

NECA's Weekly Federal Regulatory Summary

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

March 23, 2020 HIGHLIGHTS

- The Wireline Competition Bureau, the Rural Broadband Auctions Task Force, and the Office of Economics and Analytics [announced](#) the release of the preliminary list of census blocks and a map of areas that have been deemed initially eligible for the Rural Digital Opportunity Fund Phase I auction. Challenges are due April 10, 2020.
- Chairman Pai [announced](#) a [total of 390 broadband](#) and telephone service providers have taken his [Keep Americans Connected Pledge](#), which calls on broadband and telephone service providers to promote connectivity for Americans impacted by the coronavirus pandemic.
- Commissioner O'Rielly [offered suggestions](#) on the ReConnect Program.
- President Trump [renominated](#) Commissioner O'Rielly for another term as Commissioner. If O'Rielly is reconfirmed, the term is for five years, from July 1, 2019.
- The Wireline Competition Bureau, RBTF and OEA [provided](#) guidance to applicants regarding the eligibility of non-US banks to issue letters of credit for universal service competitive bidding mechanisms.
- The Wireline Competition Bureau [seeks comments](#) on Skybeam's [request](#) for waiver of the letter of credit rules for rural broadband experiments support recipients, and instead allow Skybeam to comply with the RDOF LOC provisions. Comments are due April 13, 2020; replies are due April 28, 2020.
- The Wireline Competition Bureau, RBTF, and OEA [authorized](#) \$521,000 in CAF Phase II support to Red Spectrum Communications.
- The FCC [denied](#) GCI's [application for review](#) of a Wireline Bureau [order](#) denying ATA's [limited waiver](#) of the 7.6 meter accuracy standard that applies to the network maps that Alaska Plan participants must file annually.
- [CarrierX](#) and [AT&T](#) filed comments on Inteliquent's [petition](#) for waiver of the access stimulation definition in Part 61, due to the COVID-19 pandemic. Native America Telecom- Pine Ridge also filed a [petition](#) for waiver of the definition.
- [Reply comments](#) were filed the [NPRM](#) on updating its unbundling and resale rules to reflect the marketplace realities of intermodal voice and broadband competition.

Other Key Upcoming Dates

- Mar. 27 - Comments [due](#) on the process of establishing RDOF Phase I auction application and competitive bidding procedures. Replies are due April 10, 2020.

USF Reform

- The Wireline Competition Bureau, the Rural Broadband Auctions Task Force, and the Office of Economics and Analytics issued a [public notice](#) on March 17, 2020, announcing the release of the preliminary list of census blocks and a map of areas that have been deemed initially eligible for the Rural Digital Opportunity Fund Phase I auction. They also released a list of the associated census block groups and reserve prices, and a list of the associated census tracts and reserve prices. The list of census blocks, census block groups, and census tracts can be found [here](#), and the map can be found [here](#). The Wireline Bureau is conducting a limited challenge process to give parties an opportunity to identify by April 10, 2020 census blocks that fall into one of the three following categories: FCC Form 477 filers; subsidized census blocks; and rate-of-return carriers. To identify the preliminary eligible areas, the Bureau has used the Connect America Cost Model with updated coverage data using the most recent publicly available Form 477 data.
- The [public notice](#) that launches the process of establishing pre-and post-auction application procedures and competitive bidding procedures for Phase I of the Rural Digital Opportunity Fund, was published in the [Federal Register](#) on March 17, 2020. Phase I of the auction will award up to \$16 billion over 10 years to service providers that commit to offer voice and broadband services to fixed locations in eligible unserved high-cost census blocks. The FCC said it expects bidding to begin on October 22, 2020. Comments are due March 27, 2020; replies are due April 10, 2020.
- The Wireline Competition Bureau, the Rural Broadband Auctions Task Force and the Office of Economics and Analytics issued a [public notice](#) on March 20, 2020, providing guidance to applicants for and recipients of universal service support allocated through a competitive bidding mechanism regarding the eligibility of non-United States banks to issue letters of credit. They said a non-U.S. bank that has a branch office located in New York City, New York and will accept a letter of credit draw certificate from USAC via overnight courier, in addition to in-person presentations, will be considered qualified to issue letters of credit if the bank also meets the Commission's other non-U.S. bank eligibility requirements. The FCC requires that before being authorized to receive support allocated through its universal service bidding mechanisms an applicant must obtain a letter of credit issued by a qualified bank to protect the public's funds.
- Chairman Pai sent [letters](#) to Sens. John Boozman (R-Ark.), Kevin Cramer (R-N.D.), et al. on March 2, 2020, in response to their letter on the letter of credit requirement for the Rural Digital Opportunity Fund. Pai said the FCC changed the LOC requirement to reduce costs to carriers by up to 80% in a given year from those initially proposed while still protecting scarce federal funds in the event of non-compliance. Chairman Pai also sent a [letter](#) to Rep. Jim Himes (D-Conn.) on March 2, 2020, in response to his letter regarding the LOC requirement for the RDOF.
- The Wireline Competition Bureau, the Rural Broadband Auctions Task Force, and the Office of Economics and Analytics issued a [public notice \(news release\)](#) on March 16, 2020, authorizing \$521,000 in CAF Phase II support to Red Spectrum Communications. The FCC said Red Spectrum has committed to providing broadband at speeds of at least 25/3 Mbps to an estimated 185 unserved rural homes and businesses in Idaho, some of which are in tribal areas.
- The Wireline Competition Bureau issued a [public notice](#) on March 17, 2020, seeking comment on Skybeam's [request](#) that the Commission waive the letter of credit rules for rural broadband experiments support recipients, and instead allow Skybeam to comply with the recently adopted RDOF letter of credit provisions of section 54.804(c). Comments are due April 13, 2020; reply comments are due April 28, 2020.
- The FCC issued a [memorandum opinion and order](#) on March 18, 2020, denying GCI's [application for review](#) that sought reversal of a Wireline Competition Bureau [order](#) denying ATA's [limited waiver](#) of the 7.6 meter accuracy standard that applies to the network maps that Alaska Plan participants must file annually. The FCC affirmed the 2019 waiver order, and said it properly denied a waiver because the request failed to provide facts and circumstances warranting relief.

- Pineland Telephone Cooperative, West Carolina Rural Telephone Cooperative, and JSI [spoke with](#) Commissioner Rosenworcel's chief of staff on March 12, 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.
- Redwire filed a [petition for waiver](#) on March 18, 2020, of the March 19, 2020 [deadline](#) for it to submit its letter of credit and bankruptcy opinion letter to USAC in order to be authorized for CAF Phase II support. Redwire requests an extension of 30 days, until April 20, 2020, to submit these documents, and said the COVID-19 pandemic situation warrants a deviation from the deadline.
- Charter Communications [spoke with](#) Office of General Counsel staff on March 17, 2020, to state it is important to stretch the Commission's USF dollars as far as possible by preventing Rural Digital Opportunity Fund money from being used to overbuild areas that will have broadband in the near term.
- Chairman Pai sent [letters](#) to Sens. Marsha Blackburn (R-Tenn.), John N. Kennedy (R-La.), et al. on March 6, 2020, in response to their letter regarding the FCC's staff report on the investigation into the Mobility Fund Phase II coverage maps and the announcement on establishing a new 5G Fund for rural America. Pai said the new 5G Fund would make available to carriers up to \$9 billion in high-cost USF support over 10 years to deploy advanced 5G mobile wireless services in rural America and would set aside at least \$1 billion specifically for deployments to support precision agriculture needs. Pai also said he expects the FCC will seek comment on how to incorporate coverage data available into the 5G Fund.

[Back to Highlights](#)

ICC

- The FCC issued a [small entity compliance guide](#) on March 16, 2020, on the September 2019 [report and order](#) that adopts reforms to eliminate access arbitrage schemes. The guide provides information on compliance, reporting and recordkeeping requirements and effective and implementation dates.
- The Wireline Competition Bureau issued a [protective order](#) on March 19, 2020, in the proceeding [investigating](#) the lawfulness of [tariff revisions](#) filed by Northern Valley Communications, a self-identified access-stimulating LEC. The Bureau sets forth procedures to limit access to proprietary or confidential information that may be filed in this proceeding.
- USTelecom filed a [letter](#) on March 13, 2020, on its [plan](#) for transitioning and transforming 8YY access charges in order to eliminate incentives for access arbitrage. USTelecom reiterated the 8YY access charge transition should begin on January 1, 2021, and that this date is the first feasible implementation date of the "step ones" of its proposal. USTelecom also proposed the interval between step one and step two for end office charges and database query charges should be 18 months.
- Onvoy, d/b/a Inteliquent filed a [petition](#) on March 17, 2020, for a temporary waiver of section 61.3(bbb)(1)(ii), such that Inteliquent will not be deemed to be engaged in "access stimulation" by virtue of terminating volumes of inbound traffic that exceed outbound traffic by a ratio of 6:1 or greater in a given month while the waiver is in effect. Inteliquent seeks a waiver through June 1, 2020, renewable by the Wireline Competition Bureau for 60-day intervals as events warrant. Inteliquent said this waiver will allow it to continue to support a massive surge in demand for conference calling services as the American people move en masse from work in the office to remote work during the COVID-19 pandemic.
- Comments were filed on March 20, 2020, on Inteliquent's [petition](#) for waiver of section 61.3(bbb)(1)(ii), such that Inteliquent will not be deemed to be engaged in "access stimulation" by virtue of terminating

volumes of inbound traffic that exceed outbound traffic by a ratio of 6:1 or greater in a given month while the waiver is in effect. Inteliquent said this waiver will allow it to continue to support a massive surge in demand for conference calling services during the COVID-19 pandemic. [CarrierX](#) supported Inteliquent's waiver in part but urged the Commission for a waiver to be granted for all conferencing traffic transmitted by all carriers. [AT&T](#) took no position on the waiver request, but suggested that in anticipation that other carriers may file similar petitions, the Commission make clear that all traffic measurements that were calculated before the onset of the pandemic crisis are valid and if carriers' traffic previously exceeded the 6:1 ratio set out in the Commission's rules, they are indeed an access stimulator under the rules.

- Native America Telecom – Pine Ridge filed a [petition](#) on March 18, 2020, seeking a temporary waiver of the access stimulation definition in section 61.3(bbb)(l)(ii). NATPR asked, due to the COVID 19 pandemic, the FCC require telecommunications carriers to augment capacity and route traffic in a manner that avoids call blocking and congestion, and waive the interstate terminating-to-originating traffic ratio of at least 6:1 in an end office in a calendar month.

[Back to Highlights](#)

Broadband

- Chairman Pai [announced](#) on March 16, 2020, 116 more broadband and telephone service providers have taken his [Keep Americans Connected Pledge](#), which calls on broadband and telephone service providers to promote connectivity for Americans impacted by the coronavirus pandemic. A total of 185 companies have now taken the pledge.
- Chairman Pai issued a [statement](#) on March 19, 2020, announcing 205 additional broadband and phone service providers have taken the Keep Americans Connected Pledge, bringing the total number of companies to 390. Pai said by taking the pledge, each of these companies has committed for the next 60 days to: not terminate service to any residential or small business customers because of their inability to pay their bills due to the disruptions caused by the coronavirus pandemic; waive any late fees that any residential or small business customers incur because of their economic circumstances related to the coronavirus pandemic; and open its Wi-Fi hotspots to any American who needs them.
- Chairman Pai issued a [statement](#) on March 18, 2020, to commend broadband and telephone service providers that have responded to his call to take the Keep Americans Connected Pledge and have gone even further to enhance Americans' connectivity during the coronavirus pandemic. He said companies have increased speeds for low-income customers, lifted data caps, and have offered 60 days of free service for new low-income customers and students. He provided a list of companies that are taking additional steps at no extra cost to consumers.
- Commissioner O'Rielly sent a [letter](#) to Chad Rupe, Administrator of the Rural Utilities Service, USDA, on March 16, 2020, to offer suggestions on the ReConnect Program. O'Rielly expressed concern with certain aspects second round's framework, including the decision to lower the threshold at which an area must be unserved to be eligible for a 100 percent grant from 100 percent unserved to 90 percent unserved, and the decision to disproportionately favor fiber technology in the application scoring process. He also asserted there is a lack of consistent and transparent practices governing the challenge process, and an absence of comprehensive measures to exclude from eligibility areas already subject to enforceable deployment obligations. He asked the RUS to consider appropriate programmatic revisions as it awards further funding or designing future program rounds.
- Microsoft [spoke with](#) Commissioner Starks' chief of staff on March 13, 2020, to discuss actions that could be taken in response to the Covid-19 pandemic. It suggested the Commission: grant an E-Rate [petition](#) clarifying that schools can wirelessly extend E-Rate subsidized connections to students at home; proceed with proposed changes to technical rules for TV white space devices; and grant a [petition for waiver](#) of Citizen Broadband Radio Service transition requirements.

- The Edison Electric Institute [spoke with](#) advisors to Chairman Pai and Commissioner Carr, and Wireline Competition Bureau and Wireless Telecommunications Bureau staff on March 12, 2020, to urge the Commission to deny CTIA's [petition for declaratory ruling](#). EEI claimed that a full-scale expansion of the FCC's pole attachment rules, as CTIA demands, would encumber the development of a free market for light pole infrastructure.

Robocalls

- The FCC issued an [advisory](#) on March 20, 2020, to announce the launch of its COVID-19 Consumer Warnings and Safety Tips webpage, to alert consumers to the proliferation of scam phone calls and texts related to the coronavirus pandemic. The webpage can be [found here](#)
- The FCC placed an [item on circulation](#) on March 13, 2020, entitled "Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)."
- Neustar [spoke with](#) Wireline Competition Bureau and Consumer and Governmental Affairs Bureau staff on March 17, 2020, to discuss Neustar's role in call authentication and robocall mitigation solutions. It also provided a presentation to show how it has worked with industry to ensure STIR/SHAKEN interoperability, among other things.
- The American Bankers Association, et al. [spoke with](#) advisors to Chairman Pai and Commissioners O'Rielly, Rosenworcel, and Carr on March 11 and 13, 2020, to discuss robocalls. They reiterated points made in their March 4, 2020 [ex parte](#), which suggested the Commission require voice service providers to provide notice to the caller when the provider or its third-party call-blocking partner has placed a derogatory label on the business' outbound calling number or blocked calls placed from that number.
- The American Bankers Association, et al. [spoke with](#) Commissioner Starks' advisor on March 16, 2020, to discuss robocalls. They reiterated points made in previous [ex parte filings](#) that summarized the firsthand and statistical evidence in the record demonstrating the substantial blocking and mislabeling of lawful calls, including calls implicating public safety.
- The Cloud Communications Alliance [spoke separately with](#) Commissioner Carr's legal advisor and Wireline Competition Bureau staff on March 16, 2020, to discuss the draft [report and order and FNPRM](#) on STIR/SHAKEN, which will be considered at the FCC's March 31, 2020 Open Meeting. The Cloud Communications Alliance [spoke with](#) legal advisors to Chairman Pai and Commissioners Starks and Rosenworcel and the Wireline Competition Bureau associate bureau chief on March 16, 2020, to discuss the same issues.
- ZipDX [met with](#) Commissioner Rosenworcel's chief of staff and Enforcement Bureau staff on March 13 and 17, 2020, to discuss the robocall traceback process.

[Back to Highlights](#)

Universal Service

- The Wireline Competition Bureau released an [order](#) on March 17, 2020, waiving the Lifeline recertification and reverification requirements for 60 days, due to the COVID-19 pandemic. The Bureau also waived for 60 days, the 2019 Lifeline order's requirement that all ETC enrollment representatives register with USAC. ([news release](#))
- The Wireline Competition Bureau released an [order](#) on March 18, 2020, waiving the gift rules applicable to the rural health care and E-Rate programs until September 30, 2020. The Bureau said this will enable service providers to offer, and RHC and E-Rate program participants to solicit and accept, improved broadband connections or equipment for telehealth or remote learning during the COVID-19 outbreak without running afoul of Commission rules. Commissioner Rosenworcel issued a [statement](#). ([news release](#))

- Sens. Amy Klobuchar (D-Minn.), Gary Peters (D-Mich.) and John Tester (D-Mont.) sent a [letter](#) to Chairman Pai on March 19, 2020, to urge the FCC to take immediate action to ensure that all K-12 students in the U.S. have access to the internet so that they can continue learning while schools are closed in response to the COVID-19 pandemic. They asked the FCC to create a consumer-friendly web portal, searchable by region, with the latest information about how consumers can get and stay connected, including contacts for telecommunications providers, links to maps of publicly available Wi-Fi hotspots, and information about federal and corporate assistance to those without broadband internet, and to work with media outlets to distribute this information to those who are not already online.
- Sens. Richard Blumenthal (D-Conn.), Edward Markey (D-Mass.), Michael Bennet (D-Colo.) and Brian Schatz (D-Hawaii) sent a [letter](#) to Chairman Pai on March 19, 2020, to urge the Commission to ensure no American is cut off from the Lifeline program as a result of the COVID-19 pandemic. They said Congress has invested the FCC with emergency powers to waive, suspend, or revise its policies and regulations for challenging times and the Commission should use these authorities to take every action necessary to ensure that Lifeline is available and fits the needs of subscribers.
- Twenty-six senators [sent a letter](#) to Chairman Pai on March 18, 2020, to urge the FCC to increase subsidies to health care providers through the rural health care program. They said the funding would ensure that providers have the resources they need to deliver and expand telehealth services for rural communities during the COVID-19 pandemic.
- An FCC [notice](#) was published in the Federal Register on March 19, 2020, to correct a final rule in the August 2019 rural health care [order](#), originally published in the [Federal Register](#) on October 11, 2019, which omitted the new heading update for Subpart G (Universal Service for Rural Health Care Program) in the rules section. The correction is effective March 19, 2020.
- An FCC [notice](#) was published in the Federal Register on March 20, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with certain Part 54 ETC designation requirements. PRA comments are due May 19, 2020.
- USTelecom, AT&T, CenturyLink and Alaska Communications [spoke with](#) Wireline Competition Bureau staff on March 16, 2020, regarding USTelecom's [petition for reconsideration](#) of the August 2019 rural health care [order](#). USTelecom discussed the time sensitive nature of the need to reconsider and/or clarify the certification rule related to commissioned sales agents which goes into effect on July 1, 2020. They said if the requirement is not rescinded, the Commission should clarify that the certification only applies prospectively.
- Valley Telephone Cooperative, Totelcom Communications, et al. [spoke with](#) Commissioner Rosenworcel's legal advisor on March 13, 2020, regarding the E-Rate [petition for rulemaking](#) on E-Rate competitive bidding requirements and the [ex parte](#) filed by Totelcom on the petition. They urged the Commission to release a notice of proposed rulemaking to address waste concerns in the program. They also spoke with [Commissioner O'Rielly](#) and his legal advisor and Commissioners [Starks'](#) legal advisor to discuss the same issues.
- The Schools, Health, & Libraries Broadband Coalition sent a [letter](#) to Chairman Pai and Commissioners Rosenworcel, O'Rielly, Carr, and Starks on March 17, 2020, to recommend actions the Commission can take to ensure all Americans have access to connectivity during the COVID-19 pandemic. It suggested extending the filing window for rural health care applicants for FY2020, clarifying schools and libraries can share their wi-fi networks with the community and not lose E-Rate funding, and encouraging broadband providers to open their Wi-Fi routers for use by any residential users.
- The American Library Association sent a [letter](#) to Chairman Pai and Commissioners O'Rielly, Rosenworcel, Carr and Starks on March 19, 2020, to urge the Commission to use its authority to immediately address the digital divide caused by work and school closures and social-distancing

requirements due to the COVID 19 pandemic. It asked the Commission to: clarify that public libraries can allow community access to their Wi-Fi networks and use the Wi-Fi enabled bookmobile or techmobile as a community hotspot without jeopardizing E-Rate funding; allow libraries to increase their broadband capacity immediately without the required service substitution required under E-Rate rules; and provide a temporary waiver of E-Rate rules that restrict broadband services to library (and school) property.

- Advanced Data Services sent a [letter](#) to Kris Monteith, Chief, Wireline Competition Bureau on March 19, 2020, to express support for the [SHLB Coalition's](#) request for an extension of the FY2020 rural health care filing window.
- TruConnect [spoke with](#) Commissioner O'Rielly on March 13, 2020, to offer recommendations to meet the needs of Americans impacted by the COVID-19 virus. TruConnect suggested, among other things, freezing Lifeline subscriber recertifications and 30-day non-usage requirements, and expanding data availability to Lifeline subscribers by increasing reimbursements to Lifeline providers in all states for 6 to 9 months to reimburse for additional data ETCs provide to subscribers.
- The National Lifeline Association [spoke with](#) Wireline Competition Bureau staff on March 13, 2020, to discuss potential responses by Lifeline service providers and the Commission to assist low-income Americans with voice and broadband communications during COVID-19 pandemic. It recommended relief from the Lifeline recertification, reverification and non-usage de-enrollment requirements to avoid disconnecting low-income Americans from critical communications at this time. NLA also discussed the need for additional voice minutes and broadband data, in particular for connecting to healthcare providers and to support remote learning.
- Infinity Communications and Consulting [spoke with](#) Wireline Competition Bureau staff on March 12, 2020, to respond to questions on its [petition for reconsideration](#) of the decision to base student counts on full-time enrollment only contained in the E-Rate category two [report and order](#), and to provide additional details about concerns expressed in the petition.
- An FCC [notice](#) was published in the Federal Register on March 17, 2020, announcing the re-establishment of a computer matching program the FCC and USAC will conduct with agencies from the states of Colorado, Mississippi, New Mexico and Utah to verify the eligibility of applicants to and subscribers of the Lifeline program. Comments are due on April 16, 2020. This program will begin April 19, 2020, unless comments are received that require a contrary determination, and will conclude on October 18, 2021.
- NTCA filed a [letter](#) on March 16, 2020, to urge the FCC to consider delaying or tolling the upcoming deadline for submission of personally identifiable information for purposes of registration in the Lifeline Representative Accountability Database. NTCA said service providers are currently focused on a number of operational issues, and that such a delay or tolling of the deadline would permit companies to continue to interact with Lifeline-related systems as they do now without potential disruption.
- TruConnect [spoke with](#) Wireline Competition Bureau staff on March 11, 2020, to discuss the FCC's upcoming telemedicine pilot, and 2021 Lifeline minimum service standards.
- 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](#)
- AeroNet filed a [letter](#) on March 16, 2020, to ask the FCC to modify the location adjustment process for the Uniendo a Puerto Rico and Connect USVI Funds. AeroNet said the Commission could adjust its location counts prior to the application deadline for Stage 2 support, and should not rely on 2020 census data. It also suggested the Commission modify the process by which Stage 2 applicants can seek adjustment by directing the Bureau to publish a locations adjustment process, similar to the one for the RDOF.

- Reply comments were filed on 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. [E-mpa](#) asserted there is a lack of clarity in the types of events that can trigger the disciplinary process, a lack of differentiation between the seriousness of those events, and a lack of clarity as to who is subject to this process. [Funds for Learning](#) urged the FCC to eliminate USAC's de facto suspension process and place responsibility for suspension and debarment exclusively with the FCC. It also said the FCC should avoid, or at least mitigate, potential harm to innocent third parties impacted by the suspension and debarment. [FR](#)

[Back to Highlights](#)

Misc.

- President Trump has [renominated](#) Commissioner O'Rielly for another term as Commissioner. If O'Rielly is reconfirmed, the term is for five years, from July 1, 2019. [Chairman Pai](#), [Commissioner Carr](#), [Commissioner O'Rielly](#), and [Commissioner Rosenworcel](#) issued statements.
- The FCC issued a [public notice](#) on March 19, 2020, announcing that due to the COVID-19 pandemic, the FCC, effective immediately, has closed its current hand-delivery filing location at FCC Headquarters. The FCC encourages filers to take advantage of the Commission's various electronic filing systems for filing applicable documents. The FCC said when it is necessary to submit documents on paper, it encourages parties to use its current guidelines for sending paper filings.
- In addition to reply comments that were listed in a previous edition of *REGScan*, replies were filed on March 13, 2020, on refreshing the record on ways to modernize and strengthen the truth-in-billing rules. [NATOA](#) urged the FCC to revise its truth-in-billing rules to make clear that government-mandated charges include only those amounts a provider is required to collect directly from customers and remit to federal, state or local government. [ACA Connects](#) suggested the FCC not to move forward hastily with the adoption of TIB requirements for interconnected VoIP service. It said, instead, the FCC should examine and seek comment on whether interconnected VoIP customers have problems understanding their bills and whether the benefits of applying the TIB requirements to interconnected VoIP customers outweigh the costs to providers, especially smaller providers. [CTIA](#) asserted the record shows consumers are benefiting from the FCC's current TIB approach and does not support the proposal to mandate a billing format change. CTIA also said the FCC should refrain from applying its truth-in-billing rules to interconnected VoIP service. [public notice](#) | [all replies available](#)
- To date, no replies were filed on NECA's December 2019 [proposed average schedule formulas](#). [public notice](#)
- Reply comments were filed on March 20, 2020, on the [NPRM](#) on updating its unbundling and resale rules to reflect the marketplace realities of intermodal voice and broadband competition. The [Michigan PSC](#) said the FCC should delay reaching any decision on the proposals in the NPRM until up-to-date data can be collected, an in-depth market analysis can be performed, the concerns raised by CLEC and consumer commenters can be carefully evaluated, and the potential impacts on public safety can be addressed. The [SBA Office of Advocacy](#) asserted the proposed action could have a significant economic impact on small entities, competition in the telecommunications markets, and consumers. SBA encouraged the FCC use the information in the record to publish a FNPRM seeking public comment on a supplemental IRFA that estimates the impact of the proposal on small CLECs. It also suggested the FCC to publish its completed cost-benefit analysis for public comment. [Cloud Communications Alliance](#) asserted because the Commission lacks accurate broadband mapping data and is seeking to revise its data-collection and mapping rules, the Commission should defer decision in this proceeding until such rules are adopted and fully implemented, and it can assess where there is and is not broadband competition. [order](#), [FR](#), [all replies available](#)
- An FCC [notice](#) was published in the Federal Register on March 20, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated

with supply chain and national security. The FCC said the information collection is designed to collect data from ETCs and other carriers to determine the extent of which potentially prohibited equipment exists in current networks and the costs associated with removing such equipment and replacing it with equivalent equipment. PRA comments are due May 19, 2020.

- Viaero Wireless [spoke with](#) advisors to Chairman Pai and Commissioners Rosenworcel and Starks on March 11 and 12, 2020, to discuss Commission efforts to develop a mechanism for replacing and removing equipment provided by covered companies. Viaero discussed the cost and actions it will have to take to remove and replace its equipment, and requested the Commission actively engage with all affected carriers to develop milestones, incentives, and individual plans to remove covered equipment within their networks at the earliest possible date.
- An FCC [notice](#) was published in the Federal Register on March 20, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with price cap pricing flexibility. In 1999, the FCC permitted price cap LECs to introduce new services on a streamlined basis, without prior approval or cost support requirements, and eliminated the public interest showing required by section 69.4(g), and, except in the case of new loop-based switched access services, eliminated the new services test required by 61.49(f) and (g). PRA comments are due May 19, 2020.
- The Wireline Competition Bureau issued a [public notice](#) on March 18, 2020, granting a section 214 [application](#) filed by the Bonita L. Simon Revocable Trust U/A/D March 4, 2011 and the Simon Family Trust U/A/D March 4, 2011 (Transferor Trusts) and Rural Communications Holding Corporation, requesting consent to transfer control of Lonsdale Telephone from the Transferor Trusts to RCHC. Pursuant to the terms of the proposed transaction, RCHC will purchase all of the outstanding stock of LTCL from the Transferor Trusts, therefore giving RCHC control of LTCL's network facilities and operations.
- The FCC issued a [public notice](#) on March 19, 2020, to announce the next meeting of the North American Numbering Council will be held via conference call, on May 5, 2020. At the meeting, the NANC will receive status reports and updates from its Numbering Administration Oversight, Toll Free Number Assignment Modernization, Nationwide Number Portability, Interoperable Video Conferencing, and Call Authentication Trust Anchor working groups.
- PRA comments are due March 23, 2020, on an extension of a currently approved information collection regarding access to numbering resource application information. [FCC notice](#)
- Comments are due March 23, 2020, on [CenturyLink's](#) application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service.
- Comments are due March 23, 2020, on [Quality Voice and Data's](#) application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service.
- The Consumer and Governmental Affairs Bureau issued an [order](#) on March 19, 2020, addressing a slamming complaint against National Access Long Distance. The Bureau found NALD has responded to and taken action to resolve the complaint.

[Back to Highlights](#)

Upcoming Filing Dates

- Mar. 24 - PRA comments due on an extension of a currently approved information collection associated with payphone compensation. [FR 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 - Challenges due on the preliminary list of census blocks that have been deemed initially eligible for the RDOF Phase I auction. [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. 13 – Comments due on Skybeam's [request](#) for expedited waiver that the Commission waive the letter of credit rules for rural broadband experiments support recipients, and instead allow Skybeam to comply with the recently adopted RDOF letter of credit provisions of section 54.804(c). Reply comments are due April 28, 2020. [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. 16 - Comments due on the re-establishment of a computer matching program the FCC and USAC will conduct with agencies from the states of Colorado, Mississippi, New Mexico and Utah to verify the eligibility of applicants to and subscribers of the Lifeline program. [notice](#)
- 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 Skybeam's [request](#) for expedited waiver that the Commission waive the letter of credit rules for rural broadband experiments support recipients, and instead allow Skybeam to comply with the recently adopted RDOF letter of credit provisions of section 54.804(c). [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](#)
- May 19 - PRA comments due on an extension of a currently approved information collection associated with certain Part 54 ETC designation requirements. [FR](#)
- May 19 - PRA comments due on an extension of a currently approved information collection associated with supply chains. [FR](#)
- May 19 - PRA comments due on an extension of a currently approved information collection associated with price cap pricing flexibility. [FR](#)

[Back to Highlights](#)

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