



PUBLIC NOTICE

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WIRELINE COMPETITION BUREAU REMINDS RURAL DIGITAL OPPORTUNITY FUND CARRIERS OF SEPTEMBER 1 FABRIC CHALLENGE FILING DATE, DIRECTS CARRIERS TO CHALLENGE PROCESS RESOURCES, AND PROVIDES GUIDANCE ON COMPLIANCE ISSUES

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

By this Public Notice, the Wireline Competition Bureau (Bureau) provides further information and guidance related to the Commission's framework for adjusting required Rural Digital Opportunity Fund (RDOF) location totals based on the December 2026 (version 10) Broadband Serviceable Location (BSLs) Fabric (Fabric).¹

Fabric Challenge Process. We remind RDOF carriers that challenges to the Fabric (e.g., to add or remove BSLs, modify unit counts associated with BSLs) must be filed by September 1, 2026, in order to be considered for inclusion in the December 2026 Fabric.² In January 2025, the Bureau put carriers on notice that the results of any outstanding or pending challenges that were filed but not incorporated in the December 2026 Fabric will not be incorporated into the final RDOF list.³ Accordingly, we highly encourage RDOF carriers to file Fabric challenges as soon as possible and no later than September 1.

The Broadband Data Task Force recently announced that the June 2026 (version 9) Fabric is available to licensees.⁴ The High-Cost Universal Broadband (HUBB) portal will not be updated to reflect the June 2026 Fabric and the Bureau will not be releasing interim RDOF lists based on the June 2026 Fabric. Instead, we will update the HUBB and release updated RDOF lists when the December 2026 Fabric becomes available. However, RDOF carriers should review the June 2026 Fabric and file

¹ The Commission directed the Bureau to use an updated data source to determine the actual number of locations on the ground and publish adjusted location counts for RDOF carriers prior to the sixth year service milestone. *Rural Digital Opportunity Fund et al.*, WC Docket No. 19-126 et al., Report and Order, 35 FCC Rcd 686, 709-11, paras. 45-52 (2020) (*RDOF Order*). In January 2025, the Bureau adopted the December 2026 Fabric as the source for the adjusted location counts. *Connect America Fund et al.*, WC Docket No. 10-90 et al., Order, 40 FCC Rcd 281, 284-85, 291-92, paras. 9, 25 (WCB 2025) (*High-Cost Fabric Order*).

² FCC, *Broadband Data Collection*, <https://www.fcc.gov/BroadbandData> (last visited July 7, 2026); *Broadband Data Task Force and Office of Economics and Analytics Announce Opening of Broadband Data Collection Filing Window, Fabric Challenge Deadline, and BDC Data Archival Policy*, WC Docket Nos. 11-10, 19-195, Public Notice, DA 26-630, at 3 (BDTF/OEA June 26, 2026) (*June 2026 Fabric Public Notice*).

³ *High-Cost Fabric Order*, 40 FCC Rcd at 292, para. 25.

⁴ *June 2026 Fabric Public Notice* at 3.

challenges to the extent they identify any inaccuracies in their service areas. Providers who are already licensees of the Fabric received an email from CostQuest, the FCC's Fabric contractor, providing them with links to access the June 2026 Fabric data. Providers that have not entered into a license agreement with CostQuest for Fabric data may do so by following the instructions for obtaining access to the Fabric in the Broadband Data Collection (BDC) Help Center.⁵

The Commission recently made support resources available through the BDC Help Center to assist carriers with reconciling their internal data with Fabric data.⁶ Please visit <https://help.bdc.fcc.gov/hc/en-us> regularly for updates and new support resources. Carriers that have questions about the Fabric challenge process can contact the BDC team by initiating a request with the Help Center at <https://help.bdc.fcc.gov/hc/en-us/requests/new> or by emailing BroadbandDataInquiries@fcc.gov.

Timing of Final RDOF Lists. The Bureau previously explained that we would announce adjusted location totals for each RDOF carrier within a reasonable time after the December 2026 Fabric is made available to licensees.⁷ We anticipate that we will post location lists based on the December 2026 Fabric in January 2027, and USAC will update the HUBB to reflect these location lists around the same time. We expect to release a public notice in or around May 2027 adopting these lists as the final RDOF location lists, adjusted location totals, and any authorized support adjustments. More information about the timeline for transitioning to the Fabric is available at: <https://www.fcc.gov/wireline-competition/HUBB-Transition>.

In this public notice the term "location" refers to the total number of units associated with BSLs in a carrier's service area.

Carriers that have fewer locations on the December 2026 Fabric than estimated by the Connect America Cost Model (CAM) (model-estimated) shall submit a notification in ECFS in WC Docket Nos. 10-90 and 19-126 and AU Docket No. 20-34 by March 1, 2027, and may incorporate the Fabric by reference by certifying that there are fewer locations identified in the latest version of the Fabric in their relevant service areas than the carrier's model estimated locations total.⁸

Interim Service Milestones. The 40%, 60%, and 80% interim service milestones for all RDOF carriers will continue to be based on the model-estimated number of locations at the time of authorization.⁹ That is, if an RDOF carrier was originally authorized to offer the required service to 100 model-estimated locations, it will be required to offer the required service to 80 locations to meet the 80%

⁵ FCC, *Broadband Data Collection Help Center*, "The Location Fabric," <https://help.bdc.fcc.gov/hc/en-us/categories/10275178002075-The-Location-Fabric> (last visited July 7, 2026).

⁶ See FCC, *Broadband Data Collection Help Center*, "How to Align Your Location Data to the Broadband Serviceable Location Fabric," <https://help.bdc.fcc.gov/hc/en-us/articles/48535890138907-How-to-Align-Your-Location-Data-to-the-Broadband-Serviceable-Location-Fabric> (last updated May 13, 2026).

⁷ *High-Cost Fabric Order*, 40 FCC Rcd at 291-92, para. 25.

⁸ 47 CFR § 54.802(c)(1)(ii); *RDOF Order*, 35 FCC Rcd at 711, para. 51; *High-Cost Fabric Order*, 40 FCC Rcd at 298-99, para. 41.

⁹ 47 CFR § 54.802(c)(1); *RDOF Order*, 35 FCC Rcd at 709, para. 45. If a carrier has transferred a portion of its RDOF support and obligations through a section 214 transaction, the Bureau will use the carrier's remaining required model-estimated location total to calculate service milestones. 47 U.S.C. § 214(a), 47 CFR §§ 63.03, 63.04. If a carrier has defaulted on certain census block groups early, we will use the carrier's original authorized model-estimated location total unless the Bureau has granted the carrier a waiver to pay a portion of its support recovery early and the carrier has timely paid the associated support recovery. See, e.g., *Connect America Fund et al.*, WC Docket No. 10-90 et al., Order, 39 FCC Rcd 12627 (WCB 2024) (*RTC Early Support Recovery Order*).

service milestone, regardless of how many actual locations there are in the service area based on the Fabric.

If a carrier offers the required service to all actual locations in its service area and there are not enough actual locations for the carrier to meet an interim service milestone, the carrier should request a verification from USAC to demonstrate that it offers the required service to all locations based on the June 2026 Fabric or the December 2026 Fabric, whichever is the latest available version of the Fabric. Verifications can be requested by emailing HCverifications@usac.org. If a carrier offers the required service to all actual locations, but the carrier believes the June 2026 Fabric is inaccurate (e.g., the Fabric includes BSLs that the carrier believes are not actually BSLs, BSLs have an associated unit count that the carrier believes is incorrect), the carrier must be able to demonstrate to USAC that it has submitted challenges to the Fabric for those BSLs before USAC will initiate a verification. USAC will not complete its verification and find the carrier offers the required service to 100% of locations until the carrier is able to demonstrate that the challenges were resolved in the carrier's favor.

Once USAC has completed its verification and has determined the carrier offers the required service to all actual locations in its RDOF service area, the carrier must file a petition seeking waiver of any applicable interim service milestones (i.e., 40%, 60% and/or 80%). The Bureau will find good cause to grant the waiver if the carrier has successfully completed USAC's verification process and has been found to be offering the required service to 100% of actual locations.¹⁰ If the waiver is granted, the carrier must monitor the Fabric. At the end of the one-year cure period following its sixth year 100% service milestone, the carrier must either offer the required service to all locations in its service area based on the December 2026 Fabric if there are fewer locations in the carrier's service area than originally model-estimated or offer the required service to the number of model-estimated locations if there are the same number or more locations in the carrier's service area based on the December 2026 Fabric than in the original model-estimate.¹¹

Final Service Milestones. More guidance regarding the calculations for the support recovery and non-compliance support adjustments after the sixth year and eighth year 100% service milestones is forthcoming. Here, we provide guidance regarding the timing for the support recovery and non-compliance adjustments.

After the conclusion of the one-year cure period following the sixth year 100% service milestone,¹² the Commission will initiate support recovery pursuant to section 54.806(c)(1)(i) for any RDOF carriers that do not offer the required service to: 1) 100% of the adjusted location total for carriers that have an adjusted location total that is less than their original authorized model-estimated total, or 2) 100% of their original authorized model-estimated total for carriers that have an adjusted location total that is equal to or more than their original authorized model-estimated total.¹³ The support recovery will be initiated after the March 1, 2029 HUBB reporting deadline (for carriers authorized in 2021) and March

¹⁰ *High-Cost Fabric Order*, 40 FCC Rcd at 300-01, para. 45. See, e.g., *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, WC Docket No. 10-90 et al., Public Notice, DA 26-497, at 25 & n.42 (WCB June 1, 2026) (granting a RDOF carrier's petition for waiver of the 60% and 80% RDOF service milestones after it was verified to have served 100% of existing locations in its RDOF service area).

¹¹ *High-Cost Fabric Order*, 40 FCC Rcd at 299-300, para. 44.

¹² For carriers authorized in 2021, the sixth year 100% service milestone is December 31, 2027 and the cure period ends December 31, 2028. For carriers authorized in 2022 and 2023, the sixth year 100% service milestone is December 31, 2028 and the cure period ends December 31, 2029.

¹³ 47 CFR § 54.806(c)(1)(i); *RDOF Order*, 35 FCC Rcd at 715, para 60.

1, 2030 HUBB reporting deadline (for carriers authorized in 2022/2023).¹⁴ Specifically, the carrier will receive a letter from the Bureau describing the calculation for the support recovery and then the Bureau will direct USAC to send an invoice that the carrier must pay within six months. Once a carrier has timely paid the required support recovery, it will be permitted to close out its letter of credit.¹⁵ If at the end of six months the carrier has not fully repaid the required amount, the Bureau will issue a letter to that effect and USAC will draw on the letter of credit to recover all of the unpaid support recovery covered by the letter of credit.¹⁶

Carriers that have an adjusted location total that exceeds their original authorized model-estimated total have two more years to offer the required service to the additional locations.¹⁷ After the conclusion of the one-year cure period following the eighth year service milestone,¹⁸ the Bureau will initiate support recovery pursuant to section 54.806(c)(1)(ii) for RDOF carriers that did not offer the required service to 100% of their additional locations.¹⁹ The carrier will receive a letter from the Bureau describing the calculation for the support recovery and then the Bureau will direct USAC to send an invoice that the carrier must pay within six months. Carriers that do not make a timely payment will be subject to non-compliance measures.²⁰

In addition to initiating support recovery for carriers that do not offer the required service to the required number of locations by the sixth year and eighth year service milestones, the Bureau will also reduce such carrier's ongoing support on a pro rata basis to account for the required number of locations to which they do not offer the required service, as those locations will not be included in the carrier's list of RDOF locations reported in the HUBB and are ineligible for further support going forward.²¹ Such adjustments will be made after the March 1st filing deadline that follows the applicable one-year cure period and will be retroactively applied to any payments made after the sixth and eighth year 100% service milestones. To the extent feasible, USAC will pro rate RDOF carriers' future support disbursements to implement this adjustment, but if the RDOF carrier does not have enough remaining support to cover the adjustments, USAC may recover support in a lump sum.

RDOF Locations Unreasonable to Serve Process. In the *High-Cost Fabric Order*, the Bureau adopted a process for carriers that are required to deploy to more locations than their original authorized model-estimated location total to demonstrate that there are locations in their service areas that are unreasonable to serve beyond their minimum originally authorized model-estimated number of locations.²² As the Bureau previously explained, we do not expect to routinely grant requests to exclude

¹⁴ 47 CFR § 54.316(c).

¹⁵ *High-Cost Fabric Order*, 40 FCC Rcd at 299, para. 42.

¹⁶ 47 CFR § 54.804(c)(4)(i); *RDOF Order*, 35 FCC Rcd at 715, para. 63.

¹⁷ 47 CFR § 54.802(c)(1)(i); *RDOF Order*, 35 FCC Rcd at 710, para. 49.

¹⁸ For carriers authorized in 2021, the eighth year 100% service milestone is December 31, 2029 and the cure period ends December 31, 2030. For carriers authorized in 2022 and 2023, the eighth year 100% service milestone is December 31, 2030 and the cure period ends December 31, 2031.

¹⁹ 47 CFR § 54.806(c)(1)(ii); *RDOF Order*, 35 FCC Rcd at 715, para. 61.

²⁰ See, e.g., 47 CFR § 54.320(c); *RDOF Order*, 35 FCC Rcd at 715, para. 63; *High-Cost Fabric Order*, 40 FCC Rcd at 301, para. 45.

²¹ 47 CFR § 54.320(c); *RDOF Order*, 35 FCC Rcd at 715-16, para. 63.

²² *High-Cost Fabric Order*, 40 FCC Rcd at 295-98, paras. 33-39. See also *RDOF Order*, 35 FCC Rcd at 710-11, para. 50.

locations from a carrier's new location total, particularly given that carriers had the responsibility to conduct due diligence prior to bidding and the Commission expected RDOF carriers would offer the required service throughout their entire service areas.²³ Accordingly, the Bureau will subject carriers that make such requests to a rigorous, thorough, and searching review.²⁴

The Bureau and USAC will be setting up a system to collect these requests. We anticipate that we will make the system available for eligible carriers to submit requests when we release a public notice in or around May 2027 adopting the final RDOF location lists, adjusted location totals, and any support adjustments. At that time, carriers will have six months to submit a request(s) that a location is unreasonable to serve.²⁵ Carriers that have adjusted location totals that are equal to or less than their original authorized model-estimated location totals will not be able to access the system. More information about this process is forthcoming.

Anticipated Timeline for Fabric Releases, RDOF Final Location Lists, and RDOF Unreasonable to Serve Locations Process

By June 30, 2026	June 2026 Fabric released to licensees
September 1, 2026	Fabric challenges must be filed by this date in order to be considered for inclusion in the December 2026 Fabric
December 2026	December 2026 Fabric released to licensees; December 31, 2026 is also the 60% service milestone for carriers authorized in 2022/2023 and 80% service milestone for carriers authorized in 2021, based on the model-estimated location total
January 2027	Bureau posts RDOF lists based on December 2026 Fabric on FCC's website; HUBB is updated with December 2026 Fabric lists
March 1, 2027	HUBB filing deadline; Deadline for carriers with fewer locations than model-estimated to submit notification to Bureau
In or around May 2027	Bureau adopts final RDOF location lists, adjusted location totals, and adjusted support amounts; Window opens for eligible RDOF carriers to submit RDOF Unreasonable to Serve Locations Process requests
Six months post-adoption of RDOF final location lists	Window for eligible carriers to submit RDOF Unreasonable to Serve Locations Process requests closes

The table above provides Bureau's anticipated timeline, but we advise carriers to check the HUBB Transition webpage, <https://www.fcc.gov/wireline-competition/HUBB-Transition>, for any updates and all future dates, including timing for support recovery.

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²³ *High-Cost Fabric Order*, 40 FCC Rcd at 296-97, paras. 34-36; *RDOF Order*, 35 FCC Rcd at 710, para. 47 (explaining the Commission "requir[ed] build-out to the entire designated area even in light of the possibility that location numbers could change").

²⁴ *High-Cost Fabric Order*, 40 FCC Rcd at 296-97, paras. 34-36.

²⁵ *Id.* at 297, para. 37.