

This document provides the instructions for FCC Reports 43-01 and 43-08. The instructions consist of the following four sections:

1. Reporting Procedures – a single document which begins on page 2 of these Instructions. Reporting Procedures provide detailed procedures to be followed when submitting these reports to the Commission. This document also includes an illustration of the Transmittal Letter and Certification Statement.
2. Report Definition – multiple documents, one for each ARMIS report, containing the following subsections:
 - a. Summary - description of the form and its reporting burden.
 - b. Form - illustration of the rows and columns to be reported.
 - c. Row Instructions - instructions for completing the rows to be reported.
 - d. Column Descriptions - description of the columns to be reported.
3. Automated Report Specifications – multiple documents, one for each ARMIS report, containing detailed automated data processing (ADP) specifications for the automated report to be filed.
4. COSA Code Table – a single document which lists the four letter COSA codes (CO = Company, SA = Study Area).

A. Introduction

This document contains details on the specific procedures to be followed when submitting the ARMIS FCC Reports 43-01 and 43-08 to the Commission.

A. General Information

1. Orders Adopting the Reports

- a. **Report 43-01:** Adopted by the Commission in the ARMIS Order, *Automated Reporting Requirements for Certain Class A and Tier 1 Telephone Companies (Parts 31, 43, 67, and 69 of the FCC's Rules)*, CC Docket No. 86-182, 2 FCC Rcd 5770 (1987). The report is prescribed for each incumbent local exchange carrier (ILEC) with annual operating revenues for the preceding year equal to or above the indexed revenue threshold. See Order titled *Reform of Filing Requirements and Carrier Classifications; Anchorage Telephone Utility, Petition for Withdrawal of Cost Allocation Manual*, CC Docket No. 96-193, FCC 97-145 (adopted April 22, 1997) and Public Notice titled *Erratum - Annual Adjustment of Revenue Threshold*, DA 10-1016 (June 4, 2010).
- b. **Report 43-08:** Adopted by the Commission in the Common Carrier Bureau in Revision of ARMIS USOA Report (FCC Report 43-02) for Tier 1 Telephone Companies, DA 92-99, 7 FCC Rcd. 1083, 1992. The report is prescribed for each ILEC with annual operating revenues for the preceding year equal to or above the indexed revenue threshold. See Order titled *Reform of Filing Requirements and Carrier Classifications; Anchorage Telephone Utility, Petition for Withdrawal of Cost Allocation Manual*, CC Docket No. 96-193, FCC 97-145 (adopted April 22, 1997) and Public Notice titled *Erratum - Annual Adjustment of Revenue Threshold*, DA 10-1016 (June 4, 2010).

2. Current Revisions

- a. Commission action taken in the *ARMIS Forbearance Order*,¹ impacts ARMIS data filed for reporting year 2010 and beyond. In that Order, the Commission granted

¹ *Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering; Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's ARMIS Reporting Requirements; Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c); Petition of the Embarq Local Operating Companies for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of ARMIS Reporting Requirements; Petition of Frontier and Citizens ILECs for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's ARMIS Reporting Requirements; Petition of Verizon for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's Recordkeeping and Reporting Requirements; Petition of AT&T Inc. For Forbearance Under 47 U.S.C. § 160 From Enforcement of Certain of the Commission's Cost Assignment Rules*, WC Docket Nos. 08-190, 07-139, 07-204, 07-273, 07-21, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 23 FCC Rcd 13647 (2008) (*ARMIS Forbearance Order*), *pet. for recon. pending, pet. for review pending*, *NASUCA v. FCC*, Case No. 08-1353 (D.C. Cir. filed Nov. 4, 2008).

conditional forbearance from carrier obligations to file ARMIS Reports 43-05 and 43-06 provided that the carriers committed to file the data voluntarily for 24 months after September 6, 2008. The 24 months ended on September 6, 2010; and carriers do not file Reports 43-05 and 43-06 for reporting year 2010 and subsequent years.

3. Filing Requirements

- a. **Electronic Filing:** Data for reporting years 1990 and beyond shall be filed electronically as mandated in the 1998 Biennial Regulatory Review - Review of ARMIS Reporting Requirements, *Report and Order in CC Docket No. 98-117, Fifth Memorandum Opinion and Order in AAD File No. 98-43*, released June 30, 1999, FCC 99-107, 14 FCC Rcd 11443 (*ARMIS Review Order*).
- b. **When to File:** For ARMIS FCC Reports 43-01 and 43-08, affected carriers shall file by April 1 for the previous calendar year.
- c. **Filing Level:**
 - i. Report 43-01 is filed at the study area (jurisdiction) level.
 - ii. Report 43-08 is filed at the operating company level.
- d. **Proprietary Treatment:** Carriers seeking proprietary treatment for some data must provide two electronic versions of the automated report. The Confidential Version must contain all the required information. Confidential Treatment Data Records **must** be provided to identify confidential data but are not a substitute for applying for confidential treatment with this Commission following established Commission procedures. The Public Version should neither include data for which the carrier is seeking proprietary treatment nor Confidential Treatment Data Records.

Carriers not seeking proprietary treatment for any data should provide only one electronic version which should be identified as the Unrestricted Version.

- e. **Required Information:** Electronically-Filed Data: for data reporting years 1990 and beyond, carriers must file their ARMIS Reports electronically via the Internet. Header records in the ARMIS Report data files must include the report number, company, study area, period, COSA code, version, and submission number. The report number identifies the ARMIS Report that is being filed. The period identifies the year covered by the data. See the COSA Code Table (CO = Company, SA = Study Area) for a list of companies and their respective COSAs. The version refers to whether the filing is the Confidential, Public or Unrestricted Version. The submission number is defined as follows: submission 0 is for test data purposes only; submission 1 is the first submission of a year's data. A higher number (2, 3, etc.) and a new data entry date must be used each time a change occurs to denote a new submission.

- f. **Upload Comment Field:** Enter the reason for the filing, which must include a brief description of ALL data (including footnotes) that have been added, removed, or modified since the previous submission. This description must agree with what is being filed. The comments should not contain references to IATD letters. Maximum comment length is 245 characters (including spaces). If comment length will exceed 245 characters, include in the comments a reference to the associated transmittal letter by its date, for additional information.
- g. **Transmittal Letter Identification:** All correspondence and pleadings shall identify the proceeding as CC Docket 86-182 for ARMIS Report 43-01 and DA 92-99 for ARMIS Report 43-08.
- h. **Validation:** Each reporting carrier must validate its data by using the most recent edit check program(s), provided by the Commission, for the reporting year. When an error is detected, the carrier must correct the error prior to submitting the report to the Commission.
- i. **ILEC Changes Requiring Additional Information:** When a company makes one or more internal procedural changes that would result in single or multiple data discontinuities, a letter must be filed detailing the nature of and reason for the change(s). The letter must describe both the past and new procedures in enough detail to explain any significant changes in data trends. Optionally, the company may provide this descriptive information in a footnote to the changed data.

B. Data Items That Are "Not Available," "Withheld," or are "Irretrievable"

- 1. **Not Available:** Applicable to all reports, the term "Not Available" is used below to refer only to those items which the Commission has ruled are not applicable to a particular row/column or are not required for a particular filing entity. The Confidential Version must contain values for all of the data items except those items which are "Not Available." If, in addition to the required study area reports, a carrier submits a report which combines data for more than one study area, and this report includes a field such as a sum, a ratio, or a percentage that cannot be computed completely and accurately because it relies on another item which the Commission has ruled is a "Not Available" item, then that field is also considered to be "Not Available."
- 2. **Withheld:** Applicable to all reports, the term "Withheld" is used below to refer only to those items for which the carrier has applied for confidential treatment with the Commission and is only applicable to the Public Version. If a field such as a sum, a ratio or a percentage relies on an item or items which have been withheld and that field is not also withheld, then it must include the withheld amount. For example, a carrier could withhold the individual values for two of three numbers, which are totaled. If the carrier does not also apply for confidential treatment for the total, then that total must be the sum of all three numbers, not just the one, which was not withheld. The Public Version must contain values for all of the data items except those items which are "Not Available" or those items which have been "Withheld."

3. **Irretrievable:** Applicable to Report 43-08, the term "Irretrievable" is reserved for data items that are not being reported because the filing carrier has a waiver or has applied for a waiver.

4. See the Automated Report Specifications for data entry conventions for these items.

C. **Where to File** Electronic submission of ARMIS reports is made through the Internet by selecting the applicable link on the web page at <http://www.fcc.gov/wcb/eafs/upload/>.

D. **Footnotes**

1. **General:**

- a. For initial (annual) filings, if any data for the current period differ materially from those for the previous period and the difference is not self-explanatory but was caused by unusual circumstances, the carrier must include detailed footnote text to explain the specific circumstances. For resubmission filings, footnotes must be provided for all changed data, which includes changed footnotes. When a summary row value changes because of changes to one or more of its detail rows, the summary row must also be footnoted.
- b. Footnotes should be filed for the entities to which they apply: a footnote might apply to a holding company COSA only, to a study area COSA only, or to both entities. (However, footnotes should not be submitted at the holding company level if they apply only to a company's study areas.)
- c. If the reporting carrier does not follow the procedures described in the row and column instructions of the applicable Report Definition, it must explain any deviations from those procedures in an explanatory footnote. Such footnotes must provide detailed explanations of the procedures actually used by the carrier and its specific reasons for deviating from procedures prescribed by the Commission's Rules. This provision should not be interpreted to mean that deviations from the prescribed rules will automatically be approved by the Commission.

EXAMPLES:

Do not say, "Data are compiled using a more inclusive process than in previous filing."

Do say, "Data are compiled using a process that includes xxx, which was not included in previous filings. The impact of including xxx in this row inflates this number by x% over the previous reporting period."

Do not say, "This value was not calculated pursuant to the instructions."

Do, say "This value was calculated using the xxx method rather than the method described in the instructions because..."

Do not say, "Submission corrects data that was incorrect in previous submission."
Do say, "\$xxxx is changed to \$xxxx because ...".

Do not say, "Waiver" or Waiver Granted."

Do say, "Waiver of Part xx.xxx was granted in CC Docket No. xx-xxx, X
FCC, xxxx (1992) to allow Any Company tobecause...."

- d. Footnote entries must provide detailed explanations for only those items reported in the current submission. Footnotes from prior submissions should be included only if they remain applicable. In other words, when a resubmission nullifies an existing footnote, remove the footnote.
 - e. The footnote text must be included in the Footnote Text Records as specified in the Automated Report Specifications.
2. **Mandatory:** Certain items require accompanying footnotes and those items are specified in the appropriate section of the instructions for filing the reports. Such footnotes are mandatory and must be entered in the Footnote Text Records. Examples of items with mandatory footnote requirements are Irretrievable Data items. In addition, any row/column data entry in any ARMIS Report which contains UNE data must be accompanied by an explanatory footnote identifying the types of UNEs (e.g., "UNE-P") that are included.

3. **Footnote Structure:**

Observe the footnote specifications to the letter and strive for an efficient footnote structure. Reduce the size and number of footnotes by using global and referring footnotes.

Global Footnotes

- a. If a footnote applies to an entire table, its row number is 9999.0, and its column letter is ZZ;
- b. If a footnote applies to all columns within a single row, its column letter is ZZ;
- c. If a footnote applies to a single column within all rows, its row number is 9999.0;
- d. If a footnote applies to a majority of (but not all) columns within a single row, its column letter is ZZ, and its text should include the identity of the columns to which the footnote applies;
- e. If a footnote applies to a single column within a majority of (but not all) rows, its row number is 9999.0, and its text should include the identity of the rows to which the footnote applies;

Referring (non-Global) Footnotes

- f. If a footnote applies to more than one, but less than a majority of rows or columns, use individual referring footnotes for the rows or columns to refer to a single explanatory footnote. The referring footnote must include the explanatory footnote's number, row, and column;
- g. Referring footnotes and the footnotes to which they refer should be in the same table.

Footnote Removal

- h. For resubmissions, remove footnotes if they no longer apply, and renumber the remaining footnotes.
- i. When removing one or more footnotes from a table that were erroneously included in a previous filing, provide a single explanatory footnote that includes a list of the affected rows and columns. This footnote's record number for the footnoted data is 9999 (field 4), its table number is ZZZZ, its row number is 9999.0, and its column letters are ZZ.

E. Errata

1. Carriers are under a legal obligation to correct any erroneous data, which includes footnotes, reported in ARMIS Reports. Thus, whenever there are changes in table data, footnotes are added, footnotes are removed because they were erroneously-filed, or the text of an existing footnote is changed, an erratum (and resubmission) is required. See Section B of the Reporting Procedures for the use of submission numbers when an erratum occurs.
2. Submissions containing corrected data must include references to indicate which data items were corrected since the previous submission. If the data items being corrected impact other data items in the report, then those items must also be corrected and referenced. Erratum references should reflect only those items corrected in the new submission. References from prior submissions must not be included in the new submission.
3. Current data references must be included in the Erratum Record(s).
4. If errata are filed for reporting year 2007 or earlier, carriers should refer to the Reporting Procedures for the reporting year being corrected.

5. Errata Structure:

Observe the errata record specifications to the letter, and strive for proper structure.

- a. An errata record should reference more than one column, if multiple—but not all—columns are affected for the same row. (Where all columns are affected use “ZZ” as the column reference.)

- b. When a footnote column field contains “ZZ” to indicate multiple—but not all—columns, the errata record column field should not use “ZZ.” Instead, list the columns affected in this field.
- c. The errata record should reference the footnote number to which it applies.
- d. For Submission Number 3 or higher, be careful to clear the errata table of entries from previous filings, prior to adding new errata entries for the new submission.
- e. When removing one or more footnotes from a table that were erroneously included in a previous filing, the erratum record should refer to a single footnote explaining the removed footnote(s). In the erratum record, use 9999 for the record number of the corrected data (field 4), ZZZZ for the table number, 9999.0 for the row number, and ZZ for the column letters.

F. **Related Documents**

1. **Document Conversion Requirements:** The related documents (described in items 2 and 3, below) must be converted to Adobe Acrobat’s Portable Document Format (PDF) directly through a word-processing application or through the use of a scanning device, prior to submitting the documents to the Commission. Other than a letterhead graphic, the documents to be converted should consist of text only—no graphics. Conversion of a document to PDF should result in a black and white document with a resolution no greater than 300 dpi, and having a file size no more than 40 to 50 Kb per page.
2. **Transmittal Letters:** Each ARMIS report submission must be accompanied by a letter of transmittal. When filing confidential data, a separate letter is required. These letters must be on official company letterhead and contain the following information:
 - a. References to applicable IATD letter numbers and dates; and
 - b. The ARMIS Report, reporting year, report version (Confidential, Public, or Unrestricted), COSA, and company/study area name impacted by the filing. When covering a resubmission, enter the submission number and the reason for the filing, which must include a brief description of **all** data (including footnotes) that have been added, removed, or modified. This description must agree with what is being filed. (See Attachment A for a sample transmittal letter.) Detailed instructions for including the transmittal letter in the submission are provided in the Automated Report Specifications for each ARMIS report.

3. **Certification Statements:**

- a. **Reports:** Carriers must certify the accuracy of the data submitted in the ARMIS Reports by including a certification statement, signed by a corporate officer. The statement must identify the ARMIS Report, report version, COSA, and company/study area name. The submission number for all COSAs (including initial submissions) must be included in the statement.

For resubmissions, place an asterisk to the immediate right of the submission number of each COSA resubmitted with this filing, i.e., for any COSAs for which data (including footnotes and errata) have changed since the previous submission. The COSAs with asterisks must match the COSA list provided in the transmittal letter for the resubmission. Once an asterisk no longer applies, it must be removed. At the bottom of the COSA column, place the footnote: “* Changed since the previous submission.” (See Attachment B for the text of the certification statement.) Detailed instructions for including the certification statement in the submission are provided in the Automated Report Specifications for each ARMIS report.

- b. **Part 64 Certification:** Mid-sized incumbent local exchange carriers, as defined by Part 32.9000, shall certify compliance with Part 64.901 of the Commission’s rules (see Part 64.905) by filing a certification annually. Certifications must be (i) signed, under oath, by an officer of the company, (ii) display an official company letterhead, and (iii) list all operating companies impacted by the filing. Detailed instructions for including the certification in the electronic submission of the ARMIS Report 43-01 are provided in the Automated Report Specifications.

G. **Waivers**

1. If a carrier determines that it will be unable to provide data required by an ARMIS report, it must file an application for waiver with the Commission following established Commission procedures. All such requests from a carrier should be included in a single application. The application must demonstrate good cause for reporting a different or lower level of detail and indicate how these deficiencies will be corrected.
2. Carriers should not act upon requests for waiver until waivers are granted. It is important that carriers be aware that waivers are not in effect until they are granted, in writing, by the Commission or under delegated authority.
3. Omission of individual data items or entries, without request for waiver, is unacceptable. One reason that compliance with the full requirements is so important is that omission of any single data entry by any carrier will jeopardize the accuracy of aggregate industry information.

- H. **Extension of Filing Time:** Requests for extensions of filing time must be made in a timely manner. Requests received less than 72 hours prior to a filing date are prima facie unreasonable.

I. Public Information

1. ARMIS report data and reporting procedures (instructions) are accessible through the Commission's ARMIS web page at <http://www.fcc.gov/wcb/armis/>.
2. Public Internet Access is available at the FCC Reference Information Center (RIC), 445 Twelfth Street, S.W., Washington, D.C. Parties should contact the RIC at (202) 418-0270.

J. Contact Information

1. **Carriers:** Carriers requiring further information regarding these procedures, contact: Barbara Van Hagen, FCC Wireline Competition Bureau, Industry Analysis and Technology Division, (202) 418-0840.
2. **Public:** Questions from the public about ARMIS should be directed to armis-hp@fcc.gov.

SAMPLE TRANSMITTAL LETTER

<Company's letter head>

<Dated>

Federal Communications Commission
 Office of the Secretary
 445 Twelfth Street, S.W.
 Washington, DC 20554

IATD Reference No.: *(List IATD Reference Number(s) and date(s), e.g., IATD 2011-01, 04/04/2010)*

ARMIS Report: *(Only one ARMIS Report per transmittal letter, e.g., FCC Report 43-08)*

Year of Data: *(Only one year per transmittal letter, e.g., 2010)*

Report Version: *(Only one version per transmittal letter, e.g., Confidential)*

Dear Ms. Dortch:

<Transmittal Letter Identification (*see Reporting Procedures, Section B*) (e.g., "Pursuant to the Commission's rulings in DA 92-99, the following 2010 ARMIS report...")>

<For resubmissions provide the COSA and its submission number with a brief descriptive explanation of data corrected. If there are multiple COSAs filed for the same reason, see example below.>

One-COSA example:

"Illinois Bell (LBIL), Submission No. 2, is filed to correct data reported in Table III, column (fi). Column (fi) is the summation of columns (fc) through (fe), which was reported incorrectly, due to a keying error in the previous submission."

Multiple-COSAs example:

<u>COSA</u>	<u>Submission No.</u>
LBIL	2
NBIN	2

"The above Ameritech COSAs are filed to correct data reported in Table III, column (fi). Column (fi) is the summation of columns (fc) through (fe), which was reported incorrectly, due to a keying error in the previous submissions."

(Note: A transmittal letter may contain multiple reasons for multiple COSAs or one COSA with multiple reasons but only for one report and one year.)

<Any other pertinent information>

<List of Enclosures>

CERTIFICATION

I certify that I am an officer of <Company>; I have examined ARMIS Report <Report Number>, version <Confidential, Public, or Unrestricted> and to the best of my knowledge, information, and belief, all statements of fact contained in this report are true and said report is an accurate statement of the affairs of the above named respondent in respect to the data set forth herein for the period from <01/01/200X> to <12/31/200X>.

This certification is for the following company/study area(s):

<List the submission number for all COSAs, including initial submissions.>

<u>COSA</u>	<u>Company/Study Area(s)</u>	<u>Submission</u>
LBIL	AT&T/Ameritech – Illinois Bell	2 *
NBIN	AT&T/Ameritech – Indiana Bell	2 *
MBMI	AT&T/Ameritech – Michigan Bell	1
OBOH	AT&T/Ameritech – Ohio Bell	1

*** Changed since the previous submission**

PRINTED NAME:

POSITION:

SIGNATURE:

DATE:

(Persons making willful false statements in this report form can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).)

CONTACT PERSON:

TELEPHONE NUMBER:

EMAIL ADDRESS: