

C-band Handbook

Summary of Selected Changes Made to April 30, 2021 Draft C-band Handbook

On April 30, 2021, the Relocation payment Clearinghouse LLC (“RPC”) posted on its website a draft C-band Handbook and welcomed comments on it from program stakeholders and interested parties. The RPC has now published the C-band Handbook (Version 1.0). This is a summary, by section, of **selected** edits made since the posting of the draft C-band Handbook that are reflected in the C-band Handbook (Version 1.0). This is a summary only. It is not meant to be comprehensive or to take the place of the published C-band Handbook (Version 1.0).

§	Section Title	Modification to Draft Handbook
2	C-Band Relocation Stakeholders	<p><u>Section 2.2 – Overlay Licensees</u>: further description of cost allocation of funds received by the RPC from Overlay Licensees.</p> <p><u>Section 2.4 – Earth Station Operators</u>: addition of a paragraph regarding earth stations outside the contiguous United States.</p> <p><u>Section 2.7 – Programmers</u>: addition of the subsection.</p>
3	Compensable Relocation Costs	<p><u>Section 3 – Soft Costs</u>: Soft costs include engineering, consulting, attorney fees, costs of acquiring financing for clearing costs, costs of such financing, insurance costs, and FCC filing fees.</p> <p><u>Section 3.1 – Necessary Costs</u>: addition of language regarding the WTB’s Public Notice opening a new window for eligible SSOs to update their transition plans by July 7, 2021.</p> <p><u>Section 3.2 – Reasonable Costs</u>: transition plans are used as a baseline for assessing claims; conformance to the transition plan, by itself, does not establish a cost as presumptively reasonable.</p> <p><u>Section 3.3 – Actual Costs</u>:</p> <ul style="list-style-type: none"> - Evidence of full payment will be generally required unless the RPC, in consultation with the WTB or the FCC, indicates that evidence of incremental payment is appropriate in specific cases. - The RPC will reimburse costs associated with the purchase and installation in the field of spare equipment that is on standby in a manner consistent with accepted industry practice, and to the extent the claimant had similar kinds and quantities of spare equipment on location pre-transition.
4	Filing a Claim – General Points	<p><u>Section 4</u>: if a claimant challenges an RPC reimbursement decision that is not also the subject of an objection filed by an Overlay Licensee, the claimant’s sole recourse will be an appeal to the WTB.</p> <p><u>Section 4.1 – Coupa Setup</u>: The RPC provided additional guidance regarding the documentation required during the setup of a Coupa profile.</p>

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		<p><u>Section 4.3 – Claim Support Information and Documentation:</u></p> <ul style="list-style-type: none"> - Parties other than lump sum filers may claim reimbursement for cost items in a relevant category within any table in the Cost Catalog. - The Cost Catalog line items are set forth in Coupa for ease of reference.
5	Lump Sum Reimbursement	<p><u>Section 5:</u></p> <ul style="list-style-type: none"> - The lump sum amount for MVPD incumbent earth stations excludes the cost of compression equipment for technology upgrades, such equipment will be purchased by SSOs in cooperation with programmers. - Reimbursement for the costs of replacement or additional antennas for use by an ESO that made a lump sum election will not be approved. <p><u>Section 5.1 – Eligibility:</u></p> <ul style="list-style-type: none"> - The RPC may ask lump sum filers for any information missing from their lump sum election. - The RPC revised the reference to the updated eligibility lists of incumbent earth stations and lump sum filers to reflect the June 22, 2021 list issued by the IB). <p><u>Section 5.3 – Coupa Setup:</u></p> <ul style="list-style-type: none"> - The RPC detailed the source of email communications to lump sum filers; - The RPC provided additional guidance regarding the documentation required during the setup of a Coupa profile. <p><u>Section 5.4 – Claim Submission:</u></p> <ul style="list-style-type: none"> - When an ESO submits a lump sum reimbursement claim to the RPC, it should upload in Coupa the lump sum election that was filed with the FCC as well as any correction or amendment filed with the FCC. - Claimants may submit multiple claim filings simultaneously through Coupa. - In the majority of cases, the RPC’s examination of lump sum reimbursement claims will be narrowly focused and the RPC will request additional information on a case-by-case basis to verify the information certified in a lump sum election. - The RPC may make limited adjustments to a reimbursement claim to correct an error in a lump sum election.
7	Claim Reimbursements	<p><u>Section 7.1 – Reimbursement of Relocation Costs:</u> The RPC will contemporaneously provide the claimants with the information provided to the Overlay Licensees regarding their respective claims.</p>
8	Accelerated Relocation Payments	<p>The WTB will prescribe the form of any challenges by relevant stakeholders as to the validity of the certification and will establish the process for how such challenges will impact the incremental decreases in the accelerated relocation payment.</p>

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9	Overlay Licensees	<p><u>Section 9.1 – Billing Overlay Licensees and Record Keeping for Relocation Costs:</u></p> <ul style="list-style-type: none"> - The first Billing Statement will include the Overlay Licensee’s <i>pro rata</i> share of all actual C-band relocation costs incurred prior to the auction, including estimated costs for lump sum payments, as well as estimated costs for the first six months of the transition following the auction. - Following the initial round of Overlay Licensee funding, the RPC will synchronize the funding process across Overlay Licensees. - The RPC will contemporaneously provide the claimants with the information provided to the Overlay Licensees regarding their respective claims. <p><u>Section 9.2 – Funds Collected from Overlay Licensees for Relocation Costs:</u> The RPC will reduce amounts billed to Overlay Licensees to account for interest income and U.S. Treasury securities income and/or gains generated by the Overlay Licensees’ respective payments.</p>
10	Dispute Resolution	<p>If a claimant challenges an RPC reimbursement decision that is not also the subject of an objection filed by an Overlay Licensee, the claimant’s sole recourse will be an appeal to the WTB.</p>
11	Fraud, Waste, and Abuse	<p>The RPC will not approve claims where it suspects fraud.</p> <p><u>Section 11.1 – Obligations:</u> The RPC will report to the FCC all evidence and/or each allegation of suspected fraud, waste, or abuse related to the C-band relocation program along with an initial assessment of the credibility and substantiality of any such allegation.</p> <p><u>Section 11.3 – The RPC’s Safeguards:</u> The RPC will not approve claims where it suspects fraud.</p>
	Appendix	<p>The RPC developed tables for each category of claimant, which describe the information always required and the information required upon request of the RPC.</p>