



PUBLIC NOTICE

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WIRELINE COMPETITION BUREAU REMINDS RURAL DIGITAL OPPORTUNITY FUND SUPPORT RECIPIENTS OF UPCOMING MILESTONES AND NOTIFICATION REQUIREMENT

AU Docket No. 20-34
WC Docket No. 10-90
WC Docket No. 19-126

By this Public Notice, the Wireline Competition Bureau (Bureau) provides guidance to Rural Digital Opportunity Fund (RDOF) support recipients regarding the obligation of all recipients to meet the upcoming third-year or fourth-year service milestones. For those RDOF carriers authorized to receive RDOF funding in 2021, the fourth-year service milestone requires building out to at least 60% of that support recipient's RDOF locations.¹ For those RDOF carriers authorized to receive RDOF funding in 2022 and 2023,² the third-year service milestone requires building out to at least 40% of that support recipient's RDOF locations.³

The Bureau reminds all RDOF carriers that for reporting in the High Cost Universal Broadband (HUBB) portal, these carriers have transitioned from reporting the geographic coordinates and addresses associated with the locations where they offer service meeting their high-cost support requirements⁴ to reporting the Broadband Serviceable Location Fabric (Fabric) Location IDs associated with these locations based on a list of eligible Location IDs for each carrier.⁵ In the *High-Cost Fabric Order*, the

¹ 47 CFR § 54.802(c)(1) ("All recipients of Rural Digital Opportunity Fund support must complete deployment to 40 percent of the required number of locations as determined by the Connect America Cost Model by the end of the third year, to 60 percent by the end of the fourth year. . . .").

² *Rural Digital Opportunity Fund Support Authorized for 1,764 Winning Bids; Etheric Communications Petition for Waiver Denied*, AU Docket No. 20-34 et al., Public Notice, 38 FCC Rcd 101, 101-2 (WCB/OEA 2023); in the *13th Ready to Authorize Public Notice*, the Bureau found good cause to grant a limited waiver of section 54.802(c)(1) of the Commission's rules to require the applicants with winning bids announced as ready to authorize in that Public Notice to meet the same service milestones as all Auction 904 (RDOF) support recipients that were authorized in 2022. *Rural Digital Opportunity Fund Support for 1,764 Winning Bids Ready to Be Authorized; Bid Defaults Announced*, AU Docket No. 20-34 et al., Public Notice, 37 FCC Rcd 14699, 14699-700 (WCB/OEA 2022).

³ 47 CFR § 54.802(c)(1).

⁴ To measure progress and monitor compliance with service milestones, the Commission requires recipients of high-cost program support to report deployment data in the HUBB and certify that data on an annual basis. 47 CFR § 54.316. The deadline by which to report deployment in the previous year is March 1st. *Id.* § 54.316(c).

⁵ The Broadband DATA Act defines the Fabric as the "common dataset of all locations in the United States where fixed broadband internet access service can be installed, as determined by the Commission." 47 U.S.C. § 642(b)(1)(A)(i). A broadband serviceable location (BSL) is a business or residential location in the United States at which fixed broadband Internet access service is, or can be, installed. Each BSL in the Fabric is assigned a

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Bureau explained that RDOF carriers will transition to reporting Location IDs in their HUBB filings.⁶ Guidance available at <https://www.fcc.gov/wireline-competition/HUBB-Transition> explains that these carriers will be required to submit and certify Location IDs by March 2, 2026 for all locations where they offered service pursuant to their high-cost obligations as of December 31, 2025.⁷

The Bureau also reminds RDOF recipients to notify the Bureau in accordance with sections 54.806(c)(2) or 54.320(d) if they believe they cannot meet the third-year or fourth-year service milestone, as applicable.⁸ Any support recipient that will not meet its 40% buildout requirement by the end of its third year of support or its 60% buildout requirement by the end of its fourth year of support must notify the Bureau within 10 business days of the third-year service milestone deadline—i.e., by Thursday, January 15, 2026—and provide information explaining this expected deficiency.⁹

We direct any RDOF support recipient that is obligated to notify the Bureau under section 54.806(c)(2) or 54.320(d) to do so by filing a notification through the Commission's Electronic Comment Filing System (ECFS) in the RDOF docket, WC Docket 19-126. An RDOF support recipient that does not meet its third-year or fourth-year service milestone shall be subject to quarterly reporting and have its support withheld if warranted in accordance with the Commission's rules.¹⁰

Unique to the RDOF program, if a 2022 or 2023-authorized support recipient has not made a notification that it cannot meet its 40% service milestone by March 1, 2026 *and* has deployed to fewer than 20 percent of the required number of locations by the end of 2025, the recipient will immediately be in default and subject to support recovery.¹¹ The Tier 4 status six-month grace period as set forth in section 54.320(d)(iv) will not be applicable.¹²

Finally, RDOF support recipients that have defaulted early on portions of their RDOF authorized areas but are still receiving RDOF support elsewhere in the same state must continue to comply with the notification requirement in section 54.806(c)(2) or 54.320(d) referenced in this public notice. If a carrier has defaulted on all authorized winning bids in a state and thus is no longer receiving RDOF support, it does not need to make any further milestone notifications for that state.

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unique identifier (Location ID), which reflects a single point defined by a set of geographic coordinates that fall within the footprint of a structure, as well as other attributes of the structure. "Location" refers to the number of units associated with a BSL in the Fabric.

⁶ *Connect America Fund et al.*, WC Docket No. 10-90 et al., Order, 40 FCC Rcd. 281, 292, para. 26 (WCB 2025) (*High-Cost Fabric Order*).

⁷ *Wireline Competition Bureau Provides Guidance to Rural Digital Opportunity Fund, et al., Carriers on the Transition to Reporting Fabric Location IDs In the High Cost Universal Broadband Portal*; AU Docket No. 20-34 et al., Public Notice, 40 FCC Rcd 2881, 2881 (WCB 2025).

⁸ See 47 CFR § 54.806(c)(2); 47 CFR § 54.320(d) (as applicable to RDOF per 47 CFR § 54.806(c)).

⁹ *Id.*

¹⁰ See 47 CFR §§ 54.320(d)(1), 54.320(c), 54.806(b),(c).

¹¹ With March 1, 2026 falling on a non-business day, the deadline is March 2, 2026.

¹² See 47 CFR § 54.320(d)(iv); *Rural Digital Opportunity Fund et al.*, WC Docket No. 19-126 et al., Report and Order, 35 FCC Rcd 686, 716, para. 64 (2020) (*RDOF Order*) (noting "... it is unlikely that a recipient that substantially misses its third-year milestone would be able to come into compliance in the following year. We therefore direct any support recipient that believes it cannot meet its year three milestone to notify the Bureau and provide information explaining this expected deficiency. If a support recipient has not made such notification by March 1 following the third-year service milestone and has deployed by the end of the third-year milestone to fewer than 20% of its required locations in that state, we will find the recipient to be in default, rather than withholding support and providing an additional six months to come into compliance.").