



Rubb-A-Dubb-Dubb, What's the "Point" of HUBB?

Presented By:

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Depend On
Our People
Count On
Our Advice

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Rubb-A-Dubb-Dubb, What's the "Point" of HUBB...

I made a reception
drink ticket bet
with a co-worker
that I would
compose and
recite a poem
about HUBB in
front of an
audience

*"Rubb-A-Dubb-Dubb,
What's the point of HUBB,
Before your USAC audit,
Give your data a good scrub"
-Nobody, ever*

What is the Point?

INTRODUCTION

As of my last count, there are nine different high-cost programs reporting data in the HUBB, and Enhanced ACAM will make the tenth. These programs all have some type of build out obligation as a condition of support payments to report. But with password permission problems, frequent system failures, hidden certifications, duplicate and nearly identical deployment filings like BDC, and complicated eligible location definitions, we often find ourselves asking....what is the point?

Rubb-A-Dubb-Dubb, What's the Definition of HUBB?

I've filed in the HUBB since day one, and was today years old the first time I saw the acronym spelled out

HIGH-COST UNIVERSAL BROADBAND (HUBB) PORTAL

The HUBB is an online portal where carriers participating in funds with build out obligations to a set number of eligible locations in eligible areas over a defined timeline with interim and final milestone deadlines, report and certify their progress.

Rubb-A-Dubb-Dubb, What's the Definition of HUBB?

REPORTED DATA

Filed data includes latitude and longitude coordinates (literal points, on a map), speeds offered, and date of deployment for every location where **mass market** internet service is available. Carriers additionally can file certifications that their interim and final milestones have been met.

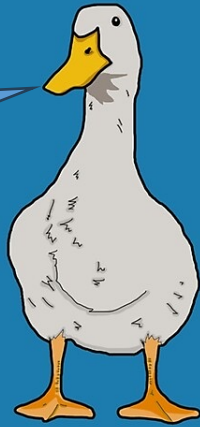
High-Cost Programs in HUBB

1. Alternative Connect America Cost Model (Original ACAM)
2. Revised Alternative Connect America Cost Model (Revised ACAM)
3. Alternative Connect America Cost Model II (ACAM II)
4. Connect America Fund Broadband Loop Support (CAF BLS)
5. Rural Broadband Experiments (RBE)
6. Alaska Plan
7. Connect America Fund Phase II Auction (CAF II Auction)
8. Rural Digital Opportunity Fund (RDOF)
9. Bringing Puerto Rico Together (Uniendo a Puerto Rico) Fund and the Connect the USVI Fund (PR/USVI)
10. Enhanced-ACAM

What's the (literal) point of HUBB-Eligible Location Definition

If it looks like a duck, swims like a duck, and quacks like a duck, then it probably is a duck.

I'm not an
Insurance
Affiliated
Duck



"I shall not today attempt further to define the kinds of material I understand to be embraced within that shorthand description and perhaps I could never succeed in intelligibly doing so. But I know it when I see it, and the motion picture involved in this case is not that." -Supreme Court Justice Potter Stewart, on the definition of obscenity, *Jacobellis v. Ohio*

What's the (literal) point of HUBB-Eligible Location Definition

“...the **residential and business** locations to which they [carriers] have made broadband **service commercially available** within their eligible service area within the relevant time period. Broadband service is available if the carrier provides it to the location or could provide it **within ten (10) business days upon request**. The **latitude/longitude** of location should be situated somewhere on the **parcel** of the location”

What's the (literal) point of HUBB-Eligible Location Definition

- Residential Locations

- Housing Units

- Occupants live separately from other individuals in the building
- Occupants have direct access to their living quarters from outside the building or through a common hall
- Report all housing units as defined by Census Bureau in HUBB as residential locations

- Apartment Buildings

- Multiple housing units in a single structure at a single address
- Report such buildings in a single record with a single latitude/longitude
- Enter number of units in units field

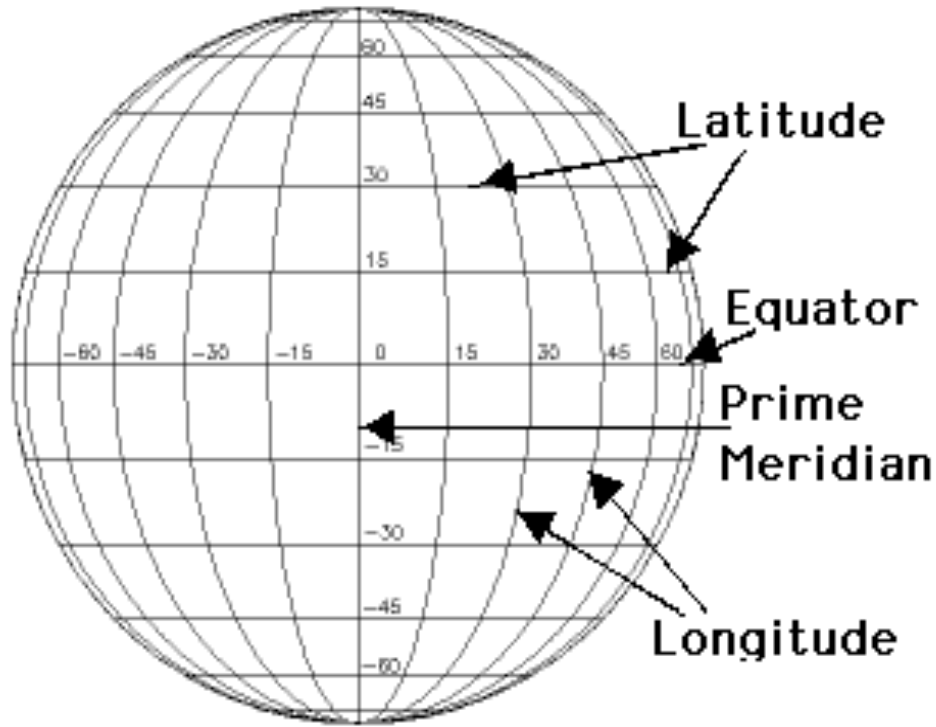
- Group Quarters

- Not classified as housing units
- **Do not report group quarters as residential locations**

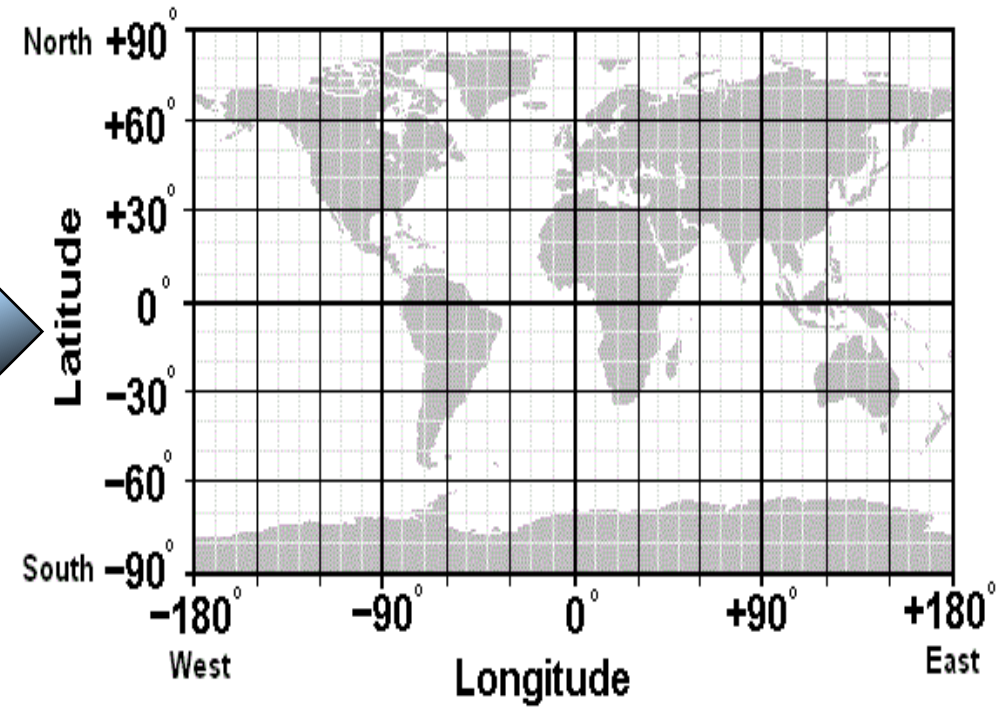
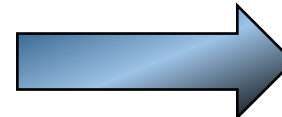
What's the (literal) point of HUBB-Eligible Location Definition

- Business Locations
 - Locations where “mass market” broadband service is available
 - Mass Market is typically common bundles of speeds and prices made available to anyone in the area, as opposed to a contractual, negotiated, or services that aren't obviously marketed on a website (tariffed services, not marketed to everyone, like ETS)
 - Businesses that would demand “consumer grade” broadband service
 - Typically this means small businesses
 - Consumer grade usually means “best efforts” instead of a more reliable speed like a special access circuit
 - Business Data Service(BDS)/Special Access
 - Do not report locations of larger businesses that would be expected to purchase dedicated high-capacity transmission services like BDS or special access
 - Multi-Units
 - Report buildings with one address and multipole units as a single records and report the units/suites

What's the (literal) point of HUBB-Eligible Location Definition



GIS



www.satsig.net

Doesn't the Broadband Serviceable Location Fabric do this for me? Wake me up when we get to the complaining about USAC part

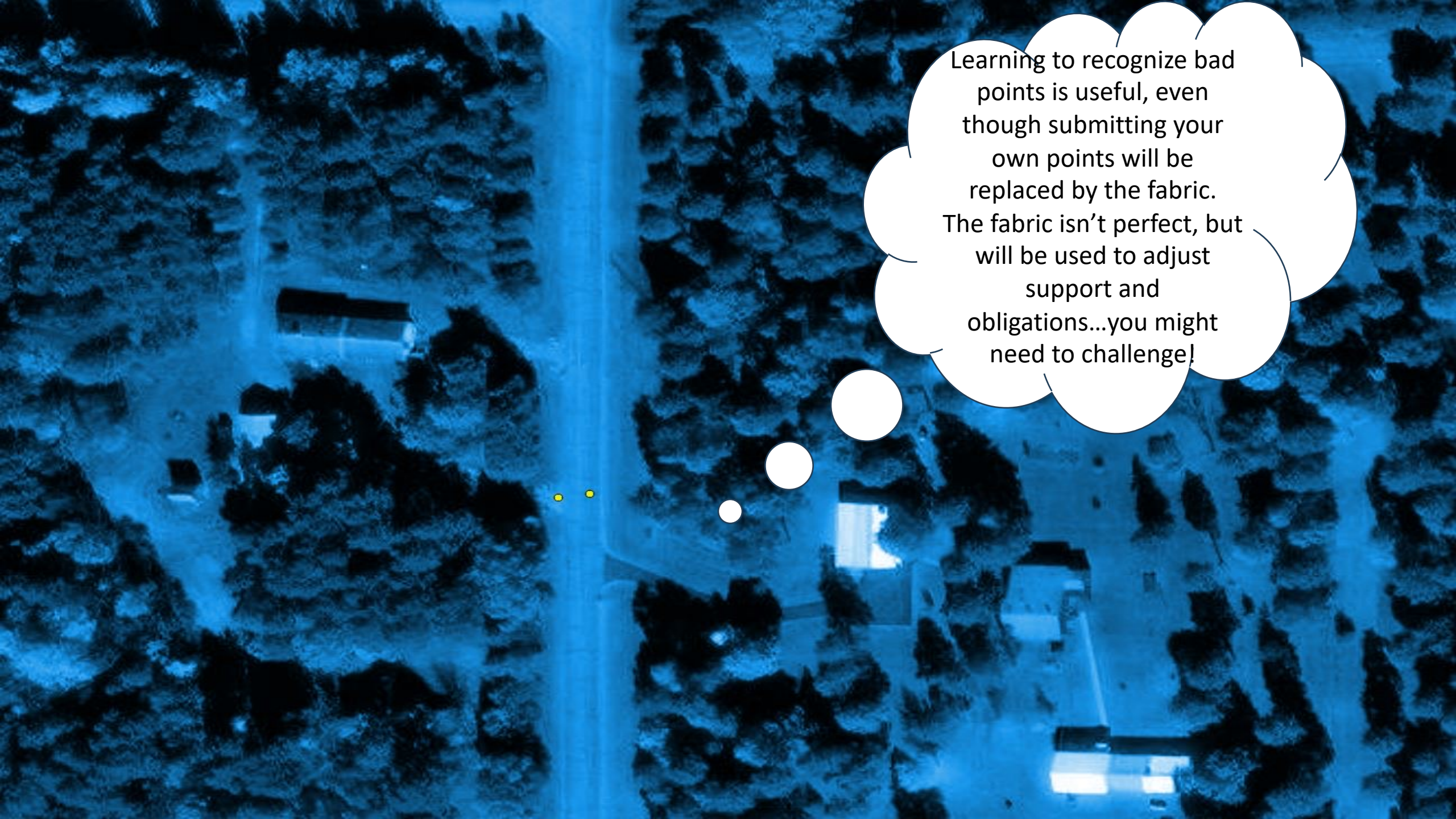
Don't worry, I'll discuss Fabric Vs HUBB differences, and I will always complain about USAC at least once. But spoiler alert, you're right, the FCC is updating HUBB to use fabric IDs



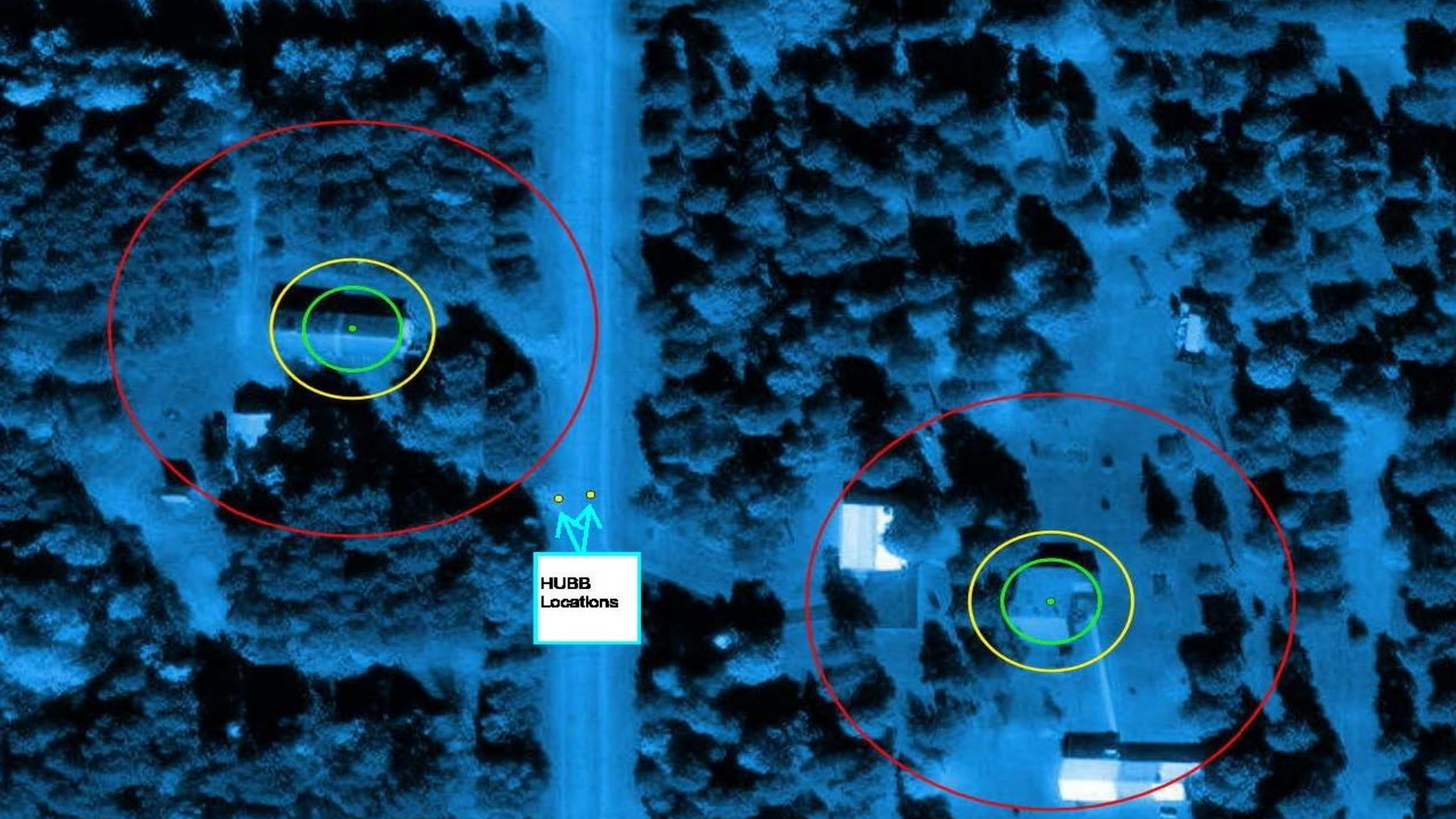
Survey Time

- Is there anyone from USAC here?
- Have you reported a local school in your HUBB data?
- Do you have locations that look like the locations in the next slide in your HUBB data, and did they help you with your milestone?



An aerial photograph of a residential neighborhood, heavily filtered with a blue color cast. The image shows a central road with several houses and trees on either side. In the lower right quadrant, there is a large white thought bubble containing text. To the left of the thought bubble, there are three white circles of increasing size, and two small yellow dots on the road. The overall scene is dimly lit, suggesting dusk or dawn.

Learning to recognize bad points is useful, even though submitting your own points will be replaced by the fabric. The fabric isn't perfect, but will be used to adjust support and obligations...you might need to challenge!

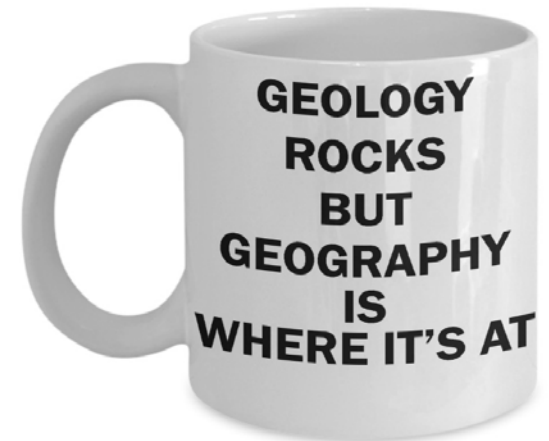


HUBB
Locations

Point Me in the Right Direction

DO REPORT

- All residential and business locations as described above
- Locations to which service could be provided within 10 business days
- An apartment building (multiple dwelling unit) or multi-unit business location in a single record



Point Me in the Right Direction

DO NOT REPORT

- The location of the network's pedestal, box, or node ☒
- Empty parcels of land ☒
- Houses or buildings under construction ☒
- **Group quarters**, such as dormitories, nursing homes, residential treatment centers, military installations, or correctional facilities – as residential locations ☒
- **Community anchor institutions** (regardless of the size). Community anchor institutions include such entities as schools, libraries, hospitals and other medical providers, public safety entities, institutions of higher education, and community support organizations that facilitate greater use of broadband by vulnerable populations, including low-income, the unemployed, and the aged. ☒
- Wireless infrastructure sites, such as cell towers ☒

Point Me in the Right Direction

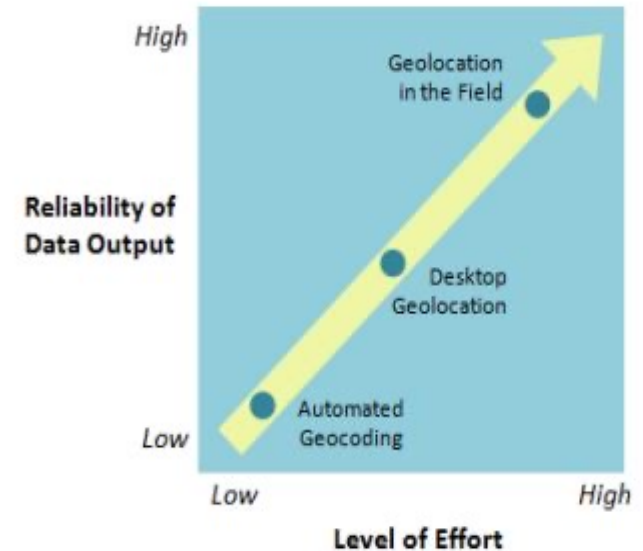
DO NOT REPORT

- The locations of businesses expected to purchase dedicated high-capacity transmission, such as business data services ☒
- Structures that are open to the elements—that is, the roof, walls, windows, and/or doors no longer protect the interior from the elements ☒
- Vacant structures that are condemned or are to be demolished (often indicated by a sign on the structure) ☒
- Boats, recreational vehicles (RVs), tents, caves, and similar types of shelter that no one is using as a residence

Point Me in the Right Direction

GEOLOCATION DATA COLLECTION GUIDANCE

- When possible, location coordinates should be collected at some point inside the structure's footprint (AKA rooftop)
- At a minimum coordinates should be on the correct property or parcel ☒
- Automated geocoders, especially those based on billing system addresses, are unreliable ☒





What's the point of (reason for) HUBB

Good Point

- Certify your Milestones
- We can map locations
- USAC can verify deployment
- It's the starting point for PMM
- Reflecting new Enhanced ACAM obligations is easy, we'll just have you put deployment on fabric IDs

Pointless

- Do we need the HUBB just for this?
- But then what is broadband map for?
- What are availability challenges for?
- Can't we use fabric IDs?
- It looks like this was taken from the instructions for the BDC filing word for word...

What's the point of (reason for) HUBB

Good Point

- I have locations in the HUBB that aren't in the fabric, the fabric is not updated, and I want credit for them
- USAC already has this portal set up, and is working on a new HUBB that accepts data based on fabric location IDs
- At least my enhanced ACAM true up will reflect my efforts in HUBB

Pointless

- Why not challenge the fabric and participate in the national effort to identify and serve BSLs?
- That's great if we're shooting for a 40% FUSC instead of 35%
- Only if you have already challenged locations in HUBB but not in Fabric before March 8

If obligations go down for fixes...so does support

Fabric/Obligation Reconcile Public Notice

- DA 24-77 Released January 25, 2024
- WCB previously delegated the task of revising deployment obligations for various programs once more information was available
- Broadband Data Act defines the Broadband Serviceable Location Fabric as “common dataset of all locations in the United States where fixed broadband internet access service can be installed as determined by the Commission”
- Currently the FCC expects support recipients will review data to identify inconsistencies between HUBB and Fabric
- Moving forward, and starting with E-ACAM, FCC and USAC are developing a new version of HUBB based on Fabric IDs.

Fabric/Obligation Reconcile Public Notice

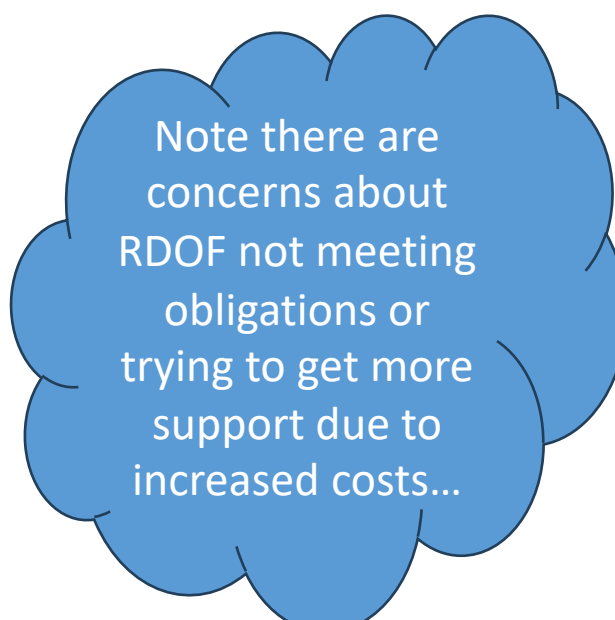
- “As carriers deploy broadband service in satisfaction of public interest obligations, they will report those eligible Location IDs in the HUBB”
- “We propose using the Fabric as the data source to revise and verify deployment for a number of high-cost support mechanisms”
- FCC Seeks comments on this proposal and specific issues related to revising deployment obligations. There is risk here for pro-rata support decreases associated with location decreases.
- Propose to exclude group quarters (even though they are in the fabric) to be consistent with HUBB
- Propose to use structure location in instances where parcels are split by supported areas

Fabric/Obligation Reconcile Public Notice

- Should any sources supplement fabric, are identified adjustments appropriate, are there any adjustments to ensure accurately identifying eligible locations within census blocks in service areas?
- ACAM I and ACAMII
 - Should FCC permit recipients to seek a downward adjustment in location totals?
 - Should downward adjustment reduced on pro-rata basis to simplify speed tiers?
 - Should support be reduced on pro-rata basis (note that reduction is assumed)
 - What should the timing? Multiple opportunities, or just one? Which fabric release?
- BLS not addressed at all, as the commission deferred the commencement of the next 5 year term until January 1,2025 as it considers “general program reforms”
- Other programs are various versions of trading obligation decreases for support decreases.
- AK plan should connect 100% of locations at performance level consistent with the middle mile commercially available (middle mile filings are a reason to keep HUBB alive)

DA 24-77-Comments

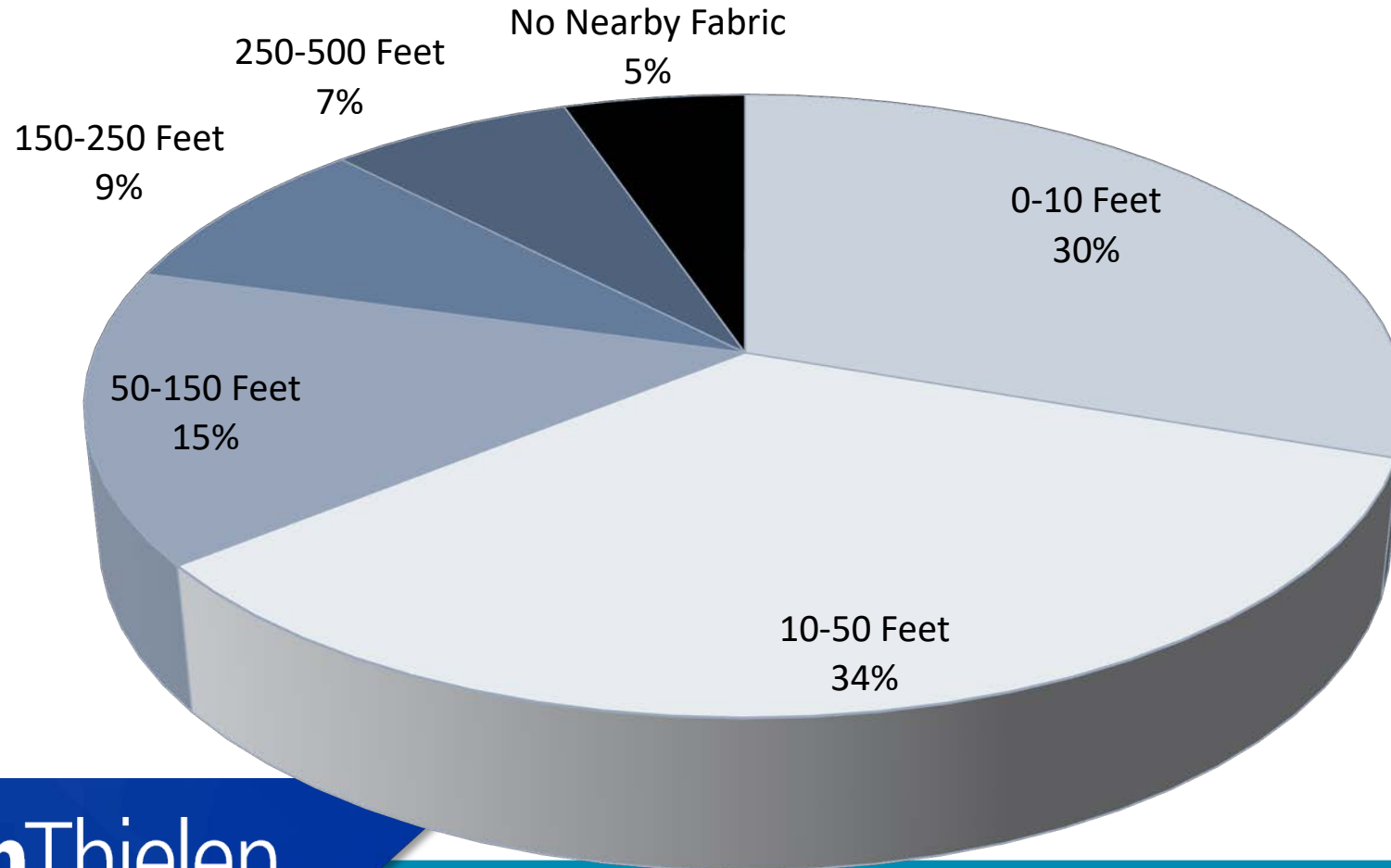
- NTCA
 - Only merge obligations and Fabric for new programs
 - Only merge obligations and Fabric when Fabric is sufficiently updated
 - Voluntary downward adjustments of obligations should be allowed
 - ACAM Support decreases should be based on cost, not pro-rata
 - Shifting to 100% build-out in AK is problematic, and should be addressed in AK Connect Fund proceeding instead
- Coalition of RDOF Winners
 - Increase support on a pro-rata basis if new roads are built
 - Do not reduce support on a pro-rata basis if all roads are built
 - Address Fabric issues before merging
 - Include group quarters when merging
- WTA
 - Obligation reductions should be voluntary
 - Support reductions should not be pro rata adjustments



Note there are concerns about RDOF not meeting obligations or trying to get more support due to increased costs...

Observations From Preparing Fabric Challenges

Hubb To Fabric Distances



Questions? Comments? Rude Gestures?



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