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WIRELINE COMPETITION BUREAU ANNOUNCES ENHANCED ALTERNATIVE CONNECT AMERICA COST MODEL SUPPORT AMOUNTS OFFERED TO RATE-OF-RETURN CARRIERS TO EXPAND RURAL BROADBAND

WC Docket No. 10-90

Today, the Wireline Competition Bureau (Bureau) announces the offers of model-based Enhanced A-CAM support based on a revised version of the Alternative Connect America Cost Model (A-CAM) 2.6.0 to existing A-CAM carriers and other carriers that are still receiving legacy support to fund the deployment of voice and broadband-capable networks in their service territories, and provides further guidance regarding Enhanced A-CAM processes and procedures.¹ Carriers have until **Friday**, **September 29, 2023** to indicate, on a state-by-state basis, whether they elect to receive Enhanced A-CAM support.²

Offers. The model results and offer amounts we release today are predicated upon carriers receiving support for Enhanced A-CAM required locations calculated using a monthly funding threshold of \$63.69, a funding cap per location of \$350, and an alternative funding percentage of 80%, except that required locations in Tribal lands are subject to a funding threshold of \$47.76 and a funding cap of \$365.93.

The offer amounts also include support based on what the carrier (i.e., the incumbent local exchange carrier, or ILEC) currently receives for locations to which it has already deployed 100/20 Mbps or faster broadband but which unsubsidized competitors neither already serve nor are subject to enforceable commitment to serve.³ Specifically, a carrier's offer includes 60% of the carrier's current A-CAM support level for existing ILEC-only served locations,⁴ including those locations for which the ILEC may have received a loan or grant to deploy broadband, but excluding locations for which an unsubsidized competitor is receiving funding (e.g., a loan or grant). The offer includes 33% of the carrier's current support level for (a) ILEC-only served locations for which a competitor is receiving

¹ See Connect America Fund; ETC Annual Reports and Certifications; Telecommunications Carriers Eligible to Receive Universal Service Support; Connect America Fund – Alaska Plan; Expanding Broadband Service Through the ACAM Program, WC Docket Nos. 10-90, 14-58, 09-197, and 16-271; RM-1168, Report and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 23-60, at 42, para. 98 (July 24, 2023) (Enhanced A-CAM Order).

² Carriers that decline the Enhanced A-CAM offer will continue to receive existing A-CAM or CAF BLS support and will continue to be subject to the same broadband deployment obligations.

³ See Enhanced A-CAM Order at 31-33, paras. 73-75. The offers also include support for locations served with 100/20 Mbps service by the ILEC only, but which were ineligible for prior A-CAM offers. *Id.* at 32, para. 74.

⁴ See Connect America Fund; ETC Annual Reports and Certifications; Telecommunications Carriers Eligible to Receive Universal Service Support; Connect America Fund – Alaska Plan; Expanding Broadband Service Through the ACAM Program, WC Docket Nos. 10-90, 14-58, 09-197, and 16-271; RM-1168, Order, DA 23-778, at 4-6, para. 9-13 (WCB Aug. 30, 2023) (Enhanced A-CAM Implementation Order).

funding to deploy 100/20 Mbps or faster broadband service, and (b) locations currently served by both the ILEC and a competitor with 100/20 Mbps or faster broadband.⁵ The locations included in the initial offers are based on location data from the Broadband Serviceable Location Fabric (Fabric) v.2 and account for broadband coverage data from the National Broadband Map, as well as federal broadband funding data from the Broadband Funding Map.⁶

The information released today includes four reports.⁷ Report 1.1 shows the state-level offer of model-based support for each carrier that is eligible to elect Enhanced A-CAM support, including the amount of annual support that would be provided over the 15-year term beginning January 1, 2024, subject to any transitional support amounts as discussed below. Report 1.1 also shows the total number of locations in the carrier service area covered by the offer of support, and the number of supported locations, which includes both required locations with estimated costs above the \$63.69 support threshold (\$47.76 for Tribal locations) and ILEC-served locations above the existing A-CAM support thresholds. Finally, Report 1.1 breaks out Enhanced A-CAM support amounts and supported locations by Tribal and Non-Tribal locations.

All carriers authorized to receive Enhanced A-CAM support will be subject to defined deployment obligations that must be met by the final deployment milestone in 2028, with an additional 12 months to come into compliance for the final deployment milestone, and with annual reporting of their progress. Report 1.2 shows the number of required locations – both above and below the support threshold – to which an electing carrier will be required to deploy 100/20 Mbps service, in total and by Tribal or Non-Tribal status. Report 1.2 also summarizes locations by ILEC- and competitor-served status. Carriers that elect Enhanced A-CAM will commit to maintaining at least existing levels of service to locations to which they currently provide 100/20 Mbps or faster service. For completeness, Report 1.2 also shows other categories of locations that do not factor into the support calculation, such as locations served with 100/20 Mbps that have estimated costs below the A-CAM I or II support thresholds, or locations served solely by an unsubsidized competitor or subject to an enforceable commitment to deploy. In addition to the summary information provided in Report 1.2, carriers considering electing Enhanced A-CAM can identify their required locations and the locations that they currently serve and to which they must maintain service on the ACAM website, https://cacm.usac.org/. Required locations

⁵ See Enhanced A-CAM Order at 32-33, para. 75.

⁶ See id. at 20, para. 42. To avoid unnecessarily duplicating federal broadband funding, the Bureau also uses data from other federal agencies to exclude from the set of Enhanced A-CAM required locations any locations that are subject to enforceable commitments to deploy 100/20 Mbps or faster broadband service. See id. As more complete data on federal and state commitments become available, the Bureau and the Office of Economics and Analytics will also adjust carriers' list of required locations, with all adjustments to be completed no later than December 31, 2025. See id. at 21, para. 43. "[T]he Bureau and the Office of Economics and Analytics will ultimately rely on Fabric v.3 and the National Broadband Map showing broadband serviceable locations as of June 30, 2023 for these adjustments." See id. at 21 n.146. The support amounts associated with each Enhanced A-CAM carrier may also be adjusted pursuant to the methodologies outlined in the Order we concurrently adopt today. See Enhanced A-CAM Implementation Order at 6-7, paras. 14-16.

⁷ Available at https://docs.fcc.gov/public/attachments/DOC-396477A1.xlsx.

⁸ See 47 CFR § 54.320(d)(2) (providing carriers an additional 12 months to come into compliance for their final milestones). The Commission also delegated to the Bureau the authority to extend the final deployment milestone by an additional year. See Enhanced A-CAM Order at 22, para. 46.

⁹ In Report 1.2, locations that are currently unserved and also subject to an enforceable commit to deploy by the ILEC due to a grant from another federal agency are included with competitor-served locations, which also receive no support under Enhanced A-CAM.

Access to the A-CAM data are subject to the Third Supplemental Protective Order, a licensing agreement and a non-disclosure agreement (respectively Appendices B and C) available at https://docs.fcc.gov/public/attachments/DA-12-1995A1.pdf. Parties who have signed the licensing and non-(continued....)

(i.e., locations where voice and terrestrial broadband services of speeds 100 Mbps downstream/20 Mbps upstream or faster are not yet available or lack an enforceable commitment for deployment of such broadband service) and ILEC-served locations (to which an electing carrier would be required to maintain existing 100/20 Mbps or faster service) are identified by location ID.

Report 1.3 shows the amount of support, by year, that a CAF BLS recipient electing Enhanced A-CAM will receive over the term of Enhanced A-CAM. As discussed in greater detail below, this includes all transitions provided by the Commission's rules.

Carriers will receive a single offer of support for all affiliates within a state. ¹¹ If a carrier offer for a state either includes an unaffiliated entity or excludes an affiliated ILEC in that state, the ILEC should report this by sending an email to ConnectAmerica@fcc.gov notifying the Commission of this error prior to accepting an Enhanced A-CAM offer. If a carrier has multiple affiliates in a single state, some of which receive A-CAM support and some of which receive Connect America Fund Broadband Loop Support (CAF BLS) (mixed support carriers), Report 1.1 shows separately Enhanced A-CAM support amounts for A-CAM and CAF BLS affiliates. However, consistent with the transition payments adopted by the Commission for CAF BLS carriers, the actual amount of support received annually will be reflected in Report 1.3. Therefore, to understand the amount of support that would be authorized, mixed support carriers must review the transitional payments for the relevant state. Mixed support carriers that elect to participate in the Enhanced A-CAM mechanism, must elect for both their A-CAM and CAF BLS components. A list of known mixed support carriers is shown in Report 1.4.

Carriers considering electing Enhanced A-CAM need to evaluate on a state-level basis whether the support to be received is sufficient to serve all their required locations with 100/20 Mbps or faster broadband service. For administrative ease, compliance with the broadband deployment obligations will be validated at the state level.

Elections. Carriers shall submit their election letters to the Bureau at ConnectAmerica@fcc.gov. 12 To elect Enhanced A-CAM for a state or states, a carrier must submit a letter signed by an officer of the company confirming that the carrier elects the Enhanced A-CAM support amount as specified in Report 1.1 released today and commits to satisfy the specific service obligations associated with that amount of model support, including both the deployment of 100/20 Mbps or faster service to all required locations and the maintenance of 100/20 Mbps or faster service to currently served locations. Carriers are required to identify in their election letters the technologies they plan to use to meet their Enhanced A-CAM deployment obligations. 13 Election letters filed by mixed support carriers should explicitly acknowledge that the election applies to both their A-CAM and CAF BLS study areas within a state. As directed by the Commission, the Bureau will publish Enhanced A-CAM offer acceptances "to inform, among other processes, the BEAD Program challenges conducted by states or eligible entities and prevent any duplication of support to a location where it is determined that the Enhanced A-CAM service provider plans to deploy a technology that would satisfy the requirements for being deemed an enforceable commitment for the deployment of qualifying broadband to a location." 14

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¹¹ See Enhanced A-CAM Order at 45, para. 98 ("Like with A-CAM II, elections will be voluntary, irrevocable, and made on a state-by-state basis.").

¹² Carriers are encouraged to submit their election letter prior to the deadline to the extent feasible.

¹³ See Enhanced A-CAM Order at 42-43, para. 100.

¹⁴ *Id.* at 43, para. 100.

We emphasize that carriers accepting the Enhanced A-CAM offer should therefore *not* include any confidential trade secrets or commercial information in their election letters.¹⁵

If a carrier fails to submit any final election letter by the **September 29, 2023** deadline, the carrier will be deemed to have declined the Enhanced A-CAM offer and will continue to receive support under its existing program and be subject to its existing A-CAM I, Revised A-CAM I, A-CAM II, or CAF BLS deployment obligations. Carriers submitting election letters will receive an e-mail confirming that their letters have been received and reviewed for completeness and should contact the Bureau no later than 4:00 p.m. Eastern Daylight Time on **October 2, 2023** if they do not receive such confirmation. Confirmation of receipt does not constitute authorization to receive Enhanced A-CAM support pursuant to the terms of the offer. Carriers electing the Enhanced A-CAM support will not begin receiving such support until the Bureau issues a public notice authorizing the Universal Service Administrative Company (USAC) to disburse the appropriate amounts.

Legacy rate-of-return carriers electing Enhanced A-CAM support must exit the National Exchange Carrier Association, Inc. (NECA) common line tariff pool before they will be authorized to receive model-based support. These carriers, however, may continue to tariff non-pool rates for common line and consumer broadband-only loops pursuant to NECA tariffs. NECA carriers electing Enhanced A-CAM support must notify NECA by the date specified in the public notice announcing Enhanced A-CAM authorizations that they will no longer participate in the NECA common line tariff pool. USAC may disburse Enhanced A-CAM support once it confirms that the electing Enhanced A-CAM carrier notified NECA that they will exit the NECA common line tariff pool. 18

Enhanced A-CAM support recipients that have not already done so are also eligible to transition certain business data service (BDS) offerings to incentive regulation under section 61.50 of the Commission's rules. ¹⁹ All rate-of-return carriers accepting Enhanced A-CAM support and electing BDS incentive regulation must notify the Bureau of their BDS election by May 1, 2024 to be effective concurrent with the July 2024 annual access charge tariff filing. ²⁰ These carriers should file a letter in WC Docket No. 17-144 notifying the Bureau of their BDS election including the carrier, study area, state, and study area code. ²¹ Enhanced A-CAM carriers that elect BDS incentive regulation may begin detariffing their BDS offerings after the effective date of their BDS election but must detariff their BDS offerings within 36 months after the effective date of their election of BDS incentive regulation. ²²

¹⁶ *Id.* at 39, para. 91 (citing *2016 Rate-of-Return Reform Order*, 31 FCC Rcd at 3159-60, paras. 194-96). NECA Tariff F.C.C. No. 5 covers the carrier common line tariff pool.

¹⁵ See id.

¹⁷ See 47 CFR § 69.3(e)(9).

¹⁸ Enhanced A-CAM Order at 39, para. 91.

¹⁹ 47 CFR § 61.50; *Regulation of Business Data Services for Rate-of-Return Local Exchange Carriers, et al.*, WC Docket No. 17-144 et al., Report and Order, Second Further Notice of Proposed Rulemaking, 33 FCC Rcd 10403, 10421-22, para. 44 (2018) (*Rate-of-Return BDS Order*).

²⁰ 47 CFR § 61.50(1)(3); Rate-of-Return BDS Order, 33 FCC Rcd at 10445, para. 119.

²¹ See Wireline Competition Bureau Announces Rate-of-Return Carriers Electing Incentive Regulation for their Business Data Services, WC Docket No. 17-144, Public Notice, 35 FCC Rcd 7037, 7037 (WCB 2020) (a total of 136 rate-of-return carriers serving 227 study areas in 40 states and one territory elected BDS incentive regulation).

²² 47 CFR § 61.50(k)(3) ("A rate-of-return carrier electing incentive regulation for its business data services must detariff: (i) All packet-based and time division multiplexed business data services above a DS3 bandwidth within thirty-six months after the effective date of its election of incentive regulation; and (ii) All time division multiplexed end user channel termination business data services at or below a DS3 bandwidth in any study area deemed competitive by the competitive market test within thirty-six months after such services shall be deemed competitive in a study area.").

Additionally, NECA carriers accepting Enhanced A-CAM support and electing BDS incentive regulation must notify NECA by March 1, 2024 that they will not participate in the NECA traffic-sensitive tariff pool for their BDS offerings.²³ Such carriers may continue to participate in the NECA traffic sensitive pool and tariff for access services other than BDS.²⁴ In its notices to NECA and the Bureau, each carrier should specify whether it is choosing to update its separation category relationships.²⁵

Transitional Support for Legacy Carriers. The Commission in the Enhanced A-CAM Order adopted rules allowing for the extension of offers for Enhanced A-CAM support amounts to electing legacy carriers pursuant to a fixed support transition, or "glide path," process. 26 The Enhanced A-CAM offers, and the methodology used to calculate the support amounts, reflect the transition process adopted by the Commission. We provide the following informational guidance for legacy carriers considering electing Enhanced A-CAM support.

• Transitioning from Higher to Lower Support Amounts. When transitioning from receiving higher to lower amounts of support, electing legacy carriers will receive frozen support equal to their year 2022 support claims for six years, beginning January 1, 2024.²⁷ Over the next five years, beginning January 1, 2030, their support will step down to 80% of their 2022 support amount, in 4% increments.²⁸ Finally, beginning January 1, 2035, and ending on December 31, 2038, electing carriers will then transition to model-based Enhanced A-CAM support, following the three-tiered transition schedule set forth in section 54.311(e)(1)-(3) of the Commission's rules.²⁹

The transition payments are based on the percentage difference between model support and legacy support: if the difference between legacy and model-based support is 10% or less, the carrier will have a one-year transition; if greater than 10% but not more than 25%, then the transition period will be four years; and if the difference is greater than 25%, then the transition will occur over the full-term of the plan, with no extra transition support only in the final year of the term.³⁰ As the Commission stated in the Enhanced A-CAM Order, "[f]or the purpose of calculating transitional support pursuant to this final stage, we adopt a base year support amount equal to 80% of 2022 claims."³¹

²³ See 47 CFR § 69.3(i)(1); see also id. § 69.3(e)(6); Rate-of-Return BDS Order, 33 FCC Rcd at 10445, para. 119. The NECA traffic-sensitive pool is contained in NECA F.C.C. Tariff No. 5.

²⁴ 47 CFR § 61.50(d).

²⁵ Rate-of-Return BDS Order, 33 FCC Rcd at 10445, para. 119.

²⁶ Enhanced A-CAM Order at 35-38, paras. 79-87. While carriers that previously elected A-CAM I or II were required to elect for all affiliated study areas in the state, there may be cases where, due to intervening transactions, a legacy carrier is affiliated with an existing A-CAM participant that elects Enhanced A-CAM. If this situation arises, then the Bureau, for the purpose of calculating transitional support amounts, will assign to the legacy CAF BLS study area(s) the Enhanced A-CAM amount calculated for only the CAF BLS study areas and assign to the A-CAM study areas the difference between the amount calculated for all affiliated study areas in the state and the CAF BLS-only amount.

²⁷ *Id.* at para. 80. For reference, legacy carriers' 2022 support claims are available at https://www.fcc.gov/sites/default/files/Updated%20Claims%20for%20Web%202022%20%2804%202023%29.xlsx.

²⁸ Enhanced A-CAM Order at 35-38, paras. 79-87 (codified at 47 CFR 54.311(e)(4)-(5)(i)).

²⁹ *Id.* (codified at 47 CFR § 54.311(e)(5)(ii)-(vi)).

³⁰ *Id.* (codified at 47 CFR § 54.311(e)(1)-(3)).

³¹ *Id.* at 35-36, para. 81.

While the transition process provided for in section 54.311(e)(1)-(3) envisions a ten-year transition period, there will only be a four-year period over which legacy carriers will transition pursuant to these subsections during years 2035-2038, i.e., over the last four years of the Enhanced A-CAM term of support.³² Accordingly, as the Commission stated, "[i]n those cases, [where] the carriers' support would begin to approach the amount of the Enhanced A-CAM offer, but would not reach that level before the end of the term of support," then "[w]e do not intend for such carriers to have a longer term of support than we adopt for Enhanced A-CAM generally."³³ That is, the transition support amount in year 2038 would be the final year in the Enhanced A-CAM term of support so that the legacy carrier could conceivably never fully transition to the Enhanced A-CAM support amount by the end of the term.

As an illustrative example, assume an electing legacy carrier's 2022 support claims total \$1,000,000 and the Enhanced A-CAM support amount is \$700,000. In this case, the transition path would be as follows:

Calendar Year	Support Amount	Explanation
2024-2029	\$1,000,000	2022 support claim amount
2030	\$960,000	\$1,000,000 - (\$1,000,000 x .04)
2031	\$920,000	\$1,000,000 - (\$1,000,000 x .08)
2032	\$880,000	\$1,000,000 - (\$1,000,000 x .12)
2033	\$840,000	\$1,000,000 - (\$1,000,000 x .16)
2034	\$800,000	\$1,000,000 - (\$1,000,000 x .20)
2035	\$760,000	Per 47 CFR § 54.311(e)(3), reduction is the greater of either: a) 5% x \$800,000 (i.e., the base period amount) = \$40,000, or b) 10% x \$100,000 (i.e., the difference between the Enhanced ACAM amount, \$700,000 and the base period amount, \$800,000) = \$10,000.
2036	\$720,000	\$40,000 > \$10,000 and \$760,000 - \$40,000 = \$720,000
2037	\$700,000	As above except that \$720,000 - \$40,000 = \$680,000, which is less than \$700,000, the Enhanced A-CAM support amount, so the \$700,000 applies
2038	\$700,000	Enhanced A-CAM support amount

• Transitioning from Lower to Higher Support Amounts. For an electing legacy carrier whose 2022 claims are less than its Enhanced A-CAM support offer, the Commission provided a transition to the carrier's full Enhanced A-CAM support over a five-year period after an initial six-year freeze.³⁴ In years 2024-2029, the electing legacy carrier will receive

³² See 47 CFR § 54.311(c).

³³ Enhanced A-CAM Order at 36, para. 81 n.236.

³⁴ See id. at 82, para. 82 (codified at 47 CFR § 54.311(f)).

its 2022 frozen base year support.³⁵ Support will then be increased by 20% of the difference between its base year support and its Enhanced A-CAM support, each year during the 2030-2033 period.³⁶ Starting in 2034 and throughout the remainder of the support term, i.e., until December 31, 2038, the legacy carrier will receive the Enhanced A-CAM support amount.³⁷

• Carriers Currently Receiving A-CAM Transition Payments. Some current A-CAM carriers are receiving transition payments from their previous legacy support to their model-based support. Pursuant to section 54.311(e)(6), this transitional support will not be adjusted to reflect Enhanced A-CAM support amounts.³⁸ Accordingly, A-CAM I and A-CAM II carriers that are currently transitioning from their legacy support amounts to A-CAM I, Revised A-CAM I, or A-CAM II support amounts will continue receiving transitional support on their current glide path until their transitional support is less than their authorized Enhanced A-CAM support amount.³⁹ If a carrier is currently receiving transitional support, and its authorized Enhanced A-CAM support is less than its authorized A-CAM I or A-CAM II support, it will receive the Enhanced A-CAM support amount in the first year after its current glide path ends.

Mutual Agreements to Forgo Support and Obligations in Tribal Areas. In situations where "a state awards BEAD funds to another service provider to serve locations subject to an Enhanced A-CAM authorization," the Commission "permit[s] the Enhanced A-CAM carrier and the Tribal government to notify the Bureau that they mutually agree to forego the A-CAM deployment obligation," after which the Bureau will adjust the Enhanced A-CAM recipient's support and deployment obligations.⁴⁰ Any such adjustments will not be considered a default under the Enhanced A-CAM program.⁴¹

To streamline administrative processing of such mutual agreements, we require that any such notice of an agreement be submitted to the Bureau at ConnectAmerica@fcc.gov, and must include signatures by an officer of the Enhanced A-CAM carrier as well as a representative of the Tribal government. Such notices must also be submitted before July 1, 2025, to provide ample time for the Bureau and the Office of Economics and Analytics to account for the changes in obligations and support before December 31, 2025.

Comments Regarding Coverage by Unsubsidized Competitors. Given that the Commission has required that carriers accept offers before September 29, 2023, and that the Bureau will announce accepted offers to inform other programs' challenge processes and help prevent duplicative funding, there

³⁵ *Id.* (codified at 47 CFR § 54.311(f)(1)(i)).

³⁶ *Id.* (codified at 47 CFR § 54.311(f)(1)(ii)-(v)).

³⁷ *Id.* (codified at 47 CFR § 54.311(c), (f)(1)(vi)).

³⁸ *Id.* (codified at 47 CFR § 54.311(e)(6)).

³⁹ See A-CAM Support Authorized April 29, 2019 – Revised Offers for Carriers That Elected Initial A-CAM Offer with Legacy Transition Payments, May 1, 2019, available at https://www.usac.org/wp-content/uploads/high-cost/documents/spreadsheets/A-CAM-Support-Authorized-April.29.2019.xlsx; ACAM II Support with Legacy Transition Payments, June 5, 2019, available at https://www.usac.org/wp-content/uploads/high-cost/documents/spreadsheets/ACAM-II-Support-with-Legacy-Transition-Payments.xlsx.

⁴⁰ Enhanced A-CAM Order at 45, para. 105.

⁴¹ *Id.* at 45 n.301.

⁴² See id. at 45 n.301 ("We direct the Bureau to specify the form, substance, and timing of such letters.").

⁴³ See id. at 21, para. 43 ("We anticipate that the Bureau will make all adjustments to the required deployment locations no later than December 31, 2025.").

will not be an opportunity to make changes to any offers prior to the Bureau's announcement.⁴⁴ Adjustments to support amounts and location counts will be made at a later date consistent with the *Enhanced A-CAM Order*.⁴⁵ Any concerns regarding the deployment areas or speed of unsubsidized competitors should be addressed through the Broadband Data Collection processes. To the extent that interested parties may have concerns about an unsubsidized competitor's usage or the provision of voice service, we will accept comments in this proceeding's docket, WC Docket No. 10-90, regarding whether particular unsubsidized competitors may not be providing the minimum amount of usage set forth in the Urban Rate Survey⁴⁶ or whether unsubsidized competitors may not be providing standalone voice service.⁴⁷

For additional information on this proceeding, please contact Stephen Wang (Stephen.Wang@fcc.gov) of the Wireline Competition Bureau, Telecommunications Access Policy Division, (202) 418-7400.

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⁴⁴ See id. at 43, para. 100.

⁴⁵ See id. at 16-17, para. 34; supra note 4.

⁴⁶ The 2023 Urban Rate Survey specifies a minimum usage amount of 600 GB. See Wireline Competition Bureau And Office of Economics and Analytics Announce Results of 2023 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers, Public Notice, WC Docket No. 10-90, DA 22-1338 (WCB Dec. 16, 2022).

⁴⁷ See Enhanced A-CAM Order at 19, para. 39.