

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Alaska Connect Fund) WC Docket No. 23-328

ORDER

Adopted: June 25, 2026

Released: June 25, 2026

By the Chief, Wireless Telecommunications Bureau

I. INTRODUCTION

1. In this Order, the Wireless Telecommunications Bureau (Bureau) adopts the Performance Plan Template that mobile providers must use to submit their Alaska Connect Fund (ACF) performance plans for Bureau review and approval.¹ We incorporate, in part, three of the four requested changes to the proposed template, as specified below, and decline to incorporate a requested change because it is inconsistent with the *Alaska Connect Fund Order*.² We also clarify that providers may voluntarily claim additional hex-9s in the comparable areas columns of the Performance Plan Template.

II. BACKGROUND

2. As part of its ongoing effort to recognize and address the distinct challenges—including terrain, climate, and lack of infrastructure—inherent in providing mobile voice and broadband service in rural and remote areas of Alaska, the Commission adopted the *Alaska Connect Fund Order*, which established a new Alaska-specific high-cost universal service support program.³ ACF support will begin on January 1, 2027, for eligible mobile-provider participants, immediately upon completion of the Alaska Plan, its predecessor, on December 31, 2026.⁴

3. The Commission adopted requirements for the providers' performance plans in the *Alaska Connect Fund Order*,⁵ and subsequently clarified those performance plan requirements in the *ACF*

¹ See 47 CFR § 54.318(f)(4).

² *Connect America Fund; Alaska Connect Fund et al.*, WC Docket Nos. 10-90, 23-328, 16-271, 14-58, and 09-197; WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 39 FCC Rcd 12099 (2024) (*Alaska Connect Fund Order*); see also Broadband Deployment Accuracy and Technological Availability Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) (codified at 47 U.S.C. §§ 641-646) (Broadband DATA Act).

³ *Alaska Connect Fund Order*, 39 FCC Rcd at 12100, para. 1; see *Connect America Fund; Alaska Connect Fund et al.*, WC Docket Nos. 10-90, 23-328, 16-271, 14-58, and 09-197; WT Docket No. 10-208, Alaska Connect Fund Order on Reconsideration and Clarification, Alaska Plan Waiver Order, and Order, WC Docket Nos. 10-90, 23-328, 16-271, 14-58, and 09-197; WT Docket No. 10-208, 40 FCC Rcd 7716, 7717, para. 1 (2025) (*ACF Reconsideration Order*).

⁴ 47 CFR § 54.318(b); *Alaska Connect Fund Order*, 39 FCC Rcd at 12131, 12132, 12133, paras. 68, 70, 71, 73, 74; see also *Connect America Fund; Universal Service Reform—Mobility Fund; Connect America Fund—Alaska Plan*, WC Docket Nos. 10-90 and 16-271, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139 (2016) (*Alaska Plan Order*). Mobile providers opt in to the ACF by submitting their performance plans to the Bureau by September 1, 2026. 47 CFR § 54.318(b).

⁵ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 142; accord 47 CFR § 54.318(f).

Reconsideration Order.⁶ The Commission directed the Bureau to “release a Public Notice providing guidance on what to include in the performance plans and their format.”⁷ The Commission also delegated authority to the Bureau to “adopt requirements and develop data specifications, after appropriate public process, concerning the format and method of uploading Alaska Connect Fund Performance Plans.”⁸

4. The Bureau sought comment on a proposed Performance Plan Template designed to reflect providers’ ACF commitment requirements.⁹ Under the requirements of the *Alaska Connect Fund Order*, participating mobile providers performance plans must “(1) include the name of the census tract that the provider commits to serve; (2) include the minimum technology level and speed in an outdoor stationary environment that the provider commits to provide; (3) specify the number of hex-9s committed to be covered within each census tract at the committed-to technology and speed levels, which shall be no less than the provider’s coverage in the Alaska Plan, minus any ineligible areas; and (4) specify how many additional hex-9s committed to within each census tract at the committed-to technology and speed levels are comparable hex-9s.”¹⁰ Each row of the proposed performance plan template therefore represented a minimum technology and expected speed for a minimum number of hex-9s that the provider commits to for a single-support or duplicate-support area of a particular census tract.¹¹ The proposed Performance Plan Template has a columnar structure, with each column intended to capture specific, necessary information for the Bureau’s review, analysis, and approval.¹²

⁶ *ACF Reconsideration Order*, 40 FCC Rcd at 7721-31, paras. 11-29.

⁷ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 142; *see also Wireless Telecommunications Bureau Seeks Comment on the Initial Eligible-Areas Map and Performance Plan Template for the Alaska Connect Fund*, WC Docket No. 23-328, Public Notice, 40 FCC Rcd 7816, 7819-20 (WTB 2025) (*EA Map and PP Template Notice*).

⁸ 47 CFR § 54.318(f)(4); *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 143.

⁹ *EA Map and PP Template Notice*, 40 FCC Rcd at 7819-20. The comment deadline was originally November 14, 2025, *id.* at 7816, but the comment cycle ultimately ended on January 7, 2026, due to extensions. *Wireless Telecommunications Bureau Extends Comment Deadlines for Alaska Connect Fund Eligible-Areas Map and Performance Plan Template*, WC Docket No. 23-328, Public Notice, 40 FCC Rcd 8830, 8831 (WTB 2025); *Wireless Telecommunications Bureau Extends Reply Comment Deadline for Alaska Connect Fund Eligible-Areas Map and Performance Plan Template and Provides Additional Information Regarding Updated Eligible Areas Map*, WC Docket No. 23-328, Public Notice, DA 25-1061 (WTB Dec. 16, 2025) (extending the reply comment deadline to January 7, 2026).

¹⁰ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 142 (footnotes omitted); *accord* 47 CFR § 54.318(f)(1). Hex-9s come from the H3 standardized, open-source geospatial indexing system developed by Uber Technologies, Inc. for indexing geographies into hexagonal grids. *See* 47 CFR § 1.7001(a)(20); *Establishing the Digital Opportunity Data Collection*, WC Docket No. 19-195, Order, 37 FCC Rcd 3007, 3086, Appx. A (2022) (*Mobile Technical Requirements Order*). The size of the hexagons is determined by the resolution, 0 being the largest and 15 being the smallest. *See* 47 CFR § 1.7001(a)(20). At the hex-9 (resolution 9) level, a hexagon is small: approximately 0.1 square kilometers on average. *Mobile Technical Requirements Order*, 37 FCC Rcd at 3087. This system is used in the Broadband Data Collection (BDC) and, therefore, is used in the Alaska Connect Fund. *Alaska Connect Fund Order*, 39 FCC Rcd at 12138-39, para. 86-87. The Commission found “that using hex-9 areas is the best way to identify areas that mobile-provider participants in the Alaska Connect Fund had previously covered under their Alaska Plan commitments, while giving providers the flexibility to provide mobile coverage where people live, work, and travel under the Alaska Connect Fund. The hex-9 approach also best addresses concerns raised in the record about how to develop performance plans for Alaska Connect Fund support.” *Alaska Connect Fund Order*, 39 FCC Rcd at 12161, para. 146 (footnote omitted).

¹¹ *EA Map and PP Template Notice*, 40 FCC Rcd at 7819.

¹² *See EA Map and PP Template Notice*, 40 FCC Rcd at 7820-23 (“Column-by-Column Explanation of the Performance Plan Template for the ‘ACF Commitments’ Tab.”); *infra* Appx. A.

5. The Bureau sought comment on the “workability” and the submission process (including supporting documentation) of the proposed Performance Plan Template. The Bureau also asked whether any particular element, the Template, or the submission process could be improved, so as to ensure that providers’ ACF commitments “can be captured as clearly as possible, consistent with the *Alaska Connect Fund Order*’s requirements.”¹³ Two commenters—Alaska Remote Carrier Coalition (ARCC) (which represents five of the eight ACF-eligible mobile providers)¹⁴ and GCI¹⁵—suggested changes to the proposed template.

III. DISCUSSION

6. By this Order, we adopt the proposed Performance Plan Template¹⁶ and instructions,¹⁷ with certain modifications, for use in the ACF. The Performance Plan Template is available to download from the Alaska Connect Fund webpage,¹⁸ and an example of the adopted Performance Plan Template and associated instructions are in the Appendices, *infra*. We address the issues raised by commenters regarding the template in turn. First, we alter the instructions to allow the submission of oversubscription data on a voluntary basis, but decline to modify Column E of the proposed Performance Plan Template. Second, we find special collections, in place of Broadband Data Collection (BDC) data for ACF commitments, are impermissible, and accordingly decline to alter the template. Third, we add a column where a provider indicates whether any of the hex-9s are within 1.5 miles of the provider’s cell site. Fourth, we will no longer require a comparable areas explanation where a provider meets the safe harbor. We also clarify how mobile providers may add voluntary hex-9s to their support areas.

7. *Oversubscription*. “Oversubscription” refers to a provider selling more capacity than it can actually provide, based on the premise that aggregate consumer demand will not exceed the available capacity at the same time.¹⁹ ARCC requests that oversubscription be added to the Performance Plan

¹³ *EA Map and PP Template Notice*, 40 FCC Rcd at 7820.

¹⁴ Alaska Remote Carrier Coalition (ARCC) Comments (representing Arctic Slope Telephone Association Cooperative (ASTAC), Bristol Bay Cellular Partnership, Copper Valley Wireless, Cordova Wireless, OTZ Wireless); ARCC Reply. Three ARCC members filed separate comments, but those comments were focused on changes to the EA Map, not the Performance Plan Template. *See* Copper Valley Telecom Comments; OTZ Telephone Cooperative Comments; Cordova Wireless Communications Comments.

¹⁵ GCI Communication Corp. Comments (GCI Comments); GCI Communication Corp. Reply (GCI Reply). GCI is an ACF-eligible mobile carrier with coverage reported statewide. GCI is currently the largest Alaska Plan mobile provider, receiving over 70% of all Alaska Plan mobile support at more than \$70 million per year and responsible for over 70% of committed-to coverage.

¹⁶ *See infra* Appx. B.

¹⁷ *See infra* Appx. A.

¹⁸ FCC, Alaska Connect Fund, Mobile Performance Plan Template, <https://www.fcc.gov/wireline-competition/alaska-connect-fund#mobile-performance-plan-template>. The mobile providers will fill in the template and submit it and any supporting documentation via a portal that will be available from the Universal Service Administrative Company (USAC). The Bureau will be providing additional information to assist filers regarding access to the portal. The USAC Portal will allow for validations to be applied to the data submitted in the Performance Plan Template that will be helpful to both the providers and the Commission, including validating column entries (e.g., not allowing for a commitment to exceed the number of hex-9s in a census tract) and enforcing proper data types. After the performance plans have been validated by the USAC Portal and accepted by the Bureau, the Bureau will make the accepted performance plans publicly accessible. After September 1, 2026, the Bureau will release a public notice indicating which providers have successfully opted in to the Alaska Connect Fund. 47 CFR § 54.318(b).

¹⁹ For example, if the provider has 1 Mbps of middle mile, and it sells 1 Mbps of service to 10 end users, then it is using a 10:1 oversubscription ratio. *See* ARCC, WC Docket No. 23-328 et al., Comments of Alaska Remote Carrier Coalition Regarding Notice of Proposed Rulemaking at 17 n.43, 34 (rec. Jan. 15, 2024) (“The oversubscription ratio

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Template.²⁰ ARCC reasons that “[i]f the service is too greatly oversubscribed, the service is 5G in name only” and “carriers should be provided with flexibility to select the appropriate level of oversubscription for each market.”²¹ ARCC recommends that Column E (Interim Commitments TechSpeed), which specifies the technology and speed to which each provider commits, “should be modified to indicate what level of oversubscription is being used to achieve service delivery.”²² ARCC believes that provision of oversubscription information should be voluntary.²³

8. We grant in part ARCC’s request by specifying in Column H of the instructions that providers may voluntarily submit oversubscription information. We find no need, however, to require providers to submit oversubscription data or to implement ARCC’s proposal to modify Column E, because the BDC,²⁴ on which the ACF is based, has mechanisms to address these concerns.²⁵ Column E collects speed and technology commitments consistent with BDC speed and technology requirements, such as 5G-NR at 7/1 Mbps.²⁶ Unlike previous coverage data collections by the Commission,²⁷ the BDC rules are robust and specific with respect to how the provider must report its coverage.²⁸ As a check to ensure that the mobile broadband provider’s coverage is accurate, the BDC utilizes speed-test data to create mobile challenges to the provider’s coverage and can engage the mobile provider further through the verification and audit processes.²⁹ These BDC mechanisms can address unrealistic oversubscription by a provider, and the ACF relies on the BDC.³⁰

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is the ratio of a network’s maximum potential demand to its contracted rates. In some cases, the network can only handle a portion of the traffic if all the application servers are running at full throttle at the same time.”), <https://www.fcc.gov/ecfs/document/101150701606344/1>.

²⁰ ARCC Comments at 3.

²¹ ARCC Comments at 3.

²² ARCC Comments at 9.

²³ ARCC Comments at 9.

²⁴ The BDC is the Commission’s biannual collection of data from broadband providers relating to the availability and quality of their services, among other things, and is published by the Commission on the National Broadband Map. *See generally Establishing the Digital Opportunity Data Collection; Modernizing the FCC Form 477 Data Program*, Second Report and Order and Third Further Notice of Proposed Rulemaking, 35 FCC Rcd 7460 (2020); *see also* Broadband Deployment Accuracy and Technological Availability Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) (codified at 47 U.S.C. §§ 641-646) (Broadband DATA Act); *Establishing the Digital Opportunity Data Collection; Modernizing the FCC Form 477 Data Program*, Fourth Report and Order, Declaratory Ruling, and Fourth Further Notice of Proposed Rulemaking, 39 FCC Rcd 7539, 7549, para. 27.

²⁵ *See* 47 CFR § 1.7006; *see also* GCI, Reply Comment of GCI Communication Corp. Regarding Its Petition for Clarification and Reconsideration of the Alaska Connect Fund Report and Order, WC Docket No. 23-328 et al., at 7 n.23 (rec. Apr. 29, 2025) (noting that oversubscription information is unnecessary as excessive oversubscription is captured with failed speed tests); Letter from Jeffrey H. Smith, VP of Public Policy and Advocacy, ARCC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 23-328, et al., at 4 (filed Apr. 15, 2024) (noting that failed speed tests are likely due to oversubscription).

²⁶ *Compare infra* Appx. A, col. E, with 47 CFR § 1.7004(c)(3)(i).

²⁷ *See Alaska Connect Fund Order*, 39 FCC Rcd at 12157-59, paras. 137-41.

²⁸ *See* 47 CFR § 1.7004(c)(3); FCC, BDC, Data Specifications for Biannual Submission of Subscription, Availability, and Supporting Data (May 22, 2026), <https://us-fcc.app.box.com/v/bdc-availability-spec> (FCC BDC Specifications).

²⁹ *See* 47 CFR § 1.7006(a), (c), (e), (f).

³⁰ 47 CFR §§ 54.308(e)(2), 54.318(a)(2), (c)(1)(ii)-(iii), (d)(1)(ii), (f)(8), (g), (h)(5), (k)(2); *Alaska Connect Fund Order*, 39 FCC Rcd at 12130, 12157, 12158-60, paras. 67 & n.176, 136, 138-42 & n.358.

9. Because oversubscription information may be useful, however, we incorporate changes to Column H of the Template instructions to allow providers to submit such information voluntarily. To the extent that a provider chooses to provide its oversubscription ratio for a commitment row, it is free to do so as “supporting documentation,” and the provider does not need to select “other” in the interim/final commitment notes to submit this documentation.

10. *Commitments That Do Not Conform with BDC Reporting Categories.* In Column E (Interim Commitments TechSpeed) and Column L (Final Commitments TechSpeed) of the proposed Performance Plan Template, providers can select one of five technology and speed categories when making commitments.³¹ These five combinations of technology and speed are the five BDC technology and speed categories: Voice, 3G at 200/50 kbps, 4G LTE at 5/1 Mbps, 5G-NR at 7/1 Mbps, and 5G-NR at 35/3 Mbps.³²

11. GCI requests that a revised Performance Plan Template “include separate columns for the speed and specific radio technology that will be used to serve a hex—distinct from the BDC map category in which the hex will fall.”³³ GCI argues that using the combined BDC technology and speed categories³⁴ is problematic because “even if a hex is served by a 5G-NR or 4G LTE radio, under BDC reporting instructions, it may still be included in a category labeled with a lower level of legacy technology.”³⁵ GCI points to section 54.318(f)(6), which notes that “mobile providers may . . . demonstrate to WTB other reasons why it is not technically and financially feasible to meet” the expectations within that subsection and “may propose alternatives.”³⁶ GCI argues that “[t]o be consistent with the [*Alaska Connect Fund*] Order and *ACF Reconsideration Order*, the performance plan template needs to provide a way to propose and record commitments that fall below [BDC] reporting thresholds.”³⁷ GCI additionally contends “that the Broadband DATA Act does not preclude supplemental data submissions where necessary.”³⁸ GCI argues that commitments that do not conform with BDC reporting categories “are expressly permitted under Paragraph 157 of the [*Alaska Connect Fund*] Order,”³⁹ which allows for the Bureau to negotiate individualized performance plans where a provider cannot meet the minimum deployment goals and allows for the filing of supplementary information to aid in that process.⁴⁰

³¹ See, e.g., *EA Map and PP Template Notice*, 40 FCC Rcd at 7820-21, 7825, Appx.

³² 47 CFR § 1.7004(c)(3). For each of the mobile broadband technologies (i.e., 3G, 4G LTE, and 5G-NR), the BDC rules measure the minimum expected user download speed and user upload speed at the cell edge. *Id.* § 1.7004(c)(3)(i).

³³ GCI Comments at 14; see also Letter from John T. Nakahata, Annick M. Banoun, Daeyeong Kim, Counsel, GCI, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 23-328, at 3 (filed Jan. 29, 2026) (GCI Jan. 29, 2026 *Ex Parte* Letter).

³⁴ 47 CFR § 1.7004(c)(3)(i) (defining BDC technology and speed categories: 3G at 200/50 kbps; 4G LTE at 5/1 Mbps; 5G-NR at 7/1 Mbps; and 5G-NR at 35/3 Mbps); see also *id.* § 1.7004(c)(3)(ii) (voice).

³⁵ GCI Comments at 15.

³⁶ Letter from Annick M. Banoun, Counsel, GCI, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 23-328, at 2 (filed Apr. 23, 2026) (GCI Apr. 23, 2026 *Ex Parte* Letter).

³⁷ GCI Apr. 23, 2026 *Ex Parte* Letter at 1; accord Letter from John T. Nakahata, Annick M. Banoun, Counsel, GCI, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 23-328, at 1 (filed Apr. 30, 2026) (GCI Apr. 30, 2026 *Ex Parte* Letter); see GCI Jan. 29, 2026 *Ex Parte* Letter at 3.

³⁸ GCI Apr. 23, 2026 *Ex Parte* Letter at 3.

³⁹ GCI Jan. 29, 2026 *Ex Parte* Letter at 3.

⁴⁰ *Alaska Connect Fund Order*, 39 FCC Rcd at 12167, para. 157.

12. We decline to incorporate GCI’s requested change to separate the speed and technology categories in the Performance Plan Template, which would allow providers to submit commitments that differ from BDC standards because such an approach would be inconsistent with the Broadband DATA Act and with the Commission’s clear direction in the *Alaska Connect Fund Order* and the ACF rules regarding the data standards to be used for performance plans.⁴¹ As an initial matter, the Broadband DATA Act requires the Commission to use the National Broadband Map “when making any new award of funding with respect to the deployment of broadband internet access service intended for use by residential and mobile customers.”⁴² The Commission concluded that Alaska Connect Fund mobile support constitutes a “new award of funding” under the Broadband DATA Act because that support “begins with new obligations that lead to an expansion or upgrade of mobile broadband coverage.”⁴³ Given this conclusion, the Commission found that it must “rely on the National Broadband Map data and the associated BDC data standards in awarding funding for mobile support under the Alaska Connect Fund.”⁴⁴ Accordingly, the Commission “require[d] initial Alaska Connect Fund performance plans to rely on the BDC coverage data and BDC data standards on which the National Broadband map is based and on mobile providers’ availability data in Alaska as of December 31, 2024.”⁴⁵ This requirement was incorporated into the Commission’s ACF rules regarding mobile provider’s performance plans.⁴⁶ Thus, because the Commission collects data through the BDC for five technology and speed categories (i.e., 5G-NR at 35/3 Mbps, 5G-NR at 7/1 Mbps, 4G LTE at 5/1 Mbps, 3G at 200/50 kbps, and Voice),⁴⁷ the Commission must use those exact technology and speed categories for Alaska Connect Fund mobile support, unless and until the Commission conducts a rulemaking proceeding in the BDC docket to amend those categories.

13. Indeed, the Commission considered whether to use a supplementary collection for BDC, raised by GCI, and rejected doing so.⁴⁸ In the rulemaking proceeding, GCI “argue[d] that the Commission can use a supplementary collection for BDC, like what was used in the Alaska Plan.”⁴⁹ The

⁴¹ See Broadband DATA Act § 802(c)(2)(B) (codified at 47 U.S.C. § 642(c)(2)(B)); *Alaska Connect Fund Order*, 39 FCC Rcd at 12157, 12158-60, paras. 136, 138-42.

⁴² Broadband DATA Act § 802(c)(2)(B) (codified at 47 U.S.C. § 642(c)(2)(B)).

⁴³ *Alaska Connect Fund Order*, 39 FCC Rcd at 12158, para. 138.

⁴⁴ *Alaska Connect Fund Order*, 39 FCC Rcd at 12158, para. 138; see also *id.* at 12130, para. 67 (“All coverage analysis including all performance plans required by the Alaska Connect Fund . . . will rely on BDC data”); *id.* at 12130, para. 67 n.176 (“Using BDC data allows the Commission to disburse funds under the Alaska Connect Fund using the availability data on the National Broadband Map.”).

⁴⁵ *Alaska Connect Fund Order*, 39 FCC Rcd at 12158, para. 138; accord *id.* (“We require Alaska Connect Fund performance plans for mobile support to be based on BDC data standards.”); *id.* at 12157, para. 136 (“To qualify for mobile support under the Alaska Connect Fund, we require existing Alaska Plan providers to submit new performance plans . . . based on BDC standards and availability data The new performance plans will align with BDC standards”); see also 47 CFR §§ 54.308(e)(2), 54.318(a)(2), (c)(1)(ii)-(iii), (d)(1)(ii), (f)(8), (g), (h)(5), (k)(2) (relying on BDC data for administration of the ACF).

⁴⁶ 47 CFR § 54.318(f)(8) (“Initial Alaska Connect Fund performance plans must rely on Broadband Data Collection availability data and data standards on which the National Broadband Map is based on mobile providers’ availability data in Alaska as of December 31, 2024.”).

⁴⁷ 47 CFR § 1.7004(c)(3). For each of the mobile broadband technologies (i.e., 3G, 4G LTE, and 5G-NR), the BDC rules measure the minimum expected user download speed and user upload speed at the cell edge. *Id.* § 1.7004(c)(3)(i).

⁴⁸ *Alaska Connect Fund Order*, 39 FCC Rcd at 12158, para. 138 n.358.

⁴⁹ *Alaska Connect Fund Order*, 39 FCC Rcd at 12158, para. 138 n.358 (citing Letter from John Nakahata et al., Counsel, GCI, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 23-328, at 2-3 (Sept. 12, 2024)).

Commission rejected this argument, noting that “[s]uch submissions are not used in the National Broadband Map, however, and if introduced to the map, would not allow for a uniform analysis of the United States as a whole.”⁵⁰ GCI did not seek reconsideration on this point.⁵¹

14. It is true, as GCI suggests, that the Commission delegated to the Bureau the authority to collect additional data, as needed, to determine whether providers have met their commitments⁵² or if the provider needs to make a showing as to why it cannot commit to minimum deployment or progress goals.⁵³ The minimum deployment goals are 5G-NR at 35/3 Mbps, 5G-NR at 7/1 Mbps, and 4G LTE at 5/1 Mbps,⁵⁴ depending on the situation, with a strong presumption against 4G LTE at 5/1 Mbps for any milestone.⁵⁵ But the Commission made clear that such information or data would be “additional[.]” or “supplementary” to the use of BDC data, because they are to complement the use of BDC data.⁵⁶ These data collections otherwise would not be “additional” or “supplementary” to the BDC data or standards; they would be “instead of” or “alternative to” the BDC data or standards. Paragraph 157 of the *Alaska Connect Fund Order* delegates authority to the Bureau to negotiate with a provider where it “cannot meet the minimum deployment and progress goals at the Alaska Connect Fund support levels.”⁵⁷ But this paragraph does not contradict the clear direction in the *Alaska Connect Fund Order* that performance plans must be based on BDC data standards. Two of the BDC’s five data standards are below 4G LTE at 5/1 Mbps.⁵⁸ However, additional information is needed in those situations where a lesser commitment is

⁵⁰ *Alaska Connect Fund Order*, 39 FCC Rcd at 12158, para. 138 n.358. The BDC rules require providers to submit availability at predetermined technology and speeds, so that a provider must offer both the required technology and speeds to claim coverage at that level. See 47 CFR § 1.7004(c)(3)(i) (specifying minimum speeds by technology). Special collections with different speeds and technologies than those set forth in the BDC would conflict with the Commission’s clear finding—and ACF rules—that performance plans must rely on BDC data and standards, and could lead to inconsistencies with the BDC data and the National Broadband Map. *Alaska Connect Fund Order*, 39 FCC Rcd at 12130-31, 12157-59, paras. 67, 138-41 & n.352; see also 47 CFR §§ 54.308(e)(2), 54.318(a)(2), (c)(1)(ii)-(iii), (d)(1)(ii), (f)(8), (g), (h)(5), (k)(2).

⁵¹ See generally GCI Communication Corp. Petition for Clarification and Reconsideration of the Alaska Connect Fund Report and Order, WC Docket Nos. 23-328, 16-271, 10-90, 14-58, and 09-197; WT Docket No. 10-208 (filed Jan. 30, 2025), <https://www.fcc.gov/ecfs/document/10130156599467/1>.

⁵² *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 143.

⁵³ *Alaska Connect Fund Order*, 39 FCC Rcd at 12153, 12167-68, paras. 126, 157.

⁵⁴ 47 CFR § 54.318(f)(6).

⁵⁵ *Alaska Connect Fund Order*, 39 FCC Rcd at 12167-68, para. 157.

⁵⁶ *Alaska Connect Fund Order*, 39 FCC Rcd at 12130, para. 67 & n.176 (“Using BDC data allows the Commission to disburse funds under the Alaska Connect Fund using the availability data on the National Broadband Map. *Additionally*, to ensure proper plan administration, we will also . . . delegate authority to WTB to require special submissions, as it deems necessary, throughout the course of the Alaska Connect Fund.” (emphasis added)); *id.* at 12160, para. 143 (delegating authority to the Bureau to “require *additional* information, including during WTB’s review of any proposed performance plans, from individual Alaska Connect Fund mobile-provider recipients that it deems necessary for determining whether or not they have met their commitments” (emphasis added)); *id.* at 12167, para. 157 (noting that “[p]roviders may submit *supplementary* information to aid in th[e] process” of requesting approval of lesser commitments than the minimum deployment and progress goals specified in the *Alaska Connect Fund Order*) (first emphasis added).

⁵⁷ *Alaska Connect Fund Order*, 39 FCC Rcd at 12167, para. 157.

⁵⁸ The Broadband Data Collection requires mobile providers to submit coverage maps for five technology and speed categories: 3G at 200/50 kbps, 4G LTE at 5/1 Mbps, 5G-NR at 7/1 Mbps, 5G-NR at 35/3 Mbps, and mobile voice services “using any technology.” FCC BDC Specifications at 49; see also 47 CFR § 1.7004(c)(3)(i)-(ii) (requiring submission of coverage maps for 3G at 200/50 kbps and for voice). The radio technologies by generation are

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sought, to understand “the reason [the provider] cannot commit to the minimum deployment or progress goal. . . . [and the provider] may submit supplementary information to aid in this process.”⁵⁹ To the extent that a mobile provider makes a showing that it should be allowed to commit to service less than 4G LTE at 5/1 Mbps,⁶⁰ the Bureau will rely exclusively on the lower BDC data standards in the limited instances when it must evaluate commitments that fall below the 4G LTE at 5/1 Mbps threshold.⁶¹

15. Accordingly, GCI’s request to separate the technology and speed columns in the Template and allow special collections for different speeds and technologies than those in the BDC is inconsistent with the Broadband DATA Act, the *Alaska Connect Fund Order*, and the ACF rules.⁶² We decline to incorporate that change.

16. *Hex-9s Within 1.5 Miles of the Provider’s Cell Site*. Pursuant to Commission rules, each mobile provider “must commit to cover any eligible hex-9 in its support area.”⁶³ Within those areas, “mobile providers in single-support areas are expected to provide 5G-NR at speeds of 35/3 Mbps only to portions of their anticipated coverage area that are within a 1.5-mile radius around their cell sites and only where the provider has access to fiber- or microwave-based backhaul and competitively priced transport rates.”⁶⁴

17. GCI requests that the Bureau modify the Performance Plan Template so that providers submit the hex-9s that are within a 1.5-mile radius of the cell site, rather than submitting all hexes not within a 1.5-mile radius of a cell site that have access to fiber- or microwave-based backhaul and competitively priced transport rates.⁶⁵ GCI argues that to “minimize paperwork burdens and reflect the *ACF Reconsideration Order*’s modification of presumptive performance plan obligations in 47 C.F.R. § 54.318(f)(6), the template should require providers to identify hexes that are *within* (rather than outside)

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specified in the BDC Specifications document and are mutually exclusive. See FCC BDC Specifications at 13. 3G at 200/50 kbps and voice commitments would be below the 4G LTE at 5/1 Mbps threshold.

⁵⁹ *Alaska Connect Fund Order*, 39 FCC Rcd at 12167, para. 157; see also *id.* paras. 158-59.

⁶⁰ 47 CFR § 54.318(f)(6); *Alaska Connect Fund Order*, 39 FCC Rcd at 12167, para. 157.

⁶¹ See *Alaska Connect Fund Order*, 39 FCC Rcd at 12130, 12158, paras. 67 (“All coverage analysis including all performance plans required by the Alaska Connect Fund . . . will rely on BDC data.” (emphasis added)), 138 (“We require Alaska Connect Fund performance plans for mobile support to be based on BDC data standards.”), 138 n.358 (rejecting supplementary submissions in place of BDC), 142 n.368 (noting that performance plan commitments are consistent with BDC requirements).

⁶² 47 CFR §§ 54.308(e)(2), 54.318(a)(2), (c)(1)(ii)-(iii), (d)(1)(ii), (f)(8), (g), (h)(5), (k)(2); *Alaska Connect Fund Order*, 39 FCC Rcd at 12102, 12130-31, 12132, 12133, 12138-40, 12142, 12143, 12148-49, 12150, 12152, 12153, 12157, 12158-60, 12160-61, 12170, 12172, paras. 6 & n.5, 67 (“All coverage analysis including all performance plans required by the Alaska Connect Fund . . . will rely on BDC data.”), 67 nn.176, 178, 71, 74, 86-88 & n.230, 95, 97, 109 n.302, 111-12, 117, 124, 126, 136 & n.352, 138 n.358 (rejecting supplementary submissions in place of BDC), 142 n.368, 138-42, 144 & n.373, 163, 170.

⁶³ 47 CFR § 54.318(f)(2).

⁶⁴ 47 CFR § 54.318(f)(6). The Commission “generally expect[s] a provider to extend 5G-NR at 35/3 Mbps to all portions of its service areas within a 1.5-mile radius of its cell sites unless it can otherwise demonstrate that doing so is technically and financially infeasible.” *ACF Reconsideration Order*, 40 FCC Rcd at 7729, para. 27; see also *cf. id.* at 7729, para. 27 n.103 (“Where a mobile provider has fiber or microwave infrastructure that runs to the Dalton Highway, nonremote areas as defined by section 54.307(e)(3)(i), or at the Alaskan panhandle, it will be presumed to have access to competitive transport pricing.”).

⁶⁵ GCI Comments at 15-16 (arguing that the “within 1.5 mile” approach is less burdensome on providers and consistent with the Paperwork Reduction Act).

1.5 miles of a cell site.”⁶⁶ GCI states that “the performance plan template should include a column for providers to identify hexes that are within 1.5 miles of a cell site. To help the Bureau verify these identifications, providers could submit the coordinates of their cell sites upon request.”⁶⁷ GCI also observes that even with this identification, “[p]roviders would still need to justify a performance commitment at a speed lower than 35/3 Mbps for a hex within 1.5 miles of the cell site [and] could do so in the template column for ‘Final Commitment Notes,’ as they would if the hex was more than 50 miles from a fiber or microwave node.”⁶⁸

18. We grant GCI’s request in part and add two new columns to the Performance Plan Template.⁶⁹ We deny GCI’s request to the extent GCI asks us to replace any existing template requirements in doing so⁷⁰ as the Bureau must capture the information otherwise sought regarding hexes outside 1.5 miles of a cell site and will thus retain all proposed template columns. New Column G, addressing interim commitments, queries: “Are any hex-9s in this row within 1.5 miles of a cell site of the provider?” New Column N, addressing final commitments, makes the same inquiry. If the provider, selects “no” for these columns for a commitment of 5G-NR at 7/1 Mbps, the provider does not need to add an additional justification for that commitment in the Interim Commitment Notes (Column H) or Final Commitment Notes (Column O). However, as GCI observes, indicating that a hex-9 is within 1.5 miles of the provider’s cell is not sufficient to determine whether the 35/3 Mbps requirement applies or not,⁷¹ as a provider may indicate that a hex-9 is within 1.5 miles of the provider’s cell, but that cell may not have access to competitively priced transport, for example, which would still warrant a lesser commitment.⁷² As such, the Performance Plan Template retains the columns proposed, with new headers, so that new Column H, addressing interim commitments, will preserve the option for providers to select as a reason in that field: “the hex-9s are not within a 1.5-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced transport rates.”⁷³ The column that now reads “Column O,” addressing final commitments, preserves the same option. The Commission’s rules explicitly state that “[a] mobile provider must commit to cover any eligible hex-9 in its support area,” which includes areas beyond 1.5 miles of a provider’s cell sites.⁷⁴ Granting GCI’s requested change does not affect this requirement to the extent that a provider indicates that hex-9s are within 1.5 miles of the provider’s cell site and indicates that the commitment is below 35/3 Mbps for those hex-9s. Because, GCI has, in multiple filings, indicated that it believes that the addition of these columns—i.e., new Columns G and N—will ease provider filing burdens,⁷⁵ and because it may be helpful to the Commission

⁶⁶ GCI Apr. 23, 2026 *Ex Parte* Letter at 1; *accord* GCI Apr. 30, 2026 *Ex Parte* Letter at 2.

⁶⁷ GCI Apr. 23, 2026 *Ex Parte* Letter at 4 (emphasis omitted).

⁶⁸ GCI Apr. 23, 2026 *Ex Parte* Letter at 4.

⁶⁹ As the 1.5-mile requirement only applies to single-support areas, providers will only be allowed to complete this column of the template for single-support areas. *See* 47 CFR § 54.318(f)(6). This may change if the Bureau takes further action regarding duplicate-support areas. *See id.* § 54.318(f)(5).

⁷⁰ *See* GCI Apr. 23, 2026 *Ex Parte* Letter at 1 (“[T]he template should require providers to identify hexes that are *within* (rather than outside) 1.5 miles of a cell site”).

⁷¹ GCI Apr. 23, 2026 *Ex Parte* Letter at 4 (“Providers would still need to justify a performance commitment at a speed lower than 35/3 Mbps for a hex within 1.5 miles of the cell site.”).

⁷² 47 CFR § 54.318(f)(6).

⁷³ *Compare infra* Appx. A, col. H, with *EA Map and PP Template Notice*, 40 FCC Rcd at 7821 (providing the proposed instruction for Column G for the Performance Plan Template).

⁷⁴ 47 CFR § 54.318(f)(2).

⁷⁵ GCI Comments at 17 (advocating that providers “submit . . . the coordinates of their cell sites and . . . identify those hexes that are within 1.5 miles of a cell site” (emphasis omitted)); GCI Apr. 23, 2026 *Ex Parte* Letter at 4

(continued....)

for future planning for providers to identify those hex-9s that are within 1.5 miles of the provider's cell site but do not yet have a 5G-NR at 35/3 Mbps commitment, we add these columns to the Performance Plan Template.

19. *Comparable Hex-9s.* Under the ACF, “[m]obile providers that received support under the Alaska Plan for coverage of newly ineligible areas and that wish to retain their support level must, for any support attributed to such newly ineligible areas, use their Alaska Connect Fund support to cover a comparable number of otherwise uncovered hex-9s elsewhere.”⁷⁶ The comparable-areas requirements provide that “[w]here a mobile provider claims that fewer uncovered hex-9s should be deemed as comparable to the number of hex-9s deemed ineligible, the provider must provide justification that the smaller number of hex-9s is comparable to the number of hex-9s that the provider was using support to cover.”⁷⁷ These rules delegate to the Bureau, in coordination with OEA, authority to “require additional clarifying information that allows identification and determination of which comparable hex-9s are replacing which group of ineligible hex-9s.”⁷⁸ The comparable-areas requirements contain a “safe-harbor” provision, which states: “Where a mobile provider commits to cover the same number of uncovered hex-9s as the area that was newly deemed ineligible, the coverage shall be deemed comparable.”⁷⁹

20. In GCI's comments, it requests that the Bureau remove the requirement to identify which comparable hexes replace specified ineligible hexes.⁸⁰ GCI argues that “the rules do not require providers to associate a comparable hex with a particular newly ineligible hex That requirement would be satisfied by indicating, within a given census tract, the number of hexes that are being included as comparable hexes to be counted against the aggregate number of newly ineligible hexes that must be replaced to sustain support.”⁸¹

21. We grant GCI's request in part, as it applies to the safe-harbor provision for comparable hexes. Where a provider commits to cover at least the same number of uncovered hex-9s as the number of hex-9s deemed newly ineligible, that will be considered a safe harbor, and a provider will have such coverage deemed “comparable” to the coverage where it no longer has support.⁸² Where a provider meets the “safe harbor” adopted in the *Alaska Connect Fund Order*,⁸³ we will not require the provider to indicate which hex-9s are the comparable replacements for other hex-9s. We add text to the Performance

(Continued from previous page) _____
(arguing for the template to “include a column for providers to identify hexes that are within 1.5 miles of a cell site” (emphasis omitted)); GCI Apr. 30, 2026 *Ex Parte* Letter at 2.

⁷⁶ 47 CFR § 54.318(h).

⁷⁷ 47 CFR § 54.318(h)(3); *see also Alaska Connect Fund Order*, 39 FCC Rcd at 12150, para. 116 (“For instance, a provider may demonstrate that the newly covered, fewer number of hex-9s contain the same value or more than the newly ineligible hex-9s because they cover more [Broadband Serviceable Locations] or area of significance to the local community.”).

⁷⁸ 47 CFR § 54.318(h)(1).

⁷⁹ 47 CFR § 54.318(h)(2).

⁸⁰ GCI Comments at 17.

⁸¹ GCI Comments at 17.

⁸² *See* 47 CFR § 54.318(h)(3); *Alaska Connect Fund Order*, 39 FCC Rcd at 12150, para. 116.

⁸³ 47 CFR § 54.318(h)(2). Comparable areas are not required to be located within the same census tract as the newly ineligible hex-9s they are replacing. *See* 47 CFR § 54.318(h) (providing the comparable areas requirements and not limiting comparable areas to the same census tract as the newly ineligible hex-9s); *Alaska Connect Fund Order*, 39 FCC Rcd at 12149-50, para. 115 (requiring claiming hex-9s “elsewhere” and not limiting the hex-9s to the same census tract as the newly ineligible hex-9s).

Plan Template’s instructions indicating that where a provider has the same number or more comparable hex-9s than newly ineligible areas, it may leave blank the comparable areas explanation (Columns J and Q). We emphasize, however, that we must retain the current Performance Plan Template structure where the “safe harbor” is not met—i.e., where a provider identifies fewer comparable hexes than newly ineligible hexes. We must require a provider to identify which newly ineligible hex-9s are being replaced by the comparable hex-9s in order to satisfy the requirements of the *Alaska Connect Fund Order*.⁸⁴ Without the comparable areas explanation, the Bureau will not be able to determine whether the fewer hex-9s are comparable to the hexes they are replacing.⁸⁵

22. *Voluntarily Claiming Additional Hex-9s as Support Area.* We clarify that a provider does not need at least one newly ineligible hex-9 to claim additional support areas voluntarily. The Initial Eligible Areas Map is based on the mobile providers’ December 31, 2024 BDC coverage area.⁸⁶ However, a provider may consider some hex-9s as part of its support area,⁸⁷ even though the December 31, 2024 BDC data did not show coverage for those hex-9s by the provider. Commitments reflecting the support areas of the Initial Eligible Areas Map, based solely on BDC December 2024 coverage data, are to be reflected in Columns E and L. We add instructions to the Performance Plan Template clarifying that a provider may voluntarily add hex-9s to its single-support area in the comparable areas columns (Columns I and P),⁸⁸ even if the provider is not required to identify comparable hex-9s to replace newly ineligible hex-9s.⁸⁹ This voluntary process is effectively the same as the comparable areas process⁹⁰—and

⁸⁴ *Alaska Connect Fund Order*, 39 FCC Rcd at 12150, para. 116 (“Providers must incorporate their comparable areas into their performance plans under the Alaska Connect Fund, for WTB approval. Specifically, each mobile provider must remove the ineligible hex-9s from its commitment, and in a separate category in the performance plan, specify how many comparable hex-9s it commits to cover, by census tract . . .”).

⁸⁵ *Alaska Connect Fund Order*, 39 FCC Rcd at 12150, para. 116 (“[A] provider may demonstrate that the newly covered, fewer number of hex-9s contain the same value or more than the newly ineligible hex-9s because they cover more [Broadband Serviceable Locations] or area of significance to the local community. We delegate authority to WTB, in coordination with OEA, to make the determination of whether a provider is covering a ‘comparable number of hex-9s.’”); *see also cf. ACF Reconsideration Order*, 40 FCC Rcd at 7728, para. 26 (“Although the presence of BSLs is a relevant consideration when evaluating where mobile coverage needs to improve,⁹⁴ it is not the only relevant consideration.”).

⁸⁶ *See Alaska Connect Fund Order*, 39 FCC Rcd at 12148, para. 111; *see also* 47 CFR § 54.318(f)(8). Providers submitted corrections but could not expand their service area beyond December 2024 BDC coverage data during construction of the Initial Eligible Areas Map.

⁸⁷ 47 CFR § 54.318(h)(5) (“Where an Alaska Connect Fund mobile support recipient covers a new, uncovered hex-9, . . .): *cf.* 47 CFR § 54.318(e) (“A mobile provider . . . is prohibited from using Alaska Connect Fund support to provide service in areas other than its own single-support or duplicate-support areas or other eligible areas . . .”).

⁸⁸ Commitments in columns I and P are support areas that are not reflected in the Initial Eligible Areas Map, v.1.3, and require submission of the EA Map Update Template with the submission of the Performance Plan Template so that the EA Map can be updated with the provider’s support area it has committed to serve. Columns I and P can only be used to request that “other eligible” areas be converted to the provider’s single-support area. 47 CFR § 54.318(h)(5). Where multiple providers claim the same “other eligible” hex-9 for their support areas, “it will be considered a single-support area attributed to the mobile provider that showed coverage to that hex-9 first, . . . or, in case more than one mobile provider provided coverage for the same area in the same data set . . . , whichever provider has its updated performance plan accepted first.” 47 CFR § 54.318(h)(5).

⁸⁹ 47 CFR § 54.318(h). No additional funding will be given for voluntarily adding hex-9s to a provider’s ACF support area. Additional hex-9s that a provider claims voluntarily in its performance plan will become part of the provider’s single-support area if accepted by the Bureau. Voluntarily claimed hex-9s cannot be claimed as comparable hex-9s.

⁹⁰ 47 CFR § 54.318(h).

both types of the single-support areas claims are to be reflected in Columns I and P—with the distinction that here, a provider does not need to have at least one newly ineligible hex-9 to replace in order to add hex-9s.⁹¹ Where a provider makes a voluntary claim of additional hex-9s, the provider must note “voluntary” in columns J and Q. For any commitments reflected in Columns I and P, which will expand the provider’s single-support areas, the provider must also fill out an EA Map Update Template⁹² listing each such hex-9 that is to be considered a part of the provider’s single-support area. This process will ensure that the updated versions of the EA Map reflect these hex-9s as part of the provider’s support area.⁹³ Providers may not use Alaska Connect Fund support in another provider’s support area.⁹⁴

IV. ORDERING CLAUSES

23. Accordingly, IT IS ORDERED, pursuant to the authority contained in sections 1-5, 254, 301, and 332 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151-155, 254, 301, 332, and sections 0.131, 0.331, and 54.318(f)(4) of the Commission’s rules, 47 CFR §§ 0.131, 0.331, and 54.318(f)(4) and the delegated authority contained in the *Alaska Connect Fund Order*, 39 FCC Rcd 12099, 12103, 12160, paras. 6, 143 (2024), this Order IS ADOPTED.

24. This Order IS EFFECTIVE upon release. 47 CFR § 1.102(b)(1).

FEDERAL COMMUNICATIONS COMMISSION

Joel Taubenblatt
Chief
Wireless Telecommunications Bureau

⁹¹ 47 CFR § 54.318(h) (describing comparable areas as an option for a mobile provider that wishes to retain the support it was receiving in newly ineligible areas). For the comparable areas process, for example, a provider can, in a similar process, claim more hex-9s than required to meet the safe harbor. *Cf.* 47 CFR § 54.318(h)(2) (providing a safe harbor where a mobile provider commits to cover the same number of uncovered hex-9s as the area that was newly deemed ineligible). The safe harbor provision for comparable areas does not prevent a provider from claiming more hex-9s than the newly ineligible hex-9s it is replacing. Where a provider claims more hex-9s than required to meet the safe harbor, we will not treat the additional hex-9s as voluntary commitments. Rather, they would be attributed solely to replacing newly ineligible hex-9s at the time the provider made the comparable hex-9s claim. *Cf.* 47 CFR § 54.318(h) (making a safe harbor the same number of comparable hex-9s but not preventing providers from claiming more than the safe harbor number); *Alaska Connect Fund Order*, 39 FCC Rcd at 12149-51, paras. 113-21.

⁹² The EA Map Update Template will be available for download on the Alaska Connect Fund webpage where the EA Map is available. It will be similar for the EA Map Corrections Template, but the EA Map Update Template will be solely used for updates to providers’ single-support areas from hex-9 changes reflected in Columns I and P.

⁹³ Because hex-9s committed to in the comparable-areas columns of the Performance Plan Template (i.e., Columns I, J, P, and Q) may be based on prospective coverage analysis by the provider, we plan to allow more flexibility in the EA Map for modest shifts in hex-9s that are added to the provider’s single-support areas via the comparable-areas columns. *Cf.* GCI Jan. 29, 2026 *Ex Parte* Letter at 2 (“[D]ue to the small size of hex-9s, it is likely that a designated hex at the margin may not meet the performance standard while an adjacent non-designated hex may meet that standard. We asked whether providers may substitute hexes when assessing compliance with performance commitments.”).

⁹⁴ *See* 47 CFR § 54.318(e).

Appendix A: Performance Plan Template Instructions

Providers will be required to submit these performance plans into the **USAC ACF Portal**, along with any supporting documentation, no later than September 1, 2026.⁹⁵ A provider must commit to cover any eligible hex-9 in its support area.⁹⁶ Providers should email ACF@fcc.gov stating that they have submitted their performance plans to ensure that they are recorded as having a timely opt in for the Alaska Connect Fund.⁹⁷

Column-by-Column Explanation of the Performance Plan Excel Template for the “ACF Commitments” Tab

- **Column A:** “ACF Mobile Provider.”⁹⁸ From the second row, the provider is to select its company name from the drop-down list. The provider should ensure that it selects its company name for each row completed in the plan.
- **Column B:** “Support Area Type.”⁹⁹ The provider is to select the type of support area (single vs. duplicate support area) for which it is making a commitment.
- **Column C:** “The Census Tract FIPS Code.”¹⁰⁰ The provider selects one of the 167 census tracts in Alaska, identified by its FIPS code. Providers may find the “AK Tracts Census 2020” Tab helpful for reference.
- **Column D:** “Census Populated Places or Alaska Native Village Statistical Areas Affected.”¹⁰¹ Providers should list the name of the most populated census designated place within the census tract and the name of any Census Populated Places within the census tract that are to experience at least some coverage under the commitment. Providers may find the “Populated Places” Tab helpful for reference.
- **Column E:** “Interim Commitments TechSpeed.”¹⁰² The provider selects the mobile technology and speed commitment for the provider’s interim commitments for the associated hex-9s of the census tract specified in Column C. Interim commitments can only be entered consistent with BDC requirements. This means that the following entries are the only possible commitments, based on current BDC categories in an outdoor stationary environment:
 - 5G-NR with minimum expected speeds of 35/3 Mbps (5G-NR at 35/3 Mbps);
 - 5G-NR at 7/1 Mbps;

⁹⁵ 47 CFR § 54.318(b).

⁹⁶ 47 CFR § 54.318(f)(2).

⁹⁷ 47 CFR § 54.318(b).

⁹⁸ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 143.

⁹⁹ 47 CFR § 54.318(f)(5). While technically separate performance plans, the single-support area and duplicate-support area commitments are to be filed in the same template. *See id.*

¹⁰⁰ *See* 47 CFR § 54.318(f)(1)(i); *ACF Order*, 39 FCC Rcd at 12160, para. 142 n.367. FIPS is the Federal Information Processing Standard, and each census tract in the United States has an 11-digit code that identifies it. *See ACF Order*, 39 FCC Rcd at 12160, para. 142 n.367. Providers can find a census tract’s FIPS Code by entering an address on the U.S. Census Bureau’s website. Census, Find Address Geographies (last visited Jun. 25, 2026), <https://geocoding.geo.census.gov/geocoder/geographies/address?form> (allowing a user to enter an address and then displaying under “census tracts” the GeoID FIPS code number for that census tract, which consists of the state code (first 2 digits), the county code (next 3 digits), then the tract code (last 6 digits)).

¹⁰¹ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 142, 143.

¹⁰² 47 CFR § 54.318(f)(1)(ii); *see also id.* § 54.318(f)(6), (7).

- 4G LTE at 5/1 Mbps;
- 3G at 200/50 kbps; and
- Voice.¹⁰³

WTB will have a strong presumption against allowing commitments below 4G LTE at 5/1 Mbps for any area at any milestone.¹⁰⁴ Accordingly, selecting 3G or Voice for any milestone can lead to delays in performance plan approval. Where this is selected, a mobile provider must explicitly provide the reason in Column H and submit additional documentation supporting why it cannot commit to the minimum deployment requirement.¹⁰⁵ Providers may have more than one technology/speed commitment per census tract by creating a new row. Providers may find the “Tech” Tab helpful for reference.

- **Column F:** “Interim Commitments Num-Hex9s.”¹⁰⁶ Providers will specify in this column the number of hex-9s that the provider commits to serve in the census tract, at the speed and technology reflected in Column E.¹⁰⁷ For the first performance plans, for this column, the provider should commit to the same number of its support-area hex-9s, reflected in the Initial Eligible Areas Map, v.1.3.¹⁰⁸ The hex-9 commitments in Column F ultimately must include all eligible hex-9s in the provider’s support area¹⁰⁹ but must NOT include any comparable areas.¹¹⁰ If a provider wishes to commit to serve different hex-9s in the census tract with a different technology and/or speed commitment, it must create a new entry in a different row. In addition, providers are to specify all ACF duplicate-support area commitments in this column, even though the duplicate-support commitments must be met in full by December 31, 2029.¹¹¹
- **Column G:** “Are any hex-9s in this row within 1.5 miles of a cell site of the provider?”¹¹² If the centroid of any hex-9 in this row is within 1.5 miles of the provider’s current or expected cell sites’ radii, providers should select “Yes” for this column. Otherwise, providers should select “No.”

¹⁰³ 47 CFR §§ 1.7004(c)(3), 54.318(f)(8); *Alaska Connect Fund Order*, 39 FCC Rcd at 12158-60, paras. 138-42.

¹⁰⁴ *Alaska Connect Fund Order*, 39 FCC Rcd at 12168, para. 157.

¹⁰⁵ 47 CFR § 54.318(f)(7).

¹⁰⁶ 47 CFR § 54.318(f)(1)(iii).

¹⁰⁷ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 142.

¹⁰⁸ 47 CFR § 54.318(f)(2). The provider’s aggregate number of single-support area hex-9s and duplicate-support area hex-9s respectively, should be the same as the number of those hex-9s attributed to the provider in the Initial EA Map, v.1.3. *Id.* Providers wanting to commit to more hex-9s than what is reflected in the Initial EA Map, v.1.3, should use the Comparable/Voluntary Areas process reflected in Columns I, J, P, and Q. Hex-9s claimed in Columns I, J, P, and Q must also have the EA Update Template submitted simultaneously so that the EA Map can be updated the provider’s claimed support hex-9s.

¹⁰⁹ 47 CFR § 54.318(f)(2).

¹¹⁰ *See* 47 CFR § 54.318(f)(3) (“Providers are to reflect the additional coverage that is required to retain support due to areas being deemed ineligible solely in the comparable hex-9 category of their performance plans, consistent with [section 54.318(h)].”).

¹¹¹ 47 CFR § 54.318(d)(2)(ii).

¹¹² *Cf.* 47 CFR § 54.318(f)(6); *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 143.

- **Column H:** “Interim Commitments Notes.” Providers need to state the reason they are not committing to 5G-NR at 35/3 Mbps in single-support areas.¹¹³ The provider may select one of these three reasons in this field: (1) the hex-9s are not within a 1.5-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced transport rates; (2) the hex-9s are covered by a cell site that relies on satellite backhaul and is more than 50 miles away from a fiber or microwave middle-mile node; or (3) other (supporting documentation required).¹¹⁴ When a provider selects the “other” option, it must submit additional documentation that explicitly states the reason it cannot commit to the minimum deployment goal and provide evidence supporting that reason.¹¹⁵ Any additional documentation must reference the row (Row_ID). When these reasons for a lesser commitment change, the provider is required to submit a new performance plan with improved performance commitments.¹¹⁶ For rows where a provider selects “no” for Column G and has a commitment of 5G-NR at 7/1 Mbps, the provider may leave this column blank.¹¹⁷ Because rows can change depending on how the entries are sorted—the provider must list the row-identifying information from Column T when cross-referencing the row. (See Column T, *infra*.)¹¹⁸ For providers that choose to submit documentation related to the oversubscription ratio used for determining the commitments in the row, “other” does not need to be selected. For Column H, providers may find the “Commitment Exceptions” Tab helpful for reference.
- **Column I:** “Comparable/Voluntary Areas: Additional Hex-9 Interim Commitments.”¹¹⁹ In this column, for its statewide comparable hexes, the provider will specify how many comparable hex-9s it commits to serve in this census tract (by technology and speed).¹²⁰ Providers should ensure that the total number of comparable hexes across all rows is equal or greater to the number of hex-9s deemed newly ineligible if it seeks to avail itself of the safe harbor.¹²¹ Unlike the hex-9s in the Initial Eligible-Areas Map, v.1.3, which required coverage based on December 31, 2024 BDC data,¹²² providers may voluntarily commit to add single-support hex-9s from the “other eligible” areas in the EA Map¹²³ by including those hex-9s to the count in this column.¹²⁴

¹¹³ *ACF Reconsideration Order*, 40 FCC Rcd at 7723, para. 16; *see also* 47 CFR § 54.318(f)(6).

¹¹⁴ *See* 47 CFR § 54.318(f)(6)-(7).

¹¹⁵ *See* 47 CFR § 54.318(f)(6)-(7).

¹¹⁶ 47 CFR § 54.318(f)(6)-(7). When the conditions supporting a lesser commitment change, the mobile provider must submit, for the affected census tracts: (i) a description of the change; (ii) the date on which the change occurred; (iii) the hex-9s that could be served as a result of the changed conditions; and (iv) revised performance commitments factoring in the change. These filings must be made simultaneously with the submission of the FCC Form 481. A mobile provider may seek confidential treatment of information required in this section if the conditions for confidentiality are met. Because the full performance plans will be submitted in the USAC Portal, the provider only needs to submit the portion of the performance plan into the docket via the ECFS affected by the change in order to make clear which commitments are affected. The provider would also need to submit a new performance plan, in full, via the USAC Portal.

¹¹⁷ *See ACF Reconsideration Order*, 40 FCC Rcd at 7723, para. 16; *see also* 47 CFR § 54.318(f)(6).

¹¹⁸ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 143.

¹¹⁹ 47 CFR § 54.318(h), (h)(1).

¹²⁰ 47 CFR § 54.318(f)(1)(iv), (f)(3), (h); *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 142. The comparable hex-9s are reflected in columns I, J, K, P, Q, and S.

¹²¹ 47 CFR § 54.318(h)(2).

¹²² *Alaska Connect Fund Order*, 39 FCC Rcd at 12148, para. 111; 47 CFR § 54.318(f)(8).

¹²³ 47 CFR § 54.318(f)(2), (h)(5).

Providers claiming comparable or voluntary hex-9s must also fill out and submit the EA Update Template¹²⁵ so that the EA Map can update the provider's single-support areas.¹²⁶ No entry can be added to this column for duplicate-support areas, as providers cannot commit to provide comparable service or voluntary expansion in those areas.¹²⁷

- **Column J:** “Interim Commitments Comparable/Voluntary Areas Explanation.” Providers that meet the safe-harbor provision¹²⁸—i.e., on a statewide basis, a mobile provider commits to cover at least the same number of uncovered hex-9s as the number of hex-9s that were deemed newly ineligible that the provider was previously using Alaska Plan support to cover—must not fill out this column.¹²⁹ For voluntarily expanded hex-9s, provider must note which hex-9s are “voluntary,” by entering the word “voluntary” in this column. Providers not meeting the safe-harbor provision must describe in this column how they are satisfying their comparable-area requirements,¹³⁰ so as to leave no ambiguity regarding what is being replaced with comparable hex-9s in this census tract. Providers are to specify (1) which hex-9s are being replaced by providing (a) the number of hex-9s that are newly ineligible and (b) the name of the closest census populated place with the FIPS Code of the census tract of the hex-9s that are being replaced; and (2) the number of additional hex-9s in Column I that are being added to the commitment in this row to meet the comparable-areas condition.¹³¹ However, where a mobile provider claims that fewer uncovered hex-9s should be deemed comparable to the number of hex-9s deemed ineligible, the provider must provide justification in supporting documentation that the smaller number of hex-9s is comparable in value to the number of hex-9s that the provider was previously receiving support to cover.¹³² Any additional documentation must reference the Row_ID shown in Column T.
- **Column K:** “Total Interim Commitments (Column F + I).” This column should automatically calculate the total commitment of the minimum number of hex-9s to be covered by summing the numbers provided in Columns F and I. The duplicate-support area commitments are to be provided in the “interim commitment columns,” even though they are due in full by December

(Continued from previous page) _____

¹²⁴ 47 CFR § 54.318(f)(3). Where two providers attempt to claim the same “other eligible” hex-9, the tiebreaker process will be followed. 47 CFR § 54.318(h)(5).

¹²⁵ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 143.

¹²⁶ 47 CFR § 54.318(h)(4), (h)(5).

¹²⁷ 47 CFR § 54.318(h)(4).

¹²⁸ 47 CFR § 54.318(h)(2).

¹²⁹ 47 CFR § 54.318(h)(2) (providing a safe harbor as comparable where a mobile provider commits to cover the same number of uncovered hex-9s as the area that was newly deemed ineligible).

¹³⁰ *Alaska Connect Fund Order*, 39 FCC Rcd at 12150, para. 116 (“However, if a provider wishes to commit to fewer hex-9s than the number of hex-9s that were deemed ineligible, it must demonstrate why this lower number constitutes ‘comparable’ coverage.”); 47 CFR § 54.318(h)(3).

¹³¹ 47 CFR § 54.318(f)(3); *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 143.

¹³² 47 CFR § 54.318(h)(3); *Alaska Connect Fund Order*, 39 FCC Rcd at 12150, para. 116.

31, 2029 (the duplicate-support rows are to be blank for Column I).¹³³ The single-support area interim commitments are due December 31, 2031.¹³⁴

- Column L: “Final Commitments TechSpeed.” Same instructions as Column E, but reflects the final technology and speed commitments due December 31, 2034.¹³⁵ Duplicate-support areas are not reflected in final commitment columns.¹³⁶
- Column M: “Final Commitments Num_Hex9s.” Same instructions as Column F, but as applied to Final Commitments, reflecting the final technology and speed commitments in Column L.
- Column N: “Are any hex-9s in this row within 1.5 miles of a cell site of the provider?” Same instructions as Column G, but as applied to Final Commitments.
- Column O: “Final Commitments Notes.” Same instructions as Column H, but as applied to Final Commitments.
- Column P: “Comparable/Voluntary Areas: Additional Hex-9 Final Commitments.” Same instructions as Column I, but as applied to Final Commitments.
- Column Q: “Final Commitments Comparable/Voluntary Areas Explanation.” Same instructions as Column J, but as applied to Final Commitments.
- Column R: “Explanation of Differences Between Interim and Final Commitments.” For rows where the number of hex-9s is different between interim and final commitments (Columns K and Column S), explain the reason that the numbers are different in this column. The explanation should make clear whether there is an increase or decrease to the row and which, if any, corresponding row receives a decrease or increase in hex-9s by citing to the corresponding row’s id as identified in Column T.
- Column S: “Total Final Commitments.” Same instructions as Column K, but as applied to Final Commitments, which should automatically calculate the sum of Columns M and P. Final Commitments end December 31, 2034.
- Column T: “Row_ID.” This column provides a unique identifier for the row. The Row_ID stays the same even if the commitment rows are sorted differently.

¹³³ 47 CFR § 54.318(d)(2)(ii). This is the commitment deadline unless WTB extends this deadline or takes other further action consistent with its delegated authority. *Id.* While technically the single-support area and duplicate-support area commitments are separate performance plans, they will be filed in the same template document. *See* 47 CFR § 54.318(f)(5).

¹³⁴ *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, 12169, paras. 142, 162.

¹³⁵ 47 CFR § 54.318(d)(2)(i).

¹³⁶ This can change if WTB extends ACF Mobile Phase I in the duplicate-support areas to December 31, 2034. *Alaska Connect Fund Order*, 39 FCC Rcd at 12160, para. 143. Final-commitment columns are columns L-S.

Appendix C: Example of the Performance Plan Template

| A | B | C | D | E | F | G | H | I | J | K |
|---------------------|-------------------|------------------------|--|-------------------------------|--------------------------------|---|--|--|--|--|
| ADF Mobile Provider | Support Area Type | Census Tract FIPS Code | Census Populated Places or Alaska Native Village Statistical Area Affected | Interim Commitments TechSpeed | Interim Commitments Num. HezSs | Are any hez-9s in this row within 1.5 miles of a cell site of the provider? | Interim Commitments Notes | Comparable/Voluntary Areas: Additional Hez-9 Interim Commitments | Interim Commitments Comparable/Voluntary Areas Explanation | Total Interim Commitments (Column F + J) |
| Alaska Village Coop | Single | 02185000200 | Village Bay, Village Square | 5GNR 7_1Mbps | 200 | Yes | Not within a 15-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced | 1000 | Comparable commitment substitutes 1000 ineligible hez-9s in Point Sand (Tract: 2188000400) by adding 1000 hez-9s to the commitment in this tract | 1200 |
| Alaska Village Coop | Single | 02185000200 | Village Square | 5GNR 7_1Mbps | 10000 | No | Not within a 15-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced | 1000 | voluntary | 11000 |
| Alaska Village Coop | Duplicate | 02185000200 | Village Square | 4GLTE 5_1Mbps | 10000 | | NA | | | 10000 |
| Alaska Village Coop | Single | 02185000100 | Mountain Glacier | 5GNR 35_3Mbps | 10000 | Yes | Not within a 15-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced | 2500 | Comparable commitment substitutes 1000 ineligible hez-9s in Point Sand (Tract: 2188000400) by adding 1500 hez-9s to the commitment in this tract (Comparable Value analysis filed separately for the reduction of 500) | 12500 |
| Alaska Village Coop | Single | 02185000100 | Mountain Glacier | 5GNR 7_1Mbps | 8000 | No | Covered by a cell site that relies on satellite backhaul and is more than 50 miles away from a fiber or microwave middle-mile node | 1000 | Comparable commitment substitutes 1000 ineligible hez-9s in Point Water (Tract: 2188000500) by adding 1000 hez-9s to the commitment in this tract | 9000 |
| Alaska Village Coop | Single | 02185000100 | Mountain Glacier | 4GLTE 5_1Mbps | 1000 | Yes | Not within a 15-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced | | | 1000 |
| Alaska Village Coop | Single | 02150000300 | Big Town | 5GNR 7_1Mbps | 1000 | Yes | Other (supporting documentation required) | | | 1000 |
| Alaska Village Coop | Duplicate | 02150000300 | Big Town | 4GLTE 5_1Mbps | 8000 | | NA | | | 8000 |
| Alaska Village Coop | Single | 02185000500 | Point Water | 5GNR 7_1Mbps | 1000 | Yes | Other (supporting documentation required) | | | 1000 |

| L | M | N | O | P | Q | R | S | T |
|-----------------------------|------------------------------|---|---|--|---|---|--------------------------------------|--|
| Final Commitments TechSpeed | Final Commitments Num. HezSs | Are any hez-9s in this row within 1.5 miles of a cell site of the provider? | Final Commitments Notes | Comparable/Voluntary Areas: Additional Hez-9 Final Commitments | Final Commitments Comparable/Voluntary Areas Explanation | Explanation of Differences Between Interim and Final Commitments | Total Final Commitments (Column M+P) | Row ID |
| 5GNR 35_3Mbps | 200 | Yes | Not within a 15-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced transport rates | 1000 | Comparable commitment substitutes 1000 ineligible hez-9s in Point Sand (Tract: 2188000400) by adding 1000 hez-9s to the commitment in this tract | | 1200 | 02185000200_5GNR 7_1Mbps_5GNR 35_3Mbps |
| 5GNR 7_1Mbps | 10000 | No | Covered by a cell site that relies on satellite backhaul and is more than 50 miles away from a fiber or microwave middle-mile node | 1000 | voluntary | | 11000 | 02185000200_5GNR 7_1Mbps_5GNR 7_1Mbps_02185000200_4GLTE 5_1Mbps_ |
| 5GNR 35_3Mbps | 14000 | Yes | Not within a 15-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced transport rates | 2500 | Comparable commitment substitutes 1000 ineligible hez-9s in Point Water (Tract: 2188000500) by adding 1500 hez-9s to the commitment in this tract (Comparable Value analysis filed separately for the reduction of 500) | Includes 4000 more hez-9s at this speed commitment due to an addition of a cell site (4000 hez-9s removed between Columns F and L from 02185000100_5GNR 7_1Mbps_5GNR 7_1Mbps) | 16500 | 02185000100_5GNR 35_3Mbps_5GNR 35_3Mbps |
| 5GNR 7_1Mbps | 4000 | No | Covered by a cell site that relies on satellite backhaul and is more than 50 miles away from a fiber or microwave middle-mile node | 1000 | Comparable commitment substitutes 1000 ineligible hez-9s in Point Water (Tract: 2188000500) by adding 1000 hez-9s to the commitment in this tract | Reduction by 4000 hez-9s between Columns F and L due to an increase in commitment at 02185000100_5GNR 35_3Mbps_5GNR 35_3Mbps | 5000 | 02185000100_5GNR 7_1Mbps_5GNR 7_1Mbps |
| 4GLTE 5_1Mbps | 1000 | Yes | Not within a 15-mile radius of a cell site that has access to fiber- or microwave-based backhaul and competitively priced transport rates | | | | 1000 | 02185000100_4GLTE 5_1Mbps_4GLTE 5_1Mbps |
| 5GNR 7_1Mbps | 1000 | Yes | NA | | | | 1000 | 02150000300_5GNR 7_1Mbps_5GNR 7_1Mbps_02150000300_4GLTE 5_1Mbps_NA |
| 5GNR 7_1Mbps | 1200 | Yes | Other (supporting documentation required) | | | Includes 200 more hez-9s due to cell added | 1200 | 02185000500_5GNR 7_1Mbps_5GNR 7_1Mbps |