



## NECA's Weekly Federal Regulatory Summary

USF Reform Open Internet Broadband IP Transition USF Call Completion Misc. Upcoming Events

## February 12, 2018 HIGHLIGHTS

- The Wireline Competition Bureau issued a <u>Public Notice</u> releasing a revised <u>final list of census blocks</u> eligible for the CAF Phase II auction (Auction 903), a <u>revised list of the census block groups</u> and associated annual reserve prices and location counts, and a <u>revised map</u> showing the eligible blocks within the census block groups.
- The Wireline Competition Bureau issued a <u>Public Notice</u> to commence the challenge process for Alaska Communications Systems' proposed eligible areas for its CAF Phase II frozen support. Notifications are due March 22, 2018.
- ITTA <u>discussed</u> the Order on circulation to promote more high-speed broadband deployment in rural areas, and reiterated 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. The Small Company Coalition also <u>discussed</u> the draft Order. Great Plains Communications, et al. <u>urged</u> the FCC to increase A-CAM funding to \$200 per location.
- South Dakota Network filed a <u>Petition for Expedited Declaratory Ruling</u> asking the FCC to assert its jurisdiction over a dispute between SDN and Northern Valley Communications concerning interstate traffic and associated facilities at issue in a South Dakota case.
- The Wireline Competition Bureau released its <u>Voice Telephone Services Report</u> and <u>Internet Access</u> Services Report.
- The House <u>passed</u> the *Improving Rural Call Quality and Reliability Act of 2017*, <u>S. 96</u>, which requires intermediate providers to register with the FCC and comply with service quality standards.

# **Other Key Upcoming Dates**

- Feb. 12 Comments due on ATA's <u>Petition</u> 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 <u>Formulas</u>. Replies due March 2, 2018.
- Feb. 16 Replies due on the <u>FNPRM</u> 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.

Editor: Teresa Evert | Assistant Editor: Shawn O'Brien



## **USF Reform**

- The Wireline Competition Bureau issued a <u>Public Notice</u> on February 6, 2018, to announce it released a revised <u>final list of census blocks</u> eligible for the CAF Phase II auction (Auction 903), a <u>revised list of the census block groups</u> and associated annual reserve prices and location counts, and a <u>revised map</u> showing the eligible blocks within the census block groups. The revised lists remove census block groups with a \$0 reserve price and census blocks that overlap certain RoR carrier study area boundaries. Based on this revised list, 30,033 census block groups, containing a total of 210,647 eligible census blocks, will be available for bidding in Auction 903.
- The Wireline Competition Bureau issued a <u>Public Notice</u> on February 5, 2018, to commence the challenge process for Alaska Communications Systems' proposed eligible areas for its CAF Phase II frozen support. ACS filed a list of 6,056 locations in partially-served census blocks to which it proposes to deploy using Phase II support. Providers that qualify as an unsubsidized competitor have 45 days to notify ACS and the Commission that they already serve the specific locations in those blocks. Any identified locations that receive no response will automatically be deemed eligible for ACS deployment with Phase II frozen support. Notifications are due March 22, 2018.
- ITTA spoke with Commissioner Carr's Advisor on February 1, 2018, to discuss the Order on circulation
  to promote more high-speed broadband deployment in rural areas. ITTA reiterated 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.
- The Small Company Coalition <u>spoke with</u> Chairman Pai's Advisor on January 25, 2018, to discuss the draft Order and NPRM that will add \$500 million in USF funding for broadband deployment by rural and small carriers.
- Great Plains Communications, Consolidated Companies, Furchtgott-Roth Economic Enterprises, and Parrino Strategic Consulting met separately with Commissioners Clyburn, O'Rielly, and Carr and their Advisors and Chairman Pai and Commissioner Rosenworcel's Advisors on February 7, 2018, to urge the Commission to increase A-CAM funding to \$200 per location. They also included attachments, which they claimed show at both \$146.10 and \$200 per location many areas of the country, especially those west of the Mississippi River, receive model funding that is significantly below their A-CAM costs.
- The Competitive Carriers Association filed <u>a letter</u> on February 7, 2018, to supplement the record on the Mobility Fund II challenge process. It argued if a consumer experiences reduced speeds due to common network management processes in an area, then that speed and coverage information should be reflected in MF II challenge process data. It said the FCC must be mindful that providers can reduce network speed as a result of a subscriber expending the data limits of a certain plan and the FCC must recognize the difference in these practices when considering which data is permitted in the challenge process. CCA also claimed there are no currently available commercial service plans to facilitate the level of data usage that will be required to thoroughly test presumptively ineligible areas, and thus the Commission should consider whether devices purchased for the challenge process should be exempt from rate-based throttling practices.

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# **ICC**

South Dakota Network filed a <u>Petition for Expedited Declaratory Ruling</u> on February 7, 2018, asking
the FCC to assert its jurisdiction over a dispute between SDN and Northern Valley Communications
concerning interstate traffic and associated facilities at issue in a South Dakota case. It also asked the
FCC to declare that: a contract between SDN and an IXC entered into for the purpose of terminating
large volumes of traffic bound to a CLEC engaged in access stimulation is lawful under the
Communications Act of 1934; and CLECs enjoy no exclusive right to transport terminating traffic to



their end offices, including the related matter that the filing of a CLEC federal tariff does not confer a right to compel other carriers to use the tariffed services. SDN argued it is well established that it is the nature of the traffic, and not the physical location of the facility, that determines whether the Commission has jurisdiction, and each count of NVC's complaint invokes federal questions.

HD Tandem and Dentons met separately with Advisors to Chairman Pai and Commissioner Carr and Wireline Competition Bureau staff on February 5 and 6, 2018, to discuss its IP homing tandem proposal, which it claimed would address industry concerns over access stimulation and stimulate the IP transition. HD Tandem said under this proposal, LECs that are hosting high-volume voice applications should home to a new application IPHT, thereby offering originating carriers a more efficient optional call route.

# **Broadband**

- The Wireline Competition Bureau issued its <u>Internet Access Services Report</u> on February 7, 2018, which summarizes information on internet access connections in the United States as of December 31, 2016, as collected by FCC Form 477. The report indicates internet connections increased by about 6 percent between December 2015 and December 2016 to 376 million, and most of the growth in total internet connections is attributable to increased mobile internet access subscribership. Mobile internet connections increased 7 percent year-over-year to 270 million in December 2016, while the number of fixed connections grew to 106 million up about 3 percent from December 2015.
- Commissioner Clyburn <u>spoke</u> at the INCOMPAS Policy Summit on February 7, 2018, and discussed competition policy. She said the current FCC's preference for facilities-only competition was evident when it addressed business data services, where it did away with wholesale protections that eased retail market entry for non-facilities-based providers, when it stripped away copper retirement and discontinuance protections for competitive carriers, and in the pending Lifeline proceeding, where the Commission proposed a flat-out ban on all non-facilities-based carriers. She also discussed merger policy and competitive markets tests. She suggested bipartisan action to unleash competition in multiple-tenant environments, reducing barriers to infrastructure deployment, and adopting a federal-level one-touch make-ready approach for pole attachment reform.
- NRECA sent letters to the <u>House</u> and <u>Senate</u> Committees on Appropriations on February 9, 2018, recommending that at least \$2.5 billion of the \$10 billion for infrastructure development from the Bipartisan Budget Act of 2018 be dedicated to broadband deployment in rural areas. NRECA also asked that such funding be provided through the U.S. Department of Agriculture's Rural Utilities Service, and made available on a level playing field to all entities that have experience building rural infrastructure, including electric cooperatives.
- The Communications Workers of America met with Legal Advisors to Commissioner Clyburn and Rosenworcel on January 31, 2018, to discuss the one-touch make-ready pole attachment recommendations recently adopted by the Commission's Broadband Deployment Advisory Committee. CWA expressed concerns with certain aspects of BDAC's recommendations, such as giving the new attacher's contractor the authority to determine whether make-ready work is simple or complex.
- Charter Communications met with Legal Advisors to Chairman Pai and Commissioners Carr, Clyburn, O'Reilly, and Rosenworcel and Wireline Competition Bureau staff on February 1, 2018, to discuss pole attachment reform. Charter proposed the following reforms to the pole attachments rules: a 30-day advance notice period to give existing attachers the opportunity to move their equipment; a requirement that, if existing attachers were unable to move their equipment within that 30 days, new attachers could use contractors on an existing attachers' list of approved contractors to do any makeready work; time for an existing attacher to inspect the make-ready work that was done; and indemnification by the new attacher for any damages.
- INCOMPAS met with Legal Advisors to Chairman Pai and Commissioners O'Rielly, Clyburn, Carr, and Rosenworcel on January 31, 2018, to suggest the Commission adopt procedures that provide new attachers the option of using a one-touch make-ready process for pole attachments. INCOMPAS also



urged the Commission to exempt small cell deployment from section 106 review, and limit fees for rights-of-way and siting applications to the costs associated with the review and adding of the new facilities, among other things.

- Verizon met with Commissioner Carr's Legal Advisor on February 6, 2018, to discuss how the FCC's
  definitions of small wireless facilities and exclusions from historic preservation review apply to 4G and
  5G deployments. Verizon said the definitions of "small wireless antennas and associated equipment"
  include separate volumetric limits for antennas and for associated equipment. Verizon suggested the
  Commission make clear in any future orders that the applicable volumetric limit depends on where the
  equipment is mounted, saying this clarification is important because some 5G equipment will be
  mounted on the same poles where 4G small cells are located.
- Verizon spoke with Commissioner Carr's Legal Advisor on February 1, 2018, to discuss wireless broadband deployment. Verizon discussed the importance of reducing the costs and delays associated with tribal reviews, and urged the Commission to use its authority under sections 253 and 332(c)(7) to declare that fees for access to rights-of-way and municipal poles that exceed cost erect substantial barriers to wireless facilities deployment and therefore violate the Act. Verizon also discussed its request for a "deemed granted" remedy when the applicable section 332(c)(7) shot clock expires without action, and its support for recent state actions to enact legislation modernizing wireless facilities siting.

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# **Open Internet**

- Commissioner Clyburn spoke at U.S. Safer Internet Day in Austin, Texas on February 6, 2018. She discussed the need to protect the open internet and ensure access for everyone.
- The Internet Association sent a <u>letter</u> to Sens. Mitch McConnell (R-Ky.) and Charles Schumer (D-N.Y.) on February 8, 2018, asserting the Restoring Internet Freedom <u>Order</u> represents the complete reversal of broad, bipartisan consensus in the operation of the internet and leaves consumers with no meaningful protections to ensure their access to the entire internet. IA expressed support for the Senate Congressional Review Act resolution to invalidate the Restoring Internet Freedom Order, and urged Congress to legislate a permanent solution. Press release
- Data Foundry, Giganews, and Golden Frog met with Commissioner Clyburn and her Legal Advisor on February 6, 2018, to discuss the need for more competition by both infrastructure and internet access providers and the role carrier-neutral data centers serve in the internet ecosphere. They also discussed the importance of an open and free internet both domestically and globally and the expanding threats to individual privacy through governmental and service provider practices under the current domestic market and internationally.

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# **Call Completion**

• The House <u>announced</u> on February 9, 2018, that it unanimously passed <u>S. 96</u>, the *Improving Rural Call Quality and Reliability Act of 2017*. The bill requires intermediate providers to register with the FCC and comply with service quality standards to be set by the FCC, and requires "covered providers" to only use intermediate providers that are registered. The FCC is required to establish rules to implement the registry within 180 days of enactment. The bill now goes to the White House for President Trump's signature.



### **Universal Service**

- Commissioner O'Reilly spoke at the Hudson Institute on February 6, 2018, and discussed USF contribution reform and cost-benefit analysis throughout the agency's decision-making processes. He expressed opposition to expanding the contribution base by requiring broadband providers to pay new fees to support the USF. He said taxing broadband deters its adoption and use, and broadening the base may reduce the fees on currently assessed services, but new fees will be applied to more parts of the same consumers' bills. He also said he is pleased with the establishment of the Office of Economics and Analytics, noting the FCC adopted a requirement that OEA be given the same prominence as the Office of General Counsel and going forward each Commission rulemaking will need OEA's sign-off prior to being released to the public.
- Chairman Pai sent a <u>letter</u> to Rep. Doris Matsui (D-Calif.) on January 31, 2018, to respond to her request for updates on the status of the Lifeline National Verifier. Pai said over the last quarter FCC staff have provided guidance to USAC as it developed a process for reverifying consumers as they are migrated into the National Verifier, and assisted in finalizing paper and online forms for use with the National Verifier and obtained PRA approvals for those forms. He also discussed the delay of the launch of the National Verifier, and said he received the USAC Board of Director's full commitment to strengthen oversight and delivery of timely, secure, and reliable systems for the administration of the USF.
- The Wireline Competition Bureau issued a <u>Public Notice</u> on February 8, 2018, seeking comment on the National Lifeline Association's <u>Petition</u> requesting a declaratory ruling that Lifeline ETCs are permitted to seek reimbursement for all Lifeline-eligible subscribers served as of the first day of the month pursuant to sections 54.407(a) and 54.405(e)(3), including those subscribers that are in an applicable 15-day cure period following 30 days of non-usage. Comments are due March 12, 2018; replies are due March 27, 2018.
- The Wireline Competition Bureau released an <u>Order</u> on February 9, 2018, denying <u>Sprint's Petitions</u> for Reconsideration of the Bureau's <u>Waiver Extension Orders</u>, which granted California, New York, and Michigan additional time to implement the revised Lifeline qualifying programs set forth in sections 54.400(j) and 54.409(a)(2). The Bureau found Sprint's arguments did not warrant reconsideration of the language requiring Lifeline providers to conduct eligibility determinations and recertifications for Lifeline subscribers in California, New York, and Michigan if these states do not change their eligibility verification processes or databases to comply with the revised federal eligibility criteria by the states' waiver deadlines.
- The Wireline Competition Bureau released an Order on February 9, 2018, granting in part the California PUC's petitions requesting temporary waivers of the Lifeline program's non-usage and recertification rules (sections 54.405(e)(3), 54.405(e)(4), 54.407(c)(2), and 54.410(f)) for subscribers in 13 counties affected by the California wildfires that occurred in October and December 2017. The Bureau waived the rules through February 15, 2018, for all ETCs serving Lifeline subscribers residing in the census tracts identified as affected by the October 2017 wildfires and waived, through March 31, 2018, certain Lifeline sections for all ETCs serving Lifeline subscribers residing in the census tracts identified as affected by the December 2017 wildfires.
- NECA filed an <u>Amicus brief</u> with the D.C. Circuit Court on February 7, 2018, in support of the FCC, in the case considering SIC's <u>Petition for Review</u> of the <u>Memorandum Opinion and Order</u> on undersea cable lease expenses. NECA asserted SIC failed to meet its burden to prove its cable lease and related expenses were "used and useful," and that the FCC adequately responded to SIC's arguments.
- AT&T filed an Intervenor <u>Brief</u> with the D.C. Circuit Court on February 7, 2018, in the case considering SIC's <u>Petition for Review</u> of the <u>Memorandum Opinion and Order</u> on undersea cable lease expenses. AT&T claimed the FCC reasonably found that SIC was entitled to recover none of the "disputed" lease costs.



- Hughes Network Systems filed a <u>Petition</u> on February 5, 2018, requesting conditional designation as an ETC in the State of New York in all areas in which it has been awarded CAF Phase II support via the New NY Broadband Program. Hughes said on January 31, 2018, it was awarded support to serve 72,163 locations in New York through New York's auction for state and CAF support, and its request for ETC status is limited to areas where it has been awarded such support.
- Titonka Telephone filed a <u>letter</u> on February 9, 2018, to notify the Commission that effective July 1, 2018, it will consolidate its study area with that held by its wholly-owned subsidiary, the Burk Telephone Company, and the study area code for Titonka will be the surviving study area code. Titonka also said it plans to file a petition for waiver of sections 51.917(b)(1) and (b)(7).
- Altice filed a Request for Review of a USAC decision on February 2, 2018, seeking reversal of USAC's reclassification of revenues from certain geographically intrastate private line services as interstate, rather than intrastate. Altice claimed in an audit, USAC applied the Commission's "ten percent rule" in a manner inconsistent with well-established Commission precedent, the Administrative Procedure Act, and principles of fundamental fairness.
- Commissioner Clyburn spoke at the National Rural Health Association's Summit on February 8, 2018, discussing rural health issues. She said almost half of U.S. counties are "double burden" counties, where there are elevated levels of chronic disease and low levels of broadband connectivity. She said a solution to this would be the creation of a "health safety net" for rural America. She also discussed the Connect2Health Task Force's latest project called L.A.U.N.C.H., which is a strategic partnership between the FCC and the National Cancer Institute to focus on how broadband connectivity can be leveraged to help rural cancer patients.
- In addition to comments reported in a previous edition of REGScan, 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. USTelecom suggested reforms to free up funding from the Lower 48 states to meet the need for Telecom Program support in Alaska. USTelecom suggested: establishing a rebuttable presumption that non-mileage-based rates for telecommunications services outside Alaska are reasonably comparable between rural and urban areas; capping Telecom Program support everywhere based on the lower of the rural rate for terrestrial or functionally similar satellite services; and extending HCF and E-rate best practices to the RHC Program. NCTA suggested the Commission: update the safe harbor bandwidth tiers used to define services that are considered functionally similar; establish a list of services eligible for support under the rural healthcare programs; and make publicly available information on the services and prices that health care providers obtain with funding from the RHC programs. Alaska Communications suggested the FCC increase the budget for the RHC program, and modify section 54.609(d) so reimbursement for either technology is capped at the lower of the satellite rate or the terrestrial rate, if functionally equivalent services are available. All comments available to date. Replies are due March 5, 2018. FR, FR

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# Misc.

- The Wireline Competition Bureau issued its <u>Voice Telephone Services Report</u> on February 7, 2018, which summarizes the information collected on telephone services as of December 31, 2016. The report noted in December 2016, there were 58 million end-user switched access lines in service, 63 million interconnected VoIP subscriptions, and 341 million mobile subscriptions in the United States. Over the three-year period, interconnected VoIP subscriptions increased at a compound annual growth rate of 10 percent, mobile voice subscriptions increased at a compound annual growth rate of 3 percent, and retail switched access lines declined at 12 percent per year.
- The Wireline Competition Bureau issued a <u>Public Notice</u> on February 7, 2018, to remind telecommunications carriers and interconnected VoIP providers that annual CPNI certifications are due



March 1, 2018. The Bureau also provided FAQs, a CPNI certification template, and text of the CPNI recordkeeping and certification rules.

- Terral Telephone Company <u>met separately with</u> Chairman Pai's Advisor and Wireline Competition Bureau staff on February 6, 2018, to discuss its pending Petition to unfreeze its Part 36 category relationships.
- The American Bankers Association and nine other financial associations met with Legal Advisors to Chairman Pai and Commissioner O'Rielly on February 1, 2018, to express support for the Commission's efforts to eliminate unlawful automated calls. They discussed the negative impact of the Commission's Telephone Consumer Protection Act decisions, particularly the Commission's interpretation of the statutory definition of an automatic telephone dialing system. They asserted many of the Commission's existing TCPA interpretations impair the ability of the associations' members to use efficient dialing technologies to contact their customers with important messages.
- Transaction Network Services and Cequint met with Chairman Pai and his Advisor on February 6, 2018, to discuss the relative merits of robocall solutions and TNS' Call Guard robocall solution. TNS suggested that more clarity will be required on blocking/tagging assigned numbers that have been identified as spoofed or likely spam, and that real-time data analytics will be required before, during, and after deployment of longer term standards like STIR/SHAKEN. TNS also argued it was premature to require reporting on solution effectiveness, and suggested third parties, like TNS, could provide insights in this areas in the meantime.
- The FCC issued a <u>Public Notice</u> on February 5, 2018, announcing Chairman Pai appointed members to serve on three North American Numbering Council working groups: Call Authentication Trust Anchor Issues; Nationwide Number Portability Issues; and Toll Free Number Modernization Issues. The members of these working groups are listed in Appendix A. The selection of members for the permanent standing Numbering Administration Oversight working group is in progress, and final selections for this group will be announced at a later date.
- The FCC issued a <u>Public Notice</u> on February 6, 2018, to announce the next meeting of the North American Numbering Council will be held on March 16, 2018. The FCC said the NANC Working Groups will report on their progress in developing recommendations for the NANC's consideration and the NANC will continue its discussions on how to modernize and foster more efficient number administration in the United States.
- The North American Portability Management filed a <u>letter</u> on February 6, 2018, to express support for iconectiv's <u>letter</u> objecting to Neustar's <u>request</u> for the Wireline Competition Bureau to fully disclose Article 19 of iconectiv's Master Services Agreement with the NAPM and disclose the Transition and Implementation Plan. The NAPM agreed with iconectiv that Article 19 contains provisions that, if made public, could be leveraged by Neustar to delay the transition.
- USTelecom, CTIA, Sprint, Verizon, T-Mobile, CenturyLink, AT&T, Frontier, and Consolidated met with Chairman Pai's Legal Advisor on February 2, 2018, to discuss the current status of the LNP Administrator transition. They said one critical issue remains outstanding - a contingency plan to roll back to the current LNPA in the unlikely event that the transition to the new LNPA encounters a problem. They asked the Commission to use its oversight authority to encourage the entities responsible for the LNPA transition to resolve this issue in a way that maintains the critical LNPA transition timeline.
- The House Energy and Commerce Committee <u>announced</u> a series of hearings related to President Trump's federal budget request. The President's request is expected to be released on February 12, 2018. The FCC Commissioners will testify on February 16, 2018.
- President Trump <u>announced</u> on February 5, 2018, he intends to appoint Kenneth Johnson to be the Rural Utility Service Administrator, U.S. Department of Agriculture. Mr. Johnson serves as the general manager and CEO of Co-Mo Electric Cooperative and President for Co-Mo Connect in Tipton, MO. Chairman Pai issued a <u>statement</u> on February 6, 2018, on President Trump's <u>announcement</u>.



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# **Upcoming Filing Dates**

- Feb. 12 Comments due on Alaska Telephone Association's <u>Petition</u> seeking clarification and a waiver of Lifeline minimum service standards. Replies are due February 26, 2018. <u>Public Notice</u>
- Feb. 15 Comments due on NECA's 2018 Modification of Average Schedule <u>Formulas</u>. Replies are due March 2, 2018. <u>Public Notice</u>
- Feb. 16 Replies due on the <u>FNPRM</u> 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. <u>FNPRM</u>
- Feb. 22 Replies due on the <u>FNPRM</u> on spectrum bands above 24 GHz.
- Feb. 26 Replies due on Alaska Telephone Association's <u>Petition</u> seeking clarification and a waiver of Lifeline minimum service standards. <u>Public Notice</u>
- 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 <u>NPRM</u> 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. <u>FR</u>, <u>FR</u>.
- Mar. 12 Comments due on the National Lifeline Association's <u>Petition</u> requesting a declaratory ruling that Lifeline ETCs are permitted to seek reimbursement for all Lifeline-eligible subscribers served as of the first day of the month pursuant to sections 54.407(a) and 54.405(e)(3), including those subscribers that are in an applicable 15-day cure period following 30 days of non-usage. Replies are due March 27, 2018. <u>Public Notice</u>
- 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 <u>Wireline Infrastructure Order</u>. <u>Notice</u>
- Mar. 19 PRA comments due on the information collection requirements relating to disclosure requirements in the Restoring Internet Freedom <u>Order</u> requiring ISP to publicly disclose their network management practices, performance, and commercial terms of service for broadband internet access services. <u>Notice</u>
- 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. <u>Notice</u>



- Mar. 22 Deadline for providers that qualify as an unsubsidized competitor to notify ACS and the Commission that they already serve the blocks identified by ACS to which it proposes to deploy using CAF Phase II support. <u>Public Notice</u>
- Mar. 23 Replies due on the Lifeline NPRM and NOI. Order
- Mar. 27 Replies due on the National Lifeline Association's <u>Petition</u> requesting a declaratory ruling that Lifeline ETCs are permitted to seek reimbursement for all Lifeline-eligible subscribers served as of the first day of the month pursuant to sections 54.407(a) and 54.405(e)(3), including those subscribers that are in an applicable 15-day cure period following 30 days of non-usage. <u>Public Notice</u>

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