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### January 2, 2018 HIGHLIGHTS

- The FCC [announced](#) the release of the final [list of census blocks](#) eligible for the CAF Phase II auction, a list of the [census block groups](#) and associated reserve prices, and [a map](#) showing the eligible blocks within the census block groups. [News Release](#).
- The FCC [provided](#) further requirements for the handsets that mobile wireless providers in the Mobility Fund Phase II challenge process must designate for challengers to use when conducting speed tests in areas deemed presumptively ineligible for MF-II support.
- NTCA and WTA [submitted](#) an updated version of their proposal for a rule delineating the kinds of capital investment and operating expenses that would not be considered eligible for recovery via regulated interstate rates, CAF BLS support, or HCLS support.
- ERTA [urged](#) additional USF funding for both RoR and A-CAM companies. RoR ILECs from [Nebraska](#), [Iowa](#) and [Arkansas](#) urged the FCC to take immediate steps to remedy shortfalls in the High-Cost USF fund. Two Pennsylvania PUC Commissioners [supported](#) full funding for A-CAM carriers as long as it does not adversely affect needs of the legacy carriers. [Arkansas Governor Asa Hutchinson](#) and the [Arkansas Economic Development Commission](#), [Michigan PSC Commissioners](#), the [Arizona Corporation Commission](#), [Alabama PSC Commissioners](#), [New Hampshire PUC Chairman](#), and the [Minnesota Office of Broadband Development](#) urged the FCC to make additional A-CAM funding available before year-end.
- The [Order](#) on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes [is effective](#) January 29, 2018, except for the amendments to certain sections, such as 51.325, 51.329, 51.332, and 51.333, which require approval from the OMB. Comments on the accompanying [FNPRM](#) are due January 17, 2018; replies due February 16, 2018.
- [Comments were filed](#) on the [NPRM and NOI](#) on the regulatory and technological changes that would be required to implement complete nationwide number portability between all service providers. Replies are due January 26, 2018.
- The Tenth Circuit Court [denied](#) Blanca Telephone's [Petition for Stay](#) pending court review of its [Petition](#) for a writ of mandamus of the FCC's [Order](#) that directed Blanca to repay \$6,748,280 in USF support. Blanca's mandamus petition remains under consideration.
- The Wireline Competition Bureau issued an [Order and Erratum](#) partially granting Sandwich Isles Communications' [Motion](#) seeking to revise the [Protective Order](#) used in USAC's investigation of SIC's receipt of USF support and related proceedings.
- The FCC [announced](#) the appointment of six members to the USAC Board of Directors.
- PRA comments [are due](#) February 1, 2018, on the rural call completion information collection.

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### Other Key Upcoming Dates

- Jan. 3 - Replies [due](#) on Champaign Telephone's [Petition for Waiver](#) of the requirement that "investments once allocated to nonregulated use may not be reallocated to regulated use," consistent with the waiver process contemplated at that time.
- Jan. 4 - [Due date](#) for the filing of 4G LTE coverage data pursuant to the Mobility Fund II Challenge Process Order.
- Jan. 11 - PRA comments [due](#) on a new information collection to file geo-coded location information demonstrating high-cost recipients meet their broadband deployment obligations via an electronic portal established by USAC.

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## USF Reform

- The FCC released a [Public Notice](#) on December 19, 2017, announcing the release of the final [list of census blocks](#) eligible for the CAF Phase II auction, a list of the [census block groups](#) and associated reserve prices, and [a map](#) showing the eligible blocks within the census block groups. The Bureau is publishing the final list of eligible census blocks, based on the most recent publicly available FCC Form 477 data (as of December 31, 2016), at least three months prior to the deadline for submission of short-form applications for the Phase II auction. [News Release](#).
- The Rural Broadband Auctions Task Force, in conjunction with the Wireline Competition and Wireless Telecommunications Bureaus, issued a [Public Notice](#) on December 20, 2017, providing further requirements for the handsets that mobile wireless providers in the Mobility Fund Phase II challenge process must designate for challengers to use when conducting speed tests in areas deemed presumptively ineligible for MF-II support. They also adopted procedures for challengers to request access to USAC's challenge process portal.
- NTCA and WTA filed a [letter](#) on December 20, 2017, to submit an updated version of their proposal for a rule delineating the kinds of capital investment and operating expenses that would not be considered eligible for recovery via regulated interstate rates, CAF BLS support, or HCLS support. They said the proposal is intended to meet the need for greater near-term certainty regarding whether and to what degree certain expenses are recoverable via high-cost USF support, and builds upon many accountability measures that already apply to the business of smaller operators, including a capped overall USF support budget, a separate, annually declining cap for the HCLS program, capital investment limits, overall OpEx limits, separate corporate OpEx limits, network buildout obligations, etc. They said the proposal would provide substantial assurance for the proper use of USF resources and urged the Commission to adopt the proposal.
- ERTA [spoke with](#) Commissioner Clyburn's Legal Advisor on December 15, 2017, to urge additional USF funding for both RoR and A-CAM companies to provide broadband to more unserved areas. ERTA said USAC should be instructed to continue collecting the budgeted \$4.5 billion for high-cost USF after this year as well as the use of reserves for additional RoR and A-CAM funding.
- Sixteen RoR RLECs from Nebraska filed a [letter](#) on December 15, 2017, to urge the Commission to take immediate steps to remedy shortfalls in the high-cost USF that are resulting in reduced network investments, lower broadband speeds and higher consumer prices in rural America. They suggested: using the remaining CAF reserves to help fill the shortfall in the cost-based USF programs; continuing to collect at least \$4.5 billion consistent with the current overall high-cost USF budget; using any amounts that may be in excess of that total to assist in funding the shortfall in the cost-based USF mechanisms; and seeking comment on ways to address the budget shortfalls going forward for both cost-based mechanisms and the model-based support mechanism. A similar letter was filed by [Iowa RoR ILECs](#) on December 26, 2017, and by [Arkansas RoR ILECs](#) on December 27, 2017.
- Two Pennsylvania PUC Commissioners filed a [letter](#) on December 21, 2017, to express support for full funding for universal voice and broadband deployment and full funding for the revised offers for A-CAM carriers. They said if revised funding is allowed by the FCC, the \$129 million shortfall for A-CAM carriers should be covered in a way that does not adversely affect needs of the legacy carriers. They also expressed support for resolution of the related federal USF contribution base and assessment methodology issues.
- Arkansas Governor Asa Hutchinson filed a [letter](#) on December 21, 2017, to urge the Commission to make additional A-CAM funding available before year-end so that the promise of broadband expansion, contained in the Commission's original decision to provide A-CAM funding for up to \$200/month per eligible location, can be realized. A similar [letter](#) was filed by the Arkansas Economic Development Commission on December 12, 2017.
- The Michigan PSC Commissioners sent a [letter](#) to Chairman Pai on December 20, 2017, to urge the FCC to approve full funding by the end of this year for the rural companies that elected to receive A-

CAM USF support. The [Arizona Corporation Commission](#) and the [Minnesota Office of Broadband Development](#) sent similar letters on December 18 and 19, 2017.

- The Alabama PSC send [letters](#) to Chairman Pai from each Alabama PSC Commissioner on December 19, 2017, expressing support for the Alabama A-CAM companies' December 1, 2017 request for approval of additional A-CAM funding prior to year-end.
- The Chairman of the [New Hampshire PUC](#) sent a letter to Chairman Pai on December 28, 2017, urging the Commission to approve full funding by the end of the year for the rural companies that elected A-CAM support. He also recommended the FCC expeditiously evaluate additional USF funding for the balance of New Hampshire rural customers so they too will have the benefit of adequate broadband service.
- NECA filed redacted rate-of-return carrier [rate floor data](#) on December 29, 2017, at the rate zone level as of December 1, 2017, for carriers reporting changes during the voluntary mid-year collection.
- Midwest Energy & Communications, NTCA, the National Rural Electric Cooperative Association, Utilities Technology Council, Jackson County Rural Electric Membership Corporation, North Arkansas Electric Cooperative, and Co-Mo Electric Cooperative [met with](#) the Rural Broadband Auctions Task Force, Wireless Telecommunications and Wireline Competition Bureau staff, and Chairman Pai's Legal Advisor on December 18, 2017, to reiterate the Commission should take reasonable steps to ensure all bidders can meet their applicable speed and latency tiers before participating in the CAF Phase II Auction. They also encouraged the Commission to require all providers to submit network maps showing coverage and propagation with their short-form applications and to make every effort to simplify the CAF Phase II auction and eliminate package bidding.
- Hughes Network Services [met with](#) Commissioner Carr's Legal Advisor on December 19, 2017, to discuss its Petition for Reconsideration of the CAF Phase II bidding rules, arguing the Commission should modify the bid-weighting matrix to align weights with the values that consumers place on speed, capacity and latency. Hughes also said if the Commission modifies the auction framework, it should add time-to-deployment to the bid weighting matrix.
- Hughes Network Services filed a [letter](#) on December 19, 2017, urging the Commission to adopt an off-peak testing requirement for CAF Phase II support recipients, arguing peak usage testing may lead to significant congestion because of the performance testing itself. Hughes also urged the Commission to allow ETCs the flexibility to determine the appropriate testing methodology to verify network performance.
- Reps. Tom O'Halloran (D-Ariz.) and David Schweikert (R-Ariz.) sent a [letter](#) to Chairman Pai on December 18, 2017, to urge the Commission to take whatever action may be necessary to provide relief to companies primarily serving Tribal lands from the effects of the FCC's operating expense limitation rule, retroactive to January 1, 2017, and asked that this be completed before the end of 2017. They also suggested the Commission look more broadly at opportunities to solve the challenge of broadband deployment on tribal lands, and urged him to adopt measures to close the digital divide on Tribal Lands.
- The National Tribal Telecommunications Association and Mescalero Apache Telecommunications [met separately with](#) Advisors to Commissioners Rosenworcel and Clyburn on December 20, 2017, to discuss the need for operational expense relief for some tribal telecommunications companies. They said in Mescalero Apache Telecommunications' case, financial forecasts show the company will be cash flow negative at the end of 2019 unless immediate steps are taken to provide relief. They claimed this is a result of the budget control mechanism coupled with the necessary expenses incurred by the operation of an ILEC serving on tribal lands.
- The chairwoman of the Puerto Rico Telecommunications Regulatory Board sent a [letter](#) to Chairman Pai on December 20, 2017, to state it is necessary for Puerto Rico to have a more resilient and redundant telecommunications service driven by different kinds of technology. The TRB claimed Puerto Rico is deserving of a new high-cost support mechanism that provides significant incentives to

further network build-out similar to the specific high-cost funding mechanisms for other rural high cost areas available for tribal lands and Alaska.

- U.S. Cellular [met with](#) Legal Advisors to Commissioners Clyburn, Carr, and Rosenworcel on December 18, 2017, to discuss the Mobility Fund II challenge process. It agreed that 150 days is sufficient time within which to develop data and file a challenge, but suggested the 150-day window not open until approximately May 1, 2018, to avoid having most of the challenge period occur during winter. It also claimed thirty days is an insufficient period to respond to a challenge, particularly for smaller providers, and said rather than have companies file waiver requests when they cannot complete the rebuttal process within thirty days, the Commission should extend the rebuttal window to 60 days.

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## Open Internet

- Commissioner Clyburn released a [document](#) on December 21, 2017, entitled *What Happens Next with Net Neutrality?*, in which she outlined how the repeal of Open Internet rules will effect consumers and small businesses. She discussed online protections that will be lost, including prohibitions on blocking of lawful content, throttling, and paid prioritization. She also discussed what protections will exist after the repeal goes into effect, including that broadband providers will only be required to provide limited transparency to consumers about the service they receive.
- Rep. Marsha Blackburn (R-Tenn.) introduced [a bill](#) entitled the *Open Internet Preservation Act*, which would amend the Communications Act of 1934 to ensure internet openness, to prohibit blocking of lawful content, applications, services, and nonharmful devices, and to prohibit impairment or degradation of lawful internet traffic. The bill also proposes to limit the authority of the FCC, to preempt State law with respect to internet openness obligations, and to provide that broadband internet access service shall be considered to be an information service. Commissioner O’Rielly issued a [statement](#).

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## ICC

- Inteliquent filed a [letter](#) on December 21, 2017, on 8YY charges. It provided data points on current national averages, as determined by an 8YY model it has developed, and described two alternative proposals it claimed will prevent 8YY-related abuses. Inteliquent asserted its 8YY model provides a reliable basis for calculating national rates because it owns and operates a national tandem network across 49 states and Puerto Rico.
- Philip Macres, Counsel for Consolidated and Peerless, filed [a letter](#) on December 20, 2017, to address various off-the-record assertions attributed to T-Mobile by West Telecom Services in its December 14, 2017 [letter](#). He said T-Mobile’s purported off-the-record representation that it does not receive compensation for traffic routed via an intermediate carrier appears to be at odds with the 2015 T-Mobile/Inteliquent Agreement and is controverted in on-the-record filings by several carriers. He invited T-Mobile to directly present its position on the record, and said upon review of the record as it stands, he finds nothing “inaccurate” or “misleading” about the Example 1 Diagram in Consolidated and Peerless’ December 4, 2017 [ex parte](#) that T-Mobile has indirectly called into question.

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## Broadband

- The FCC published in the [Federal Register](#) on December 27, 2017, the [Report and Order](#) on changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. The Report and Order is effective January 29, 2018, except for the amendments to sections 1.1424, 51.325, 51.329, 51.332, 51.333, 63.60, and 63.71, which require approval from the OMB. The accompanying [FNPRM](#) was also published in the Federal Register and seeks comment on expediting applications that grandfather additional data services for existing customers and further streamlining of the section 214(a) discontinuance process for legacy voice services, among other things. Comments are due January 17, 2018; replies are due February 16, 2018.
- The FCC [published](#) in the Federal Register on January 2, 2018, a [Second Report and Order, Order on Reconsideration, and MO&O](#) on spectrum bands above 24 GHz. The Order is effective February 1, 2018, except for section 25.136, which contains information collection requirements that are not effective until approved by the Office of Management and Budget. The accompanying [FNPRM](#) was also published in the Federal Register. Comments are due January 23, 2018; replies are due February 22, 2018.
- Verizon [met with](#) Commissioner Carr and his Legal Advisor on December 19, 2017, to discuss how the Commission can pave the way for enhanced 4G and 5G networks by removing impediments to wireless facility siting. Verizon suggested the Commission clarify that sections 253 and 332(c)(7) of the Communications Act bar state or local actions that erect substantial barriers to wireless facilities deployment, and that fees for access to rights-of-way and municipal poles that exceed cost violate sections 253(a) and (c). Verizon also asked the Commission to adopt a 60-day shot clock for acting on small cell applications.
- Smart Communities and the Special Districts Coalition sent [a letter](#) to Elizabeth Bowles, Chair of the FCC's Broadband Deployment Advisory Committee, on December 20, 2017, asserting there is little or no acknowledgement, consideration, or analysis of the substantive legal and economic issues they presented in their comments in the two infrastructure deployment proceedings in any BDAC work product thus far. They expressed hope this will not be the case with respect to the BDAC's final work product following the January meeting. They said a BDAC proposal that calls for Commission actions for which it lacks legal authority, or a proposal that calls on the Commission to gloss over the engineering and economic challenges posed by deployments within the rights-of-way, will result in litigation, not the accelerated deployment of broadband services.
- INCOMPAS filed a [letter](#) on December 20, 2017, to encourage the Commission to move expeditiously to adopt a one-touch make-ready process and to address other barriers to pole attachments. INCOMPAS said the current rules are not only ineffective in hastening the process for pole attachments and ultimately network deployment, they impede certain municipalities from adopting rules to improve the process. INCOMPAS also recommended the Commission seek comment on ways to streamline the pole reinforcement process.

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## Call Completion

- The FCC published a [Notice](#) in the Federal Register on January 2, 2018, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with Form 480, Rural Call Completion Recordkeeping and Reporting Requirements. The FCC estimated approximately 60 wireline, wireless, and wholesale providers will be required to file an electronic report with the FCC, and said the number of providers this estimate replaces, 225, was also an approximation. PRA comments are due February 1, 2018.

## Universal Service

- The FCC issued a [Public Notice](#) on December 20, 2017, announcing the appointment of six members to the USAC Board of Directors. The new members are: Joan H. Wade, Ed.D., Executive Director, Association of Educational Service Agencies, representing schools that are eligible for E-rate discounts; Ellis Jacobs, Senior Attorney, Advocates for Basic Legal Equality, representing low-income consumers; Joseph Gillan, Consultant, Gillan Associates, representing competitive LECs; Katharine Hsu Wibberly, Ph.D., Executive Director, Mid-Atlantic Telehealth Resource Center, representing rural health care providers that are eligible for support from the RHP; Geoffrey A. Feiss, General Manager, Montana Telecommunications Association, representing non-BOC ILECs with \$40 million or less in annual revenues; and Atilla Tinic, Senior Vice President, Enterprise Business Support Systems and International IT, CenturyLink, representing IXCs with annual operating revenues of \$3 billion or less. Chairman Pai sent a [letter](#) to outgoing Chairman Dr. Brian L. Talbott thanking him for his service on the USAC Board.
- The Tenth Circuit Court issued an [Order](#) on December 28, 2017, denying Blanca Telephone's [Petition for Stay](#) pending court review of its [Petition](#) for a writ of mandamus of the FCC's [Memorandum Opinion and Order and Order on Reconsideration](#) that directed Blanca to repay \$6,748,280 in USF support. Blanca's mandamus petition remains under court consideration. The FCC filed an [Opposition](#) to the stay request on December 27, 2017, claiming Blanca's request for a judicial stay is both procedurally defective and barred by section 405(a) as Blanca now seeks a judicial stay on grounds it never presented to the agency.
- The Wireline Competition Bureau issued a [Memorandum Opinion and Order and Erratum](#) on December 28, 2017, partially granting Sandwich Isles Communications' [Motion](#) seeking to revise the [Protective Order](#) that adopted procedures to provide parties limited access to proprietary or confidential information regarding USAC's investigation of SIC's receipt of USF support and related proceedings. The Bureau also dismissed SIC's [Objection](#) to the disclosure of any information filed by SIC with USAC or the Commission relating to the USAC audit to any third-party until SIC's [Motion](#) is adjudicated. The Bureau asserted that while the overall intent of the Protective Order is clear, it corrected five drafting errors in the Protective Order to harmonize the language used throughout to describe the proceedings covered by the Protective Order.
- The FCC [announced](#) on December 29, 2017, it settled investigations of five providers ([Telrite](#), [i-wireless](#), [Stand-Up Wireless](#), [Easy Wireless](#), [Cintex Wireless](#)) that received improper payments from the FCC's Lifeline program. The FCC said that since the companies have already repaid the program for improper payments, the public interest would be served by adopting the Consent Decrees, which resolve the Notice of Apparent Liability for Forfeitures issued to the companies. The FCC indicated the companies agreed to make additional payments to the U.S. Treasury and to implement compliance plans to ensure future adherence to program rules. Commissioner Clyburn issued a [statement](#).
- The Wireline Competition Bureau released an [Order](#) on December 18, 2017, granting a limited waiver to ETCs impacted by the delay of the launch of the National Lifeline Eligibility Verifier. The Bureau temporarily waived the Lifeline Program's recertification rules in Colorado, Montana, Mississippi, New Mexico, Utah and Wyoming from January 1, 2018, through the date of the soft launch of the National Verifier for subscribers whose recertification deadlines or anniversary dates would otherwise fall during that time frame.
- The Wireline Competition Bureau released an [Order](#) on December 18, 2017, granting in part the Michigan Public Service Commission's [request](#) to extend an existing waiver giving Michigan additional time to implement the Lifeline federal eligibility program changes in sections 54.400(j) and 54.409(a). The Bureau extended the waiver through the earlier of June 30, 2018, or the date on which Michigan has aligned its eligibility criteria with the Commission's Lifeline eligibility rules and updated its eligibility database accordingly.

- The Enforcement Bureau released a [Forfeiture Order](#) on December 19, 2017, to impose a penalty against UnityComm for failing to timely file Telecommunications Reporting Worksheets with USAC. In the UnityComm [NAL](#), the Bureau found UnityComm's failure to timely file Worksheets allowed the company to avoid making full payments to important federal programs, which gave it an unfair economic advantage over competing companies that complied with the rules. The Bureau also said the company has not responded to the NAL, and they are assessing the \$100,000 forfeiture the Bureau previously proposed.
- The Wireline Competition Bureau released a [Public Notice](#) on December 29, 2017, granting, denying, and dismissing various petitions related to actions taken by USAC on the E-rate program. Petitions for reconsideration or applications for review of these decisions must be filed within 30 days of the Public Notice.
- AT&T Michigan filed a [letter](#) on December 15, 2017, to express support for the Michigan PSC's [request](#) for an extension of its Lifeline waiver. AT&T Michigan said it agrees the Michigan Telecommunications Act establishes state eligibility criteria that are different from federal eligibility criteria, and that changes to state law are needed to bring the state criteria in line with the new federal eligibility criteria.
- The California PUC filed a [Supplement](#) on December 21, 2017, to its [Petition](#) seeking a temporary waiver of the Commission's Lifeline recertification and non-usage rules for subscribers affected by the recent California wildfires. The PUC said the supplement adds four additional counties to the waiver request.
- California PUC Commissioner Martha Guzman Aceves [spoke with](#) Commissioner Clyburn and her Legal Advisors on December 21, 2017, to discuss the grant of the CPUC's request for extension of time to comply with revised federal Lifeline eligibility changes. Commissioner Guzman Aceves said the PUC is interested in extending the implementation due date beyond April 30, 2018.
- Sprint filed a [Petition for Reconsideration](#) on December 27, 2017, of the Wireline Competition Bureau's Orders that provided additional time for the [New York PSC](#) and [Michigan PSC](#) to implement certain Lifeline federal eligibility program changes. Sprint seeks reconsideration of a provision in the Orders that holds ETCs responsible for eligibility determinations of New York and Michigan Lifeline applicants and for recertification of Lifeline subscribers in the event that the state databases are not updated to comply with federal eligibility rules by April 30, 2018 (NY), and June 30, 2018 (Michigan). Sprint claimed the FCC's mandated shift of the compliance burden onto ETCs should New York or Michigan be unable to meet their respective deadlines is unreasonable and was imposed without any opportunity for comment.
- Medicine Park Telephone Company filed a [letter](#) on December 19, 2017, to update information it previously provided on its study area waiver [Petition](#) and the impact of the waiver on the USF and the NECA pool for special access services. It said grant of the Petition will have a de minimus impact on the USF, related primarily to operations expenses because the buildout of facilities to serve the area is subject to grant funding and grant funding requirements.
- TracFone Wireless [met with](#) Chairman Pai's Legal Advisor on December 18, 2017, to discuss the Commission's proposal to eliminate wireless resellers from participation in the Lifeline program. TracFone discussed the merits of the Commission taking into account a carrier's overall business model, including whether it relies on services other than those supported by the federal USF to generate revenue, as a factor in evaluating eligibility for participation in the Lifeline program.
- Telrite [met with](#) Chairman Pai on December 20, 2017, to discuss the Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#). Telrite supported the decision to implement a National Verifier and asked the Commission to allow time for it to take effect before making any changes to the status of resellers in the Lifeline program. Telrite claimed the proposal to eliminate resellers from the Lifeline program goes too far and may drop over 7 million subscribers. Telrite also discussed port freezes, and said subscribers would benefit if they were required to stay with providers longer, asserting frequent switching increases costs for verification and certification of subscribers, encourages fraud, and can be wasteful.

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## Misc.

- The FCC released the following items that were adopted at the December 14, 2017 Open Meeting: the Rural Healthcare Program [NPRM and Order](#); and the National Television Ownership Cap [NPRM](#).
- Comments were filed on December 27, 2017, on the [NPRM and NOI](#) on the regulatory and technological changes that would be required to implement complete nationwide number portability between all service providers. [WTA](#) said if the FCC proceeds with nationwide number portability, it should start with the wireless sector and wait to address nationwide wireline number portability until the FCC has resolved any problems of implementing nationwide wireless portability and until the transition from TDM to more portability-compatible VoIP services proceeds further. WTA opposed the commercial agreements option, and opposed elimination of the existing N-1 query requirement until the Commission fully considers the benefits and costs of nationwide wireline number portability. [NTCA](#) said any consideration of how to enable carriers to offer NNP functionality should guard against the inadvertent misrouting of calls and should place the financial and logistical responsibility for providing the service on those carriers marketing and offering that functionality to end-users. NTCA also asserted commercial agreements offer the FCC and carriers an expeditious and straightforward path toward enabling the immediate implementation of NNP functionality. [USTelecom](#) suggested the Commission not implement any new requirements that would require modification of legacy equipment, and suggested instead the Commission move forward with implementing and completing the IP transition so that all benefits of NNP can be realized within that evolution. [ITTA](#) claimed the costs of implementing NNP will far surpass the benefits and do more harm than good for small carriers. ITTA said if NNP is to be implemented, such implementation must be achieved through commercial agreements. ITTA also said while the FCC should sunset its dialing parity rules regardless of whether it implements NNP, it should keep the N-1 query requirement in place, at least until NNP is implemented. [AT&T](#) said the Commission should avoid a gradual or service-specific transition to NNP, and asserted implementing NNP across all providers simultaneously would be more efficient and decrease customer confusion. [Verizon](#) asserted eliminating the N-1 query and IXC dialing parity rules would help facilitate more efficient longer-term call routing arrangements, and claimed commercial agreements can continue to meet service provider demand for location portability without the need to impose costly and burdensome upgrades across all service providers' legacy networks. [CenturyLink](#) asserted requiring providers to modify legacy TDM networks to accommodate NNP would be a monumental undertaking, and suggested the Commission pursue moving towards NNP in a measured way using commercial agreements while also promoting the transition from legacy to advanced networks. Replies are due January 26, 2018. [All comments available to date](#). [Federal Register](#)
- The Wireline Competition Bureau issued a [Public Notice](#) on December 18, 2017, to announce as of December 31, 2017, all data and work product stored in virtual lockers in the secure data enclave used by authorized parties for accessing and analyzing highly confidential data filed in the business data services proceeding will be saved and archived pending judicial review of the Business Data Services Order.
- Replies were filed on December 19, 2017, on the voluntary remand by the [D.C. Circuit Court](#) of the FCC's Tariff Investigation [Order](#) that found certain provisions in tariffed pricing plans for business data services offered by AT&T, CenturyLink, Frontier and Verizon were unlawful. [Verizon](#) said Windstream, et al. provided no new arguments in their comments and repeated their arguments against Verizon's current, deemed lawful, tariffed discount plans. Verizon said the Commission should ignore the comments, reverse its findings in the Tariff Investigation Order and find the plans then under review were lawful. [AT&T](#) also said Windstream, et al.'s arguments are not correct, and the Commission should reverse the Order and dismiss the underlying complaints. [Windstream, et al.](#) said the Commission should reaffirm and extend the remedies adopted in the Order and reiterated the Bellsouth decision does not support reversing the Order. They said the Commission's conclusions in the BDS [Order](#) support extending, rather than undermining, remedies adopted in the Order. [Public Notice](#)



- NECA filed its [2018 Modification of Average Schedules](#) on December 21, 2017, that contains proposed revisions to formulas used for average schedule interstate settlement disbursements. The revisions are proposed to become effective for a one-year period beginning on July 1, 2018.
- CTIA, AT&T, Sprint, T-Mobile, and Verizon [met with](#) Consumer and Governmental Affairs Bureau, Enforcement Bureau, and Wireline Competition Bureau staff on December 21, 2017, to discuss robocalls. They explained their support for a voluntary call-blocking framework with safe harbor protections and continued innovation to stop robocalls. They also discussed their support for call authentication to combat illegal robocalls, and asked the FCC to support industry work and encourage widespread adoption of call authentication protocols at home and abroad. They also claimed a new reassigned number database would be complex and of limited utility.
- First Orion, dba Privacy Star, [met separately with](#) Commissioner O'Rielly and his Advisors and Advisors to Commissioners Clyburn, Carr and Rosenworcel on December 18, 2017, to discuss how empowering consumers with additional information about individual calls is an effective tool in protecting consumers from illegal and unwanted robocalls. It suggested avoiding regulatory requirements that would impede the use of call identification and call blocking technologies in the name of decreasing false positives. It suggested the Commission not require industry to enable indicator tones for call originators to know when calls are being blocked, and should encourage any company engaged in call tagging or blocking to provide an effective remediation process for call originators. It also encouraged the Commission to allow the industry to address reporting that measures both the effectiveness of tagging and blocking services but also customer satisfaction.
- Danal [met with](#) staff from the Telecommunications Consumer Division on December 14, 2017, to discuss robocalls. Danal claimed its TCPA compliance solution has an established reassignment phone number database, which is commercially available and is a utilized service in the marketplace today. It said it is one of the few authorized service providers approved to utilize Mobile Number Operator data, asserting MNO data provides the most accurate information on who owns a given phone number. Danal proposed the idea of an FCC-certified TCPA compliance solution that is able to identify reassignments proactively, suggesting this would help companies select the best compliance solution for greater conformity to TCPA rules.
- The FCC released an [Order](#) on December 18, 2017, amending section 1.11051, which sets forth the application fee for petitions filed with the Wireline Competition Bureau, to reflect the closure of the post office box used for manual filings with WCB. The Bureau now will require the use of an electronic payment system and, wherever possible, electronic filing. The Order also amended rules in parts 0, 1, 51 and 61 to reflect these changes. The FCC said as a temporary transition measure, for 90 days after publication of this Order in the Federal Register, payments and paper filings to P.O. Box 979091 will continue to be processed by U.S. Bank, and after that date, payments for any WCB-related fee or service must be made in accordance with the procedures set forth on the Commission's [web site](#).
- The Consumer and Government Affairs Bureau issued [an Order](#) on December 29, 2017, extending, until June 30, 2021, a waiver previously granted to TracFone Wireless of the Commission's requirements to support text telephony technology over IP-based wireless services. The Bureau said it continues to be persuaded that TracFone, as a reseller of IP-based wireless services, is similarly situated to the underlying facilities-based wireless carriers for which it resells service, and that its ability to provide either TTY or RTT over wireless IP networks is limited by the extent to which solutions implemented by such carriers can support these technologies.
- Reply comments were filed December 18, 2017, on the [FNPRM](#) on: the appropriate tiers for calculating terrestrial and satellite international bearer circuit fees; the methodology for calculating cable TV subscribers in multiple dwelling units; and a regulatory fee for all holders of section 214 international authorizations. [AT&T](#) supported revising the IBC fee tiers for undersea cables to account for the substantial increases in submarine cable capacity since the current fee structure was adopted in 2009. It also supported adoption of a more competitively and technologically neutral fee structure for IBCs by applying the same revised fee tiers to terrestrial and satellite IBCs as well as submarine cable systems, and supported addressing potential adverse impacts on smaller providers by including lower fee tiers. The [Submarine Cable Coalition](#) supported adopting a flat fee for all holders of international section 214

authorizations, saying it provides an efficient and more equitable mechanism for assessing and collecting regulatory fees for international providers. [Public Notice](#)

- The North American Portability Management filed a [letter](#) on December 29, 2017, to provide a summary of the NAPM's status updates on the transition of the current LNPA, Neustar, to the new LNPA, Telcordia d/b/a/ iconectiv. NAPM said it will continue to file updates of this report with the FCC at the end of each month until the transition is complete.
- No comments were filed on RCLEC's application for authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)

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## Upcoming Filing Dates

- Jan. 3 - Replies due on Champaign Telephone Company's [Petition for Waiver](#) of the requirement that "investments once allocated to nonregulated use may not be reallocated to regulated use," consistent with the waiver process contemplated at that time. [Public Notice](#)
- Jan. 3 - Replies due on Venture Communications' Petition for Waiver of sections 51.909(a), 51.917(b)(1), and 51.917(b)(7) to implement its planned January 1, 2018 merger of two commonly-owned and merged study areas in the same state. [Public Notice](#)
- Jan. 4 - Due date for the filing of 4G LTE coverage data pursuant to the Mobility Fund II Challenge Process Order. [Public Notice](#)
- Jan. 8 - Comments due on Sprint's [Petition](#) for Reconsideration of a provision included in the [Order](#) that granted the California PUC's request for additional time to implement the federal streamlined Lifeline eligibility programs. Replies due January 23, 2018. [Public Notice](#)
- Jan. 8 - Comments due on the California PUC's [Petition](#) seeking a temporary waiver of Lifeline re-certification and non-usage rules for customers affected by the recent California wildfires. Replies are due January 23, 2018. [Public Notice](#)
- Jan. 10 - Replies due on Verizon's [Petition for Waiver](#) of rule 61.74(a) when one of Verizon's FCC tariffs references another. [Public Notice](#)
- Jan. 11 - PRA comments due on a new information collection pursuant to the requirement that certain carriers with USF high cost reporting obligations must file geo-coded location information demonstrating they meet their broadband deployment obligations via an electronic portal established by USAC. [Notice](#)
- Jan. 11 - PRA comments due on a new information collection related to the Mobility Fund II challenge process.
- Jan. 17 - Comments due on the [FNPRM](#) on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. Replies due February 16, 2018.
- Jan. 23 - Replies due on the California PUC's [Petition](#) seeking a temporary waiver of Lifeline re-certification and non-usage rules for customers affected by the recent California wildfires. [Public Notice](#)
- Jan. 23 - Comments due on potential mechanisms to ensure that erroneously blocked calls can be unblocked quickly and without harm to callers and consumers, and ways to measure the effectiveness of robocalling efforts. Replies are due February 22, 2018. [FNPRM](#)

- Jan. 23 - Comments due on the [FNPRM](#) on spectrum bands above 24 GHz. Replies are due February 22, 2018.
- Jan. 23 - Replies due on Sprint's [Petition](#) for Reconsideration of a provision included in the [Order](#) that granted the California PUC's request for additional time to implement the federal streamlined Lifeline eligibility programs. [Public Notice](#)
- Jan. 24 - Comments due on the NPRM and NOI portion of the Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM and NOI](#). Replies are due February 23, 2018.
- Jan. 26 - Replies due on the [NPRM and NOI](#) on the regulatory and technological changes that would be required to implement complete nationwide number portability between all service providers. [Federal Register](#)
- Feb. 1 - PRA comments due on an extension of a currently approved information collection associated with Form 480, Rural Call Completion Recordkeeping and Reporting Requirements. [Notice](#)
- Feb. 16 - Replies due on the [FNPRM](#) on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes.
- Feb. 22 - Replies due on potential mechanisms to ensure that erroneously blocked calls can be unblocked quickly and without harm to callers and consumers, and ways to measure the effectiveness of robocalling efforts. [FNPRM](#)
- Feb. 22 - Replies due on the [FNPRM](#) on spectrum bands above 24 GHz.
- Feb. 23 - Replies due on the NPRM and NOI portion of the Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM and NOI](#).

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