

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

### May 2, 2016 HIGHLIGHTS

- At its April 28, 2016 [Open Meeting](#), the FCC adopted a special access [Tariff Investigation Order and an FNPRM](#) that proposes a new technology-neutral regulatory framework for the provision of business data services that classifies markets as either non-competitive or as competitive. The FCC also adopted an [NPRM](#) containing proposals to support real-time text communications over IP networks to improve the accessibility of these networks for consumers who are deaf, hard of hearing, deaf-blind, and speech disabled, and an [Order on Reconsideration and a Second Report and Order](#) on making 150 megahertz available in the 3.5 GHz band.
- The FCC released the Lifeline [Third Report and Order, Further Report and Order, and Order on Reconsideration](#) that was adopted at the March Open Meeting to provide support for broadband.
- NECA filed [comments](#) to refresh the record on Sandwich Isles' October 2010 [Petition for Reconsideration](#) of the [2010 Declaratory Ruling](#) on Sandwich Isles' cable network lease costs, AT&T's October 2010 [Application for Review](#), and NECA's February 2015 [Petition for Clarification and/or Declaratory Ruling](#). Comments were also filed by [USTelecom](#), [AT&T](#), [SIC](#), and [The Sovereign Council of Hawaiian Homelands Assembly](#). Replies are due May 9. [Order](#)
- Numerous challenges to the competitive coverage data contained in v2.2 of the A-CAM were filed. [List of all challenges available to date](#). JSI and RLECs also filed [comments](#) on the issue of "split census blocks" that are located in multiple study areas and are being removed from A-CAM eligibility. [Public Notice](#).
- NTCA [said](#) the A-CAM treats neighboring ILECs in a "shared" census block as competitors, or attributes deployment to the other ILEC, even when those ILECs operate in distinct parts of that census block and there is, in fact, no geographic overlap between them.
- ATA, et al. [discussed](#) the proposed Alaska Infrastructure Fund, and said the AIF should be implemented on generally the same schedule as the A-CAM and the modified legacy reforms. Alaska Communications [offered conditions](#) for CETC support that it says would address concerns about middle mile constructed under the ATA proposal.
- Fairpoint [discussed](#) its Petition for Declaratory Ruling to restore LSS-related support amounts to its ICC Transitional Support for its RoR carriers in the 15 states where CAF Phase II model-based support has been accepted, retroactive to January 1, 2015.
- NTCA filed [reply comments](#) on Endeavor's [Petition for Clarification](#) on the separations freeze. Endeavor also filed a [reply](#).
- The House Energy and Commerce Committee [approved](#) bills requiring the FCC to publish on its website: [changes to its rules](#) within 24 hours after adoption; documents [to be voted](#) on by the FCC; and [items to be decided](#) on authority delegated by the FCC. The Senate Committee on Commerce, Science, and Transportation [approved The FCC Reauthorization Act of 2016](#) and [The Federal Communications Commission Process Reform Act of 2015](#).

---

#### Other Key Upcoming Dates

- May 9 - Replies [due](#) to refresh the record on petitions and applications for review of the 2010 [Declaratory Ruling](#) on Sandwich Isles' cable network lease costs.
- May 12 - Comments due on the [FNPRM](#) attached to the [Rate-of-Return USF Reform Order](#). Replies due June 13.  
Editor: [Teresa Evert](#) | Assistant Editor: [Shawn O'Brien](#)

## USF Reform

- Challenges to the competitive coverage data contained in v2.2 of the A-CAM were filed April 27 and 28, 2016. This version of the A-CAM is based on June 2015 FCC Form 477 data, and in the RoR USF Reform Order, the Commission concluded that the broadband coverage for unsubsidized competitors based on this data would be subject to a streamlined challenge process. [List of all challenges available to date](#). [Public Notice](#)
- JSI and a group of RLECs filed [comments](#) on April 28, 2016, on the challenges to competitive coverage of RLEC census blocks. They noted the pervasive issue of census blocks that are located in multiple study areas being removed from A-CAM eligibility because the blocks are considered partially served by another, subsidized ILEC. They argued the FCC must modify the data inputs for the A-CAM so that “split blocks” do not prevent eligible locations inhabited by rural Americans from receiving broadband services supported by A-CAM funding. They said it is obvious that neighboring ILECs are neither unsubsidized nor competitors, and should not be treated as an unsubsidized competitor in the A-CAM.
- NTCA [spoke via telephone](#) with Wireline Competition Bureau staff on April 21, 2016, to discuss the fact that the A-CAM treats neighboring ILECs in a “shared” census block as competitors, or attributes deployment to the other ILEC, even when those ILECs operate in distinct parts of that census block and there is, in fact, no geographic overlap between them. NTCA expressed concern that this issue will deny some companies that would otherwise be eligible for, and potential electors of, model-based support the ability to do so. NTCA urged some solution that could correct for this while still permitting consideration and resolution of model elections within the timelines initially contemplated.
- The Alaska Telephone Association [met via telephone](#) with Wireline Competition Bureau staff on April 21, 2016, and together with GCI, Matanuska Telephone Association, Copper Valley Telecom, Arctic Slope Telephone Association Cooperative, and GVNW met with Legal Advisors to Commissioners O’Rielly and Rosenworcel on April 21-22, 2016, to discuss the proposed Alaska Infrastructure Fund. They said the AIF should be implemented on generally the same schedule as the A-CAM and the modified legacy reforms. They discussed the process to include the AIF in the total rate-of-return budget, suggesting the support amount required for AIF should be deducted from the total amount available for disbursement for HCLS and CAF BLS after CAF ICC support is deducted and at the same time support for A-CAM is deducted. They also discussed an alternate methodology to develop broadband benchmark rates for Alaska and the Commission’s policy to “target high cost support efficiently to those areas that will not be served by private investment alone.” They also [met with](#) Wireless Telecommunications Bureau staff on April 21, 2016, to discuss similar issues.
- Alaska Communications filed a [letter](#) on April 29, 2016, stating it supports the RoR LECs in Alaska receiving frozen support for ten years, per the proposed Alaska plan, in exchange for broadband obligations and accountability safeguards that are established before support is distributed, but it believes the CETC portion of the ATA proposal raises serious concerns about whether high-cost support would be used in the public interest. It said the Commission should make a specific allocation of middle mile support for Alaska, and should adopt safeguards to hold CETCs accountable for, and ensure the public benefits from, their receipt of high-cost support for middle mile deployment. ACS proposed specific conditions for CETC support.
- Fairpoint [met with](#) Wireline Competition Bureau staff on April 18, 2016, to discuss FairPoint’s pending Petition for Declaratory Ruling to restore LSS-related support amounts to its ICC Transitional Support for its RoR carriers in the 15 states where CAF Phase II model-based support has been accepted, retroactive to January 1, 2015. FairPoint discussed the analysis presented in the attached slide presentation.
- Diode Communications filed a [letter](#) on April 25, 2016, to inform the FCC that it does not provide voice service in the census blocks listed in the attachment. Diode said it is a subsidiary of DTC Holding Company, and while other DTC subsidiaries may offer voice service in Nebraska, voice service is not

available to Diode subscribers directly or through another DTC subsidiary in the identified census blocks. Hamilton.net filed a similar [letter](#) on April 25, 2016, to inform the Commission that it does not provide voice service to any locations within the state of Nebraska. Hamilton.net indicated it is a subsidiary of Nedelco, a holding company, and while other Nedelco subsidiaries offer voice service, no Nedelco affiliate currently offers local end user voice service to subscribers outside of the Hamilton Telephone Company local exchange area.

- Allen's TV Cable Service filed a [letter](#) on April 28, 2016, to notify the FCC that Allen's has deployed broadband in the identified census blocks as of December 2015, which are not reflected in the Commission's database. Allen's said this information was filed in February 2016, but technical issues may have affected the Commission's ability to incorporate this information into its databases. Allen's requested the Commission incorporate these census blocks into the 477 database, and ensure that these areas are identified as served areas and therefore not subject to CAF Rate of Return support. Cox Communications also filed a [letter](#) providing a list of 1048 census blocks reported in Cox's December 2015 FCC Form 477 data that had not been previously reported. Cox said this is in response to the Wireline Competition Bureau's Notice inviting unsubsidized competitors to provide information about their FCC Form 477 June 2015 data as compared to their Form 477 December 2015 data.
- Telephone Company of Vermont, dba Fairpoint, filed a [letter](#) on April 28, 2016, to notify the FCC of errors it identified in its June 2015 FCC Form 477, identifying four census blocks that were mistakenly listed and are entirely within Shoreham's study area. Fairpoint said it does not provide voice and 10/1 broadband services to the census blocks listed. Farmers Mutual Telephone Company filed a similar [letter](#) on April 28, 2016, as did [Sharon Telephone](#) and [Center Junction Telephone](#), requesting the FCC use the corrected data for determining final A-CAM support and eligibility.
- Arapahoe Telephone Company filed a [letter](#) on April 27, 2016, to notify the FCC of changes it made to its FCC Form 477 filing on March 24, 2016, and requests that these most recent changes be incorporated into the forthcoming versions of the A-CAM.
- ViaSat [met with](#) Chairman Wheeler's Legal Advisor and Deputy Chief of the Telecommunications Access Policy Division on April 22, 2016, to discuss CAF Phase II and ViaSat's current 25/3 Mbps service offering and its forthcoming satellites, which it claimed will significantly increase the capacity and throughput of the ViaSat broadband network. ViaSat emphasized its support for an objective, and competitively neutral, market-based mechanism that distributes CAF support to the lowest cost bidder.

[Back to Highlights](#)

## Broadband

- The Wireline Competition Bureau issued an [Order](#) on April 29, 2016, denying requests for an extension of time to file comments on the [NPRM](#) proposing to establish privacy regulations for broadband ISPs filed by the Association of National Advertisers, the State Privacy & Security Coalition, the American Advertising Federation, et al., and the American Cable Association, et al. The NPRM proposes rules to implement the core principles of transparency, choice, and security to ensure that consumers: have the information needed to understand what data the BIAS provider is collecting and what it does with that information; can decide how their information is used; and are protected against the unauthorized disclosure of their information. Comments are due May 27; replies due June 27. [News Release](#)

[Back to Highlights](#)

## IP Transition

- The FCC released the [NPRM](#) that was adopted at the April 28, 2016 Open Meeting, containing proposals to facilitate a transition from outdated text telephone technology to real-time text

communication for people who are deaf, hard of hearing, speech disabled, and deaf-blind over IP-enabled networks and services. Comments are due 45 days after Federal Register publication; replies due 60 days after FR.

[Back to Highlights](#)

## USF

- The FCC released the [Third Report and Order, Further Report and Order, and Order on Reconsideration](#) on April 27, 2016, that was adopted at its March 31, 2016 Open Meeting to modernize and reform the Lifeline program. The Order, among other things, refocuses Lifeline support on broadband, and will, for the first time, support standalone broadband service, as well as bundled voice and data packages. The Order also establishes an independent National Eligibility Verifier to confirm subscriber eligibility, adopted a budget mechanism that will limit Lifeline's cost to ratepayers, and encourages entry of new Lifeline providers to supply broadband by creating a streamlined federal Lifeline Broadband Provider designation process. The initial budget will be set at \$2.25 billion and indexed to inflation.
- The Telecommunications Access Policy Division of the Wireline Competition Bureau issued an [Order](#) on April 25, 2016, granting the South Dakota PUC's [request](#) to withdraw its [Petition](#) for FCC concurrence in the redefinition of the service areas of four South Dakota RLECs. The South Dakota PUC had notified the FCC that Long Lines Wireless, the competitive carrier at issue, had relinquished its ETC designation. The FCC also dismissed the pending Petition.
- The Wireline Competition Bureau released a [Public Notice](#) on April 29, 2016, granting, denying, and dismissing various petitions related to actions taken by USAC on E-rate and rural health care. Petitions for reconsideration or applications for review of these decisions must be filed within 30 days of the Public Notice.
- The Michigan PSC filed a [letter](#) on April 26, 2016, notifying the FCC and USAC that on March 23, 2016, Nexus Communications requested that its ETC status to provide Lifeline support in Michigan be relinquished. The PSC also attached its orders granting the request.

[Back to Highlights](#)

## Misc.

- At its April 28, 2016 [Open Meeting](#), the Commission adopted a special access [Tariff Investigation Order and FNPRM](#) proposing a new regulatory framework for the provision of business data services. It also [adopted](#) an [NPRM](#) containing proposals to support real-time text communications over IP networks to improve the accessibility of these networks for consumers who are deaf, hard of hearing, deaf-blind, and speech disabled and an [Order on Reconsideration and a Second Report and Order](#) on making 150 megahertz available in the 3.5 GHz band. The FCC [deleted](#) from the agenda the 5 media-related consent agenda items, which were already adopted.
- The FCC issued a [News Release](#) on April 28, 2016, on the Order and FNPRM adopted at the Open Meeting resolving the investigation of AT&T, Verizon, CenturyLink and Frontier's special access tariffs. The FCC found that certain terms and conditions of these tariffs were unjust and unreasonable, and had the effect of decreasing facilities-based competition and inhibiting the transition to new technologies. These companies are required to withdraw the illegal terms of these tariffs and file new tariffs within 60 days of release of the Order. The FNPRM proposes a new regulatory framework for the provision of business data services to replace the existing rules with a new technology-neutral framework that classifies markets as either non-competitive or as competitive. The FNPRM seeks comments on, among other things: a set of de-regulatory measures in competitive markets; rules to safeguard customers in noncompetitive markets; a proposal that tariffs should not be used in the future as part of the regulation of broadband data service in either competitive or non-competitive markets;

and a proposed future periodic data collection to allow the Commission to update its identification of competitive and noncompetitive markets. The Order/FNPRM is not released yet. Statements issued by: Chairman [Wheeler](#) and Commissioners [Clyburn](#) and [Rosenworcel](#).

- NECA filed [comments](#) on April 28, 2016, to refresh the record on Sandwich Isles' October 2010 [Petition for Reconsideration](#) of the [2010 Declaratory Ruling](#) on Sandwich Isles' cable network lease costs, AT&T's October 2010 [Application for Review](#), and NECA's February 2015 [Petition for Clarification and/or Declaratory Ruling](#). NECA said its decision to exclude SIC's new cable lease costs from the NECA pools and the June 2009 annual tariff filing were made based on then-current facts, and said the record of this proceeding contains no new facts after the year 2010 that would illuminate the current use of the Paniolo cable system.
- Comments were filed on April 28, 2016, to refresh the record on Sandwich Isles' October 2010 [Petition for Reconsideration](#) of the [2010 Declaratory Ruling](#) on Sandwich Isles' cable network lease costs, AT&T's October 2010 [Application for Review](#), and NECA's February 2015 [Petition for Clarification and/or Declaratory Ruling](#). [USTelecom](#) urged the FCC to promptly rule in favor of the long pending Application for Review and, at a minimum, to clarify the Declaratory Ruling as requested by NECA. [AT&T](#) said its Application, or in the alternative NECA's Petition, should be granted, and said SIC's predictions that the residents of the Hawaiian Home Lands will no longer be assured of continued service should it be precluded from continued recovery the Paniolo lease fees are without merit. [SIC](#) said the Bureau should issue an Order directing NECA to include 100 percent of the Paniolo cable lease costs in the NECA pool immediately. The Sovereign Council of Hawaiian Homelands Assembly filed [comments](#) on April 22, 2016, asserting the fifty percent equitable just and justified allowance for the Paniolo cable should be the minimum threshold for the basis of funding support for telecommunication access to the Paniolo cable system. Replies are due May 9. [Order](#)
- NTCA filed [reply comments](#) on April 22, 2016, on Endeavor's [Petition for Clarification](#) that rate-of-return carriers who elected to freeze their category relationships in 2001 are permitted to directly assign costs to new categories of investment introduced subsequent to the inception of the freeze if that category is ordinarily directly assigned in accordance with the Part 36 rules. NTCA agreed with USTelecom and NECA that the Commission should promptly clarify for Endeavor and for the industry how such costs should be assigned in light of the separations freeze and Part 36 rules. NTCA also urged the Commission to take action consistent with its 2014 proposal to open a window during which all affected companies can update their cost category relationships to better reflect current investment and expense levels. Endeavor had also filed a [reply](#). [Public Notice](#)
- AT&T [met separately](#) with Legal Advisors to Chairman Wheeler and Commissioners Pai, Rosenworcel, Clyburn, and O'Rielly, the FCC General Counsel, and Wireline Competition Bureau staff on April 22, 2016, to discuss business data services. AT&T asserted data shows that business data services are highly competitive and that the MSA-based trigger system accurately reflected competition for the most part, and in some areas was actually under-inclusive. AT&T also discussed its DS1 tariffs, and asserted they do not lock in customers.
- Windstream [spoke separately](#) with Commissioners Clyburn and Rosenworcel on April 21, 2016, to discuss the importance of near-term action to address last-mile wholesale access. Windstream asserted that last-mile access costs paid to the large ILECs are by far the largest part of its costs of providing enterprise business data solutions. Windstream asserted it is now seeing situations in which the ILECs are setting Ethernet retail prices below the wholesale rates they charge Windstream for merely one piece of an end-to-end connection for the same type of service. Windstream urged the Commission to remain open to exploring a variety of options for ensuring there are more than two business data services providers on a widespread basis.
- Comcast filed a [letter](#) on April 26, 2016, responding to questions from Commission staff and supplementing its March 25, 2016 [letter](#) on its data transmission and Internet access services for business customers. Comcast said when it responded to Section II.A.3 in its special access data submission based on its good-faith understanding of the defined term "Location," subsequent discussions with Commission staff made it clear that Comcast should have reported additional

“Locations” that were (as of 2013) connected to nodes that had been physically upgraded to enable the provision of Ethernet-over-HFC service. Comcast said it is willing to work with Commission staff to provide an updated estimate of such an expanded number of “Locations,” subject to constraints on the availability of historical data.

- Public Knowledge [spoke separately](#) with Legal Advisors to Chairman Wheeler and Commissioner Rosenworcel on April 21, 2016, to urge the Commission to adopt the business data service FNPRM and to adopt a final Order in 2016. Public Knowledge also expressed support for the [framework](#) for BDS regulation proposed by INCOMPAS and Verizon, which permits the Commission to ensure that where the BDS market is not competitive, business customers, wholesale customers, and ultimately consumers aren’t forced to pay unjustifiable or unreasonable BDS rates.
- Level 3 [met with](#) Matt DelNero, Chief of the Wireline Competition Bureau, on April 21, 2016, to reiterate its support for Chairman Wheeler’s proposal to declare ILECs’ “all-or-nothing” commitment plans for business data services to be unlawful, as well as the Chairman’s proposal to limit the excessive penalties ILECs impose in connection with such services. Level 3 urged the Commission to adopt a “fresh look” for customers bound by these lock-up provisions.
- The House Energy and Commerce Committee [approved](#) several telecom-related bills on April 28, 2016, including: a [bill](#) requiring the FCC to publish on its website changes to the rules of the Commission not later than 24 hours after adoption; a [bill](#) requiring the FCC to publish on its website documents to be voted on by the Commission; and a [bill](#) requiring identification and description on the FCC’s website of items to be decided on authority delegated by the Commission.
- The Senate Committee on Commerce, Science, and Transportation [held an executive session](#) on April 27, 2016, approving [S. 2644](#), The FCC Reauthorization Act of 2016, and [S. 421](#), The Federal Communications Commission Process Reform Act of 2015.
- Telcordia, d/b/a iconectiv, and the NAPM filed oppositions on April 25, 2016, to Neustar’s [Application for Review](#) of the Wireline Competition Bureau’s March 31, 2016 [Second Protective Order](#) in the LNP Administrator transition docket. Neustar had claimed this Order precludes all telecommunications industry personnel, with the exception of those that work for members of the NAPM, from reviewing the terms of the proposed Master Services Agreement between the NAPM and iconectiv. [iconectiv](#) claimed releasing the MSA would effectively reveal the contents of its bid and give Neustar an unfair competitive advantage if the contract were to be rebid, which is a result that Neustar is currently seeking in the D.C. Circuit. The [NAPM](#) claimed Neustar’s Application is now moot because the NAPM and iconectiv have filed a new version of the MSA with fewer redactions than the original filing contained. The NAPM urged the Commission not to let Neustar’s filing become a distraction from promptly approving the new MSA.
- Telcordia [spoke with](#) Chairman Wheeler’s Special Counsel and Legal Advisors to Commissioners Clyburn, Rosenworcel, and Pai on April 25- 26, 2016, to inform the FCC that the NAPM was filing a “Redacted for Public Inspection” version of the Master Services Agreement. Telcordia also said it was filing an [opposition](#) to Neustar’s [Application for Review](#), which it claims is meritless, and said the FCC’s [Second Protective Order’s](#) additional safeguards for security information are appropriate and well within the Commission’s discretion.
- The LNP Alliance [spoke with](#) Wireline Competition Bureau staff on April 25, 2016, to review the LNP Alliance’s April 11, 2016 meeting with the Transition Oversight Manager and to discuss the need for greater transparency in the review of the iconectiv agreement with the NAPM, which is currently on circulation at the Commission. The LNP Alliance discussed the concerns of smaller companies with the LNP transition, and said its members remain concerned that the transition will be used as an excuse to disrupt the networks of smaller carriers and impose testing and transition costs that exceed any putative savings.
- Public Knowledge, the Open Technology Institute at New America, and the LNP Alliance filed a [letter](#) on April 23, 2016, to request that the FCC “closely scrutinize” the iconectiv Code of Conduct, including

iconectiv's recent edits to that document, and the Voting Trust. They also asked the FCC to adopt a more transparent and open process for the review of the iconectiv Master Service Agreement currently circulating for Commission approval. They provided a redline version of the LNPA Code of Conduct that compares the previously filed version with the revised version of that Code filed by iconectiv on April 1, 2016.

- Telcordia, d/b/a iconectiv, [spoke with](#) Chairman Wheeler's Special Counsel and Legal Advisors to Commissioners Clyburn and Rosenworcel on April 25, 2016, to discuss a complaint filed in New Jersey Superior Court in the case of Michael Stern v. Telcordia Technologies, et al. Telcordia claimed it investigated the plaintiff's allegations of non-compliance with certain obligations, and found them to be meritless. Telcordia asserted its investigation concluded that the individuals hired during the time in question met all applicable obligations, and strongly disputed all the allegations in the complaint.
- The FCC's Managing Director issued a [Public Notice](#) on April 25, 2016, announcing the Commission's upcoming plans to modify the Commission's Registration System (CORES), which will take effect on or about September 1, 2016. These changes will: implement a requirement for existing and new users to designate user-specific IDs to access FCC Registration Numbers and related records; allow registrants to establish multiple Usernames for each FRN with different levels of access; require users to provide a valid e-mail address for online access to the system; and establish password-recovery security questions specific to each user. Additional details about these modifications can be found on the CORES website at <https://apps.fcc.gov/cores/publicHome.do?help=true>.
- The Wireless Telecommunications Bureau issued a [Public Notice](#) on April 29, 2016, seeking comment on competition in the mobile wireless marketplace for the FCC's Nineteenth Annual Report on the State of Competition in Mobile Wireless, including Commercial Mobile Radio Services. The Bureau seeks to update the information and metrics used in the [Eighteenth Report](#) for its analysis of competition in the mobile wireless marketplace for the Nineteenth Report. Comments are due May 31; replies due June 15.
- The FCC published in the [Federal Register](#) on May 2, 2016, the [Public Notice](#) that was issued on February 22, 2016, seeking comment on whether certain docketed Commission proceedings listed in the attachment to the Public Notice should be terminated as dormant. The Bureau said to the extent that a particular proceeding includes a petition addressing the merits or other pending pleadings, a party's failure to file comments in response to this Public Notice will be construed as consent to termination of that proceeding. A party aggrieved by a docket termination may file a petition for reconsideration with the CGB or an application for review with the full Commission. Comments are due June 1; replies due June 16.

[Back to Highlights](#)

## Upcoming Filing Dates

- May 3 - PRA comments due on an extension of a currently-approved collection associated with section 64.1903, which requires ILEC's international, interexchange affiliate to maintain books of account separate from such ILEC's local exchange and other activities. [Notice](#)
- May 3 - PRA comments due on an extension of a currently-approved collection associated with the May 2000 CALLS [Report and Order](#). [Notice](#)
- May 9 - Replies due to refresh the record on Sandwich Isles' [Petition for Reconsideration](#) of the [2010 Declaratory Ruling](#) on Sandwich Isles' cable network lease costs, AT&T's [Application for Review](#) of the Declaratory Ruling, and NECA's [Petition for Clarification and/or Declaratory Ruling](#) of the provisions of the 2010 [Declaratory Ruling](#). [Public Notice](#) | [Order](#)
- May 12 - Comments due on the [FNPRM](#) attached to the March 30, 2016 [Rate-of-Return USF Reform Order](#). The FNPRM seeks comments on proposed rule changes to the FCC's accounting and affiliate

transaction rules for ratemaking and USF support purposes “to eliminate inefficiencies and provide guidance to rate-of-return carriers regarding the FCC’s expectations for appropriate expenditures.” Replies due June 13. [FR](#)

- May 25 - Petitions for Reconsideration due on the RoR USF Reform [Order](#).
- May 25 - PRA comments [due](#) on Form 481 revisions to reflect reporting requirements for price cap carriers for CAF Phase II support, for recipients of RBE support, a reasonably comparable rate certification for broadband for high-cost support recipients, and an E-rate bidding certification for Phase II model-based support and RoR carrier high cost recipients.
- May 27 - Comments due on the [NPRM](#) on establishing privacy regulations for broadband ISPs to implement section 222 of the Communications Act. Replies due June 27. [News Release](#)
- May 31- Comments due on competition in the mobile wireless marketplace for the FCC’s Nineteenth Annual Report on the State of Competition in Mobile Wireless, including CMRS. Replies due June 15. [Public Notice](#)
- June 1- Comments due on whether certain docketed Commission proceedings should be terminated as dormant. Replies due June 16. [Federal Register](#) | [Public Notice](#)
- June 13 - Replies due on the [FNPRM](#) attached to the March 30, 2016 [Rate-of-Return USF Reform Order](#), The FNPRM seeks comments on proposed rule changes to the FCC’s accounting and affiliate transaction rules for ratemaking and USF support purposes “to eliminate inefficiencies and provide guidance to rate-of-return carriers regarding the FCC’s expectations for appropriate expenditures.” [FR](#)
- June 15 - Replies due on competition in the mobile wireless marketplace for the FCC’s Nineteenth Annual Report on the State of Competition in Mobile Wireless, including CMRS. [Public Notice](#)
- June 16 - ILEC tariffs due, for those filing on 15 days’ notice. Petitions to suspend or reject tariff filings due June 23; replies due June 27. [Order](#)
- June 16 - Replies due on whether certain docketed Commission proceedings should be terminated as dormant. [Federal Register](#) | [Public Notice](#)
- June 20 - PRA comments due on the proposed information collection requirement in the [NPRM](#) on establishing privacy regulations for broadband ISPs to implement section 222 of the Communications Act. [published](#)
- June 24 - Petitions for court review due on the RoR USF Reform [Order](#).
- June 27 - Replies due on the [NPRM](#) on establishing privacy regulations for broadband ISPs to implement section 222 of the Communications Act. [News Release](#)

[Back to Highlights](#)

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