March 12, 2018 HIGHLIGHTS

- The Rural Broadband Auctions Task Force and the Wireline Competition and Wireless Telecommunications Bureaus released instructions for completing the short-form application (FCC Form 183) for entities seeking to participate in the CAF Phase II auction.

- Chairman Pai proposed directing $954 million in USF funding to restore and expand communications networks in Puerto Rico and the U.S. Virgin Islands.

- NTCA discussed USF reform and the need for bright-line, carefully tailored guidance with respect to eligible cost recovery going forward.

- Reps. Greg Walden (R-Ore.), Frank Pallone (D-N.J.), and Ben Ray Lujan (D-N.M.) asked Chairman Pai to revise the FCC's OpEx limitation rules for carriers serving Tribal lands. Mescalero Apache Telecom asked the FCC to approve the current OpEx relief Order on circulation that recognizes the additional costs of providing telecommunications services on tribal lands.

- The U.S. Judicial Panel on Multidistrict Litigation issued an Order announcing the Ninth Circuit Court has been selected to consolidate the petitions for review of the Restoring Internet Freedom Order.

- The Senate Subcommittee on Communications, Technology, Innovation, and the Internet will hold a hearing on March 13, 2018, to explore ways to close the digital divide in an infrastructure package and review the lessons learned from broadband infrastructure projects in the ARRA of 2009.

- The House Committee on Small Business Subcommittees on Health and Technology and Agriculture, Energy, and Trade held a hearing on the urban/rural digital divide.

- The FCC Managing Director announced the proposed universal service contribution factor for the second quarter of 2018 will be 18.4 percent, down from the current 19.5 percent.


- The FCC and FTC announced they will co-host a Policy Forum on illegal robocalls on March 23, 2018, and a Stop Illegal Robocalls Technology Expo on April 23, 2018.

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
- Mar. 22 - Deadline for unsubsidized competitors 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.
USF Reform

- The Rural Broadband Auctions Task Force and the Wireline Competition and Wireless Telecommunications Bureaus issued a Public Notice on March 8, 2018, releasing instructions for completing the short-form application (FCC Form 183) for entities seeking to participate in the CAF Phase II auction (Auction 903). The instructions are available on the Connect America Fund Phase II Auction (Auction 903) website under the “Education” tab, where they will remain available and accessible for reference. The Notice indicates when filling out FCC Form 183, an applicant should follow the instructions, along with the short-form application procedures as set forth and explained in the Auction 903 Procedures Public Notice. Additional guidance, data, and information related to the Phase II auction is available on the CAF Phase II Auction website.

- NTCA spoke separately with Chairman Pai and Commissioner O’Rielly’s Advisors on March 7, 2018, to discuss USF reform and the need for bright-line, carefully tailored guidance with respect to eligible cost recovery going forward. NTCA also spoke with Chairman Pai’s Advisors on March 8, 2018, to discuss the same issues.

- Reps. Greg Walden (R-Ore.), Frank Pallone (D-N.J.), and Ben Ray Lujan (D-N.M.) sent a letter to Chairman Pai on March 9, 2018, to ask the Commission to act expeditiously to revise the Commission’s operating expense limitation rules as they pertain to carriers serving Tribal lands. They said revising the operating expense limitation rules will allow carriers serving Tribal lands to be adequately compensated for necessary expenses, enabling these carriers to continue deployment in unserved areas.

- Mescalero Apache Telecom sent a letter to Chairman Pai and Commissioners Clyburn, O’Rielly, Rosenworcel, and Carr on March 6, 2018, to request the Commission approve the current operating expense relief Order on circulation that recognizes the necessary and additional costs of providing telecommunications services on tribal lands. It said this relief, which is based on a proposal from the National Tribal Telecommunications Association, is critical to the operations of multiple carriers serving tribal lands. MATI said this relief is critical for it to remain viable, claiming it will be forced to begin laying off employees in the next couple of months if relief is not granted.

- Ten Senators sent Chairman Pai a letter on March 8, 2018, to express concern that the map released by the FCC with presumptively eligible areas for Mobility Fund II support may not be an accurate depiction of areas in need of USF support and the Commission’s proposed challenge process may not be robust enough to adequately address the shortcomings. They urged the Commission to accurately and consistently identify areas that do not have unsubsidized 4G LTE service and provide Congress with an update on final eligible areas before auctioning $4.53 billion in MF II support. Senator Roger Wicker (R-Miss.) issued a Press Release.

- Empire State Development Corporation met with Chairman Pai and his Advisor on March 5, 2018, to update the FCC on the progress of New York’s New NY Broadband Program. It reviewed the results of New York’s Phase III auction and described how the State leveraged CAF Phase II support, combined with matching State funding and private investment, to achieve 99.9% broadband availability throughout New York. They also discussed the timing of upcoming coordination between the State and Commission as well as ways the parties could collaborate on broadband deployment issues again in the future. Empire State Development Corporation also spoke with Wireline Competition Bureau staff on March 6, 2018, to discuss similar issues.

Open Internet

- The U.S. Judicial Panel on Multidistrict Litigation issued an Order on March 8, 2018, announcing the Ninth Circuit Court has been randomly selected to consolidate the petitions for review of the Restoring
Internet Freedom Order that were filed in the Ninth and D.C. Circuits. Petitions have been filed by; The Benton Foundation, Free Press, Mozilla, the National Hispanic Media Coalition, NTCH, Open Technology Institute at New America, Public Knowledge, Etsy, the Coalition for Internet Openness, the Center For Democracy and Technology, State of NY, et al, and Vimeo in the D.C. Circuit, and the California PUC and County of Santa Clara, California, et al, in the Ninth Circuit.

- The House Energy and Commerce Committee held a hearing on March 7, 2018, entitled Review of Emerging Tech’s Impact on Retail Operations and Logistics. The hearing examined how e-commerce has changed the face of retail, with impacts on supply chain operations, delivery, and consumer expectations. David Borris, Main Street Alliance Executive Committee Member and owner of Hel’s Kitchen Catering, expressed concern that the changes to net neutrality will significantly and unfairly undermine market access and competition on the internet. He also said Congress must maintain strong net neutrality rules that foster innovation and enable small businesses to equalize their goods and services with big e-commerce businesses. Testimony was also given by: Jonathan E. Johnson, III, Board of Directors, Overstock.com; Dan Sanker, President and Chief Executive Officer, CaseStack; and Rob Taylor, CEO, Convey.

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- The Pricing Policy Division issued an Erratum on March 5, 2018, to its February 28, 2018 Order that suspended and set for investigation Aureon’s switched transport rate tariff. The PPD corrected the second sentence in paragraph 6 to read: “Persons making ex parte presentations must file in WC Docket No. 18-60 a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies).”

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Broadband

- The Senate Subcommittee on Communications, Technology, Innovation, and the Internet will hold a hearing entitled “Rebuilding Infrastructure in America: Investing in Next Generation Broadband,” on March 13, 2018. The hearing will explore the most effective and efficient ways to close the digital divide in an infrastructure package and review the lessons learned from broadband infrastructure projects in the American Recovery and Reinvestment Act of 2009. Witnesses will include: Mike Romano, Senior Vice President for Policy, NTCA; Bob DeBroux, Vice President of Regulatory Affairs, TDS Telecom; Gary Resnick, Mayor, City of Wilton Manors, Fla.; Steve Berry, Chief Executive Officer, Competitive Carriers Association; and Brad Gillen, Executive Vice President, CTIA.

- The House Committee on Small Business Subcommittees on Health and Technology and Agriculture, Energy, and Trade held a hearing on March 6, 2018, entitled, “Disconnected: Rural Broadband and the Business Case for Small Carriers.” The hearing examined the disparities between large, nationwide carriers and small, rural carriers that contribute to the urban/rural digital divide and the challenges inherent in the current regulatory and operational schemes that limit the ability of small carriers to deploy broadband in rural America. Derrick B. Owens of WTA was one of the witnesses at the hearing, discussing USF, rural broadband infrastructure, and regulatory and reporting requirements. He said the USF High Cost Program supports rural broadband networks and needs to be sufficiently funded, suggesting at the very least, an inflationary adjustment to the High Cost Program is warranted so that current problems regarding the sufficiency and predictability of support are not exacerbated. He also suggested Congress directly allocate a portion of President Trump’s $50 billion infrastructure plan specifically for rural broadband infrastructure purposes. Other witnesses were: Erin Fitzgerald of RWA; Tim Donovan of CCA; and Paul Carliner of Bloosurf.
• Sens. Chuck Schumer (D-N.Y.), Patrick Leahy (D-Vt.), Ron Wyden (D-Ore.), Bill Nelson (D-Fla.), Tom Carper (D-Del.), Debbie Stabenow (D-Mich.), Maria Cantwell (D-Wash.), Bernie Sanders (I-Vt.), and Sherrod Brown (D-Ohio) introduced a $1 trillion infrastructure plan. Their proposal seeks to invest billions to modernize airports and waterways, rebuild schools and VA hospitals, overhaul road and bridge repairs, and equip rural communities with high-speed internet.

• Commissioner Clyburn and San Francisco Mayor Mark Farrell issued a joint statement on March 6, 2018, on municipal broadband. They said “[w]e both have been strong advocates for municipal fiber because we know that many consumers feel inadequately served by their private provider, if they are even served at all. This country has a history of allowing communities to take local control of important utilities such as water, electricity and sewer services – the internet should be no different.” They said they “are strongly advocating for net neutrality on municipal projects, in addition to stringent privacy and security protections for consumers and businesses.”

• Commissioner Clyburn spoke at the NHIT-HIMSS Leadership Conference, Leveraging Health IT to Address Health Disparities, on March 7, 2018, discussing broadband and health issues. She said the Connect2Health FCC Task Force is focused on understanding the future when it comes to broadband, advanced technology, and health, and ensuring the FCC stays ahead of the innovation curve.

• The FCC issued a Notice in the Federal Register on March 12, 2018, seeking Paperwork Reduction Act comments on a revision of a currently approved information collection associated with: pole attachment complaint procedures; implementing LECs’ obligations to provide their competitors with dialing parity and non-discriminatory access to certain services and functionalities; ILECs’ duty to make network information disclosures; and numbering administration. These revisions are a result of changes made in the November 29, 2017 Wireline Infrastructure Order. PRA comments are due April 12, 2018.

• iGillottResearch released a white paper on March 7, 2018, entitled “A Cyber Economy: The Transactional Value of the Internet in Rural America.” The paper, commissioned by the Foundation for Rural Service, detailed iGR’s survey results on differences in internet usages between urban and rural Americans. The survey found, among other things: internet usage among urban and rural consumers was largely similar; rural consumers are responsible for more than 10.8 billion internet-driven transactions annually out of a total of 69.9 billion annual internet-driven transactions; and the estimated value of rural online transactions is nearly $1.4 trillion -14 percent of all internet-driven transactions, or 7 percent of the U.S. nominal GDP. NTCA issued a press release on the paper.

• Verizon met with staff from the Wireline Competition and Wireless Telecommunications Bureaus and Office of Strategic Planning and Policy Analysis on March 6, 2018, to discuss pole attachment reforms. Verizon said the Commission should adopt the BDAC’s recommendation on one-touch make-ready, and should also include the following principles: OTMR can apply to both simple and complex make-ready; the pole owner should keep the list of approved contractors; and the new attacher’s contractor should determine whether make-ready work is complex, among other things.

• ACA met with Wireline Competition Bureau and Wireless Telecommunications Bureau staff on March 6, 2018, to discuss the NPRM and FNPRM concerning barriers to obtaining access to poles. ACA suggested the FCC: codify the Commission’s overhasting precedent; define a complete application; facilitate joint surveys; enhance the self-help remedy; and ensure make-ready charges are just and reasonable.

• NCTA, Comcast, Charter Communications, and Cox met with Chairman Pai’s Wireline Advisor and Wireline Competition Bureau staff on February 28, 2018, to discuss pole attachments. NCTA presented its Accelerated and Safe Access to Poles Proposal, claiming compared to other pole access proposals in the record, the ASAP Proposal would enable faster deployment of broadband facilities for new attachers while also providing greater protections to existing networks.

• ACT-The App Association filed a letter on March 5, 2018, on the draft Second Report and Order that would modify the procedures for NHPA and NEPA review of wireless infrastructure deployments, which
will be considered at the March 22, 2018 Open Meeting. ACT claimed the future of IoT innovations and the app economy will depend on the strength and density of 5G networks, which are supported by myriad spectrum bands and different types of infrastructure, including small cell deployment, that seamlessly work together. ACT asserted small cell deployment, which can add density to a network to help manage increasing traffic, is critical to the realization of a robust 5G network.

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Universal Service

- The FCC announced on March 5, 2018, Chairman Pai has proposed directing $954 million in USF funding to restoring and expanding communications networks in Puerto Rico and the U.S. Virgin Islands, which were damaged and destroyed during the 2017 hurricane season. Specifically, the FCC proposes to create a $750 million Uniendo a Puerto Rico Fund (Bringing Puerto Rico Together Fund) and a $204 million Connect USVI Fund. Each fund will provide additional short-term assistance for restoring communications networks in the aftermath of Hurricanes Irma and Maria and longer-term support for expanding broadband access throughout the islands.

- The FCC Managing Director issued a Public Notice on March 9, 2018, announcing the proposed universal service contribution factor for the second quarter of 2018 will be 18.4 percent, down from the current 19.5 percent.

- USAC filed the Federal Universal Service Support Mechanism Quarterly Contribution Base for Second Quarter 2018 on March 5, 2018. The total projected collected interstate and international end-user revenue base to be used in determining the contribution factor for the USF Support Mechanisms for Second Quarter 2018 is $12,805,676,391, down from $12,871,991,125 in the previous quarter.

- The FCC filed an Opposition with the Tenth Circuit on March 5, 2018, to Blanca Telephone’s motion for an injunction pending appeal in a proceeding in which Blanca seeks review of FCC orders finding Blanca improperly claimed millions of dollars of USF support for which it was not eligible. The Commission said the Court lacks jurisdiction over Blanca’s Petition for Review, and should dismiss it, as there is no final Commission order subject to judicial review. The Commission also said Blanca has not demonstrated that it will suffer irreparable harm unless relief is granted, and its requested relief would harm contributors to the Universal Service Fund and is otherwise contrary to the public interest.

- Reply comments were filed on March 5, 2018, on the NPRM proposing ways to ensure that rural healthcare providers get the support they need from the Rural Healthcare Program while guarding against waste, fraud, and abuse, and proposing a series of measures to ensure the RHC Program operates efficiently and within the appropriate size of the funding cap. AT&T said at a minimum, the Commission should adopt a rebuttable presumption that the rates for non-mileage-based telecommunications services between urban and rural areas are reasonably comparable, and suggested the Commission phase out the Telecom Program but continue with the Healthcare Connect Fund program, giving rural healthcare providers the ability to demonstrate an urban-rural rate disparity in excess of the HCF Program’s 65 percent discount. GCI recommended the FCC: update its rules to reflect its light-touch approach to Ethernet rates; adopt GCI’s proposal for a modest and limited increase in healthcare providers’ contributions; and move to a system of equal dollar reductions where necessary to meet the budgetary cap. INCOMPAS said the FCC’s proposals to control outlier costs using objective benchmarks and rate regulation should be reconsidered in favor of a market-based approach. INCOMPAS also said encouraging and enabling more competition will reduce inefficiencies in the RHC program. All replies available to date. FR, FR.

- Commissioner Clyburn spoke at a Voices for Internet Freedom Coalition event on March 8, 2018, to discuss Lifeline and inmate calling reform issues. She discussed the FCC’s changes to the Lifeline program. She also claimed there are now no comprehensive federal rules that protect inmates and their families, noting that some areas of the country have rates as high as $24 for a 15-minute call.
• The FCC and FTC issued a News Release on March 7, 2018, to announce they are co-hosting a Policy Forum on illegal robocalls on March 23, 2018, and a Stop Illegal Robocalls Technology Expo on April 23, 2018. The Policy Forum will discuss the regulatory challenges posed by illegal robocalls and what the FCC and FTC are doing to both protect consumers and encourage the development of private-sector solutions. The Technology Expo will feature technologies, devices, and applications to minimize or eliminate the illegal robocalls consumers receive. The FCC and FTC also released a Public Notice seeking exhibitors for their joint Stop Illegal Robocalls Expo.

• The FCC published a Notice in the Federal Register on March 7, 2018, seeking PRA comments on a new information collection pertaining to the recordkeeping requirements when carriers provide CPN of the calling party to law enforcement in connection with a threatening call and, as directed by law enforcement, to security personnel for the called party for the purpose of identifying the party responsible for the threatening call. The Commission amended § 64.1601(b) so the privacy requests would not apply when CPN delivery is made in connection with a threatening call. PRA comments are due May 7, 2018.

• AT&T met with FCC staff on March 1, 2018, to encourage the Commission to issue an FNPRM to expand the types of numbers that can be blocked if illegal robocall activity is detected and to propose a safe harbor if a legitimate call is inadvertently blocked. AT&T discussed the steps it takes before blocking any call, but suggested call blocking is only one of many tools to combat illegal robocalls and, by itself, cannot solve the problem. AT&T said it is important there be a robust trace-back process with vigorous and consistent enforcement action.

• The FCC published a Notice in the Federal Register on March 7, 2018, seeking PRA comments on removing business data services from the interstate tariffs of price cap ILECs that are no longer subject to price cap regulation and of CLECs within 36 months of the effective date of the April 28, 2017 Business Data Services Order, i.e., by August 1, 2020. Under this BDS Order, price cap ILECS are no longer subject to price cap regulation of their: packet-based BDS; TDM transport BDS; TDM BDS with bandwidth in excess of a DS3; DS1 and DS3 end user channel terminations; and other lower bandwidth TDM BDS, to the extent a price cap ILEC provides them in counties deemed competitive under the Commission's competitive market test or in counties for which the price cap ILEC had obtained Phase II pricing flexibility under the Commission’s prior regulatory regime. PRA comments are due by May 7, 2018.

• The FCC issued a Notice in the Federal Register on March 12, 2018, seeking PRA comments on an extension of a currently approved information collection associated with streamlined tariff filing requirements for LECs. The information collection requirements under this OMB control number are: electronic filing; carriers desiring tariffs proposing rate decreases to be effective in seven days must file separate transmittals; carriers must identify transmittals filed pursuant to the streamlined provisions of the Act; price cap LECs must file their TRPs prior to filing their annual access tariffs; petitions and replies; and standard protective orders. PRA comments are due May 11, 2018.

• The FCC announced its July Open Meeting has been rescheduled from July 10, 2018, to July 12, 2018.

• Chairman Pai announced Patrick Webre will serve as Chief of the Consumer and Governmental Affairs Bureau. Mr. Webre has been serving as the acting Chief of the CGB, and previously served as an Associate Bureau Chief and Chief Programs Officer in the CGB, Legal Advisor to the Chief of the Media Bureau, and an attorney in the Wireless Telecommunications Bureau.

• The Wireline Competition Bureau issued a Public Notice on March 7, 2018, announcing the LNPA Transition Oversight Manager will host the 26th LNP Administrator Transition Outreach and Education
Plan webcast on March 14, 2018. Interested parties may register and find additional details for the session at this link. Materials from prior TOEP sessions as well as other LNPA transition reference documents are available at this link.

- USTelecom spoke with Legal Advisors to Commissioners O'Rielly and Carr on March 1, 2018, to discuss the current status of the LNP Administrator transition. USTelecom said as the LNPA transition nears for the first regional cutover scheduled for April 8, 2018, it is concerned that discussions about the contingency rollback plan between the Transition Oversight Manager, NAPM, Neustar, and iconectiv have broken down despite what USTelecom says is the availability of a well-thought contingency roll back plan. USTelecom said it is critical that the contingency rollback plan be agreed upon by all parties to the transition as soon as possible.

- Neustar filed a letter on March 7, 2018, attaching a letter from the Transition Oversight Manager requesting that the NAPM correct and retract statements made in TOM's January 29, 2018 filing. The TOM stated that none of the statements in that filing should be read to state or imply an opinion that any party to the transition has acted in bad faith. Neustar claimed that due to the NAPM's failure to file the TOM's correction and retraction, the TOM authorized Neustar to file the correction.

- AT&T filed a letter on March 9, 2018, on the LNP Administrator transition. AT&T said a roll-back would only be necessary if a catastrophic event occurs, and said given the amount of testing that has been performed, the chances of this type of event is exceptionally low. AT&T said it has successfully tested its ability to move its connectivity from the new NPAC back to the Neustar NPAC in both production and test environments, and said it has confirmed AT&T's ability to re-submit transactions and said only a minimum number of ports would be impacted should something go wrong. AT&T claimed the manual roll-back plan developed by the Transition Oversight Manager and agreed to by the NAPM is a workable contingency roll-back approach, suggesting there is no reason to delay the transition.

- Verizon filed a letter on March 9, 2018, to express support for the NAPM's transition plan, including its plan for managing a manual rollback solution in the event that a catastrophic failure occurs after the cutover to iconectiv. Verizon said it has experienced positive results in all areas of testing, and said it has partnered with several major service providers to perform testing, all of which have been successful to date.

- Frontier filed a letter on March 9, 2018, to express its support for completing the LNPA transition without delay. Frontier said it and the industry have been working on a reliable contingency rollback plan, which has been developed by the Transition Oversight Manager and accepted by the NAPM. Frontier said it stands ready to proceed with the current rollback procedures as the transitions begin on April 8, 2018, and said it sees no reason to further delay the transition.

- Cloud Communications Alliance filed a letter on March 8, 2018, to urge the FCC to ensure there is a viable and tested contingency rollback plan before the LNPA Transition begins on April 8, 2018. CCA supported Chairman Pai's February 2, 2018 letter requiring further negotiation of a viable rollback plan. CCA did not agree with USTelecom that the manual contingency rollback plan, proposed by iconectiv and endorsed by NAPM, was a viable rollback plan, claiming that because it is a manual plan, it does not accommodate the limited resources of smaller providers. CCA urged the FCC to delay the implementation until such time that a proper rollback plan, including testing, is in place.

- The Wireline Competition Bureau issued a Public Notice on March 6, 2018, seeking comments on Advanced Telecom Solutions' application for authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. Comments are due March 21, 2018.

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Upcoming Filing Dates

- **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. 21** - Comments due on Advanced Telecom Solutions’ application for authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public 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. 27** - Replies due to oppositions to Petitions for Reconsideration of the Lifeline Reform [Order](#) filed by Lifewireless, 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](#)
• Apr. 10 - Replies due on Grand River Mutual Telephone Corporation and South Central Communications’ Petition for a study area waiver in Iowa. Public Notice

• Apr. 12 - PRA comments due on a revision of a currently approved information collection associated with: pole attachment complaint procedures; implementing LECs’ obligations to provide their competitors with dialing parity and non-discriminatory access to certain services and functionalities; ILECs’ duty to make network information disclosures; and numbering administration. Notice

• May 7 - PRA comments due on removing business data services from the interstate tariffs of price cap ILECs that are no longer subject to price cap regulation and of CLECs within 36 months of the effective date of the April 28, 2017 Business Data Services Order, i.e., by August 1, 2020. Notice

• May 7 - PRA comments due on a new information collection pertaining to the recordkeeping requirements when carriers provide CPN of the calling party to law enforcement in connection with a threatening call and, as directed by law enforcement, to security personnel for the called party for the purpose of identifying the party responsible for the threatening call. Notice

• May 11 - PRA comments due on an extension of a currently approved information collection associated with streamlined tariff filing requirements for LECs. Notice