

Connect America Cost Model (CACM)

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Model Methodology

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2 Introduction

In its entirety, the Connect America Cost Model (CACM or CAM) provides for the identification of universal service support amounts through a series of processing steps, consistent with the direction provided by the USF/ICC Transformation Order and FNPRM (FCC 11-261) regarding Connect America Phase II, and all subsequent direction.

CACM calculates the cost of building an efficient network capable of providing voice (via carrier grade Voice over Internet Protocol (cVoIP)) and broadband-capable service.¹ The model develops the investment and cost for voice and broadband-capable network connections to locations utilizing the existing wireline serving wire center locations. The process of developing a universal support amount takes the cost output from the Cost to Serve Module along with user-defined parameters to calculate a result representing universal service support specific to the user request.

The Support Module calculates an amount of universal service support by taking cost calculated by the Cost to Serve Module for a given set of inputs (i.e., a Solution Set) along with user-defined upper and lower thresholds. These calculations are based on granular cost information about which areas require support given those user-specified upper and lower thresholds.

2.1. Overview

CACM estimates the cost to provide voice and broadband-capable network connections to all locations in the country. In its entirety, CACM provides specific details at the Census Block level, for both (1) the forward-looking cost to deploy and operate carrier grade Voice Over Internet Protocol (cVoIP) service and a broadband-capable network and (2) universal service support levels for that voice and broadband-capable network. The voice and broadband-capable cost development process in CACM is based on the follow key criteria:

1. Forward--Looking Cost Methodology.²
2. Network Topology and technology consistent with efficient technologies being deployed by service providers today.³
3. Granular details / calculations to the Census Block level for all locations.⁴

¹ Modeled network efficiency is a product of CACM's using real-world optimized algorithms to minimize road distances, current technology selections, current demand targets and related engineering rules.

² *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17727, para. 166, (2011) (*USF/ICC Transformation Order and FNPRM* or Order or FNPRM), *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011) (“Specifically, we adopt the following methodology for providing CAF support in price cap areas. First, the Commission will model forward-looking costs to estimate the cost of deploying broadband-capable networks in high-cost areas and identify at a granular level the areas where support will be available”).

³ *USF/ICC Transformation Order and FNPRM*, 26 FCC Rcd at 17736, para. 189 (“We conclude that the CAF phase II model should estimate the cost of a wireline network”).

4. All locations including the Continental United States, Alaska, Hawaii, Puerto Rico, U.S. Virgin Islands and Northern Marianas Islands.⁵
5. Carrier grade voice over internet protocol (cVoIP) and broadband capable network.
6. Utilize data from various sources, including the National Broadband Map (NBM), for identification of served and unserved locations, including the ability to exclude Census Blocks served by an unsubsidized competitor from funding.⁶
7. Reflect cost differences consistent with the actual geographic conditions associated with the study area as well as construction and operational cost differences related to carrier size.
8. Consistent in all aspects with the Commission Order FCC 11-161 and all subsequent direction.

2.2. Architecture, Function and Logic

The following three schematics provide important introductory views of CACM. An understanding of the CACM overall environment, its basic architecture (components) and its processing flow will assist with understanding the CACM methodology.

- Figure 1 – a relatively high level view of the overall modeling environment
- Figure 2 – a mid-level view of CACM’s basic architecture
- Appendix 5 – a more detailed view of CACM’s processing flow

This initial view of CACM’s modeling environment shows how the inputs and tools used to develop the network topology (CQLL and CQMM) relate to the fundamental model.

⁴*USF/ICC Transformation Order and FNPRM*, 26 FCC Rcd at 17735-36, para. 188 (“We conclude that the CAF Phase II model should estimate costs at a granular level –the census block or smaller – in all areas of the country”).

⁵*USF/ICC Transformation Order and FNPRM*, 26 FCC Rcd at 17737, para. 193 (“We direct the Wireline Competition Bureau to consider the unique circumstances of these areas (Alaska, Hawaii, Puerto Rico, the U.S. Virgin Islands and Northern Marianas Islands) when adopting a cost model, and we further direct the Wireline Competition Bureau to consider whether the model ultimately adopted adequately accounts for the costs faced by carriers serving these areas”).

⁶*USF/ICC Transformation Order and FNPRM*, 26 FCC Rcd at 17729, para. 170 (“In determining the areas eligible for support, we will also exclude areas where an unsubsidized competitor offers broadband service that meets the broadband performance requirements described above, with those areas determined by the Wireline Competition Bureau as of a specified future date as close as possible to the completion of the model”).

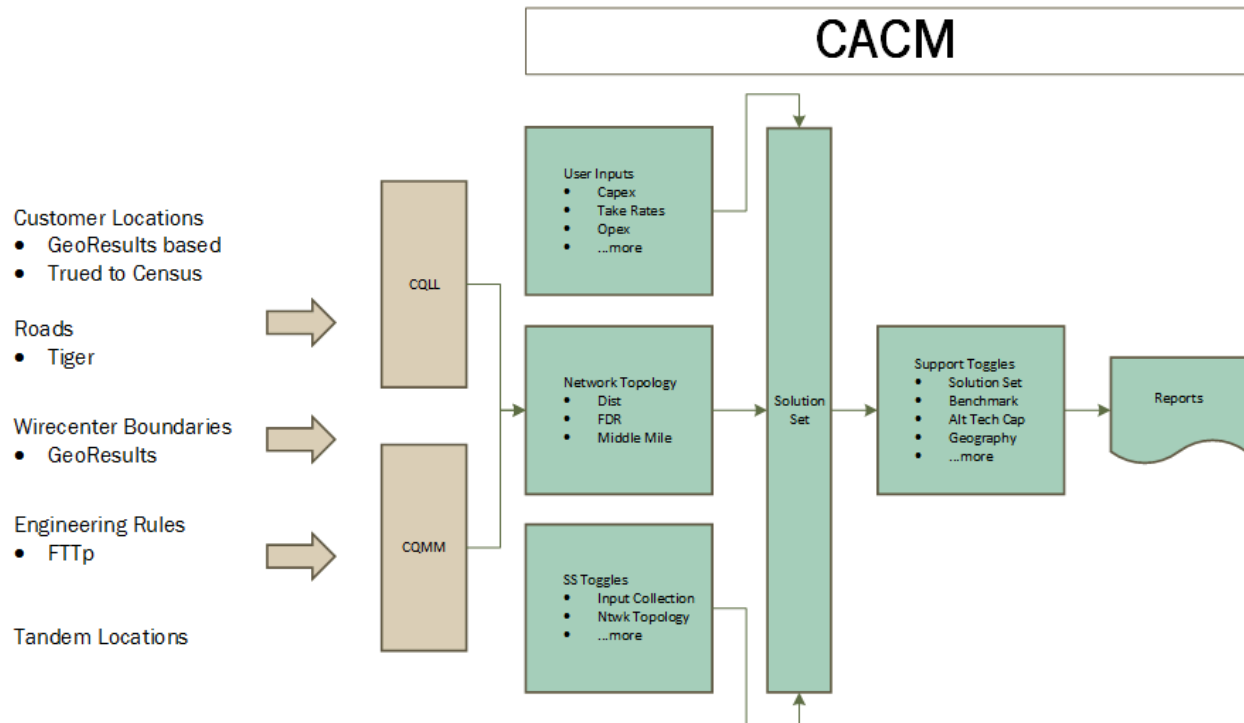


Figure 1--CACM High Level View

The second view (Figure 2) is more of an architectural view. From an architectural perspective CACM can be considered in terms of five distinct yet interrelated components each designed to address a specific modeling function. From a system-logic perspective, across these five components CACM gathers and considers relevant information required to:

- Understand demand,
- Design viable network options,
- Estimate network costs,
- Understand existing broadband coverage and ultimately,
- Explore and assess potential support assumptions.

Also, across the architecture are a set of input options and toggles that provide users with the opportunity to explore a number of different inputs and support scenarios. CACM also includes a reporting function that provides users with a variety of outcome reports and a variety of audit reports.

A schematic of CACM's five architectural components and related functions follows. Abbreviations and terms used in the schematic are explained throughout the Methodology. For example, CQLL refers to the CostQuest LandLine process whereby demand points are connected (modeled) back to a known Central Office and CQMM refers to the CostQuest MiddleMile process whereby Central

Office locations are connected (modeled) to a location where Internet peering can occur . POI refers to a Point of Interconnection, otherwise known as a Central Office.

A third view (Figure 15) is presented in Appendix5 and provides a more detailed view of how CACM sequentially processes inputs and develops reports.

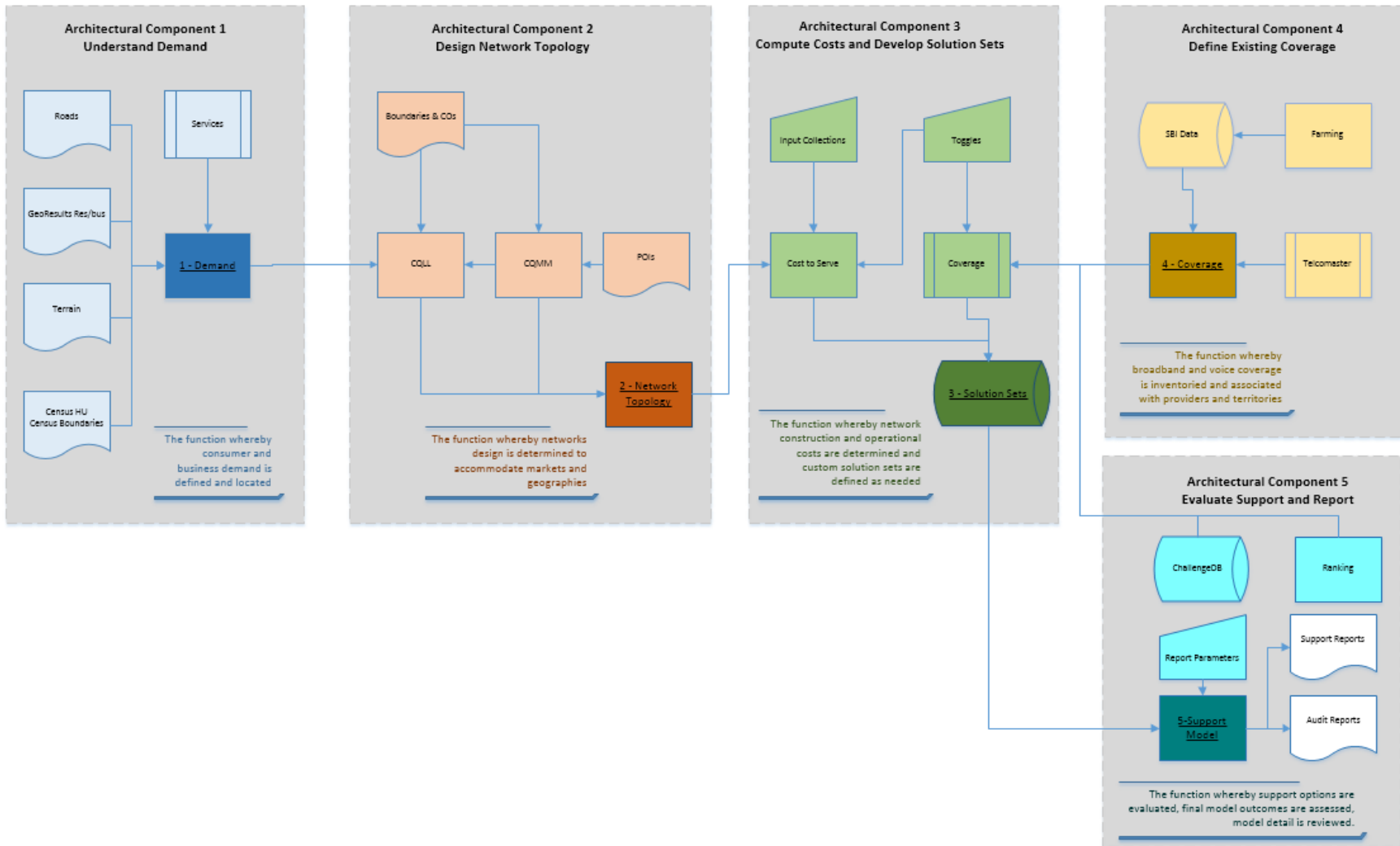


Figure 2--CACM Architecture

The CACM Architectural Components and their function are summarized below and detailed further throughout this Methodology.

1. **Component 1 - Understand Demand:** The function whereby consumer and businesses are located. Results in a representation of potential demand consistent with address level consumer and business information from GeoResults and US 2010 Census data, updated with 2011 Census county estimates.
2. **Component 2 – Design Network Topology:** The function whereby network design is determined to accommodate required service capabilities, demand and geographies. Results in a set of Network Topologies which are consistent with forward-looking network deployments.
3. **Component 3 – Compute Cost and Develop Solution Sets:** The function whereby network construction and operating costs are determined and custom Solution Sets are defined. (Note: outputs from the Cost to Serve Module (i.e., Component 3) represent a unitized measure of costs for comparison among Census blocks and are stored in and referred to as a “Solution Set”. Solution Sets are subsequently used by the Support Module along with specific user parameters to calculate a result.) Results in an estimate of the cost to deploy and operate the Network Designs selected by the user. This component also includes a set of user inputs and toggles which provide users the ability to explore certain cost related input options.
4. **Component 4–Define Existing Coverage:** The function whereby existing voice and broadband coverage is inventoried and associated with deployment technologies, speed and specific geographies. Results in a representation of voice and broadband coverage, drawing on various sources including the State Broadband Initiative (SBI) data development program.
5. **Component 5 – Evaluate Support and Report:** The function whereby support options are evaluated, final model outcomes are assessed and model detail is reviewed. Results in the computation of a universal service support amount based upon parameters (toggles) entered by the user. This component also includes parameters which provide users with the opportunity to explore a variety of support scenarios. Also included in this component are a variety of system outcome and audit reports.

Three of the components (i.e., (1) Understand Demand, (2) Design Network Topologies, and (4) Inventory Coverage) are stand-alone related efforts that are consistent with CACM’s purpose. The other two components (i.e., (3) Compute Costs and (5) Evaluate Support) represent the core of CACM’s internal processing. See discussion and schematic in Appendix 5 regarding CACM processing.

With respect to the two core CACM components, the Compute Costs and Develop Solution Set component (sometimes called the Cost to Serve Module) is a systematized procedure that takes as inputs geographic and non-geographic data and produces an estimate of the cost of providing voice and broadband-capable networks. As such, it provides unitized measures of costs for comparison among Census blocks. The outcome from this component is a Solution

Set. That is, when users create CACM Solution Sets they are interacting with the Cost to Serve Module. Information on running CACM Solution Sets is described in the User Guide.

The Evaluate Support and Report Component (sometimes called the Support Module) takes cost data from the Cost to Serve Module as an input and produces a universal service support amount based upon parameters entered by the user. When users are running CACM Reports, they are interacting with the Support Module. Specific information on running CACM reports is described in the User Guide.

The Cost to Serve Module develops a cost estimate, and the Support Module then takes that cost estimate as an input and allows a user to test different potential universal service support options. The role of the Support Module is to allow a user to see the impact of different universal service funding scenarios. As an example, a user could use a Benchmark and fund all blocks above that Benchmark. Or they could use a Benchmark and a Cap to fund only those blocks between the Benchmark and the Cap. Or, they could use a Cap only.

The CACM architecture (consisting of distinct components each focused on a specific function) enhances the ability of users to understand and view the interactions among inputs, intermediate outputs and support calculations. As an example a user is able to view the network design (the amount of investment, cable distances, plant mix) and middle mile design without corresponding support amounts or support filtered amounts. Not only does this facilitate auditing, but the modularized design also allows a user to segregate analysis away from support decisions versus cost estimation decisions. Modularized design also helps a user study the sensitivity of various cost scenarios (Solutions Sets) relative to an available support amount or support allocation method.

2.3. CACM Processing

Before we turn to a detailed methodology discussion on CACM's five architectural components, it is helpful to also understand the system from a technical processing perspective. The schematic presented in Appendix 6 provides this perspective as it highlights (1) user choices / outcomes, (2) default choices / outcomes and (3) preprocessed databases populated for CACM.

With that as a brief overview of CACM's processing flow, we turn our attention to the methodology employed across the five CACM components.

3 Architectural Component 1 – Understanding Demand

3.1. Introduction

Understanding demand is vital to modeling a realistic telecommunications network. Key elements include the number of consumers and businesses as well as where these potential demand points are located. The following provides an overview of how demand data is developed within the CACM architecture.

3.2. Information Source and Process

For the fifty states and Washington, DC, residential and business data is initially sourced from GeoResults (Q3/2012). Common building locations for residences and businesses are recognized and carried through based on a GeoResults national building file. Using the common building identifier allows the process to keep together residential and business records which share a common building.

As a first step, the address level data were geocoded and associated with the nearest road point to allow a network to be created through spatial programming.⁷ While the GeoResults data were provided with a geocode, all GeoResults' data were re-geocoded using Alteryx version 8.1 to provide a consistent and known source of demand reference locations. For the GeoResults' data, approximately 96% of residences and 94% of business are considered to be well geocoded⁸. Using the resulting geocode, the TIGER 2010 Census Block of every point was identified.

For business data, the GeoResults data were used as the primary source. As such, no data were added or subtracted. For addresses that did not geocode well, the process fell back to GeoResults-provided geocode.

For residential data, while GeoResults data provided the basis for the majority of the locations in the country, the primary source of counts of housing units by Census Block was the Census Bureau's 2010, SF1 Census Block data, which was updated to 2011 counts using the Census Bureau's 2011 county estimates.⁹

As part of the process of creating a complete residential demand data set that is consistent with Census Bureau's counts of housing units, poorly geocoded¹⁰ GeoResults' residential data were first discarded. The well geocoded counts of GeoResults' residential data were compared to Census Housing Unit counts on a Census Block by Census Block basis. For deficiencies, single unit Housing Units were added and assigned a random road location point within the roads of the Census Block. For overages, random GeoResults' residential data were removed. In the end, the Housing Unit counts by Census Block matched the 2011 Census estimated counts.

⁷ Geocoding is a process by which the location on the earth's surface is determined for the address provided. The location is indicated by a latitude and longitude.

⁸ Well geocoded implies that the location is placed upon the appropriate street segment.

⁹ The process to update 2010 census block housing unit counts to 2011 levels either randomly added or randomly subtracted housing units within the census blocks associated with the county. Random in this circumstance means the addition or deletion of housing units was unordered. Each existing point had an equal chance of deletion, for example.

¹⁰ Geocodes are provided at levels of spatial accuracy. Some are specific to a 'rooftop', a specific address or a street segment. These geocodes are useful in the CACM modeling process. Other geocodes are provided at a higher (less specific) level, e.g., to a ZIP level, a city center, etc. These are deemed "poorly geocoded" for CACM purposes and the location of the point is assigned randomly.

In earlier versions of CACM, the residential and business location data were summarized by provided Census Block and then randomly dispersed on livable roads in that block. In Version 3 and later, the re-geocoded GeoResults data were linear referenced to the nearest TIGER road segment,¹¹ and added Housing Units from the Census true-up process were randomly assigned to a road location and resulting linear reference. Because geocoding sometimes bunches points on the segment, the processing also included a rectification step which spreads points out along a segment if they were recognizably bunched/clustered on the segment.

For Puerto Rico, Commonwealth of Northern Mariana Islands (MP) and the Virgin Islands, the location data were sourced in a different manner given the lack of third party data and the ongoing delivery of US Census Block data currently available. For Puerto Rico residential demand, US Census 2010, SF1 data were used exclusively as the GeoResults data did not cover Puerto Rico.

Census Block level data for or MP and Virgin Islands has not yet been released.¹² Census 2000 Block data were used and then adjusted consistent with current territory counts. All residential data were then randomly assigned to road locations within the Census Blocks.

For business demand in Puerto Rico, Mariana and Virgin Islands, 2007 Economic Census data were utilized. These data are provided at the county level and were randomly assigned to road locations within the Census Blocks associated with the county.

The table below summarizes the different sources and vintages of demand used in the CACM model.

¹¹Linear referencing is a process in which the nearest road point of the location of interest (e.g., House) is identified so that the distance along a road segment (e.g., 50 feet along a road segment) is determined rather than using the spatial location of the location of interest (e.g., a residential geocoded address) to measure distances. Network programming is simplified and run times reduced by using linear referencing.

¹² The anticipated release date for MP and VI block level Census counts is prior to the end of 2013.

Table 1--Summary of Demand Sources and Vintages

Area	Fifty States and District of Columbia	Puerto Rico
Primary Residential Location Source	GeoResults 3Q 2012	US Census 2010
Residential True Up Source	US Census 2010, True Up to 2011 County	US Census 2010
Primary Business Source	GeoResults 3Q 2012	Economic Census 2007
Business True Up Source	not applicable	not applicable
Area	Mariana Islands	Virgin Islands
Primary Residential Location Source	US Census 2000, Adjusted to 2010 based on county subdivision estimates	US Census 2000, Adjusted to 2010 based on county subdivision estimates
Residential True Up Source	not applicable	not applicable
Primary Business Source	Economic Census 2007	Economic Census 2007
Business True Up Source	not applicable	not applicable

4 Architectural Component 2 – Design Network Topology

4.1. Introduction

Network cost (and hence, any required Support) is a function of network design. CACM’s network design process is initially informed by an understanding of the demand as determined in CACM’s Component 1. In designing a network topology CACM makes use of CostQuest LandLine (CQLL). Additional detailed information on CQLL and its supporting CostQuest Middle Mile (CQMM) model is available in Appendix 1 and Appendix 2, respectively.

4.2. Overview of Approach

CQLL takes Component 1 demand data consisting of approximately 130 million point located records and using real-world network engineering rules, equipment capacities and spatial realities (road systems and relevant terrain attributes) assembles / designs an efficient forward-looking wireline network. CQLL is a spatial model in that it connects demand data back to known Central Office locations. It measures media (copper cable or fiber optic

cable) along actual road paths and accounts for differences in terrain and demand density. The endpoint of CQLL is a database of network equipment locations and routing required to support voice and broadband-capable networks at a Census Block¹³ or smaller geographic level.

Where CQLL develops a wireline network from the demand point back to the Central Office, CQMM develops the network middle mile topologies between each Central Office in a state to a location where Internet peering can occur. As noted above, additional information on CQMM is available in Appendix 2.

When users create a Solution Set using CACM's Fiber to the Premise (FTTp) network topology, they are loading both CQLL and CQMM derived databases into CACM.¹⁴

5 Architectural Component 3 – Compute Costs and Develop Solution Sets

5.1. Introduction

The function of CACM's third architectural component is to determine network deployment (e.g., construction) and operational costs and to establish custom Solution Sets as warranted by user inputs and system default values.

As noted above, at the heart of this component is the Cost to Serve Module – a systematized procedure that takes as inputs geographic and non-geographic data and produces an estimate of the cost of providing voice and broadband capable networks. That is, the Cost to Serve Module estimates the cost to deploy and operate the Network Topology defined by the second CACM component. As such, the Cost to Serve Module provides unitized measures of costs for comparison among Census Blocks.

Output from the Cost to Serve module (and related coverage data) is referred to as a Solution Set. As discussed later in this Methodology, Solution Sets are used in the Support Module to evaluate support and generate reports.

Based on relevant demographic, geographic, and infrastructure characteristics associated within each identified service area – as well as the service quality levels required by voice and broadband-capable networks – an estimate of (a) build-out investments (Capex sub-module) and (b) associated operating costs (Opex sub-module) are developed for each Census Block.

A key input to the second architectural component generally and the Cost to Serve Module specifically is the Network Design. The Network Design provided by CACM's second architectural component can be thought of as the network schematic. As such it represents a modeled network which is “built” according to real-world engineering rules and constraints.

¹³ In Census 2010, there are approximately 11 million Census Blocks.

¹⁴ Earlier versions of CACM provided a Fiber to the DSLAM (FTTd) in addition to a Fiber to the Premise (FTTp) topology.

As equipment and cable types and sizes are determined from the network schematic and as unit costs (and related costs) are applied, network costs are computed. These network costs include all the costs associated with the construction of the plant, including engineering, material, construction labor, and plant loadings. The resulting costs are driven to the Census Block level based upon cost-causative drivers.

In the current CACM version a voice and broadband-capable Network Design is available.¹⁵

- *Fiber to the Premise* – a design where the entire network from the Central Office to the demand location is entirely fiber optic facilities. In this design, the demand point is within 5,000 feet of the fiber splitter.

In a corresponding component of work within the Cost To Serve module, operating costs (Opex) for service areas are estimated based on certain user-defined criteria (e.g., company size) and certain Census Block-specific profile data (e.g., density). In addition to network driven Opex, operating costs can also be driven by the number of demand locations

In summary, the Cost to Serve Module develops both capital expenditures (Capex Sub-Module) and operating expenditures (Opex Sub-Module) appropriate for the network topology selected.

5.2. Capital Expenditure (Capex) Sub-Module

5.2.1 Build Assumptions and Attributes

A key to any cost model approach is defining the architectural assumptions and design criteria used to construct the network. The following table summarizes key assumptions and design attributes:

Table 2

Category	Assumptions
Overall Design	Scorched node
	Forward-looking
	New network built to all locations
	All service locations have access to voice and broadband-capable networks
	Contemporary / real-world wireline systems engineering standards are used for the modeling of the network. More specifically, industry standard engineering practices are used for wireline deployments.
	Long-standing capacity costing techniques are used to apportion investments reflecting real-world engineering capacity exhaust dynamics down to the Census Block level.
	Network design is based on deployment from known/existing LEC Central Offices (based upon GeoResults Central Office locations).
	The current service providers continue to supply the service area.

¹⁵ Previous versions also provided users with the option of selecting a fiber to the DSLAM design. Specifically, CACM's FTTd option represented a blended copper and fiber design consisting of a subscriber loop of up to 12,000 feet of copper to the DSLAM and fiber from the DSLAM back to the Central Office.

Category	Assumptions
	Smaller companies have the opportunity to join purchasing agreements with other small companies, improving scale economies.
Coverage	Cable broadband coverage currently based on NTIA's National Broadband Map (June 2012), supplemented with FCC Form 477 data
	Wireless broadband (fixed) coverage currently based on NTIA's National Broadband Map (June 2012), supplemented with FCC Form 477 data
Network	Provides broadband-capable networks capable of providing voice and data services
	Voice services provided via cVoIP platform. No Time Division Multiplexing (TDM) investments are present
	No Video equipment (including Set Top Boxes) are installed
	Network is built to a steady state, and results represent a steady state valuation.
	Plant mix will be specific to each state and can be adjusted as part of an Input Collection.
	Apportionment of structure, copper, fiber, and electronics will be based on active terminations. For example, working pairs, fibers per DSLAM, etc.
	The network build (demand used to build the network design) includes special service terminations required by businesses and apportions cost to those services in a consistent manner as used for broadband
	The modeled network ends at the fiber termination on the Cloud; this fiber termination is modeled to an assumed Internet Peering location.

5.2.2 Network Architecture

To understand the model approach and outputs it is also helpful to understand the underlying technologies and the contemporary Gigabit Passive Optical Network (GPON) FTTP deployment.

The schematic that follows reflects the fundamental technology architecture (topology) assumed within CACM. Nodes (e.g., Node 0 thru Node 4) are used to help bridge the understanding of functionality through the selected topology. The “nodes” are significant in that they represent the way in which costs are aggregated and eventually assigned to Census Blocks, if appropriate.

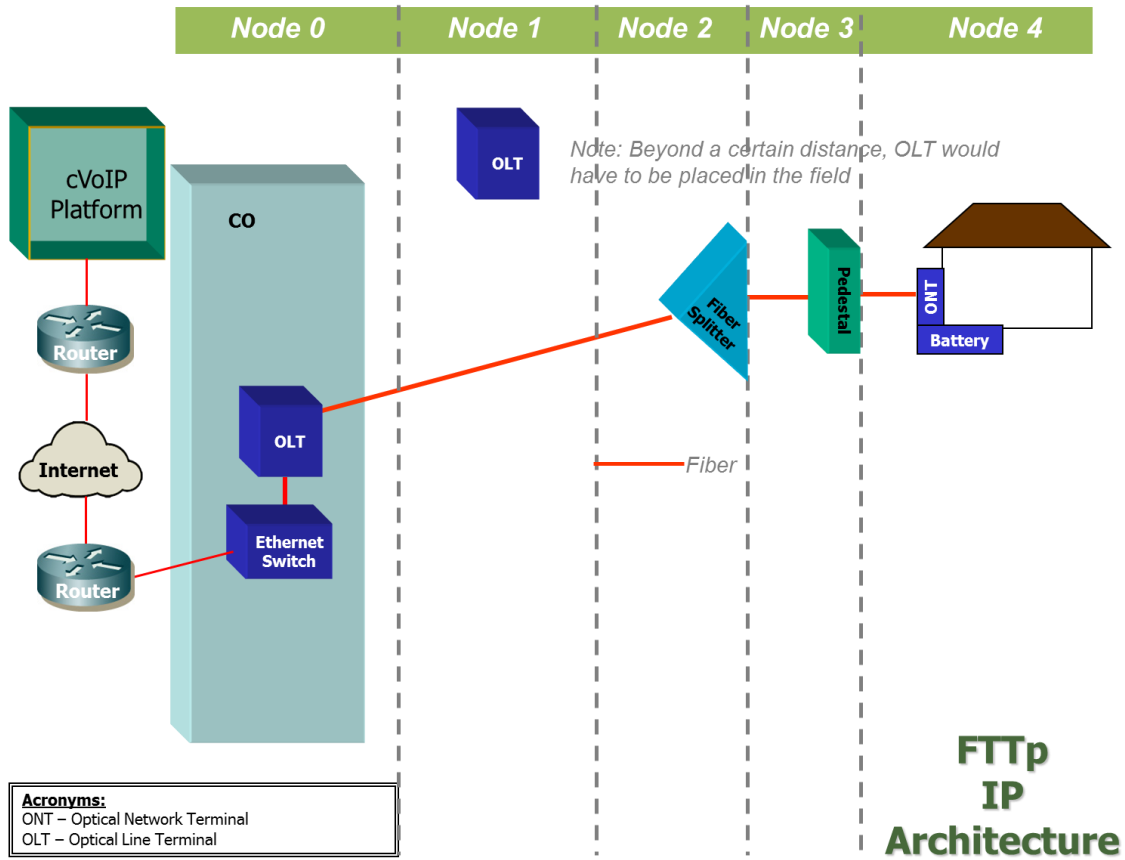


Figure 3-- Fiber to the Premise Architecture

5.2.3 Network Capital Requirement Development

The Capex Sub-Module takes into account demand locations; efficient road pathing; services demanded at or traversing a network node; sizing and sharing of network components resulting from all traffic; and capacity and component exhaustion from the Network Design selected when a Solution Set is created.

The Cost to Serve module develops unit costs, based upon capacity costing techniques. Unit costs address plant, structure, and electronics to support the voice (cVoIP) and broadband-capable network data requirements of the designed network.

The voice and broadband-capable network is broken into two key components: loop and middle mile. Additional information on how each component was modeled is provided in Appendices 1 and 2.

The loop portion captures the routing of network facilities from the demand location up to a serving Central Office. This routing captures both the “last mile” (facilities from the demand location to the serving Node2) and the “second mile” (facilities from the Node2 to the Central Office).

The middle mile portion captures what one might typically refer to as the interoffice network or transport. It captures the routing from a Central Office to the point at which traffic is

passed to “the cloud.” Within CACM, the connection to the Cloud occurs at a regional tandem (RT) location within a state.

The following discussion provides an overview of how the two components of the voice and broadband-capable network are developed.

5.2.3.1 The Loop

CACM employs CostQuest Associates’ industry recognized CQLL Economic Network model platform to design the network. That is, CACM accepts as inputs network topologies produced by components of CQLL. These files include the distribution (last mile) and feeder topologies (second mile) of the wireline network. The CQLL methodology is discussed in further detail in Appendix 1 to this document.

At a high level, CQLL is a modern “spatial” model that identifies where demand locations exist and “lays” cable along the appropriate (most efficient path) roads of a service area. As a result, a cable path that follows the actual roads in the area can literally be traced from each demand location to the serving Central Office.

From the output of CQLL, a network topology is built that captures the equipment locations and routing required for delivery of voice and broadband services to an entire service area. Within the CACM Capex logic, the network topology is sized to determine appropriate cable and equipment and then combined with equipment prices, labor rates, contractor costs, and key engineering parameters (e.g., equipment capacities appropriate for demand) to arrive at the investments required.

The Capex Sub-Module uses the Network Topology as the basis for a logical economic scorched node build given the technical parameters required for a voice and broadband-capable network.

5.2.3.2 CQLL Service Assignment

Incumbent wireline carriers often have an obligation to provision new service within a short period of time. As such, significant components of wireline networks are engineered to meet residential and business service demand within a serving area in recognition of this obligation. That is, certain components of wireline networks are typically built and sized to serve all locations. Service location data are, therefore, key drivers of the network build and instrumental to reliability of the results. The Cost to Serve Module generally and the Capex Sub-Module specifically recognize this operational reality.

As noted above, CQLL is populated with data that incorporate various types of business locations in addition to Census-true residential locations. Based on this road-located customer location data set, CQLL then created the network topology required by customers and their associated service requirements.

The following table outlines the provisioning option for each customer type:

Table 3

Market	Segment	Employee Count	Provisioning Option
Residential	not applicable	not applicable	Broadband
Business	Technology Oriented Business (NAICS code>50000)	<10	Broadband
		>10	Special Access fiber ¹⁶
	All Other Business		
	(NAICS < 50000)	<10	Broadband
		>10 < 50	Broadband
			Special Access fiber
		>50	Special Access fiber
Other	Wireless Towers and Community Anchor Institutions	not applicable	Special Access fiber

Once the network topology is designed, the network facilities associated with the build out are associated with each provisioning option (broadband, Special Access fiber) based upon cost-causative drivers or through an appropriate attribution and assigned to the subscribers in the Census Block.

Only the facilities (or portions thereof) associated with voice and broadband services are extracted from the CQLL results and pulled into CACM. As such, the network topology captures the full build of a typical voice and broadband provider, and only the portion of the network build associated with broadband provisioning is captured in the CACM results. This separation is described in the following section

5.2.3.3 Allowance for Special Access Demand

To account for the impact of Special Access demand on the network and on the cost allocation to the broadband-capable network, demand from wireless towers and community anchor institutions (CAI) is captured and modeled as Special Access service demand. In addition, based upon the size of a business and its NAICS category, the model deploys Special Access fiber to a business location. Collectively, these services represent the Special Access demand included in the modeling effort.

The additional fiber which comes from the CAI / Towers or business locations are used in concert with the previously noted demand data to size the total network. The cost of the total network is then attributed to the services based on capacity drivers (e.g., fiber strands, etc.). The cost driven by the fiber strands for these Special Access services are excluded in the cost to serve calculations in CACM. In other words, costs are shared where structure and fiber is shared between the broadband and the Special Access networks. If structure and media are dedicated solely to the Special Access demand, that cost is excluded from the cost to serve calculations. In addition to the exclusion of the cost associated with the Special Access locations, when unitizing total cost in a block within CACM, these Special Access location counts are not used.

¹⁶ For the purposes of this discussion, Special Access includes private line and direct Internet Access as well

For the middle mile portion of the network, a user adjustable percentage of the cost for structure is assumed for the transport of Special Access demand. In other words, only a portion of the middle mile structure investment is assumed to be driven by the cVoIP and broadband network.

5.2.3.4 Voice Costs

CACM v2 introduced voice capabilities along with the broadband network. Voice services are provided using carrier grade Voice over Internet Protocol (cVoIP).

Investments to support voice capabilities are presented to the model on a per unit of demand basis. The typical cVoIP network consists of the following components. For modeling purposes the functionality presented in the following figure is categorized into hardware, software and service categories.

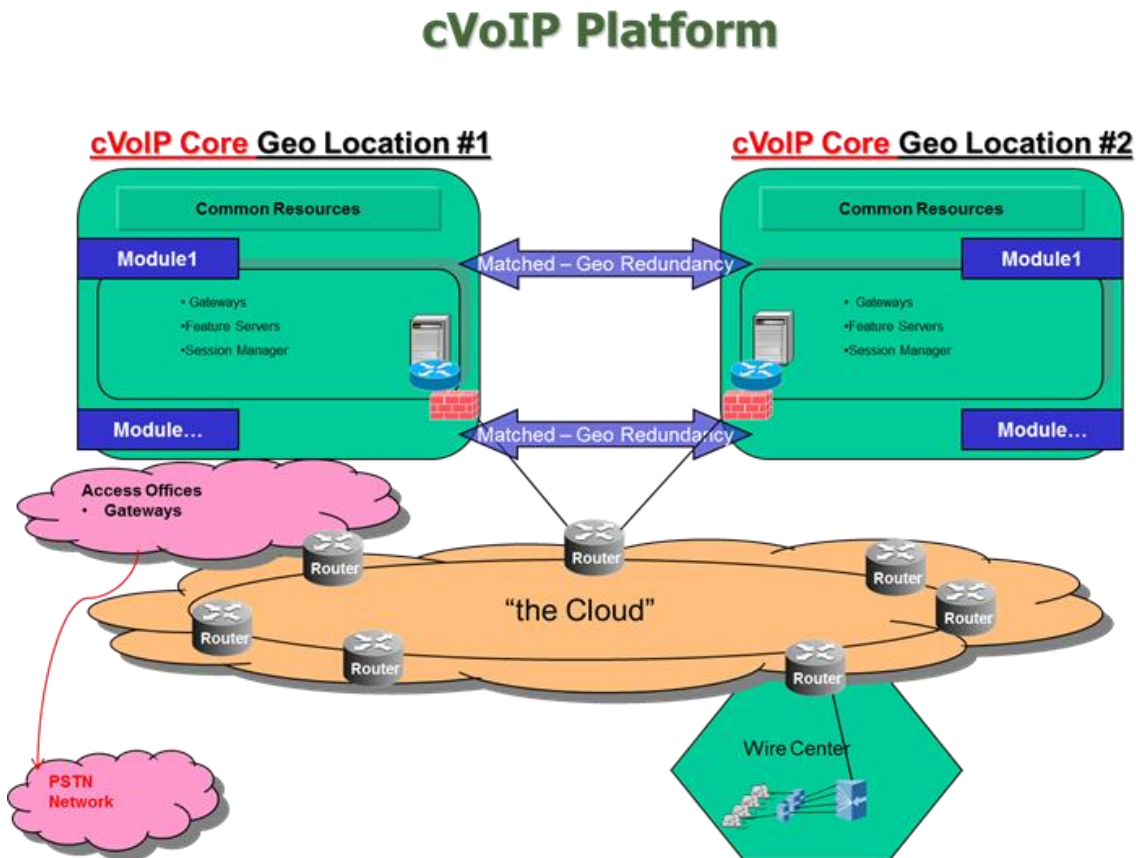


Figure 4--Carrier Grade VoIP Platform

The basic function of IMS/Softswitching sites depicted above is to provide routing information for the voice packets and to provide the calling features for the customer. The IP Multimedia Sub-System (IMS)/Softswitching platform is typically deployed as a national architecture that supports multiple states with one or more paired core sites that contain modules sized to meet demand required and multiple access sites that interconnect with other carriers that feed into the core sites.

Consistent with CACM’s use of CQLL to model first and second mile network topologies, CACM employs CQMM (Middle Mile) to design the connection between Central Offices and “the Cloud” at what is typically called an Internet Gateway. The CACM middle mile topology connects a Central Office to a point of interconnection at a Regional Tandem within the state. Efficient high-capacity Ethernet routes are created to move traffic from Central Offices to the location of existing access tandems.

5.2.3.5 Middle Mile

The approach used to determine the middle mile equipment required – and then to compute the related investment costs – is centered in the spatial relationship between the Central Office and the nearest access to a Tier 3 Internet Gateway tandem. A surrogate for such access is assumed to be on a Regional access Tandem (RT) ring within the state.

This approach starts with obtaining the location of each Central Office – also referred to as Point of Interconnection (“POIs”) and/or Node0 – from the GeoResults Central Office database. The result of this approach aligns the Central Office/Node0 locations used in the underlying CQLL model’s network for the local loop.

Regional tandem locations (and the relevant feature groups deployed) are obtained from the LERG ®database. Each tandem identified as providing Feature Group D access in LERG ® 7 is designated an RT. As with Central Offices, a latitude and longitude is identified for each RT.

The underlying logic (and the process) of developing middle mile investment requirements are grounded in the assumption that the Internet Gateway peering point is located on the RT ring – meaning that if the modeled design ensures each Central Office is connected to an RT ring, the corresponding Node0 customers all have access to the Internet.

Additional material on the logic used in CostQuest’s Middle Mile model is available in Appendix 2.

5.2.3.6 Capex Cost Considerations

It is important to understand three real-world factors that improve the computation of Capex in CACM at the Census Block level. The cost factors considered are presented in the table that follows:

Table 4

Modeling Issue	Design Logic Employed
Terrain	The Capex Sub-Module is sensitive to terrain characteristics faced in wireline construction via the use of a driver to account for varied construction costs. The model gathers terrain characteristics including depth to bedrock, depth to water, rock hardness and soil type.
Density	The Capex Sub-Module is sensitive to aggregate density of a Census Block through multiple factors, including user quantity driven wireline costs and scaled backhaul (second and middle mile) costs based on aggregated demand in a given serving area. Density in the model is based upon the area and number of locations in each Census Block Group.

Modeling Issue	Design Logic Employed
Region	The Capex Sub-Module adjusts for regional cost differences in material and labor costs. This is controlled by the RegionalCostAdjustment user controlled input.

Terrain/soil conditions and density affect Underground Excavation costs and Buried Excavation costs. Each of these cost elements have cost inputs specific to the type of soil condition (Normal, Soft Rock, Hard Rock or Water (i.e., high water table) and the density of the area. Based upon soil/terrain and density information associated with each plant element, the model uses the relevant associated Capex cost input to estimate the cost of structure placement in the specific soil type and density in which the structure is being placed. In other words, as an output of the Network Design each plant element has an associated terrain and density attribute. Based upon the terrain attribute, the appropriate investment lookup is made.

5.2.3.7 Terrain Factor Development

To support cost sensitivity driven by terrain factors, a terrain by Census Block Group (CBG) table was developed.

For the contiguous states, Puerto Rico and Alaska, the terrain by CBG table was sourced from Natural Resources Conservation Service (NRCS) STATSGO data.¹⁷

For VI and MP, SSURSGO data was used.

In both cases, the following attributes were used:

- Bedrock Depth
- Rock Hardness
- Water Depth
- Surface Texture

The Bedrock and Water Depth for each Census Block Group represented the area weighted average of each STATSGO/SSURSGO Map Unit relative to the Census Block Group. The Rock Hardness used was the most frequently occurring value. When developing the Terrain by CBG table, the sum of all STATSGO MapUnits had to cover at least 20% of the Census Block Group to be represented in the calculations. In the case where no STATSGO or SSURSGO data elements covered at least 20% of the CBG, values were filled as NULLS.

Based upon the depth to bedrock, water and the rock hardness assignments to Hard, Soft, Normal and Water terrain types were made. With these assignments made on each plant element, appropriate terrain driven inputs are applied by CACM.

5.2.3.8 Density Development

Since CACM version 2, density is measured at the Census Block Group level and based upon the sum of locations in the Census Block Group divided by the area of the Census

¹⁷ Data extracted from, <http://soildatamart.nrcs.usda.gov/>. Website deactivated 4/24/2013. .

Block Group. The resulting numerical value is then translated into Urban (above 5000/sqmi.), Suburban (above 200/sqmi.) and Rural.

5.3. Operational Expense (Opex) Sub-Module

The CACM Opex Sub-Module estimates wireline telecommunication operating expenses incurred in provisioning voice and broadband in service areas by company size and by density. The CACM Opex Sub-Module is applied to Census Block profiles with consideration of coverage requirements defined by a set of user assumptions and investments.

The CACM Opex cost profiles are presented within a hierarchy of costs referred to as the CostFACE. From the highest level in the hierarchy down, the CostFACE is comprised of the following:

- F – Cost **F**AMILY (e.g., Network vs. Customer Operations vs. General and Administrative)
- A – Cost **A**REA (e.g., Plant Specific vs. Plant Non-Specific)
- C – Cost **C**ENTER (e.g., Cable & Wire vs. Circuit Equipment vs. Switching)
- E – Cost **E**LEMENT (e.g., Copper Aerial v. Fiber Aerial v. Copper Buried v. Fiber Buried)

The purpose of the CostFACE is to organize and align operating costs with relevant cost drivers (e.g., associated Capex investment and demand¹⁸).

The model input is organized in a set of static tables made available to CACM for purposes of aligning the selected operating costs to the selected provider type, size, and density based on cost drivers, such as investment or service locations.

To provide estimated operating expense for the difference in operating characteristics noted above, relevant provider data available within the public domain were gathered and analyzed to develop a set of baseline cost profiles and a corresponding set of factors or cost functions designed to adjust the baseline views by provider size and density. These publicly available values were then validated against proprietary data provided by ABC Coalition members.

The steps in the operational cost development process vary by provider size, but are summarized generally below:

- Research and gather operating expense data;
- Segmentation of data into uniform expense lines;
- Analysis of data;
- Identification of appropriate CACM Opex Sub-Module cost drivers based on best available data;
- Development of baseline Opex detail;
- Development of factors for size and density adjustments;
- Development of property tax location adjustments; and

¹⁸ The term demand is used to reference both working and non-working locations on the network. In the past subscribers was used synonymously (to represent all network demand locations) but some readers were confused by that reference. Therefore, demand is used in this document to represent both working and non-working locations.

- Validation and revalidation of results.

5.3.1 Opex Assumptions

Developing a forward-looking cost model which includes operational expense functions is complex. What you are trying to do is develop a forward-looking Opex value for a network which may not yet be in place over the assumed geographic scope of the network.

To accomplish this, existing data sources must be examined, potentially comingled and compared across a number of dimensions to yield a relevant estimate of Opex.

There is no existing readily available source for detailed cost by technology by operating cost category, by geographic area, by density which is aligned with accessible cost drivers. This is the type of information that is needed in a forward-looking modeling effort. Rather, there are a limited number of relevant data points found across an array of information sources. This implies that developing data sources which are inputs into CACM processing will be complex. The quality standard by which the CACM inputs were evaluated was their consistency among company sizes, consistency with prior forward-looking results, and comparability to proprietary data sources, if those sources are available.

The process to develop the CACM inputs to the Opex sub-module relies on certain assumptions and limitations that constrain the absolute predictability of the Opex Sub-Module, as listed below:

- a) Industry-reported financial data are reasonably accurate and sufficiently segregated to develop Opex drivers to model operating expenses at geographic granular levels (i.e., Census Blocks);
- b) Varying formats and expense-detail levels of publicly available financial data can be reconciled to provide compatible detail;
- c) Compilation of publicly available information can be analyzed using regression equations, averages, and other acceptable analysis derived from industry information to derive baseline Opex detail;
- d) Resulting unitized baseline expense detail can be modeled against CACM forward-looking cost drivers to approximate reasonable estimates of Opex for selected provider, size, and density characteristics;
- e) Historic financial data comprised of mixed technological generations can be adjusted to predict the operating expense of deployed new technology; and
- f) Varying types of expense detail can be validated against industry or company-specific data.

5.3.2 Sources of Information

The following information sources were the primary sources from which the Opex data were derived, analyzed, and tested/validated:

- FCC ARMIS Data
 - Pulled from: FCC Report 43-01 for 2007 and 2010
- NECA Data
 - Pulled from: <http://transition.fcc.gov/wcb/iatd/neca.html> for 2006-2010
 - Section: “**Universal Service Fund Data: NECA Study Results**”
- Thomson Reuters’ Checkpoint/RIA
- Wolters Kluwer’s CCH (Commerce Clearing House)
- Comments filed in National Broadband Plan docket
- Telecommunication Carriers Public Financial Statements 2009-2010
- Standard & Poor’s Industry Surveys: Telecommunications: Wireline, April 2011
- Business Monitor International, United States Telecommunications Report, Q1 2011
- Morgan Stanley, The Mobile Internet Report, December 15, 2009
- R.S. Means, Building Construction Cost Data 69th Annual Edition (Massachusetts: R.S. Means Company, Inc. 2010)
- Marshall & Swift, Marshall Valuation Services (U.S.A.: Marshall & Swift/Boeckh, LLC, 2010)
- Certain proprietary and third party information, including data provided by the ABC Coalition

Additional information regarding Opex development is available as a presentation posted to the Resources section of the CACM website-- Opex Overview.zip.

5.3.3 Development of Opex Factors

The sections that follow provide an overview of the methodology used to develop the CACM Opex Sub-Module factors and related adjustment factors for the various FACE elements.

The table immediately below shows the detail operating cost functions that are represented in each level of the CACM FACE.

Table 5

FACE Primary Level	Second Level	Third Level
Network Operations Expense	Plant Specific	Outside Plant Cable by Cable Type Poles Conduit Circuit / Transport
	Plant Non-Specific	Network Operating Expense General Support and Network Support
General and Administrative	n.a.	n.a.
Selling and Marketing	n.a.	n.a.
Bad Debt	n.a.	n.a.

5.3.3.1 Network Operations Expense Factors

To estimate the CACM Network Operations Expenses, the relationship between capital investment and ongoing cost to operate and maintain the plant was determined.

This determination relied primarily on three years of NECA data (2008-2010), supplemented with additional data sourced from ARMIS and third party sources¹⁹. These NECA data report operating expenses, Investment by Plant Type in Service (IPTS), and Total Plant in Service (TPIS) amounts for companies across common USOA Part 32 accounting categories CO Transmission and Circuit Equipment, and Cable & Wire accounts.

These data were further categorized with a size variable using the NECA reported line counts.

A NECA rural classification was overlaid on the company size data. In addition, the cable and wire accounts were broken out into Aerial Cable, Buried Cable, Conduit, Poles, and Underground Cable using industry data percentages of distribution plant (e.g., Opex & Plant Investment) pulled from ARMIS.

Finally, the data were unitized on a per-loop basis to facilitate the validation/testing of the results by company size and density.

Development of the network operations expense investment-based factors relied on NECA data (2008-2010), segregated by company size and density. Two analytic paths were investigated. The first was a regression analysis to develop Opex regression coefficients. The second was a mean analysis to develop the median and average Opex / IPTS factors per loop. The mean analysis was used.

The median and average operating expense to plant investment per loop were determined and were then averaged to derive the NECA-based Opex to Plant Investment factor.

These results were then adjusted from a historical cost basis to a contemporary topology-specific network build on a forward-looking cost (“FLC”) basis, resulting in the baseline CACM Opex Sub-Module factors. Once model output was available, the scaling was revisited to ensure that forward-looking opex values did not exceed NECA-based Booked Opex that were derived by applying the initial NECA-based Opex to Plant Investment Factor to the weighted average NECA-based plant investment per loop which resulted in the annual operating expense per loop by company size and density.

From these data, cable CACM Opex Sub-Module factors were further segregated between metallic and non-metallic to account for the significant operating differences between the two types of cable using proprietary data sources. Finally, a large company baseline view was extracted based on the cost categories discussed in the Cost Face format illustrated above. Factors were then derived to adjust for size, density, and location.

5.3.3.2 General and Administrative Operating Expense

To calculate the CACM General and Administrative (“G&A”) Opex sub-module factors, a regression analysis was employed using five years (2006 - 2010) of NECA G&A Opex

¹⁹ These third party sources include material provided by the ABC Coalition companies.

(dependent variable) and Total Plant in Service (“TPIS”) (independent variable) data segregated by company size to determine the relationship between total plant investment and G&A operating expenses. Using the same type of NECA investment data unitized on a per loop basis as used in the network operations analysis, FLC G&A Opex Component factors per loop were developed by company size and by density using a regression equation. Comparing the contemporary G&A Opex Component factors to the regression parameters resulted in a set of FLC to historical G&A adjustment factors by company size and by density. Applying these adjustment factors to the regression parameters resulted in the CACM G&A Opex Component factors by company size by density. The Large Company baseline results were then validated by comparing them to G&A operating expense data provided by the ABC Coalition companies.

5.3.3.3 Customer Operations Marketing & Service Operating Expenses

To determine the CACM customer selling and marketing (“S&M”) Opex Sub-Module factor, the effort employed publicly available ARMIS data and ABC Coalition company data. Based on the ABC Coalition company data, overall S&M costs were estimated as a percent of total operating revenue. In addition, a review of the latest ARMIS data available for large incumbent local exchange carriers (“ILECs”) (2007) and mid-sized ILECs (2010) indicates S&M operating expenses are 12.97 percent of all ARMIS reported revenue. Both percentages were averaged and applied to the assumed ARPU of the CACM service(s) to derive the CACM S&M monthly operating expense per customer.

An analysis of ARMIS data also indicates that 41 percent of the S&M per customer is attributable to marketing with the remaining 59 percent associated with “Customer Operation Services”.

5.3.3.4 G&A Opex Property Tax Location Adjustment

Property taxes are typically a subset of the G&A operating expense. Property taxes, which are based on the value of the property owned by the taxpayer in the taxing jurisdiction as of a particular lien date, vary by state and, to some degree, by taxing authority within each state. As such, location-specific property tax indices to be applied to the G&A Opex Component factors were developed.

To develop the location-specific indices, total corporate operations expenses (G&A plus Executive & Planning) and the net plant in service, based on the NECA data, were summarized by state. The effort then developed the average property tax levy rates by state. Applying these levy rates to the net plant in service (e.g., proxy for the taxable property tax value) resulted in the implied property tax expense by state. Comparing these figures to the overall national weighted average property tax levy rate, property tax indices by state were developed. Applying these indices to the G&A operating expense adjusts for location-specific differences in property taxes.

5.3.3.5 Bad Debt Expense

The CACM Bad Debt Module expense is applied on a per unit of demand basis and was estimated based on using a revenue derived bad debt factor and an assumed ARPU. The bad debt factor as a percentage of all reported revenue was based on a review of industry-specific 10K’s and industry knowledge.

5.3.3.6 Validation

The accuracy of the CACM Network Opex Sub-Module factors was tested by applying them to the estimated CACM Capital Investment Module factors per loop and comparing the results to the NECA network operating expenses per loop by company size and by density.

The CACM operating expenses per customer output by cost element also were reviewed for differences in density, technology, and other factors. General and Administrative and Selling & Marketing expenses also were validated against data reflecting the provisioning of cVoIP and broadband services.²⁰

As presented below, CACM’s non-network related operating costs follow a consistent pattern across company size and under different take rates. The values shown in the illustration are consistent with CACM baseline inputs (except for take rate variance). The values are intended for illustration only.

		Large	Medium	Small	x-Small	xx-Small
FTTd, 90% take	CustomerOperationsMktOpex	\$ 5.93	\$ 5.93	\$ 5.51	\$ 7.35	\$ 9.95
	GenAdminOpex	\$ 4.00	\$ 6.02	\$ 13.44	\$ 28.17	\$ 45.82
	BadDebtOpex	\$ 0.92	\$ 0.92	\$ 0.92	\$ 0.92	\$ 0.92
	Total	\$ 10.85	\$ 12.87	\$ 19.88	\$ 36.44	\$ 56.69
FTTd, 80% take	CustomerOperationsMktOpex	\$ 5.93	\$ 5.93	\$ 5.51	\$ 7.35	\$ 9.95
	GenAdminOpex	\$ 4.41	\$ 6.68	\$ 15.04	\$ 31.56	\$ 51.36
	BadDebtOpex	\$ 0.92	\$ 0.92	\$ 0.92	\$ 0.92	\$ 0.92
	Total	\$ 11.26	\$ 13.53	\$ 21.47	\$ 39.84	\$ 62.23

5.3.4 Operational Cost Sub-Module Conclusion

As the Cost to Serve module completes its processing, the model captures the average monthly cost of service per customer for each of the over 11million Census Blocks in the country. This monthly cost includes the monthly operational costs and the capital related monthly cost of depreciation, cost of money and income taxes. These capital costs are developed through the application of levelized annual charge factors applied to the Capex that is developed by the model. As described above, the output of the Cost to Serve module is stored in and referred to as a “Solution Set.” Solution Sets are used by the Support Module along with specific user parameters to calculate a result.

5.4. Cost To Serve Processing Steps

From an implementation perspective, the computation of Architecture Component 3’s Capex and operating costs (Opex) is accomplished in CACM through the steps in Table 6. The steps are described below but processing source code is available to interested users.

²⁰ Output was also compared to confidential, actual data where those data were available.

The System Evaluator version of CACM (CACM-SE) allows users to view resolved processing code and step through each of these steps viewing calculations, updates to tables and report definition files.

Table 6

Step	Description	Comments
0	Prepare Coverage	Prepares coverage table using base coverage, augmented with available coverage and challenge coverage if available for each technology.
1	Initialize Solution Set	Creates the Solution Set entity that will frame the computations to follow and hold results when completed.
2	Update CT Density	Calculates Census Tract Density to be used in a later calculation.
3	Define distribution network	Establishes the consumer and business customer counts and related distribution network topology.
4	Estimate demand	Develops consumer and business demand based on take rates.
5	Determine bandwidth throughput requirements	Develops bandwidth throughput required based on consumer and business demand determined in previous steps
6	Not Used (see Note)	
7	Determine Demand at DSLAM or Fiber Splitter	Develops data important to the sizing of Node2 investments (i.e., at the DSLAM or Fiber Splitter)
8	Create intermediate Capex table	Develops and incorporates defining network cost drivers such as terrain, density, company size and location, tax rates, etc.
9	Develop Capex for distribution and feeder	Updates the Solution Set with investment required for the Distribution network (i.e., from Node0 through Node4)
10	Develop Capex for Middle Mile	Updates the Solution Set with capital investment required for the Middle Mile (i.e., from Node0 to Node00)
11	Develop Investment Related Opex	Updates the Solution Set with investment related Opex and pre-stages the computation of full operating costs
12	Develop Non-Investment Related Opex	Updates the Solution Set with non-investment related Opex including adjustments for regional cost and property tax differences)
13	Populate Solution Set	Completes the Solution Set and makes it ready for use in the Support Module
Note	Other Comments	This table presents the processing code steps as used in the current CACM release. The full system code includes certain steps that are inactive for CACM processing (e.g., certain previously employed user selection alternatives for estimating demand, certain steps relating to the development of ARPU, etc.).

6 Architectural Component 4 – Define Existing Coverage

6.1. Introduction

The function of CACM’s fourth component is to inventory existing voice and broadband coverage and associate that coverage with providers and specific geographies. The outcome from this component is a preprocessed coverage database that is derived from the National Broadband Map and FCC Form 477 data. The coverage database informs CACM as to what broadband technology is currently serving a Census block as well as what Maximum Advertised Downstream and Maximum Advertised Upstream speeds are available in that

block. The combination of a broadband technology and the speed in which it is available determine if a Census block is served by a particular technology.

6.2. Information Source and Process

Broadband coverage information, specifically the speed and technology available in each Census block, currently is sourced from National Broadband Map round 6 data (based on June 2012 data and released February 2013). National Broadband Map data are updated every six months as part of the NTIA State Broadband Initiative (SBI).

The derivation of the coverage data used in CACM started at the Census block level by examining each distinct technology group, maximum advertised downstream and maximum advertised upstream speed record by provider.

Within this process, the SBI Technology of Transmission codes were used to develop technology groups as follows.

- Telco broadband includes SBI Codes 10, 20 and 30
- Fixed Wireless includes SBI Codes 70 and 71
- Cable includes SBI Codes 40 and 41

Excluded codes are 60 (satellite), 80 (mobile wireless), 90 (BPL) and other (0).

SBI Cable and Fixed Wireless providers who do not report Local Exchange Telephone or Interconnected VoIP (Part II, reported at the state level) on FCC Form 477 State Filers report, available at http://www.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/IAD/statefilers0612.xls were removed from coverage.

Once the technology groups were available in each block, a ranking process was developed to determine the available (i.e., maximum advertised) speeds. The speed ranking prioritized broadband coverage in a block if that technology group record covered at least 20% of the Census Block. For records with less than 20% coverage, the coverage was only used if there are no other providers in the block.

The next step categorized the broadband advertised speed category of each coverage record into bands.²¹ Band labels (e.g., Good, Better, Best) are a function of both download and upload speeds expressed in Mbps. The NTIA speed codes are categorical. A sample of an NTIA category runs from 768 Kbps to less than 1.5 Mbps. To translate the categories into a speed value we use the bottom of the NTIA category. As an example, the 768 Kbps to 1.5 Mbps category is assigned a value of 0.768 Mbps. Given this, the process starts at the Best category and decrements, examining each Census block, provider / speed / technology combination, assigning the value to the first rank category judged true.

- Best: Download at or above 10 and upload above 1.5

²¹ A coverage record in the NTIA National Broadband Map data represents a single carrier's technology of transmission and speed within a Census Block.

- Better: Download at or above 6 and upload at or above 1.5
- Good: Download at or above 3 and upload at or above 0.768
- Poor or Null: Download under 3 and/or upload under 0.768

With the bands of each Census Block identified, the process then picked the top band available within the Census Block. Within the top band, if there is a tie, the process picks the best available speed, using the record with the superior upload speed.

The resulting ranked speed assignment by technology group by Census Block is then imported into the CACM Solution Set.

As part of CACM release, the broadband speed by Census Block is used to determine the appropriate threshold to determine if a Census Block is served or unserved by technology.

In addition, CACM allows for the augmentation of the coverage data through either a challenge process or augmentation data set.

7 Architectural Component 5 – Calculate Support and Report

The function of CACM’s fifth and final component is to allow users to compare support options, view final model results and review / audit model detail. Sometimes referred to as the “Support Module” this component includes a mathematical procedure that takes cost output (Solution Set) data from the Cost to Serve module as an input and produces a universal service support amount based upon parameters set / entered by the user.

Once the Cost to Serve Module has run, a large amount of information is available for analysis and decision making. As described earlier, the Support Module takes the output (Solution Set) from the Cost to Serve Module along with user-defined parameters to calculate a result representing universal service support specific to the user request. The Support Module examines the granular cost information and calculates those areas requiring support given a specific set of parameters.

7.1. Factors that Determine Support

A few of the critical considerations in determining high-cost universal service support amounts and included in the Support Module are:

- geographic unit for estimating costs averaging criteria (targeting);
- eligible blocks for funding based upon the presence of an alternative (unsubsidized) voice and broadband provider,
- benchmark above which Census Blocks are eligible for support;
- threshold above which Census Blocks are not eligible for support, which may be better served by an alternative technology; and
- overall cap on total funding

Once the user selects the appropriate support attributes and associated values, CACM reporting will provide a summary of the funding requirements based on the user’s selections.

Irrespective of the user's choices, keep in mind that the coverage filters, cost and support calculations are always performed at the Census Block level and rolled up to the user's specific request.

7.2. CACM User Controlled Reporting Parameters and Output Descriptions

The following terms are used on the Support Module interface. Cost and Total Funding amounts specified are in dollars per month, unless noted otherwise. Definitions are provided below.

Target Benchmark - The cost benchmark to which a candidate area's per unit cost is compared to determine where funding is required. Locations with cost per demand unit below the target benchmark are excluded from the support calculation, and the value of the target benchmark is deducted from the support amount for locations with cost per demand unit above the target benchmark.

Alternative Technology Cutoff – The input value representing the support limit or alternatively the cost increase over the Target Benchmark. If the candidate area's cost per unit is greater than the Target Benchmark plus the Alternative Technology Cutoff, the number of service locations in the candidate area is excluded from support and presumed to be served by and voice and broadband technology, such as satellite. A similar term, Alternative Technology (Cost) Threshold represents the entire cost threshold. In other words, Alternative Technology (Cost) Threshold equals the Alternative Technology Cutoff plus the Target Benchmark. The Alternative Technology Cutoff can be modified in CACM. Alternative Technology (Cost) Threshold is a descriptive term used in other documentation.

Monthly Support Funding Cap – This is a cap on the monthly support available for a candidate area. For demand whose costs are beyond the Benchmark plus Monthly Support Funding cap, the support (support is defined as the amount of cost exceeding the benchmark value) for the subscriber is limited to the Monthly Support Funding Cap. This value is entered as a per unit of demand value. In other words, if you wish to limit support to no more than \$200 per month per location, set this value to \$200. This value is intended to be a substitute for the Alternative Technology Cutoff. We do not recommend using both in a Support Module calculation.

Mark with Provider– A reporting filter available for users, wherein reporting results shown are only those of the company associated with that user account. **Note:** This is only applicable to users who are logging in and belong to a company that has a short name defined.

Cable Unserved – Used to include or exclude cable served areas in the analysis. Setting this value to false will allow Cable Served blocks to be eligible for support.

Wireless (Fixed Wireless) Unserved – Used to include or exclude fixed wireless served areas in the analysis. Setting this value to false will allow Fixed Wireless Served blocks to be eligible for support.

Rate of Return/Price Cap – A parameter used to show either Rate or Return (ROR), Price Cap (PC) or both provider types simultaneously in a given report. Average Schedule and Rate of Return affiliates of Price Cap companies are treated as Price Cap in this filter.

Unitize Cost By – A toggle used to determine how cost is unitized. Total Cost can be unitized by either a take rate impacted demand (sometimes described as subscribers) or non-take rate impacted demand (sometimes described as locations). Prior versions of CACM used the take rate impacted unitization.

Reports also may be produced for different levels of geography. This field only specifies the manner in which the data in the report is presented, and does not change the granularity of calculations. That is, CACM computations are done at the Census Block level while CACM reports are available at a higher/summarized level. These areas are explained below.

Census Designated Place – A geographic entity that serves as the statistical counterpart of an incorporated place for the purpose of presenting census data.

Census Block Group – A Census Block group (CBG) is a cluster of Census Blocks having the same first digit of their four-digit identifying numbers within a census tract.

Census Tract – A census tract represents a relatively permanent statistical subdivision of a County.

Company – An abbreviation of the name corresponding to the 14 largest (by line count) telephone providers. If not named, designated as small (SML)

County – The primary legal divisions of most states are termed counties. If a state or territory doesn't have counties, the statistical equivalent area (e.g. Borough, Parrish) is used.

OCN – Operating Company Number based upon GeoResults 2012, 4Q as revised with assistance from FCC, USAC and responses to public notice.

SAC – Study Area Code identifying a collection of Study Areas as described by the Universal Service Administrative Company (USAC).

Serving Area – An area, based on GeoResults, corresponding to the serving wire center boundary of an incumbent LEC.

State – State provides a geographic rollup where State is defined as the 5th and 6th character of the service area.

7.3. Support Model Report Output Field Definitions

The following table describes the calculation for each of the output columns related to the Support Model reports. On export to CSV (comma separated variables), many columns rename to their system definition. Where a calculation is shown in the second column, the definition reflects a pseudo-code explanation. The actual processing code is available within the stored procedures called by the reporting definitions file (RDL).

Table 7

Report Field Name	Definition/Calculation
Benchmark	The lower cost threshold at which funding begins.
BMrk_less_Cost_per_Demand_Unit	Target Benchmark minus Monthly Cost Per Demand Unit
Cable Unserved	Used to include or exclude cable served areas in the analysis. True excludes served areas.
Company Name	An abbreviation for the incumbent provider
County	The primary legal divisions of most states are termed counties. If a state or territory doesn't have counties, the census equivalent
Cumulative Percentage of Subscribers at Rollup	Running total of demand divided by sum of all demand * 100.
Cumulative Total Max Funding	The accumulation of Total Max Funding up to the Total Max Funding (input parameter). In the detail report, once the Total Max Funding hits this value, this Total Max Funding is reported for each detail record thereafter.
DemandUnits Over Alt Tech Cutoff	The sum of Total DemandUnits whose average cost are over the Alternative Technology Cutoff. The model determines which demand is over the Alternative Technology Cutoff by determining if the Benchmark minus Cost Per Unit of Demand is greater than the Alternative Technology Cutoff; then the Active Subscriber is Over the Alt Tech Cutoff, otherwise the demand is under the cutoff.
DemandUnits SprtElgbl	Each Census Block record when rolled up to a specified geographic level is determined to be eligible for support based on this calculation. Calculation: If the Total Max Funding > 0 then DemandUnits Under Alternative Technology Cutoff and over Benchmark, otherwise it is 0. This is then summed to get the demand subsidized.
DemandUnits Under Alt Tech Cutoff	The DemandUnits under the Alternative Technology Cutoff. Sum of DemandUnits where Alternative Technology Cutoff is not exceeded.
Monthly Cost Per DemUnit	Total Cost / Demand Unit in specified geographic area
OCN	Operating Company Number based upon the GeoResults wire center boundary wire center to OCN association as well as corrections from support tickets and public notice response.
Per Unit Funding	Total Max Funding / Demand Units Under Alt Tech Cap
SAC	Study Area Code identifying a collection of Study Areas as described by the Universal Service Administrative Company (USAC)

Report Field Name	Definition/Calculation
Service Area	An area corresponding to the serving boundary of an incumbent telephone provider. The Service area is based upon GeoResults, wirecenter boundaries.
Short Name	An abbreviation for selected incumbent providers
State	State provides a geographic rollup where State is defined as the 5th and 6th character of the Service area
Support Capped Funding	Amount of funding the provider/candidate requires up to the Monthly Support Funding Cap (input parameter). If the Alternative Technology Cutoff is not exceeded then, Support Capped Funding is 0 when $Benchmark - (TotalCost / Unitization Value) * FCC Portion^{22} * Unitization Value$ is larger than or equal to 0. Otherwise it is $FCCPortion * (TotalCost / Unitization Value) - Benchmark$ when $(TotalCost / Unitization Value) - Benchmark$ is less than SupportFundingCap, and $FCCPortion * SupportFundingCap$ when $(TotalCost / Unitization Value) - Benchmark$ is greater than the SupportFundingCap
Telco Served DemandUnits	The number of funded DemandUnits that are broadband served by a Telco. Served refers to having a downstream/upstream speed sufficient to be judged as served. This test is made for an entire Census block. "DemandUnits SprtElgbl" refers to the Demand Units under the Alternative Technology Cutoff.
Telco Unserved DemandUnits	The number of funded DemandUnits that are not broadband served by Telco. Unserved refers to having a downstream/upstream speed insufficient to be judged as served
Total Cost	Sum of Total Cost (Total Opex Cost + Capital Cost) where Alternative Technology Cutoff is not exceeded. Cost is a monthly value
Total DemandUnits	This is the sum of demand under the Alternative Technology Cutoff + sum of demand over the Alternative Technology Cutoff. In other words, this is the sum of demand units in the specific geographic area.
Total Investment	This is the Total Investment from the Solution Set that is under the Alternative Technology Cutoff (as calculated at the CB level). If there is no Alternative Technology Cutoff, then this is the sum of Total Investment from the Solution Set.

²² The complete CACM processing code has a provision that allows the user to modify the portion of an allowable support amount would be funded by the FCC. This functionality is not active in version 3.1 forward. As a result, the "FCCPortion" value in the currently employed code is set to 100%. The pseudo-code description used above retains the "FCCPortion" reference for completeness and consistency with the underlying system code.

Report Field Name	Definition/Calculation
Total Max Funding	<p>The amount of total funding based on the support module before the application of any support funding caps. A demand unit could have cost in excess of the benchmark, but not get funded, since the available funding was exhausted prior to funding the provider/candidate or a support cap was in place. At the point where the Cumulative Total Max Funding reaches the Total Max Funding (input parameter) the last record is the dollar amount where the funding is exhausted. All detail records after this point will have a value of 0. Total Max Funding is 0 when $BMrk_less_Cost_per_Demand_Unit$ is less than 0 and Cumulative Total Max Funding is less than the Total Max Funding Parameter amount. For all other cases if $(Total\ Max\ Funding\ Parameter\ amount - TotalCappedFunding) / (-1 * BMrk_less_Cost_per_Demand_Unit * TotalDemandUnits * FCC\ Portion)$ is greater than 1 then Total Max Funding is $(Total\ Max\ Funding\ Parameter\ amount - TotalCappedFunding)$, and if $(Total\ Max\ Funding\ Parameter\ amount - TotalCappedFunding) / (-1 * BMrk_less_Cost_per_Demand_Unit * TotalDemandUnits * FCC\ Portion)$ is less than or equal to 1 then Total Max Funding is $(Total\ Max\ Funding\ Parameter\ amount - TotalCappedFunding) / (-1 * BMrk_less_Cost_per_Demand_Unit * TotalSubscribers * FCC\ Portion)$</p>
Tribal Lands	A flag to indicate if the Census block composes an American Indian Areas/Alaska Native Areas/Hawaiian Home Lands
Wireless Unserved	Used to include or exclude fixed wireless served areas in the analysis. True excludes served areas.

8 Appendix 1 – CACM Network Topology Methods

8.1. Introduction to CQLL

CACM makes use of two long standing models to develop the CACM network topologies: CostQuest LandLine (CQLL) and CostQuest Middle Mile (CQMM).

This appendix provides an overview of how the wireline topology was developed for CACM. As such, this section includes an overview of the underlying network loop topology platform (i.e., CQLL) as well as a discussion of modeling methods, a summary of key data sources and an overview of results.

Appendix 9 provides a corresponding overview of how wireline middle mile facilities are modeled using the CQMM platform. CQMM output is used by CACM to build the final comprehensive network topology which is in turn utilized in the development of a Solution Set.

CQLL produces a network topology (including cable lengths, equipment sizes and locations, etc.) for use in the CACM application. The modeled network includes all work efforts and components to prepare and place the asset / system for productive use within a network designed to provide the desired level of voice and broadband service.

Inputs, as outlined in this Appendix, are based on publicly available data and service area boundaries. Assumptions and engineering rules reflect real-world / current engineering practices, including how these practices are applied within specific terrain.

Finally, the central economic model is a widely accepted, modern approach to network modeling practices used throughout the industry.

CQLL is a next-generation network modeling platform. It models a forward-looking, optimized network based on a current demand analysis of network utilization. The CQLL platform uses a granular approach, adheres to spatial relationships and is based upon realistic implementations of common engineering guidelines.

At its core, the CQLL modeling platform is a “spatial” model. It determines where demand is located and “lays” cable along the actual roads of the service area to reach that demand point. In fact, a cable path can literally be traced from each demand location to the serving Central Office; a path that follows the actual roads in the service area.

CQLL determines the topology for wireline network components, across all categories of plant required to connect a specific service demand group (e.g. customers, former customers or potential customers) to their serving Central Office – and to provide voice and broadband-capable networks. The model assumes the installation of forward-looking, commercially available telecommunications technologies and uses generally accepted engineering practices and procedures.

8.2. Accurate Bottoms-Up Design

Topologies created by CQLL are grounded in network connections among service demand. Just like an engineer, the model tallies the necessary length and type of network facilities, including relevant network components and electronics, based on demand, Central Office locations and service architectures.

8.3. Developing Costs for Voice and Broadband Services

For the CACM application, CQLL was used to develop a GPON Fiber to the Premise (FTTp) network. More specifically, CACM's FTTp topology is a design where the entire network from the Central Office to the demand location is entirely fiber optic facilities. In this design, the demand point is within 5,000 feet of the fiber splitter.

As noted below, prior versions of CACM provided for a Fiber to the DSLAM topology which included a blended copper and fiber design consisting of a subscriber loop of up to 12,000 feet of copper to the DSLAM and fiber from the DSLAM back to the Central Office.

8.4. Network Assets

The logic behind economic network modelling is derived from a realistic, engineering-based understanding of what drives; i.e., causes, investments in the environment (both physical and customer demand) in which the network will serve.

As a broad guide, the following discussion provides the increments and drivers of the basic assets in the network modelled within the CQLL framework.

Loop: Wireline loop plant connects demand locations to Central Offices. The basic drivers of loop plant investment, including electronics, include all manner of demand and location. The loop is typically broken into a distribution portion and feeder portion. Distribution runs to demand locations from the Feeder Distribution Interface (FDI) described below while feeder runs to the Central Office from the FDI.

The distribution components, drivers, and nomenclature of the typical loop as modeled in CQLL are described below:

Network Interface Device (NID)– The NID serves as a demarcation point between customer wiring and the carrier's distribution plant. In a Fiber to the Premise (FTTp) installation, an Optical Network Terminal and battery are used in place of a conventional NID. In regard to the NID, for telecom deployment it is sized based upon copper pair demand, which is a function of service demand.

Optical Networking Terminal (ONT) – An ONT is used to provide services to customers in an FTTP topology. An ONT is hosted by an Optical Line Terminal. The ONT is placed at each demand location.

Customer Premise Equipment (CPE) – CPE can be capitalized equipment that is placed on a customer premise. Its use is driven by a particular service (e.g., a modem for DSL). CPE investment is driven by the count of services, customers served, and ultimate ownership of the equipment.

Drop Wire (Drop) – For telecom deployment, the Drop is a cable sheath consisting of two or more pairs of copper wires which permanently connects the NID to a Distribution Terminal (DT). Essentially, the drop wire provides the connection between the premises and the distribution cable at the street. A drop wire can be buried or aerial and is driven by customer demand. For Fiber to the Premise (FTTp) deployments, this drop is fiber, rather than copper, and connects up to the Fiber Service Terminal.

Distribution Terminal / Building Terminal (DTBT) – For telecom deployment, the Distribution Terminal (DT) is the point where the drop wires from several customers are connected to pairs in a larger cable. This cross-connect (sometimes called a “tap point”) can be located at a pole, handhole, buried splice, or pedestal. In some circumstances, the cross-connect or tap point can be a Building Terminal (BT). The BT acts as the demarcation point at a location where it is more effective to simply terminate a distribution cable at the customer’s premise rather than using drop cables and NIDs. For FTTp, the DTs and BTs are replaced by fiber service terminals (FSTs) and are fed by fiber cable.

For reporting purposes, the cross-connect point, whether it is a DT or BT or FST is described and tracked as a DTBT within CQLL. It is generically referred to as Node3 in topology structure diagrams.

Distribution Cable (DT-FDI) – The DT-FDI is the loop component that connects the DTBT with the feeder cable at the Feeder Distribution Interface (FDI). For FTTp designs, the distribution cable is fiber.

As the topology is exported to CACM, the CACM user inputs specify the percentage of distribution cable that is buried, underground or aerial through the entries in the plant mix table. The plant mix table is a portion of an Input Collection.

The major components of the feeder portion of the loop are described below:

Feeder Distribution Interface (FDI)– In copper loop architectures, the FDI is where distribution cables are connected to a feeder cable. The FDI allows any feeder pair to be connected to any distribution pair. (For reporting purposes, a portion of the FDI is assigned to distribution.) For FTTp designs, the FDI is replaced by the Fiber Distribution Hub (FDH) or Primary Flexibility Point (PFP).

Fiber Distribution Hub / FiberSplitter (FDH/PFP)– In an FTTp design, the fiber cable from the OLT in the Central Office or in the field is split at the FDH/PFP into 16 to 32 distribution fibers. These 16 to 32 distribution fibers then connect to ONTs at the premises.

DSL Access Multiplexer (DSLAM) –In an FTTd network, a DSLAM provides voice and broadband service capability and receives data from multiple DSL connections and most often aggregates the data onto a high speed Gigabit Ethernet (GigE) backbone.

The FDI, FDH/PFP and DSLAM are generically referred to as Node2 in topology structure diagrams.

Optical Line Terminal (OLT) – In a FTTp design, the fiber cable from the PFP terminates on an OLT. This OLT can either be housed in the Central Office or in the field.

Gigabit Ethernet (GbE or GigE)– A term implying the use of Ethernet to carry data at Gigabit speeds over Fiber Optic cable. For example, GigE is generally used to transport data from DSLAMs to the Central Office.

Feeder Cable (FDI-DLC and DLC-CO)– The feeder cable transports traffic, either voice or data, between the FDI/PFP and the Central Office in the telecom environment.

Ethernet Switch (eSwitch) – Internet Protocol traffic from each Service Area is routed to an Ethernet switch located in each Central Office.

The OLT and Ethernet Switch are generically referred to as Node0 in topology structure diagrams.

8.4.1 End User Demand Point Data

Within CQLL, the modeling exercise can begin with address-geocoded customer point data. Address geocoding is a method used to match a customer address to a location on a physical (real world) road network. Address geocoding is a well-established technique to derive a locational attribute, such as longitude and latitude or linear reference,²³ from an address.

CQLL then augments actual geocoded point data with surrogate locations for demand that cannot be located accurately. These surrogate locations are based upon generally accepted data sources (e.g., Census data), client-specific engineering and optimization rules, and standard industry practices.

In the current CACM implementation, CQLL uses geocoded information from GeoResults and Census information to derive estimated demand locations. As noted above, the surrogation of points is based upon generally accepted practices and occurs at the finest level of Census geography. That is, the surrogation of data takes place at the Census Block level using the roads and customer counts within each Census Block. A technique called “stacking” provides for a relevant representation of demand located in apartment buildings. Care is taken so as not to place customers on specific types of roads such as interstate highways.

8.4.2 Service Areas

Using industry standard engineering rules, road distance and service demand information (e.g., DS0s, pairs, Living Units, etc.), service clusters are formed. A service cluster is a group of demand points which share a common loop network technology. For example, for a broadband network a service area could be described for all demand locations sharing the same DSLAM. Within each cluster, appropriate forward-looking digital equipment and copper and/or fiber cable is placed. Service clusters are used to surrogate: Distribution Areas (DAs), Fiber Serving Areas, Carrier Serving Areas, and Allocation Areas (FSA/CSA/AA).

²³ A linear reference is a method by which location is described in terms of a distance along a feature. A highway mile-marker is a type of linear reference. This is in contrast to a latitude, longitude which is a locational reference in terms of a grid placed upon the Earth’s surface.

8.5. Methods - Efficient Road Pathing and Networks

CQLL designs a network to serve demand locations within a service area (e.g., wire center, etc.) based on where they actually reside. The model “lays” cable along the actual roads in the service area to connect locations with their serving Central Office. As this section demonstrates, the network can be seen on a map of the actual roads in a service area. In fact, it will aid the reader in understanding the model if he/she begins to immediately consider *visually* the spatial layout of a road network. The figure below shows the road network for a typical service area.

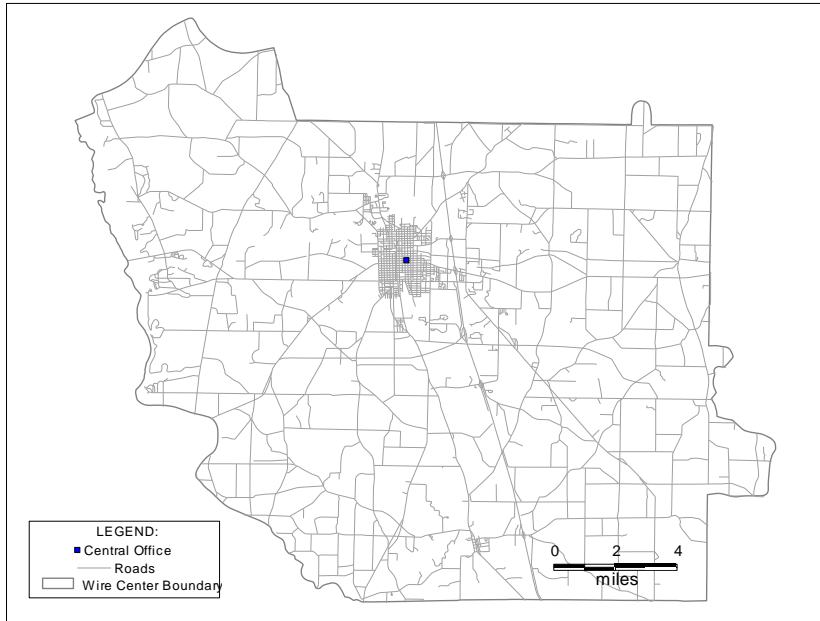


Figure 5 -- Road Network

8.6. Demand Data Preparation

The demand location data (both business and residential) was pulled from public sources. For residential data, GeoResults address data was trued up with Census household counts. For business data, GeoResults address data was used. In each case, counts of locations by address and/or Census Block are provided. Before the customer data can be used, it must be located on the earth’s surface, along a road path so that the network routing algorithms know where to route. For demand location that is non-address or cannot be geocoded, a random placement algorithm is used to place the demand locations along the roads of the Census Block. Care is taken so as not to use roads that are restricted (e.g., interstate highways). In addition, multifamily and buildings containing residential and business demand are tracked. This allows CQLL to identify the appropriate multi-dwelling equipment rather than replicate single demand unit equipment.

Figure 6, presents a section of the view shown in Figure 7 with demand locations shown as circles. In this example, these circles represent *all* of the service demand points (e.g., both business and residences). The demand and service data are now ready for processing by CQLL.

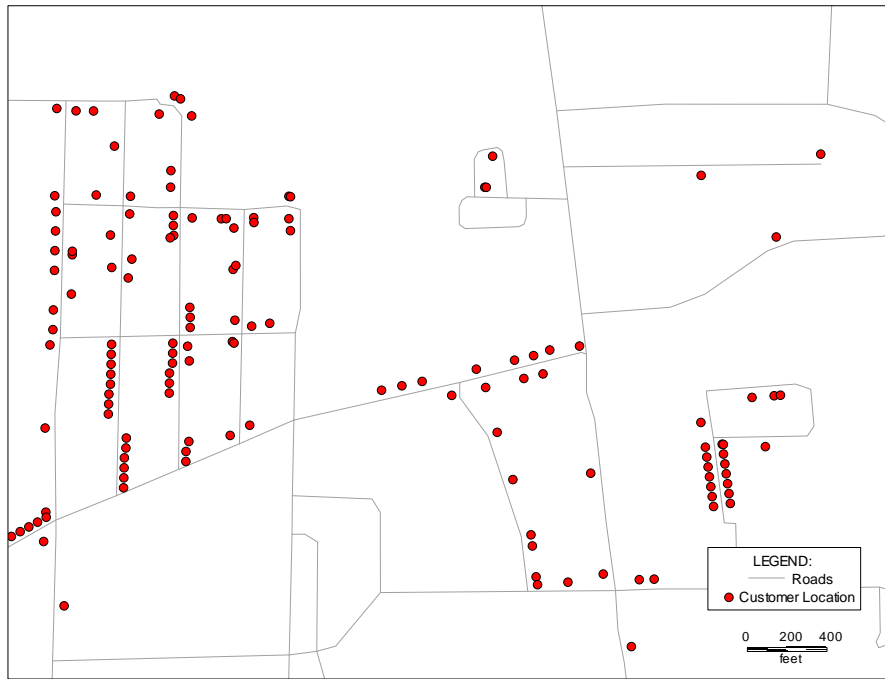


Figure 6 -- Demand Locations

8.7. Efficient Routing

Using the demand locations and the road network, specifically designed and reviewed algorithms determine network routing and placement based upon standard industry engineering rules. As a first step, CQLL uses an Efficient Road Pathing (“ERP”) algorithm to develop the optimized routing from the Central Office to all demand locations. Once a full service area ERP is determined, CQLL develops natural clusters by linking demand points that are close together (e.g., neighbors). These neighbor groups are further combined with other nearby customer clusters to form larger clusters (“neighborhoods”). This process continues until the clusters reach the limits of length and/or capacity as specified by the engineering design (e.g., 5kft max length from the fiber splitter). Once all demand locations to be served by a host node are determined, appropriate components such as Feeder Distribution Hubs (FDHs), Fiber Nodes and Feeder Distribution Interfaces (FDIs) are located within each serving area. Once the serving nodes are placed within these “remote” served serving areas, an optimal path is formed to the hosting Node. The path within each serving area then becomes the distribution cable path. This process continues until all portions of the service area have been “clustered”.

For those demand locations served by a terminal in the Central Office, a distinct ERP is determined. Once the main Central Office served areas are determined, an ERP is created. These tree paths are then ‘walked’ to determine points at which Feeder Distribution Interfaces (for copper areas) or Fiber Distribution Hubs (for fiber served areas) terminals are to be placed. These placements are driven by user inputs guiding demand location counts and distance limits.

As a final step in the pathing algorithms, an ERP for feeder plant is determined. That ERP links the nodes outside of the Central Office (e.g. DSLAM or FSH, Node2) to the Central Office (CO).

Figure 7 depicts a distribution network created by the process based on the optimized ERP approach. Figure 8 depicts the same type of information for the feeder network.

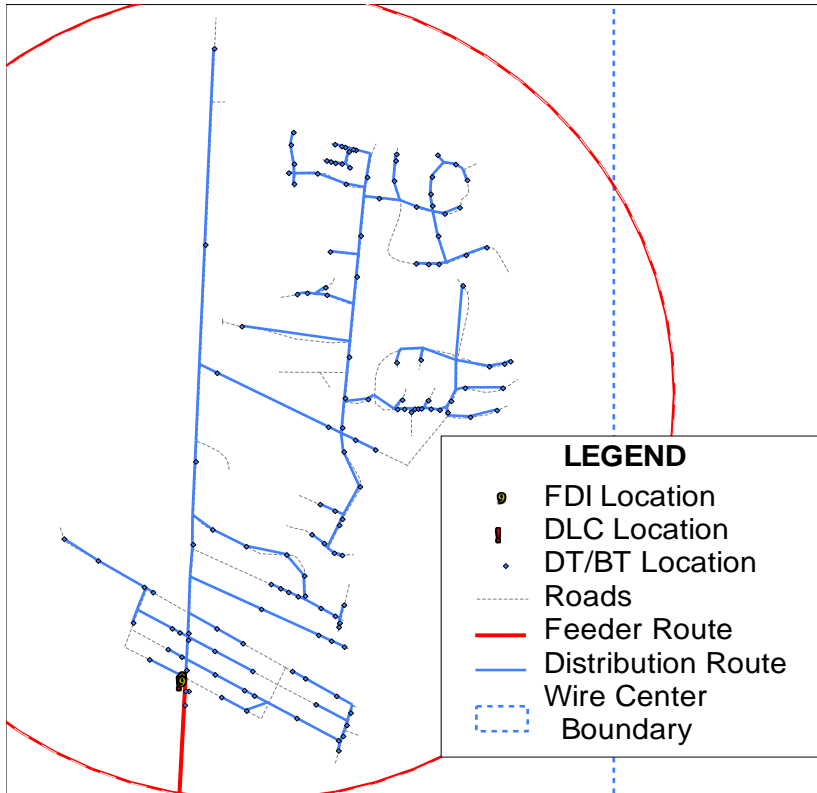


Figure 7—Distribution Plant

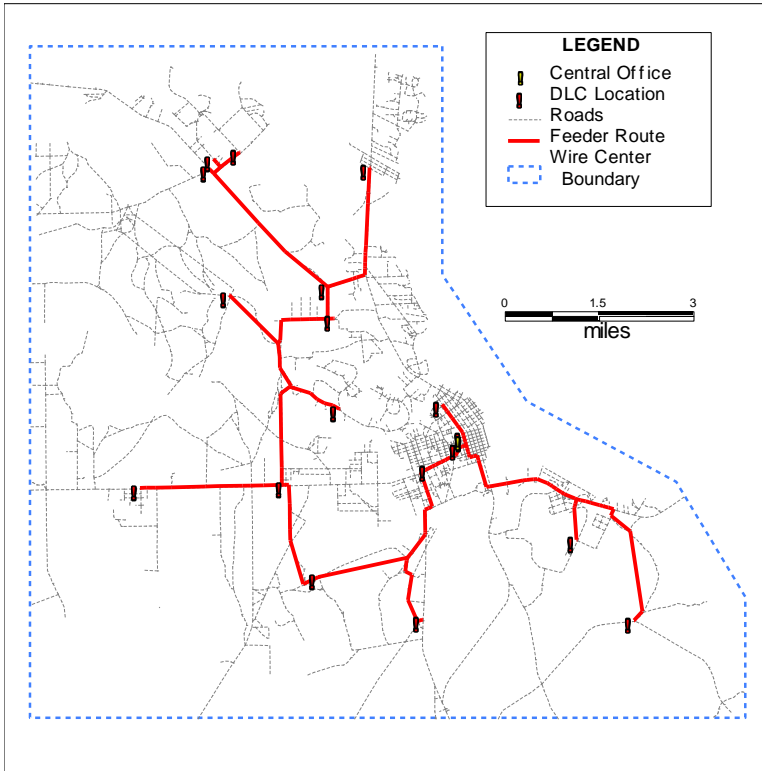


Figure 8 -- Path for Feeder Plant

After the serving areas and optimal routings are determined, engineering rules guide the installation and placement of electronics, such as Fiber Nodes, DSLAMs, and Central Office Terminals.

Once the spatial layout of the network is determined, CQLL's Configuration Process connects the network components. This entails the determination of cable sizes, identification of service points requiring special engineering, and selection and sizing of Node2 type. Once the network is configured, CQLL summarizes the network topology information to create the source file for the CACM application. In this summarization, the information about the network build is related to / associated with the relevant Census Block records. As such, each Census Block record captures the size of the main serving terminal (e.g., DSLAM, FDH, etc.), the demand at the Central Office, the length of the feeder and distribution cable and the portion attributable to the Census Block, and other pertinent information relevant to the network build.

CACM allows an end user to review these two summary files by wire center. These reports are available as Audit reports, Audit Network Design Dist or Audit Network Design Feeder.

8.8. CQLL Network Engineering, Topologies and Node Terminology

CQLL develops investment estimates for wireline loop plant. The loop is the portion of the telecommunications network that extends from the Central Office (CO) to the demand location.

A loop extends from a demand location (a business or housing unit). It can be terminated on specific customer premise equipment, CLEC equipment or any multitude of routers, gateways or specialized equipment necessary to support IP driven services like VoIP.

CQLL designs a network using forward-looking technologies and design principles. To meet the heterogeneous engineering characteristics of today's service providers, CQLL is capable of modeling different wireline topologies. This section describes potential network topologies and lists the Node reference for each. It is helpful to understand the unique Node naming conventions as these descriptions carry forward to audit reports and cost / investment information.

In the CACM network designs, the references to network topology have been standardized by using the values of Node0 through Node4. Node identifiers are used to help bridge the understanding of functionality across the differing technologies (wireless and various forms of fiber and hybrid fiber solutions) that are used in CACM. The "nodes" are significant in that they represent the way in which costs are assigned / aggregated to enable comparisons across technologies. Node diagrams for both FTTp and FTTd designs are provided for reference.

The FTTd design, available in earlier versions of CACM is shown in Figure 9.

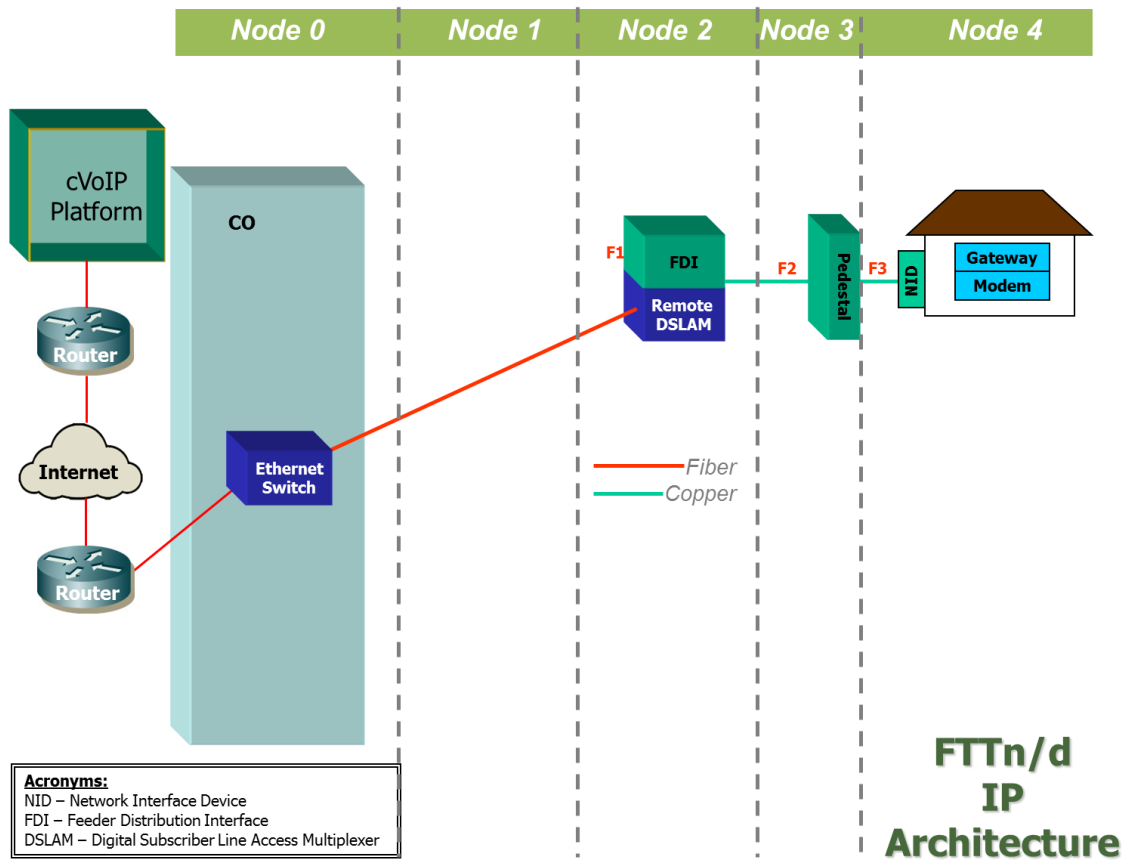


Figure 9--FTTh and FTTh Topologies

The second IP based topology is Passive Optical Network (GPON) FTTP (Fiber to the Premise), as depicted below.

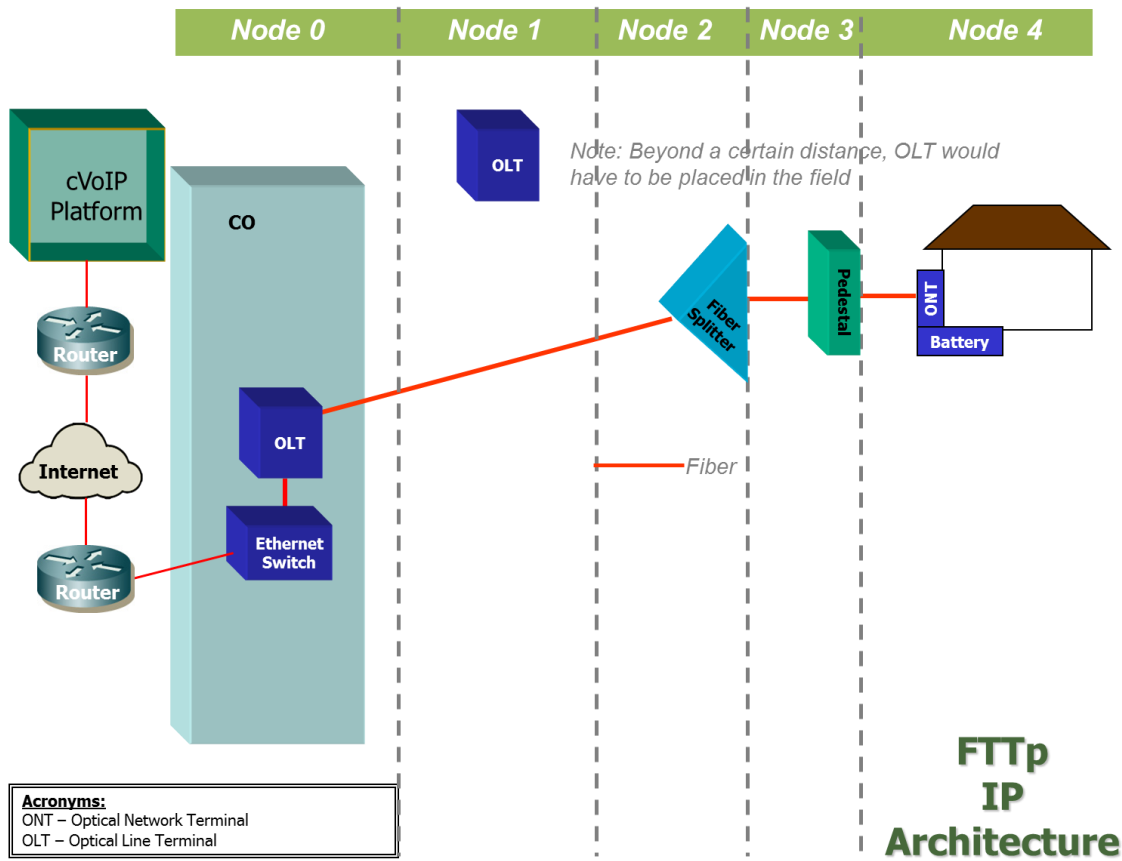


Figure 10--FTTP topology

In this topology an ONT (Optical Network Terminal) is placed at the demand location, along with a battery for backup power. Fiber cable then connects to the Central Office. Along the path, the fiber is concentrated at the PFP (Primary Flexibility Point) or FDH (Fiber Distribution Hub) in a typical 32 to 1 ratio. At the Central Office, the fiber from the PFP or FDH terminates on an OLT (Optical Line Terminal). The traffic is then sent to an Ethernet switch. IP packets are routed to the IP network via a connection to a router. This gateway router can be in the Central Office or can be located at an intermediate office to support multiple Central Offices.

8.9. Key Network Topology Data Sources

Network Topology development requires data inputs and modeling assumptions unique to CACM's requirements and assumptions. Input data and relevant sources are outlined below.

8.9.1 Service Area Engineering Input data

Public domain and commercially licensed data products provide the foundation for the CQLL model. This included service area boundaries, Central Office locations and demand sources.

- Service Area boundaries
 - GeoResults, 4th Qtr 2012.
- Central Office locations
 - GeoResults, 4th Qtr 2012.

8.9.2 Demand data

The goal of CACM was to produce investment for all potential voice and broadband demand locations, CQLL develops a network serving all potential residential and business locations.

Residential demand was based upon GeoResults (3rd Qtr. 2012) data that provided residential and business address data. Residential counts in each Census block were trued up to Housing Unit counts from 2011 Census data. Business demand data was also derived from GeoResults (3rd Qtr 2012).

8.9.3 Supporting Demographic Data

CQLL requires several additional data sources to support road pathing and demographic analysis.

These data sources are described below:

- Roads
 - Source: US Census TIGER
 - Vintage: 2010
- Census Blocks
 - Source: US Census TIGER
 - Vintage: 2010
- Demographic Estimates
 - US Census Housing Unit and Population Estimates
 - Vintage 2011

9 Appendix 2 – CACM Middle Mile Network Topology Methods

9.1. Introduction to CQMM

In concert with the development of loop topologies using CQLL, the middle mile methodology and approach of CACM uses components of the CostQuest network modeling platform (CQMM).

The middle mile is that portion of the network that provides a high capacity transport connection between a service provider’s network core and its second (Node0 to Node2) and last mile network (Node2 to Node3).

In CACM the middle mile is assumed to extend between the service provider’s point of interconnection with the internet and the service provider’s point of interconnection (“POI” or CO) with the second and

last mile network built to support end user broadband demand locations in unserved areas. This relationship is illustrated in the Figure 11.

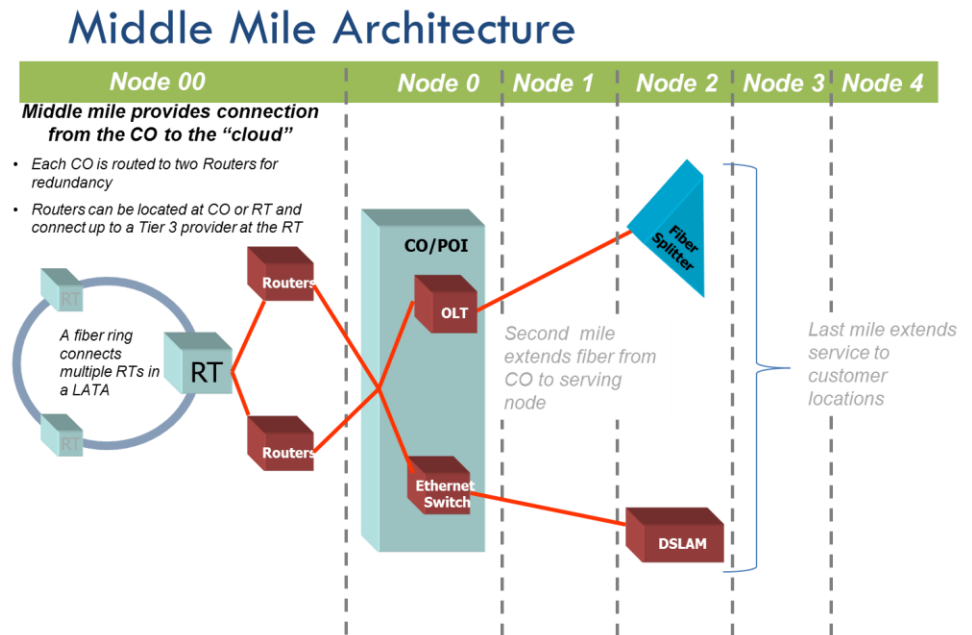


Figure 11--Middle Mile Architecture

The material that follows provides additional information on how middle mile investments are developed within CACM.

The approach used to determine middle mile equipment required – and then to compute the related investment costs – is centered in the spatial relationship between the service provider’s point of interconnection (POI or CO) with the second and last mile network (designated as a Central Office) and the service provider’s access to a Tier 3 internet gateway (a surrogate for such access is assumed to be at a regional access tandem (“RT”) or RT ring).

Central Office Location: the location of each Central Office (also referred to as POIs, and/or Node0s) is obtained from the GeoResults database. The results of this approach align with the Central Office/Node0 locations used in the underlying CQLL Network Topology model used to create the local loop network, including last and second mile related equipment and investments.

Regional Tandem Location: Regional tandem (RT) locations (and the relevant feature groups deployed) were obtained from the LERG® database. Each tandem identified as providing Feature Group D access in LERG 7 is designated an RT. As with COs, a latitude and longitude is identified for each RT.

The underlying logic (and the process) of developing middle mile investment requirements is grounded in the assumption that the Tier 3 internet peering point is located at an RT or on the RT ring – meaning that if the modeled design ensures each Node0 is connected to an RT, the corresponding Node0 customers all have access to the internet.

Given this baseline data on CO and RT locations and working under the assumption outlined above, the middle mile processing logic proceeds as follows:

- The Middle Mile process is run state by state. All Node0's in a state are homed to an RT in that same state
- Within a state, each Node0 is assigned to its nearest RT (Node00) to create the initial spatial relation of (“parentage”) Node0s to RTs.
- Node0 records are then routed to other Node0 records with the same Node00 parent using a spanning tree approach based on the shortest (most efficient) distance routing back to their proper Node00 record.
- The Node00 records within the same LATA are routed together in a ring. To ensure an efficient (and hence ‘most likely’) design the shortest ring distance is used. The shortest ring is chosen by starting at each Node00 point and storing the ring distances. After stepping through each potential ring route, the shortest ring distance is then used for further computations.

With that information in hand, CACM develops middle mile costs thru the following steps:

- a. The distance of the RT rings is attributed to each Node0 on the ring in proportion to the number of potential customers at each Node0 as compared to the total potential customers for all the Node0s attached to the RT Ring.
- b. The distance on the Node0 tree back to the RT is attributed much in the same way as the loop feeder routing. That is, CACM attributes each route based on the cumulative potential customers that can use the route.
- c. For electronics, CACM captures the broadband routers (it is assumed that each CO/POI will connect to two routers to provide redundancy) which connect up to the fiber at RT/Tier 3 location. Additional electronics of the RT/Tier 3 or the RT ring are not included as part of the local access costs.
- d. For the fiber placement, CACM assumes a portion of the conduit, buried trenching and poles already exist for the local access network (this sharing is controlled in the Capex input workbook). As such, only a portion of additional costs for conduit, buried trenching and poles is captured for middle mile. CACM does retain the full cost for fiber which supports the end user broadband-capable network.
- e. From the total middle mile costs that are calculated, CACM captures a portion of the costs (some costs are assumed to be absorbed by uses other than CACM voice and broadband services, e.g., special access services). This sharing assumption is controlled in the Capex input workbook.

- f. Finally, CACM relates the middle mile cost to each Census Block (the basic unit of geography in CACM) based on the proportion of potential demand locations in the Census Block (as compared to the total potential customers in the POI/CO/Node0 serving area).

10 Appendix 3 – Data Source and Model Application Summary

The table below provides a summary (inputs grouped by category) of the major data inputs to the CACM along with the underlying source for that data and a reference to where that data were used within the model.

Table 8

Data Category	Model Variables	Data Source	Wireline Coverage	Capex	Opex
Census boundaries	Full Census Block; full Census Block Group; full Census Tract; full Census County; Census State	TIGER\Line 2010	X	X	x
Service Area boundaries and Central Office locations	Service Area boundaries, codes and Central Office points, as adjusted by public comment and USAC review	GeoResults 4Q 2012	X	X	
Geographic characteristics	Land area; total road length;	TIGER\Line 2010	X	X	
Terrain	Terrain characteristics	USDA, NRCS-STATSTGO	X	X	
Housing Units	Occupied housing units; total housing units; total households by block. Adjusted by Census Population and Housing Unit Estimates	Census 2010, SF1 housing units. Census Population and Housing Unit Estimates, 2010	X	X	X
Provider size and organizational structure	Corporate ownership; size of parent company; number of wire centers operated by carrier	ABC Coalition Members, Support Feedback, FCC, USAC	X	X	X

Data Category	Model Variables	Data Source	Wireline Coverage	Capex	Opex
Company Opex financial data	A wide array of company-specific financial information (and underlying business volumes) from public and subscription service sources. Data centers on operating expense by category (e.g., maintenance, sales, interconnection, sales and marketing, G&A, bad debt, taxes, etc.).	Data sources available in methodology			X
High capacity locations	High capacity locations represent high demand business points and will be used to improve business location points for sizing the network. Community Anchor Institutions (CAI) taken from National Broadband Map.	GeoResults 3Q2012 National Building Database and Detail Business File. CAI from SBI Round 6	X	X	
Wireless tower location	Wireless tower locations represent locations requiring fiber service and are used to supplement business and residential customer points for sizing the network.	CostQuest proprietary tower database	X	X	
Fixed Wireless broadband service	Fixed wireless provider broadband speed coverage within a Census Block (Transtech 70,71), as adjusted based upon FCC Form 477 reporting.	National Broadband Map (Round 6). FCC Form 477 (June 2012)	X		
Telco broadband service	Telecommunications provider broadband speed for wireline area coverage within a Census Block (Transtech 10,20,30,50)	National Broadband Map (Round 6)	X		
Cable broadband service	Cable provider broadband speed for cable area coverage within a Census Block (Transtech 40,41) as adjusted based upon FCC Form 477 reporting.	National Broadband Map (Round 6) . FCC Form 477 (June 2012)	X		

11 Appendix 4 – CACM Data Relationships

The schematic provides an overview of how data are organized and related within CACM. The diagram is designed to illustrate at a high level the relationships between inputs and the resulting Solution Set.

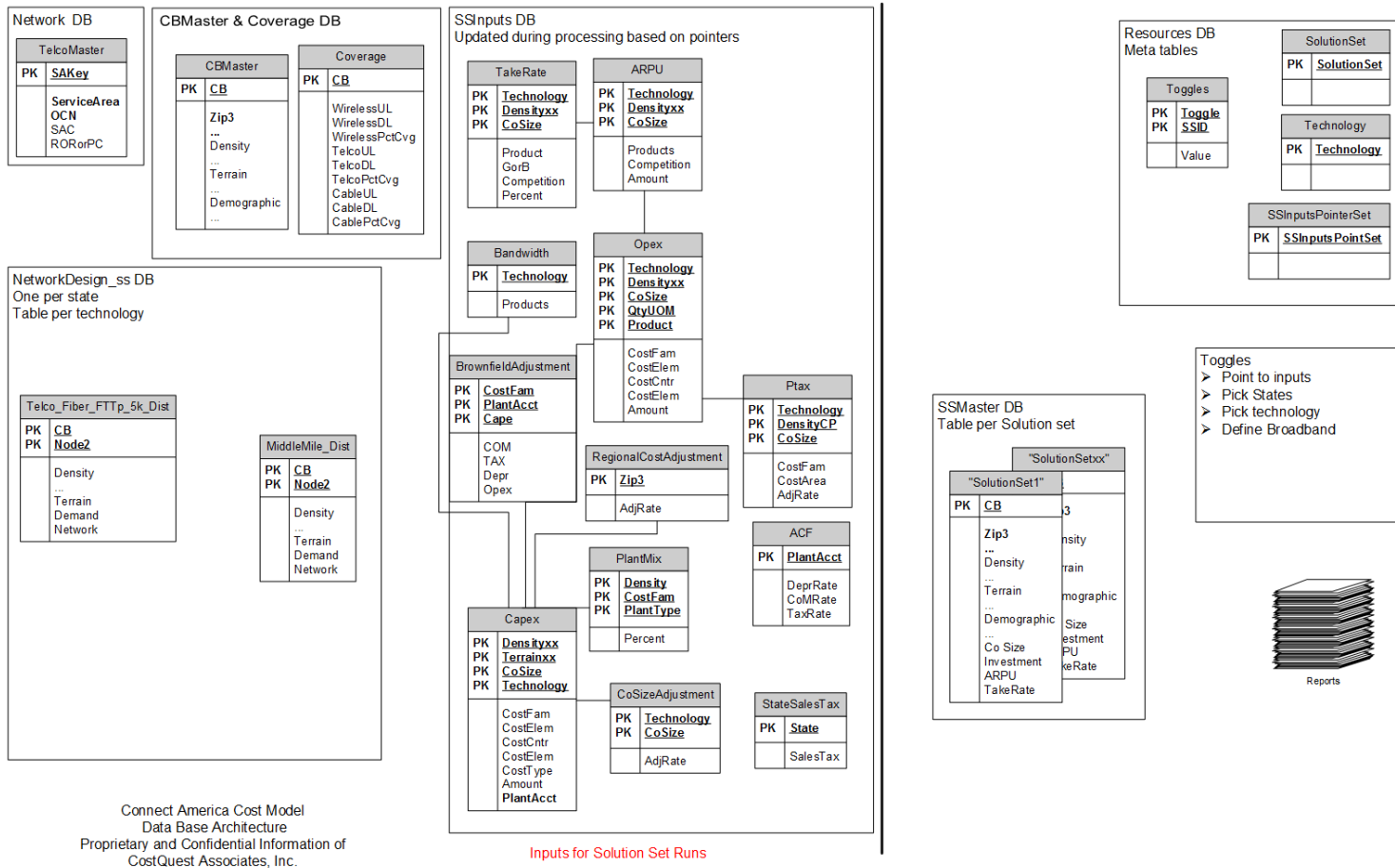


Figure 12--CACM System Schematic

12 Appendix 5 – CACM Processing Schematic

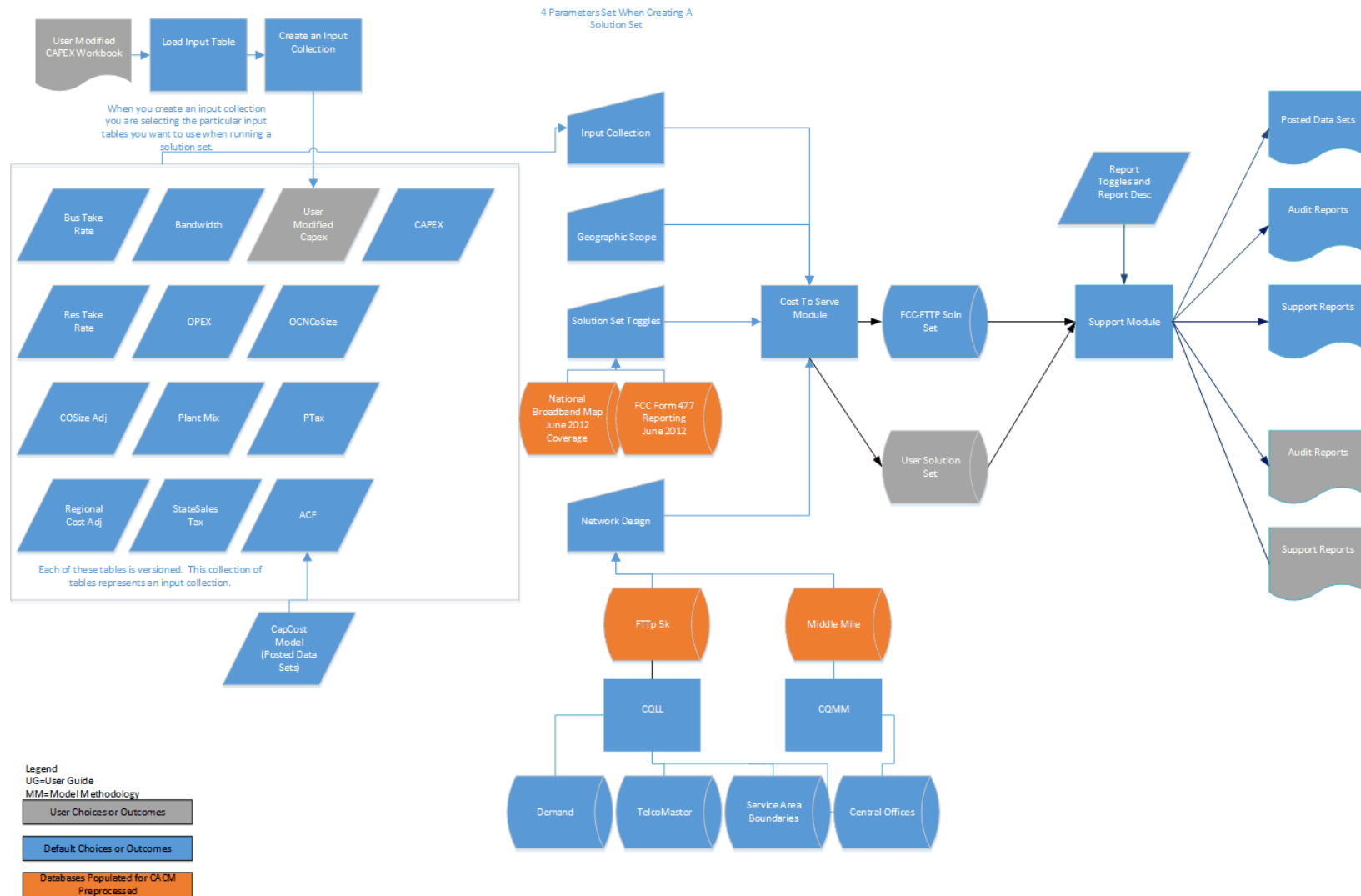


Figure 15--CACM Processing

The diagram in Figure 15 is color coded to illustrate how information can flow through CACM. Specifically, the grey colored objects reflect a system input (e.g., an input table) that is driven by a user. Once that input table is loaded into the system, it becomes part of an input collection then a user generated Solution Set. In contrast, many users run CACM without modifying any inputs and are reliant on default (blue) system objects.

From left to right Figure 15 shows that a group of input tables (i.e., Input Collection) is used by the Cost to Serve Module. Users can either use the default input collection or load their own tables to suit particular analytic needs. The files which constitute an Input Collection are shown in Figure 15 and further described in Appendix 6. The Input Collection is where users provide information about the cost of plant such as structure (e.g., Poles, Conduit) or costs of equipment (e.g., DSLAMs, Fiber Splitters).

Along with an Input Collection, the Cost to Serve module also requires information on the geographic scope of analysis, the type of network to build and two other toggles to create a Solution Set²⁴. Once the Solution Set has run, several types of reports are available from CACM. Additional information about CACM reports is also available in the User Guide.

Also note on Figure 15 several orange symbols. These orange components represent additional databases which are preprocessed and available as inputs into CACM.

²⁴CACM allows you to export a Solution Set as part of the Audit Solution Set report. The audit report contains the portion of a Solution Set specific to the user entered Service Area name.

13 Appendix 6 – CACM Input Tables

The inputs which form the basis of an input collection are available as a download from the CACM website.

- Annual Charge Factor (ACF)
 - This table captures the Annual Charge Factors that convert Investment into monthly costs. The values loaded into CACM are produced by CostQuest's CapCost model which is available for download. The basis of the model is the economic determination of the depreciation, cost of money, and income taxes associated with various plant categories. The calculation incorporates industry standard procedures, such as Equal Life Group methods, inclusion of future net salvage, impact of deferred taxes, and mid-year conventions.
 - Key inputs into the derivation are lives of plant, assumed tax lives, survival curve shapes, cost of money, cost of debt, debt/equity split, and future net salvage
 - Cost of Money set at 9 percent
 - Uses depreciation lives consistent with those prescribed by the FCC's Wireline Competition Bureau's latest general depreciation in CC Docket No. 92-296
 - How Used: Converts Investment into monthly values of Depreciation (DEPR), Cost of Money (COM), and Income Taxes (TAX)
- Bandwidth
 - Provides the busy hour bandwidth
 - Used to size appropriate network components
 - How Used: Bandwidth is currently not a driver of any capex investment or opex cost.
- Business Take
 - How Used: Derives the voice and data demand for the business market
- Capex
 - Provides the material and installation costs for the plant build
 - Data are applied against the network topology data to derive total build-out investment levels
 - Inputs capture technology, network node, network function, and plant sharing²⁵
 - How Used: Values which derive the total capex.
- COSize Adjustment
 - Provides the user the capability to adjust the assumed purchasing power of small, medium, and large providers
 - The current inputs assume that all providers can achieve the same purchasing power (either as a result of their size or their ability to buy as a consortium)
 - Adjusts up or down the Capex costs in the model, current inputs are set to 1
 - How Used: In the current release of the model, COSize Adjustment table is used but the value is set to 1.

²⁵ See Appendix 8 for additional information on Plant Sharing.

- OCNCoSize
 - Provides correspondence for OCN, company size category and SAC.
 - How Used: Categorizes the size of each company.
- Opex
 - Provides the estimated operation costs to run and maintain voice and broadband-capable networks.
 - How Used: Values help to develop the operational cost development.
- PlantMix
 - Provides the estimated mix of facilities by type: aerial, buried, and underground
 - How Used: Determines the mix of facilities required to serve an area.
- PTax
 - Sourced from property tax rates in each state compared to a national average
 - Provides the impact of property tax on the G&A operation costs given the difference of the state rates versus the national average
 - Captured in the multiplier used for the operational element
 - How Used: Provides an index value to capture the impact of property tax in the operation costs.
- RegionalCostAdjustment
 - Sourced from third party source – RSMeans (2011)
 - Provides the estimated difference in the cost to build and operate in each part of the county
 - Used to drive differences in Capex and Opex costs due to labor and material cost differences across the country
 - Applied to All Capex and indirectly to specific Opex components that are derived from Capex
 - How Used: Captures material and labor costs difference at ZIP3 level.
- StateSalesTax
 - Sourced from appropriate sales tax rates for telecommunications plant in each state
 - How Used: Impacts Capex derivation, applies State Sales Tax.
- Residential TakeRate
 - How Used: Derives the data and voice demand for the residential market

14 Appendix 7 – CACM Plant Sharing Input Walkthrough

This material provides an overview of the source and use of the input tables in the Plant Sharing tab of the Connect America Fund Cost Model (CACM) Capex input workbook. The order in which we describe the components below is designed to explain the interaction between these functions and is not necessarily the sequence or flow in terms of how the tables are used within CACM.

Modern telecom networks increasingly enjoy the benefits of sharing facilities and capacities across different services to different customer groups in different geographies/locations. The ability to leverage network investments in this way is vital to the network’s economic performance through time. Within the context of CACM, it is important that mechanisms exist to share facility and structure costs across the relevant network functions and geographies (e.g., ultimately, across Census Blocks).

As outlined below, there are four components of the CACM plant sharing function (i.e., four types of facilities sharing):

- Sharing Between Distribution and Feeder
- Sharing Between Providers
- Sharing Of The Middle Mile Network
- Sharing Of Middle Mile Routes Associated with Voice and Broadband

Each of these components is explored further in the material that follows. In each section we describe the type of structure sharing and the CACM Logic which then employs and processes those inputs.

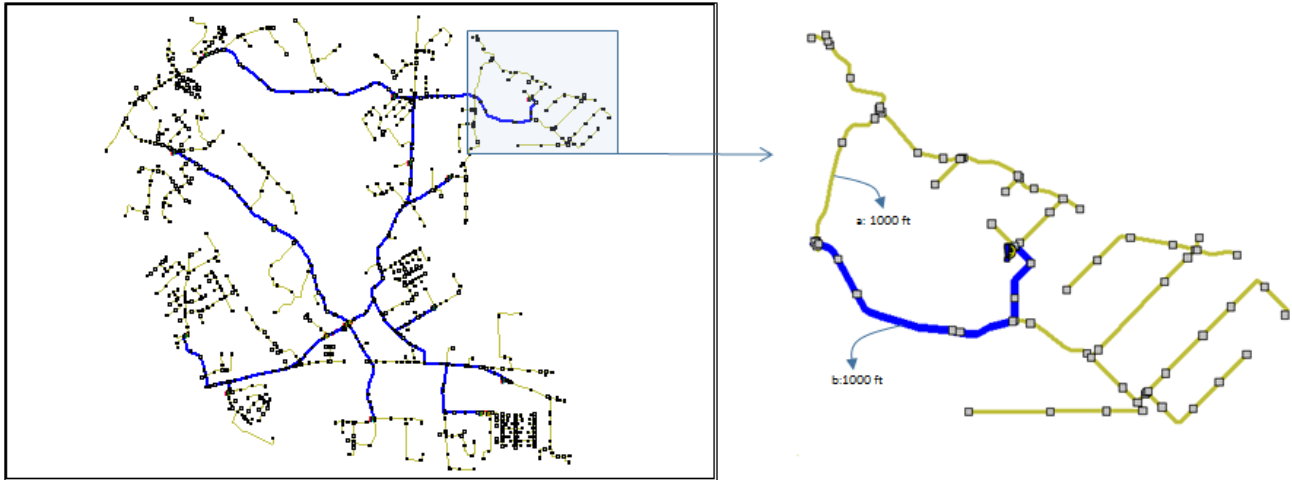
14.1. Sharing Between Distribution and Feeder

This input table provides the percent of common route (both feeder and distribution on the same route) that shares structure in three density categories (i.e., Rural, Suburban and Urban) across three types of plant (i.e., Aerial, Buried and Underground).

Density	% of common route that shares structure		
	Aerial	Buried	Underground
Rural	0.78	0.41	0.67
Suburban	0.78	0.41	0.67
Urban	0.78	0.41	0.67

CACM Logic: The schematic that follows represents a typical network topology developed by CACM. For additional information on how network topologies are developed within CACM please refer to the CACM Methodology.

In this schematic distribution pathing is represented by golden lines, feeder pathing is represented by blue lines, and pedestals are represented by gray boxes.



The expanded diagram to the right shows a typical Node2 cluster (e.g., the pedestals served by a specific splitter in an FTTP network). Within the topology creation process, each segment (network node to network node) is tracked with information on:

- Density of the area in which the segment resides
- Terrain of the area in which the segment resides
- Length of the segment
- Amount of segment that is shared between distribution and feeder routes

Using the schematic above as an illustration, the discussion that follows explains how CACM develops structure sharing "Between Distribution and Feeder".

Consider two segments (a) and (b) labeled in the expanded diagram at right in the schematic above. Each segment is 1000 feet long. Segment A is ONLY a distribution route and Segment B is BOTH a distribution route and feeder route (100% of the route is shared). To simplify our example, assume the plant mix for both segments is 50% aerial and 50% buried and further assume that the area is Suburban.

When developing the topology, fiber routes are planned for each segment. For Segment A, 1000 feet of fiber is installed for the distribution plant. For Segment B, 1000 feet of fiber is installed for the distribution plant AND 1000 feet of fiber is installed for the feeder plant.

With these requirements in mind, structure is now designed for each segment. For Segment A, based on the 50/50 split of Aerial and Buried, 500 feet of trench will be dug and poles for a 500ft route will be placed. For Segment B, both feeder and distribution cables are being placed. However, the inputs provide for the fact that there will often be timing differences in design and placement and there is a probability that different forms of structure will be used between feeder and distribution. As such, we will likely need more than 1000 ft of overall structure (though less than the 2000 feet of structure that would be required if the feeder and distribution plant are built entirely independently of one another).

To arrive at the structure needs for Segment B, we refer to the "Between Distribution and Feeder" table to guide the calculation.

Specifically, referring to the input values in the table above, for the 500 feet of required Aerial distribution structure and the 500 feet of required Aerial Feeder structure:

- (100% - 78%) , or 22% is dedicated or non-shared...or 110 feet and
- 78% is shared...or 390 feet.

Since both feeder and distribution are sharing the same pole 78% of the time (or 390 feet for this 500' span of cable), we assign 1/2 of the 390 feet (i.e., 195 feet) to Distribution and 1/2 of the 390 feet to Feeder. The total Aerial structure feet for distribution is then 110 feet of dedicated and 195 feet of shared for a total of 305 feet of distribution structure; and, for feeder the total Aerial structure feet is 110 feet of dedicated and 195 feet of shared for a total of 305 feet of feeder structure.

Again, referring to the input values above, for the 500 feet of required Buried distribution structure and the 500 feet of required Buried Feeder structure:

- (100% - 41%), 59% is dedicated or non-shared...or 295 feet and
- 41% is shared...or 205 feet.

Since both feeder and distribution are sharing the same trench, we assign 1/2 of the 205 feet (i.e., 102.5 feet) each to Distribution and Feeder. The total Buried structure feet for distribution is then 295 feet of dedicated and 102.5 feet of shared for a total of 397.50 feet of distribution structure. For feeder, the total Buried structure is also 295 feet of dedicated and 102.5 feet of shared for a total of 397.50 feet of feeder structure

14.2. Sharing Between Providers

This input table provides the percent of cost attributed to a studied carrier across three density categories (i.e., Rural, Suburban and Urban) across three types of plant (i.e., Aerial, Buried and Underground). These inputs reflect the fact that portions of structure costs may be shared with other parties (attachment to third party poles rather than owning poles, sharing of joint trenching costs, etc.)

Density	% of Cost Attributed to Carrier Network		
	Aerial	Buried	Underground
Rural	0.48	0.96	0.96
Suburban	0.48	0.80	0.80
Urban	0.48	0.76	0.76

CACM Logic: Using the schematic and overall assumptions described above and from the logic used for the sharing "Between Distribution and Feeder" we know the structure distances. With this information in hand the cost of the structure attributable to the network of the provider under study is developed using the inputs of the "Structure Sharing" table and is rather straight forward as follows:

- For the aerial routes, 48% of the aerial structure (poles) costs are assigned to the provider

For the buried and underground routes (using suburban values as an example), 80% of the buried trench and/or underground structure is assigned to the provider²⁶

14.3. Sharing Of The Middle Mile Network

This input table provides the percent of a interoffice, or middle mile, route that requires dedicated structure (as opposed to sharing structure with feeder and/or distribution cables) across three density categories (i.e., Rural, Suburban and Urban) across three types of plant (i.e., Aerial, Buried and Underground).

Density	% of route that is dedicated structure		
	Aerial	Buried	Underground
Rural	0.37	0.71	0.26
Suburban	0.22	0.64	0.19
Urban	0.14	0.56	0.11

CACM Logic: Using the schematic and overall assumptions provided above the CACM logic for the attribution of costs regarding interoffice (IOF)/Middle Mile facilities is described below.

For interoffice routes, the routing runs from Central Office to Central Office. The logic for feeder and distribution structure captures the full cost of structure within the wire center. It is likely that the interoffice routes will often run along the same routes as used by the feeder and distribution and use the same structure. This table reflects the percentage of the time that interoffice cables do not share structure with feeder and/or distribution cables. In other words, this factor captures a similar kind of sharing as was captured in the section on sharing between distribution and feeder (though these figures represent the amount of dedicated middle mile structure; while the feeder-distribution sharing figures represent the amount of structure that is shared.

The inputs in this table reflect when dedicated structure will be incurred solely for the interoffice routes.

For aerial and underground structure, this sharing will likely be much higher than for buried structure, as shown in the low amount of dedicated structure assumed in the input.

For example, in an urban area the model assumes that structure needed for interoffice routes will be shared with distribution and/or feeder cables (100%-14%), or 86%, of the time and those structure costs are already included in the feeder and/or distribution cost calculations. For 14% of the urban interoffice route distances, the model assumes that separate structure is required for the interoffice cables.

14.4. Sharing of Middle Mile Routes Associated with Voice and Broadband

²⁶ This means, for example, that there is only a 20% chance that an electric, cable or other companies will want to lay fiber along a given route at the same time when the provider has a buried trench open or underground conduit duct available. The sharing of poles is assumed to be much more prevalent (less cost assigned to providers) because other companies do not need to be deploying facilities at the same time in the same place to share the cost of aerial facilities.

Input values (see table below) are based on the assumption that there are two major groups of services traversing the interoffice network: voice/broadband and Special Access services. CACM only includes the interoffice costs associated with the voice/broadband services. This input table provides the percent of an interoffice route that is attributed to voice/broadband across three density categories (i.e., Rural, Suburban and Urban) across three types of plant (i.e., Aerial, Buried and Underground).

Density	% of route that is attributed to Broadband		
	Aerial	Buried	Underground
Rural	50.0%	50.0%	50.0%
Suburban	50.0%	50.0%	50.0%
Urban	50.0%	50.0%	50.0%

CACM Logic: The CACM logic for the attribution of costs regarding the assignment of Middle Mile Routes with Voice/Broadband is described below.

For the feeder and distribution routes, the network is built to handle all services but costs associated with Special Access data services (e.g., high caps) are excluded from the CACM network topology.

The interoffice network is a shared network carrying both voice/broadband and Special Access data (i.e. special access) traffic. CACM calculates the full cost of the interoffice network and this input table then attributes only 50% of the cost of the interoffice network to the voice and broadband-capable network, excluding the other 50% that is assigned to the Special Access data services.

15 Document Revisions

5/22/2013

Updated for version 3.1.2