NECA’s Weekly Federal Regulatory Summary

January 27, 2020 HIGHLIGHTS

- The FCC issued the agenda for its January 30, 2020 Open Meeting. It will consider five items including a report and order that would adopt a two-phase reverse auction framework for the Rural Digital Opportunity Fund, committing $20.4 billion in high-cost universal service support to bring high-speed broadband service to unserved Americans.

- NTCA discussed the proposals in the draft Rural Digital Opportunity Fund order on the new 50/5 Mbps speed tier and transition support issues. USTelecom, AT&T, et al. discussed their concerns with the RDOF letter of credit obligations. CenturyLink, CoBank, NRECA, and NARUC also discussed LOC requirements.

- The Wireline Competition Bureau announced it updated a report showing the legacy support amounts associated with competitive ETCs offering service to fixed locations.

- The USDA announced it has invested $18.7 million for high-speed broadband in West Virginia and $7.1 million in Arkansas. The funding is through the USDA’s ReConnect Pilot Program. The USDA also announced it will begin taking applications on January 31, 2020 for the second round of $550 million in ReConnect Program loan and grant funding.

- PRA comments are due February 20, 2020, on a revision of a currently approved information collection associated with FCC Form 477, Local Telephone Competition and Broadband Reporting.

- The Congressional Budget Office estimated it would cost $52 million to implement the Broadband DATA Act, which would require the FCC to change the way broadband data is collected, verified, and reported.

- The Senate Committee on Commerce, Science, and Transportation held a hearing on 5G and obstacles to broadband deployment. Witnesses included: Commissioner Carr; NTCA; Public Knowledge; MillerCo; and the Fiber Broadband Association.

- Comments are due February 24, 2020, on technical requirements for the reassigned numbers database, which was established in the 2018 robocall order. Replies are due March 9, 2020.

- The FCC, AT&T and Sprint filed oppositions with the U.S. Court of Appeals for the D.C. Circuit to a motion for stay in the case reviewing the FCC’s access arbitrage order.

- The FCC filed a brief with the U.S. Court of Appeals for the D.C. Circuit in the case addressing petitions for review filed by Aureon and AT&T of several FCC orders on Aureon’s tariff.

- PRA comments are due March 23, 2020, on an extension of a currently approved information collection associated with Parts 54 and 69 filing requirements for regulation of interstate services of non-price cap ILECs and IXCs.

Other Key Upcoming Dates


Editor: Shawn O’Brien | Assistant Editor: Libby Newson
USF Reform

- NTCA and Premier Communications met with Chairman Pai’s rural broadband and legal advisors to Commissioners O’Rielly, Rosenworcel, and Carr on January 16, 2020, to discuss the draft Rural Digital Opportunity Fund order. NTCA expressed concern regarding the inclusion of a new 50/5 Mbps speed tier, but noted the significance of the clearing round provision included in the draft order to mitigate such concerns. NTCA urged the FCC to ensure this provision would remain in the order as proposed. They also discussed the circumstance in which a CAF Phase II support recipient far outperformed its prior 10/1 Mbps buildout obligations, deploying instead a network capable of potentially delivering 100 Mbps. They asserted in that case, under the draft order, that area will be considered ineligible for the RDOF auction. NTCA also spoke with Commissioner Starks’s legal advisor and Chairman Pai’s chief of staff and spoke with Chairman Pai’s rural broadband advisor on January 22, 2020, to discuss similar issues.

- USTelecom, AT&T, CenturyLink, Consolidated, Frontier, Verizon, and Windstream spoke with Wireline Competition Bureau, Office of Economics and Analytics, and General Counsel staff on January 17, 2020, to discuss the draft Rural Digital Opportunity Fund order. They discussed their concerns with the letter of credit obligations, claiming over $1 billion, or 6-7 percent of the total capital would go to banks, not to broadband. They suggested an alternative LOC proposal. CenturyLink, Consolidated, Frontier, Windstream, and USTelecom also met with Commissioners O’Rielly and Rosenworcel and their legal advisors on January 16, 2020, to discuss the letter of credit requirements.

- USTelecom, AT&T, CenturyLink, Consolidated, Frontier, Verizon, and Windstream spoke with Commissioner Pai’s rural broadband advisor, and legal advisors to Commissioners O’Rielly and Starks on January 16, 2020, to discuss their alternative RDOF letter of credit proposal. They also discussed transitional support and requested the Commission revisit the draft’s decision declining to provide support for continued service in the high-cost areas that are not won in the Phase I auction. They also asked the Commission to revisit the portion of the discussion on the section 214 discontinuance process. USTelecom, AT&T, CenturyLink, Consolidated, Frontier, and Verizon also spoke with legal advisors to Commissioners Carr and Rosenworcel on January 17, 2020, to discuss the same issues.

- CenturyLink spoke with Chairman Pai’s rural broadband advisor and Commissioner Starks’ legal advisor on January 21 and 22, 2020, to suggest the need for revisions to the letter of credit requirements contained in the draft RDOF order. It said the discussion was consistent with the letter of credit alternative proposal offered by USTelecom on January 20, 2020. CenturyLink also spoke with legal advisors to Commissioners Rosenworcel, Carr, and O’Rielly on January 22, 2020, regarding the same issues.

- Windstream filed a letter on January 23, 2020, to respond to Viasat suggesting the bidding weight assigned to high latency bids for the RDOF auction should be 25 points, not 40, as it was in the CAF Phase II auction. Windstream asserted rather than reduce the weight assigned to high latency bids, the Commission should increase that weight to 45 to better reflect the value of service quality to the rural Americans who will ultimately receive these services.

- NRECA, Roanoke Electric, and BARC Electric met with Preston Wise, Rural Broadband Advisor to Chairman Pai’s rural broadband advisor to discuss the draft Rural Digital Opportunity Fund order. NRECA expressed concern with the aspect of the draft order adding a 50/5 Mbps tier, stating that performance tier is already less than the median national download speed. They also asserted the letter of credit requirements in the current draft are both unduly onerous and disproportionate to the risk and suggested the Commission adopt the proposal submitted by USTelecom. NRECA also filed a letter on January 22, 2020, to express support for the proposal by USTelecom. NRECA, Roanoke Electric, Carolina Connect, and Rep. James Clyburn’s advisor discussed similar issues with Commissioner Starks and his advisor on January 23, 2020. NRECA, Roanoke Electric, BARC Electric and Carolina Connect met with Commissioner Carr and his advisor and with Commissioner O’Rielly’s advisor to discuss the same issues.
• NARUC filed a letter on January 22, 2020, to ask the Commission to revise the letter of credit requirement in the draft RDOF order. NARUC suggested the Commission could consider adopting lower LOC requirements that would still provide protections against default.

• CoBank filed a letter on January 22, 2020, urging modification of the LOC requirement and expressing support for the USTelecom proposal.

• LiveOak Bank filed a letter on January 23, 2020, to express concerns with the draft RDOF order’s letter of credit requirements.

• New Hampshire Governor Christopher T. Sununu sent a letter to Chairman Pai on January 22, 2020, to express concern with the proposed RDOF order, and its impact on the state of New Hampshire. He asserted the failure of bidders in the last FCC auction creates concern that a similar result may occur in the upcoming RDOF auction, putting at risk broadband deployment to 21,000 consumers in New Hampshire.

• Marybel Batjer, President of the California PUC, sent a letter to Chairman Pai on January 22, 2020, to express concerns with the draft RDOF order. She said it appears California would not have sufficient time to make necessary changes to existing statutes and program rules to achieve the goal of a federal-state partnership in Phase I. She asked the FCC to provide a more coordinated approach that ensures California receives the approximate $2.11 billion necessary for broadband investments. The California PUC also discussed similar issues with Commissioner O’Rielly’s legal advisor on January 16, 2020.

• INCOMPAS filed a letter on January 23, 2020, to express support for USTelecom’s modifications to the proposed letter of credit requirements that are contained in draft RDOF order. INCOMPAS said the draft LOC requirements may preclude the participation of some companies, especially smaller providers, because of the high direct and indirect costs of obtaining and maintaining letters of credit.

• NCTA filed a letter on January 23, 2020, to respond to USTelecom regarding letter of credit requirements and additional transition support for price cap carriers in the RDOF proceeding. NCTA supported the arguments made by USTelecom regarding the Commission’s proposed letter of credit requirements for RDOF participants, but opposed USTelecom’s request for the Commission to provide continued non-competitively bid CAF support to price cap carriers beyond the term of that support.

• The Fiber Broadband Association and Corning met with advisors to Chairman Pai, and Commissioners O’Rielly, Carr, Rosenworcel, and Starks on January 16, 2020, to discuss the draft RDOF order. They expressed support for the proposal to award support to the bidder offering the highest performance tier once the budget has cleared. They also discussed the costs and benefits of all-fiber deployments.

• WISPA spoke with Chairman Pai’s rural broadband advisor and Wireline Competition Bureau, Rural Broadband Auctions Task Force, and Office of Economics and Analytics staff on January 21, 2020, to discuss its concern with the proposal in draft RDOF order on the clearing round. WISPA said instead of adopting the new clearing round procedure, the Commission should permit all bidders to remain eligible in the auction until the total sum of the bids was 50 percent of the $16 billion budget. WISPA also met with Wireless Telecommunications Bureau, Rural Broadband Auctions Task Force, Office of Economics and Analytics, and General Counsel staff on January 17, 2020, to discuss the same issues.

• Viasat and Mehlman Capitol Strategies met with Commissioner Carr’s legal advisor on January 16, 2020, to discuss the draft Rural Digital Opportunity Fund order. Viasat discussed the Commission’s proposed weighting mechanism and suggested the Commission should enhance the competitiveness of the auction by ensuring entities can bid effectively using hybrid technologies.

• ViaSat met with Chairman Pai and and Commissioner O’Rielly and their advisors on January 17, 2020, to discuss the draft RDOF order. ViaSat suggested the Commission to keep an open mind as to the ability of hybrid technologies to meet the performance requirements of particular speed or latency tiers. It also urged the FCC to abandon its proposal to increase the latency penalty to 40 points for the RDOF auction.
• Viasat filed a letter on January 23, 2020, to respond to a paper by Economists Incorporated that USTelecom claimed shows the inefficiencies that high-latency bidders bring to the RDOF auction. Viasat asserted EI’s paper ignores record evidence, draws irrational and unsupported conclusions, and should be accorded no weight as the Commission finalizes its RDOF order.

• ADTRAN filed a letter on January 23, 2020, to urge the Commission not to alter its decision in the draft order to reject hybrid networks qualifying for the low-latency tier in Phase I of the RDOF where only a subset of the subscribers’ traffic meets the standards for low-latency.

• The North Dakota Joint Commenters filed an ex parte on January 23, 2020, responding to Midcontinent Communications reply comments on the RDOF.

• Parties filed letters on January 21 and 23, 2020, to request the FCC remove any categorical exclusions for New York projects and allow providers to participate in the RDOF in New York State. Letters were filed by the NY State Broadband Program Office, NY State Broadband Program Office, the New York State Telecommunications Association, RTO Wireless, Slic Network Solutions, Hudson Valley Wireless, Clarity Connect and Clarity Fiber Solutions, Otsego Electric Cooperative, and Verizon.

• MuralNet met with Rural Broadband Auctions Task Force, Wireline Competition Bureau, Office of Native Affairs and Policy, and Consumer and Governmental Affairs Bureau staff on January 15, 2020, to discuss the draft RDOF order. MuralNet suggested the Commission hold the RDOF auction after the licenses available via the tribal priority filing window are awarded. It said doing so will allow tribes that establish their own wireless network or expand their existing network with that license a chance at seeking additional funding to strengthen their network.

• SpaceX met with Wireline Communications Bureau and the Office of Economics and Analytics staff on January 16, 2020, to discuss the draft RDOF order. It discussed latency for satellite-based systems, and suggested the Commission not adopt a standalone voice requirement and instead, require providers that receive funding to operate at latencies capable of providing VoIP service.

• The Wireline Competition Bureau issued a public notice on January 21, 2020, announcing it updated a report showing the legacy support amounts associated with competitive ETCs offering service to fixed locations. The Bureau said a fixed competitive ETC was inadvertently omitted from the previous version of the report and is now included. The Bureau said as of June 1, 2019, fixed competitive ETCs began receiving legacy support at a reduced level.

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• The FCC filed an opposition with the U.S. Court of Appeals for the D.C. Circuit on January 17, 2020, to a motion for stay filed by CarrierX, the operating subsidiary for FreeConferenceCall.com, in the case reviewing the FCC’s access arbitrage order. The FCC argued petitioners do not attempt to show that the transition period adopted was unreasonable or unsupported by the record and a stay would cause substantial harm to the public interest by leaving in place access stimulation schemes that the Commission has long sought to discourage. Intervenors, AT&T and Sprint, also filed an opposition and said movants cite no justification for waiting over three months to file the motion.

• The FCC filed a brief with the U.S. Court of Appeals for the D.C. Circuit on January 17, 2020, in the case addressing petitions for review filed by Aureon and AT&T of several FCC orders on Aureon’s tariff. The FCC asserted it correctly treated Aureon like other carriers in subjecting it to the access rate cap adopted in 2011 and it correctly determined Aureon is subject to bill-and-keep transition requirements.

• AT&T, Sprint, T-Mobile and Verizon met with Wireline Competition Bureau and General Counsel staff on January 21, 2020, to discuss access stimulation. They discussed changes in access stimulation traffic in recent months, the application of the Commission’s new rules to entities providing VoIP
services and to the LECs partnering with those entities, and additional steps that may be needed to reduce and eliminate access arbitrage.

- An FCC notice was published in the Federal Register on January 21, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with Parts 54 and 69 filing requirements for regulation of interstate services of non-price cap ILECs and IXCs. The FCC said USAC requires, among other things, rate-of-return carriers collect projected cost and revenue data to administer the ICLS mechanism, and carriers are required to submit tariff data, including certain cost studies, to ensure that their rates are just and reasonable. PRA comments are due on March 23, 2020.

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Broadband

- The USDA announced on January 20, 2020, it has invested $18.7 million in a high-speed broadband infrastructure project that will create or improve rural e-connectivity in West Virginia. The USDA said Harrison Rural Electrification Association will use the investment to construct a FTTP network that is expected to connect 6,320 households, five educational facilities, a critical community facility and approximately 383 farms. The funding is through the USDA's ReConnect Pilot Program.

- The USDA announced on January 21, 2020, it has invested $7.1 million in two high-speed broadband infrastructure projects that will create or improve rural e-connectivity for 1250 rural households in Arkansas. The USDA said Yelcot Telephone will use a $1.7 million grant and a $1.7 million loan to upgrade facilities from copper cable and drops to a FTTH network and Mountain View Telephone will use a $3.7 million grant to upgrade facilities from copper cable and drops to an FTTH network. The funding is through the USDA's ReConnect Pilot Program.

- The USDA announced on January 27, 2020, it will begin taking applications on January 31, 2020 for the second round of $550 million in ReConnect Program loan and grant funding for high-speed broadband infrastructure. The USDA said to assist potential providers with their applications, USDA is hosting technical assistance and training webinars and workshops across the country. The USDA said in round one of the program, it announced $343,429,703 in grant and loan funding and the funded service areas include a total of 79,534 rural households.

- An FCC notice was published in the Federal Register on January 21, 2020, seeking Paperwork Reduction Act comments on a revision of a currently approved information collection associated with FCC Form 477, Local Telephone Competition and Broadband Reporting. The revisions to the information collection are necessitated by the August 2019 report and order on the new Digital Opportunity Data Collection, which made changes to the existing Form 477 data collection to reduce reporting burdens for all filers and incorporate new technologies. PRA comments are due February 20, 2020.

- The Congressional Budget Office released a cost estimate on January 21, 2020, for the Broadband DATA Act (H.R. 4229), which would require the FCC to change the way broadband data is collected, verified, and reported. The CBO estimates it will cost $52 million to implement the act over the 2020-2024 period, assuming appropriation of the authorized amounts.


- Commissioner Starks spoke at the Next Century Cities Opportunities for Bipartisan Tech Policy 2020 on January 23, 2020, regarding broadband deployment. He said through the USF, the FCC has distributed millions of dollars to bring broadband into unserved communities. He said changes to the USF are needed in order to bring broadband access to all Americans and suggested the FCC fix its
data collection systems, ensure that broadband is affordable, and to envision the connectivity needs of the future. Starks said he called for the FCC to conduct a data-driven 10-year look-back on how the FCC’s high cost programming has performed.

- The U.S. Court of Appeals for the Ninth Circuit Court issued an order on January 23, 2020, denying a petition for review filed by the Greenlining Institute, et al. that sought review of the FCC’s order that made changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. The court held the petitioners lack standing.

- Crown Castle met with Wireless Telecommunications Bureau staff on January 22, 2020, to assert clarification of the rules implementing section 6409 of the Spectrum Act is beneficial to all parties and claimed certain elements of the petitions filed by CTIA and WIA on section 6409(a) would provide such clarity.

- Public Knowledge, Common Cause, New America’s Open Technology Institute, et al. met with Wireline Competition Bureau and Office of Economics and Analytics staff on January 16, 2020, to express concern regarding the methodology, analysis, and conclusions in the Fifteenth Broadband Deployment Report Notice of Inquiry. They disagreed with the Commission’s conclusions in its two prior broadband deployment reports that broadband is being deployed to all Americans in a timely fashion. They discussed increasing the current benchmark speeds, and said mobile broadband is not a substitute for fixed broadband, among other things.

- The Wireless Telecommunications Bureau issued a public notice on January 24, 2020, seeking comment on the Department of Hawaiian Homelands petition for waiver to file as an eligible entity in the 2.5 GHz rural tribal priority window. Comments are due February 10, 2020; replies are due February 20, 2020.

### Robocalls

- The Wireline Competition and Consumer and Governmental Affairs Bureaus issued a public notice on January 24, 2020, seeking comment on the technical requirements for the reassigned numbers database, which was established in the 2018 robocall order. Comments are due February 24, 2020; replies are due March 9, 2020.

- The FCC issued a public notice on January 21, 2020, to announce the next meeting of the Consumer Advisory Committee will be held February 13, 2020. The committee is expected to consider a recommendation from the CAC Robocall Report Working Group on the gathering of data and/or sources of data relating to the availability and effectiveness of call blocking tools, as described the declaratory ruling and FNPRM.

- The FCC issued a Small Entity Compliance Guide on January 22, 2020, on the August 2019 report and order that amended the Truth in Caller ID rules to implement the anti-spoofing provisions of the RAY BAUMS Act.

- Vonage spoke with Wireline Competition Bureau and Public Safety and Homeland Security Bureau staff on January 16, 2020, to update the Commission on its STIR/SHAKEN call authentication testing.

- Transaction Network Services met with Consumer and Governmental Affairs staff on January 16, 2020, to discuss its identity protection services and the results of its September 2019 investigation report regarding trends in unlawful robocalling.

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Universal Service

- Comments are due January 27, 2020, on the NPRM on additional measures to combat waste, fraud, and abuse in the Lifeline program. Replies are due February 25, 2020. FR

- Comments are due January 27, 2020, on proposed changes to the annual and quarterly telecommunications reporting worksheets (FCC Forms 499-A and 499-Q), and accompanying instructions, to be used in 2020 to report 2019 revenues. public notice

- Broadband VI filed an opposition on January 17, 2020, to Viya’s petition for reconsideration of the Uniendo a Puerto Rico and Connect USVI Funds report and order. Replies to oppositions are due January 27, 2020. FR

- Viya filed a petition on January 21, 2020, seeking reconsideration of the December 2019 public notice announcing location counts and reserve prices for the Uniendo a Puerto Rico Fund and Connect USVI Fund Stage 2 fixed support competitive proposal process. Viya asked the Commission to revise the public notice to reflect location information that is consistent with the Commission’s direction in the Stage 2 order reflecting accurate location counts for the U.S. Virgin Islands.

- Kite met with advisors to Chairman Pai and Commissioners O’Rielly and Starks on January 22, 2020, to discuss Lifeline, including the Commission’s adoption of restrictions on payments of commissions to Lifeline enrollment representatives and the mechanics of implementation of those restrictions.

- The State E-Rate Coordinators Alliance filed a petition on January 21, 2020, seeking reconsideration of the cost allocation requirement for shared category two equipment or services that serve non-instructional facilities in the December 2019 report and order that made the E-Rate category two budget approach permanent.

- MuralNet met with Commissioner Carr’s legal advisor on January 15, 2020, to express support for the proposed Connected Care Pilot program. It urged the Commission to ensure the program include participation from Indian Health Services, an agency within the Department of Health and Human Services.

- Infinity Communications and Consulting filed a petition on January 21, 2020, seeking reconsideration and/or clarification of the decision to base student counts on full-time enrollment only contained in the E-Rate category two report and order.

- The FCC placed an item on circulation on January 24, 2020, entitled “Blanca Telephone Company – second order on reconsideration and order.”

Misc.

- The FCC issued the agenda on January 23, 2020, for its January 30, 2020 Open Meeting. It will consider a report and order that would adopt a two-phase reverse auction framework for the Rural Digital Opportunity Fund, committing $20.4 billion in high-cost universal service support to bring high-speed broadband service to unserved Americans. The FCC will also consider: an NPRM that would propose to incorporate a new technical standard for determining whether a wireless handset is hearing aid-compatible and to simplify and update the Commission’s hearing aid compatibility rules; a report and order that would adopt regulations on the handling of Video Relay Service calls by communications assistants working from their homes; a report and order that would modernize certain cable and satellite television provider notice provisions in Part 76 by requiring certain notices to be delivered to broadcasters by e-mail instead of on paper; and an enforcement action.
• The Wireline Competition Bureau issued a public notice on January 23, 2020, granting a section 214 application filed for the transfer of control of Ironton Telephone to Patricia Stewart.

• No comments were filed on a section 214 application that requested consent for the unauthorized transfer of control that occurred on July 1, 2016, when applicants transferred Vantage to Pinnacle without prior Commission approval. Reply comments are due January 30, 2020. public notice

• An FCC notice was published in the Federal Register on January 21, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection regarding access to numbering resource application information. The FCC said the information collected will be used by the FCC, state commissions, the NANPA and the Pooling Administrator to verify the validity and accuracy of such data and to assist state commissions in carrying out their numbering responsibilities, such as area code relief. PRA comments are due March 23, 2020.

• The Consumer and Governmental Affairs Bureau issued an order on January 22, 2020, addressing a slamming complaint against City Communications. The Bureau found City Communications changed complainant’s telecommunications service providers without obtaining authorization and verification from the complainant.

• An FCC notice was published in the Federal Register on January 24, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with payphone compensation. PRA comments are due March 24, 2020.

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Upcoming Filing Dates

• Jan. 28 - Comments due on Assurance Telecom’s application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. public notice

• Jan. 29 - PRA comments due on a new information collection associated with the November 2019 order on supply chain. FR

• Jan. 29 - Comments due on the Commission’s first staff report on call blocking. Replies are due February 28, 2020. FR, public notice

• Jan. 29 - Comments due on Ton80 Communications’ application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. public notice

• Jan. 30 - Replies due on a section 214 application that requested consent for the unauthorized transfer of control that occurred on July 1, 2016, when applicants transferred Vantage to Pinnacle without prior Commission approval. public notice

• Jan. 30 - Comments due on a 214 application filed by Spencer Municipal Utilities and Premier Communications requesting consent to transfer control of the Fostoria, Iowa telecommunications assets and customer base of SMU to Premier. Replies are due February 6, 2020. public notice

• Feb. 3 - Comments due on the supply chain NPRM. Reply comments are due March 3, 2020.

• Feb. 3 - Comments due on the initial designation of ZTE Corporation and Huawei Technologies, their parents, affiliates, and subsidiaries as covered companies in the November 26, 2019 supply chain order.

• Feb. 5 - Comments due on the NPRM on updating its unbundling and resale rules to reflect the marketplace realities of intermodal voice and broadband competition. Reply comments are due March 6, 2020. FR
• Feb. 6 - Replies due on a 214 application filed by Spencer Municipal Utilities and Premier Communications requesting consent to transfer control of the Fostoria, Iowa telecommunications assets and customer base of SMU to Premier. public notice

• Feb. 10 - Comments due on the Department of Hawaiian Homelands petition for waiver to file as an eligible entity in the 2.5 GHz rural tribal priority window. Replies are due February 20, 2020. public notice

• Feb. 12 - Comments due on seeking to refresh the record on ways to modernize and strengthen the truth-in-billing rules. Replies are due March 13, 2020. public notice, Federal Register

• Feb. 13 - Comments due on the NPRM on updating the Commission’s suspension and debarment rules to make them consistent with OMB guidelines to better prevent bad actors from participating in USF programs, TRS programs and the National Deaf-Blind Equipment Distribution Program. Replies are due March 16, 2020. FR.

• Feb. 20 - PRA comments due on a revision of a currently approved information collection associated with FCC Form 477, Local Telephone Competition and Broadband Reporting. The revisions to the information collection are necessitated by the August 2019 report and order on the new Digital Opportunity Data Collection. notice

• Feb. 20 - Replies due on the Department of Hawaiian Homelands petition for waiver to file as an eligible entity in the 2.5 GHz rural tribal priority window. public notice

• Feb. 24 - Comments due on the technical requirements for the reassigned numbers database, which was established in the 2018 robocall order. Replies are due March 9, 2020. public notice

• Feb. 25 - Replies due on the NPRM on additional measures to combat waste, fraud, and abuse in the Lifeline program. FR

• Feb. 28 - Replies due on the Commission’s first staff report on call blocking. FR, public notice

• Mar. 2 - PRA comments due on an extension of a currently approved information collection associated with the FCC rules that prevent the unauthorized change by telecommunications carriers of consumers’ selections of telecommunications service providers. notice

• Mar. 3 - Replies due on the supply chain FNPRM.

• Mar. 6 - Replies due on the NPRM on updating its unbundling and resale rules to reflect the marketplace realities of intermodal voice and broadband competition. FR

• Mar. 9 - Replies due on the technical requirements for the reassigned numbers database, which was established in the 2018 robocall order. public notice

• Mar. 13 - Replies due on seeking to refresh the record on ways to modernize and strengthen the truth-in-billing rules. public notice, Federal Register

• Mar 16 - Replies due on the NPRM on updating the Commission’s suspension and debarment rules to make them consistent with OMB guidelines to better prevent bad actors from participating in USF programs, TRS programs and the National Deaf-Blind Equipment Distribution Program. FR.

• Mar. 23 - PRA comments are due on an extension of a currently approved information collection regarding access to numbering resource application information. FCC notice

• Mar. 23 - PRA comments are due on an extension of a currently approved information collection associated with Parts 54 and 69 filing requirements for regulation of interstate services of non-price cap ILECs and IXC. notice
• Mar. 24 - PRA comments due on an extension of a currently approved information collection associated with payphone compensation. [FCC notice](#)

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