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### March 26, 2018 HIGHLIGHTS

- The FCC issued a [Report and Order, Third Order on Reconsideration, and NPRM](#) on high-cost USF rate-of-return reform. The Order, among other things: codified rules prohibiting the use of federal high-cost support for expenses that are not used for the provision, maintenance and upgrading of facilities and services for which the support is intended; offers additional high-cost support to RoR carriers that previously accepted A-CAM support; and resolved or clarified certain issues raised in petitions for reconsideration of the March 2016 RoR Reform Order. The NPRM seeks comment on additional reforms to high-cost support. Comments are due 30 days after Federal Register; replies are due 60 days after FR.
- The FCC adopted six items at its March 22, 2018 [Open Meeting](#), including: a [Second Report and Order](#) that clarifies and modifies the procedures for NHPA and NEPA review of wireless infrastructure deployments; a [Second FNPRM](#) to address the problem of unwanted calls to reassigned numbers; and a [Notice of Inquiry](#) examining location-based routing of wireless 911 calls to ensure calls are routed to the proper 911 call center.
- The FCC [announced](#) it is accepting applications from broadband providers to participate in this summer's CAF Phase II reverse auction. It said providers must submit their applications by March 30, 2018, when the application window closes. The FCC posted [a webpage](#) to receive applications.
- The FCC [published](#) in the Federal Register the February 28, 2018 [Order on Reconsideration](#) that granted in part and denied in part the ATA's [Petition for Reconsideration](#) of the Bureau's Map Instructions [Public Notice](#).
- The FCC [seeks](#) PRA comments on a new information collection on the Application for CAF Phase II Auction Support, FCC Form 683, and on a revision of a currently approved collection associated with High Cost USF support forms. Comments are due May 21, 2018.
- Chairman Pai sent letters to: [Rep. Collin C. Peterson](#) (D-Minn.) on providing more than \$500 million in funding to the High-Cost USF Fund; [Rep. Peter Welch](#) (D-Vt.) on the BDAC and broadband in rural areas; and [Rep. Paul Tonko](#) (D-N.Y.) on bridging the digital divide and Form 477 data.
- Petitioners in the Ninth Circuit case that is reviewing the Restoring Internet Freedom [Order seek](#) to transfer the case to the D.C. Circuit Court.
- President Trump [signed](#) the [Consolidated Appropriations Act, 2018](#), which is a \$1.3 trillion spending bill that funds the federal government through September 2018. The bill includes: \$600 million for a new broadband loan and grant pilot program; \$7.5 million for NTIA to update the national broadband availability map; streamlines broadband facility applications on federal lands; and reauthorizes the FCC, among other things.
- [Reply comments](#) were filed on the Lifeline [NPRM and NOI](#).

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#### Other Key Upcoming Dates

- Mar. 29 - Replies [due](#) on SDN's [Petition](#) for a declaratory ruling addressing questions raised in the litigation involving an agreement between SDN and AT&T under which SDN provides transport service for AT&T access traffic.
- Apr. 2 - Comments [due](#) on Titonka Telephone and Burt Telephone's [Petition](#) for a waiver to merge their study areas and modify their 2011 revenue requirement and base period revenue. Replies are due April 17, 2018.

## USF Reform

- The FCC issued a [Report and Order, Third Order on Reconsideration, and NPRM](#) on high-cost USF rate-of-return reform on March 23, 2018. The Report and Order, among other things: codified rules prohibiting the use of federal high-cost support for expenses that are not used for the provision, maintenance and upgrading of facilities and services for which the support is intended; adopts rules prohibiting recovery of certain expenses via interstate rates; and offers additional high-cost support to RoR carriers that previously accepted A-CAM support. The Third Order on Reconsideration resolved or clarified certain issues raised in petitions for reconsideration of the March 2016 RoR Reform Order, including fully funding carriers affected by the high-cost budget control mechanism from July 2017 to June 2018, and adding the adjustment factor GDP–CPI to the OpEx limitation. The NPRM seeks comment on additional reforms to high-cost support, and asks, for example, whether to fully fund existing A-CAM support recipients, afford a new opportunity for legacy providers to elect model-based support, and establish a minimum threshold of support for legacy providers that would not be subject to a budget cap. Comments are due 30 days after Federal Register; replies are due 60 days after FR.
- The FCC issued a [News Release](#) on March 19, 2018, announcing it is now accepting applications from broadband providers to participate in this summer's CAF Phase II reverse auction. It said providers must submit their applications by March 30, 2018, when the application window closes. The auction will make available up to \$1.98 billion over the next decade to help build out high-speed internet access to up to 1 million homes and small businesses in rural areas across the country that lack service. The FCC posted [a webpage](#) to receive applications.
- The FCC issued [a notice](#) in the Federal Register on March 23, 2018, publishing the Wireline Competition and Wireless Telecommunications Bureaus' February 28, 2018 [Order on Reconsideration](#) that granted in part and denied in part the Alaska Telephone Association's [Petition for Reconsideration](#) of the Bureaus' Map Instructions [Public Notice](#). ATA also sought clarification regarding Alaska Plan carriers' map data filing obligations. The Bureaus granted the Petition with respect to the required data accuracy standard for the map collection due to be filed in 2018, and extended the March 1, 2018, submission deadline until July 1, 2018.
- The FCC published [a Notice](#) in the Federal Register on March 21, 2018, seeking PRA comments on a new information collection on the Application for CAF Phase II Auction Support, FCC Form 683. Under this information collection, the Commission will collect information from winning bidders seeking to become authorized for CAF Phase II support. The FCC also seeks comments on a revision of a currently approved collection associated with High Cost USF support forms. The FCC proposes: to revise Form 481 and its accompanying instructions to reflect new or modified requirements; to remove Form 505 from this collection because the CAF Phase II challenge process has ended; and to move FCC Forms 507, 508, and 509 to information collection 3060–0233. Comments are due May 21, 2018.
- Chairman Pai sent [a letter](#) to Rep. Collin C. Peterson (D-Minn.) on March 14, 2018, in response to his [letter](#) of support for providing more than \$500 million in funding to the High-Cost USF Fund. Pai said the USF Order will provide over \$500 million in additional funding to cooperative and small rural carriers, including those participating in the A-CAM plan, and will seek public input on both further increasing support to current A-CAM recipients and on giving legacy RoR carriers a new chance to elect model-based support.
- Chairman Pai sent [letters](#) to twelve House members on March 14, 2018, in response to their [letter](#) on the Pennsylvania PUC and the Pennsylvania Department of Community and Economic Development's Petition for access to CAF Phase II competitive bidding funds. Pai said because the Petition did not explain why the state's matching efforts were insufficient to accomplish its goals, the Commission denied the request in January. Pai noted, however, that in 2019, the FCC plans to move on to the Remote Areas Fund for those areas still without high-speed broadband, and indicated any funding originally intended for rural Pennsylvania will be available to build there in that second auction.

- March 22, 2018 was the deadline for providers that qualify as an unsubsidized competitor to notify ACS and the Commission that they already serve the blocks identified by ACS to which it proposes to deploy using CAF Phase II support. [Public Notice](#)
- GVNW [spoke with](#) Commissioner O’Rielly’s Legal Advisor on March 20, 2018, to discuss achieved-to-date performance obligations for Alaska Plan carriers; Arctic Slope Telephone Association, Bush-Tell, Copper Valley Telephone, Interior Telephone, Matanuska Telephone Association, Mukluk Telephone, and Nushagak Cooperative.
- The Rural Wireless Association filed [a letter](#) on March 21, 2018, to express concern about the use of a square kilometer grid cell as a part of the “multi-step geospatial-data-processing approach” for the Mobility Fund II challenge process. RWA said in the majority of rural America, roads are situated directly on the borders of a one mile by one mile grid, and said a square kilometer grid cell could be entirely encapsulated within a square mile road grid cell, leaving no access to drive any portion of a single kilometer-based grid cell. RWA said this is not the “robust challenge process” rural Americans have been promised, and said it joins Congressional leaders in urging the Commission to revisit its eligibility determinations and challenge process requirements before auctioning \$4.53 billion in MF-II support.

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## Open Internet

- Mozilla, Coalition for Internet Openness, Etsy, Benton Foundation, Free Press, Vimeo, Public Knowledge, National Hispanic Media Coalition, Open Technology Institute, Center for Democracy & Technology, Ad Hoc Telecom Users Committee, NTCH, and the States of New York, et al. filed a [Motion](#) with the Ninth Circuit Court on March 16, 2018, asking for a transfer of the proceeding on the Petitions for Review of the Restoring Internet Freedom [Order](#) to the D.C. Circuit Court. They claimed transfer is warranted by all of the factors considered by the Court, including the convenience of the parties, the choice of forum made by the majority of the petitioners, and the fact that the Court’s sister Court for the D.C. Circuit has considered virtually identical issues in inter-related proceedings.

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## ICC

- Bandwidth [made presentations](#) to Chairman Pai’s Advisor and Wireline Competition Bureau staff on March 15, 2018, to discuss originating access charges. Bandwidth claimed competition in the provision of toll-free services is hampered by a number of factors, including high originating access charges, the prevalence of revenue sharing schemes, and the inability of competitors like Bandwidth to obtain IP interconnection with ILECs. Bandwidth said it supports reduction of originating access charges, but suggested the Commission not focus primarily on reduction of end office switching charges, but also address tandem switching and transport charges as well as database query charges. Bandwidth advocated making 8YY query charges subject to the existing CLEC mirroring rule and capping the number of transport miles that an originating LEC can bill for at a reasonable level.

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## Broadband

- President Trump [signed](#) the [Consolidated Appropriations Act, 2018](#) on March 23, 2018, which is a \$1.3 trillion spending bill that funds the federal government through September 2018. The bill includes: \$600 million for the Secretary of Agriculture to conduct a new broadband loan and grant pilot program (pg 126); \$7.5 million for NTIA to update the national broadband availability map, in coordination with the

FCC (pg 137); streamlines broadband facility applications on federal lands (pg 1902), and reauthorizes the FCC (pg 1845), among other things. Chairman Pai issued a [statement](#).

- The FCC issued a [Notice](#) in the Federal Register on March 21, 2018, seeking Paperwork Reduction Act comments on a revision of a currently approved information collection associated with section 214(a) discontinuance of service procedures. The Commission will use the information to determine if affected respondents are in compliance with its rules and the requirements of section 214. Comments are due April 20, 2018.
- Chairman Pai sent a [letter](#) to Rep. Peter Welch (D-Vt.) on March 14, 2018, in response to his [letter](#) urging Pai not to act on recommendations from the Broadband Deployment Advisory Committee until the group reaches a consensus on how best to spur broadband deployment. Pai said he is pleased with the progress of the BDAC, noting a number of final recommendations in January were approved by at least a super-majority of members, with many approved unanimously. Pai also said the FCC maintained the 25 Mbps/3 Mbps benchmark for high-speed fixed broadband service and concluded that mobile broadband is not a full substitute, and he has asked his colleagues to support an additional \$500 million in USF funding for broadband in areas served by small rural carriers and cooperatives.
- Chairman Pai sent a [letter](#) to Rep. Paul Tonko (D-N.Y.) on March 14, 2018, to respond to his [letter](#) asserting the Commission has failed to bridge the digital divide and questioning the accuracy of Form 477 data. Pai said the FCC has maintained the benchmark speed for high-speed fixed broadband service at 25 Mbps/3 Mbps, concluded that mobile broadband is not a full substitute for fixed service, and dedicated up to \$170 million to aid the deployment of broadband infrastructure to unserved areas of rural New York. Pai also said the purpose of the August 2017 FNPRM is to collect better and more accurate information and to explore ways to increase the usefulness of the Form 477 data collected for fixed and mobile broadband deployment.
- Chairman Pai [spoke](#) at ACA's annual summit on March 21, 2018, saying small broadband providers help close the digital divide. He said more than 24 million Americans still do not have terrestrial fixed broadband access at 25/3 Mbps, noting while 2 percent of urban households cannot get high-speed home broadband, 30 percent of rural Americans cannot. Pai said small broadband providers also help drive competition and invested \$2 billion per year to upgrade networks and expand service areas. He also discussed FCC efforts to close the digital divide, noting it recently opened the application window for the CAF Phase II reverse auction, which will distribute nearly \$2 billion over the next decade to support fixed broadband deployment in rural America.
- The FCC's Intergovernmental Advisory Committee issued a [recommendation](#) on wireless infrastructure. The IAC suggested the FCC: complete its pending RF proceeding; focus on incentives for broadband deployment to rural and low income areas; and consider the unintended consequences of adopting rules that further preempt State, local, and Tribal control related to siting of wireless infrastructure, among other things.
- Reps. Anna Eshoo (D Calif.), Frank Pallone, Jr. (D N.J.), and Paul Ruiz (D Calif.) sent a [letter](#) to Commissioner Carr on March 20, 2018, to urge him to reconsider the draft wireless infrastructure [Order](#). They said the draft Order would undermine the foundations of tribal protection and consultation set forth by Congress in the NHPA, while doing nothing to secure a single enforceable commitment that broadband providers will actually build more infrastructure.
- Shenandoah Telecommunications [met separately with](#) Chairman Pai and Commissioners O'Rielly, Carr and Rosenworcel and their Legal Advisors, and Commissioner Clyburn's Legal Advisors on March 19, 2018, to urge the FCC to continue working towards a rational framework that permits expeditious deployment of the broadband network facilities necessary to ensure that residents in rural communities are not left behind. It also asserted the FCC's adoption of properly sized license areas in the 3.5 GHz proceeding would lead to increased investment in the band and a diverse array of competitive entrants.
- NCTA filed a [letter](#) on March 19, 2018, to reply to Sprint's March 15, 2018 [ex parte](#) letter on NCTA's proposed revisions to the definition of small wireless facilities in the draft [Order](#) on wireless

infrastructure. NCTA said while neither the draft [Order](#) nor the proposed rule suggests the Commission intended to extend this exemption beyond antennas and associated equipment to wireline facilities, NCTA proposed expressly excluding wireline facilities to avoid future disputes. NCTA claimed the treatment of wireline backhaul is better considered in a more comprehensive review of state and local obstacles to wireline broadband deployment. NCTA said the Commission should confirm that its proposed rule applies only to small cell antennas and the related equipment described in the rule, and that this final Order does not address wireline deployment.

- CTIA [spoke with](#) Commissioner Carr's Legal Advisor on March 15, 2018, to discuss the [draft Order](#) on wireless infrastructure. CTIA reiterated its support for the Commission's efforts to clarify its procedures for reviewing proposed infrastructure deployments under the NHPA and the NEPA. CTIA claimed the reforms the Commission proposes will bring clarity to the Tribal Consultation Process under section 106 of the NHPA, benefitting industry, the Commission, and Tribal Nations.
- Cox Communications [spoke with](#) Commissioner Clyburn's Legal Advisor on March 15, 2018, to discuss the [draft Order](#) on wireless infrastructure. Cox expressed support for NCTA's March 9, 2018 [letter](#) that proposed a definition of small cell facilities. Cox discussed how revising the draft Order to adopt NCTA's definition would address concerns raised in the record while still encouraging the goal of promoting 5G by streamlining the deployment of antennae/small cells themselves and directly associated equipment, such as power supply.
- Charter Communications [spoke with](#) Chairman Pai's Chief of Staff on March 15, 2018, to express support for the definition of small cell facilities articulated NCTA's [letter](#) that was filed in the wireless infrastructure proceeding. Charter also [spoke with](#) Commissioner Carr on March 15, 2018, to discuss the same issues.
- The Competitive Carriers Association met with Legal Advisors to [Chairman Pai](#) and Commissioner [Carr](#) on March 14 and 15, 2018, to express support for the draft [Order](#) on wireless infrastructure. CCA said streamlining the process for historic and environmental review will expedite the siting process and address concerns and confusion surrounding siting applications. CCA also [met with](#) Commissioner Clyburn's Legal Advisor to discuss similar issues, and filed a [letter](#) on March 16, 2018, to provide greater detail regarding examples of beneficial collaboration between industry and Tribes.
- TechFreedom [spoke with](#) Commissioner Carr and his Legal Advisor on March 14, 2018, to discuss the [draft Order](#) on wireless infrastructure. It supported the Commission's proposal to streamline the deployment of next-generation 5G wireless facilities, and discussed whether the Commission's analysis contained in the proposed Order is adequate to justify excluding new structures, or at least new structures on previously undisturbed ground, from NHPA review.
- USTelecom filed a [letter](#) on March 22, 2018, urging the FCC to move forward with its proposal to create a presumption that ILECs are entitled to competitively neutral rates when attaching to investor-owned utility poles. USTelecom said any framework implemented by the Commission should establish a streamlined process to address unreasonable pole attachment rates contained in existing agreements, and said the FCC should also provide certainty to both ILECs and IOUs about the formula the Commission will apply to determine whether a pole attachment rate is unreasonable if the parties are unable to resolve a rate dispute and must file a complaint at the Commission.
- Google Fiber [met with](#) Legal Advisors to Chairman Pai and Commissioner Rosenworcel on March 19, 2018, to provide an update on the BDAC report recommending one-touch make-ready. Google Fiber also provided and reviewed its March 13, 2018 ex parte response to NCTA's alternative pole attachment proposal.
- Ameren Missouri and Tampa Electric [met with](#) Commissioner Clyburn's Legal Advisor on March 14, 2018, to discuss the need for advance notice of overloading in order to properly engineer the new load on the pole. They also said 8 of the 9 state PUCs that have addressed this issue in the past 10 years have adopted some form of permitting or advance notice requirement for overloading, and asked the Commission to make clear, either through a policy statement or a new rule, that advance notice of



overlapping is a reasonable term/condition in pole attachment contracts. They also reiterated support for one-touch make-ready. Ameren Missouri, Tampa Electric, and Georgia Power also met with Legal Advisors to Commissioners [Rosenwochel](#), [O'Rielly](#), and [Carr](#) and [Wireline Competition Bureau staff](#) on March 15, 2018, to discuss similar issues.

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## Universal Service

- Commissioner Clyburn [spoke at](#) the New School's Digital Equity Laboratory on March 20, 2018, discussing the digital divide. She said to ensure every American is connected, companies must be held accountable and put policies in place. She also expressed concern with actions the Commission has taken on Lifeline, including revocation of a number of providers' authorizations to provide service without notice, establishment of caps on the program, and banning wireless resellers from participating in the Lifeline program.
- Sixty-eight House members sent a [letter](#) to Chairman Pai on March 21, 2018, to urge the Commission to abandon its plan to cut back the Lifeline program. They claimed the plan to exclude the majority of carriers from participating in the program and cap the fund could force millions to lose service. They suggested if the Commission is truly concerned about waste, fraud and abuse, it should work to accelerate the rollout of the National Verifier. They also asked the Commission to move forward with full implementation of the 2016 reforms. [Press Release](#)
- Reply comments were filed on March 23, 2018, on the Lifeline [NPRM and NOI](#). [USTelecom](#) encouraged the FCC to defer further consideration of a self-enforcing budget mechanism until after the National Verifier is implemented, and recommended the Commission streamline and centralize administrative frameworks and adopt appropriate regulatory reforms to the program. [Sprint](#) said resources should be devoted to the enhancement and smooth implementation of the National Verifier, and claimed a self-enforcing cap on the program would jeopardize the goal of bridging the digital divide. [NASUCA](#) said ETCs should not be required to provide Lifeline services over their own facilities and it opposed USTelecom's request to revise the definition of supported services by deleting the reference to broadband services. NASUCA also said the Commission should halt the phase-down of Lifeline support for voice services. [All replies available to date](#). [Order](#)
- Oppositions and comments were filed on Petitions for Reconsideration of the Lifeline Reform [Order](#) filed by [Life Wireless, i-wireless and SafetyNet Wireless](#), and the [Oceti Sakowin Tribal Utility Authority](#). [SBI](#) opposed the petitions, saying the Commission's decision to limit enhanced tribal Lifeline was permissible under the APA and its repeal of the port freeze rule was justified. [TracFone](#) expressed support for Life Wireless, et al's request that the Commission reconsider its recession of the 60-day port freeze rule. [Q Link Wireless](#) also expressed support for Life Wireless, et al's Petition, and said eliminating port freezes exposes the Lifeline program to consumer fraud, raises costs for USAC, and forces ETCs to provide uncompensated, unreimbursed Lifeline service. Replies are due March 27, 2018. [FR](#)
- The Oceti Sakowin Tribal Utility Authority filed a [voluntary withdrawal](#) of its [Petition for Reconsideration](#) of the Lifeline Reform Order on March 22, 2018.
- The Oglala Sioux Tribe filed a [Petition](#) on March 22, 2018, seeking reconsideration of the [Order](#) that granted, in part, its request for a temporary waiver of Lifeline recertification rules. It said the Order only granted a waiver prospectively, which denied relief sought to 1,719 subscribers who had been previously de-enrolled from the program. It asked the Commission to amend the Order to make the waivers retroactive.
- The Wireline Competition Bureau released an [Order](#) on March 19, 2018, waiving the invoice filing deadline under the Healthcare Connect Fund Program for funding year 2017 for the funding request numbers identified in the Appendix. The Bureau said it will allow the applicants and service providers

associated with these FRNs to submit their funding year 2017 invoicing forms to USAC within six months from the issuance date of their funding commitment letters.

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## Misc.

- The FCC adopted the following items at its March 22, 2018 [Open Meeting](#): a [Second Report and Order](#) that clarifies and modifies the procedures for NHPA and NEPA review of wireless infrastructure deployments; a [Second FNPRM](#) to address the problem of unwanted calls to reassigned numbers; a [Notice of Inquiry](#) examining location-based routing of wireless 911 calls to ensure calls are routed to the proper 911 call center; a [Sixth FNPRM](#) to stimulate use of and investment in the 4.9 GHz band; an [NPRM](#) proposing to streamline the reauthorization process for TV satellite stations that are assigned or transferred in combination with a previously approved parent station; and a [Second Report and Order and Second FNPRM](#) that removes the personal use restriction for Provider-Specific Consumer Signal Boosters and seeks comment on ways to further expand access to Consumer Signal Boosters.
- Pioneer Telephone Cooperative [met with](#) Wireline Competition Bureau staff on March 15, 2018, to discuss its pending Petition for Waiver of the jurisdictional separations freeze. It noted its Petition, now pending five years, asked only that the Commission act in accordance with its 2001 promise that carriers electing to freeze their separations factors would be allowed to unfreeze them in 2006. Pioneer said since 2006, the industry has changed significantly and Pioneer has made substantial investments, which the frozen separations factors allocate excessively to the intrastate jurisdiction.
- The FCC released a [Public Notice](#) on March 19, 2018, to announce the FCC and the FTC will co-host a Joint Policy Forum on March 23, 2018, to discuss the regulatory challenges posed by illegal robocalls and what the FCC and FTC are doing both to protect consumers and encourage the development of private-sector solutions. The Notice included the agenda, and indicated discussion topics will include: the factors driving the volume of illegal robocalls; new threats to consumers; protections for legitimate callers; recent FCC, FTC, and state actions to protect consumers; enforcement challenges; third-party solutions and other resources available to empower consumers; and industry efforts to develop Caller ID authentication.
- Chairman Pai [spoke](#) at the FCC-FTC Policy Forum on illegal robocalls on March 23, 2018. He said this cross-agency event reflects the importance of the issue of unwanted robocalls, and noted today's collaboration brings together not only the FCC and the FTC, but also other leaders in government, the private sector, and the non-profit community. Pai reviewed FCC actions on robocalls, and said the FCC and FTC will be co-hosting a Technology Expo on April 23, 2018, that will feature technologies, devices, and applications to minimize or eliminate the number of robocalls consumers receive.
- Shockey Consulting [met with](#) Chairman Pai's Legal Advisor, the Chief Technologist of the Public Safety Homeland Security Bureau, the FCC Chief Technology Officer, and Wireline Competition Bureau staff on March 16, 2018, to discuss establishing a Governance Authority for a U.S. Call Authentication Trust Anchor based on the STIR/SHAKEN framework. Shockey said although the NANC CATA working group has been charged by the Wireline Competition Bureau with considering various selection criterion for the Governance Authority, it has not been asked to actually recommend who or what entity would formally establish such a GA. Shockey suggested the industry can come together in an open multi-stakeholder, consensus-driven process to create the GA and move forward to a selection process for a Policy Authority that could actually operate the Call Authentication Trust Anchor.
- The Professional Association for Customer Engagement and Noble Systems Corporation [met with](#) Chairman Pai's Advisor and Consumer & Governmental Affairs Bureau staff on March 20, 2018, to discuss the Commission's recent activities to target and eliminate unlawful calls. PACE discussed best practices currently in development to mitigate the effects of erroneous call blocking, and suggested

one mitigation strategy includes the use of an intercept message to inform callers when calls are blocked.

- Neustar [met with](#) Chairman Pai's Legal Advisors and the FCC's Chief Technology Officer on March 14, 2018, to assert any contingency rollback to Neustar's NPAC would be consumer disruptive if the cutover occurs on April 8, 2018. Neustar claimed a non-automated approach to rollback is operationally infeasible because of complexity when gathering, sequencing, and restoring NPAC data between the authoritative database, carriers' ordering platforms, and service provider networks for the purpose of call and text routing. Neustar asserted that an automated solution is the only way to avoid wide-scale consumer disruption when the Southeast Region cuts over, and to adopt any rollback approach without validation and testing at real-world scale is careless.
- Bandwidth filed a [letter](#) on March 23, 2018, to express support for the current LNP Administrator transition plan. Bandwidth said it has plans in place to limit customer impact in the unlikely event anything should adversely affect transactions. Bandwidth said it shares the perspectives expressed by other service providers that the NPAC transition to the new LNPA should proceed as scheduled and without delay.
- No comments were filed on Advanced Telecom Solutions' application for authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)

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## Upcoming Filing Dates

- Mar. 26 - Comments due on Grand River Mutual Telephone Corporation and South Central Communications' [Petition](#) for a study area waiver in Iowa. Replies are due April 10, 2018. [Public Notice](#)
- Mar. 27 - Replies due on the National Lifeline Association's [Petition](#) requesting a declaratory ruling that Lifeline ETCs are permitted to seek reimbursement for all Lifeline-eligible subscribers served as of the first day of the month pursuant to sections 54.407(a) and 54.405(e)(3), including those subscribers that are in an applicable 15-day cure period following 30 days of non-usage. [Public Notice](#)
- Mar. 28 - Comments due on HD Carrier's application for authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)
- Mar. 29 - Replies due to oppositions to Petitions for Reconsideration of the Lifeline Reform [Order](#) filed by [Life Wireless, i-wireless and SafetyNet Wireless](#) and the [Oceti Sakowin Tribal Utility Authority](#). [FR](#)
- Mar. 29 - Replies due on South Dakota Network's [Petition for Expedited Declaratory Ruling](#), which requests the Commission issue a declaratory ruling addressing questions raised in the litigation involving an agreement between SDN and AT&T under which SDN provides transport service for AT&T access traffic. [Public Notice](#)
- Apr. 2 - Comments due on Titonka Telephone and Burt Telephone's [Petition](#) for a waiver to merge their study areas and modify their 2011 revenue requirement and base period revenue. Replies are due April 17, 2018. [Public Notice](#)
- Apr. 10 - Replies due on Grand River Mutual Telephone Corporation and South Central Communications' [Petition](#) for a study area waiver in Iowa. [Public Notice](#)
- Apr. 12 - PRA comments due on a revision of a currently approved information collection associated with: pole attachment complaint procedures; implementing LECs' obligations to provide their



competitors with dialing parity and non-discriminatory access to certain services and functionalities; ILECs' duty to make network information disclosures; and numbering administration. [Notice](#)

- Apr. 12 - Comments due on the [NPRM](#) proposing to update the FCC's rules on jurisdictional separations. Replies due April 27, 2018. [FR Notice](#)
- Apr. 17 - Replies due on Titonka Telephone and Burt Telephone's [Petition](#) for a waiver to merge their study areas and modify their 2011 revenue requirement and base period revenue. [Public Notice](#)
- Apr. 20 – PRA comments due on a revision of a currently approved information collection associated with section 214(a) discontinuance of service procedures. [Notice](#)
- Apr. 27 - Replies due on the [NPRM](#) proposing to update the FCC's rules on jurisdictional separations. [FR Notice](#)
- May 7 - PRA comments due on removing business data services from the interstate tariffs of price cap ILECs that are no longer subject to price cap regulation and of CLECs within 36 months of the effective date of the April 28, 2017 Business Data Services Order, i.e., by August 1, 2020. [Notice](#)
- May 7 - PRA comments due on a new information collection pertaining to the recordkeeping requirements when carriers provide CPN of the calling party to law enforcement in connection with a threatening call and, as directed by law enforcement, to security personnel for the called party for the purpose of identifying the party responsible for the threatening call. [Notice](#)
- May 11 - PRA comments due on an extension of a currently approved information collection associated with streamlined tariff filing requirements for LECs. [Notice](#)
- May 14 - PRA comments due on the revisions to the currently approved information collection pertaining to the payphone compensation rules. [Notice](#)
- May 21 - PRA comments due on a new information collection on the Application for CAF Phase II Auction Support, FCC Form 683 and on a revision of a currently approved collection associated with High Cost USF support forms. [Notice](#)

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