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### February 26, 2018 HIGHLIGHTS

- The FCC adopted five items at its February 22, 2018 [Open Meeting](#), including: an [Order](#) addressing the remaining issues raised in petitions for reconsideration of the Mobility Fund Phase II Order; an [NPRM](#) to provide guidelines and procedures to improve Commission processes to promote the provision of new technologies and services to the public; and a [Report and Order](#) to eliminate all payphone call tracking system audit and associated reporting requirements, and revised other payphone rules. The FCC also heard a presentation on a new [National Broadband Map](#).
- The FCC issued an [NPRM](#) proposing to update the FCC's rules on jurisdictional separations. Comments are due 30 days after publication in the Federal Register; replies due 45 days after FR.
- The FCC [published](#) the Restoring Internet Freedom [Declaratory Ruling, Report and Order, and Order](#) in the Federal Register. The item is effective April 23, 2018, except for certain amendatory instructions, which require OMB approval.
- [Mozilla](#), the [California PUC](#), and the [County of Santa Clara, CA et al.](#) filed petitions for review of the Restoring Internet Freedom [Order](#) in the D.C. Circuit and the Ninth Circuit.
- The Wireline Competition Bureau issued an [Order](#) granting in part and denying in part Allband's Petition for waiver of the per loop USF high-cost support cap of \$250 per month.
- Chairman Pai sent a [letter](#) to Rep. Andy Barr (R-Ky.) in response to his letter urging the Commission to address the high-cost USF budget shortfall. Pai also [responded](#) to various congressional letters urging the Commission to authorize additional A-CAM funding, and [responded](#) to Sen. Frank Pallone's (D-NJ) [letter](#) urging the FCC to protect federal funding for rural broadband deployment through its high-cost program.
- The FCC [announced](#) it received OMB approval for an information collection on the eligibility requirements that New York winning bidders must meet to receive CAF Phase II support.
- NTCA and WTA [discussed](#) the eligibility of certain expenses for recovery via high-cost USF support and/or regulated interstate rates. Hargray Communications also [discussed](#) expense limitations. USTelecom [discussed](#) the High Cost USF Order and FNPRM on circulation and the proposed expense limitations.
- [Reply comments](#) were filed on the [FNPRM](#) proposing further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes.
- [Comments](#) were filed on the Lifeline [NPRM and NOI](#). Replies are due March 23, 2018.
- [Reply comments](#) were filed on the robocalls [FNPRM](#).

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### Other Key Upcoming Dates

- Feb. 26 - Replies due on Alaska Telephone Association's [Petition](#) seeking clarification and a waiver of Lifeline minimum service standards. [Public Notice](#)
- Mar. 2 - Replies due on NECA's 2018 Modification of Average Schedule [Formulas](#).
- Mar. 14 - Comments due on SDN's [Petition for Expedited Declaratory Ruling](#) regarding transport service for AT&T access traffic. Replies are due March 29, 2018. [Public Notice](#)

## USF Reform

- The Wireline Competition Bureau issued an [Order](#) on February 22, 2018, granting in part and denying in part Allband's Petition for waiver of the per loop USF high-cost support cap of \$250 per month. The Bureau granted the \$457 per loop per month as requested, based on Allband's cost study, but denied its request for support to be adjusted in the future based upon continuing annual cost studies and reports to the extent those cost studies would increase support above \$457 per loop per month. The Bureau also denied Allband's request for a waiver until completion of all RUS loan payments, and instead granted Allband a waiver until March 1, 2021, which Allband may seek to renew thereafter.
- Chairman Pai sent [letters](#) to Sens. Patty Murray (D- Wash.) and Maria Cantwell (D- Wash.), Rep. Jaime Herrera Beutler (R- Wash.), and [Sen. Jon Tester \(D- Mont.\)](#) on February 13, 2018, in response to their letters urging the Commission to authorize additional A-CAM funding in Washington and Montana. Pai said he recently circulated an Order that would promote more highspeed broadband deployment in rural areas and, if adopted, would provide over \$500 million in additional funding for cooperatives and small rural carriers, including those participating in the A-CAM plan. Pai sent similar letters to the following Congress members: [Rep. Andy Barr \(R-Ky\)](#); [Rep. Dave Loebsack \(D-Iowa\)](#); [Rep. Ron Johnson \(R-Wis.\)](#); [Rep. Glen Grothman \(R-Wis.\)](#); [Rep. Sean Duffy \(R-Wis.\)](#); [Rep. Mike Gallagher \(R-Wis.\)](#); [Sen. Tammy Baldwin \(D-Wis.\)](#); [Sen. John Boozman \(R-Ark.\)](#); [Rep. Rick Crawford \(R-Ark.\)](#); [Sen. Amy Klobuchar \(D-Minn.\)](#); [Rep. Tim Walberg \(R-Mich.\)](#); [Rep. Kurt Schrader \(D-Ore.\)](#); [Sen. Charles Grassley \(R-Iowa\)](#); and [Reps. Robert Latta \(R-Ohio\), Bill Johnson \(R-Ohio\) and Brad Wenstrub \(R-Ohio\)](#).
- The FCC published a [Notice](#) in the Federal Register on February 26, 2018, announcing it received OMB approval for an information collection addressing the eligibility requirements that New York winning bidders in New York's New NY Broadband Program must meet before the Wireline Competition Bureau will authorize them to receive CAF Phase II support. The FCC granted New York a waiver of the Phase II auction rules, subject to certain conditions, making an amount up to \$170.4 million available to applicants selected in New York's New NY Broadband Program in accordance with the framework adopted in the New York Auction Order. To aid in collecting this information, the Commission has created the proposed new FCC Form 5625, which parties should use in their submissions with the FCC.
- NTCA and WTA [met with](#) Wireline Competition Bureau staff on February 20, 2018, to urge the FCC to provide clear and tailored guidance regarding the eligibility of certain expenses for recovery via high-cost USF support and/or regulated interstate rates. They expressed support for delineating explicit limitations with respect to the recoverability of specific expense categories consistent with their December 20, 2017 filing and the January 31, 2018 joint blog posted by Commissioners Clyburn and O'Reilly. They said any potential changes in scope with respect to prior long-standing cost recovery practices and preclusions should not disrupt existing cost recovery practices, and cautioned against any far-ranging, open-ended language in either a new rule or Order text that would attempt to recast, restate, or recharacterize decades of settled cost recovery standards.
- Hargray Communications [met with](#) Legal Advisors to Commissioners Carr and Rosenworcel on February 14, 2018, to discuss the industry agreement regarding expense limitations filed by WTA and NTCA on December 20, 2017, and the January 31, 2018 joint blog by Commissioners Clyburn and O'Reilly that supported that filing. Hargray said making these rules prospective in nature will allow companies to modify their accounting systems to ensure that none of the prohibited expenses become part of the rate base. Hargray indicated its support for the item on circulation, and noted the balance between granting immediate relief and the need to address long-term budget considerations and the balance between funding for both model and RoR carriers. Hargray also [met with](#) Legal Advisors to Chairman Pai and Commissioner Clyburn on February 15, 2018, to discuss the same issues.
- USTelecom [met with](#) Commissioner Clyburn and her Legal Advisor on February 20, 2018, to discuss the Order and FNPRM on circulation on the High Cost USF budget. USTelecom expressed support for the item and said it will help ensure sufficiency within the High Cost fund. USTelecom discussed how the insufficiency of funding has affected broadband providers' ability to build out fiber to rural areas.

USTelecom also discussed the proposed elimination of expenses, as discussed in Commissioners Clyburn and O'Reilly's joint blog, and said it is a good step towards ensuring the program is able to work efficiently.

- Lariat [met with](#) Chairman Pai's [Legal Advisors](#) on February 15, 2018, to discuss the January 30, 2018 CAF Phase II [Order on Reconsideration](#). It expressed disappointment that the Order and accompanying auction documents included several census tracts to which its small broadband provider - and two or three competitors - already served with high speed broadband service were to be included in the CAF Phase II auction. Lariat claimed the financial requirements in the Order might make it impossible for ISPs which were sole proprietorships to bid in the CAF auctions due to the difficulty that sole proprietorships have in obtaining Letters of Credit. Lariat also discussed the Restoring Internet Freedom Order and the 2018 Broadband Deployment Report. Lariat also met with [Commissioner O'Reilly](#) and Commissioner [Carr's Legal Advisors](#) and [OET staff](#) to discuss similar issues.

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## Broadband

- The FCC [announced](#) on February 22, 2018, it updated and modernized its National Broadband Map. The FCC said the [cloud-based map](#) will support more frequent data updates and display improvements at a far lower cost than the original mapping platform, which had not been updated in years. Improvements and features in the new National Broadband Map include, among other things: fixed deployment data based on the latest collection by the FCC and updated twice annually; deployment summaries available for seven different geographical types; and broadband availability and provider counts in each of the nation's over 11 million census blocks, available for six technologies. The FCC said while data on mobile service is not yet available on the new map, it is available on separate [maps](#). The FCC [posted](#) a demonstration of the new map on YouTube.
- Chairman Pai sent a [letter](#) to Sen. Charles Schumer (D-N.Y.) on February 7, 2018, to respond to his letter urging the Commission to reject its current proposal to downgrade the minimum benchmark definition of internet service and to treat mobile broadband as a stand-in for fixed home internet. Pai said the FCC's Section 706 report maintains the existing benchmark speeds and concluded that mobile broadband is not a full substitute for fixed service. Pai also noted that over the last year the Commission has taken steps to reduce barriers to infrastructure investment and promote competition in the broadband marketplace, and said the Commission's top priority is to bring digital opportunity to all Americans.
- Jay Schwarz, Wireline Advisor to Chairman Pai, [spoke](#) at the 2018 Utilities Broadband Workshop of the Utilities Technology Council on February 20, 2018. He said utilities are ideally positioned to get more involved in the broadband game, and said in difficult markets, utilities have been able to offer broadband to every customer in their service area without the aid of government subsidies. He discussed removing regulatory barriers to network deployment, the Broadband Deployment Advisory Committee, and said the upcoming CAF Phase II auction will be an opportunity for rural utilities to help bring broadband to their areas.
- 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. [USTelecom](#) said the FCC should streamline notice procedures for all network changes made necessary by force majeure events, and said legacy voice services should be subject to expedited discontinuance procedures. [ITTA](#) urged the FCC to adopt ITTA's proposal for the elimination of the outreach requirements adopted in the 2016 Technology Transitions Order with respect to discontinuing legacy retail services. [Verizon](#) said the FCC should affirm that intrastate services, including local telephone service, do not require a section 214(a) application; revise its approach to applying section 214 to legacy voice services when other voice options are available; forbear from applying section 214 to applications to discontinue services with no customers; and expand its streamlining for applications to grandfather and discontinue previously-grandfathered services. [AT&T](#)

said notice should occur prior to pole overloading to promote safety and the integrity and reliability of infrastructure supporting the existing attachments. AT&T also said the Commission should change the rule so that the effective date for a short-term notification is calculated from the date the ILEC files its notice or certification of the change with the Commission, and said the FCC should continue to streamline the section 214 discontinuance processes. [All replies available to date.](#)

- The FCC issued a [Public Notice](#) on February 22, 2018, announcing that the next meeting of the FCC's Technological Advisory Council has been changed from March 7, 2018, to April 12, 2018. At the meeting, the TAC will discuss its proposed work program for 2018.
- Charter Communications and Comcast [met with](#) Commissioner Carr and his Chief of Staff on February 15, 2018, to discuss wireless broadband. They suggested the Commission could advance the goal of promoting 5G deployment without creating disparities by focusing its wireless broadband deployment efforts on streamlining access to public rights-of-way for the installation of small cell equipment, and deferring any action on associated wireline facilities, including backhaul, to a more comprehensive review of wireline infrastructure.
- The Competitive Carriers Association filed a [letter](#) on February 21, 2018, on wireless infrastructure deployment. CCA said it is encouraged by the White House's recent proposal entitled "Legislative Outline for Rebuilding Infrastructure in America." CCA said current law should be amended to expedite small cell deployment and eliminate unnecessary reviews related to historic and environmental compliance. CCA suggested the FCC determine that small cells and Distributed Antenna System do not have the potential to harm historic properties and adopt a definition of "small cell" that avoids unintended consequences while adequately addressing carriers' deployment needs.

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## Open Internet

- The FCC [published](#) in the Federal Register on February 22, 2018, the Restoring Internet Freedom [Declaratory Ruling, Report and Order, and Order](#), which was released on January 4, 2018. The item is effective April 23, 2018, except for amendatory instructions 2, 3, 5, 6, and 8, which require OMB approval. The FCC said it will publish a document in the Federal Register announcing the effective date(s) of the delayed amendatory instructions, once it receives OMB approval of the modified information collection requirements in section 8.1 (amendatory instruction 5). The FCC said the Order will also be effective upon the date announced in that same document.
- [Mozilla](#), the [California PUC](#), and the [County of Santa Clara, CA, et al.](#) filed petitions for review of the Restoring Internet Freedom [Order](#) in the D.C. Circuit and the Ninth Circuit courts on February 22, 2018. Mozilla and the County of Santa Clara previously filed petitions for review of the Order, but [had agreed](#) with the FCC to withdraw them.
- The FCC released an [Erratum](#) on February 20, 2018, to the Restoring Internet Freedom [Order](#). The Commission said to conform to section 18.17 of the rules of the Administrative Committee of the Federal Register, the amendment to the heading of part 8 of the Commission's rules shall be effective 60 days after publication in the Federal Register. The erratum also made a minor change to section 20.3 in Appendix A.
- Commissioners [Clyburn](#) and [Rosenworcel](#) released statements on February 22, 2018, on the publication of the Restoring Internet Freedom [Order](#) in the [Federal Register](#), expressing their disappointment in the Order.
- Chairman Pai sent letters to [Rep. Colleen Hanabusa \(D-HI\)](#) and [Sen. Richard Blumenthal \(D. Conn.\)](#), et al. on February 8 and 9, 2018, to respond to their letters that urged the Commission to delay the vote on the Restoring Internet Freedom [Order](#) until the issue of fraudulent comments submitted in the proceeding could be investigated. Pai detailed the reasons he did not delay the vote, and asserted the

draft Order was released three weeks before the vote and provided the public the opportunity to review it and submit feedback.

- Chairman Pai sent a [letter](#) to Sen. John Tester (D-Mont.) on February 9, 2018, to respond to his letter expressing concern with the proposal to repeal net neutrality rules. Pai said the vote marked the culmination of an unprecedented level of public participation and transparency, and asserted the light-touch framework adopted in the Restoring Internet Freedom [Order](#) will help spur investment in broadband networks, particularly in the hardest to reach areas.

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## ICC

- The FCC Enforcement Bureau sent [a letter](#) to AT&T and Iowa Network Services, dba Aureon Network Services, on February 22, 2018, suspending the proceedings associated with the Petition for Reconsideration filed by Aureon. The Enforcement Bureau noted the parties are currently engaged in mediation for the dispute, and if they reach a settlement it will likely obviate the need for the Commission to address Aureon's Petition and for a damages proceeding.
- Commissioner Pai sent a [letter](#) to Sen. Charles E. Grassley (R-Iowa) on February 6, 2018, to respond to his letter asking for an update on the status of Panora Communications and Prairie Telephone's Petition for Waiver. Pai said the Commission has granted, in part, the waiver request.
- South Dakota Network [met with](#) Office of General Counsel on February 16, 2018, to discuss its [Petition for Expedited Declaratory Ruling](#) and related filings in its South Dakota state court proceeding against James Valley Cooperative Telephone Company, James Valley Communications, and Northern Valley Communications. SDN discussed the Commission's jurisdiction to address the issues raised in its Petition and the Office of General Counsel's ability to address the issues raised in the request for amicus brief to the South Dakota court. SDN also discussed the Order to Show Cause and related Motion recently filed in the South Dakota court proceeding (redacted version attached). SDN's Petition requests the Commission issue a declaratory ruling asserting its jurisdiction over a dispute between SDN and Northern Valley concerning interstate traffic and associated facilities. It also requests a declaration 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 and that 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.

## Universal Service

- Chairman Pai sent a [letter](#) to Sen. Frank Pallone (D-NJ) on February 7, 2018, in response to his letter urging the FCC to protect federal funding for rural broadband deployment through its High-Cost program. Pai discussed recent FCC actions, such as investigating Sandwich Isles Communications, directing Blanca Telephone to return more than \$6.7 million in improperly paid high-cost support, and proposed forfeitures on two companies that apparently abused the rural healthcare program. Pai also said he recently asked his colleagues to crack down on ineligible expenses in the high-cost program, saying the draft Order would adopt rules to ensure that high-cost funds cannot be used to pay for things not associated with the provision, maintenance, and upgrading of the facilities.
- Chairman Pai sent a [letter](#) to Rep. Tom O'Halleran (D-Ariz.) on February 7, 2018, to respond to his letter expressing concern with changes the Commission intends to make to the Tribal Lifeline program. Pai said a number of tribal organizations have expressed support for the [changes](#) made in November 2017.
- The FCC issued a [Public Notice](#) on February 23, 2018, announcing Petitions for Reconsideration of the Lifeline Reform [Order](#) were filed by [Life Wireless, i-wireless and SafetyNet Wireless](#) and the [Oceti](#)

[Sakowin Tribal Utility Authority](#). Oppositions to the petitions are due 15 days after publication of this notice in the Federal Register; replies are due 10 days after oppositions are filed.

- The Wireline Competition Bureau issued a [Public Notice](#) on February 20, 2018, to announce that the E-rate program funding cap for funding year 2018 is \$4,062,030,726. The new cap represents a 1.8 percent inflation-adjusted increase in the \$3,990,207,000 cap from funding year 2017.
- The Wireline Competition Bureau issued a [Public Notice](#) on February 20, 2018, to provide guidance regarding the new forms for the Lifeline program that consumers and ETCs must use to verify and recertify subscriber eligibility for the federal Lifeline benefit beginning on July 1, 2018.
- Comments were filed on February 21, 2018, on the Lifeline [NPRM and NOI](#). [WTA](#) agreed the phase down of support for voice service should be discontinued for rural areas and that funding for stand-alone voice service should be reinstated. It said at the very least, this halt of the phase down should continue until there is true comparability for urban and rural areas in terms of quality of service and affordability as required by section 254. [ITTA](#) urged the Commission to refrain from limiting Lifeline support to broadband service provided over facilities-based broadband networks that also support voice service, and encouraged the Commission to seek further comment on the particulars of a proposed Lifeline program budget cap before implementing one. [Verizon](#) said the Commission should complete the National Verifier before considering significant, additional reforms to Lifeline. It also said the Commission should not discontinue support for resellers, and should defer its review of the Lifeline budget mechanism. [INCOMPAS](#) said the FCC should: reject the proposal to remove non-facilities based providers from the Lifeline program; not adopt a self-enforcing budget; and not condition Lifeline support on the buildout of new networks. [NASUCA](#) recommended the FCC halt the current phase-down of support for Lifeline voice services and supported the continuation of the existing budget-cap mechanism. [Mobile Future](#) urged the Commission to continue providing Lifeline support for mobile broadband connectivity and the availability of mobile broadband service options for Lifeline-eligible consumers. The [New York PSC](#) said it opposes eliminating non-facilities based providers from the Lifeline program and opposes the proposed self-enforcing budget. [Hawaiian Homelands and the State of Hawaii](#) expressed support for Commission efforts to modernize the Lifeline program, including focusing on rural Tribal and underserved areas. [All comments available to date](#). Replies are due March 23, 2018. [Order](#)
- The U.S. Court of Appeals for the D.C. Circuit issued an [Order](#) on February 16, 2018, denying Sandwich Isles Communications' [Petition](#) for a writ of mandamus that asked the Court to direct the FCC to order the disbursement of universal service funds to Sandwich Isles. The Court said SIC did not show a clear and indisputable right to mandamus relief.
- SIC filed a [Reply Brief](#) with the U.S. Court of Appeals for the D.C. Circuit on February 21, 2018, in the matter of Sandwich Isles' [Petition for Review](#) of the FCC's December 5, 2016 [Memorandum Opinion and Order](#) regarding undersea cable lease expenses.
- The Wireline Competition Bureau issued a [Public Notice](#) on February 22, 2018, announcing comment and reply dates for Grand River Mutual Telephone Corporation and South Central Communications' [Petition](#) for a study area waiver in Iowa. Comments are due March 26, 2018; replies are due April 10, 2018.
- TracFone Wireless filed a [letter](#) on February 20, 2018, to express concerns with the National Lifeline Eligibility Verifier. TracFone asserted the update to the National Verifier Plan includes processes that are unnecessarily inefficient and burdensome and that contradict the Commission's stated goals for the National Verifier.
- Titonka Telephone filed a [letter](#) on February 22, 2018, to revise its February 9, 2018, [letter](#) that notified 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 said the revised letter corrected a study area code.

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## State Actions

- Vermont Governor Philip B. Scott signed an [Executive Order](#) requiring all state contracts with ISPs to include net neutrality protections. The Order specifically states that ISPs shall not block lawful content, applications, services, or nonharmful devices, subject to reasonable network management that is disclosed to its customers, or throttle or engage in any paid prioritization.

## Misc.

- The FCC adopted the following items at its February 22, 2018 [Open Meeting](#): an [Order](#) addressing the remaining issues raised in petitions for reconsideration of the Mobility Fund Phase II Order; an [NPRM](#) proposing rules that would apply to spectrum above 95 GHz; an [NPRM](#) (released) to provide guidelines and procedures to improve Commission processes to promote the provision of new technologies and services to the public; a [Report and Order](#) (released) 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; and an [NPRM](#) (released) 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). The FCC also heard a [presentation](#) on a new National Broadband Map. The FCC previously [released](#) the [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 issued an [NPRM](#) on February 22, 2018, proposing to update the FCC's rules on jurisdictional separations. The FCC seeks comment on the Joint Board's recommendation to remove from the Part 36 rules all the provisions that deal with Class A accounts, noting carriers are no longer required to keep such accounts since the revised Part 32 rules took effect on January 1, 2018. The NPRM also seeks comment on amending section 36.112 (the apportionment of general support facilities costs), the timing for making these changes to the Part 36 rules, and certain stylistic and typographical corrections to the Part 36 rules. Comments are due 30 days after publication in the Federal Register; replies are due 45 days after Federal Register publication.
- Chairman Pai sent [letters](#) to Sens. Edward J. Markey (D-Mass.) and Michael S. Lee (R-Utah) on February 6, 2018, in response to their letter urging the Commission to protect consumers from abusive and invasive robocalls and robotexts from debt collectors. Pai said the Commission has taken several major enforcement actions against some of the most egregious violators of the Truth in Caller ID Act and remains committed to holding robocall violators accountable to the fullest extent of the law.
- Chairman Pai sent [letters](#) to Sen. Robert P. Casey (D-Pa.) and Pennsylvania Attorney General Josh Shapiro on February 8, 2018, to respond to their letter requesting the Commission to immediately finalize and implement the robocall rules. Pai said in November 2017, the Commission adopted rules to allow carriers to block calls purporting to be from a phone number at a subscriber's request, saying the Order is part of the Commission's strategy for fighting unlawful robocalls.
- The FCC issued the [agenda](#) for its Consumer Advisory Committee meeting on February 26, 2018. The CAC will discuss robocalls and call blocking efforts, a call authentication recommendation, and Next Generation 911 Service, among other things.
- Reply comments were filed on February 22, 2018, on the [FNPRM](#) on potential mechanisms to ensure erroneously blocked calls can be unblocked quickly and without harm to callers and consumers, and ways to measure the effectiveness of efforts to limit robocalling. [INCOMPAS](#) noted other commenters also urged the Commission to require providers who voluntarily block calls in accordance with the Commission's new rules to offer a readily discoverable mechanism on their websites where consumers can submit a request seeking to unblock erroneously blocked calls. INCOMPAS said it joins with those stakeholders, like NTCA and the VON Coalition, who believe consumers are best protected when

providers cease blocking calls as soon as is practicable, and encouraged the Commission to reserve judgment on safe harbor provisions until a more extensive record is developed. The [Consumers Union et al.](#) suggested the FCC take the following actions to more significantly limit unwanted robocalls: require voice providers to implement caller ID authentication and offer advanced call-blocking tools to all customers, at no extra charge, by a reasonable deadline; establish an unblocking system that follows a set of criteria to ensure consumer control of the calls they receive; and require providers to submit on a quarterly basis information about the implementation and efficacy of their current call-blocking services, and release a yearly report in consultation with the FTC based on that information. [CTIA](#) said given the ongoing innovation addressing consumers' concerns, the development of tools to reduce false positives, and the nascence of the blocking rules, many commenters correctly urged the FCC to promote these voluntary activities and decline premature calls to regulate. CTIA suggested the FCC: avoid imposing mandates, such as challenge mechanisms or unblocking requirements; encourage voluntary efforts by providers to address false positives; focus on enforcement action against bad actors; decline to create new reporting obligations; and resist calls to regulate third-party call-labeling services. The [Ad Hoc Telecommunications Users Committee](#) urged the FCC to ensure the proposed rules do not inadvertently interfere with legitimate and lawful calling, and suggested the FCC: adopt specific and reasonable "redress" procedures for any third party who believes its number has been erroneously blocked, and communicate clearly and with specificity those procedures to potentially aggrieved number holders. Ad Hoc suggested if carriers fail to address third party claims of erroneous blocking pursuant to these procedures within a specified amount of time, the Commission should also provide a method for number holders to receive expedited Commission review and resolution of the claim. [All replies available to date.](#)

- The North American Portability Management sent a [letter](#) to Chairman Pai on February 23, 2018, to provide an update on the contingency rollback plan for the LNP Administrator transition. NAPM said from February 12 to February 16, it, Neustar, and iconectiv engaged in working sessions, facilitated by the TOM. NAPM said while no mutually-agreeable contingency rollback approach was identified, a number of proposals were considered, and some common ground was found, including agreement that connectivity testing and industry outreach were both beneficial and should be continued and that the current resubmission tools provided to the industry were useful.
- iconectiv sent a [letter](#) to Chairman Pai on February 20, 2018, to provide an update on the contingency rollback for the LNP Administrator transition. iconectiv asserted Neustar has not yet agreed to reactivate its NPAC database in an affected region if rollback would be necessary, and asserted the parties have not been able to converge on a testing plan that does not subject the service providers to burdensome testing and that would hold to the current schedule for LNPA cutovers. iconectiv provided information as to existing and additional testing steps that it believes could be taken.
- Neustar filed a [letter](#) on February 16, 2018, attaching documents in response to Chairman Pai's February 2, 2018 letter, and recent meetings with FCC staff, the NAPM, the Transition Oversight Manager, and iconectiv regarding contingency rollback solutions for the LNP Administrator transition. Neustar asserted it and the NAPM were unable to progress on a manual contingency rollback, and Neustar claimed that an automated approach is the only viable solution to rollback that can be implemented and validated to facilitate the Commission's objective of a seamless cutover.

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## Upcoming Filing Dates

- 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. 26 - Comments due on Grand River Mutual Telephone Corporation and South Central Communications' [Petition](#) for a study area waiver in Iowa. Replies are due April 10, 2018. [Public Notice](#)
- 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](#)
- April 10 - Replies due on Grand River Mutual Telephone Corporation and South Central Communications' [Petition](#) for a study area waiver in Iowa. [Public Notice](#)

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