

NECA's Weekly Federal Regulatory Summary

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May 11, 2020 HIGHLIGHTS

- The FCC issued the [agenda](#) for its May 13, 2020 Open Meeting, and will consider four items, including a [report and order](#) that would realign the 900 MHz band to create a new six megahertz broadband segment, and a [report and order and NPRM](#) on regulatory fees.
- The Rural Broadband Auctions Task Force, Wireline Competition Bureau, and the Office of Economics and Analytics [announced](#) they are ready to authorize CAF Phase II support for 105 winning bids.
- NTCA [expressed concerns](#) about the impacts of a resurgent budget control mechanism on RLECs receiving cost-based CAF-BLS and/or High Cost Loop Support, claiming it will result in the reduction of tens of millions of dollars of universal service support for several hundred small providers.
- Frontier [responded](#) to [NTCA](#), [NRECA](#) and [WISPA](#), which questioned claims made in Frontier's challenge to the list of census blocks deemed initially eligible in the RDOF Phase I auction.
- The USDA [announced](#) it invested \$23 million in New Mexico to provide broadband service in unserved and underserved rural areas, invested \$71 million in [Kansas and Oklahoma](#), and \$2 million in [New Hampshire](#). The funding is through the [USDA's ReConnect Pilot Program](#).
- Sen. Edward Markey (D-Mass.) [introduced](#) a [bill](#) that would instruct the FCC to update the [National Broadband Plan](#).
- Rep. Collin Peterson (D-Minn.), et al. [introduced](#) the Universal Broadband Act, which expands the USF contribution base to include broadband services, rather than solely from telephone services.
- An NTCA-commissioned [paper](#) examined assertions that broadening the base of contributions to the USF would undermine broadband adoption and retention. [press release](#)
- The Commerce Department's Economic Development Administration [is accepting](#) applications from eligible grantees for CARES Act supplemental funds, and may include deployment of broadband for purposes of telehealth and remote learning for job skills, among other things.
- Sens. Shelley Moore Capito (R-W.Va.) and Joe Manchin (D-W.Va.) introduced the [Eliminating Barriers to Rural Internet Development Grant Eligibility Act](#), which would remove obstacles for broadband projects to receive Economic Development Administration grants. [press release](#)
- The Senate Commerce Committee will [hold a hearing](#) on May 13, 2020, to examine the initiatives led by the FCC to maintain and expand broadband connections to all Americans during the pandemic.
- Comments [are due](#) May 20, 2020, on the applicability of section 4 of the Secure Networks Act to the FCC's rulemaking on protecting against national security threats to the communications supply chain. Replies are due June 4, 2020. [public notice](#)

Other Key Upcoming Dates

- May 15 - Comments due on the [FNPRM](#) on additional measures to address illegal spoofing. Replies are due May 29, 2020.
- May 18 - Oppositions due to petitions for reconsideration of the RDOF [report and order](#). Replies are due May 26, 2020. [public notice](#) | [FR](#)

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USF Reform

- The Rural Broadband Auctions Task Force, Wireline Competition Bureau, and the Office of Economics and Analytics issued a [public notice](#) on May 4, 2020, announcing they are ready to authorize CAF Phase II Auction 903 support for the 105 winning bids identified in attachment A of the public notice and the identified applicants must submit the required letter(s) of credit and legal counsel opinion letter(s).
- NTCA [spoke with](#) Chairman Pai's rural broadband advisor and Wireline Competition Bureau staff on May 6, 2020, to express concerns about the impacts of a resurgent budget control mechanism on RLECs receiving cost-based CAF-BLS and/or High Cost Loop Support. NTCA said USAC recently published an estimate of the revised budget control mechanism, in which NTCA claimed will result in the reduction of tens of millions of dollars of universal service support over the following 12 months for several hundred of the smallest operators. NTCA requested that the effectiveness of the budget control be suspended for the pendency of the COVID-19 pandemic. NTCA also urged the Commission to act upon the pending rulemaking related to the BCM.
- Frontier filed a [letter](#) on May 1, 2020, to respond to [NTCA, NRECA and WISPA](#), which questioned claims made in Frontier's challenge to the list of census blocks deemed initially eligible in the RDOF Phase I auction. Frontier confirmed the vast majority of the census blocks listed in its challenge represent existing builds, including those undertaken as part of the CAF II program over the past five years. Frontier said although these census blocks will not be eligible for RDOF Phase I, they remain high cost, and Frontier will not be eligible for ongoing high-cost support in these areas. Frontier said to the extent individual homes in portions of some of these census blocks are unserved at speeds of 25/3 Mbps, Frontier, and members of NTCA, NRECA, and WISPA will be able to bid on these areas when mapping is complete and RDOF Phase II is implemented.
- Silver Valley Economic Development Corporation filed a [letter](#) on May 1, 2020, to state it shares the concerns of [WISPA and NRECA](#) on Frontier's challenge to the list of census blocks deemed initially eligible in the RDOF Phase I auction. Silver Valley said Frontier's reporting of upgraded service requires further explanation and suggested the FCC require Frontier to verify its service upgrade of voice and 25/3 Mbps broadband service of the Idaho census blocks it wants to exclude from the RDOF auction.
- Conexon filed a [letter](#) on May 5, 2020, to respond to Frontier's challenge to the list of census blocks deemed initially eligible in the RDOF Phase I auction. Conexon claimed Frontier is attempting to remove \$1.28 billion in eligible areas in the RDOF Phase I auction, which comprise over 47% of all the challenges. It asserted the Frontier data raises enough doubts about its accuracy to be set aside by the Commission. It also suggested that given the time limitations of the challenge process the best course is to dismiss all copper- and spectrum-based challenges, claiming nearly all such challenges are suspect.
- Reid Consulting Group, consultant for the Buckeye Hills Regional Council, filed a [letter](#) on May 4, 2020, to respond to Frontier's challenge to the list of census blocks deemed initially eligible in the RDOF Phase I auction. Buckeye Hills asserted Frontier's pending exclusion request would be devastating, further delaying crucial broadband upgrades and likely deterring bidders from participating. Buckeye Hills claimed in Ohio, Frontier's challenge would eliminate an additional 1,000 square miles from RDOF Phase I, and asked the FCC to reject Frontier's challenge.
- BPS Networks filed a [letter](#) on May 6, 2020, to reply to SEMO Electric Cooperative, et al.'s [letter](#) that suggested the FCC investigate the claims made by BPS' challenge to the list of census blocks deemed initially eligible in the RDOF Phase I auction.
- Central Electric Cooperative filed a [letter](#) on May 6, 2020, to reply to Pro Value.Net's challenge to the list of census blocks deemed initially eligible in the RDOF Phase I auction. Central Electric asserted

Pro Value.Net does not offer interconnected VoIP-based voice services and cannot offer 25/3 Mbps broadband service in the 17,478 census blocks identified in its challenge.

- Moffat County, Colorado filed a [letter](#) on May 5, 2020, to respond to Zirkel Wireless' challenge to the list of census blocks deemed initially eligible in the RDOF Phase I auction. Moffat County said this challenge seeks to remove 545 census blocks in Northwest Colorado from the RDOF auction, which include the removal of 100% of the blocks in Moffat County. It urged the FCC not to remove these blocks from the RDOF auction and claimed these areas are not currently served with reliable broadband and Zirkel's inaccurate representation should not prohibit these areas from participating in this auction for reliable services.
- ADTRAN filed a [letter](#) on May 6, 2020, to respond to Hughes Network Systems' [letter](#) on Hughes' proposal that the Commission allow RDOF auction bidders to use multiple technologies within each bidding area. ADTRAN asserted Hughes' efforts to clarify its proposal and respond to ADTRAN raises even more questions and complexities. ADTRAN also claimed Hughes' request to significantly alter the RDOF framework is procedurally defective and urged the Commission to reject Hughes' proposal.
- No replies were filed on Johnson Telephone Company's [petition for waiver](#) of the ruling in the RDOF [report and order](#) that CAF Phase II auction participants that subsequently defaulted on their entire award will be barred from participating in the RDOF auction. [public notice](#)

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ICC

- Bandwidth [met with](#) Wireline Competition Bureau and Office of Economics and Analysis staff on April 29, 2020, to discuss 8YY access reform. It expressed support for USTelecom's access charge reform [proposal](#), but asserted that even if the Commission adopts the proposal, traffic pumping of fraudulent toll free calls will persist. Bandwidth proposed the FCC take stronger enforcement actions against bad actors and those who carry their traffic and consider additional reforms.
- Intrado Communications [spoke with](#) Wireline Competition Bureau staff and Chairman Pai's legal advisor on April 30, 2020 and May 1, 2020, to provide updates on Intrado's efforts in response to COVID-19, and on call authentication and call-blocking associated with fraud-calling mitigation and prevention. Intrado also discussed 8YY access charge reform and asserted any reversal of 8YY access charge directionality (originating-to-terminating) is flawed since it would eliminate middle-mile competition by eliminating compensation to that class.

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Broadband

- The USDA [announced](#) on May 5, 2020, it has invested \$23 million in New Mexico to provide broadband service in unserved and underserved rural areas. The USDA said Pueblo of Acoma will invest a \$942,955 grant to help provide fixed wireless broadband, Penasco Valley Telephone will use a \$3.1 million grant to deploy a fiber broadband network, and E.N.M.R. Telephone will use a \$19.2 million grant to help build a FTTP network. The funding is through the [USDA's ReConnect Pilot Program](#).
- The USDA [announced](#) on May 7, 2020, it has invested \$71 million to provide broadband service in unserved and underserved rural areas in Kansas and Oklahoma. The USDA said Totah Communications, KanOkla Shidler, Cross Cable Television, and Carnegie Telephone will use this funding construct FTTP infrastructure. The USDA also [announced](#) it invested \$2 million to provide broadband service in unserved and underserved rural areas in New Hampshire. The USDA said Granite State Telephone will use this funding a \$2 million to build fiber. The funding is through the [USDA's ReConnect Pilot Program](#).

- Sen. Edward Markey (D-Mass.) [announced](#) on May 7, 2020, he introduced the [National Broadband Plan for the Future Act](#). The bill would instruct the FCC to update the [National Broadband Plan](#) and assess the nation's progress, provide detailed proposals to further increase internet access, and analyze how Americans' reliance on broadband during the coronavirus pandemic will shape the country moving forward.
- Rep. Collin Peterson (D-Minn.) [announced](#) on May 5, 2020, that he, and Reps. Don Young (R-Alaska), T.J. Cox (D-Calif.), Hal Rogers (R-Ky.), Angie Craig (D-Minn.), et al. introduced the Universal Broadband Act, which expands the USF contribution base to include broadband services, rather than solely from telephone services. The bill would, among other things: require the FCC to set the contribution rate as needed to meet universal service goals and serve all Americans; create reporting requirements to ensure the FCC is meeting their build out goals; and prioritize unserved areas, and further ensure tribal areas are served.
- An NTCA-commissioned [paper](#) was released on May 7, 2020, which examined assertions that broadening the base of contributions to the USF would undermine broadband adoption and retention. NTCA said the paper concludes that the impacts of including a USF-related contribution surcharge equal to a 1% increase in the price paid for broadband could reduce broadband demand by 0.08%. The paper observed this estimated potential reduction in broadband purchases does not take account of any potential gains in adoption realized and sustained as a result of programs supported by a more stable USF. [press release](#)
- U.S. Secretary of Commerce Wilbur Ross [announced](#) on May 7, 2020, the Commerce Department's Economic Development Administration is accepting applications from eligible grantees for CARES Act supplemental funds. The CARES Act provides EDA with \$1.5 billion of which \$1.467 billion is available for grant making. Examples of projects that EDA may fund through its CARES Act recovery assistance include constructing public works and facilities that will support economic recovery, including the deployment of broadband for purposes including supporting telehealth and remote learning for job skills, among other things.
- Sens. Shelley Moore Capito (R-W.Va.) and Joe Manchin (D-W.Va.) introduced the [Eliminating Barriers to Rural Internet Development Grant Eligibility \(E-BRIDGE\) Act](#) on May 7, 2020, which would remove obstacles for broadband projects to receive Economic Development Administration grants. The bill would: eliminate barriers to investments in broadband in distressed communities, making them eligible for EDA grants; clarify eligible recipients may include public-private partnerships and consortiums to leverage private sector expertise in project development; provide flexibility in the procurement process to account for limited availability of broadband services in distressed communities; clarify funds can be combined with other federal resources; and provide flexibility on accounting for in-kind methods to meet non-federal cost share. [press release](#)
- The Senate Commerce Committee [announced](#) on May 6, 2020, it will hold a hearing entitled *the State of Broadband Amid the COVID-19 Pandemic* on May 13, 2020, to examine the ongoing initiatives led by the FCC to maintain and expand high-speed and reliable broadband connections to all Americans during the pandemic. Witnesses include Steven Berry of the Competitive Carriers Association, Shirley Bloomfield of NTCA, and Jonathan Spalter, of USTelecom.
- Sens. Kamala Harris (D-Calif.), Ron Wyden (D-Ore.), and Cory Booker (D-N.J.) sent a [letter](#) to Comcast on May 7, 2020, to urge it to open Comcast-operated public WiFi networks to allow students who lack internet access at home internet access. They also asked Comcast to respond to questions to help Congress assess Comcast's ability to open up public WiFi networks to benefit students. [press release](#)
- The Rebuild Rural coalition sent a [letter](#) to Sens. Mitch McConnell (R-Ky.) and Charles Schumer (D-N.Y.) and Reps. Nancy Pelosi (D-Calif.) and Kevin McCarthy (R-Calif.) on May 6, 2020, advocating for increased rural infrastructure funding in any future COVID-19 relief packages. They called on Congress to ensure rural communities have access to clean and safe drinking water and wastewater facilities,

reliable and affordable power, healthcare, housing, and broadband and research institutions with state-of-the-art facilities, among other things. [press release](#)

- The FCC [announced](#) on May 5, 2020, Rep. Brenda L. Lawrence (D-Mich.) and Commissioner Starks will virtually host *Connecting Michigan: From Internet Inequality to Digital Equity* on May 7, 2020. This event will explore how the digital divide has exacerbated already existing inequities that impact the city of Detroit and other similarly situated cities in Michigan and throughout the United States. Panelists will present solutions for addressing the digital divide on a local, state, and federal level and will particularly focus on the matter of connecting children, low-income communities, and communities of color to affordable and reliable broadband. This event will be livestreamed at www.fcc.gov/live.
- Next Century Cities [spoke with](#) Chairman Pai's advisors on April 30, 2020, to discuss challenges in connectivity during the COVID-19 pandemic. It asserted the national minimum broadband speeds are not sufficient to satisfy the current demands placed on residential networks and urged the Commission to consider raising the minimum standards. Additionally, it asked the Commission to clarify definitions of rural and urban areas for the purposes of obtaining funds for broadband deployment.
- Barbara Esbin, Deputy Chief Consumer and Governmental Affairs Bureau, filed a [letter](#) on May 7, 2020, detailing a February 13, 2020 meeting with Tribal leaders and other Tribal representatives affiliated with the National Congress of American Indians and Chairman Pai, the FCC Commissioners and staff from the Consumer and Governmental Affairs and Wireless Telecommunications Bureaus. They discussed access to spectrum over Tribal lands, broadband deployment data collection, the RDOF, and other issues.

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Open Internet

- Chairman Pai sent [letters](#) to 28 Senators on April 27, 2020, to respond to their letter on the D.C. Circuit [decision](#) upholding the Commission's [repeal](#) of net neutrality rules. They asked the Commission to consider how a decision to repeal the Open Internet Order could negatively impact public safety, universal access, and broadband competition. Pai said pursuant to the court's remand, the FCC has sought comment on how the order could affect public safety, pole attachments and Lifeline.

Other Universal Service Programs

- The FCC [announced](#) on May 6, 2020, it has approved a fifth set of COVID-19 telehealth program applications in the amount of \$11.19 million for providers in California, Texas, Ohio, Vermont, Pennsylvania, Arizona, Connecticut, Maryland, Massachusetts, Oregon, New York, North Carolina, and New Jersey.
- The FCC issued a [public notice](#) on May 8, 2020, announcing petitions for reconsideration of the [report and order](#) adopting a \$200 million COVID-19 telehealth program were filed by the [American Hospital Association](#) and the [American Dental Association](#). Oppositions to petitions are due 15 days after publication of this notice in the Federal Register; replies are due within 10 days after oppositions are due.
- The American Hospital Association filed a [letter](#) on May 7, 2020, to urge the Commission to expedite approval of its [petition](#) for reconsideration of the [report and order](#) adopting a \$200 million COVID-19 telehealth program. AHA asserted recent statements by Commissioners O'Rielly and Carr indicate the Commission is open to the request, and that members of the health care community have expressed support for the petition.

- The Rural Hospital Coalition filed a [letter](#) on May 5, 2020, to express support for the American Hospital Association's [petition](#) for reconsideration of the [report and order](#) adopting a \$200 million COVID-19 telehealth program.
- The National Association of Accountable Care Organizations sent a [letter](#) to Chairman Pai on May 6, 2020, to express support for the American Hospital Association's [petition](#) for reconsideration of the [report and order](#) adopting a \$200 million COVID-19 telehealth program.
- Critical Hub Networks filed a [letter](#) on May 4, 2020, to discuss its [joint petition](#) seeking to waive or modify the current letter of credit requirements mandated for the Uniendo a Puerto Rico and Connect USVI Fund. Critical Hub provided information on a recent earthquake in Puerto Rico, which it said illustrated the need for hardened networks in the region and the need for the Commission to facilitate competition for the Puerto Rico fund.
- Comments were filed on May 5, 2020, on a [petition](#) seeking a study area waiver on the transfer of the Browning, Montana exchange from 3 Rivers to SiyCom, and on SiyCom's [petition](#) seeking ETC designation in the exchange. [Alexicon](#) expressed support for both petitions and asserted SiyCom will serve the public interest as an ETC and broadband provider serving un- and underserved Native Americans on the Blackfeet Reservation. Replies are due May 20, 2020. [public notice](#)

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Misc.

- The FCC issued the [agenda](#) on May 6, 2020, for its May 13, 2020 Open Meeting. The FCC will consider: a [report and order](#) that would realign the 900 MHz band to create a new six megahertz broadband segment to support the growing technological needs of the nation's industries, while reserving the remaining four megahertz of the band for narrowband operations; a [second report and order and report and order](#) addressing rules to facilitate the deployment of geostationary-satellite orbit and non-geostationary-orbit fixed-satellite service earth stations that operate while in motion; a [report and order](#) that would modernize and simplify the written and on-air public notices broadcasters must provide upon the filing of certain applications; and a [report and order and NPRM](#) that would level the playing field between domestic and foreign licensed space stations by assessing a regulatory fee on non-U.S. licensed space stations with United States market access, and would initiate the Commission's annual regulatory fee proceeding. Due to the pandemic this meeting will be in a wholly electronic format, and the items are expected to be voted prior to the meeting.
- The [public notice](#) seeking comment on the applicability of section 4 of the Secure Networks Act to the Commission's rulemaking on protecting against national security threats to the communications supply chain was published in the [Federal Register](#) on May 5, 2020. Comments are due May 20, 2020; replies are due June 4, 2020.
- The International Bureau sent a [letter](#) to China Telecom on May 4, 2020, directing it to file by May 11, 2020, any requests for clarification of the [order](#) directing it to explain why the Commission should not start the process of revoking its domestic and international section 214 authorizations enabling them to operate in the United States. CTA had filed a [motion](#) for an extension to respond to the order, claiming some of the information in the order was unclear, and it would need to seek clarification from the Commission.
- China Telecom filed a [letter](#) on May 1, 2020, to ask the Commission to disclose to CTA any Foreign Intelligence Surveillance Act-related information related to CTA, so that it may respond to the [order to show cause](#).
- The Wireline Competition Bureau issued a [public notice](#) on May 8, 2020, granting a [214 application](#) by Onvoy and Garden Valley Telephone that requested approval for the transfer of certain assets of Onvoy to Garden Valley.

- To date, no comments were filed on 8x8's [application](#) for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. [public notice](#)
- The Consumer and Governmental Affairs Bureau issued [two orders](#) on May 4, 2020, addressing slamming complaints against Central Telecom Long Distance. The Bureau found Central's actions did not result in an unauthorized change in complainants' telecommunications service provider and denied the complaints.

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Upcoming Filing Dates

- May 13 - Replies due on an emergency [request](#) filed by the PR-USVI Fund Coalition, seeking a waiver of rules regarding the bank commitment letter and letter of credit requirements for applicants participating in the Stage 2 fixed competitive process of the Uniendo a Puerto Rico Fund and the Connect USVI Fund. [public notice](#)
- May 15 - Comments due on the [FNPRM](#) on additional measures to combat illegal spoofing, including further implementation of the TRACED Act. Replies are due May 29, 2020.
- May 15 - PRA comments due on an extension of a currently approved information collection relating to payphone compensation. [notice](#)
- May 18 - Comments due on proposed revisions to the annual and quarterly telecommunications reporting worksheets (FCC Forms 499-A and 499-Q), and accompanying instructions, to be used in 2021 to report 2020 revenues. [public notice](#)
- May 18 - Oppositions due to petitions for reconsideration of the RDOF [report and order](#) filed by the [Vermont Department of Public Service](#), the [Illinois Office of Broadband](#), and [Premier Communications](#) are due. Replies are due May 26, 2020. [public notice](#) | [FR](#)
- May 19 - PRA comments due on an extension of a currently approved information collection associated with certain Part 54 ETC designation requirements. [FR](#)
- May 19 - PRA comments due on an extension of a currently approved information collection associated with supply chains. [FR](#)
- May 19 - PRA comments due on an extension of a currently approved information collection associated with price cap pricing flexibility. [FR](#)
- May 20 - Comments due on the applicability of section 4 of the Secure Networks Act to the Commission's rulemaking on protecting against national security threats to the communications supply. Replies are due June 4, 2020. [public notice](#) [FR](#)
- May 20 - PRA comments due on a revision of a currently approved information collection on FCC Form 183, the application to participate in the Rural Digital Opportunity Fund auction. [notice](#)
- May 20 - Replies due on a [petition](#) seeking a study area waiver on the transfer of the Browning, Montana exchange from 3 Rivers to SiyCom, and on SiyCom's [petition](#) seeking ETC designation in the Browning, Montana exchange. [public notice](#)
- May 20 - Replies due on refreshing the record in the Restoring Internet Freedom and Lifeline proceedings. The Bureau seeks comment on how changes adopted in the RIF [order](#) might affect: public safety; the regulation of pole attachments in states subject to federal regulation; and the Lifeline program. [public notice](#), [order](#)

- May 22 - Deadline for ETCs to report on the extent to which their networks contain or use potentially prohibited equipment or services provided by Huawei or ZTE and the costs associated with removing such equipment and replacing it with equivalent equipment. [public notice](#), [order](#)
- May 26 - Replies due to oppositions to petitions for reconsideration of the RDOF [report and order](#) filed by the [Vermont Department of Public Service](#), the [Illinois Office of Broadband](#), and [Premier Communications](#). [public notice](#) | [FR](#)
- May 28 - Replies due on the state of competition in the communications marketplace for its second communications marketplace report. [public notice](#), [public notice](#)
- May 29 - Replies due on the [FNPRM](#) on additional measures to combat illegal spoofing, including further implementation of the TRACED Act.
- May 29 - PRA comments due on a new information collection associated with the [report and order](#) that created a comprehensive database to enable callers to verify whether a telephone number has been disconnected before calling that number. [notice](#)
- May 29 - PRA comments due on a revision to a currently approved information collection associated with FCC Forms 481, 497, 555, 5629, 5630 and 5631, as a result of the November 2019 Lifeline [order](#). [notice](#)
- June 2 - PRA comments due on extension of a currently approved collection on the FCC's Electronic Tariff Filing System. [notice](#)
- June 2 - PRA comments due on a revision of a currently approved collection on FCC Form 683, application for CAF Phase II and RDOF auction support. [notice](#)
- June 4 - Replies due on the applicability of section 4 of the Secure Networks Act to the Commission's rulemaking on protecting against national security threats to the communications supply chain. [public notice](#) [FR](#)
- June 5 - Comments due on letters of intent on traceback consortium. [public notice](#)
- June 8 - PRA comments due on an extension of a currently approved information collection on FCC Form 5625, which is used for the CAF Phase II auction in New York. [notice](#)
- June 8 - PRA comments due on a revision of a currently approved information collection on tariff review plans. ILECs file TRPs to support revisions to the rates in their interstate access service tariffs. [notice](#)

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