

[USF Reform](#) [Open Internet](#) [Broadband](#) [IP Transition](#) [USF](#) [Call Completion](#) [Misc.](#) [Upcoming Events](#)

### March 5, 2018 HIGHLIGHTS

- The FCC issued a [tentative agenda](#) for its March 22, 2018 Open Meeting. The FCC will consider: a [Second Report and Order](#) that would clarify and modify the procedures for NHPA and NEPA review of wireless infrastructure deployments; a [Second FNPRM](#) to address the problem of unwanted calls to reassigned numbers; a [NOI](#) on location-based routing of wireless 911 calls; a [Sixth FNPRM](#) to stimulate use of and investment in the 4.9 GHz band; an [NPRM](#) proposing to streamline the reauthorization process for TV satellite stations that are assigned or transferred in combination with a previously approved parent station; and a [Second Report and Order and Second FNPRM](#) on Consumer Signal Boosters.
- President Trump [signed](#) into law [S. 96](#), the Improving Rural Call Quality and Reliability Act of 2017.
- The Wireline Competition Bureau [provided](#) additional clarification regarding FCC Form 477 and High Cost Universal Broadband reporting obligations for CAF-BLS recipients.
- The WCB and WTB issued an [Order on Reconsideration](#) partially granting and denying ATA's [Petition for Reconsideration and clarification](#) of the Bureaus' Middle Mile Map Instructions [Public Notice](#) for Alaska Plan carriers.
- The WCB [released](#) a revised list of census blocks eligible for CAF Phase II model-based support where price cap carriers accepted a state-level commitment to deploy broadband, and [announced](#) the agenda for the March 14, 2018 public workshop on the application process for the CAF Phase II auction.
- The FCC released a [Second Order on Reconsideration](#) addressing remaining issues raised in petitions for reconsideration of the Mobility Fund Phase II Order.
- The Rural Broadband Auctions Task Force, WTB, and WCB [established](#) the filing requirements and procedures to implement the Mobility Fund Phase II challenge process and detailed the procedures for processing the coverage and subsidy data. They also [published](#) the [map](#) of areas presumptively eligible for Mobility Fund Phase II support, and [announced](#) the challenge window for the MF-II challenge process will open on March 29, 2018.
- NTCA members and staff [discussed](#) barriers to broadband infrastructure deployment and 5G-enabled wireless services in rural areas, expressed support for prompt action by the FCC to address USF funding shortfalls, and urged the FCC to restore longer-term predictability to the USF programs.
- The WCB issued [an Order](#) suspending and setting for investigation Iowa Network Services d/b/a Aureon's switched transport tariff filing.
- The FCC [announced](#) oppositions to Petitions for Reconsideration of the Lifeline Reform [Order](#) filed by [Life Wireless, i-wireless and SafetyNet Wireless](#) and the [Oceti Sakowin Tribal Utility Authority](#) are due March 19, 2018. Replies are due March 27, 2018.

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### Other Key Upcoming Dates

- 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 a [Public Notice](#) on March 1, 2018, providing additional guidance and clarification regarding FCC Form 477 and High Cost Universal Broadband (HUBB) reporting obligations. CAF-BLS recipients with less than 80 percent pre-existing deployment in their study area as of December 31, 2015, are subject to defined deployment and HUBB filing obligations, per the 2016 RoR Reform Order. CAF-BLS recipients with 80 percent or more pre-existing deployment are not subject to defined deployment and HUBB filing obligations. Any CAF-BLS recipient that believes its pre-existing deployment percentage is incorrect due to an error in its filed 2015 FCC Form 477 data must refile corrected data. However, corrected 2015 FCC Form 477 data that shows a carrier 80 percent or more deployed will not convert a CAF-BLS carrier with a defined deployment and HUBB filing obligations into a carrier without these obligations. Nor would any additional deployment included in the corrected FCC Form 477 submission be credited towards or reduce their deployment obligation. CAF-BLS recipients with defined deployment obligations can receive credit for only those locations deployed after May 25, 2016. The Bureau also clarified ongoing HUBB reporting obligations.
- The Wireline Competition and Wireless Telecommunications Bureaus issued an [Order on Reconsideration](#) on February 28, 2018, granting in part and denying in part the Alaska Telephone Association's [Petition for Reconsideration](#) of the Bureaus' Map Instructions [Public Notice](#) and seeking clarification regarding Alaska Plan carriers' map data filing obligations. The Bureaus granted the Petition with respect to the required data accuracy standard for the map collection due to be filed in 2018 and extended the March 1, 2018 submission deadline until July 1, 2018. They also provided clarification regarding the data to be filed on "community anchor institutions." The attached Appendix revises the original Map Instructions to reflect this relief. They denied the Petition in all other respects.
- The Wireline Competition Bureau released a [Public Notice](#) on March 2, 2018, announcing the release of a revised list of census blocks eligible for CAF Phase II model-based support where price cap carriers accepted a state-level commitment to deploy broadband. The Bureau indicated this revised list reflects revisions based on responses to the June 8, 2017 Public Notice, which updated the list of eligible blocks released when the FCC announced the offers of model-based support to price cap carriers in 2015. Price cap carriers accepting statewide offers of support had until March 1, 2018, to file deployment data demonstrating whether they have met their first interim deployment milestone.
- The Rural Broadband Auctions Task Force, in conjunction with the Wireless Telecommunications and Wireline Competition Bureaus, released a [Public Notice](#) on February 27, 2018, announcing the agenda for the March 14, 2018 public workshop on the application process for the CAF Phase II auction (Auction 903). The agenda includes a review of the application to participate process, an overview of the prohibited communications rule, and a preview of the bidding system.
- The FCC released on February 27, 2018, the [Second Order on Reconsideration](#) addressing remaining issues raised in petitions for reconsideration of the Mobility Fund Phase II Order, which was adopted at its February 22, 2018 [Open Meeting](#). The FCC granted the requests of petitioners, insofar as it amended the rules to apply the collocation requirement for MF-II recipients to "all newly constructed" towers. The FCC affirmed its decision to require MF-II recipients to obtain a letter of credit, but granted the petitions insofar as it modified the LOC requirements to align its MF-II rules with recent changes made in the CAF Phase II proceeding. The FCC denied petitions seeking reconsideration of the FCC's decisions to establish an MF-II budget of \$4.53 billion over a term of ten years, disburse annual support on a monthly basis, and adopt performance metrics for supported networks requiring a median data speed of 10/1 Mbps and data latency of 100 milliseconds round trip, among other things.
- The Rural Broadband Auctions Task Force, with the Wireless Telecommunications and Wireline Competition Bureaus, released a [Public Notice](#) on February 27, 2018, detailing the filing requirements and procedures to implement the Mobility Fund Phase II challenge process and describing the procedures for processing the coverage and subsidy data and creating the initial eligible areas map, the specific parameters for the data that challengers and respondents will submit as part of the challenge process, and a process for validating challenges.

- The Rural Broadband Auctions Task Force, in conjunction with the Wireline Competition and Wireless Telecommunications Bureaus, released a [Public Notice](#) on February 27, 2018, announcing they have published the [map](#) of areas presumptively eligible for Mobility Fund Phase II support. They also announced the challenge window for the MF-II challenge process will open on March 29, 2018, noting the USAC challenge process portal will be posted on the [FCC's website here](#). Interested parties have 30 days to review the initial eligible areas map before the challenge window opens, and beginning March 22, 2018, any party that submits contact information to the [portal access request form](#) and obtains login credentials will be able to test its credentials by logging in to the portal. The challenge window will remain open for 150 days, until August 27, 2018, and only challenges certified by August 27, 2018, will proceed. [News Release](#)
- NTCA members and staff [met with](#) Commissioner Carr and his Chief of Staff on February 26, 2018, during NTCA's annual meeting in Austin, Texas. NTCA members discussed their concerns regarding the ability to offer affordable multichannel video programming services to consumers and barriers to the effective deployment of broadband infrastructure and 5G-enabled wireless services in rural areas. NTCA expressed support for prompt action by the FCC to address USF funding shortfalls that are hindering investment in the kinds of networks necessary to promote and sustain advanced services in rural areas on a basis reasonably comparable to urban areas. NTCA also urged the FCC to restore longer-term predictability to the USF programs, and raised concerns regarding the sustainability of federal USF support mechanisms given deterioration in the current contributions base.
- CenturyLink, Verizon, AT&T, Frontier, Windstream, and USTelecom [met with](#) Wireline Competition Bureau staff on February 22, 2018, to discuss CAF Phase II reporting and transition issues. They outlined concerns with the current process for updating information already submitted to and incorporated in the HUBB portal, and discussed the need to permit providers to make automated updates, including dropping locations, to previously submitted information. They also discussed approaches to rationalizing legacy obligations and support in light of the upcoming CAF II Auction, suggesting the FCC could utilize cost model support levels to create a factor to adjust the level of frozen support as a function of the funded areas that are successfully bid on and won within the CAF II Auction.
- CenturyLink filed [a letter](#) on February 28, 2018, to certify that it has met the first interim CAF II milestone in all of its states other than Colorado, Kansas, and South Dakota, and that for each of these three states, it has deployed to thirty-eight percent or more of the CAF II locations in the state. CenturyLink claimed the data currently in the HUBB does not accurately reflect CenturyLink's deployment for meeting the first interim CAF II milestone, but it was unable to make changes to the HUBB data because, as currently configured, the HUBB portal will only accept records with new geospatial points and cannot amend previously loaded points. CenturyLink said pending modifications to the HUBB, it is separately providing a complete record of its December 31, 2017 CAF II broadband deployment location data to USAC.

[Back to Highlights](#)

## Call Completion

- President Trump [signed](#) into law on February 26, 2018, [S. 96](#), the *Improving Rural Call Quality and Reliability Act of 2017*. The bill requires intermediate providers that offer the capability to transmit voice communications and signaling information from one destination to another, and that charge a rate to any other entity (including an affiliated entity) for such a transmission, to register with the FCC and comply with service quality standards to be established by the FCC.
- Chairman Pai issued [a statement](#) on February 27, 2018, after President Trump [signed](#) into law the *Improving Rural Call Quality and Reliability Act of 2017*. Pai said the Act "gives the FCC another tool to tackle this problem head-on. The new law empowers the agency to oversee a significant source of rural call completion failures: so-called 'intermediate' carriers who carry calls between originating carriers (on the caller's side) and terminating carriers (on the recipient's side). The FCC now can also

establish service quality standards for call completion by intermediate carriers, and the tools to hold them accountable.”

[Back to Highlights](#)

## Open Internet

- Chairman Pai issued a [statement](#) on February 26, 2018, on the February 26, 2018 Ninth Circuit [decision](#) to uphold a lower court’s denial of AT&T Mobility’s motion to dismiss an action taken by the FTC on AT&T’s data throttling activities and reaffirming FTC authority over the non-common carrier activities of common carriers. Pai said the decision “reaffirms that the Federal Trade Commission will once again be able to police Internet service providers after the Restoring Internet Freedom Order takes effect.”
- The [National Hispanic Media Coalition, NTCH](#), and the [Benton Foundation](#) filed petitions for review of the Restoring Internet Freedom [Order](#) in the D.C. Circuit on February 23, 26 and 27, 2018, respectively. Free Press filed a [Petition for Review](#) on March 1, 2018, of the Restoring Internet Freedom [Order](#) in the D.C. Circuit. [All PFRs available to date.](#)

[Back to Highlights](#)

## ICC

- The Wireline Competition Bureau’s Pricing Policy Division issued [an Order](#) on February 28, 2018, suspending and setting for investigation Iowa Network Services d/b/a Aureon’s switched transport tariff filing. The Division concluded substantial questions of lawfulness exist regarding how Aureon revised the switched transport rate, and it questions whether Aureon complied with the Aureon Enforcement Order in revising its switched transport rate.
- South Dakota Network filed [a letter](#) on February 28, 2018, to make a correction to its February 21, 2018 ex parte, pertaining to a meeting it had with the Office of General Counsel about its Petition for Expedited Declaratory Ruling and related filings in its South Dakota state court proceeding against James Valley. SDN indicated it provided the OGC with [a link to a brief](#) the OGC filed with the U.S. Court of Appeals for the Second Circuit, and in an abundance of caution, it wished to provide notice of its reference to this document to OGC.
- James Valley Cooperative Telephone Company, James Valley Communications, and Northern Valley Communications filed [a letter](#) on February 27, 2018, to inform the Commission that James Valley has prepared a filing that asks the Commission to deny South Dakota Network’s [Petition for Declaratory Ruling](#), promptly issue the amicus brief requested by the state court, and correct what it claimed are false and misleading representations SDN made in its Petition and in recent ex parte submissions to the Office of General Counsel. James Valley said SDN has refused its request to provide the Commission with certain confidential information by objecting to a request James Valley made to the state court to confirm that these materials could be filed with the Commission. James Valley indicated it intends to show that SDN’s Petition misrepresents the true nature of SDN’s secret agreement with AT&T, and asserted if SDN is going to seek a Declaratory Ruling regarding the lawfulness of that contract, it should be part of the public record. James Valley said as soon as the state court rules on its request to permit these materials to be filed, it will submit its filing to the Commission.

[Back to Highlights](#)

## Broadband

- Virgin Islands Telephone Corporation and Vitelcom Cellular (Viya) filed a [Request for Extension of Time](#) on February 28, 2018, of the FCC Form 477 March 1, 2018 filing deadline. Viya seeks a 19-day

extension of the deadline, claiming an extension is reasonable given the severity of the damage in the U.S. Virgin Islands and the ongoing disruption to Viya's operations caused by Hurricanes Irma and Maria.

- Corning filed a [report](#) on February 26, 2018, as a follow-up to the report attached to its comments in the wireline infrastructure proceeding. Corning said the report concludes that allowing one-touch make-ready has the potential to enable wider deployment of next generation fiber and wireless networks in many areas of the country, but also finds that higher costs/fees on next generation wireless network operators could significantly decrease investment in and further deployment of such networks.
- CPS Energy met with staff to Commissioners [Carr](#), [O'Rielly](#), and [Rosenworcel](#) and the [Wireline Competition and Wireless Telecommunications Bureaus](#) on February 28 and March 1, 2018, to discuss its pole attachment practices and the Commission's proceedings relating to pole attachments and overloading.
- The Competitive Carriers Association filed a [letter](#) on February 26, 2018, asserting the Commission needs to find that small cells and Distributed Antenna System deployments are outside the scope of a "federal undertaking" under the National Historic Preservation Act. CCA claimed small cells and DAS are materially different than their tower and macrocell predecessors, and asserted the Commission should adopt a definition of "small cell" that takes into account the current and future nature of small cells. CCA said for sites not outside the scope of a federal undertaking, the Commission should streamline review under the NHPA and the National Environmental Policy Act.
- Uniti Fiber filed a [letter](#) on March 2, 2018, on small cell deployment and Commissioner Carr's [remarks](#) at the Consumer Technology Association's 5G Day on Feb. 28, 2018. Uniti Fiber agreed with Carr that the section 106 review process is broken, and expressed support for efforts to protect and to preserve cultural and historic interests of Tribal Nations, but asserted applying the current process designed to address concerns associated with the impact of macrocell installations to small cell deployments is completely inapposite. Uniti Fiber supported efforts to streamline deploying small cell facilities, including reform of the section 106 review process.
- Reply comments were filed on February 22, 2018, on the [FNPRM](#) proposing to make spectrum available at or above 24 GHz for 5G wireless, Internet-of-Things, and other advanced spectrum-based services. [AT&T](#) suggested the FCC expeditiously auction millimeter wave spectrum and ensure the rules adopted for such auctions provide licensees with the certainty and flexibility necessary to make these bands a flourishing ecosystem capable of supporting innovative 5G, Internet-of-Things, and other advanced services. [Verizon](#) said the FCC should continue to evaluate flexible performance metrics that will encourage new, innovative use cases to flourish, and harmonize auction rules across the millimeter bands by eliminating the pre-auction spectrum cap of 1250 megahertz for the 28 GHz, 37 GHz, and 39 GHz bands. [CTIA](#) said the FCC should promptly issue a public notice on the procedures for upcoming auctions in bands for which it has already adopted service rules, allocate additional spectrum for licensed terrestrial use, and seek further comment on the best use of the 26 GHz band. [All replies available to date.](#)

[Back to Highlights](#)

## Universal Service

- The FCC [published](#) in the Federal Register on March 2, 2018, the [Public Notice](#) 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 March 19, 2018; replies are due March 27, 2018.
- The Wireline Competition Bureau released an [Order](#) on February 26, 2018, granting a limited waiver of the Commission's invoicing rules to allow certain E-rate program applicants and service providers to submit invoices beyond the 120-day extension already received and allowed by the Commission's

rules. The Bureau said it waives the invoice extension rule to provide extraordinary relief for applicants and service providers that timely requested and received the one-time 120-day extension to invoice for funding year 2016 recurring charges from USAC and are currently awaiting, or recently received, a revised funding commitment decision letter issued for a post-commitment change request submitted to USAC.

- The Wireline Competition Bureau released a [Public Notice](#) on February 28, 2018, granting, denying, and dismissing various petitions related to actions taken by USAC on E-rate and USF contributions. Petitions for reconsideration or applications for review of these decisions must be filed within 30 days of the Public Notice.
- The Alaska Telephone Association filed [reply comments](#) on February 26, 2018, on its [Petition](#) seeking clarification and a waiver of Lifeline minimum service standards. ATA said there were no oppositions to its Petition, and claimed the relief requested would bring substantial benefits by ensuring that eligible remote Alaskans have options for Lifeline service similar to those available to consumers in the Lower 48 - a choice between mobile wireless or fixed service at affordable rates. [Public Notice](#)
- The Wireline Competition Bureau released an [Order](#) on March 1, 2018, granting Telrite's [Petition](#) seeking an extension of the temporary waiver of Lifeline recertification and non-usage rules in Puerto Rico and the U.S. Virgin Islands, through May 31, 2018. Telrite filed the Emergency [Petition](#) on February 26, 2018, seeking an extension of the [temporary waiver](#) 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 Lifeline subscribers in Puerto Rico and the U.S. Virgin Islands until such time as the Bureau determines that lifting the waiver is in the public interest.
- PRWireless filed an [Emergency Petition](#) on February 28, 2018, for a waiver of Lifeline recertification rules for subscribers in Puerto Rico. PRWireless asked the Commission to waive the annual Lifeline recertification rules for 2017 with respect to customers who have anniversary dates in October through December and cannot be verified by an eligibility database, and temporarily waive the recertification rules with respect to the remaining customers until the Bureau assesses the hurricane recovery and determines an appropriate recertification timetable.
- The California PUC filed a [Petition](#) on February 27, 2018, seeking a temporary waiver of the time to comply with the elimination of the federal port freeze that was made in the Lifeline Reform [Order](#). The PUC requested a four-month extension of time, until July 15, 2018, stating it needs additional time to conduct a regulatory process to determine what, if any, changes are needed to the California Lifeline Program due to elimination of the federal port freeze.

[Back to Highlights](#)

## State Actions

- The Washington State Legislature [passed a bill](#) on February 28, 2018, which seeks to protect an open internet in the state. The bill states, among other things, any person providing broadband internet access service in the state may not: block lawful content, applications, services, or nonharmful devices, subject to reasonable network management; impair or degrade lawful internet traffic on the basis of internet content, application, or service, or use of a nonharmful device, subject to reasonable network management; or engage in paid prioritization. The bill goes to Gov. Jay Inslee (D- Wash.) for signature.
- New Jersey Governor Philip Murphy (D- NJ) signed an [Executive Order](#) on February 5, 2018, which ordered that an ISP shall not, with respect to any consumers in New Jersey: block lawful content, applications, services, or nonharmful devices, subject to reasonable network management that is disclosed to the consumer; throttle, impair or degrade lawful Internet traffic based on Internet content, application, or service, or use of a nonharmful device, subject to reasonable network management that is disclosed to the consumer; or engage in paid prioritization, among other things.

- The Oregon Senate [passed](#) a [bill](#) on February 26, 2018, seeking to preserve net neutrality in the state. The bill, among other things, will: prohibit broadband internet access service providers from disclosing, selling, or permitting access to personal information of customers, require broadband ISPs to take reasonable measures to protect personal information of customers, and require BIAS providers to provide notice of provisions of the Act to potential customers. The bill is awaiting Gov. Kate Brown's (D- Ore.) signature.

### Misc.

- The FCC issued a [tentative agenda](#) on March 1, 2018, for its March 22, 2018 Open Meeting. The Commission will consider: a [Second Report and Order](#) that would clarify and modify the procedures for NHPA and NEPA review of wireless infrastructure deployments; a [Second FNPRM](#) to address the problem of unwanted calls to reassigned numbers; a [Notice of Inquiry](#) examining location-based routing of wireless 911 calls to ensure calls are routed to the proper 911 call center; a [Sixth FNPRM](#) to stimulate use of and investment in the 4.9 GHz band; an [NPRM](#) proposing to streamline the reauthorization process for TV satellite stations that are assigned or transferred in combination with a previously approved parent station; and a [Second Report and Order and Second FNPRM](#) that would remove the personal use restriction for Provider-Specific Consumer Signal Boosters and seeks comment on ways to further expand access to Consumer Signal Boosters.
- The FCC Consumer Advisory Committee adopted a [Recommendation](#) February 26, 2018, on caller ID authentication, saying caller ID authentication using the SHAKEN implementation of the STIR protocol presently is a promising solution to help address spoofing that leads to illegal or other unwanted robocalling. It suggested once the technology is finalized and ready for implementation, the FCC should ensure that: all voice providers are encouraged to implement caller ID authentication as broadly and quickly as possible; service providers and third-party call-blocking services can offer consumers the ability to block, under appropriate circumstances, calls that fail to authenticate the caller ID information; and consumers have better protections from spoofed calls originating internationally, which accounts for a significant portion of fraudulent calls.
- The National Consumer Law Center and Consumers Union [met with](#) FCC staff on February 26, 2018, to discuss the FNPRM on robocalls. They clarified a point in reference to their proposed centralized system for evaluating call unblocking requests, saying if an unblocking system is established before caller ID authentication technology has been fully implemented, an alternative means to confirm the accuracy of the caller ID information may be used.
- The House Energy and Commerce Committee and the Senate Commerce, Science, and Transportation Committee [announced](#) they reached a bipartisan, bicameral agreement on [RAY BAUM'S Act \(H.R. 4986\)](#), which will be voted on in the House of Representatives on March 6, 2018. The legislation, among other things: reauthorizes the FCC and includes provisions to ensure the Commission continues to improve its efficiency and transparency; enacts key provisions from the Senate-approved MOBILE NOW Act (S. 19) to boost the development of next-generation 5G wireless broadband by identifying more spectrum; directs the FCC to craft a national policy for unlicensed spectrum that includes certain specific considerations and recommendations; and advances proposals that would help the FCC and law enforcement protect consumers from fraudulent telephone calls.
- NECA filed [2017 Interim Modification of Average Schedules and 2018 Further Modification of Average Schedules](#) on February 26, 2018, containing revisions to reflect the effects of the 2017 Tax Cut and Jobs Act on average schedule company revenue requirements. The 2017 interim revisions are proposed to become effective for a six-month period beginning on January 1, 2018, and the proposed effective date for the 2018 Further Modification is for the period July 1, 2018 through June 30, 2019. NECA filed a [letter](#) on February 27, 2018, correcting the proposed effective dates for the 2018 Further Modification identified in the February 26, 2018 transmittal letter.
- To date, no replies were filed on NECA's 2018 Modification of Average Schedule [Formulas](#). [Public Notice](#)

- The Wireline Competition Bureau issued a [Public Notice](#) on February 28, 2018, seeking comments on Red Spectrum Communications' application for authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. Comments are due March 15, 2018.
- The North American Portability Management filed a [letter](#) on February 28, 2018, to provide a summary of the NAPM's status updates on the transition of the current LNPA, Neustar, to the new LNPA, iconectiv. NAPM said it will continue to file updates of this report with the FCC at the end of each month until the transition is complete.
- Neustar filed a [letter](#) on February 23, 2018, to respond to recent letters by [iconectiv](#) and the [NAPM](#) on the contingency rollback plan for the LNP Administrator transition. Neustar claimed the NAPM and Transition Oversight Manager have ignored Neustar's recommendations regarding minimum criteria, and have expressed no intention or ability to meaningfully demonstrate that the limited options they will accept are sound or reliable.
- Comcast [met with](#) staff from Chairman Pai's office on February 22, 2018, to discuss the status of the LNPA transition. Comcast said it has engaged in thorough testing for more than six months of its readiness for the new NPAC transition. Comcast said as one of a limited number of wireline providers that ports numbers on Sunday, it is comfortable with the process to manually reissue its transactions in the unlikely event that a catastrophic failure occurs after cutover to the new NPAC vendor. Comcast said despite the low likelihood that a rollback is necessary, Comcast is amenable to engaging in manual rollback testing if it does not delay the transition.

[Back to Highlights](#)

## Upcoming Filing Dates

- 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. 19 - Oppositions due on Petitions for Reconsideration of the Lifeline Reform [Order](#) filed by [Life Wireless, i-wireless and SafetyNet Wireless](#) and the [Oceti Sakowin Tribal Utility Authority](#). Replies are due March 27, 2018. [FR](#)
- 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. 27 - Replies due to oppositions to Petitions for Reconsideration of the Lifeline Reform [Order](#) filed by [Life Wireless, i-wireless and SafetyNet Wireless](#) and the [Oceti Sakowin Tribal Utility Authority](#). [FR](#)
- 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](#)

[Back to Highlights](#)

Editor: [Teresa Evert](#) | Assistant Editor: [Shawn O'Brien](#)