

Overview of Regulatory Requirements For CUDs

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CUDs must comply with many complex federal and state requirements

- CUDs must meet many federal requirements in order to successfully apply for grants through a variety of programs (RDOF, ARPA, IIJA SRFRF, etc.). In addition, their activity is regulated by the FCC.
- CUDs are State municipalities and must comply with many State requirements as well

FCC Requirements

- Disclaimer
- Registration requirements – ISP, Municipal ISP
- Obtain the following accounts/numbers:
 - FCC login (federal communications filings)
 - SAM # (grant applications)
 - EIN # (federal tax)
 - DUNS # (corporate information)
 - USAC # (for ACP payments)

Make various quarterly and yearly filings (e.g. Form 475 and 499)

- Annual Form 499 (voice only)
- Form 477
- E 911
- ERATE, ESAC
- ETC
- Broadband mapping

Policy Requirements

- Requirements to Have and/or File Various Policies
 - Subscriber agreement
 - Privacy policy
 - Procedures for Customer Proprietary Network Information (CPNI)
 - Digital copyright (compliance with the Digital Millennium Copyright Act, or DMC)
 - Other customer-facing policies

State requirements

- Register with SoS when a municipality
 - Registering name with State
- Reporting requirements
 - Where the CUD is operating
 - How many customers it has
 - Speeds
 - VT Universal Service Fee
 - E-911