

A step-by-step guide for completing FCC Form 5640: *Notification of Ownership Changes*

OMB Control No. 3060-1270



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Background

The Secure and Trusted Communications Networks Act of 2019 (Secure Networks Act), as amended, directed the Federal Communications Commission (FCC or Commission) to establish the Secure and Trusted Communications Networks Reimbursement Program (Reimbursement Program or SCRP).¹ The purpose of the Reimbursement Program is to reimburse providers of advanced communications services with ten million or fewer customers for costs reasonably incurred in the removal, replacement, and disposal of communications equipment or services produced or provided by Huawei Technologies Company (Huawei) or ZTE Corporation (ZTE) (or their parents, subsidiaries, or affiliates) and obtained on or before June 30, 2020 (Covered Communications Equipment or Services).²

In the 2020 Supply Chain Order, the Commission adopted rules for the Reimbursement Program, which are codified in section 1.50004 of its rules.³ The Commission revised these rules in the 2021 Supply Chain Order and provided additional guidance on the application and reimbursement process in the Finalized Reimbursement Process Public Notice, including FCC Form 5640 Part C: Application Request for Funding Allocation (FCC Form 5640 Part C) and a Catalog of Eligible Expenses and Estimated Costs (Cost Catalog), and separately on the disposal process.⁴

On July 15, 2022, the Wireline Competition Bureau (Bureau) issued decisions approving and denying applications submitted for Reimbursement Program support. Applicants that were

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¹ Secure and Trusted Communications Act of 2019, Pub. L. No. 116-124, 134 Stat. 158 (2020) (codified as amended at 47 U.S.C. § 1601-1609) (Secure and Trusted Communications Networks Act); Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, § 901, 134 Stat. 1182 (2020) (CAA).

² Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89, Third Report and Order, 36 FCC Rcd 11958, 11965-78, 11992-96, paras. 18-46, 85-94 (2021) (2021 Supply Chain Order); see also Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89, Second Report and Order, 35 FCC Rcd 14284, 14309-10, paras. 51-54 (2020) (2020 Supply Chain Order) (interpreting "communications equipment or service").

³ 47 CFR § 1.50004; 2020 Supply Chain Order, 35 FCC Rcd at 14374-83, Appx. A.

⁴ 2021 Supply Chain Order, at Appx. A; Wireline Competition Bureau Finalizes Application Filings, Procedures, Cost Catalog, and Replacement List for the Secure and Trusted Communications Networks Reimbursement Program, WC Docket No. 18-89, Public Notice, 36 FCC Rcd 12190 (WCB Aug. 3, 2021) (Finalized Reimbursement Process Public Notice); Wireline Competition Bureau Announces Best Practices for Equipment Disposal and Revises FCC Form 5640 Certifications for the Secure and Trusted Communications Networks Reimbursement Program, WC Docket No. 18-89, Public Notice, 36 FCC Rcd 14061 (WCB Sept. 30, 2021).



approved to receive an allocation (Recipients)⁵ received an approval email from the Bureau and the Bureau announced these allocations in a July 18, 2022 Public Notice.⁶

Purpose and Scope of this User Guide

This document is a guide for Recipients to consult when submitting a Notification of Ownership Change. Recipients will file a Notification of Ownership Change signed by both parties to the transaction that includes an explanation of the ownership changes. In the event of an involuntary change of ownership and/or control, the Recipient may file the notification without the signature of the other party to the transaction upon filing the appropriate documentation regarding the change of ownership and/or control. The Bureau, with the assistance of the Reimbursement Program Fund Administrator, will determine the amount of funding not yet claimed and disbursed through the reimbursement claim process, and how to handle transactions involving the acquisition of discrete network components. Prior approval for new owners to participate in the Reimbursement Program is not required; however, new owners must be eligible to participate in the Reimbursement Program to receive funding under the Commission's rules and comply with all Reimbursement Program rules and procedures.⁷

This User Guide provides informal guidance intended to assist Recipients as they proceed with this Reimbursement Program process and does not constitute legal advice. Recipients remain solely responsible for reviewing and complying with all statutory provisions, rules, FCC precedent, and program procedures.

⁵ The Secure Networks Act defines "recipient" as "any provider of advanced communications service the application of which for a reimbursement under the [Reimbursement] Program has been approved by the Commission, regardless of whether the provider has received reimbursement funds." 47 U.S.C. § 1608(11); see also 47 CFR § 1.50001 ("The term 'Reimbursement Program recipient' or 'recipient' means any eligible advanced communications service provider that has requested via application and been approved for funding in the Reimbursement Program, regardless of whether the provider has received reimbursement funds.").

⁶ Wireline Competition Bureau Announces the Grant of Applications for the Secure and Trusted Communications Networks Reimbursement Program, WC Docket No. 18-89, Public Notice, DA 22-774 (WCB July 18, 2022).

⁷ Wireline Competition Bureau Finalizes Application Filings, Procedures, Cost Catalog, and Replacement List for the Secure and Trusted Communications Networks Reimbursement Program, WC Docket No. 18-89, Public Notice, DA-21-947 (WCB August 3, 2021). Eligibility in the Reimbursement Program is limited to advanced communications service providers with fewer than 10 million customers that obtained at least one piece of Huawei and/or ZTE equipment and services on or before June 30, 2020.



Instructions for Submitting a Notification of Ownership Change

To begin the Notification of Ownership Change process, the Recipient will log into the <u>SCRP Online Portal</u> and navigate to the *Program Participant File*. After opening this file, the Recipient will click 'Create New Filing,' then click **Notification of Ownership Change** (Figure 1).

Filer Information

The Recipient will begin this section by ensuring that the "Filer Information" is accurate, including FRN, Applicant Name, Email, Phone Number, Street Name,

City, State, and Zip Code (Figure 2). This information will be automatically populated from the FCC Form 5640 Part C filing.

Contact Information

In this section, the Recipient will input the "Contact Information" (Figure 3). This information may be automatically populated from Part C by clicking the

"Contact same as Filer" checkbox, but Recipients will have the ability to edit the information, if necessary. If the Recipient needs to manually input its contact information, it will complete the following fields: Contact Name, Phone Number, Email, Street Name, City, State (utilizing the drop-down menu), and Zip Code.

Type of Ownership Change

In this section, the Recipient will identify the type of ownership change it is reporting by answering the following questions (Figure 4):

 Is this a transfer of control or an assignment of assets? If "Assignment of Assets" is selected, then the Recipient will be



Figure 1: Notification of Ownership Change

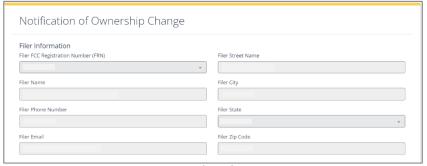


Figure 2: Filer Information



Figure 3: Contact Information

If the primary contact representative for the Recipient is different from the contact listed in the Applicant Information section, the Recipient should update this section and ensure that the **point of contact listed is easily contactable** through the information provided.



Figure 4: Type of Ownership Change



prompted to answer the following question:

- o Is the assignment a full or partial assignment of assets?
- Is the ownership change pro forma or non-pro forma in nature?

The Recipient will also need to indicate the date of consummation and include an attachment describing the ownership change.

Depending on how the questions in this section are answered, the Recipient may be prompted with additional questions and sub-sections to complete.

Recipients may refer to the following sub-sections in this User Guide for guidance on how to complete the additional questions according to the type of ownership change they are filing.

- Transfer of Control, Pro-forma (Page 7)
- Transfer of Control, Non pro-forma (Page 8)
- Assignment of Assets, Pro-forma (Page 10)
- Assignment of Assets, Non pro-forma (Page 13)

Definition of terms in Type of Ownership Change section:

- Transfer of Control, Pro-forma The ownership change does not result in a change in the Recipient's ultimate ownership or control of the company.
- Transfer of Control, Non pro-forma The ownership change does result in a change in the Recipient's ultimate ownership or control of the company
- Assignment of Assets, Pro-forma The ownership change does not result in a change in the Recipient's ultimate ownership or control of the assets of the company
- Assignment of Assets, Non pro-forma The ownership change does result in a change in the Recipient's ultimate ownership or control of the assets of company

Transfer of Control, Pro-forma

If the Recipient is filing a *Transfer of Control, Pro-forma*, it must complete the following subsections.

Program Participant's Real Party in Interest Information

In this section, the Recipient will ensure that its "Program Participant's Real Party in Interest Information" (Figure 5) is accurate, including FCC Registration Number for Real Party in Interest prior to

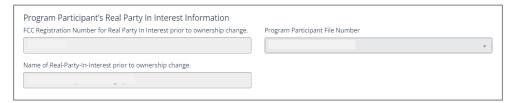


Figure 5: Program Participant's Real Party in Interest Information

ownership change, Name of Real Party in Interest prior to ownership change, and Program Participant File Number.

Proceed to the **Certifier Information** section (page 16).

Transfer of Control, Non Pro-forma

If the Recipient is filing a *Transfer of Control, Non Pro-forma*, it must complete the following subsections.

Program Participant's Real Party in Interest Information

In this section, the Recipient will ensure that its "Program Participant's Real Party in Interest Information" (Figure 6) is accurate, including FCC Registration Number for Real Party in Interest prior to

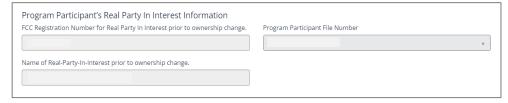


Figure 6: Program Participant's Real Party in Interest Information

ownership change, Name of Real Party in Interest prior to ownership change, and Program Participant File Number.

Updated Real Party in Interest Information

In this section, the Recipient will enter the FCC Registration Number for Real Party in Interest post-ownership change consummation. The Recipient



Figure 7: Updated Real Party in Interest Information

will also ensure that the Name of the Real Party in Interest post-ownership change consummation is accurately populated (Figure 7).

Program Eligibility Post-Consummation

In this section, the Recipient must answer "yes" or "no" to the questions outlined below (Figure 8):

> Is Program Participant post-consummation of the ownership change a



Figure 8: Program Eligibility Post-Consummation

provider of advanced communications service with 10 million or fewer customers?

If the Recipient answers "yes" and there is no record of the Recipient filing FCC Form 477 in the most recent reporting period, then the Recipient will need to provide supporting documentation in the **Attachments** section.

 Is Program Participant post-consummation of the ownership change a provider of advanced communications service with 2 million or fewer customers?



If the Recipient answers "yes" and there is no record of the Recipient filing FCC Form 477 in the most recent reporting period, then the Recipient will need to provide supporting documentation in the **Attachments** section.

 Has the Program Participant, postconsummation of the ownership, previously purchased, leased, or otherwise obtained communications equipment or services on the Covered List that was produced or provided by Huawei Technologies Company or ZTE Corporation, including their affiliates and subsidiaries, on or before June 30, 2020?

Having at least one piece of existing Huawei or ZTE equipment or service is a requirement for eligibility in the Reimbursement Program.

Proceed to the **Certifier Information** section (page 16).



"Customers" is interpreted to include customers of the Program Participant post-consummation and customers of any affiliate taking advanced communications service from the provider and its affiliates as of the date the Notification of Ownership Change is filed.

If a Program Participant post-consummation answers "no" to these questions, it will not be considered eligible for the Reimbursement Program. If a Program Participant post-consummation still believes it should be considered eligible, it should provide supporting documentation in the **Attachments** section. Form 477 is required for all facilities-based broadband providers to file data with the FCC twice a year on where it offers internet access service at speeds exceeding 200 kbps in at least one direction.

Examples of Supporting Documentation Program Participants post-consummation could include:

- Information from the Recipient's website describing services provided to customers
- Information from the Program Participant postconsummation's website describing services provided to customers
- 3. A catalog of services provided to customers
- Annual public financial reports demonstrating number of customers and/or broadband services provided

More information on Program eligibility and types of supporting documentation can be found in the FAQs.



Assignment of Assets, Pro-forma

If the Recipient is filing an Assignment of Assets, Pro-forma, it must complete the following subsections.

Program Participant's Real Party in Interest Information

In this section, the Recipient will ensure that its "Program Participant's Real Party in Interest Information" (Figure 9) is accurate, including FCC Registration Number for Real Party in Interest prior to ownership change, Name of

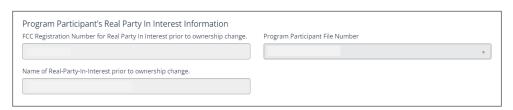


Figure 9: Program Participant's Real Party in Interest Information

Real Party in Interest prior to ownership change, and Program Participant File Number.

New Program Participant's Information

In this section, the Recipient will enter the New Program Participant's FCC Registration Number (FRN) and also ensure the following fields are accurately populated: New Program Participant's Name, Phone Number, Email, Street Name, City, State, and Zip Code (Figure 10).

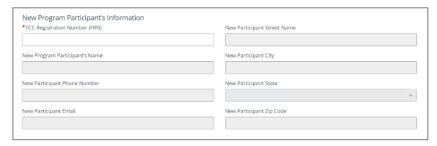


Figure 10: New Program Participant's Information

Contact Information for New Program Participant

In this section, the Recipient will input the New Program Participant's contact information by completing the following fields: Contact Name, Phone Number, Email, Street Name, City, State (utilizing the drop-down menu), and Zip Code (Figure 11).

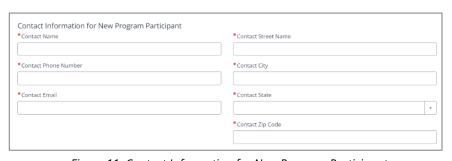


Figure 11: Contact Information for New Program Participant

Payment Information for New Program Participant

In this section, the Recipient will enter the New Program Participant's UEI (Unique Entity Identifier) and Commercial and Government Entity (CAGE) Code (Figure 12).



Figure 12: Payment Information for New Program Participant

New Program Participant Type

In this section, the Recipient will identify the New Program Participant's primary U.S. State, District of Columbia, or U.S. Territory (from the drop-down menu) in which reimbursement support will be applied. The Recipient will also identify its type of entity (from the drop-down menu) and select up to 3 (Figure 13).

The Recipient will then answer "yes" or "no" to the questions outlined below:

 Is the new Program Participant a commercial broadband provider?

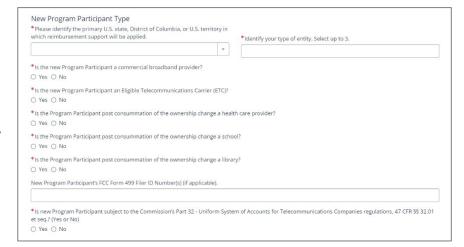


Figure 13: New Program Participant Type

 Is the new Program Participant an Eligible Telecommunications Company (ETC)? Note: if the Recipient answers "yes" to this question, it will be prompted to answer additional mandatory questions, including:

Identify ETC Status (from the drop-down menu), i.e.,
Incumbent Local Exchange
Carrier (ILEC) or Non-ILEC for new Program Participant;

If a Recipient's answer indicates that the new Program Participant is not a **Commercial broadband provider**, they will need to provide supporting documentation in **Attachments** to justify why the new Program Participant is eligible for the program yet does not identify as an Advanced Communications Services/Commercial Broadband Provider

- Please enter a list of Service Provider Identification Numbers (SPINs) (from the dropdown menu) that the new Program Participant uses to conduct transactions with the Universal Service Administrative Company (USAC);
- o Identify the Study Area Code(s) (from the drop-down menu) where the new Program Participant is designated as an ETC;
- Is the new Program Participant post-consummation of the ownership change a health care provider?
- Is the new Program Participant post-consummation of the ownership change a school?
- Is the new Program Participant post-consummation of the ownership change a library?
- New Program Participant's FCC Form 499 Filer ID Number(s) (which the Recipient can select from the drop-down menu), if applicable.
- Is new Program Participant subject to the Commission's Part 32 Uniform System of Accounts for Telecommunications Companies regulations, 47 CFR §§ 32.01 et seq.?



Definition of terms in New Program Participant Type section:

- ETCs Eligible telecommunications carriers (ETCs) as defined in 47 CFR § 54.201 receiving universal service fund support.
- ILEC/Non-ILEC Information used to identify if the filer is an ETC. ILEC refers to the term Incumbent Local Exchange Carrier.
- SPINs A Service Provider Identification Number (SPIN) (also known as a 498 ID) is a unique nine-digit number assigned to service providers that conduct business with the Universal Service Administrative Company (USAC). A SPIN is assigned when an FCC Form 498 is filed with USAC.
- FCC Form 499 Filer ID An FCC Form 499 Filer ID Number is a 6-digit identifier assigned to telecommunications providers that report quarterly and annual revenue to the FCC.
- Part 32 This question aimed at identifying Applicants that may raise duplicate recovery concerns. The Commission's Part 32 Uniform System of Accounts for Telecommunications Companies applies to "every incumbent local exchange carrier, as defined in section 251(h) of the Communications Act, and any other carrier that the Commission designates by order. This part refers to such carriers as 'companies' or 'Class B companies.' Incumbent local exchange carriers' successor or assign companies, as defined in section 251(h)(1)(B)(ii) of the Communications Act, that are found to be non-dominant by the Commission, will not be subject to this Uniform System of Accounts." 47 CFR § 32.11.

Proceed to the **Certifier Information** section (page 16).



Assignment of Assets, Non Pro-forma

If the Recipient is filing an Assignment of Assets, Non Pro-forma, it must complete the following subsections.

Program Participant's Real Party in Interest Information

In this section, the Recipient will ensure that its "Program Participant's Real Party in Interest Information" (Figure 14) is accurate, including FCC Registration Number for Real Party in Interest prior to ownership change, Name of

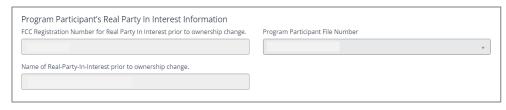


Figure 14: Program Participant's Real Party in Interest Information

Real Party in Interest prior to ownership change, and Program Participant File Number.

Updated Real Party in Interest Information

In this section, the Recipient will enter the FCC Registration Number for Real Party in Interest post-ownership change consummation. The Recipient



Figure 15: Updated Real Party in Interest Information

will also ensure that the Name of the Real Party in Interest post-ownership change consummation is accurately populated (Figure 15).

New Program Participant's Information

In this section, the Recipient will enter the FCC Registration Number (FRN) and also ensure the following fields are accurately populated: New Program Participant's Name, Phone Number, Email, Street Name, City, State (utilizing the drop-down menu), and Zip Code (Figure 16).

Contact Information for New Program Participant

In this section, the Recipient will complete the following fields: New Program Participant's Contact Name, Phone Number, Email, Street Name, City, State (utilizing the drop-down menu), and Zip Code (Figure 17).

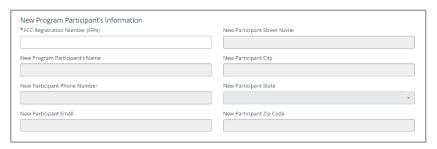


Figure 16: New Program Participant's Information

*Contact Name	*Contact Street Name
*Contact Phone Number	*Contact City
*Contact Email	*Contact State
	Contact Zip Code

Figure 17: Contact Information for New Program Participant



Payment Information for New Program Participant

In this section, the Recipient will enter the New Program Participant's UEI (Unique Entity Identifier) and Commercial and Government Entity (CAGE) Code (Figure 18).

Payment Information for New Program Participant			
*UEI	*Commercial and Government Entity (CAGE) Code		

Figure 18: Payment Information for New Program Participant

New Program Participant Type

In this section, the Recipient will identify the New Program Participant's primary U.S. State, District of Columbia, or U.S. Territory (from the drop-down menu) in which reimbursement support will be applied. The Recipient will also identify its type of entity (from the drop-down menu) and select up to 3 (Figure 19).

The Recipient will then answer "yes" or "no" to the questions outlined below:

- Is the new Program Participant a Commercial broadband provider?
- Is the new Program Participant an Eligible Telecommunications Company (ETC)? Note: if the Recipient answers 'yes' to this question, it will be prompted to answer additional mandatory questions, including:
 - Identify ETC Status (from the dropdown menu), i.e., Incumbent Local Exchange Carrier (ILEC) or Non-ILEC for new Program Participant;
 - Please enter a list of Service Provider Identification Numbers (SPINs) (from the dropdown menu) that the new Program Participant uses to conduct transactions with the Universal Service Administrative Company (USAC);
 - o Identify the Study Area Code(s) (from the drop-down menu) where new Program Participant is designated as an ETC.
- Is the new Program Participant post-consummation of the ownership change a health care provider?
- Is the new Program Participant post-consummation of the ownership change a school?
- Is the new Program Participant post-consummation of the ownership change a library?
- New Program Participant's FCC Form 499 Filer ID Number(s) (which the Recipient can select from the drop-down menu), if applicable.
- Is new Program Participant subject to the Commission's Part 32 Uniform System of Accounts for Telecommunications Companies regulations, 47 CFR §§ 32.01 et seq.?

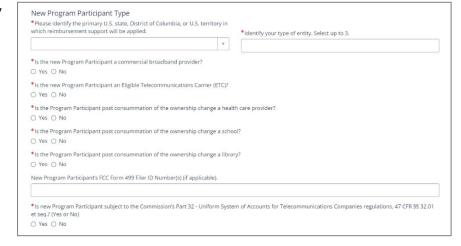


Figure 19: New Program Participant Type

Advanced Communications Services/Commercial Broadband Provider.

Definition of terms in New Program Participant Type section:

- ETCs Eligible telecommunications carriers (ETCs) as defined in 47 CFR § 54.201 receiving universal service fund support.
- ILEC/Non-ILEC Information used to identify if the filer is an ETC. ILEC refers to the term Incumbent Local Exchange Carrier.
- SPINs A Service Provider Identification Number (SPIN) (also known as a 498 ID) is a unique nine-digit number assigned to service providers that conduct business with the Universal Service Administrative Company (USAC). A SPIN is assigned when an FCC Form 498 is filed with USAC.
- FCC Form 499 Filer ID An FCC Form 499 Filer ID Number is a 6-digit identifier assigned to telecommunications providers that report quarterly and annual revenue to the FCC.
- Part 32 This question aimed at identifying Applicants that may raise duplicate recovery concerns. The Commission's Part 32 Uniform System of Accounts for Telecommunications Companies applies to "every incumbent local exchange carrier, as defined in section 251(h) of the Communications Act, and any other carrier that the Commission designates by order. This part refers to such carriers as 'companies' or 'Class B companies.' Incumbent local exchange carriers' successor or assign companies, as defined in section 251(h)(1)(B)(ii) of the Communications Act, that are found to be non-dominant by the Commission, will not be subject to this Uniform System of Accounts." 47 CFR § 32.11.

Program Eligibility Post-Consummation

If the Recipient is filing an Assignment of Assets, Non Proforma as a Full Assignment, it must answer "yes" or "no" to the questions outlined below (Figure 20).

Program Eligibility Post Consummation

* is Program Participant post consummation of the ownership change a provider of advanced communications service with 10 million or fewer customers?

O Yes O No

* is Program Participant post consummation of the ownership change a provider of advanced communications service with 2 million or fewer customers?

O Yes O No

* Has the Program Participant post consummation of the ownership previously purchased, leased, or otherwise obtained communications equipment or services on the Covered List that was produced or provided by Huawei Technologies Company or ZTE Corporation, including their affiliates and subsidiaries, on or before June 30, 2020?

O Yes O No

• Is Program Participant Figure 20: Program Eligibility Post-Consummation post-consummation of the ownership change a provider of advanced communications service with 10 million or fewer customers?

Note: If the Recipient answers "yes" and there is no record of the Recipient filing FCC Form 477 in the most recent reporting period, then the Recipient will need to provide supporting documentation in the **Attachments** section.

- Is Program Participant post-consummation of the ownership change a provider of advanced communications service with 2 million or fewer customers?
- Has the Program Participant post consummation of the ownership previously purchased, leased, or otherwise obtained communications equipment or services on the Covered List that was produced or provided by Huawei Technologies Company or ZTE Corporation, including their affiliates and subsidiaries, on or before June 30, 2020.

Proceed to the **Certifier Information** section.

Certifier Information

In this section, the Recipient Certifying Official must certify on behalf of the filer and the new Program Participant, if applicable, to the accuracy of the Recipient's Notification of Ownership Change



Figure 21: Certifier Information

by ticking the box in the Certifications section and completing the Certifier Information section (Figure 21). The Date Signed will automatically populate. This section is the equivalent of electronically signing the Notification of Ownership Change.

Attachments

In this section, Recipients must upload any required attachments indicated above and can also upload additional documentation that they believe may be beneficial to the review of their Notification of Ownership Change, such as a cover letter or other explanation (Figure 22).

If uploading additional attachments here, Recipients will need to include a short description, the category of the attachment (from the drop-down menu), and indicate if it is to remain confidential (Figure 6). When seeking confidential treatment for attachments categorized as "Other," the Recipient

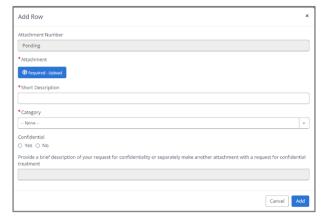


Figure 22: Attachments Pop-Up

must also provide a brief description of the request for confidentiality or separately make another attachment with the justification as to why the information is entitled to confidential treatment. That request for confidentiality will be made publicly available. Attachments for which confidential treatment is sought will be withheld from routine public inspection. Redacted versions of these attachments and attachments not indicated as containing confidential information will be subject to routine public inspection. Multiple attachments can be added. After an attachment is added, it will be reflected in a row.

Once ready to submit, Recipients will then submit their Notification of Ownership Change by clicking on the blue "Submit" button on the bottom right of the page.

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⁸ See Finalized Reimbursement Process Public Notice, 36 FCC Rcd at 12214, para. 70.



Responding to Requests for Information in the SCRP Online Portal

The Fund Administrator and the FCC may ask the Recipient to respond to a Request for Information (RFI) about a submitted Notification of Ownership Change. Recipients will receive an RFI notification via email and should respond to the RFI request within the SCRP Online Portal. The RFI notification will unlock the Notification of Ownership Change to allow revisions. Failure to respond to a RFI could potentially result in a delay in, or denial of, funding.

After logging into the SCRP Online Portal, Recipients will click on their *Program Participant File*. Recipients will see multiple "Correspondence" tables.



Figure 23: Correspondence Notification of Ownership Change

Recipients will select the corresponding

row with the RFI communication in the "Correspondence Notification of Ownership Changes" table to view specific details of the RFI (Figure 23). By clicking on the row containing the RFI communication, the specific details of the RFI will open, such as the Program Participant number, Status, Correspondence Type, and more. These greyed boxes cannot be edited by the Recipient. After scrolling down, Recipients will see the body of the correspondence and all communications history related to the RFI. Recipients may reply to the RFI if they have a question regarding the correspondence. Please note that a submitted Notification of Ownership Change will lock again once Recipients certify and submit, or if they do not make the requested changes in a timely manner. If no updates are required, Recipients will have the ability to type their reply message to provide clarifications.