



The FCC Requires Incumbent LECs to File Voice Service Territory Maps

A Connected Nation Policy Brief

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The Federal Communications Commission (FCC) is now requiring incumbent local exchange carriers (incumbent LEC or ILEC) to file a detailed map of their voice telephony service areas, beginning next year. The FCC [Order](#) released on November 6, 2012, mandates that all incumbent LECs certify the boundaries of their voice telephone exchange and “study areas” and to file that information in an ESRI shapefile format, suitable for GIS mapping purposes.

The FCC is collecting this information directly as part of its ongoing efforts to transform the federal universal service system to directly support the deployment of networks that offer voice and broadband services. The FCC specifically notes that having current voice service area maps on hand “will assist us in implementing several components of these ongoing reforms.” It may come as a bit of a surprise that the FCC, despite nearly seventy years of regulating interstate telephone and long distance access services, does not have comprehensive maps of local telephone exchange boundaries and instead has relied upon commercial sources for this information. The FCC expects to use these maps to help it determine whether unsubsidized competitors offer voice and broadband service within these exchange and study areas.

Because it is tasked with mapping broadband service, the State Broadband Initiatives mapping grant program administered by Connected Nation in several states does not generally collect and map the voice telephone service area boundaries of incumbent LECs. However, the broadband information that Connected Nation has collected from these providers may facilitate the creation of these voice telephone area maps, and Connected Nation has the mapping tools and ability to generate voice service area maps for providers and states.

THE FILING REQUIREMENT AND TIMEFRAME

A voice telephone “study area” is the geographic area served by an incumbent LEC within a state and consists of one or more local telephone exchange. For purposes of the required data collection, the FCC defines a study area to be “the geographic area associated with a study area code as assigned and maintained by the National Exchange Carrier Association.” As noted above, these study areas reflect incumbent LEC service territory for traditional voice services, and not broadband.

Each incumbent LEC is now required to submit to the FCC an ESRI shapefile for each separate study area in each state served by the ILEC. The shapefile for each study area must depict each exchange within the study area as a closed, non-overlapping polygon. Each exchange-area polygon must constitute one record in the shapefile and must contain associated data with certain attributes used to identify the exchange, such as the exchange name and CLLI (Common Language Location Identifier) code. Exchange area information is required because as part of the FCC’s USF transformation, high cost support may be “frozen” in some exchanges within a study area but not others.

All incumbent LECs – even those in Alaska, where exchanges are frequently non-contiguous – are required to certify their study area boundaries to the FCC every two years. The FCC will announce the date of the first filing deadline after the Office of Management and Budget completes its review of the new filing requirement.



Thereafter, whenever study area boundaries change in a year, incumbent LECs are required to submit a new shapefile by March 15 of the following year. In addition, every two years, all incumbent LECs must re-certify their study area boundaries with a new filing. Study area boundaries can change frequently, as the result of a transaction involving the addition or sale of exchanges; new deployment into previously unserved areas, such as a new housing subdivision; or when an incumbent LEC relinquishes its ETC designation and is no longer the carrier of last resort in an area. The FCC stated that it will create a web portal for the submission and maintenance of these files.

The FCC stated that while the obligation to file is placed on all incumbent LECs, it will permit state agencies or associations to make the filing on behalf of service providers in those states.

Compliance with the new data submission rules is mandatory, and failure to comply may lead to enforcement action, including forfeiture penalties, pursuant to the Communications Act and other applicable law. The FCC will contact any ILEC that does not submit and certify study area boundary data in the format requested by the required date and request that the incumbent LEC submit the required shapefiles within 30 days.

OVERLAP WITH SBI MAPING PROGRAM

The new FCC voice telephone study area filing requirements are distinct from the data that Connected Nation collects pursuant to the State Broadband Initiative (SBI) mapping program. Under the SBI program, Connected Nation and other grantees collect and map broadband availability information, at multiple speed tiers and from all broadband providers, including incumbent LECs, cable operators, mobile providers, and any other competitive entrants. While broadband service boundaries for incumbent LECs may overlap with their voice telephony study area boundaries, the two areas are not necessarily congruent.

That said, the provider data collection and processing that Connected Nation has undertaken as part of the SBI grant program, as well as our extensive GIS mapping expertise, can be leveraged to support the preparation of ESRI shapefiles of study area boundaries meeting the FCC's requirements in a timely fashion.

For more information, please contact your Connected Nation mapping contact, or e-mail us directly at policy@connectednation.org.