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### February 5, 2018 HIGHLIGHTS

- Commissioners O’Rielly and Clyburn wrote a [blog post](#) providing a list of expenses that should be excluded from reimbursement from CAF BLS and HCLS and from interstate access rates.
- The FCC [announced](#) the CAF Phase II auction is scheduled to begin on July 24, 2018, and set a March 30, 2018 deadline for applications to participate. It released a [Public Notice](#) setting out detailed procedures for the auction. The FCC released the [Order on Reconsideration](#) addressing the issues raised in challenges to the CAF Phase II Auction Order, which was adopted at its January 30, 2018 Open Meeting. The FCC [seeks](#) PRA comments on a new information collection, the Application to Participate in the CAF Phase II Auction, FCC Form 183. Comments are due March 2, 2018.
- The FCC also adopted the following items at its January 30, 2018 [Open Meeting](#); an [Order](#) to establish an Office of Economics and Analytics within the FCC; a [Second R&O and Second Order on Reconsideration](#) to enhance the effectiveness of Wireless Emergency Alerts; an [NPRM](#) proposing to eliminate the requirement that broadcast licensees and permittees routinely submit paper copies of contracts and other documents to the FCC; and a [NAL and Order](#) against DataConnex for apparent violations involving the USF Rural Health Care Program.
- The FCC issued the [tentative agenda](#) for its February 22, 2018 Open Meeting. The FCC will consider, among other things, an [Order](#) addressing the remaining issues raised in petitions for reconsideration of the Mobility Fund Phase II Order and a [Report and Order](#) to eliminate all payphone call tracking system audit and associated reporting requirements.
- The FCC released its [2018 Broadband Deployment Report](#), which, among other things, maintained the current speed standard for fixed service of 25 Mbps downloads/3 Mbps uploads. [News Release](#)
- NTCA [urged](#) the FCC to address near-term high-cost USF sufficiency concerns and other outstanding issues, and [discussed](#) performance measurements for CAF recipients. Hargray [said](#) making the expense limitations rules prospective will allow companies to modify their accounting systems to ensure none of the prohibited expenses become part of the rate base. ITTA [discussed](#) additional funding for model-based rural broadband deployment at \$200/month per location and for additional funding for legacy-based RoR carriers to alleviate the effects of the budget control mechanism.
- The Subcommittee on Communications and Technology held a [hearing](#) that considered 25 bills on improving broadband infrastructure.
- USAC filed [Federal Universal Service Support Mechanisms Fund Size Projections](#) for the 2Q 2018.
- [Reply 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.

### Other Key Upcoming Dates

- Feb. 12 - Comments due on ATA’s [Petition](#) for clarification and a waiver of Lifeline minimum service standards. Replies due February 26, 2018.
- Feb. 15 - Comments due on NECA’s 2018 Modification of Average Schedule [Formulas](#). Replies due March 2, 2018.
- 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. 21 - Comments [are due](#) on the Lifeline [NPRM and NOI](#). Replies are due March 23, 2018.
- Feb. 22 - Replies due on the robocalls [FNPRM](#).

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## USF Reform

- Commissioners O’Rielly and Clyburn wrote a [blog post](#) on January 31, 2018, on defining recoverable expenses for rate-of-return providers. They said after months of collaborative discussions both internally and with NTCA and WTA, they produced a list of expenses that should be excluded from reimbursement from CAF BLS and HCLS, and certain expenses from interstate access rates. The list is included at the bottom of the post. They said these exclusions should be considered for adoption within the Commission’s other USF programs, and they hoped they would be adopted permanently as part of the Commission’s current rate-of-return item.
- Chairman Pai issued a [statement](#) on February 2, 2018, on an Order, which was circulated in February 2017, that would increase federal funding for broadband infrastructure on Tribal lands. Pai claimed despite having formally voted for the item, Commissioner Clyburn recently withdrew her vote in favor of the Order. Pai suggested this had nothing to do with what is actually contained in the Order. Clyburn also issued a [statement](#).
- The FCC [announced](#) on January 30, 2018, the CAF Phase II auction is scheduled to begin on July 24, 2018, and set a March 30, 2018 deadline for applications to participate. The FCC also released a [Public Notice](#) on February 1, 2018, establishing procedures for the CAF Phase II auction (Auction 903). The Phase II auction will award up to \$198 million annually for 10 years to service providers that commit to offer voice and broadband services to fixed locations in unserved high-cost areas. Auction 903 will be the first auction to award ongoing high-cost USF support using a multiple-round, reverse auction. The bidding procedures, including some modifications to the FCC’s proposals, will enable a bidder to express in a simple and orderly way the amount of support it needs to provide a specified level of service to a specified set of eligible areas.
- The FCC issued the [Order on Reconsideration](#) addressing the issues raised in challenges to the CAF Phase II Auction Order, which was adopted at its January 30, 2018 Open Meeting. The Order addresses the following issues: how to compare bids of different performance levels; standalone voice requirements; Phase II auction deployment and eligibility; and state-specific bidding weights, among other matters. The Commission also adopted a process by which a support recipient that sufficiently demonstrates it cannot identify enough actual locations on the ground to meet its Phase II obligations can have its total state location obligation adjusted and its support reduced on a pro rata basis, and modified the letter of credit rules by reducing the costs of maintaining a letter of credit.
- The FCC published [a Notice](#) in the Federal Register on January 31, 2018, seeking PRA comments on a new information collection, the Application to Participate in the CAF Phase II Auction, FCC Form 183. The Commission will use the information collected to determine whether applicants are eligible to participate in the CAF Phase II auction. Comments are due March 2, 2018.
- NTCA [met with](#) Commissioner Rosenworcel’s Legal Advisor on January 26, 2018, to urge the Commission to address near-term high-cost USF sufficiency concerns and other outstanding issues that have either been presented for reconsideration or were raised in prior NPRMs. It also urged consideration of longer-term questions related to the sufficiency of high-cost USF programs and seeking comment on additional changes that could help make the programs operate even more effectively. NTCA also [met with](#) Chairman Pai’s Advisor on February 1, 2018, to discuss the same issues.
- NTCA [met with](#) Wireline Competition Bureau staff on January 31, 2018, to discuss performance measurements for CAF recipients. It said the statutory goal of "reasonable comparability" warrants testing protocols that are designed without compromises based on the underlying technology of the network that is being tested. NTCA described the need for testing to occur at locations where there is an actual subscriber, and the importance of reasonable compliance measures that preclude providers from masking limited performance capabilities in certain areas or at certain times. NTCA explained the need to consider the potential administrative and financial impacts of testing obligations on small providers, and reviewed its proposal to limit testing locations to the lesser of five percent or 50

locations per state. NTCA also reaffirmed its position that opportunities for private entities to aid in the conduct of testing should not be foreclosed.

- Hargray Communications [met separately with](#) Legal Advisors to Commissioners Clyburn and O’Rielly on January 31, 2018, to discuss the industry agreement regarding expense limitations filed by WTA and NTCA on December 20, 2017. It noted the January 31, 2018 joint blog authored by both Commissioners referenced and supported that filing. Hargray said making these rules prospective will allow companies to modify their accounting systems to ensure that none of the prohibited expenses become part of the rate base. It also indicated its support for the item on circulation, as it understood that item, and noted the balance between granting immediate relief and the need to thoughtfully address long-term budget considerations and the balance between funding for both model and RoR carriers.
- ITTA [met separately with](#) Legal Advisors to Commissioners O’Rielly, Clyburn, Carr, and Rosenworcel on January 24 and 25, 2018, to emphasize the need for additional funding for model-based rural broadband deployment at \$200/month per location and for additional funding for legacy-based RoR carriers to alleviate the effects of the budget control mechanism. ITTA emphasized the importance of the Commission’s rapid adoption of the draft Order addressing this subject.
- Alaska Communications [met with](#) Chairman Pai and Commissioners O’Rielly, Carr, and Clyburn and their Advisors on January 25 and 26, 2018, to urge the Commission to grant the pending Petition for Reconsideration in the CAF Phase II docket within the next 30 days so it can complete its initial list of census blocks and unserved locations to which it plans to deploy broadband by the third quarter of this year. It also emphasized the need for action on funding year 2017 applications in the Rural Healthcare program, and discussed the feasibility of a pilot program to address the unique circumstances in and critical importance of rural healthcare to Alaska.

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## Broadband

- The FCC issued its [2018 Broadband Deployment Report](#) on February 2, 2018, finding that the Commission is now encouraging broadband deployment on a reasonable and timely basis, but far too many Americans lack access to high-speed internet service and the FCC must continue to encourage deployment of broadband in rural areas, on Tribal lands, and in schools and libraries. The report, among other things, maintained the current speed standard for fixed service of 25 Mbps downloads/3 Mbps uploads, and found that mobile services are not currently full substitutes for fixed services. [News Release](#)
- [Chairman Pai](#), [O’Rielly](#), [Carr](#), and [Clyburn](#) issued statements on January 29, 2018, regarding a news report that the Trump Administration is considering having the federal government build and operate a nationwide 5G network.
- The House Subcommittee on Communications and Technology held a [hearing](#) on January 30, 2018, entitled *Closing the Digital Divide: Broadband Infrastructure Solutions*. The Subcommittee considered 25 bills on improving broadband infrastructure.
- The FCC [announced](#) on January 29, 2018, the Technological Advisory Council will hold a meeting on March 7, 2018, and will discuss its proposed work program for 2018.
- Google Fiber [met with](#) Wireline Competition Bureau and the Office of Strategic Planning staff on January 30, 2018, to discuss the BDAC’s vote to recommend the Commission adopt rules implementing one-touch make-ready. Google Fiber said the use of OTMR will create numerous benefits for broadband deployment and encouraged the Commission to take steps to encourage access to OTMR for all providers nationwide. Google Fiber also responded to recent filings from AT&T.
- The Competitive Carriers Association [met with](#) Wireless Telecommunications Bureau and Wireline Competition Bureau staff on January 26, 2018, to discuss barriers to broadband deployment. CCA

encouraged the Bureaus to heed its recommendations on ways to streamline broadband deployment, particularly through ongoing coordination with Tribal Nations and state and local governments.

- CTIA [met with](#) Commissioner Carr and his Legal Advisor on January 29, 2018, to encourage the Commission to find ways to target the environmental and historic preservation review of infrastructure and to streamline and provide clarity regarding the historic preservation review process.

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## Open Internet

- Commissioner Rosenworcel [spoke at](#) the State of the Net Conference on January 29, 2018, to discuss policymaking in the internet era. She discussed the issue of fake comments filed in FCC and other agency proceedings, including the Restoring Internet Freedom proceeding. She said there must be more investigation by the FBI and Department of Justice, and each agency should perform their own internal investigation and consider security measures.
- The Free State Foundation released a [paper](#) on February 2, 2018, entitled *State Executive Orders Reimposing Net Neutrality Regulations Are Preempted by the Restoring Internet Freedom Order*. The paper discussed two state executive orders in [Montana](#) and [New York](#) on state contracting. FSF asserted both attempts to establish statewide net neutrality regulatory regimes run afoul of the FCC's Order, saying federal preemption principles are not narrowly confined to proprietary interests of their governments. FSF claimed since both executive orders are inherently regulatory and seek to advance the repealed net neutrality restrictions as general policy ends, federal law provides the FCC with ample authority to preempt both state executive orders.

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## Universal Service

- The Wireline Competition Bureau released a [Public Notice](#) on January 31, 2018, granting, denying, and dismissing various petitions related to actions taken by USAC on E-rate and USF contributions. Petitions for reconsideration or applications for review of these decisions must be filed within 30 days of the Public Notice.
- USAC filed [Federal Universal Service Support Mechanisms Fund Size Projections](#) for the Second Quarter 2018 on January 31, 2018. The High Cost Support Mechanism funding requirements are projected to be \$1.126 billion. ([Appendices available on USACs website](#))
- USAC filed a second updated version of the [Lifeline National Verifier Plan](#) on January 31, 2018, which was created in response to the Lifeline Modernization [Order](#). USAC said the Plan contains a section detailing each of ten key components, as well as an introduction and a glossary of key terms. It also contains a section responding to public comments received on the Draft NV Plan. The Plan has been approved by the Wireline Competition Bureau and the Office of the Managing Director at the FCC. USAC said this updated version includes a status report, and said the system is undergoing a final system of testing validations for an early 2018 release.
- TThe Wireline Competition Bureau released an [Order](#) on February 2, 2018, granting Telrite's [Petition](#) for an extension of a waiver of sections 54.405(e)(4) and 54.410(f) for Lifeline subscribers in Puerto Rico who cannot be successfully re-certified using Puerto Rico's "Programa de Asistencia Nutricional" database and for Lifeline subscribers in the U.S. Virgin Islands, until April 30, 2018. The Bureau said it found good cause to waive the rules for all ETCs serving Lifeline subscribers residing in Puerto Rico or the USVI whose continued eligibility cannot be verified using an eligibility database and whose anniversary dates fall between April 1, 2018, and April 30, 2018.
- Telrite filed an Emergency [Petition](#) on January 30, 2018, for an extension of a waiver of sections 54.405(e)(4) and 54.410(f) for Lifeline subscribers in Puerto Rico who cannot be successfully

recertified using Puerto Rico's "Programa de Asistencia Nutricional" database and for Lifeline subscribers in the U.S. Virgin Islands, until April 30, 2018. Telrite said granting of the extension is essential to protect low-income consumers in Puerto Rico and the U.S. Virgin Islands from having their Lifeline service disconnected at a time when it is needed most.

- The Enforcement Bureau released a [Memorandum Opinion and Order](#) on January 31, 2018, denying Express Scripts' formal complaint alleging AT&T violated section 54.712(a) of the FCC's rules and section 201(b) of the Act by failing to apply certain credits to ESI's interstate telecommunications charges before calculating a USF pass-through charge on ESI's bills. The Bureau found AT&T's calculation of ESI's USF pass-through charge did not violate either section 54.712(a) or section 201(b).
- Comments were filed on February 2, 2018, on the [NPRM](#) proposing ways to ensure that rural healthcare providers get the support they need from the Rural Healthcare Program while guarding against waste, fraud, and abuse, and proposing a series of measures to ensure the RHC Program operates efficiently and within the appropriate size of the funding cap. [NTCA](#) said the most efficient use of critical USF resources, including those within the RHC, can be realized by ensuring that any modifications do not result in the overbuilding of existing infrastructure or assets supported by other USF programs. The [Rural Nebraska Healthcare Network](#) urged the Commission to direct USAC to distribute unused funds carried forward from prior years in an equitable manner for all RHC Program participants. [Peninsula Community Health Services of Alaska](#) urged the FCC to increase the budget for the RHC support mechanisms to reflect inflation over the past two decades and increases in the level of support available from those mechanisms. [All comments available to date](#). Replies are due March 5, 2018. [FR](#), [FR](#)
- Sandwich Isles Communications filed a [Reply](#) with the D.C. Circuit Court on January 30, 2018, to the FCC's [Opposition](#) to SIC's [Petition](#) for a writ of mandamus in the case considering SIC's [Petition for Review](#) of the [Memorandum Opinion and Order](#) on undersea cable lease expenses. SIC claimed the FCC mischaracterized the relief it seeks, misrepresented the proceedings before the FCC, and ignored facts regarding the amount of USF funds at issue in the petition.
- NTCA, 3 Rivers Communications, and the Montana Telecommunications Association [met with](#) Wireline Competition Bureau staff on January 25, 2018, to discuss NTCA's [Petition](#) for temporary waiver of the updated minimum service standards applicable to fixed, wireline broadband internet access service eligible for support by the Lifeline USF program. They urged the Commission to expeditiously grant the Petition, saying special circumstances justify a deviation from the strict application of the minimum service speed standard because waiver of the provision would promote and preserve the broadband adoption goals that were the principal driver of the 2016 Lifeline Reform Order.
- Funds for Learning [met separately](#) with Commissioner Rosenworcel's Legal Advisor and Wireline Competition Bureau and Office of Managing Director staff on January 17, 2018, to share its analysis of FY 2017 E-rate funding data and responses to a nationwide survey of E-rate applicants. FFL and the Alabama Supercomputer Authority [also met separately with](#) Advisors to Chairman Pai and Commissioners Rosenworcel, O'Rielly, and Clyburn and Wireline Competition Bureau and Office of the Managing Director staff on January 17, 2018, to discuss the positive impact of E-rate funding for schools in Alabama.
- Sitka Counseling sent a [letter](#) to Chairman Pai and Commissioners Clyburn, Carr, O'Rielly, and Rosenworcel on January 26, 2018, saying the current \$400 million Rural Health Care support budget is inadequate. Sitka urged the FCC to increase the budget to reflect inflation over the past two decades and increases in the level of support available from those mechanisms, as well as increased technology and telecommunications demands
- Grand River Mutual Telephone and South Central Communications filed a [Petition](#) on January 29, 2018, seeking a waiver of the Commission's study area boundary freeze to alter the boundaries of the single Iowa study area jointly operated by two affiliated companies, GRM-IA and SCC. They seek to disaggregate the study area into two Iowa study areas representing Petitioners' respective exchanges.

**Misc.**

- The FCC adopted and/or released the following items at its January 30, 2018 [Open Meeting](#): an [Order and Order on Reconsideration](#) addressing the issues raised by parties challenging the CAF Phase II Auction Orders and a [Public Notice](#) establishing procedures for the auction; an [Order](#) to establish an Office of Economics and Analytics within the FCC; a [Second Report and Order and Second Order on Reconsideration](#) to enhance the effectiveness of Wireless Emergency Alerts; an [NPRM](#) proposing to eliminate the requirement that broadcast licensees and permittees routinely submit paper copies of contracts and other documents to the FCC as specified in section 73.3613; and a [NAL and Order](#) against DataConnex for apparent violations involving the USF Rural Health Care Program. The FCC also received a [report](#) from the Public Safety and Homeland Security Bureau on its investigation into the false emergency alert that occurred in Hawaii on January 13, 2018.
- The Commission announced the [tentative agenda](#) for its February 22, 2018 Open Meeting. The Commission will consider: an [Order](#) addressing the remaining issues raised in petitions for reconsideration of the Mobility Fund Phase II Order; a [Report and Order](#) to eliminate all payphone call tracking system audit and associated reporting requirements, permit a company official to certify that a completing carrier's quarterly compensation payments are accurate and complete, and eliminate expired payphone compensation rules; an [NPRM](#) proposing rules that would apply to spectrum above 95 GHz; an [NPRM](#) to provide guidelines and procedures to implement section 7 of the Communications Act to improve Commission processes to promote the provision of new technologies and services to the public; an [NPRM](#) proposing to eliminate the requirement in section 73.2080(f)(2) that certain broadcast television and radio stations file the Broadcast Mid-Term Report (Form 397); and a [Report and Order](#) that would eliminate specific Part 74, 76, and 78 rules that require certain broadcast and cable entities to maintain paper copies of Commission rules.
- Reply comments were filed on January 26, 2018, 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. [CenturyLink](#) suggested the Commission move towards NNP in a measured way using commercial agreements while also promoting the transition from legacy to advanced networks that are or may easily become NNP capable. CenturyLink also said the Commission should consider cost allocation and recovery issues as part of its examination of NNP. [NCTA](#) supported the FCC's proposal to forbear from the statutory dialing parity requirements and eliminate its associated rules with respect to interexchange service. NCTA also said the Commission should defer elimination of the N-1 query requirement at least until the ongoing transition of NPAC management is complete. [Sprint](#) said NNP should be adopted on a nationwide basis and in a technology/network neutral manner. Sprint also agreed with commenters that commercial agreements between providers could potentially meet the demand for nationwide number portability while the industry transitions to IP-enabled networks [All replies available to date.](#)
- The FCC published a [Notice](#) in the Federal Register on January 30, 2018, to correct errors in the Code of Federal Regulations relating to the Part 36 jurisdictional separations rules. In a rule published in the Federal Register on June 2, 2017, the date "December 30, 2018" was inadvertently used. It is now replaced by "December 31, 2018," the date adopted in the Commission's underlying Order. This change is effective January 30, 2018.
- Chairman Pai sent a [letter](#) to Neustar, iconectiv, the NAPM, and PwC (Transition Oversight Manager) on February 2, 2018, on the LNPA transition. Pai said it is unacceptable that the parties have not yet agreed on a contingency rollback plan with only two months left before the transition commences. Pai said it is imperative that the parties quickly reach agreement on a workable contingency rollback approach before regional cutovers are set to begin, and requested a report on their agreement by February 16, 2018.
- The North American Portability Management filed a [letter](#) on January 29, 2018, attaching a document from the LNPA Transition Oversight Manager that provides a summary of the history, current state, and

required next steps regarding contingency rollback, which would be implemented only in case of a catastrophic, non-recoverable failure after the LNPA transition. TOM claimed Neustar's characterization of efforts to establish the contingency rollback plan as well as the current state of preparations is counterfactual.

- Neustar filed a [letter](#) on January 29, 2018, on the North American Portability Management's [response](#) to Neustar's [letter](#) that claimed the December 29, 2017 LNPA transition [status report](#) failed to inform stakeholders of key elements of transition readiness. Neustar denied NAPM's allegations, and said the Commission should refrain from interceding in contract negotiations between two private parties. Neustar said any action by the Commission without the benefit of arbitration would unlawfully abrogate the parties' arbitration agreement, suggesting the Commission wait to act until it has the benefit of an arbitral record to review, and instead it should direct the parties to exhaust all contract remedies before engaging the Commission.
- iconectiv filed a [letter](#) on January 29, 2018, to respond to Neustar's [letter](#) that requested the Wireline Competition Bureau fully disclose Article 19 of iconectiv's Master Services Agreement with the NAPM and disclose the Transition and Implementation Plan. iconectiv objected to Neustar's request, saying this information needs to remain confidential in order to protect iconectiv from misuse of the confidential terms of Article 19, which are protected by non-disclosure agreements and use restrictions. iconectiv said Neustar has presented no changed circumstances that would allow the Bureau to depart from the Commission's analysis of this issue.
- The North American Portability Management filed a [letter](#) on January 31, 2018, 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.
- Neustar filed a [letter](#) on February 1, 2018, to respond to the LNPA Transition Oversight Manager's [summary](#) of the history, current state, and required next steps regarding a contingency rollback plan, which would be implemented in case of a non-recoverable failure after the LNPA transition. Neustar asserted even if a manual rollback could work, there will be no working database to provide LNPA service once iconectiv turns on its service in a given region of the country.
- NARUC [will consider](#) eight resolutions at its Winter Policy Summit on February 11-14, 2018. The telecommunications-related resolutions include: urging the FCC to consider costs to consumers to implement nationwide number portability and cost recovery options for NNP; ensuring the Lifeline program continues to provide support to low-income households; bridging the digital divide for low-income customers; and encouraging the FCC to adopt rules that require meaningful advance notice of overloading to the pole owner.

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## Upcoming Filing Dates

- Feb. 8 - PRA comments due on an extension of a currently approved information collection that implements sections 201 and 251 and provides for physical collocation on rates, terms and conditions that are just, reasonable and nondiscriminatory, and promotes deployment of advanced telecommunications services without significantly degrading the performance of other services. [Notice](#)
- Feb. 12 - Comments due on Alaska Telephone Association's [Petition](#) seeking clarification and a waiver of Lifeline minimum service standards. Replies are due February 26, 2018. [Public Notice](#)
- Feb. 15 - Comments due on NECA's 2018 Modification of Average Schedule [Formulas](#). Replies are due March 2, 2018. [Public 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. 21 - Comments due on the Lifeline [NPRM and NOI](#). Replies are due March 23, 2018. [Order](#)
- 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. 26 - Replies due on Alaska Telephone Association's [Petition](#) seeking clarification and a waiver of Lifeline minimum service standards. [Public Notice](#)
- Mar. 2 - PRA comments due on a new information collection, the Application to Participate in the CAF Phase II Auction, FCC Form 183. [Notice](#)
- Mar. 2 - Replies due on NECA's 2018 Modification of Average Schedule [Formulas](#). [Public Notice](#)
- Mar. 5 - PRA comments due on two revisions of currently approved information collections associated with pole attachment complaint procedures and section 251 network change disclosure requirements. [Notice](#)
- Mar. 5 - Replies due on the [NPRM](#) on ways to ensure that rural healthcare providers get the support they need from the Rural Healthcare Program while guarding against waste, fraud, and abuse, and proposing a series of measures to ensure the RHC Program operates efficiently and within the appropriate size of the funding cap. [FR](#), [FR](#).
- Mar. 13 - PRA comments due on a revision of a currently approved information collection associated with changes to the approval process for service discontinuance applications for low-speed legacy services made in the November 29, 2017 [Wireline Infrastructure Order](#). [Notice](#)
- Mar. 19 - PRA comments due on the information collection requirements relating to disclosure requirements in the Restoring Internet Freedom [Order](#) requiring ISP to publicly disclose their network management practices, performance, and commercial terms of service for broadband internet access services. [Notice](#)
- Mar. 19 - PRA comments due on an extension of a currently approved information collection relating to the accounting rules that require carriers to account for adverse federal antitrust judgments and post-judgment special charges. [Notice](#)
- Mar. 23 - Replies due on the Lifeline [NPRM and NOI](#). [Order](#)

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