

NECA's Weekly Federal Regulatory Summary

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March 25, 2019 HIGHLIGHTS

- The FCC released a [tentative agenda](#) for its April 12, 2019 Open Meeting. The FCC will consider six items, including an [Order](#) proposing to eliminate the local service rate floor and its accompanying reporting obligations and an [Order](#) partially granting USTelecom's Forbearance Petition. Chairman Pai posted [a blog](#) discussing the items to be voted at the April 2019 Open Meeting.
- USTelecom [proposed](#) a solution to improving the current broadband mapping capabilities that would, with the help of their vendor CostQuest, create a "Broadband Serviceable Location Fabric" (BSLF) that can serve as the uniform foundation for dramatically more accurate FCC Form 477 reporting. It also announced a mapping pilot in Virginia and Missouri.
- NTCA, USTelecom, ITTA, and WTA [discussed](#) the need to ensure the local service rate floor policy does not harm rural consumers in the coming months. They also discussed the need for a reasonable path for implementation of network performance testing requirements.
- AT&T, ITTA, and WISPA [discussed](#) their joint Petition for Reconsideration of the Network Performance Metrics Order, and urged the Commission to delay the current July 1, 2019 start date for testing.
- Silver Star Telephone filed a [Petition for Reconsideration](#) of the Commission's decision in the December 2018 RoR USF Reform Order to make no changes to the rural growth factor or the application of the high cost loop support cap.
- A coalition of 12 carriers [supported](#) CenturyLink's [Petition for Declaratory Ruling](#) to make clear that end office local switching access reciprocal compensation charges apply to traffic that originates from or terminates to an over-the-top VoIP end-user. CenturyLink [asserted](#) the Commission intended in the Transformation Order for its new VoIP-PSTN framework to encompass both fixed and nomadic VoIP.

Other Key Upcoming Dates

- Mar. 25 - Replies [due](#) on NECA's December 20, 2018 [proposed revisions](#) to formulas used for average schedule interstate settlement disbursements.
- Apr. 8 - Replies [due](#) on the December 2018 RoR USF Reform [FNPRM](#).

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

USF Reform

- The FCC issued a [news release](#) on March 21, 2019, saying Chairman Pai has announced the Commission will vote at its April 12, 2019 Open Meeting to eliminate the local service rate floor. Pai said “The FCC’s rate floor is a counterproductive regulation that hurts rural Americans, . . . For example, unless the Commission takes action, many rural consumers will be forced to pay almost 50% more out of their pockets starting this July.”
- Silver Star Telephone filed a [Petition for Reconsideration](#) on March 21, 2019, of the Commission’s decision in the December 13, 2018 RoR USF Reform Order to make no changes to the rural growth factor or the application of the high cost loop support cap. It claimed the Order failed to address the record evidence of the harm to carriers and the public caused by the continually declining HCLS cap and contained material errors of fact. It said commenters pointed out that the growth factor was designed to account for increases in the number of working loops and may never have been intended to apply to decreases in the number of working loops. It argued support is still needed for the costs of provisioning that loop which have already been incurred and, as carriers of last resort, RLECS are required to maintain the loops in the event service should be requested again.
- NTCA, USTelecom, ITTA, and WTA [met with](#) Chairman Pai’s Special Counsel on March 15, 2019, to discuss the urgent need to ensure the local service rate floor policy does not harm rural consumers in the coming months, particularly as customer notifications must be sent and/or state regulatory approvals obtained in connection with substantial rate increases. They also discussed the need for a reasonable path for implementation of network performance testing requirements, including the need for: the Commission to resolve pending petitions for reconsideration and applications for review and to complete work on implementation details; sufficient time for vendors and providers to develop solutions that conform to the final specifications and that will impose minimal intrusion upon customer experience; and sufficient time to install such solutions and “test the testing” prior to the effectiveness of compliance requirements that would affect universal service support.
- NTCA, TDS Telecom, Nex-Tech, PTCI, Range Telephone, Shawnee Communications, Finley Engineering, Totelcom, Strata Networks, Moundridge Telephone, and Vantage Point Solutions [met with](#) staff from the Wireline Competition Bureau and Office of Economic Analytics on March 19, 2019, to discuss concerns with the Network Testing Order. They discussed concerns about: traffic load congestion caused by simultaneous testing to servers, temporarily upgrading locations to achieve a minimum sample pool; rules that would discard test results that are in excess of 150% of the advertised speed; and the nearing implementation deadline, lack of generally available solutions, and many unanswered questions that providers have as decisions on final protocols and standards remain pending. NTCA proposed: testing obligations for providers should not become effective before the applicability of build-out obligations that apply to those providers; the rules should not be effective until vendors have sufficient time to create generally available solutions following decisions on final protocols and standards and after ISPs have sufficient time to “bench test” the solutions; and collaborative efforts among the Commission, USAC, and the industry to ensure the final rules comport with the actual operational and administrative functions of small ISP providers.
- AT&T, ITTA, and WISPA [met with](#) Chairman Pai’s Advisor on March 13, 2019, to discuss their joint Petition for Reconsideration of the Network Performance Testing Order. They expressed continued concern over the mismatch between the Order’s treatment of latency vs. speed testing as well as the harsh compliance framework adopted for even minor misses of latency and speed targets. They said given the work still to be done to finalize the performance testing rules, they strongly urged the Commission to delay the current July 1, 2019 start date for testing.
- Pineland Telephone Cooperative filed a [Petition](#) seeking reconsideration of the Commission’s decision to preclude A-CAM I carriers from electing A-CAM II support and obligations. Pineland also recommended an approach that would allow a portion of A-CAM I support to be netted against A-CAM II support. Pineland said this adjustment would allow the Commission to grant the Petition without giving A-CAM I electing carriers the opportunity to over-recover.

- New York State, through its Empire State Development agency, filed [a letter](#) on March 21, 2019, to request the Commission promptly approve the ETC application of Hughes Network Systems in New York. It said the Commission's delay in approving Hughes' ETC application has held up launch of the company's broadband services in New York, threatening the many benefits the Commission originally identified in partnering with New York for distribution of CAF funding in the State. New York State requests the Commission honor the NY CAF Waiver and allow Hughes to access CAF support for the locations that the company was awarded as the winning bidder over one year ago through New York's broadband auction process.

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Broadband

- USTelecom filed [a letter](#) on March 21, 2019, proposing a long-term solution to improving the current broadband mapping capabilities in a manner that will meet the needs of policymakers, American citizens, businesses, and broadband service providers. It claimed not only is a census block-based reporting not granular enough to target areas that lack broadband, but simply asking providers to identify areas where existing service can be provided does not do enough to help understand and solve the digital gap. USTelecom said with the help of its vendor CostQuest, it has developed a proposal to create a "Broadband Serviceable Location Fabric" (BSLF) that can serve as the uniform foundation for dramatically more accurate FCC Form 477 reporting and enhancing the ability to understand the unserved areas of the country. USTelecom also [announced](#) the launch of a broadband mapping pilot in Virginia and Missouri to demonstrate the viability of its proposal and to validate the assumptions. In addition to USTelecom, the Broadband Mapping Initiative consortium is comprised of individual companies and associations, including: AT&T, CenturyLink, Consolidated, Frontier, ITTA, Riverstreet, TDS, Verizon, Windstream, and WISPA.
- Chairman Pai [spoke at](#) USTelecom's Forum on Reinventing Broadband Mapping on March 21, 2019, saying since his first day as Chairman, his number one priority has been closing the digital divide. He claimed by almost every meaningful metric, America's broadband networks have been expanding and improving. Pai noted the Commission has begun to explore ways to improve the quality, accuracy, and usefulness of the broadband data it collects on fixed and mobile broadband service, and said the mapping pilot project USTelecom, ITTA, and WISPA are announcing is intended to help flesh out the record in the FCC's Form 477 reform proceeding. He said by testing new ideas on the ground, he hopes this pilot and similar initiatives will give the Commission and other stakeholders useful information to consider as it moves ahead.
- The Ninth Circuit issued an [Order](#) on March 20, 2019, granting the FCC's motion to consolidate petitions for review filed by [American Electric Power Corporation, et al.](#) and the [City of Portland Oregon](#) of the August 3, 2018 [Order and Declaratory Ruling](#) that allowed one-touch make-ready for most pole attachments, and made further reforms to the pole attachment process. The court assigned these two petitions to the panel assigned to decide the merits of [petitions for review](#) of the FCC's September 2018 [Order](#) on wireless infrastructure deployment. The court referred these consolidated petitions to the court's special master to conduct a case management conference with the parties and stayed the proceedings pending the case management conference.
- The Ninth Circuit issued an [Order](#) on March 20, 2019, granting in part the FCC's [motion](#) to consolidate [petitions for review](#) of the FCC's September 2018 [Declaratory Ruling and Report and Order](#) on wireless infrastructure deployment. The court assigned these consolidated petitions to the panel assigned to decide the merits of the two petitions for review of the [Order](#) on pole attachments. The court referred the consolidated cases to the court's special master to conduct a case management conference with the parties, and said these proceedings are stayed pending the case management conference.
- Chairman Pai [spoke at](#) the Georgia Chamber of Commerce on March 19, 2019, providing an overview of the FCC's priorities and activities. He said the number one priority has been closing the digital divide, noting the FCC has been working hard to modernize its regulations and encourage the private sector to build wired and wireless broadband infrastructure. He said the FCC has given the green light to companies that want to send thousands of satellites into low-earth orbit to provide high-speed

broadband and has reformed the USF support program. He claimed this strategy appears to be working, as America's broadband networks have been expanding and improving. He also said promoting technological innovation is priority 1A, and highlighted the FCC's work to promote 5G wireless connectivity.

- Commissioner Carr [spoke](#) at the WISPAmerica Convention in Cincinnati, Ohio on March 20, 2019, to discuss infrastructure, CAF, and spectrum. He said in March 2018 the FCC updated its environmental and historic preservation rules to reflect new technology, and in September, examined impediments to infrastructure buildout imposed by city and state governments. He discussed the FCC's efforts to ensure it has a fair and robust USF support program for reaching those homes that still lack broadband access, noting the FCC recently concluded an award of CAF-II funds to close the digital divide. He also discussed spectrum issues.
- Vantage Point Solutions [met with](#) Wireline Competition Bureau staff on March 14, 2019, to discuss Form 477 broadband data. VPS said broadband providers need an opportunity to analyze Form 477 reports to identify potential errors and correct them before the FCC makes key decisions on the 477 data, like A-CAM II offers. VPS provided some short-term recommendations to correct known Form 477 errors that could be implemented prior to the A-CAM II offers, such as allowing a 30- to 45-day window to allow Form 477 corrections that would not involve a challenge process. VPS also recommended several longer-term changes to the Form 477 process to help minimize errors and maximize broadband deployment.
- Charter Communications [met with](#) Office of Economics and Analytics staff on March 14, 2019, to discuss the FCC's pending reforms to the Form 477. Charter said the focus of the FCC's mapping effort should be on determining served and unserved areas rather than on reporting subscribed and unsubscribed customers. Charter asserted revising the Form 477 to require providers to submit shapefiles of served areas has significant advantages over recent proposals to require submission of customer subscription data. Charter also raised concerns about providers being forced to turn any of their data over to a third party in testing of any methodologies, and said the Commission should be the only entity that collects any such information.
- Microsoft [met with](#) Commissioner Starks' Legal Advisor on March 11, 2019, to discuss broadband mapping. Microsoft asserted the Commission's broadband availability data appears to overstate the extent to which broadband is actually available throughout the nation. Microsoft suggested the Commission's effort to accurately measure broadband could be improved by drawing on the FCC's subscription data, along with other broadband data sets from third-parties such as Microsoft, to compliment survey data submitted under the current rules.
- NATOA, et al. [met with](#) Wireline Competition Bureau staff on March 13, 2019, to suggest the Commission continually re-evaluate the appropriate broadband speed requirements for service to rural areas by carriers receiving federal support. They discussed their concerns with filings asking the FCC to extend to wireline providers the interpretation of section 253 set forth in the September 27, 2018 Wireless Infrastructure [Order](#). They also requested the FCC act on pending petitions for reconsideration of the Order as well as the August 3, 2018 Pole Attachment [Order](#). NATOA, et al. also [met with](#) Commissioner Starks, his Chief of Staff and Legal Advisor to discuss various issues, including the August and September 2018 Orders.

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ICC

- A coalition of twelve carriers filed a [letter](#) on March 19, 2019, in support of two proposals made by CenturyLink. They said the Commission should adopt a rule confirming that all carriers have the duty to either permit any requesting carrier to obtain direct network interconnection for the termination of access traffic or bear responsibility for the costs of receiving traffic via indirect interconnection. They also recommended the Commission grant CenturyLink's May 11, 2018 [Petition for Declaratory Ruling](#) to make clear that under the Commission's VoIP Symmetry Rule, end office local switching access

reciprocal compensation charges apply to traffic that originates from or terminates to an over-the-top VoIP end-user.

- CenturyLink [met with](#) Chairman Pai's Special Counsel on March 13, 2019, to assert the Commission intended in the Transformation Order for its new VoIP-PSTN framework to encompass both fixed and nomadic VoIP. CenturyLink said the rule proposed by Verizon, i.e., that end office access charges should depend on whether the device that has connected to the VoIP server connects over a facility purchased from the LEC or the VoIP partner or whether it was purchased separately, is untenable. CenturyLink also claimed the precedent AT&T and Verizon rely on in support of their proposed rule in fact supports CenturyLink's position, and claimed the holding of the RAO 21 Reconsideration Order cannot be reconciled with AT&T's assertion. CenturyLink claimed a straightforward reading of ILEC tariffs also confirms that such tariffs apply to over-the-top VoIP traffic, and AT&T and Verizon's argument that over-the-top traffic is somehow not subject to end office switching charges in these circumstances simply ignores the law.
- Comcast [met with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on March 19, 2019, to discuss access arbitrage and ongoing access stimulation schemes Comcast encounters. Comcast urged the Commission to adopt its proposal to require "access-stimulating LECs to . . . bear the financial responsibility for the delivery of terminating traffic to their end office, or functional equivalent." Comcast also discussed 8YY traffic, including the need to gradually transition 8YY originating access charges to zero over a reasonable period and to establish a reasonable limitation on database dip charges.
- The Native American Telephone Companies [met with](#) FCC staff on March 11, 2019, to claim the remaining levels of intercarrier compensation are absolutely necessary for rural carriers, who incur significant costs to bring telecommunications services to rural areas that have been ignored or abandoned by larger carriers.
- Great Plains Communications filed [a letter](#) on March 18, 2019, withdrawing its [Petition for Waiver](#) of § 51.909(a)(4) and § 51.917. The Petition sought permission for Great Plains to use the company's actual switched access revenues in establishing rates and eligible revenue recovery instead of projections.

Universal Service

- Sprint filed a [letter](#) on March 18, 2019, on the National Lifeline Eligibility Verifier. Sprint suggested the Commission defer de-enrollments and maintain soft launch status for the NV until USAC has automated access to SNAP and Medicaid databases. Sprint recommended the database search criteria be refined, that there be enhanced feedback on reverification failure causes, and consistent, transparent application of eligibility criteria. Sprint also urged the FCC to initiate a proceeding to consider whether it should temporarily suspend the recertification process for Lifeline end users in states where the NV has not yet been deployed.
- The National Lifeline Association [spoke with](#) Wireline Competition Bureau staff on March 14, 2019, to discuss the National Lifeline Eligibility Verifier. NaLA suggested the re-verification process being rolled out through the NLEV must incorporate checks or "dips" against the national CMS/Medicaid database, as well as any additional state SNAP databases that may come online, prior to any de-enrollments. NaLA also expressed support for NARUC's [recent resolution](#) on maximizing NLEV access to state databases and support for improving the manual reverification process, and for recent stakeholder support for implementing a NLEV service provider API solution.
- AT&T [met with](#) Wireless and Wireline Competition Bureau and Office of Economics and Analytics on March 19, 2019, to urge the Commission to adopt its proposed Uniendo a Puerto Rico Fund and Connect USVI Fund Stage 2 funding for mobile providers, with some modifications. AT&T recommended the Commission allocate funding between the territories based on Census Bureau population figures and not based on the legacy amounts each territory received pre-hurricanes. AT&T also urged the Commission to reject its proposal to impose Mobility Fund Phase II service obligations on Stage 2 fund recipients and not to adopt resiliency requirements that are specific to Stage 2 Fixed Fund and Mobility Fund recipients.

- Broadband VI filed [reply comments](#) on March 21, 2019, to Viya's [comments](#) on its [Petition](#) for a waiver of the Lifeline minimum service standards for its fixed broadband service. Broadband VI said Viya's request for a further comment period is unnecessary and is intended to cause unnecessary delay. It claimed there is sufficient information in the record for the Commission to rule on the Waiver Request. [Public Notice](#)
- Petitions for Reconsideration and Clarification were filed on March 18, 2019, of the Wireline Competition Bureau's [Public Notice](#) that provided guidance for determining rural rates in the Rural Health Care Telecommunications Program. [GCI](#) asserted the guidance in the Public Notice fails to provide enough information to allow a healthcare provider or service provider to determine permissible rates, but does often bar program participants from relying on the best evidence of such rates—the market rates for their services. [TeleQuality Communications](#) asked the Bureau to clarify that a service provider using the third method of determining rural rates described in the Public Notice need not submit its rates to the Commission or the relevant state commission before it responds to a rural health care provider's request for bids, and clarify what kind of documentation will satisfy the “publicly available rates” requirement.
- [GCI](#) [met with](#) Office of Economics and Analytics staff on March 19, 2019, to express concern with [recent guidance](#) from the Wireline Competition Bureau addressing calculation of permissible rural telecommunications rates in the Rural Health Care Program. [GCI](#) argued that WCB's guidance does not reflect sound or consistent economic principles, and could both increase costs to the Universal Service Fund and decrease participation in the Program. It recommended using forbearance to increase co-payments by healthcare providers, and suggested the RHC Program would benefit from adopting some of the transparency requirements of the E-rate Program to facilitate better market function. [GCI](#) [also met with](#) Commissioners O'Rielly and Rosenworcel and their Advisors to discuss the same issues.
- [TeleQuality Communications](#) [spoke with](#) Wireline Competition Bureau staff on March 19, 2019, to discuss the recent [Public Notice](#) on calculation of rural telecommunications rates in the Rural Health Care Program for Funding Year 2019. [TeleQuality](#) discussed its concerns regarding what constitutes sufficient documentation for “publicly available” urban rates, as described in its recent [Petition for Clarification](#).
- The Alaska State Hospital and Nursing Home Association filed a [letter](#) on March 15, 2019, to discuss calculation of support for rural health care. It said having rates that are competitively bid is the most accurate and administrable way to assess the cost of service provision in an area and allows for rates that are based on the service demands of the day and the planned investments for tomorrow, to ensure that there is stability in health care, education, employment options, and opportunities in rural areas.
- [AT&T](#) [met with](#) Wireline Competition Bureau staff on March 14, 2019, to discuss reforms to the Commission's Rural Health Care Telecom Program outside of Alaska. [AT&T](#) recommended the Commission or USAC clarify information required on Form 465 (description of services requested and certification form). [AT&T](#) recommended the Commission amend its current Telecom Program competitive bidding rule to require an HCP to make price the primary factor as it considers multiple bids, and also make public certain information on Form 466 (funding request and certification form). [AT&T](#) also discussed guidance released by the Wireline Bureau and the rural and urban pricing data it has collected.
- Comments were filed on March 18, 2019, on the [NPRM](#) asking whether the amortization suspension in the E-rate program has encouraged the deployment of high-speed, low-cost connections, and the effect of the amortization suspension on applicants and on USF expenditures. [NTCA](#) supported elimination of the amortization rule, and said in connection with any elimination of the rule, the Commission should amend its E-rate special construction rules to promote better coordination between its USF programs. The [American Library Association](#) supported the proposal to eliminate the amortization requirement, and asserted that permanent removal of the [Amortization Order](#) is also another step toward program simplicity. The [Illinois Dept. of Innovation and Technology](#) said suspension of the amortization requirement has encouraged cost-effective deployment of new

facilities. The [State E-Rate Coordinators Alliance](#) supports suspension of the amortization requirement at least through FY 2019, and agreed with the Commission's assessment that the four-year suspension of amortization has had a positive effect on broadband investment. [Central Texas Telephone Cooperative, et al.](#) also suggested the Commission strongly consider amending the E-rate competitive bidding requirements to include safeguards which would discourage overbuilding of existing federally supported fiber networks. [SHLB](#) asserted requiring service providers to recover their costs over several years could discourage broadband providers from submitting bids for E-rate services. [PSFA](#) claimed elimination of the rule would reduce administrative burden, allow applicants and service providers to receive reimbursements sooner, and reduce the uncertainty of funding for a multi-year project. [FR](#) | [All comments available to date](#). Replies are due April 1, 2019. [FR](#)

- Vermont Telephone and VTel Wireless filed [a letter](#) on March 20, 2019, to express support for proposals to prevent USF funds from being used to acquire and operate equipment that may pose a threat to the nation's security. VTel requested the Commission freeze the distribution of pending USF support to any carrier that cannot attest either to having no prohibited telecommunications equipment in its network or to completing the removal of any prohibited telecommunications equipment from its network within six months of certification.
- Reservation Telephone and CenturyLink filed a [Petition](#) on March 20, 2019, seeking a waiver to expand the RTC Alexander exchange in the state of North Dakota to include North Dakota portions of the CenturyLink Fairview and Sidney exchanges. They also requested waiver of section 69.3(e)(11) so RTC may participate in the NECA tariff pool upon closing of the transaction.
- No replies were filed on Tombigbee's [Petition for ETC designation](#) for a service area containing 100 census blocks in Alabama as a winning bidder in the CAF Phase II Auction. [Public Notice](#)

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State Actions

- The Colorado District Court issued an [Order](#) on March 22, 2019, partially granting defendant Verizon's [motion](#) for a primary jurisdiction referral to the FCC in a billing [dispute](#) between Verizon and Teliix. Teliix claimed Verizon refused to pay for the use of Teliix's facilities to deliver toll free calls from end user customers to Verizon's toll free service subscribers. The court said referral of this matter to the FCC is appropriate on three issues: whether end-office switching rates apply when calls involve a CLEC and an over-the-top VoIP provider; whether end-office switching rates apply when a CLEC has not assigned the caller's telephone number; and whether end-office switching rates apply to Plaintiff for toll-free calls dialed by customers outside of Colorado. The court denied Verizon's request for a stay pending the FCC's resolution, saying Teliix's collection action has components that do not depend on the FCC's resolution of these issues.

Misc.

- The FCC issued a [tentative agenda](#) on March 22, 2019, for its April 12, 2019 Open Meeting. The FCC will consider: a [Report and Order](#) that would eliminate the high-cost program's local service rate floor rule; a [Memorandum Opinion and Order](#) that would grant forbearance to Bell Operating Companies and independent incumbent carriers from certain structural and nondiscrimination requirements; a [Notice of Proposed Rulemaking](#) that proposes to modernize the FCC's rule for over-the-air-reception devices to facilitate the deployment of modern fixed wireless infrastructure; a [Public Notice](#) seeking comment on procedures for the incentive auction of Upper 37 GHz, 39 GHz, and 47 GHz Bands (Auction 103) for Next Generation Wireless Services; a [Report and Order](#) that would allow Fixed-Satellite Service earth stations to be individually licensed to transmit in the 50 GHz band and would establish a process for the Department of Defense to operate on a shared basis in the Upper 37 GHz band in limited circumstances; and a [Report and Order](#) that would eliminate the requirement that cable operators maintain a channel lineup at their local office and eliminate the requirement that certain cable operators make their channel lineup available via their online public inspection file.
- Pai posted [a blog](#) on March 21, 2019, discussing the items to be voted at the April 12, 2019 Open Meeting. He said the Commission will vote on spectrum for 5G and other advance wireless

applications. Pai indicated the rest of the FCC's April meeting will feature a series of measures to modernize or eliminate outdated rules, including the local service rate floor rule, which he said he hopes the Commission will vote to get rid of. He also indicated he is circulating an Order that would address portions of USTelecom's Petition for Forbearance from certain requirements imposed on ILECs, including forbearing from the rule that smaller, rural incumbent carriers offer long-distance telephone service through a separate affiliate, relieving incumbent carriers from the obligation to submit unnecessary reports about their legacy "special access" services, and relief from a duplicative statutory provision regarding access to telephone poles.

- The Wireline Competition Bureau issued a [Public Notice](#) on March 20, 2019, to announce that access to the secure data enclave containing highly confidential data filed in the price cap business data services proceedings will close after March 22, 2019, unless an interested party demonstrates that continued access to the data is necessary to their meaningful participation in the proceeding. The Bureau said all parties' data and work product stored in the secure data enclave will be saved and archived as of March 22, 2019, pending judicial or administrative review.
- The FCC released its [FY 2020 Budget Estimates to Congress](#) on March 18, 2019, requesting \$335,660,000 in budget authority from regulatory fee offsetting collections. The FCC said this budget request is \$3,340,000 less than the FY 2019 fiscal year budget, and will be used to support the following strategic goals for FY 2020: closing the digital divide; promoting innovation; protecting consumers and public safety; and reforming the FCC's processes. [Budget in Brief](#)
- The FCC released a [Public Notice](#) on March 22, 2019, granting the application for transfer of control of West Telecom Services and West IP Communications pursuant to the Commission's streamlined procedures for domestic section 214 transfer of control applications, §63.03.
- The Wireline Competition Bureau released a [Public Notice](#) on March 22, 2019, seeking comment on a 214 application filed by CP-TEL Holdings, Campiti-Pleasant Hill Telephone, CP-TEL Network Services, and Epic Touch requesting consent to transfer control of CP-TEL and its wholly owned subsidiaries, Campiti and CPTN, to Epic Touch. Comments are due April 5, 2019; replies are due April 12, 2019.
- The Wireline Competition Bureau issued a [Public Notice](#) on March 18, 2019, granting the section 214 application for transfer of control of EATELCORP to Reserve Communications and Computer Corporation under the Commission's streamlined procedures for domestic section 214 transfer applications.
- The FCC released the [Report and Order](#) on spectrum between 95 GHz and 3 THz adopted at the March 15, 2019 Open Meeting on March 21, 2019. The Order will permit enhanced experimental licensing and unlicensed applications within this spectrum band and advance the Commission's commitment to identify and make available unused and underused spectrum regardless of the frequency range.
- The FCC released the [Fourth FNPRM](#) on March 18, 2019, proposing a vertical, or z-axis, location accuracy metric in connection with wireless E911 calls that was adopted at its March 15, 2019 [Open Meeting](#).
- An FCC [Notice](#) was published in the Federal Register on March 20, 2019, seeking PRA comments on an extension of a currently approved information collection associated with direct access to numbering resources. The FCC said the data, information, and documents acquired through this collection will allow interconnected VoIP providers to obtain numbers with minimal burden or delay while also preventing providers from obtaining numbers without first demonstrating that they can deploy and properly utilize such resources. PRA comments are due May 20, 2019.
- The Wireline Competition Bureau issued a [Public Notice](#) on March 22, 2019, granting Bright Packet's application for interconnected VoIP numbering authorization. The Bureau said this proceeding will be terminated 60 days from the date of this public notice if there are no further filings.

Upcoming Filing Dates

- Mar. 25 - Replies due on NECA's December 20, 2018 [proposed revisions](#) to formulas used for average schedule interstate settlement disbursements. The revisions are proposed to become effective for a one-year period beginning July 1, 2019. [Public Notice](#)
- Mar. 25 - Comments due on two applications for transfers of control: NTS Communications, NTS Telephone, PRIDE Network, and XFone seek approval for transfer of control to Clarity Telecom, d/b/a Vast Broadband; and Clarity Holdings seeks approval for transfer from PC III Holdings to Python Intermediate II. Replies are due April 9, 2019. [Public Notice](#)
- Apr. 1 - Replies due on the [NPRM](#) on whether the amortization suspension has encouraged the deployment of high-speed, low-cost connections, and the effect of the amortization suspension on applicants and on USF expenditures. [FR](#)
- Apr. 3 - Comments due on the [NPRM](#) proposing to amend its Truth in Caller ID rules to implement the anti-spoofing provisions of the RAY BAUM'S Act. Reply comments are due May 3, 2019. [FR](#)
- Apr. 5 - Comments due on a 214 application filed by CP-TEL Holdings, Campti-Pleasant Hill Telephone, CP-TEL Network Services, and Epic Touch requesting consent to transfer control to Epic Touch. Replies are due April 12, 2019. [Public Notice](#)
- Apr. 8 - Replies due on the [FNPRM](#) on implementing an auction mechanism for support in legacy areas that are overlapped by an unsubsidized competitor, addressing budgetary impacts as carriers transition to broadband-only lines, and applying the TBF from the A-CAM II offer to legacy carriers. [FR](#)
- Apr. 8 - PRA comments due on an extension of a currently approved information collection pursuant to section 69.605, Reporting and Distribution of Pool Access Revenues, Part 69-Access Charges. [FR](#)
- Apr. 9 - Replies due on two applications for transfers of control: NTS Communications, NTS Telephone, PRIDE Network, and XFone seek approval for transfer of control to Clarity Telecom, d/b/a Vast Broadband; and Clarity Holdings seeks approval for transfer from PC III Holdings to Python Intermediate II. [Public Notice](#)
- Apr. 12 - Replies due on a 214 application filed by CP-TEL Holdings, Campti-Pleasant Hill Telephone, CP-TEL Network Services, and Epic Touch requesting consent to transfer control to Epic Touch. [PN](#)
- Apr. 12 - PRA comments due on a request for extension of an information collection associated with Mobility Fund I support. [FR](#)
- Apr. 22 - PRA comments due on a revision to an existing information collection in FCC Form 481. [FR](#)
- Apr. 26 - Responses due from parties filing petitions for waiver between 2006 and 2013 of various high-cost universal service filing deadlines that intend to pursue their petition. [Public Notice](#)
- May 3 - Replies due on the [NPRM](#) proposing to amend its Truth in Caller ID rules to implement the anti-spoofing provisions of the RAY BAUM'S Act. [FR](#)
- May 13 - PRA comments due on a revision of a currently approved information collection associated with Rural Health Care Program Forms 460, 461, 462, 463, 465, 466, and 467. [FR](#)
- May 20 - PRA comments due on an extension of a currently approved information collection associated with direct access to numbering resources. [Notice](#)

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