

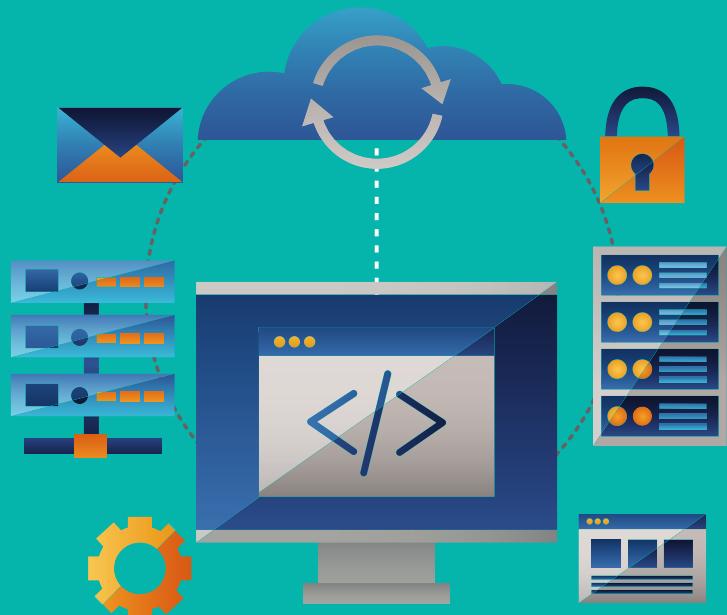


The Emergency Broadband Benefit Program: An Explainer for Nontraditional Providers

All providers should visit the [FCC's website](#) for updates.

The Emergency Broadband Benefit

**Provider applications submitted after
03.22.21 will be reviewed on a rolling basis.**



Who is eligible to be a participating provider?

Providers who are already designated as Eligible Telecommunications Carriers ("ETCs") are eligible to participate in the Emergency Broadband Benefit Program ("EBBP"). If a provider is not designated as an ETC, it must file an application with the Universal Service Administrative Company ("USAC") to participate.

Specifically, providers who are not ETCs must have provided broadband internet access service to end-users as of December 1, 2020. In its application, a provider should reference Form 477 data, demonstrating that it provided service as of December 1st if applicable. If a provider does not submit Form 477 data, it must show that it provided service through certification and document submission to USAC or the Federal Communications Commission ("FCC" or "Commission").

When will applications be accepted?

Now, Non-ETC provider priority applications and the alternative eligibility verification process portal opened on March 8th with a March 22nd deadline. The Provider Election Notice Inbox opened on March 11th. Applications received after March 22nd will be reviewed on a rolling basis.

A broadband provider that is not an ETC in the state or territory where it would like to participate must seek approval from the Commission. There are two primary ways in which a non-ETC can be approved to participate in the program, through automatic or expedited approval. Some applications will be reviewed on a rolling basis.

Which providers are eligible for automatic approval?

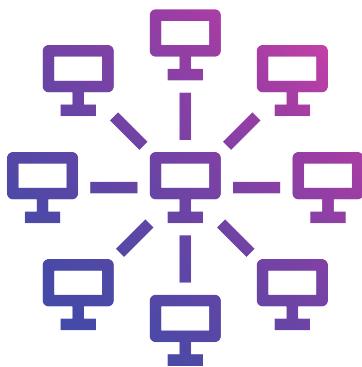
If a non-ETC provider demonstrates that (a) it has an established program as of April 1, 2020, (b) it is widely available, (c) offers Internet service offerings to eligible households, and (d) maintains verification processes sufficient to avoid waste, fraud, and abuse, that provider may be eligible for automatic approval. Non-ETC providers must file the following:



- The jurisdiction in which it plans to participate;
- The service areas in which the provider has the authority, if needed, to operate in each state, but has not been designated an eligible telecommunications carrier; and,
- A description, supported by documentation, of the established program with which the provider seeks to qualify for automatic admission to the EBB Program.
 - In order to show an established program the provider must show that its program is "widely established" by demonstrating the program is offered to subscribers in a substantial portion of the provider's service area in the jurisdiction for which it is seeking approval. The established program must also have been available by April 1, 2020 to subscribers meeting at least one of the criteria in the Consolidated Appropriations Act, div. N, tit. IX, § 904(a)(6).
 - The Commission notes that a principal consideration of automatic enrollment is whether eligible providers already offer subsidized or low cost offerings.
 - A provider seeking automatic enrollment must also explain the verification process used for the established programs. These verifications must show how it combats waste, fraud, and abuse. Providers should also describe how they have prevented ineligible subscribers from enrolling in their programs.



A provider may choose to use the national verifier. If it employs an alternate household eligibility verification process, it must submit documentation outlining the process to the Commission.



When does expedited approval apply?

Expedited approval may apply where the non-ETC provider without an established program demonstrates that it provided qualifying broadband service to eligible households as of December 1, 2020. Providers looking to apply for expedited application approval must submit the following:

- A list of states or territories where the provider will offer EBBP services;
- A statement identifying the jurisdiction in which the provider requires FCC approval and jurisdictions in which the provider is an existing ETC, if any; and,
- Certifications and documentation of the provider's plan to combat waste, fraud, and abuse.
 - A provider must certify that it will:
 - Confirm a household's eligibility for the program through the National Verifier or a Commission-approved alternate process;
 - Follow all enrollment requirements and obtain all certifications as required by the EBBP;
 - Interact with the necessary USAC systems, including the National Verifier, National Lifeline Accountability Database, and Representative Accountability Database, before submitting reimbursement claims;
 - Disenroll any household it has a reasonable basis to believe is no longer eligible to receive the benefit;
 - Comply with program document retention requirements; and
 - Agree to the Commission's enforcement and forfeiture authority.

Where can providers find additional information?

The Universal Service Administrative Company, the nonprofit organization that implements the FCC's universal service fund programs, hosted an introductory webinar on the Emergency Broadband Benefit. It provided an overview for service providers interested in participating in the EBBP including a review of USAC systems used to check eligibility, enroll consumers, and claim reimbursement. Find additional eligibility resources here.

