

General Form 477 Questions

Q: What is the URL for the new filing interface?

A: The new Form 477 filing interface can be accessed online at <https://apps2.fcc.gov/form477/>.

Q: Are there screenshots for the new filing interface?

A: Filing Interface Screenshots have been posted to the new Form 477 Resources for Filers webpage, <http://www.fcc.gov/encyclopedia/form-477-resources-filers>, and can be accessed directly at <http://www.fcc.gov/form477/477screenshots.pdf>.

Q: Is there a user manual for the new filing interface?

A: A Filing Interface User Guide has been posted to the new Form 477 Resources for Filers webpage, <http://www.fcc.gov/encyclopedia/form-477-resources-filers>, and can be accessed directly at <http://www.fcc.gov/form477/477guide.pdf>.

Q: Where can I find out if my company has a Study Area Code (SAC)?

A: Study Area Codes (SACs) can be searched online [here](#). Service providers that are eligible for financial support from the federal Universal Service Fund have SACs. (Eligibility for support is typically determined by the State telecommunications regulators, under procedures set out in the FCC's rules at C.F.R. § 54.201-209). For example, all incumbent local exchange carriers (ILECs) have SACs. However, only a handful of the cable TV system operators that provide fixed voice service are designated "eligible telecommunications carriers" and, therefore, have been assigned SACs.

Q: Where can I find out if my company has a Form 499 Filer ID?

A: Form 499 Filer ID(s) can be searched online [here](#). Providers of (only) cable TV service and / or broadband Internet access service would not have a Form 499 Filer ID. However—concerning what's relevant directly to the Form 477 filing requirements—each entity that sells local exchange telephone service to end users, or that sells interconnected VoIP service to end users, should have registered with the Universal Service Administrative Company (USAC) and been assigned a Form 499 Filer ID. Information about obtaining a Form 499 Filer ID is available at <http://www.usac.org/cont/about/filer-id/default.aspx>.

Q: What do I enter for Study Area Code (SAC) and Form 499 Filer ID if my company is a Non-ILEC that only provides fixed wireless broadband service?

A: These fields would be left blank in the Filer Identification section of your Non-ILEC filing. (Note: Companies that provide only broadband Internet access service would not have a Form 499 Filer ID.)

General Form 477 Questions - Continued

Q: Within the Fixed Broadband Subscription - Interactive Data Entry webpage, I have picked a state and county but the tract drop-down displays "Select..." versus displaying a list of valid census tracts. How do I fix this?

A: If you are using Internet Explorer as your web browser, hit F12 and click on the "Browser Mode" tab. The default selected uses the "Internet Explorer Compatibility View." Select the latest version of Internet Explorer that is listed, but that does not say Compatibility View. Then, click on the "X" in the upper right hand corner to close the screen. This should resolve this issue. If it does not (and in any case), you can use other web browsers, such as Chrome, Firefox, or Safari which do not have this issue.

Q: If we do not offer mobile services, then we do not need to do anything with that part of the report, correct?

A: If there is a section of the form that doesn't apply to you, just skip it. For example, you should not go into a section of the form that doesn't apply to you and enter zeros for all questions.

Q: Do my csv files need to be named in any special way?

A: No.

Q: Are there any file size limitations for loading shapefile(s) in the new filing system?

A: We are not aware of any file size limitations. However, the shapefiles must be zipped, and they must not contain any folders. Technical specifications are discussed at http://transition.fcc.gov/form477/MBD/formatting_mbd.pdf and http://www.fcc.gov/form477/MBD/shapefile_template_mbd.zip.

Q: Is it correct that I no longer need to file a separate Form 477 for each state since all states are included in one form for the company?

A: Yes. All states may be included in any type of filing (ILEC or Non-ILEC) that you are required to file.

Q: Can we report the broadband data of our affiliated cable company along with the data on our ILEC report since it also operates in the ILEC service area?

A: Yes.

Q: We have two FRNs; one is for CLEC and the other for ILEC. Since the csv contains data for both, do we just use one?

A: First, be sure about the number of separate forms you must submit. If the CLEC provides fixed voice (local exchange telephone and/or interconnected VoIP) service to subscribers with service addresses that lie outside the ILEC Study Area, then that particular information must go into a separate, non-ILEC filing, which would require a separate csv upload. However, assuming that's not the case and you are required to make only one filing, you

General Form 477 Questions - Continued

may use the ILEC's FRN. However, be sure to list both ILEC and CLEC Form 499 Filer IDs in the Filer Identification section of the form.

Q: If multiple ILEC entity data is filed in a single submission, what Provider Name and Holding Company Name should we use on the Filer Identification page?

A: Please use the Holding Company / Common Control Name for the Provider Name (that is, the answers to questions 2 and 3 of the Filer Identification section will be identical). Also, be sure to include all ILECs Study Area Codes and Form 499 Filer IDs. (Furthermore, if these entities have individual websites, those could be noted in the Explanations and Comments section of the form.)

Facilities-based Broadband Providers that Use Wholesale Sales Channels Questions

Q: For Fixed Broadband Deployment, the new system requests for each census block, “DBA Name: Name of the entity customers could contact to purchase service in this block with the characteristics below.” Because of the wholesale model we use, sometimes we ourselves won’t offer a given service, how should we proceed in these instances?

A: (*Revised September 10, 2014.*) The fixed broadband deployment data will be used to populate the National Broadband Map, a visual representation of areas in which broadband Internet access is available to end users. (The term "available" is discussed at http://transition.fcc.gov/form477/FBD/definitions_fbd.pdf.)

If there are blocks in which your company’s broadband Internet access service is sold to end users only through a reseller or aggregator, include those blocks in your list of blocks. If there are some blocks in which you only wholesale, some in which you retail & wholesale, or some with just retail, it would help if you would show that parenthetically in the DBA Name field – i.e., in wholesale-only blocks, list the dba as “YourName (wholesale).” This will allow us to distinguish your sales channels for different blocks on the Map, giving your potential customers (both retail and wholesale) more information.

Q: We own and equip “last mile” connections to homes and business that are used for Internet access service, but independent, 3rd party Internet Service Providers have all the retail contacts (sales, billing, customer support). Who reports what?

A: (*Revised September 10, 2014.*) In the **Fixed Broadband Subscription** section, you report the broadband connections that are in service—and the 3rd party retail ISP does not report them. In the **Fixed Broadband Deployment** section, you report the area (census blocks) where your connections are available—and the 3rd party retail ISP does not report that information. (The term "available" is discussed at http://transition.fcc.gov/form477/FBD/definitions_fbd.pdf.) In this situation, it would be appropriate to use “YourName (wholesale)” for every entry in the DBA Name field of the fixed broadband deployment upload file. Also, if you have a webpage that explains that your broadband connections are only available through retailer ISPs, it would be helpful to the National Broadband Map if you reported that particular website either in the Filer Identification section of the form or as a note in the Explanations and Comments section.

Fixed Wireless Broadband Questions

Q: I don't see that Fixed Wireless Broadband providers will have to file going forward. Is that correct?

A: No, that is not correct. Fixed Wireless Broadband providers are required to file Form 477.

Q: Please explain the expected accuracy or accepted methods of obtaining the data for the new deployment data requirement. For WISPs, accurate deployment data is difficult to obtain and subject to a fair amount of interpretation and analysis.

A: Fixed wireless broadband providers should report in their deployment data a list of census blocks where they make broadband service available. More information on the term "available" can be found at http://transition.fcc.gov/form477/FBD/definitions_fbd.pdf and general information on census blocks can be found at http://transition.fcc.gov/form477/Geo/more_about_census_blocks.pdf. It is up to the provider to determine its deployment footprint based on the guidance provided in those documents and in the Form 477 Instructions which are online at <http://www.fcc.gov/form477/477inst.pdf>, but one option would be to use GIS/mapping software (ArcMap, MapInfo, and QGIS are examples) to determine the census blocks that are at least partially covered by the provider's broadband network coverage area, which could be based on a certain radius around the transmitter(s) depending on how a provider generates its coverage maps. Another option would be to start with the list of blocks for that provider, which is available for download through the National Broadband Map, <http://www.broadbandmap.gov/data-download>. If you are having trouble understanding or using those data, then it might be worthwhile to contact the provider's state mapping entity for assistance. While the NTIA State Broadband Initiative program is ending after this year, the state entities are still available to provide assistance through the last collection of those data, also by October 1. We encourage providers to take advantage of this resource to determine a "baseline" set of blocks included in their deployment footprint. WISPs who have not provided data in the NTIA State Broadband Initiative filed in the past can seek the assistance of their state entity in creating and submitting a coverage map for this last NTIA filing round, which would then be used to generate a list of overlapping census blocks. And unless a WISP operates in multiple states, it would only need to contact a single state entity.

Q: Would it be possible for a fixed wireless broadband provider to submit a shapefile in lieu of a census block listing of deployment areas?

A: No, uploading shapefiles is not an option for fixed wireless broadband providers.

Q: How do we designate and report Hot Spot usage?

A: Hot spot usage should not be reported on Form 477.

Q: We are a fixed wireless Internet provider that resells a 3rd party's VoIP service. Do we need to fill out the phone line section?

A: You need to fill out the Fixed Voice Subscription section if you arrange to put your own brand name on the VoIP service. However, if you only tell your Internet customers that their service is capable of supporting VoIP,

Fixed Wireless Broadband Questions - Continued

and they make their own arrangements with the 3rd party VoIP provider, then you would not fill out the Fixed Voice Subscription section.

Interconnected VoIP Questions

Q: What is the definition of “interconnected VoIP service”? For example, if we are reselling from a wholesale provider, but do not have our own soft switch or interconnect agreements, must we still file the Fixed Voice Subscription section?

A: Yes, you must file Fixed Voice Subscription information for a “plug and play” VoIP service that you obtain from an underlying telecommunications carrier and sell under your own brand name. For example, one such service is advertised on the underlying carrier’s website as a “switchless VoIP” or “cloud” service that empowers VoIP resellers “to offer a quick and easy VoIP solution to their End Users without a capital expense investment.” The Commission’s four-element definition of interconnected VoIP service is discussed at http://www.fcc.gov/form477/FVS/definitions_fvs.pdf.

Voice Service Reseller Questions

Q: Have landline resellers had to file Form 477 in the past or is this a new requirement?

A: This is not a new requirement. All (irrespective of size) competitive local exchange carriers (CLECs) with end-user customers have been required to file Form 477 since 2005. The [Glossary](#) of the [Form 477 Instructions](#) defines a CLEC as “an entity authorized, by the state regulatory authority (State commission), to provide local exchange telephone service within the Study Areas of one or more incumbent local exchange carriers in that state.” Also, entities that sell Interconnected VoIP service to end-user customers under their own brand name have been required to file Form 477 since 2009.

Q: If we resell mobile services from a large carrier, then we only need to fill out the Mobile Voice Subscription file, correct?

A: No, that is not correct. If your only business is mobile voice resale (“cellphone service” resale), then you should not file Form 477 at all. Instead, all mobile voice subscribers will be reported by the underlying wireless network providers. In particular, any mobile voice reseller that has filed a Lifeline Compliance Plan, as discussed at <http://www.fcc.gov/encyclopedia/lifeline-compliance-plans-etc-petitions>, should not be reporting its Lifeline Program cellphone subscribers on Form 477. Again, those subscribers will be reported by the underlying wireless network providers.

Broadband Speed Questions

Q: We advertise bandwidth sold; however we don't mention the additional bandwidth (3 to 14 Mbps) we provide customers for IPTV in our advertising. Do we include that amount in the broadband subscription information we file?

A: No, do not include additional bandwidth provided exclusively for delivering video programming channels.

Census Tract and Census Block Questions

Q: Please clarify what's tract level data and what's block level data.

A: The differences are shown in the chart on page # 10 of the 477 Instructions, <http://transition.fcc.gov/form477/477inst.pdf>. In sum:

The only **census block level** data are for **Fixed Broadband Deployment**—that is, where broadband Internet access service is “available.” This information is similar to the information that has appeared in the National Broadband Map developed by the U.S. Department of Commerce/NTIA in cooperation with a designated broadband mapping entity in each state.

The **census tract level** data are for **Fixed Broadband Subscribership** (as has been the case) and now also for **Fixed Voice** (local exchange telephone and interconnected VoIP) **Subscribership**. Additionally, facilities-based mobile broadband providers (that is, the carriers that provide mobile service using their own network facilities and licensed spectrum) will list the census tracts where they advertise service and make it available to subscribers—thereby identifying any areas where they have facilities in place that are only used to serve in-transit subscribers.

Q: In Fixed Voice Subscription data entry, do you have to record each county that you sell Local Services in or just one for the county that our office is located in?

A: Fixed Voice Subscription – Interactive Data Entry is a new part of the form. Before, the number of Local Service customers was counted for the entire state. Now, the number of Local Service customers must be counted for each census tract—and the customers must be matched to the census tract that contains the customer's service address (not the billing address, if that's different). (For any “bring your own broadband” interconnected VoIP customers, the address to use is the customer's Registered Location for E911 purposes.) Some tools to match addresses to census tracts are discussed at http://transition.fcc.gov/form477/Geo/more_about_census_tracts.pdf.

Q: I have several hundred subscribers at hundreds of different addresses. Is there an easy way to determine the census tract code(s) for these locations?

A: We understand that this will be a new process for Form 477 filers that have been reporting fixed voice (local exchange telephone and interconnected VoIP) services but not reporting fixed broadband Internet access connections. (Fixed broadband connections have been reported by census tract since 2009.) Some tools to match addresses to census tracts are discussed at http://transition.fcc.gov/form477/Geo/more_about_census_tracts.pdf. The Commission does not recommend any particular vendors of professional services in this area, but some members of trade associations in which your company participates may have had relevant experience.

Data Corrections Questions

Q: How often can providers update data?

A: Form 477 is due twice a year—to report June 30 data by September 1, and to report December 31 data by the following March 1. A filer may enter the filing interface at any time to make corrections. Section 7.5 of the [Form 477 Instructions](#) explains that filers must revise data when they discover a significant error—for counts, that’s a difference amounting to 5 percent or more of the filed number.

Q: How will you handle situations where the accuracy of the data is being questioned? What will be the process to make corrections?

A: Typically, the Form 477 team checks reported subscribership data for unusual trends and contacts the filer for clarification. For example, reported data should compare reasonably to similar information reported in the filer’s annual reports to shareholders or to the Securities and Exchange Commission (SEC). The Form 477 filing interface remains open to accept corrected data. Regarding broadband deployment information, in particular, most of the reported information will appear in the National Broadband Map (as has been the case all along), and the public can provide feedback on the information published on that Map. When the Commission uses deployment information to identify areas that may be eligible for Connect America Fund (CAF) support, it typically sets up (through a Public Notice) a process and window of time for parties to challenge whether a particular area truly is “served” or “not served.” If such challenge process reveals inaccurate broadband deployment information, the filer of that information will be expected to correct its Form 477 filing.
