

**NECA's Weekly Federal Regulatory Summary**

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

**March 16, 2020 HIGHLIGHTS**

- The FCC issued a [tentative agenda](#) for its March 31, 2020 Open Meeting. The FCC will consider five items, including: an [NPRM](#) that would propose to eliminate ex ante pricing regulation and require detariffing of various end-user charges associated with interstate access service, and prohibit carriers from separately listing these charges on customers' telephone bills; and an [order and FNPRM](#) on implementing the STIR/SHAKEN framework and proposes measures to combat illegal spoofing.
- The U.S. Court of Appeals for the D.C. Circuit [dismissed](#) a [petition for review](#) by the Irregulars, et al., of the FCC's separations freeze [order](#). The court said petitioners lack standing to challenge the order.
- The [order](#) adopting a two-phase reverse auction framework for the Rural Digital Opportunity Fund [is effective](#) April 9, 2020, except for certain amendments to sections 54.313, 54.316, 54.804 and 54.806 that involve reporting, compliance, and recordkeeping obligations, which are subject to OMB approval.
- The Wireline Competition Bureau [seeks comment](#) on the CAF II Coalition's [petition](#) for a rulemaking and [petition](#) for waiver regarding the letter of credit requirements for recipients of CAF Phase II support. Comments are due April 13, 2020; replies are due April 28, 2020
- The FCC [announced](#) the release of updated data on fixed broadband deployment and mobile voice and broadband deployment as of June 30, 2019, based on Form 477 data.
- The USDA [announced](#) it has [extended](#) the deadline for broadband [ReConnect Program](#) applications from March 16, 2020, until March 31, 2020.
- Chairman Pai [announced](#) the launch of the Keep America Connected pledge, which calls on broadband and telephone providers to promote connectivity for Americans impacted by the coronavirus pandemic.
- The Wireline Competition Bureau issued an [order designating issues for investigation](#) on the lawfulness of [tariff revisions](#) filed by Northern Valley Communications. NVC's direct case is due April 1, 2020; oppositions are due April 15, 2020.
- The FCC Office of Managing Director [announced](#) the proposed universal service contribution factor for the second quarter of 2020 will be 19.6 percent, down from 21.2 percent.
- NTCA [discussed](#) the reductions in access revenues that would arise out of any potential transition of access charges for 8YY traffic to bill-and-keep and the importance of explicit alternative cost recovery mechanisms for RLECs.
- President Trump [signed into law HR 4998](#), which prohibits the use of federal funds to purchase equipment from companies that pose a national security threat and creates a reimbursement program to remove and replace equipment in use that was manufactured by entities posing an unacceptable risk to national security. [Chairman Pai](#) issued a statement.

---

**Other Key Upcoming Dates**

- Mar. 19 - Replies are [due](#) on NECA's [proposed average schedule formulas](#).
- Mar. 27 - Comments [due](#) on the process of establishing RDOF Phase I auction application and competitive bidding procedures. Replies are due April 10, 2020.

Editor: [Shawn O'Brien](#) | Assistant Editor: [Libby Newson](#)

## USF Reform

- The [report and order](#) adopting a two-phase reverse auction framework for the Rural Digital Opportunity Fund was published in the [Federal Register](#) on March 10, 2020. The FCC will commit \$20.4 billion in high-cost universal service support to bring high-speed broadband service to unserved Americans. The order is effective April 9, 2020, except for amendments to sections 54.313(e)(annual reporting requirements for high-cost recipients); 54.316(a)(8), (b)(5), (c)(1)(broadband deployment reporting and certification requirements); 54.804 (a) through (c)(application process); and 54.806 (reporting obligations, compliance and recordkeeping), which are subject to OMB approval.
- The Wireline Competition Bureau issued a [public notice](#) on March 13, 2020, seeking comment on the CAF II Coalition's [petition](#) to initiate a rulemaking proceeding to update section 54.315(c) to align the letter of credit requirements for recipients of CAF Phase II support with those of Rural Digital Opportunity Fund support recipients. The Bureau also seeks comment on their [petition](#) requesting the Commission waive section 54.315(c) of its rules to allow recipients of universal service high-cost support awarded in the CAF Phase II auction to comply instead with the RDOF letter of credit provisions of section 54.804(c). Comments are due April 13, 2020; reply comments are due April 28, 2020.
- The Office of General Counsel issued a [public notice](#) on March 11, 2020, listing letters that were received by the FCC between January 24, 2020 and February 5, 2020, commenting on the draft RDOF order that was considered at the January 30, 2020 Open Meeting. The General Counsel said these letters, while ordinarily prohibited during the Sunshine Period, will be placed in the public record.
- NTCA and the National Rural Electric Cooperative Association [met with](#) Wireline Competition Bureau staff on March 5, 2020, to discuss the interplay of federal and state programs in connection with the eligibility of areas for RDOF support. They emphasized the importance of ensuring recipients of RDOF support can obtain appropriate financing through other means, including RUS programs, for construction and other upfront network deployment activities. They also urged the FCC to consider the ways in which the RDOF program and other federal and state programs might be leveraged in tandem to achieve better and faster broadband deployment than might otherwise be the case in the absence of such collaborative efforts.
- TDS Telecommunications and Matthey Consulting [met with](#) Wireline Competition Bureau on March 11, 2020, to discuss TDS' [comments](#) on the location adjustment procedures under the A-CAM program, in cases in which the number of actual locations is found to be less than the number of locations predicted to be available to serve by the A-CAM model. TDS said the FCC stated in the RDOF order, the costs of building and operating broadband networks are predominantly governed by the size and characteristics of the areas served rather than the precise number of locations. TDS discussed how this principle might apply in the context of A-CAM and expressed interest in working with the Commission and other stakeholders to develop an equitable approach to the issue of location shortfalls.
- Pineland Telephone Cooperative, West Carolina Rural Telephone Cooperative, and JSI [spoke with](#) legal advisors to Commissioners Carr, Starks, and O'Rielly on March 4, 2020, to urge expedited grant of Pineland's [petition for reconsideration](#) of the December 2018 report and order on A-CAM II support. Pineland claimed the petition demonstrates how the order creates arbitrary and irrational distinctions among rural customers funded under the A-CAM I versus A-CAM II and provides a solution by allowing A-CAM I companies the option of electing A-CAM II.
- The Alaska Telecom Association and GCI Communication [met with](#) Commissioner Starks' legal advisor on March 10, 2020, to urge the Commission to grant the application for review filed by GCI that seeks reversal of a Wireline Competition Bureau-level order denying a limited waiver of the 7.6 meter accuracy standard that applies to the network maps that Alaska Plan participants must file annually.
- Smith Bagley, Inc. [met with](#) advisors to Chairman Pai and Commissioners O'Rielly, Rosenworcel, Starks, and Carr, and Wireline Competition Bureau, Office of Economics and Analytics, Consumer and

Governmental Affairs Bureau staff on March 5 and 6, 2020, to discuss the 5G Fund. SBI said the 5G Fund should take into account extreme circumstances present on remote Tribal lands around the nation and offered suggested questions for the Commission to include in its upcoming NPRM.

[Back to Highlights](#)

## ICC

- The Wireline Competition Bureau issued an [order designating issues for investigation](#) on March 11, 2020, regarding the lawfulness of [tariff revisions](#) filed by Northern Valley Communications, a self-identified access-stimulating LEC. The Bureau designated for investigation whether the revisions establishing James Valley Cooperative Telephone as Northern Valley's intermediate access provider and providing that Northern Valley accepts financial responsibility only for James Valley's charges are consistent with the Act, the access arbitration [order](#), and FCC rules. Northern Valley's direct case is due April 1, 2020; oppositions to direct case are due April 15, 2020. *Ex parte* presentations will be accepted until May 28, 2020.
- NTCA [spoke with](#) Chairman Pai's senior counsel on March 5, 2020, to discuss 8YY reform. NTCA addressed the reductions in access revenues that would arise out of any potential transition of access charges for 8YY traffic to bill-and-keep. NTCA discussed the importance of explicit alternative cost recovery mechanisms for RLECs that depend upon such revenues to deliver universal service in rural areas. NTCA also discussed interconnection and network edge issues arising out of the transition of any transport rate elements to bill-and-keep, and suggested the FCC adopt a default rule that would maintain existing network edges and divisions of financial responsibility for the exchange of traffic with RLECs.
- The Ad Hoc Telecom Users Committee [spoke with](#) legal advisors to Chairman Pai and Commissioners Carr, Starks, O'Rielly, and Wireline Competition Bureau staff on March 5, 2020, to discuss 8YY. Ad Hoc suggested the Commission apply the same access charge regime to the originating end of toll-free calls and the terminating end of non-toll-free calls. Ad Hoc claimed the current 8YY originating access charge system incentivizes traffic pumping and asserted its members have seen an increase in the number of fraudulent calls terminating to their toll-free numbers. Ad Hoc asserted bill-and-keep remains the correct economic policy for access charges, including 8YY.
- AT&T and Verizon [met with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on March 4, 2020, claiming they continue to see a high volume of access stimulation traffic at Wide Voice switches in Miami and Los Angeles, and that Wide Voice's traffic forecasts show it intends to continue engaging in access stimulation. They also asserted several LECs identified in footnotes 26 and 276 of the access arbitration [order](#) have not filed notices on ceasing traffic pumping and have not filed revised tariffs, but are continuing to handle large volumes of traffic.

[Back to Highlights](#)

## Broadband

- The Office of Economics and Analytics, the Wireline Competition Bureau, and the Wireless Telecommunications Bureau issued a [public notice](#) on March 12, 2020, announcing the release of updated data on fixed broadband deployment and mobile voice and broadband deployment as of June 30, 2019, based on Form 477 data. Fixed deployment data, including revisions made by filers through February 25, 2020, is [available here](#) and mobile deployment data, including revisions made by filers through December 1, 2019, is [available here](#).
- The USDA [announced](#) on March 12, 2020, it has [extended](#) the deadline for broadband [ReConnect Program](#) applications from March 16, 2020, until March 31, 2020. In December 2019, the USDA [announced](#) it was making available an additional \$550 million in ReConnect funding in 2020.

- Chairman Pai [announced](#) on March 13, 2020, the launch of the Keep America Connected pledge, which calls on broadband and telephone service providers to promote connectivity for Americans impacted by the coronavirus pandemic. The pledge states providers: will not terminate service due to non-payment of bills, waive any late fees, and open their Wi-Fi hot spots to any Americans that need them. Commissioners [Rosenworcel](#) and [Starks](#) issued statements.
- The FCC issued a [public notice](#) on March 11, 2020, to announce the next meeting of the Task Force for Reviewing the Connectivity and Technology Needs of Precision Agriculture in the United States will be held March 25, 2020. At this meeting, the task force will: provide updates on its administration; review and discuss programs and policies relevant to the task force's duties; and discuss recent agricultural industrywide events related to broadband deployment and precision agriculture technologies. The meeting will be electronic in light of travel restrictions related to the ongoing increase in coronavirus cases.
- The FCC issued a [news release](#) on March 13, 2020, on Chairman Pai's announcing the working groups for the Task Force for Reviewing the Connectivity and Technology Needs of Precision Agriculture in the United States. The groups are: Mapping and Analyzing Connectivity on Agricultural Lands; Examining Current and Future Connectivity Demand for Precision Agriculture; Encouraging Adoption of Precision Agriculture and Availability of High-Quality Jobs on Connected Farms; and Accelerating Broadband Deployment on Unserved Agricultural Lands. The FCC also issued as [public notice](#) announcing the members appointed to the four working groups.
- The Senate [passed](#) the "[Broadband DATA Act](#)" on March 10, 2020, which requires the FCC to collect and disseminate granular broadband service availability data from wired, fixed-wireless, satellite, and mobile broadband providers. Sen. Shelley Moore Capito (R-W.Va.) issued a [press release](#) on the bill. The bill awaits approval by President Trump.
- The Senate Committee on Commerce, Science, and Transportation [approved](#) on March 11, 2020, [S. 1046](#), Advancing Critical Connectivity Expands Service, Small Business Resources, Opportunities, Access, and Data Based on Assessed Need and Demand (ACCESS BROADBAND) Act. The bill seeks to establish the Office of Internet Connectivity and Growth within the NTIA, and proposes this office track the construction, use of, and access to any broadband infrastructure built using any federal support in a central database. The bill will now be considered by the full Senate.
- The FCC issued a [public notice](#) on March 13, 2020, announcing the next meeting of the Technological Advisory Council will be held March 24, 2020. At this meeting, the TAC will hear presentations from its four working groups: 5G/IOT/V-RAN, Future of Unlicensed Operations, Artificial Intelligence, and 5G Radio Access Network Technology. The meeting is being moved to a wholly electronic format in light of travel restrictions affecting members of the TAC related to the ongoing increase in coronavirus (COVID-19) cases.
- Commissioner Starks [announced](#) on March 11, 2020, the postponement of a March 16, 2020 joint field hearing with the FTC in Detroit, Michigan, on promoting equity for 5G technology and big data, due to the COVID-19 virus.
- The Arizona Public Service Company, Evergy, Eversource Energy, et al. filed a [letter](#) on March 12, 2020, requesting the FCC to reject Crown Castle's [proposal](#) that the Commission clarify blanket prohibitions on specific types of utility pole attachments or attachments to specific areas of the pole and negotiated pole attachment agreement terms that conflict with the FCC's attachment rules violate section 224 of the Communications Act.

## Robocalls

- The Wireline Competition Bureau issued a [public notice](#) on March 11, 2020, announcing the opening of WC Docket No. 20-67, Implementation of TRACED Act Section 6(a) - Knowledge of Customers by Entities With Access to Numbering Resources.

- USTelecom filed a [letter](#) on March 6, 2020, submitting a proposal for STIR/SHAKEN implementation. USTelecom said the proposal describes steps a voice service provider must take in order to be considered as having implemented STIR/SHAKEN per the requirements of the TRACED Act. USTelecom said the proposal also contains a suggested framework for the establishment of an “appropriate robocall mitigation program” for any traffic that any voice service provider originates on its network and does not sign using the STIR/SHAKEN authentication protocol until STIR/SHAKEN or another call authentication framework can be implemented.
- USTelecom, AT&T, CenturyLink, Frontier, Twilio, Verizon and the SIP Forum [met with](#) Wireline Competition Bureau staff on March 2, 2020, to discuss implementation of the [TRACED Act](#). They asserted the Commission should not adopt workaround solutions that may have the unintended effect of discouraging adoption of the full STIR/SHAKEN standard or that may introduce unnecessary cost, complexity and risk for callers or voice service providers. They reiterated their [proposal](#) for the Commission to require the establishment of an “appropriate robocall mitigation program” for any traffic that any voice service provider originates on its network and does not sign using the STIR/SHAKEN authentication protocol until STIR/SHAKEN or another call authentication framework can be implemented.
- Comments were filed on March 11, 2020, on recommendations approved by the NANC on funding of the creation costs and on the fee structure for the reassigned numbers database. The [Credit Union National Association](#) cautioned against the use of call blocking technologies without the ability of legitimate callers to remove or correct the blocking or mislabeling of their calls. The [National Association of Federally-Insured Credit Unions](#) encouraged the FCC to provide an opportunity to comment on the appropriateness of a cost funding and fee structure when the FCC has meaningful information on the cost of the database. It also urged the FCC to exempt credit unions from the payment of fees for use of the database entirely, or, in the alternative, to reject the fee structure recommended by NANC and adopt a fee structure that does not unfairly burden credit unions. The [American Bankers Association](#) expressed support for the Commission’s decision to establish a single, comprehensive reassigned numbers database that is available to businesses on a voluntary basis to determine whether a customer’s wireless, wireline, or VoIP phone number has been permanently disconnected. [public notice](#) | [all comments available](#)
- Reply comments were filed on March 9, 2020, on the technical requirements for the reassigned numbers database, which was established in the 2018 robocall [order](#). [Interactive Marketing Solutions](#) suggested modeling the ongoing operation of the database after the wireless ported number database, which provides for the licensing and distribution of wireless TCPA related data to third-party caller service providers. The [American Financial Services Organization](#) supported the establishment of a single database that will contain reassigned number information from voice service providers. It said the database needs to have additional system query capability and that it must be able to process a high volume of queries submitted by callers. [public notice](#)
- INCOMPAS, Microsoft, et al. [met with](#) Consumer and Governmental Affairs Bureau staff on March 4, 2020, to discuss issues relating to the [public notice](#) seeking information for an upcoming staff report on the availability and effectiveness of call blocking tools and the impact of the Commission’s actions on mitigating illegal robocalls.

[Back to Highlights](#)

## Call Completion

- CarrierX, LLC, d/b/a FreeConferenceCall.com and Inteserra Consulting Group [spoke with](#) Wireline Competition Bureau Office of Economics and Analytics staff on March 11, 2020, claiming AT&T continues to block traffic and refuses to address ongoing call completion failures. They asserted AT&T’s actions are creating widespread, catastrophic call completion problems for the citizens and organizations across the U.S. that depend on conference calling services.

## Open Internet

- The Benton Institute for Broadband and Society, et al. filed a [motion](#) on March 12, 2020, seeking a 30-day extension to file comments and replies on the [public notice](#) seeking to refresh the record on restoring internet freedom and Lifeline. They asked that the due dates be extended until April 29, 2020, to file comments, and until May 29, 2020, to file replies.

## Universal Service

- The FCC Office of Managing Director released a [public notice](#) on March 13, 2020, announcing the proposed universal service contribution factor for the second quarter of 2020 will be 19.6 percent, down from the previous quarter's 21.2 percent.
- Commissioner Rosenworcel issued a [statement](#) on March 12, 2020, calling on the FCC to take action in response to COVID-19. She said the FCC should use its USF powers to work with health care providers to ensure availability of connectivity for telehealth services, and how to use its authority to provide wi-fi hotspots on loan for students whose schools have closed. Commissioner Starks [said](#) the FCC should deploy a connectivity and economic stimulus plan to leverage and expand the effectiveness of the billions it administers annually in existing universal service programs. He said the FCC should consider increasing the amount of money Lifeline provides for basic connectivity, raising data caps, and easing enrollment burdens.
- The Wireline Competition Bureau issued a [public notice](#) on March 12, 2020, to announce the E-Rate and rural health care program inflation-based caps for funding year 2020, which represent a 1.8 percent inflation-adjusted increase in each program cap from funding year 2019. The cap for the E-Rate program is \$4.2 billion and the cap for the rural health care program is \$605 million.
- The FCC released an [order](#) on March 13, 2020, on its own motion, granting waivers to fully fund all eligible rural health care program services for the current funding year, plus an additional \$42.19 million in funding. The total rural health care program demand for FY 2019 exceeded the \$677.29 million in previously available funding, and the order permits USAC to carry forward additional unused funds from prior years to cover this funding gap. Chairman Pai released a [statement](#).
- The Wireline Competition Bureau issued an [order](#) on March 12, 2020, denying a request for waiver of the three-year limitation on a multi-year funding commitment for a funding year 2015 funding commitment in the rural health care program filed by Finger Lakes Community Health, on behalf of the NY Community Broadband Partnership. The Bureau said FLCH did not demonstrate special circumstances that would compel grant of the waiver nor would grant of the waiver be in the public interest.
- The Wireline Competition Bureau issued a [public notice](#) on March 13, 2020, seeking comment on two petitions seeking study area waivers filed by West River Telecommunications Cooperative. The first petition seeks to expand its North Dakota Elgin and St. Anthony exchange areas to include portions of CenturyLink's Morristown and Mandan exchanges in North Dakota, respectively. The second, seeks to further expand its North Dakota Elgin exchange area to include other portions of CenturyLink's Morristown exchange in North Dakota. Comments are due April 13, 2020; reply comments are due April 28, 2020.
- Replies filed on March 12, 2020, on petitions for reconsideration of the November 2019 Lifeline [order](#) filed by [WTA](#), [TruConnect](#) and [Sprint](#). NTCA filed a [reply](#) on WTA's [petition for reconsideration](#), asserting as no oppositions have been filed, the Commission should direct revision of the policy requiring employees of ETCs to submit multiple pieces of personally identifiable information to USAC for registration and retention in the Representative Accountability Database. USTelecom filed a [reply](#) on WTA's [petition](#) for reconsideration. USTelecom supported WTA's position that the requirement for an ETC's directly-employed enrollment representatives to provide personally identifiable information in order to register with the Representative Accountability Database is intrusive and unnecessary to

prevent waste fraud and abuse. Sprint filed a [reply](#) on its [petition](#), asserting the record reflects strong support for its petition and said the FCC should reconsider its rule prohibiting commission-based payments by ETCs to third-party representatives. Sprint said, alternatively, the FCC should clarify this prohibition only applies to the ETCs themselves, and not to third parties, and does not bar payments to third-party verifiers. [public notice](#) | [all replies available](#)

- Replies are due March 16, 2020, on the re-establishment of a computer matching program the FCC and USAC will conduct with the Department of Housing and Urban Development to verify the eligibility of applicants to and subscribers of the Lifeline program. [notice](#)
- An FCC [notice](#) was published in the Federal Register on March 11, 2020, seeking Paperwork Reduction Act comments on a new FCC Form 5634, application for the Uniendo a Puerto Rico Fund and the Connect USVI Fund Stage 2 Fixed Support, The information collection requirements reported under this new collection are the result of the competitive proposal process adopted by the PR-USVI [order](#) to award support to winning applicants. PRA comments are due May 11, 2020.
- PRTC [met with](#) Wireline Competition Bureau staff on March 4, 2020, to discuss the Uniendo a Puerto Rico and Connect USVI Fund. PRTC discussed concerns with the December 2019 [public notice's](#) reliance on housing unit estimates as of July 2017. It urged the Commission to issue an updated public notice using 2018 housing data. PRTC also discussed concerns with the treatment for location adjustments to the *pro rata* adjustment framework in the Uniendo/USVI Connect proceeding as compared to the RDOF.
- Replies are due March 16, 2020, to oppositions to Viya's [petition for reconsideration](#) of the [public notice](#) announcing location counts and reserve prices for the Uniendo a Puerto Rico Fund and Connect USVI Fund Stage 2 fixed support competitive proposal process. [public notice](#), [FR](#)
- The Wireline Competition Bureau issued a [public notice](#) on March 13, 2020, directing USAC to extend the E-Rate filing deadline for Funding Year 2020 FCC Form 471, by an additional 35 days, until April 29, 2020. The Bureau said this extension is to minimize potential disruptions caused by COVID-19.
- EdLiNC sent a [letter](#) to Chairman Pai on March 12, 2020, to urge the Commission to temporarily waive relevant E-Rate program rules during the COVID-19 pandemic, to ensure all students have adequate home internet connectivity.
- Telcel Communications filed a [letter](#) on March 10, 2020, to supplement the record regarding the [petition](#) filed by Central Texas Telephone Cooperative, et al. that urged the Commission to initiate a rulemaking proceeding on E-Rate competitive bidding requirements. Telcel asserted the information it provided shows the duplicative fiber network project awarded USF funding in Region 14 of Texas is wasteful and an abuse of the E-Rate program.
- Replies are due March 16, 2020, on the [NPRM](#) on updating the Commission's suspension and debarment rules to make them consistent with OMB guidelines to better prevent bad actors from participating in USF programs, TRS programs and the National Deaf-Blind Equipment Distribution Program. [FR](#).

[Back to Highlights](#)

## Misc.

- The FCC issued a [tentative agenda](#) on March 10, 2020, for its March 31, 2020 Open Meeting. The FCC will consider: an [NPRM](#) that would propose to eliminate ex ante pricing regulation and require detariffing of various end-user charges associated with interstate access service, and prohibit carriers from separately listing these charges on customers' telephone bills. The FCC will also consider: a [report and order and FNPRM](#) that would adopt rules requiring originating and terminating voice service providers to implement the STIR/SHAKEN caller ID authentication framework in the IP portions of their networks, and propose additional measures to combat illegal spoofing, including measures to

implement portions of the TRACED Act; an [NPRM](#) that would seek comment on whether to modify the Commission's rules governing the use of distributed transmission systems by broadcast television stations; an [NPRM](#) that would seek comment on whether to update the methodology for determining whether a television broadcast station is "significantly viewed" in a community outside of its local market; and an [FNPRM and NPRM](#) that would seek comment on whether to modify the Commission's rules governing the resolution of program carriage disputes between video programming vendors and multichannel video programming distributors.

- Chairman Pai wrote a [blog post](#) on March 9, 2020, on items that will be considered at the FCC's March 31, 2020 Open Meeting. Pai said the FCC will consider a proposal to deregulate and detariff interstate end-user charges that remain subject to FCC regulation. Under this proposal, the FCC would prohibit all carriers from separately listing the subscriber line charge, the access recovery charge, the presubscribed interexchange carrier charge, the line port charge, and the special access surcharge on customers' bill. Pai said the FCC will also consider new rules requiring implementation of STIR/SHAKEN by June 30, 2021, and will seek public input on additional measures to combat spoofed robocalls. The FCC will also consider several Media Bureau items at the Open Meeting.
- The U.S. Court of Appeals for the D.C. Circuit issued an [opinion](#) on March 13, 2020, in the case addressing a [petition for review](#) filed by the Irregulars, et al., of the Commission's separations freeze [order](#). The court said petitioners have presented no evidence that the continuing application of the frozen rules has harmed them or is likely to harm them, and that they do not purchase telephone service from a provider whose rates are directly affected by the rules. The court dismissed the petitioners' claims because they lack standing to challenge the FCC's order.
- President Trump [signed into law](#) on March 12, 2020, [HR 4998, the Secure and Trusted Communications Network Act of 2019](#), which prohibits the use of federal funds to purchase equipment from companies that pose a national security threat and creates a reimbursement program to remove and replace equipment in use that was manufactured by entities posing an unacceptable risk to national security. [Chairman Pai](#) released a statement.
- The Public Safety and Homeland Security Bureau issued a [public notice](#) on March 13, 2020, seeking comment on the applicability of the recent [Secure and Trusted Communications Act of 2019](#) to the designation proceedings involving Huawei Technologies and ZTE Corporation. Comments are due March 27, 2020.
- USTelecom [met with](#) Chairman Pai's legal advisors on March 4, 2020, to discuss [its petition for reconsideration](#) of the supply chain [order](#). It reiterated its support for Commission efforts to ensure that public funds used as part of the USF are not used in a way that undermines or poses a threat to national security. USTelecom also discussed 8YY access reform and emphasized the need for adequate recovery as implicit network subsidies are removed. USTelecom also [spoke with](#) legal advisors to Commissioners Starks, Carr and O'Rielly regarding its petition for reconsideration.
- The FCC issued a [public notice](#) on March 12, 2020, announcing due to the increase in COVID-19 cases in the United States the FCC, effective immediately, will no longer allow visitors into its facilities, absent special permission from the Office of Managing Director. The FCC said no visitor will be granted such permission unless there is a clear operational necessity and this measure will remain in effect for the foreseeable future. In addition, the FCC advised employees that unless it is absolutely necessary for them to work from the office, they should telework until further notice.
- Reply comments were filed on March 13, 2020, on refreshing the record on ways to modernize and strengthen the truth-in-billing rules. [NTCA](#) said if the FCC believes that consumers need greater visibility into billing practices for their voice services, it should extend existing truth-in-billing rules applicable to fixed telephone service to interconnected VoIP service. NTCA said if the FCC does not extend such rules, then it should revoke all truth-in-billing rules applicable to traditional wireline voice service as well. [Enterprise Users Commenters](#) said the FCC's truth-in-billing rules should apply to interconnected VoIP service providers. It also said mandated and nonmandated government/regulatory charges should be charged in separate line items. [Cloud Communications Alliance](#) said the



Commission should decline to apply the truth-in-billing rules to interconnected VoIP services, and, instead, continue to handle problems and consumer complaints on a case-by-case basis. [public notice](#)

- INCOMPAS, Sonic, Smart Com, et al. [met the](#) Wireline Competition Bureau and Office of Economics and Analytics staff on March 4, 2020, to discuss the [NPRM](#) on updating its unbundling and resale rules. They asserted cable is not present throughout the territories they serve, even in urban areas as defined by the NPRM, and claimed where cable is present, cable is not necessarily available as a usable wholesale alternative.
- WorldNet Telecommunications [spoke with](#) legal advisors to Commissioners O’Rielly and Starks on March 10, 2020, to discuss its opposition to the FCC’s proposals in the [NPRM](#) to eliminate and/or further restrict access to unbundled network elements, specifically as those proposals relate to Puerto Rico. WorldNet asserted the unique circumstances presented in Puerto Rico, including its struggling economy, on-going hurricane recovery, and the unique and continuing need and demand for copper-based services weigh heavily in favor of not applying the FCC’s proposal in Puerto Rico or, at a minimum, deferring the implementation of those proposals at least five years. WorldNet also [spoke with](#) advisors to Chairman Pai and Commissioners Carr and Rosenworcel on March 11 and 12, 2020, to discuss the same issues.
- The Senate Committee on Appropriations’ Subcommittee on Financial Services and General Government held a [hearing](#) on March 10, 2020, on the FCC’s budget request for FY 2021. [Chairman Pai](#) and Commissioners [Rosenworcel](#), [Carr](#) and [Starks](#) testified.
- The House Committee on Appropriations held a [hearing](#) on March 11, 2020, on the FCC’s budget request for FY 2021. [Chairman Pai](#) and [Commissioner Rosenworcel](#) testified.
- The Senate Committee on Commerce, Science and Transportation held a [nominations hearing](#) on March 11, 2020, to consider several presidential nominations, including that of John Chase Johnson, for Inspector General of the FCC. Link to [Johnson’s testimony](#).
- The Wireline Competition Bureau issued a [public notice](#) on March 13, 2020, seeking comment on the auction of toll free numbers in the 833 area code. The Bureau seeks comment on the outcomes of the auction, lessons learned, and future recommendations for toll free number assignment methodologies. The FCC [established](#) the auction as an experiment in using competitive bidding as a way to assign toll free numbers. Comments are due April 13, 2020.
- An FCC [notice](#) was published in the Federal Register on March 11, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with numbering audits. The FCC said the random audits are conducted on the carriers that use numbering resources in order to verify the accuracy of numbering data reported on FCC Form 502, and to monitor compliance with FCC rules, orders and applicable industry guidelines. PRA comments are due May 11, 2020.
- An FCC [notice](#) was published in the Federal Register on March 11, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with the prevention of the unauthorized change by telecommunications carriers of consumers’ selections of telecommunications service providers. PRA comments are due April 10, 2020.
- The Wireline Competition Bureau issued a [public notice](#) on March 11, 2020, granting, subject to condition, a section 214 application that requested the transfer of assets of Buggs Island Telephone to EMPOWER.

[Back to Highlights](#)

## Upcoming Filing Dates

- Mar. 19 - Replies due on NECA’s December 2019 [proposed average schedule formulas](#). [public notice](#)

- Mar. 20 - Replies due on the [NPRM](#) on updating its unbundling and resale rules to reflect the marketplace realities of intermodal voice and broadband competition. [order](#), [FR](#)
- Mar. 23 - PRA comments are due on an extension of a currently approved information collection regarding access to numbering resource application information. [FCC notice](#)
- Mar. 23 - PRA comments are due on an extension of a currently approved information collection associated with Parts 54 and 69 filing requirements for regulation of interstate services of non-price cap ILECs and IXCs. [notice](#)
- Mar. 23 - Comments due on [CenturyLink's](#) application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service.
- Mar. 23 - Comments due on [Quality Voice and Data's](#) application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service.
- Mar. 24 - PRA comments due on an extension of a currently approved information collection associated with payphone compensation. [FCC notice](#)
- Mar. 26 - Comments due on a population distribution methodology for estimating the number of Alaskans who receive mobile service within census blocks in remote areas. Reply comments are due April 10, 2020. [public notice](#)
- Mar. 27 - Comments due on the process of establishing pre-and post-auction application procedures and competitive bidding procedures for Phase I of the Rural Digital Opportunity Fund. Replies are due April 10, 2020. [public notice](#)
- Mar. 27 - Comments due on the applicability of the recent [Secure and Trusted Communications Act of 2019](#) to the designation proceedings involving Huawei Technologies and ZTE Corporation. [public notice](#)
- Mar. 30 - PRA comments due on a revision of a currently approved information collection associated with changes in reporting and recording keeping requirements for FCC forms 460, 461, 462, 463, 465, 3466 and 467 (rural health care.) [FR](#)
- Mar. 30 - Comments due on refreshing the record in the Restoring Internet Freedom and Lifeline proceedings. The Bureau seeks comment on how changes adopted in the RIF [order](#) might affect: public safety; the regulation of pole attachments in states subject to federal regulation; and the Lifeline program. Replies are due April 29, 2020. [public notice](#)
- Apr. 1 - Northern Valley's direct case due regarding the lawfulness of [tariff its revisions](#). Oppositions to direct case are due April 15, 2020. [order](#)
- Apr. 3 - Comments due on applications for review of decisions on the rural health care program filed by the [Tanana Chiefs Conference](#) and [ENA Healthcare Services](#). Replies are due April 20, 2020. [public notices](#)
- Apr. 3 - Comments due on the state of competition in the communications marketplace for its second communications marketplace report. Replies are due May 13, 2020. [public notice](#)
- Apr. 6 - PRA comments due on a revision of a currently approved information collection on FCC Form 183, the application to participate in the Rural Digital Opportunity Fund auction. [notice](#)
- Apr. 10 - Replies due on a population distribution methodology for estimating the number of Alaskans who receive mobile service within census blocks in remote areas. [public notice](#)

- Apr. 10 - Replies due on the process of establishing pre-and post-auction application procedures and competitive bidding procedures for Phase I of the Rural Digital Opportunity Fund. [public notice](#)
- Apr. 10 - PRA comments on an extension of a currently approved information collection associated with the prevention of the unauthorized change by telecommunications carriers of consumers' selections of telecommunications service providers. [notice](#)
- Apr. 13 - Comments due on the CAF II Coalition's [petition](#) for rulemaking and [petition](#) for waiver regarding the letter of credit requirements for recipients of CAF Phase II support. Reply comments are due April 28, 2020. [public notice](#)
- Apr. 13 - Comments due on two petitions seeking study area waivers filed by West River Telecommunications Cooperative. Reply comments are due April 28, 2020. [public notice](#)
- Apr. 13 - Comments due on the outcomes of the auction of toll free numbers in the 833 area code, lessons learned, and future recommendations for toll free number assignment methodologies. [public notice](#)
- Apr. 14 - PRA comments due on an extension of a currently approved information collection relating to the monitoring of USF support mechanisms. PRA comments are due April 14, 2020. [FCC notice](#)
- Apr. 15 - Oppositions due to Northern Valley's direct case due regarding the lawfulness of [tariff its revisions. order](#)
- Apr. 20 - PRA comments due on a new information collection as a result of the December 12, 2018 [order](#) on robocalls, which established a database to enable callers to verify whether a telephone number has been disconnected before calling that number. [notice](#)
- Apr. 20 - PRA comments due on a revision to a currently approved information collection associated with FCC Forms 481, 497, 555, 5629, 5630 and 5631, as a result of the November 2019 Lifeline [order. FR](#)
- Apr. 20 - Responses due on assessing parties' continuing interests in [petitions for reconsideration](#) of various aspects of the intercarrier compensation provisions of the 2011 USF/ICC Transformation Order. [Federal Register](#), [public notice](#)
- Apr. 20 - Replies due on applications for review of decisions on the rural health care program filed by the [Tanana Chiefs Conference](#) and [ENA Healthcare Services](#). [public notices](#)
- Apr. 22 - Deadline for ETCs to report on the extent to which their networks contain or use potentially prohibited equipment or services provided by Huawei or ZTE and the costs associated with removing such equipment and replacing it with equivalent equipment. [public notice](#)
- Apr. 28 - Replies due on the CAF II Coalition's [petition](#) for rulemaking and [petition](#) for waiver regarding the letter of credit requirements for recipients of CAF Phase II support. [public notice](#)
- Apr. 28 - Replies due on two petitions seeking study area waivers filed by West River Telecommunications Cooperative. [public notice](#)
- Apr. 29 - Replies due on refreshing the record in the Restoring Internet Freedom and Lifeline proceedings. The Bureau seeks comment on how changes adopted in the RIF [order](#) might affect: public safety; the regulation of pole attachments in states subject to federal regulation; and the Lifeline program. [public notice](#)
- May 4 - PRA comments due on a revision of a currently approved information collection associated with rate-of-return carrier universal service reporting requirements filed on FCC Forms 507, 508 and 509. [FR](#)

- May 4 - PRA comments due on a revision of a currently approved information collection associated with high-cost universal service support filed on FCC Form 481. [FR](#)
- May 4 - PRA comments due on an extension of a currently approved information collection on IXC information disclosure requirements, internet posting requirements, recordkeeping requirements, and annual certification requirements. [notice](#)
- May 11 - PRA comments on a new FCC Form 5634, application for the Uniendo a Puerto Rico Fund and the Connect USVI Fund Stage 2 Fixed Support. [notice](#)
- May 11 - PRA comments on an extension of a currently approved information collection associated with numbering audits. [notice](#)
- May 13 - Replies due on the state of competition in the communications marketplace for its second communications marketplace report. [public notice](#)

[Back to Highlights](#)

Editor: [Shawn O'Brien](#) | Assistant Editor: [Libby Newson](#)