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### May 14, 2018 HIGHLIGHTS

- The Restoring Internet Freedom [Order](#) and amendments to the transparency rules [are effective](#) June 11, 2018.
- The Wireline Competition Bureau [announced](#) the availability of illustrative [model results](#) and [summary reports](#) based on that model to aid parties that are preparing comments in response to the 2018 Rate-of-Return USF Reform [NPRM](#).
- The FCC [approved](#), subject to an OpEx cap condition, Hargray Communications and W. Mansfield Jennings' application for the transfer of control of ComSouth from Mansfield to Hargray.
- Chairman Pai sent a [letter](#) to Reps. Ben Ray Lujan (D- N.M.), Frank Pallone (D- N.J.), and Greg Walden (R-Ore.) in response to their [letter](#) on the impact of the FCC's 2016 OpEx limitations on closing the digital divide on Tribal land.
- Hamilton County Telephone filed a [Petition for Reconsideration](#) of the March 23, 2018 RoR USF Reform Order, seeking an increase in the amount of additional A-CAM support.
- CoBank [discussed](#) the need to reform the USF contributions methodology to reflect the broadband consumers who are benefiting from the network that is supported by USF.
- The April 17, 2018 [Second Rural Call Completion Order is effective](#) June 11, 2018, except for the rule contained in 64.2113, which requires OMB approval.
- Comments [are due](#) June 7, 2018, on USTelecom's [Petition for Forbearance](#) from certain ILEC regulatory obligations. Replies are due June 22, 2018. INCOMPAS filed a [Motion to Dismiss](#) USTelecom's [Petition](#).
- Reps. Frank Pallone (D-N.J.) and Mike Doyle (D-Pa.) [asked](#) the FCC to provide information about how FCC broadband deployment data is being used.
- The FCC released the following items from its May 10, 2018 [Open Meeting](#): an [NPRM](#) on the use of 2.5 GHz spectrum; an [NPRM](#) proposing to streamline the rules relating to interference caused by FM translators and expedite the translator complaint resolution process; an [NPRM](#) on streamlining or eliminating certain rules that require the physical posting of broadcast licenses in specific locations; and an [Order](#) that fined Adrian Abramovich \$120 million for malicious call spoofing.
- OMB has approved, for a period of three years, the information collection associated with the FCC's [Part 51 service discontinuance notice rules](#), the [Part 63 service discontinuance rules](#) and the [pole attachment complaint rules](#) contained in the November 29, 2017 [Report and Order](#).
- Oppositions and comments were filed by [AT&T](#), [Sprint](#) and [Intelliquest](#) to Aureon's [Direct Case](#) in the proceeding [investigating](#) the lawfulness of its tariff revisions that were filed on February 22, 2018. Rebuttal due May 17, 2018.

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### Other Key Upcoming Dates

- May 25 - Comments due on the [NPRM](#) on high-cost rate-of-return USF reform. Replies due June 25, 2018.
- June 4 - Comments due on the [Third FNPRM](#) on rural call completion. Replies are due June 19, 2018.
- June 7 - Comments due on the [FNPRM](#) on robocalls. Replies are due July 9, 2018. [FR](#)

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

## USF Reform

- The Wireline Competition Bureau issued a [Public Notice](#) on May 11, 2018, announcing the availability of illustrative model results and summary reports based on that model to aid parties that are preparing comments in response to the 2018 Rate-of-Return USF Reform [NPRM](#). The [first reports](#) (Reports 12 and 13) set forth revised offers of support and obligations for the proposed new model offer. The [second report](#) (80 Percent Minimum Report) is intended to aid parties in commenting on the FCC's proposal to establish a minimum amount of support for carriers receiving legacy rate-of-return support that would not be subject to the budget constraint mechanism.
- The FCC issued a [Memorandum Opinion and Order](#) on May 11, 2018, approving, subject to a condition, Hargray Communications and W. Mansfield Jennings' application for the transfer of control of ComSouth from Mansfield to Hargray. The Order stipulates because ComSouth receives A-CAM support and Hargray receives legacy cost-based USF support, the combined operating expense for Hargray's two existing rate-of-return subsidiaries shall be capped at the averaged combined OpEx of the three calendar years preceding the transaction closing date for which the OpEx data are available to help ensure the combined entity does not receive additional or inflated USF support merely because of cost accounting that shifts costs from ComSouth to Hargray. The cap will apply to cost recovery under both HCLS and CAF-BLS, and will remain in effect for seven years. To monitor compliance with the condition, to the extent it does not already do so, Hargray is directed to submit its relevant cost data to NECA, and NECA is directed to provide USAC with the dollar amount of the operating expense costs that will be capped by this Order.
- Chairman Pai sent a [letter](#) to Reps. Ben Ray Lujan (D- N.M.), Frank Pallone (D- N.J.), and Greg Walden (R-Ore.) on April 24, 2018, in response to their [letter](#) on the impact of the FCC's 2016 OpEx limitations on closing the digital divide on Tribal lands. Pai said on April 4, 2018, the Commission adopted an Order allowing certain rate-of-return carriers serving Tribal communities to recover higher levels of operational expenses from the USF, claiming this action will provide additional funding to these carriers to provide both voice and broadband services to their customers.
- Hamilton County Telephone Co-op filed a [Petition for Reconsideration](#) on May 8, 2018, of the March 23, 2018 Report and Order that provided additional A-CAM support. Hamilton County seeks an increase in the amount of additional A-CAM support to provide funding for the locations that were precluded from receiving support due to a competitor erroneously reporting wider broadband coverage than reality on its Form 477, which Hamilton claimed has since been updated to more closely reflect reality. It also requested the Commission at least seek comment on including these abandoned locations in the USF NPRM.
- CoBank [met with](#) Chairman Pai's Advisor on May 2, 2018, to express appreciation for Chairman Pai's May 1, 2018 [statement](#) recognizing the uncertainty that exists for small, rural carriers to make long term investments to bring highspeed broadband to millions of Americans who still lack it. CoBank discussed the need to reform the USF contributions methodology to reflect the broadband consumers who are benefiting from the network that is supported by USF. It also provided CoBank's 2017 [Annual Report](#) and [Corporate Social Responsibility Report](#) for further background information.
- Mescalero Apache Telecom and Alexicon [met with](#) Wireline Competition Bureau staff on May 2, 2018, to express concern regarding the condition in the [Tribal Opex Order](#) limiting relief from the operations expense limitation rule to those carriers who have not deployed broadband service to 90 percent or more of housing units served. MATI asserted this condition was adopted without sufficient explanation as to why such a condition is necessary, without record support for such a condition, and with no notice the Commission was contemplating such an action. MATI also claimed it does not actually serve 90 percent of customers with 10/1 Mbps broadband service, and there is Commission precedent allowing carriers to demonstrate that actual service differs from Form 477 data if doing so is necessary to avoid the loss of USF revenues based on inaccurate estimates in Form 477 data. MATI argued it should be permitted to do the same, and should receive the relief adopted in the Tribal OpEx Order.

- Members of the National Tribal Telecommunications Association [met with](#) staff from the Office of Native Affairs and Policy and Consumer Protection Bureau on May 7, 2018, to discuss the Universal Service Fund, operational expense relief, and Tribal sovereignty.
- Allband Communications Cooperative, Public Law Resource Center, and JSI [met with](#) Advisors to Chairman Pai and Commissioners O'Reilly and Rosenworcel, and staff from the Wireline Competition Bureau and Office of General Counsel on May 7 and 8, 2018, to discuss Allband's Application for Review of the Bureau's 2018 Allband Waiver Order, which granted in part and denied in part Allband's Petition for Waiver of the per line support cap rule. Allband claimed the 2018 Allband Waiver Order arbitrarily and unreasonably failed to reimburse Allband for a proper and reasonable additional per-line amount, for the period July 20, 2016 through July 31, 2017. They requested some reconsideration and additional recoupment of the per-line support for that period be granted to enable Allband to maintain and expand service to its customers and to assist in Allband's efforts to restructure its federal RUS loan.
- The Rural Broadband Auctions Task Force issued a [Public Notice](#) on May 7, 2018, announcing an upcoming presentation on May 18, 2018, in South Charleston, WV, on the process for challenging the identification of areas initially deemed ineligible for funding through the Mobility Fund Phase II reverse auction. It noted the FCC [released a map](#) on February 27, 2018, showing areas initially deemed eligible to receive support for the provision of 4G LTE service, and also released a map showing the initially ineligible areas where only one provider has reported qualifying service.
- Replies were filed May 7, 2018, to oppositions to the Rural Wireless Association's [Application for Review](#) of the Mobility Fund II Challenge Process Order. [AT&T](#) agreed with Verizon that the Commission should deny RWA's request to switch from a kilometer to a mile grid area for MF II challenges, but supported RWA's recent ex parte that AT&T said now appears to ask the Commission to increase the buffer radius for speed test measurements from 400 to 500 meters. The [Competitive Carriers Association](#) supported RWA's request, saying the FCC's current challenge process procedures leave significant rural areas of the country impossible to challenge, creating an even larger digital divide than exists today. [US Cellular](#) also supported RWA's request, saying RWA's Application correctly pointed out that in many rural areas the Commission's one square kilometer grid size and buffer radius greatly limit a challenger's ability to perform enough tests to mount a successful challenge. [Public Notice](#)
- Alaska Communications Systems [met with](#) advisors to Chairman Pai and Commissioners O'Reilly and Carr and Wireline Competition Bureau staff on May 3 and 7, 2018, to discuss GCI's challenge to the locations it filed as eligible for CAF Phase II support. ACS claimed GCI failed to provide reliable documentation of locations it actually serves, failed to document that GCI is an unsubsidized competitor in any of these locations, and there are inconsistencies between GCI's Form 477 coverage data and the maps it filed in its March 22, 2018 challenge. ACS urged the Commission to deny GCI's challenge and permit CAF Phase II support to be used in the locations proposed.
- SpaceX filed [a letter](#) on May 8, 2018, to notify the FCC that it has opted not to participate in the CAF Phase II auction. It said it believes it is more effective to leverage advanced technology and smart private sector infrastructure investment to reach America's unserved and underserved population, rather than seek government subsidization for this effort.

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## Open Internet

- The FCC published a [Notice](#) in the Federal Register on May 10, 2018, announcing the Office of Management and Budget approved the information collection associated with the Restoring Internet Freedom [Order's](#) transparency rules. The Order and amendments to sections 1.49, 8.1, 8.2, 8.3, 8.5, 8.7, 8.9, 8.11, 8.12, 8.13, 8.14, 8.15, 8.16, 8.17, 8.18, 8.19, and 20.3 are effective June 11, 2018. Chairman [Pai](#) and [Commissioner](#) Rosenworcel issued statements.

- The Wireline Competition Bureau issued a [Public Notice](#) on May 11, 2018, to announce the Restoring Internet Freedom [Order](#), including the refinements to the transparency rule, the reclassification of broadband internet access service as an information service, the reinstatement of the private mobile service classification of mobile broadband internet access service, and the elimination of the conduct rules imposed by the Title II Order, will become effective on June 11, 2018.
- Chairman Pai [responded](#) to a letter from 107 Members of Congress, which expressed support for the Commission's plan to restore internet freedom by reversing the prior Commission's decision to regulate broadband internet service under Title II. Pai said returning to the legal framework that governed the internet from 1996 until 2015 will not destroy the internet, and returning to the light-touch legal Title I framework will help consumers and promote competition. Pai also responded to other Congressional members on various open internet issues, including: Sen. [Maria Cantwell \(D-Wash.\) and Rep. Suzan DelBene \(D-Wash.\)\(response\)](#), Rep. [Vicente Gonzalez \(D-Texas\)\(response\)](#), Sens. [Benjamin Cardin et al. \(D-Md.\)\(response\)](#), [Rep. Robert Pittenger \(R-N.C.\)\(response\)](#), and [Sens. Bill Nelson, et al. \(D-Fla.\)\(response\)](#).
- Sen. Edward J. Markey (D-Mass.) [announced](#) on May 9, 2018, that Senate Democrats filed a Discharge Petition to force a vote on the Congressional Review Act [resolution](#) to disapprove the new rules in the Restoring Internet Freedom [Order](#). The deadline for a Senate vote on the CRA is June 12, 2018. The petition is not yet available.
- The Information Technology and Innovation Foundation released a [report](#) on May 7, 2018, that offers a bipartisan net neutrality legislation proposal. ITIF suggested legislation should: clarify that broadband internet access service is not a "telecommunications service" under Title II; put widely agreed upon Open Internet protections, including no-blocking, no-throttling, and transparency requirements, on firm legal ground; allow pro-competitive traffic differentiation for applications that require it, while preventing anticompetitive abuses of prioritization; give the FCC reasonable, but bounded, jurisdiction to enforce Open Internet rules; and work to bridge the digital divide by funding digital-literacy and broadband-adoption programs, as well as rural broadband infrastructure. [press release](#)

## Broadband

- The FCC issued a [Public Notice](#) on May 8, 2018, announcing comments or oppositions to USTelecom's [Petition for Forbearance](#) are due June 7, 2018. USTelecom seeks forbearance from application of statutory provisions and regulations that it characterizes as falling into one of the following three categories: incumbent LEC-specific unbundling and resale mandates in section 251(c)(3) and (4) and associated obligations under sections 251 and 252; section 272(e)(l)'s RBOC-specific time interval requirements for nondiscriminatory treatment of affiliates and non-affiliates regarding requests for service, and the long-distance separate affiliate requirement for independent ILECs set out in section 64.1903 of the Commission's rules; and section 271(c)(2)(B)(iii)'s RBOC-specific competitive checklist items regarding access to poles, ducts, conduit, and rights-of-way. Replies are due June 22, 2018.
- INCOMPAS filed a [Motion to Dismiss](#) USTelecom's [Petition](#) for Forbearance from certain regulatory obligations placed on ILECs on May 11, 2018. INCOMPAS claimed the 2009 [Forbearance Procedures Order](#) makes clear that a "petition for forbearance must include in the petition the acts, information, data, and arguments on which the petitioner intends to rely." INCOMPAS claimed USTelecom's Petition relies on confidential data and purported interviews not attached to the Petition, and deprives interested parties of their ability to examine all of this underlying data and analysis on which the Petition relies. [Press release](#)
- The FCC issued a [Public Notice](#) on May 11, 2018, announcing Chairman Pai has selected Paul D'Ari to serve as Designated Federal Officer on the Broadband Deployment Advisory Committee, effective May 14, 2018. Mr. D'Ari, who currently serves as Deputy DFO, will replace Brian Hurley, who is leaving the agency. Deborah Salons and Jiaming Shang will serve as the new Deputy DFOs.

- Reps. Frank Pallone (D-N.J.) and Mike Doyle (D-Pa.) sent a [letter](#) to Chairman Pai on May 8, 2018, to express concern with FCC broadband deployment data. They asked Pai to provide information about how these data are being used and on whether the Commission relied on what they claimed are erroneous facts gleaned from faulty Form 477 data to support its reasoning in the Restoring Internet Freedom proceeding, and if so, how did the Commission confirm the accuracy of the data. They also said if the Commission did not use Form 477 data to make its final determination in that proceeding, on which data was the decision based. They asked Pai to respond by May 29, 2018.
- The FCC issued a [Notice](#) in the Federal Register on May 14, 2018, announcing the Office of Management and Budget has approved, for a period of three years, the information collection associated with the Commission's Part 51 service discontinuance notice rules contained in the November 29, 2017 [Report and Order](#). That Order made changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. The amendments to sections 51.325 (Public notice requirement), 51.329 (Methods for providing notice), 51.332 [Deleted], and 51.333 (Short term notice, objections thereto and objections to copper retirement notices) are effective on May 14, 2018.
- The FCC issued a [Notice](#) in the Federal Register on May 9, 2018, announcing the Office of Management and Budget has approved, for a period of three years, the information collection associated with the Commission's service discontinuance rules contained in the November 29, 2017 [Report and Order](#). That Order made changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. The amendments to sections 63.60(d)–(i) (Definitions) and 63.71(k) (Procedures for discontinuance, reduction or impairment of service by domestic carriers) are effective on May 9, 2018.
- The FCC issued a [Notice](#) in the Federal Register on May 10, 2018, announcing the Office of Management and Budget has approved, for a period of three years, the information collection associated with the FCC's pole attachment complaint rules contained in the November 29, 2017 [Report and Order](#). That Order made changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. The amendment to section 1.1424 (Complaints by incumbent local exchange carriers) is effective on May 10, 2018.
- The House Appropriations Committee [unveiled](#) on May 8, 2018, the fiscal year [2019 Agriculture Appropriations bill](#), which will be considered in subcommittee on May 9, 2018. Total discretionary funding in the legislation is \$23.27 billion, including \$620 million for expanding rural broadband and erasing the rural digital divide. The House Appropriations Committee also [unveiled](#) the FY 2019 Commerce, Justice, Science [Appropriations bill](#), which contains \$39.5 million for the National Telecommunications and Information Administration, among other things.
- The National Rural Electric Cooperative Association [met with](#) Wireline Competition Bureau staff to discuss the November 2017 [FNPRM](#) on further changes to the network change disclosure and section 214(a) discontinuance processes. NRECA asserted mobile service is not a substitute for wireline voice services for cooperatives and other anchor institutions in rural communities, and argued forbearance is not a valid legal basis to guide the technology transition of legacy wireline voice services. NRECA claimed some ILECs decline to deploy high capacity IP facilities, forcing cooperatives to deploy their own fiber to establish essential high capacity communications between electric substations. NRECA also stated replacement wireline VoIP service for business customers should, at a minimum, provide 99.99 percent reliability, 100 ms or lower latency, and provide the same geographic coverage as the legacy wireline voice services.

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## Call Completion

- The FCC [published](#) the April 17, 2018 [Second Rural Call Completion Order](#) in the Federal Register on May 10, 2018. The Order adopted a new rule requiring covered providers, i.e., entities that select the

initial long-distance route for a large number of lines, to monitor the performance of the intermediate providers to which they hand off calls. The Order also eliminated the call completion reporting requirement for covered providers that was established by the Commission in 2013. The new rules are effective June 11, 2018, except for the rule contained in 64.2113, which requires OMB approval.

## ICC

- Oppositions were filed on May 10, 2018, to Aureon's [Direct Case](#) in the proceeding [investigating](#) the lawfulness of its tariff revisions that were filed on February 22, 2018. [AT&T \(attachment\)](#) asserted the Commission should find Aureon's current rate to be unreasonable and direct Aureon to file a new rate correcting the errors and refund the difference between that corrected rate and its current rate of \$0.00576/min. [Sprint](#) said the FCC should reject Aureon's proposed tariff or require Aureon to revise the tariff rates to comply with the FCC's applicable benchmarking and parity rules. Sprint requested the FCC require Aureon to provide the data that would be necessary to correct the average mileage for its rates; or alternatively, the FCC should adopt a rate based on the average mileage given that Aureon failed to provide the required data for the mileage calculation. [Intelliquest](#) asserted large volumes of traffic are handed off by intermediate providers, such as Inteliquent, to Aureon for termination by Aureon to the subtending LECs serving call stimulation operations. Inteliquent said based on its current projections derived from recent traffic flows, Inteliquent could be delivering up to 250 million minutes per month to Aureon in the coming months. Rebuttal due May 17, 2018.
- South Dakota Network filed a [Petition for Waiver](#) on May 4, 2018, of section 69.3(f)(1), which requires SDN to file its biennial access tariff filing with an effective date of July 1, 2018. SDN said in light of the Aureon tariff [investigation](#), it seeks permission to file its biennial access tariff on September 17, 2018, with an effective date of October 2, 2018. SDN said although its tariff filing is not the subject of the Order, the resolution of the issues raised therein may impact SDN's upcoming tariff filing and its tariffed rate.
- The Minnesota Independent Equal Access Corporation filed a [Petition for Waiver](#) on May 9, 2018, of section 69.3(f)(1), which requires MIEAC to submit an access tariff filing with an effective date of July 1, 2018. MIEAC said the uncertainty regarding the lawfulness of Aureon's tariff means that, upon resolution of the [investigation](#) by the Commission, MIEAC may need to make revisions to its access tariff not long after the current July 1 deadline. MIEAC seeks a waiver until October 2, 2018.

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## Universal Service

- The Wireline Competition Bureau released an [Order](#) on May 7, 2018, denying 14 requests for review of USAC decisions concerning duplicative support from the Lifeline program. The Bureau said USAC took reasonable action, consistent with Bureau guidance, in implementing the Commission's rules and policies concerning the detection of duplicative Lifeline support in its duplicates check process.
- The National Lifeline Association [met with](#) Wireline Competition Bureau staff in May 2, 2018, to discuss the recent and proposed changes to the Lifeline program. It said the proposal to require wireless resellers to pass-through to their underlying carrier the full amount of the \$9.25 subsidy would eliminate wireless resellers from the program. It also said support for voice services should be restored everywhere, not just rural America.
- The Telecommunications Association of Michigan filed a [letter](#) on May 7, 2018, to express support for the Michigan PSC's [request](#) for an additional extension to Michigan's current Lifeline waiver for another six months, until December 31, 2018. TAM agreed with the MPSC that inconsistencies in the eligibility criteria will lead to substantial customer confusion, increase the administrative burden for Lifeline providers and the state level administrators of Lifeline Programs, and cause the potential for administrative mistakes and delays in providing Lifeline services to customers.

- OEConnect filed a [Petition](#) on May 9, 2018, seeking ETC designation in New York in all areas in which its parent company, Otsego Electric Cooperative, has been awarded CAF Phase II support via the New NY Broadband Program. OEConnect said as a result of the award, it is obligated to seek ETC designation status within 180 days of the award.
- Chairman Pai sent a [letter](#) to ACS on May 8, 2018, to remind it that under the Communications Act and Commission rules, it must continue to provide service to the rural healthcare providers it serves upon a bona fide request for service, even if ACS does not choose to bid for a rural healthcare provider's business. Pai also said ACS must not charge rural healthcare providers a rate higher than the urban rate, and is prohibited from engaging in unjust and unreasonable practices or from discontinuing service to a community without prior Commission approval.
- The [Tennessee Primary Care Association](#), [Yakima Neighborhood Health Services](#), [Horizon Health Care](#), [Canyonlands Healthcare](#), [Valle del Sol](#), the [California Primary Care Association](#), [Canby Family Practice Clinic](#), [El Rio Health Center](#), the [Virginia Community Healthcare Association](#), [Mountain Valleys Health Centers](#), [Akutan](#), [Tri-Area Community Health](#), and [Sitka Counseling](#) filed letters to express support for SHLB Coalition's [Petition](#) for a waiver of the Rural Health Care funding cap for Funding Year 2017.

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## State Actions

- NY State Senator Rob Ort [requested](#) a formal investigation into the state's broadband program, the New York "Broadband for All" Program, which he asserts has not achieved its goal to deliver high-speed internet to all New Yorkers. He also introduced [legislation](#) that would require yearly financial reports from the New York State Broadband Program Office, documenting how any new funding for the program is spent.

## Misc.

- The FCC released the following items from its May 10, 2018 [Open Meeting](#): an [NPRM](#) proposing to allow more efficient use of 2.5 GHz spectrum by increasing flexibility for existing Educational Broadband Service licensees and providing new opportunities for educational entities, rural Tribal Nations, and commercial entities to access unused portions of the band; an [NPRM](#) proposing to streamline the rules relating to interference caused by FM translators and expedite the translator complaint resolution process; an [NPRM](#) on whether to streamline or eliminate certain rules which require the physical posting and maintenance of broadcast licenses and related information in specific locations; and an [enforcement action](#) that fined Adrian Abramovich \$120 million for malicious call spoofing that was part of his massive robocalling operation.
- The FCC [deleted](#) the Hearing Designation Order item from the May 10, 2018 Open Meeting [agenda](#). The FCC said the Order has been released.
- No replies were filed on NECA's [2017 Interim Modification of Average Schedules and 2018 Further Modification of Average Schedules](#), filed on February 26, 2018. [Public Notice](#)
- Verizon [met with](#) Chairman Pai's Advisor and staff from the Office of Strategic Planning and Policy Analysis and Consumer and Governmental Affairs Bureau on May 3, 2018, to discuss robocalls. Verizon said it is committed to deploying the STIR/SHAKEN authentication standard in its networks, and expressed support for the Commission's clarification that carriers are permitted to block calls that are from unassigned, unallocated, or invalid numbers, and where the subscriber assigned a number authorizes the blocking. Verizon also expressed support for requests to provide service providers with additional blocking flexibility, provided the Commission's policy takes into account the risks of unintended consumer harms potentially associated with widespread blocking.

- Securus Technologies filed [a letter](#) on May 7, 2018, to discuss robocalls, and to express concern over erroneously blocked calls placed by inmates of correctional facilities. It said the INCOMPAS proposal presents a flexible approach to ensuring that consumers and other service providers, such as Securus, would be able to submit a request to resolve erroneous call blocking issues. It urged the Commission to obligate voice service providers who voluntarily block calls to immediately unblock a telephone number upon receipt of a facially valid challenge from an end user to whom that number has been assigned, a telecommunications carrier or interconnected VoIP provider to which that number has been allocated by NANPA, or a reseller of such a carrier's or provider's services.
- Prof. Henning Schulzrinne, Columbia University Computer Science, [met with](#) staff from the Office of Strategic Planning and Policy Analysis on May 8, 2018, to discuss the recent conclusion of the NANC CATA working group and his submission as a minority report to the working group (attached). He asserted economic incentives and historical precedents for other internet security technologies make it unlikely that STIR/SHAKEN calling number authentication will be deployed at sufficient scale without a firm deadline and mandate. He noted his submission to the CATA working group recommended a Commission-enforced deadline of one year for carriers using VoIP.
- The FCC issued a [Small Entity Compliance Guide](#) on May 8, 2018, on the September 5, 2017 [Report and Order](#) that established a schedule of regulatory fees to collect \$356,710,992 for FY 2017. The guide provided information on annual regulatory fees for: Wireless Radio Services (§ 1.1152); Mass Media Services (§ 1.1153); Cable Television Services (§ 1.1155); Common Carrier Services (§ 1.1154); and International Services (§ 1.1156).
- The FCC issued a [Public Notice](#) on May 11, 2018, announcing the U.S. Department of Justice is investigating the proposed merger of T-Mobile and Sprint and has requested access to information contained in each Numbering Resource Utilization and Forecast report filed with the FCC by wireless telecommunications carriers from December 2017 through the present, by carrier and by rate center. The DoJ also requested LNP data related to wireless telecommunications carriers, by carrier and by rate center, from October 2017 to the present. Parties have until May 21, 2018, to oppose disclosure of NRUF and LNP data to the DoJ. If the Commission receives no opposition, it will disclose the information to the DoJ.
- No comments were filed on Apeiron Systems' application for authorization to obtain NANP telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)

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## Upcoming Filing Dates

- May 14 - PRA comments due on the revisions to the currently approved information collection pertaining to the payphone compensation rules. [Notice](#)
- May 14 - Replies due on the Oglala Sioux Tribe's [Petition](#) for reconsideration of the Order that granted, in part, its request for a temporary waiver of Lifeline recertification rules. [Public Notice](#)
- May 21 - PRA comments due on a new information collection on the Application for CAF Phase II Auction Support, FCC Form 683 and on a revision of a currently approved collection associated with High Cost USF support forms. [Notice](#)
- May 21 - Oppositions due to the U.S. Department of Justice's request for NRUF and LNP data in connection with its investigation of the proposed merger of T-Mobile and Sprint. [Public Notice](#)
- May 25 - Comments due on the NPRM portion of the March 23, 2018, [Report and Order, Third Order on Reconsideration, and NPRM](#) on high-cost USF rate-of-return reform. Reply comments are due June 25, 2018. [FR](#)



- May 29 - PRA comments due on revisions to Lifeline and ETC Forms 555, 481, 497, 5629, 5630 and 5631. The revisions implement the requirement that ETCs provide written notice to their customers who are currently receiving enhanced support but will no longer be eligible for enhanced Tribal support. [Notice](#)
- May 29 - CAF Phase I Round 2 challenges due on previously unidentified census blocks served by FairPoint. [Public Notice](#)
- June 1 - Comments due the [NPRM](#) proposing ways to ensure that USF support is not used to purchase equipment or services from companies posing a national security threat to the integrity of communications networks or the communications supply chain. Replies are due July 2, 2018. [FR](#)
- June 4 - Comments due on the [Third FNPRM](#) on rural call completion. The FCC seeks comment on: proposed rules to implement the recently enacted Improving Rural Call Quality and Reliability Act of 2017, and sunsetting the recording and retention rules established in the RCC Order upon implementation of the RCC Act. Replies are due June 19, 2018.
- June 7 - Comments due on the [FNPRM](#) on ways to address the problem of unwanted calls to reassigned numbers. Replies due July 9, 2018. [FR](#)
- June 7 - Comments due on USTelecom's [Petition for Forbearance](#) from certain ILEC regulatory obligations. Replies are due June 22, 2018. [Public Notice](#)
- June 19 - Replies due on the [Third FNPRM](#) on rural call completion. The FCC seeks comment on: proposed rules to implement the recently enacted Improving Rural Call Quality and Reliability Act of 2017, and sunsetting the recording and retention rules established in the RCC Order upon implementation of the RCC Act.
- June 22 - Replies due on USTelecom's [Petition for Forbearance](#) from certain ILEC regulatory obligations. [Public Notice](#)
- June 25 - Petitions due seeking to suspend or reject tariff filings made on 15 days' notice. Replies due June 28, 2018. [Order](#)
- June 25 - Replies due on the NPRM portion of the March 23, 2018, [Report and Order, Third Order on Reconsideration, and NPRM](#) on high-cost USF rate-of-return reform. [FR](#)
- July 2- Replies due the [NPRM](#) proposing ways to ensure that USF support is not used to purchase equipment or services from companies posing a national security threat to the integrity of communications networks or the communications supply chain. [FR](#)
- July 9 - Replies due on the [FNPRM](#) on ways to address the problem of unwanted calls to reassigned numbers. [FR](#)

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