

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[11] *See Wireline Competition Bureau Announces Offers of Revised A-CAM Support Amounts and Deployment Obligations to Authorized A-CAM Companies to Expand Rural Broadband*, WC Docket No. 10-90, Public Notice, DA 19-115 (WCB 2019).

[12] *See Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration, FCC 18-176, para. 34 (2018) (*December 2018 Rate of Return Reform Order*).

[13] *See Wireline Competition Bureau Announces Entities Provisionally Selected for Rural Broadband Experiments; Sets Deadlines for Submission of Additional Information,* WC Docket No. 10-90, Public Notice, 29 FCC Rcd 14684 (WCB 2014)*; Wireline Competition Bureau Announces Additional Provisionally Selected Bidders for Rural Broadband Experiments and Sets Deadlines for Submission of Additional Information,* WC Docket Nos. 10-90 et al., Public Notice, 30 FCC Rcd 2045 (WCB 2015).

[14] *See Mobility Fund Phase I Support Authorized for 11 Winning Bids Default on 35 Winning Bids Determined*, Public Notice, 31 FCC Rcd 1721 (WTB 2016); *Tribal Mobility Fund Phase I Support Authorized for Final Fifty-One Winning Bids*, Public Notice, 30 FCC Rcd 2226 (WTB 2015).

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(in millions)	4Q2019	Increase/ (Decrease)	1Q2020	Notes
Amounts Paid from Reserve	*(77.64)*	*4.53*	*(73.11)*	Per FCC direction, all disbursements for RBE, Mobility Fund Phase I, and a portion of disbursements for A-CAM I are paid from reserved funds collected in prior years. The ending balance as of June 30, 2019 for reserved funds was approximately $1.5 billion.
New Requirements – Legacy Funds:				
Budget Control Mechanism Mitigation (FCC 18-176)[15]	66.16	(66.16)	0.00	Reimburse carriers for 3Q2018 and 4Q2018 budget control mechanism.
Interstate Common Line Support	0.00	16.00	16.00	Budget Control Mechanism adjustments for September 2016 – December 2016
Total New Requirements Legacy Funds	***$66.16***	***($50.16)***	***$16.00***	
New Requirements – Modernization Funds:				
A-CAM II True-Up (FCC 18-176)[16]	43.84	(43.84)	0.00	Retroactive support to January 2019.
Uniendo a Puerto Rico Fund/Connect USVI Fund	0.00	4.14	4.14	Puerto Rico Fund Support targeted to Puerto Rico carriers to rebuild and improve networks and US Virgin Island Fund Support targeted to Virgin Island carriers to rebuild and improve networks.
Total New Requirements Modernization Funds	***$43.84***	***($39.70)***	***$4.14***	
Total Program Demand	**$1,357.60**	**($129.49)**	**$1,228.11**	

[15] *See December 2018 Rate of Return Reform Order* at para. 83.
[16] *Id*. at para. 58.

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ATTACHMENT 2

High Cost Administrative Costs and Headcount
Comparison of Actual Expenditures and Headcount to the Budget for the
Nine Months Ending September 30, 2019

($ in millions)	FTE Actual	FTE Budget	FTE Variance	YTD Actual	YTD Budget	Variance
Direct Program Costs						
Employee Expenses	33	38	5	$3.56	$4.30	$0.74
Professional Services (Note 2)				0.44	2.64	2.20
General & Administrative (Note 3)				0.26	0.36	0.10
Total Direct Program Costs				**$4.26**	**$7.30**	**$3.04**
Direct Assigned Costs						
Employee Expenses	17	18	1	$2.07	$2.28	$0.21
Professional Services (Note 2)				3.56	7.33	3.77
General & Administrative (Note 3)				0.00	0.00	0.00
Total Direct Assigned Costs				**5.63**	**$9.61**	**$3.98**
Total Direct Program & Direct Assigned Costs	**50**	**56**	**6**	**$9.89**	**$16.91**	**$7.02**
Common Allocated Costs (Note 4)				**$20.83**	**$25.76**	**$4.93**
Total Programmatic Budget				**$30.72**	**$42.67**	**$11.95**

Note 2: Direct Program Professional Services include support for program modernization orders and functional requirements gathering for High Cost system modernization. Direct Assigned Professional Services include beneficiary & contributor audit program audits and IT contract labor.

Note 3: General & Administrative expenses include High Cost data collection costs.

Note 4: Common costs include costs not directly attributable to a program and are allocated based on the Cost Allocation Methodology, which allocates costs based 50% on direct program costs in the prior year and 50% on program demand in the prior year.

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High Cost Business Update

High Cost & Low Income Committee

October 28, 2019

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Agenda: High Cost

Topic	Description	Purpose	Presenter	Length
Business Update				
Recap	Review of action items and status from previous HCLI Committee Meeting	Informational	Vic	---
High Cost Program at a Glance	Overview of High Cost Activities for 2019	Informational	Vic	5 Min
Discussion Topic 1	High Cost Order Update	Informational	Vic	5 Min
Discussion Topic 2	Overview of CAF Auction II and Eligible Locations Adjustment Process (ELAP)	Informational	Vic	10 Min
Discussion Topic 3	Digital Opportunity Data Collection (DODC)	Informational	Sammy	10 Min
Appendix A	High Cost Glossary of Acronyms	Informational	-	-
Appendix B	FCC Docket Monitoring 2019	Informational	-	-
Appendix C	2019 3rd Quarter Accomplishments, Planned Activities and Metrics	Informational	-	-

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July Board Recap

Action items and updates from previous HCLI Committee meetings

Topic	Requests	Status
N/A	No Actions Required for this period	

High Cost Program at a Glance

Milestone Legend

3 Completed
2 On Track
1 At Risk

2019	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC

New Orders

Rate of Return	Rate of Return Implementation
CAF Auction- USVI/PR	CAF 2 Auction 1st Payments **3** / Planning and Discovery
(DRAFT)RDOF	Planning and Discovery
DODC	Planning and Discovery / Requirements

New Procurements

Risk Assessment	
HCLI Requirements	**3** Final PMO SOW (Both)
CostQuest	PMO Vendor Selected **2**
DODC	Vendor Selec.

Public Interest Obligations

Complete verification tool kits and sampling plans **3**   Complete RBE sampling plan **2**

CAF Verifications	RBE Verifications / CAF II and ACS Verifications / RBE Verifications
Performance Measures	Phase 2 Requirements Analysis / Phase 2 System Development

HC Forms

Form 481 & Form 690	2019 Annual Form Updates / 2019 481 & 690 Filing Period / 2019 54.314 Filing Period / 2020 Annual Forms Updates
	Launch Form 481 **3** Forms 481 & 690 Filing Deadline **3** **3** Publish 481 State Data **2** Form 54.314 Filing Deadline
54.314	Publish 481 Open Data **3**

Data Collection

HUBB	Perf. Improv. Edit Phase 1 Bulk Delete Edit Phase 2 Record Lock & Flag Compliance Gap
HUBB	HUBB Filing Deadline **3** Refactoring New Funds
(On Hold) MF II	Final Maps

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Note: Refer to Appendix C for 3rd quarter accomplishments, planned activities and metrics.

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High Cost Order Updates (Post July Meeting) - 2019

FCC Released Items - Yearly
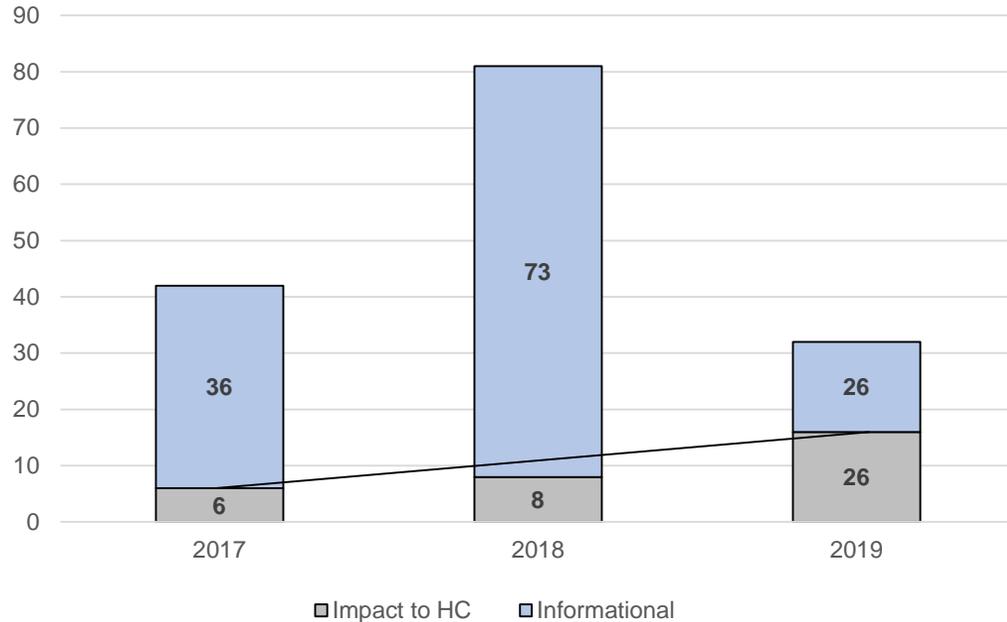
FCC Released Items and the Impact to HC since July 2019
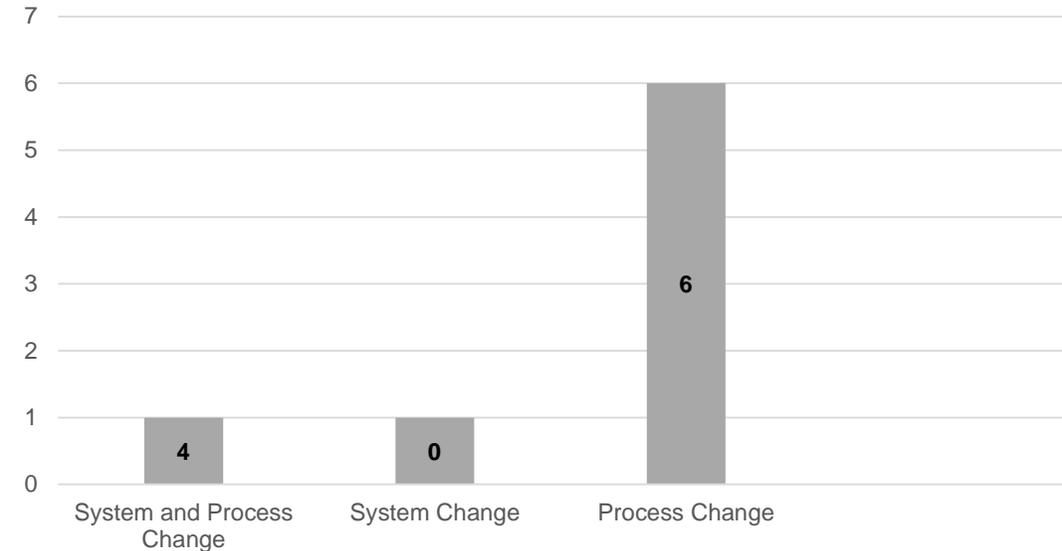
- ❖ Significant increase in FCC releases that impact HC systems and processes

- ❖ 3 - Major New Significant Orders: RDOF, DODC, and US Virgin Island/Puerto Rico (US VI/PR)

- ❖ 1 - PN Announcing the delay in Initiation of the CAF Phase II Auction Eligible Locations Adjustment Process (ELAP)

- ❖ 6 - (5 Ready to Authorize/ Authorize Support Public Notices for CAF II Auction and 1 PN for ACAM II)

About the CAF II Auction Project

- <u>Auction Highlights</u>
  - Auction 903 was a Reverse Auction
    - Used a forward looking cost model (CACM) to determine support
    - 103 winning bidders: 700,000+ locations in 45 states
  - The FCC initially committed $1.98 billion (10 year term)
    - $1.488 billion in support awarded via the auction
  - Eligible locations: Census blocks lacking 10/1 Mbps service from any provider, with some exceptions
  - Over 99.7% of eligible locations will receive at least 25/3 Mbps downstream speeds
  - More than half of the eligible locations will receive at least 100/20 Mbps service.

- <u>Provider Eligibility/Application Process</u>
  - ETC Designation required
  - Pre-auction: short-form application with basic information
  - Winning Bidders Required to submit Long-Form Application
    - certifying that they are technically/financially qualified to provide service
  - Post FCC Long-Form review, winning bidders required to submit LOC/OOC

- <u>Obligations</u>
  - Network build-out requirements: 40% by year 3, 60% by year 4, 80% by year 5, 100% by year 6
  - Technology-neutral performance tiers with varying levels of speed, low/high latency requirement, and usage allowance
  - Required deployment to at least 95% of funded locations in each state where they are receiving support
  - Annual progress reports required to monitor the progress of deployment
  - Fund recipients:
    - Certify that they have met their interim service milestones, public interest obligations, and network performance requirements.
    - Are subject to compliance reporting and late filing penalties if performance falls short of commitments

CAF II Auction LOC Pipeline - Snapshot as of 9/20

CAF II Auction LOC Pipeline Chart

- Approved
- Being Cleared
- Anticipated RTA
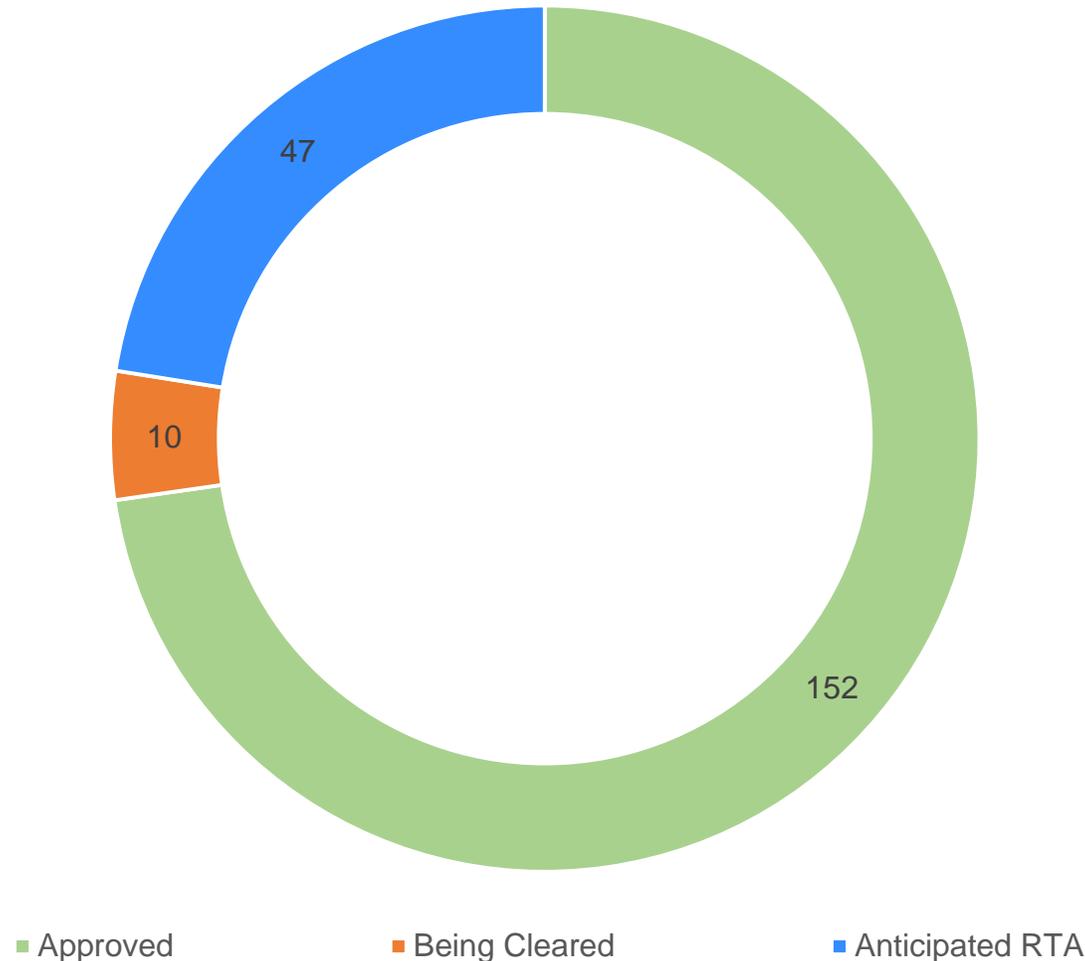
Definitions:

Approved: USAC-approved LOC and OOC; FCC has or will authorize disbursements (152)

Being Cleared: LOC/OOC received and under review by USAC's OGC (10)

Anticipated: FCC to issue Ready to Authorize (RTA) Public Notice(s) (47)

Key Metrics:

- ✓ 94% of received LOC/OOCs are approved (152/162)
- ✓ 162 LOCs represents six batches + NY Auction
- ✓ $970M of $1.48B support related to the 152 approved LOCs
- ✓ Represents 322K of 700K approved locations
- ✓ Represents 41 out of the total 45 states

Eligible Locations Adjustment Process (ELAP)

- The Process to adjust the deployment obligations and support of authorized auction winners when the total number of actual locations in eligible areas is less than the number of funded locations

- Process delayed (*See* DA 19-784, August 19, 2019 Public Notice)

- Fund recipients will be required to provide evidence to support adjustments

- Stakeholders will allowed to challenge fund recipient's revisions

Digital Opportunity Data Collection (DODC)

In the Report and Order, the FCC directs:

- USAC to establish the Digital Opportunity Data Collection—a new data collection that will collect geospatial broadband coverage maps from Internet service providers, specifically aimed at advancing the Commission's universal service goals;

- USAC and Office of Economics and Analytics (OEA) to create a process to collect public input, commonly known as "crowdsourcing"
  - To challenge the accuracy of providers-provided broadband maps; and

- WCB to make targeted changes to the existing Form 477 data collection
  - to reduce reporting burdens for all filers and modify the collection to incorporate new technologies.

In the Second Further Notice of Proposed Rulemaking, the FCC seeks comment on:

- Additional technical standards for fixed broadband providers that could ensure greater precision for the Digital Opportunity Data Collection deployment reporting;

- Ways the Commission can incorporate location-specific fixed broadband deployment data in this new data collection;

- Incorporating the collection of accurate, reliable mobile wireless voice and broadband coverage data into the Digital Opportunity Data Collection;

- Sunsetting the Form 477 broadband deployment collection following the creation of the Digital Opportunity Data Collection.

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Digital Opportunity Data Collection Implementation Approach

- Obtain a 3rd party to support DODC implementation

- Explore strategies to obtain early feedback/input from DODC filers and other users

- Establish governance structure between FCC and USAC

- Secure program budget for PMO contract

- Adopt a phased approach:
    - Phase 1 – Broadband Portal,
    - Phase 2 – Crowdsourcing Portal,
    - Phase 3 – Explore using existing USAC call center for service desk,
    - Phase 4 – Verifications, etc.

- Consider sourcing strategy for system development

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Appendix A: Glossary of Acronyms

Term	Definition
ACAM	Alternative Connect America Model; provides support to rate-of-return carriers that voluntarily elected to transition to a new cost model for calculating High Cost funding. ACAM models forward-looking economic costs of deploying and operating a fiber-to-the-premise (FTTP) network. Revised ACAM and ACAM II are related support offers.
CAF BLS	Connect America Fund Broadband Loop Support.
CAF I	Connect America Fund Phase I. CAF II, CAF Phase II Auction and Rural Digital Opportunities Fund (RDOF) are related support programs.
CAP	Connect America Portal; system used to manage and track some workflows associated with High Cost operational processes.
DODC	Digital Opportunity Data Collection
ELAP	Eligible Locations Adjustment Process (ELAP)
ETC	Eligible Telecommunication Carrier.
HCLI	High Cost Low Income; system used to calculate monthly High Cost payments to carriers, maintain carrier information and provide operational reports.
HUBB	High Cost Broadband Portal; system used to collect location data, track progress toward obligations/milestones, and collect annual certifications of deployments for CAF-support programs.
IDVs	In-Depth Validations.
LOC	Letter of Credit

Appendix A: Glossary of Acronyms (cont'd)

Term	Definition
MF I	Mobility Fund Phase I. MFII is a pending, related program.
NECA	National Exchange Carrier Association
OMD	Office of Managing Director. OMD is the office within the FCC that administers and manages the Commission.
PMM	Performance Measurement Module. Collection of system functionality designed to deliver the requirements of the Performance Measurement Order.
PR / USVI	Puerto Rico / US Virgin Islands. Related to FCC Orders to assist in the rebuilding of the islands affected by recent hurricanes.
RBE	Rural Broadband Experiments.
RoR	Rate of Return.
SAC	Study Area Code.
US Telecom	Trade association that represents telecommunications related businesses in the US.
WCB	Wireline Competition Bureau. The Wireline Competition Bureau works to ensure that all Americans have access to robust, affordable broadband and voice services. Its programs help ensure access to affordable communications for schools, libraries, health care providers, and rural and low-income consumers.
WTA	Western Telecom Alliance

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Appendix B: All FCC Docket Monitoring - 2019

FCC Order/ Mandate	Release Date	Description	Impact to High Cost
DA 19 -685	July 22, 2019	CONNECT AMERICA FUND PHASE II AUCTION SUPPORT FOR 1,122 WINNING BIDS READY TO BE AUTHORIZED	Process
DA 19 -702	July 25, 2019	New Lisbon Denial Order: WCB concludes that USAC properly sought recovery of high-cost support provided to New Lisbon based on the company's failure to comply with the Commission's rules.	Informational
DA 19 -722	July 30, 2019	Wireline Competition Bureau Seeks Comment on NTCA Petition for waiver	Informational
FCC 19-77	August 2, 2019	FCC Proposes $20.4 Billion Rural Digital Opportunity Fund (RDOF)	Process and Systems
FCC 19-79	August 6, 2019	FCC Improves Broadband Mapping Digital Opportunity Data Collection (DODC)	Process and Systems
DA 19-745	August 6, 2019	Sunset Digital Communications, Inc. Waiver Order: Wireline Competition Bureau, in conjunction with the Rural Broadband Auctions Task Force and the Office of Economics and Analytics, grants the petition of Sunset Digital Communications, Inc. requesting waiver of the Commission's rules to allow it to make a major modification to its long-form application.	Informational
DA 19-763	August 9, 2019	LTD Broadband Waiver Order: WCB, in conjunction with the RBATF and OEA, grants LTD Broadband LLC's petition for waiver of the February 25, 2019 deadline for filing audited financial statements for the Connect America Fund Phase II auction (Auction 903).	Informational
DA 19-769	August 12 2019	CONNECT AMERICA FUND PHASE II AUCTION SUPPORT AUTHORIZED FOR 593 WINNING BIDS	Process
DA 19 -770	August 12,2019	CONNECT AMERICA FUND PHASE II SUPPORT AUTHORIZED FOR Three NEW YORK WINNING Bidders	Process
DA 19-773	August 13,2019	Sunset Digital Order: ETC designation is conditioned upon and limited to SDC LLC's authorization to receive CAF II auction support and effective only upon such authorization.	Informational
DA 19-784	August 19,2019	CAF Phase II Auction Eligible Locations Adjustment Process (ELAP) Public Notice: WCB delays the filing deadline for the CAF II Auction eligible locations adjustment process until further notice.	Process and Systems

Impact on High Cost: (1) Systems Change   (2) Process Change   (3) Informational

Appendix B: All FCC Docket Monitoring - 2019 (Cont'd)

FCC Order/ Mandate	Release Date	Description	Impact to High Cost
DA 19-786	August 21,2019	Hood Canal Communications and CenturyLink Public Notice: WCB seeks comment on a joint Study Area Waiver of Hood Canal Communications and CenturyLink for waiver of the definition of study area.	Informational
DA 19-808	August 22,2019	WCB Authorizes 171 RoR Companies to Receive $491M Annually in A-CAM II Public Notice: Collectively, authorized companies are committing to provide at least 25/3 Mbps service to over 363,000 locations, including over 37,000 locations on Tribal lands.	Process
DA 19-825	August 26,2019	CAF Phase II Auction Support for 375 Bids Ready for Authorization Public Notice: CAF Fund Phase II auction (Auction 903) support for some Auction 903 winning bids identified.	Process
DA 19-851	August 30,2019	NECA 2020 Proposed HCLS formula Public Notice: WCB seeks comment on NECA 2020 Modification of the Average Schedule Company Universal Service High Cost Loop Support Formula.	Informational
DA 19-906	September 12, 2019	Connect America Fund Phase II Auction Support Authorized for 1,031 Winning Bids Public Notice: WCB in conjunction with the Rural Broadband Auctions Task Force and the Office of Economics and Analytics, authorize $112,183,454.30 in CAF II support for the winning bids identified in Attachment A of this Public Notice.	Process
DA 19-911	September 12, 2019	Reconsideration of Satellite Related Performance Measures Order: FCC Adopts an Order on Reconsideration of Satellite Related Performance Measures.	Informational
DA 19-917	September 16, 2019	Florida Public Service Commission Waiver Order: Wireline Competition Bureau grants a brief, limited waiver of the filing deadline for the Florida Public Service Commission (FPSC) to certify eligible telecommunications carriers (ETCs) pursuant to section 54.314(d)(1) of the Commission's rules.	Informational
DA 19-925	September 18, 2019	Viasat ETC Order: Carrier's ETC Designation is conditioned upon and limited to Viasat's authorization to receive Connect America support awarded through the Connect America Fund Phase II auction (Auction 903) and effective only upon such authorization.	Informational
FCC-19-95	September 30, 2019	The Uniendo a Puerto Rico Fund and the Connect USVI Fund Allocates more than $500 million over ten years in fixed broadband support and more than $250 million over three years in mobile broadband support for Stage 2 of the Uniendo a Puerto Rico Fund; allocates more than $180 million over ten years and $4 million over three years for Stage 2 Connect USVI Fund fixed and mobile support, respectively.	Process and Systems

Impact in High Cost: (1) System Change   (2) Process Change   (3) Informational

Universal Service Administrative Company
High Cost & Low Income Committee Meeting

INFORMATION ITEM

Appendix C
High Cost Business Update
Q3 2019 Update on High Cost Administration

Overall Summary from Q3 2019

In the second half of 2019, the High Cost Program (High Cost or Program) remains focused on the FCC's implementation of the Connect America Fund (CAF) programs. The operations team continues to disburse support for all of the program funds.

High Cost continues to implement the *December 2018 Rate of Return Order*, in which the FCC took action to encourage more carriers to seek model-based support, instead of legacy, cost-based support. In the order, the FCC (1) made a revised offer to carriers that had previously elected (Alternative Connect America Cost Model) ACAM support, (2) established a new ACAM II fund open to carriers that had stayed with Connect America Fund Broadband Loop Support (CAF-BLS) support, and (3) adopted a new budget and new deployment obligations for carriers that continued to receive CAF-BLS.

High Cost is implementing the price cap CAF Phase II Auction program, which awards support to carriers that deliver service in areas where the incumbent carrier declined CAF II model support or in extremely high-cost areas.

High Cost is preparing for Stage 2 of the Uniendo a Puerto Rico Fund and the Connect United States (USVI) Fund, as well as the Rural Digital Opportunity Fund (RDOF). In the Stage 2 of the Puerto Rico/USVI funds, the FCC will invest roughly $934 million in advanced fixed and mobile networks designed to withstand future storms in Puerto Rico and the Virgin Islands. With RDOF, the FCC will allocate more than $20 billion to expand broadband in unserved rural areas.

Systems. High Cost is implementing new High Cost Broadband Portal (HUBB) functionality to let carriers edit and/or delete certified deployment data on a bulk basis. High Cost also continues to develop a new system to implement the *Performance Measures Order*, which will require carriers to conduct speed and latency testing of CAF-funded networks and report the results to USAC. Program recently launched the first phase of the Performance Measures Module (PMM) that will allow carriers to identify which HUBB-certified locations have active subscribers, for testing purposes, and select a random sample for testing. Program continues to work on the second phase of the system, which will collect the actual speed and latency test data. In addition, High Cost is preparing to develop a system to support the new Eligible Locations Adjustment Process (ELAP), which will let CAF II Auction winners submit evidence to adjust deployment obligations when the total number of actual locations in eligible areas is less than the number of funded locations.

Compliance Team. The Compliance Team completed test work to verify CAF fund recipients' deployment, using random samples of locations reported in the HUBB (as of the March 2019 filing deadline). Fund recipients had the following milestone obligations: CAF II - 60 percent deployment milestone as of the end of 2019 and Alaska Communications System (ACS) – the 30 percent deployment milestone. The team continues its Rural Broadband Experiments (RBE) verification reviews.

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New Team. High Cost is assembling a team to implement the Digital Opportunity Data Collection (DODC), a new broadband mapping initiative that will collect granular deployment data from carriers in order to better target USF support in unserved areas.

High Cost Program Q3 Updates & Accomplishments

- Began disbursing ACAM II support as of the end of September.
- Launched PMM Phase 1, which enables carriers to report which locations certified in the HUBB have active subscribers for testing purposes and selects a random sample of those locations for speed and latency testing.
- Implemented HUBB functionality allowing carriers to bulk edit and/or delete certified deployment data.
- Completed verification test work for all 12 CAF Phase II holding companies and ACS.
- Completed sampling plan for upcoming RBE verification work and announced reviews of four new RBE carriers comprising 17 Study Area Codes (SACs).
- Finalized new Rate of Return (RoR) webpage and new fund pages for ACAM, Revised ACAM, ACAM II and CAF-BLS (all to go live with upcoming launch of new USAC website).
- Provided state and tribal access to Form 481 data filed by carriers as of July and reached out to state utility commissions (and carriers that self-certify) about annual 54.314 certification of eligible telecommunications carriers (ETCs) ahead of October 1 deadline.

High Cost Program Q4 Planned Activities

- Finalize CAF II verification review closure letters, draft CAF II and ACS verification review project closures reports for FCC, and provide verification results to Ops Team and FCC to support implementation of compliance gap process and penalties.
- Enhance Alaska Plan middle mile reporting capabilities.
- Add new modernized funds - CAF II Auction, Revised ACAM and ACAM II to the HUBB.
- Conduct PMM Phase I user testing with the stakeholder advisory group of seven "early adopters" carrier.
- Continue PMM Phase 2 development.
- Conduct in-depth validations (IDVs) of Form 481 data filed by carriers as of July 2019 deadline.
- Publish non-confidential Form 481 data to USAC's website.
- Gearing up for outreach to help carriers navigate annual HUBB filing window (March 1 filing deadline) with updated training materials (user guide, FAQ, etc.), outreach activities (webinar, email reminders, NECA Expo presentation, etc.), as well as customer service and IT support to answer carrier questions and troubleshoot problems.
- Host webinar about Letter of Credit (LOC) and Opinion of Counsel (OCC).
- Deliver High Cost presentation at NECA Expo.
- Add more resources/guidance to the High Cost website to help carriers better understand and prepare for the verification process:
    - share lessons learned from the 2018 CAF II 40 percent milestone verification work,
    - include information about acceptable documentation that carriers may submit to prove deployment reported to the HUBB.

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Program Metrics

	Metric	Target	Q1	Q2	Q3	Variance	Description/mitigation
1	Wireless Road miles build out	63,698	49,140	49,140	49,140	14,558	Target Completion August 2020
2	Wireless Tribal population build out	56,932	42,225	42,225	42,225	14,707	On track with verifications, disbursements occurred in 4Q2018.
3	Wireline Locations validated (CAFII)	100%	100.0%	100.0%	100.0%	0.0%	
4	Wireline Locations Verified (CAFI)	100%				0.0%	CAF I waiver work complete and letters delivered to FCC.
	Wireline Locations Verified (CAF II)	100%	100%	0%	61%	39%	39% (one carrier) under second level review.
5	Disbursements completed ($M) (average for quarter)	1,211	1,142	1,333	817	-122.0	Target based on Q3 projections. Disbursements included PPAs not included in forecast. Actuals based on cash flow months.
6	Disbursement cycle time	19 Days	18 Days	17 Days	19 Days	0	Monthly cycle time disbursement
7	IT Systems availability (%)	99%	100%	100%	100%	1.0%	Availability of HUBB, CAP and HCLI systems.
8	Appeals	N/A	9	3	1	N/A	One appeal of audit findings received on 8/1/2019.
9	Call Ctre Abandon Rate (average for quarter)	3%	1%	2%	0%	3%	No calls were abandoned in August.

Q3 disbursements do not include September as still pending.

Key – All items are on track

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Universal Service Administrative Company
High Cost & Low Income Committee Meeting

ACTION ITEM

Approval of Low Income Support Mechanism
1st Quarter 2020 Programmatic Budget and
Demand Projection for the November 1, 2019 FCC Filing

Action Requested:

The High Cost & Low Income Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the 1st Quarter 2020 (1Q2020) programmatic budget and demand projection for the Low Income Support Mechanism for submission to the Federal Communications Commission (FCC) in USAC's November 1, 2019 quarterly filing.

Discussion:

On a quarterly basis, USAC is required to submit to the FCC each program's budget[1] and projected demand for the upcoming quarter.[2]

Funding Requirement

Based on projected subscribership levels, USAC estimates the 1Q2020 funding requirement for the Low Income Support Mechanism as follows:

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[1] *See* 47 C.F.R. § 54.715(c).
[2] *See* 47 C.F.R. § 54.709(a)(3).

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Table A. Program Funding Requirement

(in millions)	4Q2019	Increase/ (Decrease)	1Q2020	Notes
Steady State:				
Lifeline	$253.55	$(49.18)	$204.37	See Note 1
Link Up	0.04	0.02	0.06	
New Requirements:				
N/A	0.00	0.00	0.00	
Total Program Demand	**$253.59**	**$(49.16)**	**$204.43**	
Prior Period Adjustments (difference between projections and actuals):				
Disbursements	(19.10)	(15.14)	(34.24)	
Billings	1.73	(1.19)	0.54	
Interest Income	(0.03)	0.00	(0.03)	
Bad Debt Expense	(3.22)	0.69	(2.53)	
Administrative Expense True-Up	0.00	(10.14)	(10.14)	
Total Prior Period Adjustments	*$(20.62)*	*($25.78)*	*$(46.40)*	
USAC Administrative Expenses	17.28	(0.22)	17.06	See Table B
Total Funding Requirement	**$250.25**	**$(75.16)**	**$175.09**	

Note 1: Demand decrease due to decline in subscribership and projected phase-down in support for voice only service.

The 1Q2020 Low Income Support Mechanism programmatic budget of $17.06 million represents approximately 25% of the 2019 annual Low Income Support Mechanism programmatic budget of $69.44 million.

Table B. 1Q2020 Quarterly Programmatic Budget

(in millions)	1Q2020 Budget	Notes
Direct Program Costs		
Employee Expenses	$2.10	
Professional Services	5.24	
General & Administrative	0.52	See Note 2
Total Direct Program Costs	**$7.86**	
Direct Assigned Costs		
Employee Expenses	$0.91	
Professional Services	3.10	
General & Administrative	0.22	See Note 2
Total Direct Assigned Costs	**$4.23**	
Total Direct Program & Direct Assigned Costs	**$12.09**	
Common Allocated Costs	**$4.97**	
Total Programmatic Budget	**$17.06**	

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Note 2: General & Administrative expenses include computer support & maintenance, postage, and meetings & conferences.

A comparison of actual expenditures to the budget for the nine months ending September 30, 2019 is provided in **Attachment 1.**

Recommendation:

USAC management recommends that the Committee approve the 1Q2020 budget and projection of demand as proposed.

Recommended High Cost & Low Income Committee Actions:

APPROVAL OF THE FOLLOWING RESOLUTIONS:

> **RESOLVED,** that the USAC High Cost & Low Income Committee approves a 1st Quarter 2020 Low Income Support Mechanism direct program budget of $12.09 million; and

> **RESOLVED FURTHER**, that the USAC High Cost & Low Income Committee directs USAC staff to submit a collection requirement of $12.09 million for Low Income Support Mechanism administrative costs in the required November 1, 2019 filing to the FCC on behalf of the Committee; and

> **RESOLVED FURTHER,** that the USAC High Cost & Low Income Committee, having reviewed at its meeting on October 28, 2019 the 1st Quarter 2020 Low Income Support Mechanism demand estimate of $175.09 million, hereby directs USAC staff to proceed with the required November 1, 2019 filing to the FCC on behalf of the Committee. USAC staff may make adjustments if the total variance for the Low Income Support Mechanism is equal to or less than $10 million, or may seek approval from the Committee Chair to make adjustments if the total variance is greater than $10 million, but not more than $15 million.

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ATTACHMENT 1

Low Income Administrative Costs and Headcount
Comparison of Actual Expenditures and Headcount to the Budget for the
Nine Months Ending September 30, 2019

($ in millions)	FTE Actual	FTE Budget	FTE Variance	YTD Actual	YTD Budget	Variance
Direct Program Costs						
Employee Expenses	48	48	0	$4.10	$5.23	$1.13
Professional Services (Note 3)				7.39	14.16	6.77
General & Administrative (Note 4)				0.32	2.11	1.79
Total Direct Program Costs				**$11.81**	**$21.50**	**$9.69**
Direct Assigned Costs						
Employee Expenses	19	22	3	$2.68	$2.80	$0.12
Professional Services (Note 3)				9.51	9.24	(0.27)
General & Administrative (Note 4)				0.79	1.16	0.37
Total Direct Assigned Costs				**$12.98**	**$13.20**	**$0.22**
Total Direct Program & Direct Assigned Costs	**67**	**70**	**3**	**$24.79**	**$34.70**	**$9.91**
Common Allocated Costs (Note 5)				**$10.06**	**$12.27**	**$2.21**
Total Programmatic Budget				**$34.85**	**$46.97**	**$12.12**

Note 3: Direct Program Professional Services include Lifeline eligibility verifications. Direct Assigned Professional Services include National Verifier (NV) software development, NV operations & maintenance, beneficiary & contributor audit program audits, and IT contract labor.

Note 4: General & Administrative expenses include computer support & maintenance, printing & postage, and hardware & equipment.

Note 5: Common costs include costs not directly attributable to a program and are allocated based on the Cost Allocation Methodology, which allocates costs based 50% on direct program costs in the prior year and 50% on program demand in the prior year.

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Lifeline Business Update

High Cost Low Income Committee
October 28, 2019
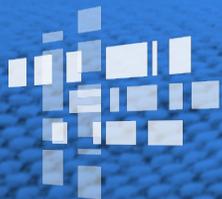
Universal Service
Administrative Co.

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Agenda: Lifeline

Topic	Description	Purpose	Presenter	Length
Recap	Review of action items and status from previous HCLI Committee meeting	Informational	Michelle	2 min
Discussion Topic	National Verifier (NV)	Informational	Michelle	18 min
Lifeline Program at a Glance	Overview of Lifeline activities for next 12 months	Informational	Michelle	5 min
Appendix A	Glossary of Acronyms and Projects	Informational	-	-
Appendix B	Q3 2019 Accomplishments, Q4 Planned Activities, and Metrics	Informational	-	-

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July Board Recap

Action items and updates from previous HCLI Committee meetings

Activity	Status	Due Date	Owner
Updates on Carrier API.	Content provided in this slide deck.	10/29	Lifeline
Updates on CMS.	Content provided in this slide deck.	10/29	Lifeline
Common documentation mistakes.	Content provided in this slide deck.	10/29	Lifeline

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National Verifier: Implementation Update

**It's been a tremendous past few months for National Verifier progress!**

- On September 9th, a second Lifeline Support Center location opened, increasing capacity as the NV scales up.
- On September 17th, USAC launched the CMS connection, providing a real-time nationwide Medicaid check in all states.
- On September 19th and October 23rd, USAC added NV Carrier API functionality to the pre-production environment for carrier testing.
- On October 11, Alabama, Arkansas, Louisiana, Massachusetts, Maryland, New Jersey, Oklahoma, Puerto Rico, South Carolina, and Washington were soft launched.
- On **October 11, SC, VA, and** WA state CMA's were posted in the federal register.
- On October 23, Arizona, Connecticut, Georgia, Iowa, Kansas, Nebraska, Nevada, New York, Vermont, Virginia, and West Virginia were hard launched.

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National Verifier: Status of Applications

- USAC has received nearly 660k applications through the National Verifier through September 30th, 356k of which were in Q3.
- Applications received in 2Q2019 have had time to be fully processed[1,] and the results are shown below.
- Please note, the CMS connection was launched on September 17th. The charts below reflects data prior to the CMS connection.
- 73% of the qualified consumers below enrolled, or were already enrolled, in NLAD.
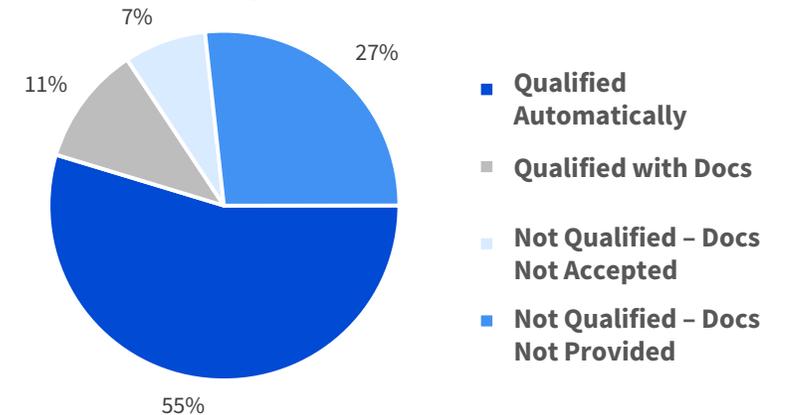
Q2 Eligibility Status Result
Income or participation in qualifying programs
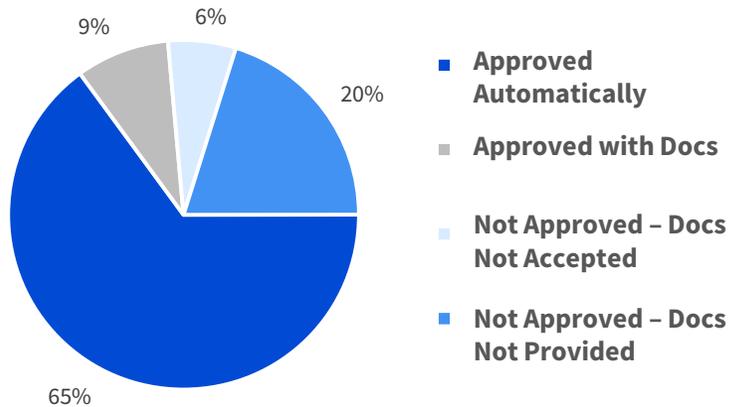
Approved Automatically	65%
Approved with Documentation	9%
Not Approved – Documentation not Accepted	6%
Not Approved – Documentation not Provided	20%

Q2 Overall Qualification Result
Including NLAD validations

Qualified Automatically	55%
Qualified with Documentation	11%
Not Qualified – Documentation not Accepted	7%
Not Qualified – Documentation not Provided	27%

1- Fully Processed means that the window to provide any supporting documentation has closed and if qualified, there has been a 90 day opportunity to enroll.

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National Verifier: Impact of CMS Connection in Hard Launched States

The CMS connection has greatly improved automated eligibility pass rates, streamlining the application process by reducing the need to collect documentation from applicants.

- Prior to CMS, states and territories without connections to state databases were experiencing an average of a 6% automated pass rate through the connection to the Department of Housing and Urban Development (HUD).
  - With the launch of CMS, we are currently seeing an average of a 64% automated pass rate.
  - In some states, such as Alaska, Delaware, and the District of Columbia it is 70% or higher.
- Prior to CMS, states and territories with connections to state databases and HUD were experiencing an average of a 71% automated pass rate.
  - With the launch of CMS, we are currently seeing a 78% automated pass rate.
  - While a more modest increase given the existing benefit of state databases, the CMS connection helps in states that have a SNAP-only connection.

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National Verifier: Common Documentation Mistakes

Here are the common mistakes made by consumers when submitting documentation to prove eligibility.

Screenshots of Documentation
- Consumers will take a screenshot of a benefit letter or another type of documentation but fail to include the full document.
- USAC cannot approve documentation unless it includes all of the required information.

SSI Documentation
- USAC accepts Social Security Administration (SSA) benefit documentation as proof of income, but SSA benefit documentation cannot be used to show participation in Supplemental Security Income (SSI) if it's not specific to SSI.
- If the consumer selects SSI but submitted an SSA document and did not provide the number of members in their household, USAC cannot approve the document.

SNAP and Medicaid Documentation
- SNAP and Medicaid cards are often rejected because they do not contain all the required information such as expiration dates.

USAC accepts other documentation for these programs. USAC publishes guidelines for acceptable documentation.

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National Verifier: Automated State Database Update

Launched - 48 states/territories

- With automated state databases
  - **21%** of Lifeline subscribership
  - CO, IA, IN, KY, MI, MO, MS, NC, NM, PA, TN, UT

- Potential to implement connection in 2019
  - **8%** of Lifeline subscribership
  - GA, SC, VA, WA

- Discussions in progress for potential 2020 connection
  - **30%** of Lifeline subscribership
  - AL, AK, AR, AZ, CT, KS, LA, MA, ME, NE, NJ, NV, NY, OK, PR, VI, VT, WV, WY

- State has not shown interest in a connection
  - **3%** of Lifeline subscribership
  - AS, DC, DE, GU, HI, ID, MD, MP, MT, NH, ND, SD, RI

Future Launches – 8 states

- Discussions in progress for potential 2020 connection
  - **38%** of Lifeline subscribership
  - CA, FL, IL, MN, OH, OR, TX, WI

> **All states will be launched by the end of 2019.**
> - USAC continues to work towards a connection with interested states, even if the state has already launched.
> - States without a signed Computer Matching Agreement at this time will be unable to implement an automated connection by the end of the year.

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Lifeline Program at a Glance

	2019 Today		2020								
	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEPT

Milestone Legend
- **3** Completed
- **2** On Track
- **1** At Risk

See Appendix B for 3rd quarter accomplishments, planned activities, and metrics.

Program Integrity
Sampling/Review of Oversubscribed Address /Potentially Ineligible Subscribers /Deceased Subscribers / Phantom Subscribers *
These will occur quarterly.

Lifeline System Updates
- Form 555 Updates — **2** Update implemented
- Voice Phase Down — **2** Voice phase down implemented
- NLAD Performance Enhancements — **2** NLAD performance enhancements implemented

Business Intelligence/ Open Data
- Development of Data Warehouse — **2** Datawarehouse for Lifeline implemented
- Open Data / Disbursement Data — **2** Open data / disbursement data completed
- RAD, NLAD, and NV Real-Time Notification Automation — **2** Real-time notification automation implemented

Representative Accountability Database (RAD)
- RAD Implementation — **2** RAD implementation details are pending further coordination with the FCC

National Verifier
- Continued State Connection Negotiation and Development - deployed as ready
- **2** Carrier eligibility, status check, certification consent, and document upload redirect API implemented and all states launched

Q3 Milestones Completed but not shown:
- CMS connection launched to NV (September 2019)
- ServiceNow Upgrade (September 2019)

Note: the milestone dates shown here are projected dates and may be subject to change

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Appendix A: Glossary of Acronyms and Projects

Term	Definition
BPO	Business Process Outsourcing to handle call center and manual application reviews for the Lifeline program.
CMS	Centers for Medicare and Medicaid Services, federal administrator of Medicare and Medicaid benefits.
CMA	Computer Matching Agreement, the computerized comparison of records for the purpose of establishing or verifying eligibility for a federal benefit program.
DIB	Data Integrity Board, the body within a federal agency that approves and oversees Computer Matching Agreements.
Forensic Audit	The Chairman of the Senate Committee on Homeland Security and Governmental Affairs requested on September 15, 2017 that USAC and the FCC perform forensic audits of the top 30 eligible telecommunication carriers. This request followed the GAO's 2017 Audit Report. The FCC directed USAC to audit the top 30 Study Area Codes (SACS), which spanned across eight carriers.
National Verifier (NV)	A framework of systems and processes for which roll out is in progress that will conduct eligibility determinations and other functions necessary to enroll subscribers into the Lifeline program, transferring the responsibility from ETCs.
NLAD	National Lifeline Accountability Database, an existing system that allows service providers (SPs) to check on a real time, nationwide basis whether a consumer is already receiving a Lifeline Program-supported service, and to maintain records of Lifeline subscribers.
RAD	Representative Accountability Database, which is being developed to register and monitor Eligible Telecommunication Carriers' (ETC) representatives who perform transactions in Lifeline systems. The RAD will track the representatives' activities to identify unusual, suspicious and potentially inappropriate behavior, and restrict their system access where appropriate.
Recertification	Annual review of an existing subscriber's eligibility, which is due by his or her respective enrollment anniversary date. Carriers are responsible for this where the National Verifier has not yet been implemented, but they may elect USAC to perform this function for them.
Reverification	One time verification of existing subscriber's eligibility, which is required as a state migrates into the National Verifier. This process differs from recertification because it does not rely upon any self-certification. USAC performs this function unless the carrier opts out and elects to perform this function themselves.
Voice Phase Down	Based on the 2016 Lifeline Order, support for voice service (not bundled with Lifeline qualifying broadband) will be reduced annually beginning on 12/1/2019.

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National Verifier: Current Status of Reverification

Existing Lifeline subscribers are only de-enrolled after they have ample opportunity to demonstrate eligibility.
1. Check available state and federal eligibility databases
2. Collect eligibility documentation their provider has on hand
3. Contact the subscriber directly for further documentation

The data below includes subscribers who were checked against the new CMS connection.
Subscribers who are "In Process" are subject to document review because they were not passed automatically by checking databases.

	Launch 1	Launch 2	Launch 3	Launch 4	Launch 5	Total
Number of subscribers in Reverification	**276,362**	**41,648**	**916,515**	**97,584**	**630,193**	**1,962,302**
Qualified	229,926	21,906	760,187	68,231	481,217	1,561,467
In Process	18,305	19,202	156,328	29,353	148,976	372,164
De-enrolled for reverification	28,131	540	-	-	-	28,671
Preliminary Reverification Pass Rate	**83%**	**53%**	**83%**	**70%**	**76%**	**80%**

As each launch still includes pending reverifications, these rates are preliminary and are subject to change.

Universal Service Administrative Company
High Cost & Low Income Committee Meeting

INFORMATION ITEM

Appendix B

Lifeline Business Update
Q3 2019 Update on Lifeline Administration

Overall Summary from Q3

There was notable progress with the National Verifier (NV) project in Q3 2019. USAC launched the highly anticipated connection to the Centers for Medicare and Medicaid Services (CMS), making automated Medicaid participation verification available nationwide, including Puerto Rico and the Virgin Islands. USAC also deployed the carrier eligibility and status check application programming interfaces (APIs) into the pre-production environment to allow carriers to begin testing the functionality. While no new states were launched in Q3, the FCC announced via public notice that Alabama, Arkansas, Louisiana, Maryland, Massachusetts, New Jersey, Oklahoma, Puerto Rico, South Carolina, and Washington would soft launch on October 11th. Further, the FCC announced via public notice that the June soft launched states of Arizona, Connecticut, Georgia, Iowa, Kansas, Nebraska, Nevada, New York, Vermont, Virginia, and West Virginia would hard launch on October 23rd. Related to other Lifeline initiatives, USAC completed additional program integrity projects, posted the Risk Assessment Request for Proposal (RFP) in partnership with the Procurement division, and continued technical development of the Representative Accountability Database (RAD).

Q3 Lifeline Program Updates & Accomplishments

- Launched NV connection to CMS, creating an automated, real-time Medicaid participation check nationwide and in Puerto Rico and the Virgin Islands.
- Deployed NV carrier eligibility and status check APIs to pre-production for carrier testing.
- Opened second Business Process Outsource vendor location for application processing and customer service operations to scale up with growing NV volumes.
- Completed the Lifeline Legacy System IT Modernization, which eliminated reliance on systems that were no longer supported, reduced databases from five to two, ensured FISMA compliance, reduced system deployment efforts from 8 hours to 90 minutes, and provided improved functionality for the business to evaluate claims faster and with lower burden.
- Completed development and testing of RAD lock out feature and reporting. These features are not yet deployed to production and timelines for carrier use are to be determined.
- Posted Risk Assessment RFP.

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- Completed additional program integrity reviews for deceased, oversubscribed, ineligible, and phantom subscribers. Kicked off a new non-usage program integrity sampling effort.
- Provided outreach and training related to the new Minimum Service Standards and Voice Phase Down that are effective December 1, 2019.
- Participated in the FCC Office of Native Affairs and Policy trip to Montana.
- Performed stakeholder outreach by visiting tribal leaders in the Navajo, Hopi, Zuni, and Laguna Pueblo nations regarding Lifeline eligibility checking processes and received overall feedback regarding the Lifeline program.
- Presented on Lifeline and the National Verifier at the WTA Fall Meeting.
- Conducted in-person consumer advocate training for Washington, D.C. community organizations, and met with FCC Consumer and Governmental Affairs Bureau to align on consumer communications and support.

Planned Activities for Q4

- Soft launched the NV in Alabama, Arkansas, Louisiana, Massachusetts, Maryland, New Jersey, Oklahoma, Puerto Rico, South Carolina, and Washington on October 11th.
- Hard launched the NV in Arizona, Connecticut, Georgia, Iowa, Kansas, Nebraska, Nevada, New York, Vermont, Virginia, and West Virginia on October 23rd.
- Soft launch all remaining states into the NV by December 31st.
- Continue reverification efforts across NV states.
- Continue testing the carrier eligibility and status check APIs for eventual production deployment.
- Support enterprise launch of the new website, improving search functionalities and Lifeline's web content organization.
- Implement system changes to support the Minimum Service Standards and Voice Phase Down changes.
- Present at the Washington Independent Telecommunications Association Conference, also visiting tribal and community organizations in the area.
- Present at the National Association of Regulatory Utility Commissioners Annual Meeting.

Lifeline Program Trends

The data below reflects a general drop in Lifeline subscribership and support over the past three years. In Q3, one company processed significant de-enrollments that drove the steeper than usual decline. The *2016 Lifeline Order* states that Lifeline support will be provided only for qualifying broadband services starting December 1, 2021 in most areas, with a two-year phase down of support for voice-only service or bundles without qualifying broadband service starting December 1, 2019. After December 1, 2021, a reduced voice support amount will be available to an ETC that is the only Lifeline provider in a Census block.
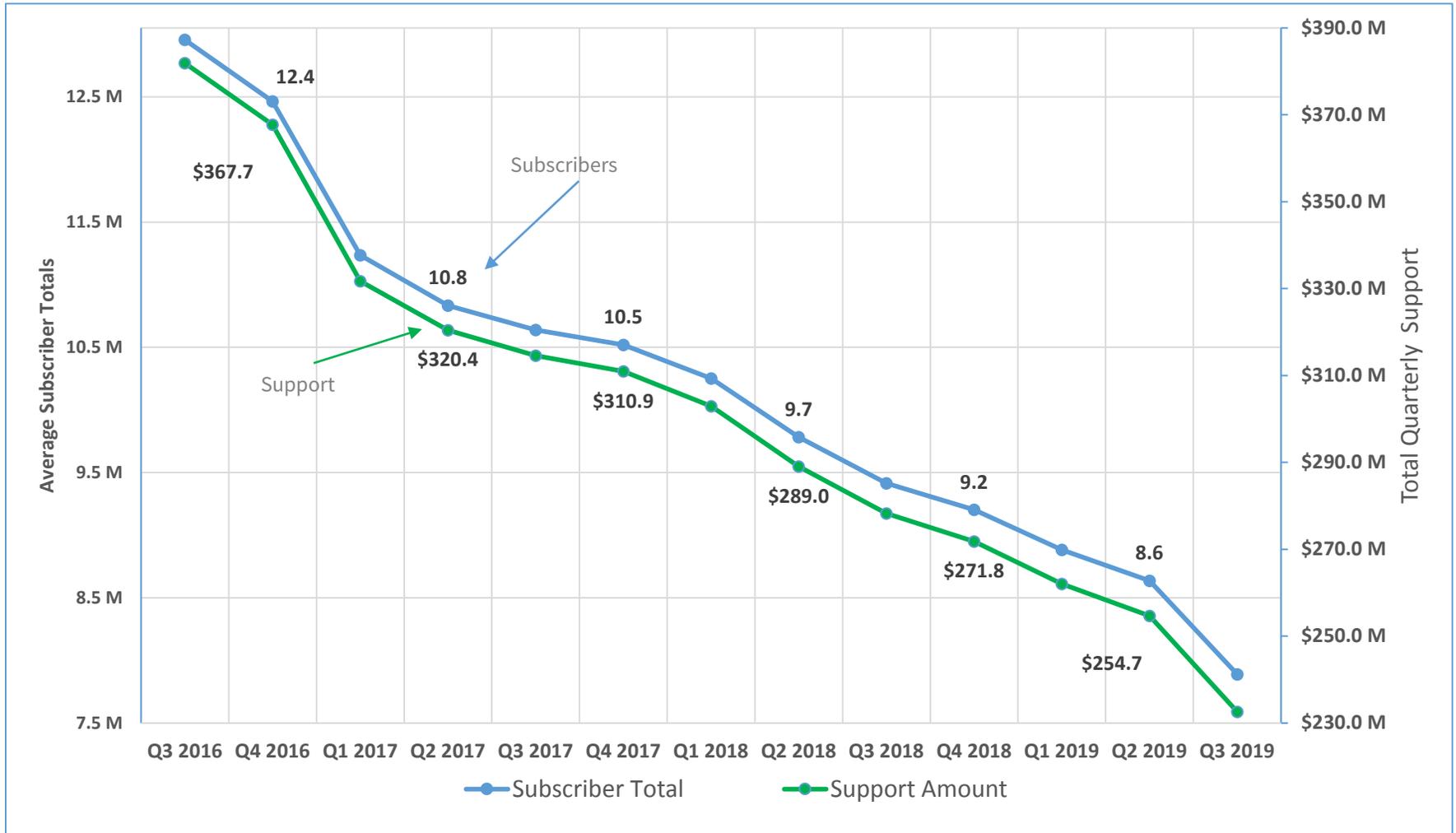
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Lifeline Program Service Type Trends[1]

Month	Broadband	Bundled Broadband	Bundled Voice & Broadband	Bundled Voice	Voice
Sep 2019	0.16%	53.29%	6.50%	27.77%	12.29%
Aug 2019	0.15%	52.00%	6.64%	28.72%	12.50%
Jul 2019	0.14%	53.61%	6.22%	27.62%	12.41%
Jun 2019	0.14%	53.02%	5.90%	28.01%	12.94%
May 2019	0.13%	52.37%	5.84%	28.41%	13.25%
Apr 2019	0.13%	52.07%	5.86%	28.50%	13.43%
Mar 2019	0.12%	51.76%	6.07%	28.43%	13.61%
Feb 2019	0.12%	52.13%	6.10%	27.81%	13.84%
Jan 2019	0.11%	51.93%	6.14%	27.79%	14.03%
Dec 2018	0.11%	51.35%	6.17%	28.07%	14.30%
Nov 2018	0.11%	66.68%	11.67%	6.87%	14.68%
Oct 2018	0.11%	67.90%	14.26%	2.66%	15.08%

- Broadband – Broadband service meeting minimum service standards
- Bundled Broadband – Broadband and voice, but only broadband meeting minimum service standards
- Bundled Voice & Broadband – Broadband and voice, both meeting minimum service standards
- Bundled Voice – Broadband and voice, but only voice meeting minimum service standards
- Voice – Voice service meeting minimum service standards

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[1] The Lifeline Program Service Type Trends chart was revised on 12/4/2019 to reflect the accurate percentage for each month.

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Lifeline Three-Year Quarter-over-Quarter Subscribership & Support Amounts

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Program Metrics for Q4 2018 – Q3 2019

Metric			Target	4Q2018	1Q2019	2Q2019	3Q2019	Variance to Target (most recent)		Comment
1	Disbursements Completed ($M)		$ 264.0	$ 274.7	$ 270.1	$ 254.1	$ 242.6	$ (21)	✔	Displays actual disbursements authorized, which includes original claims in the previous data month and prior revisions received. Updated target based on 3Q2019 projected support forecast.
2	System Uptime (%)	NLAD:	99%	100%	100%	100%	100%	+1.00%	✔	100% uptime in 3Q2019
		LED:	99%	100%	100%	100%	100%	+1.00%	✔	100% uptime in 3Q2019
3	Call Center Abandon Rate		3.00%	15%	17%	5%	11%	- 7.93%	🚩	BPO 2nd location began operation on 9/9, increasing resources to manage call volumes. While Q3 overall still missed the target, late September metrics have been on track.
4	Appeals over 90 days aged		0	84	94	97	89	+89	🚩	In 3Q2019, 18 appeals became over 90 days aged, 31 appeals aged over 90 days were denied, and two appeals aged less than 90 days were resolved through administrative remedy/withdrawn.
5	Appeals Average Age (days)		90	277	343	384	318	+228	🚩	Lifeline and OGC are continuing to work on the resolution of open appeals.
6	Manual eligibility verification (% of total applications w/ manual decisions)		TBD	44%	33%	25%	24%	N/A		Includes NV applications decided using manual documentation review due to failing eligibility database and/or NLAD checks, created within the actuals month. This does not include reverifications.
7	Average Manual Review Time	Real Time:	<10 min	7	8	6	5	-5 min	✔	Real time includes all applications received through the portal during business hours, requiring a manual review. Non-Real time includes all applications received outside business hours and all mailed in applications, requiring a manual review.
		Non - Real Time:	<48 hr		13.9 hr	9.3 hr	8.5 hr	-38h 6m	✔	

Legend

✔ On track

🚩 Action Required

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