

NECA's Weekly Federal Regulatory Summary

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

April 8, 2019 HIGHLIGHTS

- The FCC issued the [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.
- The FCC [announced](#) it is ready to authorize CAF Phase II auction support for the Auction 903 winning bids identified in the attachment to the Public Notice. Applicants are required to submit irrevocable standby letter(s) of credit and Bankruptcy Code opinion letter(s) by April 17, 2019.
- Commissioner O'Rielly wrote a [blog post](#) on a draft item establishing an overall budget for the USF.
- NTCA [supported](#) elimination of the local service rate floor policy and suggested a waiver of the rule may be necessary due to timing concerns. NTCA also [discussed](#) the importance of sufficient and predictable USF funding in making the business case for network investments and also then sustaining the delivery of voice and broadband services in rural America and on tribal lands.
- LICT and WTA [discussed](#) network performance testing requirements for RLECs and other small recipients of high-cost support. They discussed the problem of availability, cost, and compatibility of the performance testing hardware and software that is currently being developed for RLECs and others that do not have the resources to construct their own.
- USTelecom [asserted](#) granting Viasat's Petition for Reconsideration to alter the voice testing methodology set forth in the Performance Metrics Order would undermine the integrity of the CAF program and its auction process.
- The Wireline Competition Bureau issued an [Order](#) establishing procedures for the 2019 annual access charge tariff filings and Tariff Review Plans for ILECs.
- [Comments were filed](#) on the [NPRM](#) proposing to amend the Truth in Caller ID rules to implement the anti-spoofing provisions of the RAY BAUM'S Act. Reply comments are due May 3, 2019.

Other Key Upcoming Dates

- Apr. 8 - Replies [due](#) on the December 2018 RoR USF Reform [FNPRM](#).

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

USF Reform

- The Rural Broadband Auctions Task Force, Wireline Competition Bureau, and Office of Economics and Analytics released a [Public Notice](#) on April 3, 2019, announcing they are ready to authorize CAF Phase II auction support for the Auction 903 winning bids identified in Attachment A of this Public Notice. They indicated to be authorized to receive the total 10-year support amounts listed in Attachment A, the long-form applicants identified in that attachment are required to submit acceptable irrevocable standby letter(s) of credit and Bankruptcy Code opinion letter(s) from their legal counsel for each state where they have winning bids that are ready to be authorized by 6:00 p.m. ET on Wednesday, April 17, 2019. They also said several winning bidders have notified the FCC that they do not intend to pursue some or all of their winning bids, and they are listed in Attachment B. They said Auction 903 support will not be authorized for their relevant winning bids, and these bidders are in default and subject to forfeiture and will be referred to the Enforcement Bureau.
- NTCA [met with](#) Commissioner O’Rielly’s Legal Advisor on April 1, 2019, to express support for elimination of the local service rate floor policy. NTCA said the Commission should also ensure that timing concerns will not result in the impacts of the rate floor slamming rural consumers and operators notwithstanding any potential action on April 12. It noted if the Commission were to reach a decision on the rate floor on April 12, the possibility exists that publication of a summary of that decision may not be published in the Federal Register before May 1, the date USAC will announce the next iteration of the budget control mechanism for high-cost USF support, meaning that USAC would be obligated to calculate the budget control for the period of July 2019 through June 2020 premised upon the rate floor rising by \$8.98 per month as of July 1. NTCA suggested the Commission consider waiving the rate floor on its own motion, similar to what it did in the Separations Freeze Order.
- NTCA [met with](#) Commissioner Starks and his Legal Advisor on April 1, 2019, to discuss the importance of sufficient and predictable universal service funding in making the business case for network investments and also then sustaining the delivery of voice and broadband services in rural America and on tribal lands. NTCA also emphasized the importance of spectrum policies that strike a balance between the goals of reaching as many consumers as possible and promoting operations and service availability in more rural areas specifically.
- GCI filed an [Application for Review](#) on April 1, 2019, of the March 1, 2019 Order denying Alaska Telecom Association’s Petition for a limited waiver of the accuracy standard for two elements of the network maps that Alaska Plan participants must submit annually. GCI asserted the Waiver Denial Order contains factual errors, goes against established Commission precedent for waivers filed by trade associations, lacks a cost-benefit analysis, and reflects the fact that no valid purpose has ever been expressed for a location accuracy standard as strict as 7.6 meters.
- LICT Corporation and WTA [spoke with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on April 2, 2019, to discuss network performance testing requirements for RLECs and other small recipients of high-cost support. WTA noted its AFR requested a substantial deferral of the start date for performance testing by RLECs and an opportunity for RLEC representatives to work with the Commission during the deferral period to develop more reasonable and practicable testing procedures for RLEC high-cost support recipients. They discussed the problem of availability, cost, and compatibility of the performance testing hardware and software that is currently being developed for RLECs and others that do not have the resources to construct their own. They expressed concerns about being able to pass speed and latency tests that encompass facilities over which they have no control, such as customer CPE, home WiFi usage, and middle mile facilities and routes. WTA also highlighted that the costs of performance testing reduce the net high-cost support available to RLEC recipients to upgrade and operate their broadband networks.
- USTelecom filed [a letter](#) on April 2, 2019, to express its view that granting Viasat’s Petition for Reconsideration to alter the voice testing methodology set forth in the Performance Metrics Order would undermine the integrity of the CAF program and its auction process. It said the Commission cannot now change the rules all bidders relied upon to suit a single winner unless it is prepared to rerun the entire auction. USTelecom asserted granting Viasat’s Petition now would call into question the auction results and encourage gaming of the rules in future auctions.

- Viasat filed a [letter](#) on April 3, 2019, to respond to ex partes filed by [Conexon](#) and [Hughes Network Systems](#) that discuss its [pending ETC application](#) and to USTelecom's [letter](#) on its [Petition for Reconsideration](#) on CAF performance metrics. Viasat argued none of these letters provides any basis for denying Viasat's federal Petition for designation as an ETC or its Petition for Reconsideration of the Performance Metrics Order, and it asked the Commission to expeditiously grant both petitions.

[Back to Highlights](#)

Broadband

- The FCC issued a [Public Notice](#) on April 1, 2019, seeking nominations for membership on the new Broadband Infrastructure Deployment Job Skills and Training Opportunities Working Group of the Broadband Deployment Advisory Committee. This new working group will provide advice and recommendations to the Commission and other stakeholders on ways to make more widely available and improve job skills training and development opportunities for the broadband infrastructure deployment workforce. Nominations are due April 15, 2019.
- The Senate Committee on Commerce, Science, and Transportation [has scheduled](#) a hearing entitled "Broadband Mapping: Challenges and Solutions," on April 10, 2019. Witnesses include: Tim Donovan, Competitive Carriers Association; Mike McCormick, Mississippi Farm Bureau Federation; Mike Obilzalo, Hood Canal Communications; Jonathan Spalter, United States Telecom Association; and Chip Strange, Ookla.
- Microsoft [met with](#) Chairman Pai's Special Counsel on March 27, 2019, to assert the Commission's broadband availability data appears to overstate the extent to which broadband is actually available throughout the nation. Microsoft suggested the Commission narrow the scope of its Form 477 data collection by asking carriers to report data measuring where they actually provide broadband service, versus areas they could serve. Microsoft also suggested that until the accuracy of the Form 477 broadband data is improved, the FCC could combine its subscription data with other third-party broadband data to compliment the Commission's survey data to provide a more complete picture of broadband availability.
- Reps. Susan Brooks (R-Ind.) and Paul Tonko (D-N.Y.) [announced](#) on April 4, 2019, they introduced H.R. 1328, [the ACCESS BROADBAND Act](#). They said this bill would establish an Office of Internet Connectivity and Growth at NTIA and direct this office to simplify access for small businesses and local communities, possibly including small business workshops and other support resources. They also said the bill would streamline processes for small businesses and local governments to apply for federal broadband assistance and improve coordination across government and the private sector.
[Fact sheet](#)

[Back to Highlights](#)

ICC

- CenturyLink [met separately with](#) Advisors to Commissioners O'Rielly and Carr on March 28 and April 1, 2019, to assert the Commission intended in the Transformation Order for its new VoIP-PSTN framework to encompass both fixed and nomadic VoIP. CenturyLink claimed the rule proposed by Verizon, that end office access charges should depend on whether the specific 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, and the precedent AT&T and Verizon rely on in support of their proposed rule in fact supports CenturyLink's position. CenturyLink further claimed AT&T and Verizon's argument that "over the top" traffic cannot be subject to end office access charges cannot be reconciled with how incumbent LEC tariffs, including AT&T's and Verizon's own tariffs, have applied for many years.
- West Telecom Services [met separately with](#) Advisors to Commissioners Starks, Rosenworcel, and Carr and Wireline Competition Bureau staff on March 27, 2019, to discuss its concern that over-

inclusive call blocking practices could lead to misidentification and blocking of important consumer messages. West reiterated its concerns with moving to a bill-and-keep regime for 8YY calling and the resulting loss of intercarrier compensation to competitive intermediate carriers, and noted its support of NTCA's position urging the Commission "to confine any action with respect to intercarrier compensation only to those areas in which clear and convincing evidence on the record confirms concerns exist with respect to particular practices or routing patterns." It also discussed implementation of the National Suicide Hotline Improvement Act.

Open Internet

- Chairman Pai [sent](#) letters to Sens. Edward Markey (D-Mass), Richard Blumenthal (D-Conn.), and Ron Wyden (D-Ore.) on March 29, 2019, in response to their letter that asked the Commission to investigate allegations that four major U.S. mobile carriers were throttling and prioritizing internet traffic without disclosing these practices to their customers. Pai said it appears the concern the senators have is the free data programs that certain providers offer, saying the Commission has never found these services to violate net neutrality rules. Pai also said he asked his staff to forward their request to the Federal Trade Commission which has the responsibility for policing these issues.

Universal Service

- Commissioner O'Rielly wrote a [blog post](#) on April 2, 2019, on an item circulating to Commissioners to begin a rulemaking that would establish an overall budget for the USF. O'Rielly said an overall cap is crucial despite the existence of individual caps on three of the four USF sub-programs, noting the Commission has repeatedly raised the budgets of those programs without being required to offset spending elsewhere. He said an overall budget would require the Commission to consider the cost-effectiveness of its spending decisions and the consequences of raising one program's budget for the entire USF enterprise. He said to the extent that raising the cap would be necessary in the future, the Commission would not be precluded from voting to do so, but said the choice to increase spending would be exercised in a much more transparent and accountable manner. He said the item's proposed budgetary cap of \$11.42 billion is well-above current disbursement levels, leaving almost a \$2 billion cushion for potential future spending.
- Chairman Pai sent [letters](#) to Sens. Edward Markey (D-Mass.) and Dan Sullivan (R-AK) on March 28, 2019, to respond to their [letter](#) to the Commission and USAC that expressed concern about how the transition of vendors for the processing of E-rate applications may impact the success of the program. Pai said to minimize disruption to schools and libraries and help ensure a smooth transition, the FCC's Wireline Competition Bureau and Office of the Managing Director staff have exercised close oversight of USAC's transition activities, including regular meetings with USAC staff to discuss and monitor the steps taken on operations, information technology, staffing, and stakeholder outreach.
- USAC submitted its [Annual Report](#) on March 29, 2019, which details USAC's operations, activities, and accomplishments for the prior year, including information about participation in each of the universal service programs and administrative action intended to ensure program integrity. USAC discussed highlights of its work in 2018, including: creating an 18-month roadmap for each program to ensure programmatic goals are met in a timely fashion; completion of the Connect America Fund Map initiative; and successful completion of the transfer of USF funds to Treasury.
- USAC filed its [Semi-Annual Audit Recovery Report](#) for the Schools and Libraries Program on April 1, 2019, which summarizes the status of all outstanding audit findings.
- The Wireline Competition Bureau issued a [Public Notice](#) on April 5, 2019, to announce the launch of the National Lifeline Eligibility Verifier for new enrollments in Alaska, American Samoa, Delaware, the District of Columbia, Maine, the Northern Mariana Islands, Rhode Island, and the U.S. Virgin Islands starting on May 7, 2019. ETCs in these states, territories, and the District of Columbia will be required to use the National Verifier to make eligibility determinations for all consumers applying for Lifeline service and must cease using legacy eligibility processes for prospective Lifeline subscribers.

- The National Lifeline Association [met with](#) Advisors to Chairman Pai, Commissioners Carr, O’Rielly, Starks, and Rosenworcel, and Wireline Competition Bureau staff on April 2, 2019, to discuss a number of pending Lifeline program issues. NaLA asserted the Commission must continue to work with USAC and Lifeline stakeholders to develop and implement service provider application programming interface connectivity to the National Verifier and must act to require USAC to secure access to the appropriate eligibility databases before hard launch of the National Verifier in any additional states. NaLA also said the Commission should prioritize access and affordability for consumers by stopping the voice support phase out and freezing minimum service standards.
- Reply comments were filed on April 1, 2019, on the [NPRM](#) that asked 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. [USTelecom](#) said if the Commission moves forward with its proposal to amend existing amortization that would apply to fiber-buildout special construction projects, it should also institute appropriate guardrails to ensure that the E-rate program does not provide subsidies for redundant networks in areas where there are comparable, competitive networks. [Funds for Learning](#) supported elimination of the amortization rule and said state programs would be hindered by return of the rule. [Educationssuperhighway](#) said the rule should be eliminated, and suggested the Commission need not change its special construction rules as the rules the Commission already has in place ensure that the most cost-effective solution is awarded. The [Wisconsin Department of Public Instruction](#) expressed support for the permanent elimination of the amortization rule, and disagreed with [NTCA](#) that under certain circumstances the Commission should remove the ability of schools and libraries to use E-rate funds to build and own their own fiber, saying this request is out of the scope of this notice. [All replies available to date](#)
- The Wireline Competition Bureau issued a [Public Notice](#) on April 4, 2019, seeking comment on TracFone’s [Amended Petition](#) seeking to expand its ETC designation to include tribal lands in Alabama, Connecticut, Massachusetts, New York, North Carolina, and Virginia. Comments are due April 22, 2019; replies are due April 29, 2019.
- WTA [met with](#) Commissioner Carr’s Advisor on April 2, 2019, to discuss its [comments](#) filed on the Supply Chain NPRM. WTA recommended the Commission use its expertise to study the matter further so the Commission and industry could have a complete grasp of the costs of a transition away from equipment prohibited by the [2019 National Defense Authorization Act](#). WTA asserted since this is a matter of national security, it believes any funding should be in the form of a Congressional appropriation rather than drawing money from the limited Universal Service Fund.
- The Wireline Competition Bureau issued a [Public Notice](#) on April 3, 2019, seeking comment on Tata Communications’ [Petition](#) for a waiver of section 54.706 on USF contributions or, alternatively, a waiver of the twelve percent threshold of the Limited International Revenue Exemption to allow Tata to continue contributing to the Universal Service Fund based solely on its interstate end-user telecommunications. Comments are due May 3, 2019; replies are due May 20, 2019.
- Liberty Cablevision of Puerto Rico filed an [ex parte](#) on April 2, 2019, to follow up on its [November 2018 meetings](#) with Chairman Pai and Commission staff when it discussed its recommendations for Stage 2 of the Uniendo a Puerto Rico Fund. Liberty claimed the CAM approach is not the most efficient or best-suited for the distribution of Stage 2 funding in Puerto Rico because its very structure is premised on the ability of the model to produce a precise location count and related per location high cost threshold. It suggested applicants for Uniendo funding should bear the primary responsibility for determining the number of locations in a given geographic area and proposed the Commission heavily weight bids for Stage 2 funding that seek the least amount of funding for the relevant Census block groups but without engaging a granular cost per location analysis.
- Hughes Network Systems [met with](#) Commissioner Carr’s Policy Advisor on April 1, 2019, to discuss its proposal for the award mechanism of the Uniendo a Puerto Rico Fund and the Connect USVI Fund. Hughes discussed the benefits of applying an objective, technology-neutral bidding framework to the distribution of universal service funds and the need for the final determinations to be made by a neutral

third-party arbiter. Hughes Network Systems also [met with](#) Commissioner O’Rielly’s Policy Advisor on April 4, 2019, to discuss the same issues.

- The Schools, Health & Libraries Broadband Coalition and counsel for the New England Telehealth Consortium, Connections Telehealth Consortium, and Catholic Health Initiatives [met with](#) Chairman Pai’s Special Counsel on March 28, 2015, to discuss issues in their March 15, 2019 [letter](#) that outlined concerns with the continuing problems with administration and oversight of the Rural Health Care programs. SHLB urged the Commission to complete the current rulemaking in the Rural Health Care program by June if possible with meaningful improvements to both the Telecommunications Program and the Healthcare Connect Fund.

[Back to Highlights](#)

Misc.

- The FCC issued the [agenda](#) on April 5, 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.
- The Pricing Policy Division of the Wireline Competition Bureau issued an [Order](#) on April 4, 2019, establishing procedures for the 2019 annual access charge tariff filings and Tariff Review Plans for ILECs. The Order: sets a modified effective date of July 2, 2019, for the 2019 annual access charge tariff filings; establishes the dates for filing petitions to suspend or reject an ILEC tariff filing and replies to such petitions; and partially waives for the second quarter of 2019 the universal service contribution factor rule to allow ILECs to charge the second quarter 2019 contribution factor until July 2, 2019, at which time they must begin charging the third quarter 2019 contribution factor.
- Comments were filed April 3, 2019, on the [NPRM](#) proposing to amend the Truth in Caller ID rules to implement the anti-spoofing provisions of the RAY BAUM’S Act. [ZipDX](#) said its previously-filed suggestion was for the Commission to incorporate into the Truth-in-Caller-ID rules the clear, objective, and unambiguous requirement that the number used as the Caller ID must be the one assigned to the caller or which the caller has permission to use. ZipDX said with this NPRM, the FCC should use all the tools at its disposal to make the rules as good as they can be and not “limit our proposals herein to those necessary to meet Congress’ statutory deadline to prescribe implementing regulations.” It asserted, given the FCC’s focus and depth of expertise, it is far better suited than Congress to determine exactly how the rules should read to have the maximum desired effect. The [Wisconsin Division of Trade and Consumer Protection](#) said telemarketing is its number one consumer complaint, and these calls hide behind spoofed and blocked numbers. It urged the FCC to: define terms and services broadly to anticipate future technology and methodologies; take leadership internationally; and pursue efforts to eliminate the use of technology to convey scare tactics designed to scam consumers through deceptive practices. [CTIA](#) supported the Commission’s proposed rules, and urged the Commission to use the definition of “text message” from the Wireless Messaging Declaratory Ruling. It also supported the FCC aggressively enforcing its rules, within and outside of the United States, and encouraged the Commission and other federal agencies to take even more steps to deter bad actors. [Comcast](#) supported the Commission’s proposal to amend its rules to incorporate statutory changes made as part of last year’s RAY BAUM’S Act. Comcast also suggested the Commission clarify that a provider originating a call in Internet Protocol must transmit the calling party name when initiating a call, in addition to the calling party number that originating providers already transmit. [Consumer Reports, the National Consumer Law Center, and Consumer Federation of America](#) urged

the FCC to ensure broad application of its rules on caller ID spoofing to voice and text communications. They also urged the FCC to require phone companies to implement caller ID authentication technology, set guidelines for and oversee its implementation, and ensure consumer representation on the SHAKEN/STIR governance board. [All comments available to date](#). Reply comments are due May 3, 2019.

- The Wireline Competition Bureau issued a [Public Notice](#) on April 3, 2019, to announce its intent to incorporate confidential and highly confidential information and data filed in response to the Commission's business data services [data collection](#) and public comments filed in the [BDS Second Further Notice and Further Notice](#) into the record of the USTelecom Forbearance Petition proceeding, subject to protective orders. Interested parties wishing to file an objection to the incorporation of their Highly Confidential and Confidential BDS Collection responses into the record of the USTelecom Forbearance Petition proceeding have until April 15, 2019 to do so.
- The FCC's Office of Economics and Analytics [released](#) a working paper on April 5, 2019, entitled "The Organization of Economists in Regulatory Agencies: Does Structure Matter?" The paper builds on a working group report that led to the creation of the Office of Economics and Analytics, which was formally established in December 2018. The paper concludes that organizational consolidation of economists into a single unit, much like the arrangement of the new OEA, can provide more independent and higher quality economic analysis within regulatory agencies.
- Senator John Thune (R-S.D.), Chairman of the Subcommittee on Communications, Technology, Innovation, and the Internet, announced on April 5, 2019, that the Subcommittee will hold a [hearing](#) on April 11, 2109, titled, "Illegal Robocalls: Calling All to Stop the Scourge." The hearing will examine the FCC's first report on robocalls and review the steps Congress is currently taking to provide consumers relief from illegal robocalls. Witnesses include: The Honorable Doug Peterson, Attorney General, State of Nebraska; Kevin Rupy, Partner, Wiley Rein, Representing US Telecom; and Margot Saunders, Counsel, National Consumer Law Center.
- Comcast [met with](#) Commissioner Starks' Legal Advisor on March 29, 2019, to discuss robocalls. Comcast claimed it has been at the cutting edge of innovation and leadership in this arena, not only through its implementation of robocall mitigation techniques authorized by the Commission and its offering of free blocking tools to its customers, but also through its role in developing the SHAKEN/STIR protocol and deploying the technology on its network. It highlighted the fact that in March, Comcast announced a major milestone in implementing SHAKEN/STIR - an industry-first exchange of authenticated calls with another provider (AT&T) in a real-world setting using phones on the companies' consumer networks.
- iconectiv [met with](#) Chairman Pai's Advisor, FCC Chief Technology Officer, and staff from the Consumer and Government Affairs and Wireline Competition Bureaus on March 27, 2019, to discuss the operational and design differences between the proposed database for reassigned numbers and the functions of the NANPA and Pooling Administration databases. It claimed requiring that the reassigned numbers database be acquired from the same entity that secures the long-term NANPA-PA Administrator contract will limit the number of potential companies interested in bidding on these contracts, with the likely result being increased costs to the Commission and the industry. It urged the Commission to take appropriate steps to ensure the NANC has the flexibility to recommend an approach that it deems best satisfies the goals.
- The House Appropriations Committee held [a hearing](#) on April 3, 2019, on the FCC's budget. Chairman Pai [testified](#), saying the Commission's Office of Management and Budget-designated spending level for FY20 is \$335,660,000, derived exclusively from regulatory fees for regular FCC operations and an auction spending cap of \$132,538,680. He said the priorities for next year are 5G, closing the digital divide, protecting public safety, and modernizing and reforming the Commission's media regulations. Commissioner Rosenworcel also [testified](#), saying this FCC budget request asks for less than the \$339,000,000 the agency is set to spend in the current fiscal year and is almost \$4,000,000 less than the budget level authorized by Congress. She said it would result in the smallest payroll in decades at a time when communications technologies loom larger than ever before in every aspect of civic and

commercial life. Rosenworcel said the most basic values in our laws, i.e., consumer protection, universal service, competition, and public safety, need refocus and attention by the FCC.

- The Consumer and Governmental Affairs Bureau issued Orders on Reconsideration on April 1, 2019, denying petitions filed by [Consumer Telcom](#), [U.S. Telecom Long Distance](#), and [Central Telecom Long Distance](#) that asked the Bureau to reconsider multiple orders finding the providers changed consumers' telecommunications service providers without proper authorization verified in accordance with the Commission's carrier change rules. The Bureau affirmed petitioners' actions violated the Commission's rules.
- The Consumer and Governmental Affairs Bureau issued an [Order on Reconsideration](#) on April 4, 2019, denying six petitions filed by Advantage Telecommunications that asked the Bureau to reconsider 23 orders finding that Advantage changed consumers' telecommunications service providers without proper authorization verified in accordance with the Commission's carrier change rules. The Bureau affirmed that Advantage's actions violated the Commission's rules.
- The Consumer and Governmental Affairs Bureau issued an [Order on Reconsideration](#) on April 4, 2019, denying three petitions filed by Reliant Communications that asked the Bureau to reconsider eight orders finding that Reliant changed consumers' telecommunications service providers without proper authorization verified in accordance with the Commission's carrier change rules. The Bureau affirmed that Reliant's actions violated the Commission's rules.
- The Consumer and Governmental Affairs Bureau issued an [Order](#) on April 2, 2019, granting 28 complaints alleging Tele Circuit Network changed complainants' telecommunications service providers without obtaining authorization and verification from complainants in violation of the Commission's rules. The Bureau said Tele Circuit must remove all charges incurred for service provided to complainants for the first 30 days after the alleged unauthorized change, and complainants are entitled to absolution for the charges incurred during the first 30 days after the unauthorized change occurred. The Bureau also said neither the complainants' authorized carrier nor Tele Circuit may pursue any collection against complainants for those charges.
- No comments were filed 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](#)
- iconectiv, formerly known as Telcordia Technologies, filed a [redacted version](#) of its Business Continuity Exercise Report for 2018 on April 3, 2019.

[Back to Highlights](#)

Upcoming Filing Dates

- 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 - Comments due on a 214 application filed by the shareholders of Price County Telephone to Norvado. Replies are due April 19, 2019. [Public Notice](#)
- Apr. 12 - PRA comments due on a request for extension of an information collection associated with Mobility Fund I support. [FR](#)
- Apr. 19 - Replies due on a 214 application filed by the shareholders of Price County Telephone to Norvado. [Public Notice](#)
- Apr. 22 - PRA comments due on a revision to an existing information collection in FCC Form 481. [FR](#)
- Apr. 22 - Comments due on TracFone's [Amended Petition](#) seeking to expand its ETC designation to include tribal lands in Alabama, Connecticut, Massachusetts, New York, North Carolina, and Virginia. Replies are due April 29, 2019. [Public Notice](#)
- 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](#)
- Apr. 29 - Replies due on TracFone's [Amended Petition](#) seeking to expand its ETC designation to include tribal lands in Alabama, Connecticut, Massachusetts, New York, North Carolina, and Virginia. [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 3 - Comments due on Tata Communications' [Petition](#) for a waiver of section 54.706 on USF contributions or, alternatively, a waiver of the twelve percent threshold of the Limited International Revenue Exemption. Replies are due May 20, 2019. [Public Notice](#)
- 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](#)
- May 20 - Replies due on Tata Communications' [Petition](#) for a waiver of section 54.706 on USF contributions or, alternatively, a waiver of the twelve percent threshold of the Limited International Revenue Exemption. [Public Notice](#)
- May 28 - PRA comments are due on an extension of a currently approved information collection associated with study area boundary data reporting in Esri shapefile format. [FR](#)

[Back to Highlights](#)

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