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February 20, 2018 HIGHLIGHTS

- President Trump released his [plan](#) for rebuilding America's infrastructure and his [FY 2019 budget](#) proposal. The \$200 billion infrastructure plan includes \$50 billion for a rural infrastructure program that would distribute funds to the states as block grants to be used for infrastructure projects in rural areas with populations of less than 50,000. Trump [discussed](#) funds for broadband in a meeting on the plan.
- The FCC released the [agenda](#) for its February 22, 2018 Open Meeting, and 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](#) eliminating expired payphone compensation rules. The FCC will also hear a presentation on a new National Broadband Map.
- The FCC issued an [Order](#) reconsidering rules adopted in the Rate-of-Return Reform Order relating to RoR LECs provision of consumer broadband-only loops. Specifically, the FCC revised rules related to the surrogate cost method and Access Recovery Charge imputation. The FCC also clarified issues relating to reductions in CAF Broadband Loop Support due to competitive overlap.
- The FCC [will hold](#) a workshop on the application process for the CAF Phase II auction on March 14, 2018. The FCC [announced](#) the OMB has approved, for a period of three years, the collection of geocoded location information from recipients of CAF Phase II support.
- The FCC [announced](#) the OMB approved a new, one-time information collection for the Mobility Fund II challenge process. The FCC [announced](#) the availability of the [web-based form](#) that participants in the MF Phase II challenge process must use to request access to USAC's challenge process portal.
- The Colorado Telecommunications Association [discussed](#) Chairman Pai's Order currently being circulated to provide additional funding for rate-of-return and model-based USF support.
- The FCC [denied](#) Level 3's complaint claiming AT&T and its price cap carrier subsidiaries filed tariff revisions that do not properly implement the year six access rate step-down in section 51.907(g)(2).
- The FCC [seeks comment](#) on SDN's [Petition](#) 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. Comments due March 14, 2018; replies due March 29, 2018.
- The FCC and [Mozilla, et al.](#), [Free Press](#), and the [County of Santa Clara, et al](#) filed joint stipulations with the D.C., First and Ninth Circuit Courts, agreeing to dismiss their protective [petitions for review](#) of the Restoring Internet Freedom [Order](#). Prior to the stipulations, the FCC [asked](#) the courts to dismiss the [petitions for review](#). AT&T, ACA, NCTA, USTelecom, and CTIA filed [motions](#) to intervene in the [cases](#).
- Democratic members of the House Energy and Commerce Committee [requested](#) information on how the FCC reviewed public comments in the Restoring Internet Freedom proceeding.
- [NTCA](#) and [WTA](#) filed comments in support of ATA's [Petition](#) seeking clarification and a waiver of Lifeline minimum service standards. Replies are due February 26, 2018. [Public Notice](#)

Other Key Upcoming Dates

- 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](#).
- Mar. 2 - Replies due on NECA's 2018 Modification of Average Schedule [Formulas](#).

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USF Reform

- The FCC issued a [Second Order on Reconsideration and Clarification](#) on February 16, 2018, reconsidering rules adopted in the March 2016 Rate-of-Return Reform [Order](#) relating to RoR LECs provision of consumer broadband-only loops. The FCC revised its rules to replace the surrogate cost method for determining the cost of CBOLs with rules employing existing separations and cost allocation procedures. The FCC also revised the rule requiring RoR carriers to impute on CBOLs an amount equal to the Access Recovery Charge that could have been assessed on a voice or voice/broadband line to better implement its intent to maintain the balance between end user charges and universal service adopted in the USF/ICC Transformation Order. The FCC also clarified issues relating to reductions in CAF Broadband Loop Support due to competitive overlap.
- The FCC issued a [Public Notice](#) on February 13, 2018, announcing the Rural Broadband Auctions Task Force, in conjunction with the Wireless Telecommunications and Wireline Competition Bureaus, will host a workshop on the application process for the CAF Phase II auction on March 14, 2018. The workshop will include detailed information about the CAF II auction application system.
- The FCC issued [a Notice](#) in the Federal Register on February 15, 2018, announcing the OMB has approved, for a period of three years, an information collection associated with the reporting requirements for recipients of CAF Phase II support. This information collection addresses the requirement that certain carriers with high-cost reporting obligations must file information about their locations that meet their broadband deployment public interest obligations via USAC's electronic portal, and also addresses the new portal reporting requirements for carriers receiving Alaska Plan support, including their submission of fiber/microwave middle mile network maps, and recipients of Phase II support that is awarded in partnership with New York's New NY Broadband Program. Rules 54.316(a)(1), 54.316(a)(5) and (6), 54.316(b)(6), 54.320(d), 54.321 are effective February 15, 2018.
- The FCC published a [Notice](#) in the Federal Register on February 14, 2018, announcing it has received OMB approval, on an emergency basis, for a new, one-time information collection for the Mobility Fund II challenge process. It indicated in conjunction with the qualified 4G LTE data separately collected pursuant to OMB 3060-1242 that will be used to create the map of areas presumptively eligible for MF-II support, the information collected under this MF-II challenge process collection will enable the Commission to resolve disputes concerning the eligibility or ineligibility of an area initially deemed ineligible for MF-II support and establish the final map of areas eligible for such support.
- The Rural Broadband Auctions Task Force, in conjunction with the Wireline Competition and Wireless Telecommunications Bureaus, issued a [Public Notice](#) on February 14, 2018, announcing the availability of the [web-based form](#) that participants in the Mobility Fund Phase II challenge process must use to request access to USAC's challenge process portal. Any eligible mobile service provider or government entity wishing to participate in the challenge process must submit its contact information via the web-based access request form to be granted access to the USAC portal. Any party wishing to receive its log-in credentials at the time the challenge process window opens should submit its access request form no later than March 15, 2018.
- The Colorado Telecommunications Association [met](#) in Colorado with Commissioner Carr and his Legal Advisor on February 12, 2018, to ask Commissioner Carr for his support for Chairman Pai's Order currently being circulated to provide additional funding for rate-of-return and model-based USF support. CTA also discussed the need for a long-term predictable funding solution for rural broadband and ensuring that broadband funding be scrutinized to avoid overbuilding of existing networks.
- The Rural Wireless Association, National Association of Surety Bond Producers, and the Surety & Fidelity Association of America [met with](#) staff from the Rural Broadband Auctions Taskforce, the General Counsel's office, and the Wireless Telecommunications and Wireline Competition Bureaus on February 8, 2018, to express concern that obtaining the necessary letters of credit by Mobility Fund II participants will be a burdensome and costly process for small and rural carriers and will tie up funds for 3-7 years. They wished to explore the possibility of utilizing surety bonds as an alternative to letters

of credit and revising the nature and scope of the secured obligation to make the financial security more widely available to small businesses.

- Lariat [spoke with](#) Wireline Competition Bureau staff on February 9, 2018, to express disappointment that several census tracts in which it already provides high speed broadband service were to be included in the CAF Phase II auction. It said subsidizing the overbuilding of small, rural ISPs, such as Lariat, would harm broadband deployment by driving some out of business and have the paradoxical effect of depriving some users of broadband. Lariat asked what contractual or other business arrangement between a small ISP and a third-party VoIP provider would satisfy the Commission that the ISP was, or was functionally equivalent to, a telephone company and thus allow it to qualify as an unsubsidized competitor and/or an ETC, and possibly bid in the CAF auction(s)?
- The California Public Utilities Commission [met with](#) Commissioner O’Rielly’s Legal Advisor on February 12, 2018, to discuss California’s broadband data and broadband grant program and the possibility of California augmentation of federal CAF Phase II Auction dollars with state broadband dollars. The PUC also [met with](#) Commissioner Rosenworcel and her Legal Advisor on February 9, 2018, to discuss the same issues, as well as the interaction between the federal and California Lifeline benefits, the timing of federal activity on Lifeline, and the CPUC’s [petition](#) for a temporary waiver of the federal Lifeline recertification and non-usage rules for Lifeline subscribers that have been affected by the recent Northern and Southern California fires.
- Standing Rock Telecommunications filed an [Amended Request](#) for limited waiver and extension of Mobility Fund I public interest obligations on February 14, 2018. SRT requests an extension of the 4G deadline until June 30, 2017, when SRT submitted drive test data to USAC for all four MFI projects. It now also requests the final disbursement of the MFI funding it was awarded and a limited waiver and extension of the MFI public interest obligations so that such final disbursement may be made.

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ICC

- The Commission issued a [Memorandum Opinion and Order](#) on February 12, 2018, denying Level 3’s complaint against AT&T, which alleged AT&T and its price cap carrier subsidiaries violated sections 201(b) and 202(a) of the Communications Act by filing tariff revisions that do not properly implement the year six step-down in section 51.907(g)(2) and by assessing the \$0.0007 per minute rate only when tandem switching and transport traffic terminates to an AT&T price cap carrier end office, but not when such traffic terminates to the end office or equivalent facility of an AT&T affiliate that is not itself a price cap carrier. The Commission found that the \$0.0007 per minute rate in section 51.907(g)(2) applies only to tandem switching and transport traffic that terminates to a price cap carrier end office.
- The Wireline Competition Bureau issued a [Public Notice](#) on February 12, 2018, seeking comment on South Dakota Network’s [Petition for Expedited Declaratory Ruling](#), which requests the Commission issue a declaratory ruling addressing questions raised in the litigation involving an agreement between SDN and AT&T under which SDN provides transport service for AT&T access traffic. The issues arise from a state court proceeding involving SDN and Northern Valley Communications. Comments are due March 14, 2018; replies due March 29, 2018.
- AT&T [spoke with](#) Wireline Competition Bureau staff on February 8, 2018, to discuss 8YY database query disparities and transitioning the database query market to bill-and-keep, with the potential for a short-term transitional solution. AT&T claimed reforming 8YY database query charges will not significantly reduce rural carrier originating access charges. AT&T suggested establishing a nationwide database query rate cap as an interim step.

Broadband

- President Trump released his [plan](#) for rebuilding America's infrastructure and his [FY 2019 budget](#) proposal on February 12, 2018. The \$200 billion infrastructure plan includes: \$50 billion for a rural infrastructure program that would distribute funds to the states as block grants to be used for infrastructure projects in rural areas with populations of less than 50,000 and \$14 billion from an infrastructure financing program would go to expanding a number of existing credit programs, including TIFIA, WIFIA, RRIF, and RUS. [White House press release](#). [Chairman Pai](#) and [Commissioner Carr](#) issued statements on the infrastructure plan.
- The White House [released remarks](#) from President Trump at a meeting with bipartisan members of Congress on February 14, 2018, on his \$1.5 trillion infrastructure investment plan. Trump said his plan includes "[f]ifty billion dollars for rural infrastructure, including broadband Internet access," and noted "[r]ural communities have not been treated fairly, so we're going to spend \$50 billion on rural infrastructure and Internet access..."
- Chairman Pai [spoke](#) at the National Congress of American Indians Executive Council Winter Session on February 15, 2018. Pai said from 2012 to 2016, the percent of Tribal area residents without broadband access dropped from 68 percent to 35 percent. He noted he recently proposed providing over \$500 million in additional funding for broadband deployment in rural America, and as part of this Order he proposed using a Tribal Broadband Factor to increase Tribal funding. He also said the FCC is reviewing its wireless infrastructure regulations and recently renewed the Native Nations Communications Task Force.
- Commissioner Clyburn [spoke at](#) the Regional Smart Cities Forum on February 15, 2018, discussing access to broadband services. She said policies must not only focus on infrastructure builds, but must include a mix of broadband access, digital literacy, and affordability programs. She noted while the high cost fund is closing the digital gap in rural communities, too many urban communities lack access, and suggested designing wireless licenses that are smaller in geographic size, which should be less expensive than traditional wireless licenses. She also noted the Lifeline and E-rate programs that help close the gap.
- The FCC issued a [Public Notice](#) on February 12, 2018, announcing the next meeting of the Broadband Deployment Advisory Committee will be held April 25, 2018. The BDAC will consider reports and recommendations from its working groups, including the Model Code for Municipalities working group and the Model Code for States working group. The BDAC will also continue its discussions on how to accelerate the deployment of broadband by reducing and/or removing regulatory barriers to infrastructure investment.
- Reply Comments were filed on February 16, 2018, on the [FNPRM](#) proposing further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. [Comcast](#) supported the FCC's proposal to codify its precedent authorizing broadband providers to engage in overlashing without seeking approval from or providing prior notice to utility pole owners. [NCTA](#) supported the FCC's affirmation of its current precedent that permits and encourages overlashing of facilities. NCTA asserted that rather than addressing the question regarding codification of this policy, several electric utilities are trying to reverse the FCC's overlashing policy and appoint themselves as arbiters for how and when overlashing occurs, including which advanced services may be deployed. [The Illinois Electric Cooperative](#) asked the FCC to consider using preemption to remove the uncertainty regarding the value that state courts may assign to nominal impact easements, which it says frustrates, delays, and jeopardizes broadband deployment projects.
- CenterPoint Energy Houston Electric and Florida Power & Light [met with](#) Commissioners O'Rielly and Carr and their Legal Advisors, and Legal Advisors to Chairman Pai and Commissioners Rosenworcel and Clyburn to discuss the Commission's current proposals to amend its rules governing pole attachments. They said, among other things, the best prospect for expedited access to poles is one-touch make-ready, and the Commission should not shorten its current timeframes for pole access.

They also [met with](#) Wireline Competition Bureau staff on February 9, 2018, and with [General Counsel staff](#) to discuss similar issues.

- The National Conference of State Legislatures sent a [letter](#) to Chairman Pai on February 9, 2018, in response to the FCC's Broadband Deployment Advisory Committee recommendations on Removing State and Local Regulatory Barriers and the discussion draft Model Code for States. NCSL said the membership of the BDAC, and therefore the recommendations and discussion drafts currently under consideration, do not reflect balanced viewpoints between industry and state and local interests. NCSL said the FCC should allow for a greater number of elected state legislators on the BDAC, and claimed the FCC has not effectively used the Intergovernmental Advisory Committee. NCSL asked Pai to meet with the IAC and allow it to offer input into the Commission's decision-making process.
- Members of the National League of Cities [met with](#) staff from the Wireless Competition and Wireless Telecommunication Bureaus on February 7, 2018, to urge the Commission to expand municipal representation on the BDAC, as well as its working groups, particularly the State Model Code Working Group. They also discussed the interplay between current and pending state legislation focused on small cell deployment and any potential federal rulemaking. NLC members also [met with](#) Commissioners Carr and Rosenworcel to discuss broadband deployment issues related to municipal governments.
- Sens. Maggie Hassan (D-NH) and Shelley Moore Capito (R-WV) [announced](#) on February 13, 2018, they introduced the *Rural Reasonable and Comparable Wireless Act of 2018*, which seeks to close the urban-rural digital divide and expand access to broadband in rural parts of New Hampshire and across the country. The bipartisan bill directs the FCC to establish a national standard for determining whether mobile and broadband services in rural areas are 'reasonably comparable' to service provided in urban areas.
- The Competitive Carriers Association [met with](#) Chairman Pai's Legal Advisor on February 13, 2018, to discuss barriers to infrastructure deployment. CCA asserted small cells and ancillary equipment are materially different than their predecessors, regarding both size, and visual or actual impact on historic or environmental property, and suggested the FCC to adopt a definition of "small cell" that takes into account carrier's current and future deployment needs. CCA also said the FCC should exercise its authority to amend current law to expedite small cell deployment by determining that small cells and Distributed Antenna System deployments are outside the scope of a federal undertaking under the National Historic Preservation Act.

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Open Internet

- The FCC and [Mozilla, et al.](#), [Free Press](#), and the [County of Santa Clara, et al](#) filed joint stipulations with the D.C., First, and Ninth Circuit Courts on February 16, 2018, to dismiss their protective [petitions for review](#) of the Restoring Internet Freedom [Order](#). Petitioners said the goal of their petitions is no longer relevant, noting that the FCC said Petitioners remain free to file new petitions for review after the summary of the Order is published in the Federal Register.
- The FCC filed separate motions with the [D.C.](#), [First](#) and [Ninth](#) Circuit Courts on February 9, 2018, seeking to dismiss [petitions for review](#) of the Restoring Internet Freedom [Order](#) filed by New America Foundation's Open Technology Institute (and consolidated cases), the County of Santa Clara et al., and Free Press. The Commission asserted the petitions are premature because the Order results from a rulemaking proceeding and a summary of the Order and the text of the amended rules have not yet been published in the Federal Register.
- AT&T, ACA, NCTA, USTelecom, and CTIA filed [motions](#) with the D.C., First, and Ninth Circuit Courts on February 14, 2018, to intervene in the [proceedings](#) addressing petitions for review of the Restoring Internet Freedom [Order](#). The parties said while the petitions for review were prematurely filed, they

filed the motions to preserve their right to participate in judicial review if the Commission's [motions to dismiss](#) the petitions are not granted.

- Twenty-four Democratic members of the House Energy and Commerce Committee sent a [letter](#) to Chairman Pai on February 13, 2018, to request information on how the Commission reviewed public comments in the Restoring Internet Freedom proceeding. They asked the Commission how it determined which comments were non-substantive, the number of consumer comments filed in the record, and how it determined which arguments filed by Congress not to consider. They requested a response by March 6, 2018.

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Call Completion

- AT&T [met with](#) Wireline Competition Bureau staff on February 15, 2018, to discuss rural call completion issues and the FCC's pending FNPRM. AT&T supported an ATIS best practices approach and discussed the need to eliminate the current data reporting and retention requirements. AT&T asserted any future approach that adopts prescribed metrics as a measuring stick cannot account for all marketplace dynamics and could ultimately prove burdensome and counter-productive. AT&T also said the FCC should maintain the Safe Harbor exemption as an incentive to providers to incorporate network management consistent with ATIS best practices.

Universal Service

- Comments were filed on February 13, 2018, on Alaska Telephone Association's [Petition](#) seeking clarification and a waiver of Lifeline minimum service standards. [NTCA](#) supported the Petition, and said the relief requested would ensure that low income consumers in remote Alaska are not cut off from the many benefits of an internet connection. [WTA](#) supported the Petition, and said the waiver will ensure that all Alaskan Lifeline customers are able to connect to the network and will also ensure that their service is affordable. Replies are due February 26, 2018. [Public Notice](#)
- [Life Wireless, i-wireless and SafetyNet Wireless](#) and the [Oceti Sakowin Tribal Utility Authority](#) filed Petitions for Reconsideration of the Lifeline Reform [Order](#) on February 15, 2018. [Life Wireless, et al.](#) seek reconsideration of the decision to eliminate the respective port freezes for voice and broadband providers. They also seek reconsideration of the FCC's decision that BIAS delivered via Wi-Fi is not eligible for reimbursement as mobile broadband under the Lifeline program rules. [OSTUA](#) seeks reconsideration of rules impacting Tribal Lands, such as eliminating Tribal Lifeline support for wireless resellers, and requested that the FCC formally consult with Tribal Nations on these and other proposed changes to Lifeline requirements impacting residents of Tribal lands.
- Commissioner Clyburn [spoke at](#) NARUC's Winter Summit on February 14, 2018, and discussed the High-Cost and Lifeline programs and USF contribution reform. She discussed how states and localities can participate in the CAF reverse auctions, and expressed concern with recent actions regarding the Lifeline program, including revocations of providers' authorizations. She asserted that including broadband connections in the contribution mechanism would not increase the total contribution burden on consumers, nor would it increase universal service expenditures. She said a hybrid connections/revenues approach would significantly reduce the per-connection fee that consumers pay, and would also significantly reduce the contribution factor.
- The FCC issued a [Public Notice](#) on February 15, 2018, announcing the release of the 2018 FCC Form 499-A (Telecommunications Reporting Worksheet), to be used in 2018 to report 2017 revenues, and Form 499-Q, to be used in 2018 to report projected and collected revenues on a quarterly basis, and accompanying instructions.

- NARUC approved two telecommunications-related resolutions at its Winter Policy Summit on February 14, 2018. The approved resolutions include: ensuring the [Lifeline program](#) continues to provide support to low-income households and bridges the digital divide for low-income customers; and urging the FCC to consider costs to consumers to implement [nationwide number portability](#) and cost recovery options for NNP.
- ATN International sent [a letter](#) to Chairman Pai on February 13, 2018, urging quick action on Viya's Petitions for emergency hurricane recovery relief in the U.S. Virgin Islands. ATNI, the parent company of Viya and Viya Wireless, said it must make difficult decisions in the coming weeks regarding how it will rebuild Viya's wireline and wireless networks, and these decisions will be driven by how much capital is available to invest in restoring the networks to pre-hurricane levels and increasing their resilience ahead of the next storm. It also suggested the Commission should act on USVI relief separately from other requests for relief.
- San Carlos Apache Telecommunications Utility, Alexicon, Mapetsi, and the National Tribal Telecommunications Association [met with](#) Wireline Competition Bureau, Office of Native Affairs and Policy, and Consumer Protection Bureau staff on February 13, 2018, to discuss Lifeline, USF, and rural healthcare. They urged the Commission to increase enhanced tribal Lifeline credit for broadband and to reinstate the National School Lunch Program eligibility criteria. They also discussed the Tribal broadband factor, and said NTTA's proposal to increase universal service funding to Tribal areas would provide a 25 percent increase in funding to carriers.
- The Oglala Sioux Tribe [met with](#) Chairman Pai and his Legal Advisor on February 13, 2018, to discuss its position on third-party verification and recertification of Lifeline eligibility.

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Misc.

- The FCC released the [agenda](#) on February 15, 2018, for its February 22, 2018 Open Meeting. The FCC 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 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. The FCC will also hear a presentation on a new National Broadband Map.
- The Federal [FY 2019 Budget](#) proposal [proposes](#), among other things, to eliminate the interest accrual on future deposits in the Rural Utilities Service borrowers' cushion of credit accounts, stating that this program is unnecessary since rural electric and telecommunications cooperatives can find comparable investment options in the private sector. (See page 120)
- The FCC released its fiscal year [2019 budget request](#) to Congress on February 12, 2018, requesting \$333,118,000 in budget authority from regulatory fee offsetting collections. This request is a decrease of \$21,170,568 or 6 percent from the FY 2018 annualized continuing appropriation level of \$354,288,568. The FCC stated the FY 2019 budget request will be used to support the following strategic goals for FY 2019: closing the digital divide; promoting innovation; protecting consumers and public safety; and reforming the FCC's processes. [Budget in Brief](#)
- The FCC issued its [FY 2017 Annual Performance Report](#) on February 12, 2018, which summarized the FCC's progress from October 1, 2016 through September 30, 2017. The FCC detailed, among other things: the formation of the Broadband Deployment Advisory Committee; new Mobility Fund Phase II

and CAF Phase II auction rules; forming the Rural Broadband Auctions Task Force; providing up to \$170 million from the CAF to expand broadband deployment in rural areas of New York State; and NPRMs to identify and address unnecessary regulatory barriers to wireline and wireless infrastructure deployment.

- The FCC released its [Strategic Plan](#) for fiscal years 2018 to 2022 on February 12, 2018. The FCC's priorities include closing the digital divide, promoting innovation, protecting consumers and public safety, and reforming the FCC's processes.
- The House Energy and Commerce Committee [approved H.R. 4986](#) on February 14, 2018, which reauthorizes the FCC and includes process reforms to ensure the FCC continues to improve its efficiency and transparency.
- The House Energy and Commerce Committee [announced](#) on February 12, 2018, postponement of its hearing on FCC Oversight, scheduled for February 16, 2018. No new date has been announced.
- To date, no comments were filed on NECA's 2018 Modification of Average Schedule [Formulas](#). Replies are due March 2, 2018. [Public Notice](#)
- The FCC issued a [Public Notice](#) on February 13, 2018, announcing that, pursuant to section 1.1200(a), presentations to the NANC, including to its subcommittees and working groups and at any roundtable discussions sponsored by the NANC, and presentations between NANC members and FCC staff or Commissioners, will be treated as exempt presentations for *ex parte* purposes. The FCC said the NANC will likely address issues that are subject to pending rulemaking proceedings, but the Commission will not rely in these proceedings on any information submitted to the NANC or to any of its subcommittees, working groups, or sponsored roundtables, or information conveyed by NANC members to FCC staff or Commissioners unless that information is first placed in the record of the relevant proceeding.
- The Wireline Competition Bureau issued a [Public Notice](#) on February 13, 2018, announcing the 25th LNP Administrator Transition Outreach and Education Plan webcast will be held on February 14, 2018, at 3:00 pm ET. PriceWaterhouseCoopers, the Transition Oversight Manager for the LNPA, will host the webcast. Interested parties may register and find additional details for the session [here](#). Materials from prior TOEP sessions as well as other LNPA transition reference documents are available [here](#).
- The Michigan Internet and Telecommunications Alliance filed a [letter](#) on February 8, 2018, to urge the Commission to ensure there is a viable and tested contingency rollback plan before the LNPA transition begins, which is currently scheduled to begin on April 8, 2018. MTIA expressed support for Chairman Pai's February 2, 2018 [letter](#) requiring further negotiation of a rollback plan.

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Upcoming Filing Dates

- 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. 12 - Comments due on the National Lifeline Association's [Petition](#) 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. [Public Notice](#)
- 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. 14 - Comments due on South Dakota Network's [Petition for Expedited Declaratory Ruling](#), which requests the Commission issue a declaratory ruling addressing questions raised in the litigation involving an agreement between SDN and AT&T under which SDN provides transport service for AT&T access traffic. Replies due March 29, 2018. [Public 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. 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. [Public Notice](#)
- Mar. 23 - Replies due on the Lifeline [NPRM and NOI](#). [Order](#)
- Mar. 27 - Replies due on the National Lifeline Association's [Petition](#) 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. [Public Notice](#)
- Mar. 29 - Replies due on South Dakota Network's [Petition for Expedited Declaratory Ruling](#), which requests the Commission issue a declaratory ruling addressing questions raised in the litigation involving an agreement between SDN and AT&T under which SDN provides transport service for AT&T access traffic. [Public Notice](#)

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