

Supplemental response to questions 6(e), 7(e), 8(e), and 16

At the present time, the Commission is unable to provide a response to these questions because it is in the process of finalizing an accurate set of study area (or service area) boundaries for all incumbent local exchange carriers (ILECs) upon which this response will rely. Without a comprehensive set of accurate study area boundaries based on information provided to the FCC by ILECs, the Commission would need to rely on a commercial data set, the accuracy of which we cannot fully verify.¹ However, the Commission is in the final stages of a process that will provide a nationwide study area boundary data set.

The Commission's Wireline Competition Bureau (Bureau) received an initial set of study area boundary data from ILECs and certain state public utility commissions in May and June of 2013. Since that time, the Bureau has addressed errors in the submitted data – including geometry, spatial reference, and attribute (or data table) errors – some of which required ILECs to resubmit and recertify corrected data. After receiving and reviewing the resubmissions, the Bureau analyzed the overlaps and voids found in the submitted data and developed a plan for reconciling such conflicts as quickly and efficiently as possible.

The first step in that reconciliation was the publication, on December 2, 2013, of an online map depicting the submitted study area boundaries, as well as the overlaps and voids in the boundaries. The map can be accessed at <http://apps.fcc.gov/wcb/sabdata/>. Concurrently, the Bureau issued a Public Notice² encouraging ILECs to take the following actions: (1) review the online map, (2) resolve any overlaps and voids with neighboring ILECs based on discussions with one another and/or input from state entities, and (3) resubmit and recertify study area boundary data based on any boundary modifications agreed to by the relevant parties no later than January 13, 2014. The Public Notice also recommended that state commissions review the online map in order to modify their data submissions as necessary and to advise the ILECs in their state on resolving boundary overlaps and voids.

In addition to requesting corrections from ILECs and state commissions in response to the online map, the Bureau is conducting its own analysis of voids to determine if such areas are populated and, if so, which carrier serves such areas. The Bureau also plans to contact ILECs and state commissions directly in cases where both parties submitted boundaries for the same study area but the boundaries do not match, to reconcile such differences.

On December 17, 2013, several industry trade associations filed a joint petition requesting a stay or six-month extension of the January 13, 2014 deadline for filing revised study area boundary data. On January 9, 2014, the Bureau granted an extension of this deadline to March 17, 2014.³

Given that the Commission does not currently have a fully reconciled and reliable set of study area boundaries, we are unable to provide a meaningful response to the questions at this time. We will provide our response as soon as possible after we have validated the final study area boundary data set.

¹ The Commission has previously used study area boundary information from a commercial data set but allowed carriers to submit corrected boundary information where inaccuracies were identified and the corrected boundary information was validated.

² Wireline Competition Bureau Publishes Online Map of Submitted Study Area Boundaries, Announces Procedures for Filing Revised Data, WC Docket Nos. 10-90 and 05-337, *Public Notice*, DA 13-2296 (WCB rel. Dec. 2, 2013).

³ Connect America Fund, High-Cost Universal Service Support, WC Docket Nos. 10-90 and 05-337, *Order*, DA 14-28 (WCB rel. Jan. 9, 2014).