

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

May 16, 2016 HIGHLIGHTS

- NECA filed [comments](#) on the FNPRM attached to the Rate-of-Return [USF Reform Order](#). [List of all other comments available](#). Replies are due June 13.
- The FCC is [circulating](#) an Order addressing Petitions for Waiver of section 51.917 regarding 2011 Base Periods ICC Revenues.
- NTCA [discussed](#) the “competitive challenge” filings recently made in connection with potential A-CAM offers and elections, suggesting the FCC take careful account of all evidence in their possession regarding the offering of qualifying services on a census block-specific basis.
- NTCA [discussed](#) the operation of budget controls under the RoR [USF Reform Order](#), and noted the need for equitable sharing of budget resources and fair application of budget controls among all RLECs. Totah Communications, TDS Telecom, and WTA [discussed](#) concerns with the A-CAM election process and budget controls as described in the RoR [USF Reform Order](#).
- Frontier [discussed](#) its experience in building out under both CAF Phase I and Phase II and discussed its proposal for interim support for voice service in extremely high-cost locations in the territories of price cap carriers that accepted the offers of model-based support.
- ATA [disagreed](#) with ACS that the CETC portion of the Alaska Plan should be disapproved, delayed, or subject to ACS’s proposed conditions. ATA [filed](#) member companies’ proposed performance obligations that would be enabled through the proposed Alaska Infrastructure Fund, and filed revised rules to implement the proposed Alaska Infrastructure Fund. Matanuska Telephone Association, et al. [discussed](#) the performance obligations recently submitted by Alaska’s RLECs related to the proposed Alaska Infrastructure Fund and related pricing benchmarks.
- Sprint and Level 3 [asserted](#) LECs are only entitled to reciprocal compensation in connection with intraMTA calls and may not impose access charges on other carriers carrying such calls.
- NECA filed [reply 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](#). AT&T and SIC also filed replies.
- NECA filed its 2016 [Further Modification](#) of the Average Schedule Universal Service HCLS Formula.
- The Senate Judiciary Committee held a [hearing](#) on the FCC’s NPRM on broadband privacy rules.
- The FCC issued an [Order](#) resolving a call completion investigation involving inContact. [News Release](#).
- Chairman Wheeler sent a [letter](#) to Sen. John Thune (R-S.D.) in response questions on the disclosure of non-public information outside the Commission.

Other Key Upcoming Dates

- 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](#)
- June 13 - Replies due on the [FNPRM](#) attached to the [Rate-of-Return USF Reform Order](#).

USF Reform

- NECA filed [comments](#) on May 12, 2016, on the FNPRM attached to the Rate-of-Return [USF Reform Order](#), which sought comments on: rule changes to the FCC's accounting and affiliate transaction rules for ratemaking and USF support purposes; additional methods for reducing support in competitive areas; increasing support for RoR carriers in Tribal lands and unserved areas; measures to improve the operation of the current RoR system; and streamlining ETC annual reporting requirements. [NECA](#) said there is a need for Commission clarification as to impermissible expenses going forward, and said any changes should apply on a prospective basis and be clear and simple for carriers, NECA, and USAC to administer. NECA also suggested the Commission not implement a general exception to "deemed lawful" status of tariffs for incorrect certifications of company data, but should at most consider implementing an exception applicable only to individual carriers that have been found to have willfully or deliberately misrepresented data to gain financial or other advantages. NECA also said its tariff and pooling processes can be adapted to implement differing SLC charges that may be used to recover costs in areas where support is disaggregated as a result of competitive overlaps.
- Comments were filed on May 12, 2016, on the FNPRM attached to the Rate-of-Return [USF Reform Order](#). [NTCA](#) said the multiple layers of expense caps and the oversight by NECA, USAC, and the Commission already provide substantial incentives for efficient operations, but it agreed greater clarity with respect to recoverable expenses would help carriers as well as NECA and USAC. It said the broad exception proposed to the "deemed lawful" provision in the Communications Act is unjustified, inconsistent with judicial precedent, and would effectively and impermissibly write the "deemed lawful" provision out of the statute. NTCA also said the Commission must permit RLECs the opportunity to assess a tariffed, regulated rate element on consumers to recover costs that are no longer eligible for USF due to the operation of Commission policies or, at the RLEC's option, permit recovery of such costs via a de-tariffed rate. [WTA](#) said any further additions to the Commission's list of impermissible operating expenses should be explicitly included in revised Commission rules and disallowed only prospectively. It also said there is no discernable basis in the statute or judicial interpretation for voiding or otherwise setting aside "deemed lawful" status in cases of errors or mistakes not involving fraud or deliberate deceit, and said although NECA is a tough cop regarding enforcement of Commission rules, WTA supports a continuing role for NECA in tariff administration and as a repository and analyst of data for RLECs and the Commission. [USTelecom](#) expressed concern that the actions of bad actors in the RLEC ecosystem unfairly reflect poorly on all RLECs thereby causing the Commission to unnecessarily consider potentially overly prescriptive rules that would not allow RLECs to make legitimate discretionary business decisions about their operations. It also said the FCC needs to give careful consideration as to the scope and purpose of each ETC reporting obligation as it moves into CAF Phase II, and it supports elimination of reporting requirements listed in the FNPRM as unnecessary, duplicative, or not useful to the FCC for evaluating compliance with high-cost program requirements, particularly CAF Phase II requirements. [Windstream](#) expressed support for the Commission's proposals to eliminate or modify the reporting requirements listed in the FNPRM, and expressed support for the proposal to eliminate ETCs' requirement to file duplicate copies of Form 481 with states and Tribal governments. It said, however, an online tool permitting state and Tribal governments to access Form 481 data should provide appropriate protection for information submitted confidentially. [Link to all comments available](#). Replies are due June 13.
- NTCA filed a [letter](#) on May 11, 2016, discussing the many "competitive challenge" filings recently made in connection with potential A-CAM offers and elections. NTCA said even if there is a desire to treat the Form 477 data as presumptive in finalizing A-CAM model offers, one cannot overlook clear evidence in the record indicating that certain Form 477 data are simply inaccurate or imprecise in measuring the presence of competition. NTCA suggested the FCC take careful account of all evidence in their possession regarding the offering of voice service on a census block-specific basis, and said a number of challenges raise serious evidentiary questions about the validity of the Form 477 data. NTCA also reiterated its concern about the handling of neighboring ILECs in a "shared" census block in generating offers of model-based support.
- NTCA [spoke with](#) the Deputy Chief of the Wireline Competition Bureau on May 10, 2016, to discuss the operation of budget controls under the RoR [USF Reform Order](#). NTCA noted the need for equitable

sharing of budget resources and fair application of budget controls among all RLECs, and asserted that each RLEC should be responsible for any and all consequences arising out of its consideration of a potential election of model support, rather than having the risk and consequences of any one carrier's decision spread across and among other carriers. NTCA attached two suggested alternatives for ensuring equitable management of the budget among all RLECs.

- Totah Communications, TDS Telecom, and WTA [met via telephone](#) with Wireline Competition Bureau staff on May 6, 2016, to discuss Paragraph 69 and Footnote 141 of the RoR USF [Reform Order](#). WTA asked how the second step of the A-CAM election process and related budget modifications would work with respect to carriers that initially selected an A-CAM support offer that was less than the support they received from the legacy mechanisms in 2015, but then subsequently declined to accept a revised A-CAM offer. WTA expressed concern that some options for dealing with this situation would reduce the overall budget for all carriers remaining on the rate-of-return path, and thereby penalize carriers that had not selected, or could not select, the model-based path and had not participated in the actions of those carriers that had opted into, and then out of, the A-CAM support offers.
- Frontier [met separately with](#) Commissioners Pai and Rosenworcel and their Legal Advisors, Legal Advisors to Chairman Wheeler and Commissioner O'Reilly, and Wireline Competition Bureau staff on May 6, 2016, to discuss Frontier's experience in building out under both CAF Phase I and Phase II. Frontier also discussed its proposal for interim support to ensure continuity of voice service to extremely high-cost locations in the territories of price cap carriers that accepted the offers of model-based support.
- The Alaska Telephone Association filed a [letter](#) on May 6, 2016, stating it shares the views expressed by GCI in its May 3, 2016 [letter](#), and, like GCI, ATA disagrees with ACS that the CETC portion of the Alaska Plan should be disapproved, delayed, or subject to ACS's proposed conditions. ATA said like GCI, the other ATA signatories took middle mile costs into account as they prepared their proposed performance commitments, and said several Alaska Plan signatories, like GCI, have made substantial investments to deploy fiber, microwave, and subsea cable middle mile solutions. ATA claimed these investments show both that, with support from federal and state programs, private companies can invest in middle mile facilities even in the most challenging environments and that GCI is not the only provider in Alaska to do so. ATA urged the Commission to adopt the Alaska Plan as proposed.
- The Alaska Telephone Association filed a [letter](#) on May 10, 2016, to submit member companies' proposed performance obligations detailing improvements in both fixed and mobile broadband service that would be enabled through the Alaska Infrastructure Fund. It also submitted revised rules to implement the proposed Alaska Infrastructure Fund.
- Matanuska Telephone Association, Arctic Slope Telephone Association Cooperative, Ketchikan Public Utilities, GCI, and ATA [met telephonically with](#) Wireline Competition Bureau staff on May 12, 2016, to discuss the performance obligations recently submitted by Alaska's RLECs related to the proposed Alaska Infrastructure Fund and related pricing benchmarks. They provided information about pricing and usage that can be provided at various price points, which they said are driven by the cost of middle mile in the particular region of Alaska being served.
- GCI filed a [letter](#) on May 11, 2016, to submit a redacted version of a Modified Alaska Mobile Broadband Cost Model prepared by The Brattle Group. GCI indicated the model estimates the cost of providing 4G LTE service to specific areas within Alaska and estimates the PV of ten years of backhaul costs, based on the type of backhaul currently accessible for the specific geographic areas considered. GCI said the present value of the cost of providing 4G LTE service to all Alaska Plan Census Blocks is estimated to be roughly \$1.511 billion, which exceeds the PV of the Alaska Plan proposed funding.
- ACA [met with](#) Chairman Wheeler's Senior Legal Advisor, Legal Advisors to Commissioners Rosenworcel and O'Reilly, and Wireline Competition Bureau staff on May 11 and 13, 2016, to discuss the proposed Order to develop a framework for the CAF Phase II competitive bidding process. ACA asserted to maximize participation, the Commission should construct an auction process that is

relatively simple and straightforward and provides the certainty that will increase incentives for providers, especially smaller providers, to participate.

- ViaSat [met with](#) Commissioner Clyburn's Legal Advisor on May 11, 2016, to emphasize its support for an objective, competitively-neutral, market-based mechanism that distributes CAF Phase II support to the lowest cost bidder. It also discussed the opportunity and other business costs involved with committing to CAF areas for ten years, and indicated that providing support only to the extent a customer is receiving CAF-supported services at any given time is neither consistent with the business case nor consistent with how the CAF is administered for other providers.
- The Satellite Industry Association filed a [letter](#) on May 12, 2016, to reiterate its support for a CAF Phase II competitive bidding framework that does not favor any one technology over others. It said innovations in the satellite industry, including high-throughput satellites, present important potential solutions for the problems the CAF seeks to address. SIA expressed support for a continued commitment to the longstanding policy of competitive neutrality in the current Order.

[Back to Highlights](#)

ICC

- An Order addressing Petitions for Waiver of section 51.917 regarding 2011 Base Periods ICC Revenues is on [circulation](#) with the Commission as of May 12, 2016.
- Sprint and Level 3 [met with](#) Wireline Competition Bureau staff on May 5, 2016, to assert LECs are only entitled to reciprocal compensation in connection with intraMTA calls and may not impose access charges on other carriers, including IXCs, carrying such calls. They urged the Commission to reiterate its rule in answering the LEC Coalition [Petition](#) for Declaratory Ruling. They said it would serve the interests of all parties for the Commission to reiterate its position soon because hundreds of telecommunications carriers are about to embark on costly discovery in connection with the related district court proceeding.

Call Completion

- The Enforcement Bureau issued an [Order](#) on May 9, 2016, adopting a consent decree to resolve its investigation into whether inContact, a long distance carrier and provider of call center-related services, failed to ensure that the providers it used to deliver its calls to a consumer in rural Minnesota were doing so reliably. The FCC said on at least three occasions in 2014 and 2015, the consumer complained to the FCC about problems receiving work calls and reported lost income as a result of the lost calls. To settle this matter, inContact will implement a compliance plan to prevent recurrence of these violations and will pay a \$100,000 civil penalty. [News Release](#).

Broadband

- The Senate Judiciary Committee held a [hearing](#) on May 11, 2016, entitled *Examining the Proposed FCC Privacy Rules*. Witnesses included Chairman Wheeler, Commissioner Pai, FTC Chairwoman Edith Ramirez, and FTC Commissioner Maureen Ohlhausen. [Chairman Wheeler](#) said the FCC's NPRM does not seek to regulate the edge, and explained the proposal is narrowly focused on the personal information collected by broadband providers as a function of providing broadband connectivity, not the privacy practices of the websites and other online services that consumers choose to visit. [Commissioner Pai](#) said the FCC's approach singles out new upstarts in the concentrated market for online advertising, may actively confuse consumers, and may signal the end for ad-based discounts on online services. He also said given this highly elastic approach, the FCC could easily regulate the privacy practices of edge providers without a vote of Congress.

- CTIA, ACA, et al. sent a [letter](#) to Sens. Jeff Flake (R- AZ) and Al Franken (D- Minn.) on May 10, 2016, on the FCC's recently proposed privacy rules for ISPs. CTIA, et al. asserted the privacy regime proposed by the FCC in the NPRM departs from the FTC framework in significant and material respects, and said the FCC framework would make opt-in the default consent mechanism for virtually all uses of customer data. They claimed this would lead to absurd results, such as restricting an ISP's ability to market accessories that work with a consumer's device. CTIA, et al. attached a proposal that includes privacy principles such as transparency, respect for context, and choice, and claimed adoption of this approach would be less disruptive for the broadband ecosystem.
- Verizon [met with](#) Chairman Wheeler's Chief of Staff and Wireline Competition Bureau and General Counsel staff on May 5, 2016, to discuss the Commission's broadband privacy proceeding. Verizon described its current advertising programs, including the notices it provides to its customers and the choices it makes available concerning their participation in these programs. Verizon said several of the Commission's proposals in this proceeding, including the broad opt-in requirement for the use or sharing of information and restrictions on the use of persistent identifiers, would be inconsistent with both Verizon's current advertising programs and the practices of other Internet companies.
- Public Knowledge [met with](#) Commissioner Rosenworcel's Legal Advisor on May 5, 2016, to express concern with the FCC's proposal to allow certain forms of personal information to be used for marketing additional BIAS offerings without the express consent of the customer. PK asserted this is in direct conflict with section 222(c) of the Communications Act, which requires the approval of the customer before a telecommunications carrier can use the customer's CPNI for anything other than "(A) the telecommunications service from which such information is derived, or (B) services necessary to, or used in, the provision of such telecommunications service, including the publishing of directories."
- Davis, Polk & Wardell and DLA Piper [met with](#) Chairman Wheeler's Chief of Staff and Wireline Competition Bureau staff on May 6, 2016, to discuss the Commission's broadband privacy NPRM. They expressed concerns with the NPRM's broad opt-in requirement for use and sharing of non-sensitive data by broadband providers. They claimed this proposal is inconsistent with other U.S. privacy regulation and would reduce broadband providers' ability to compete in the market for online advertising. They also discussed the data breach notification and audit log provisions, which they believe could be made less burdensome.
- The FCC issued a [Public Notice](#) on May 12, 2016, announcing the agenda for its Connect2Health Task Force conference which will highlight how broadband-enabled health technologies can improve access to mental health care and discuss associated policy issues. The conference will be co-hosted by the University of Houston Law Center's Health Law & Policy Institute.

[Back to Highlights](#)

USF

- The FCC released a [Public Notice](#) on May 9, 2016, announcing that several prohibited written presentations were filed in the Lifeline, Eligible Telecommunications Carriers, and Connect America Fund proceedings during the Sunshine period. The FCC said these filings will be associated with, but not made a part of, the record in the proceedings.
- The FCC published a [Notice](#) in the Federal Register on May 12, 2016, seeking PRA comments on a revision to a currently approved collection associated with FCC Forms 497 (Lifeline and Linkup worksheet), 555 (Annual Lifeline ETC Certification Form), and 481 (Carrier Annual Report Data Collection Form). The FCC said the information collection is being revised to comply with the Commission's new rules, adopted in the Lifeline [Third Reform Order](#), regarding phasing out support for mobile voice over the next six years, requiring ETCs to certify compliance with the new minimum service requirements, creating a new ETC designation for Lifeline Broadband Providers, updating the obligations to advertise Lifeline offerings, modifying the non-usage de-enrollment requirements,

moving to rolling annual subscriber recertification, and streamlining the first-year ETC audit requirements. PRA comments are due July 11.

- The FCC published a [Notice](#) in the Federal Register on May 11, 2016, seeking PRA comments on a revision to a currently approved collection associated with FCC Forms 472 (billed entity applicant reimbursement form), 473 (E-rate service provider annual certification form), and 474 (service provider invoice form). The FCC said the information collection is being revised pursuant to program and rule changes in the E-Rate Modernization [Order](#) that require the collection of information necessary to allow USAC to make direct payments to applicants and add service provider certifications to FCC Form 473. The FCC said the information collection is also being revised to accommodate USAC's new online portal and the E-Rate Modernization Order requirement that the forms in this collection be filed electronically. PRA comments are due June 10.
- Nex-Tech Wireless filed a [Petition](#) on May 9, 2016, seeking an emergency waiver of the FCC's requirement that revisions to FCC Form 499-Q be filed within 45 days after the filing deadline and requesting reversal of any interest and penalties associated with any outstanding amounts while the request is pending. NTW also requested the FCC to direct USAC to accept its revised February 1, 2016 FCC Form 499-Q, and to process it as if it was timely filed. NTW said it made a clerical error on its February 1, 2016 Form 499-Q, which resulted in a large overstatement of its projected interstate revenues for the second quarter of 2016, and only discovered the error when it received the first invoice for that quarter.

[Back to Highlights](#)

Misc.

- NECA filed [reply comments](#) on May 9, 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 based on the facts that existed prior to the Declaratory Ruling and exist today, the cost and the capacity of the Paniolo cable system are far in excess of what is reasonable to serve SIC's regulated broadband customer service requirements from 2010 through the near future. NECA urged the Commission to promptly resolve the open issues in this docket.
- AT&T and Sandwich Isles Communications filed reply comments on May 9, 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](#). AT&T asserted SIC has provided the Commission no basis to justify its continued recovery of 50 percent of the lease costs. SIC asserted the Bureau should issue an order that removes the regulatory obstacles to the refinancing proposal SIC has advanced.
- NECA filed its 2016 [Further Modification](#) of the Average Schedule Universal Service High Cost Loop Support Formula on May 13, 2016, in compliance with the March 30, 2016 Rate-of-Return [USF Reform Order](#). The filing contains proposed modifications to the formula used to calculate interstate high cost loop expense adjustments for average schedule companies for July - December 2016 to implement the revised authorized rate of return in the Order. These modifications are scheduled to take effect on July 1, 2016, instead of the [formula](#) filed by NECA on August 21, 2015, and remain in effect through December 31, 2016.
- Chairman Wheeler sent a [letter](#) to Sen. John Thune (R-S.D.) on May 2, 2016, in response to questions posed in his April 14, 2016 letter regarding disclosure of non-public information outside the Commission. Chairman Wheeler said authorizations to disclose nonpublic information do not have to be written, except in the situation described in paragraph (b) of Commission rule 19.735-203, where an FCC employee would like to use nonpublic information in outside teaching, lecturing, or writing. He said he has not provided such a written authorization since being an FCC Chairman, and said his

office does not keep a list of the disclosures for which written authorization is not required. He also said how and when nonpublic information about the recent Lifeline Order was shared outside of the FCC is now the subject of an investigation by the FCC Inspector General.

- The Wireline Competition Bureau issued a [Public Notice](#) on May 10, 2016, listing Acknowledgements of Confidentiality filed by parties seeking access to confidential information filed in the special access data collection proceeding since the May 4, 2016 Public Notice. Parties that submitted confidential information in response to the collection have until May 17, 2016, to object to the disclosure of their data and information to any of the parties listed in the attachment to this Public Notice.
- NCTA filed a [motion](#) on May 13, 2016, seeking an extension of time to file comments on the Business Data Services [FNPRM](#). NCTA asked the Commission to extend the deadline for comments by at least 45 days and replies by an additional 30 days. NCTA asserted the Commission issued a complicated, voluminous further notice that significantly expands the scope of the proceeding to cover new services, new providers, and new issues, and claimed the pleading cycle adopted fails to reflect the radically expanded scope of the proceeding.
- USTelecom filed a [letter](#) on May 11, 2016, asking the FCC for access to the computer programs that were used to prepare the estimation samples in the FCC-commissioned [white paper](#) (App. B of Order/FNPRM), authored by Dr. Marc Rysman, on the empirics of business data services. USTelecom requested the FCC make available these programs and data and other support as necessary to ensure that parties have adequate notice and sufficient time to review and prepare comments within the established comment period, as soon as possible but not later than May 20, 2016.
- Verizon [met with](#) the FCC's General Counsel and Wireline Competition Bureau Chief on May 11, 2016, to discuss the proposals contained in the FCC's Business Data Services FNPRM and the principles in the Verizon / INCOMPAS [letter](#). It asserted that given the way the marketplace has developed, the FCC should adopt a regulatory framework that ensures a level playing field for all providers that offer the same or similar services.
- INCOMPAS sent a [letter](#) to Chairman Wheeler on May 9, 2016, asking the Commission to include the proposed reforms in the Business Data Services market to any response it makes to the President's [Executive Order](#), which requests executive and independent agencies to identify specific actions they can take to enhance competition. INCOMPAS also encouraged the Commission to include a commitment that it will build on recent actions addressing the interconnection and Internet traffic exchange practices of broadband Internet access service providers.
- Time Warner Cable filed a [letter](#) on May 12, 2016, in response to questions from Commission staff clarifying its methodology for responding to Section II.A.3 of the Commission's 2015 special access data collection. TWC provided information on its dedicated services and areas in which it provides service.
- The FCC published a [Notice](#) in the Federal Register on May 11, 2016, seeking PRA comments on previously approved recordkeeping requirements imposed on ILECs that offer international, interexchange services to maintain books of account separate from such ILEC's local exchange and other activities. The FCC noted the Commission granted, in part, a petition for forbearance from the separate affiliate requirement in May 2013 for ILECs that are subject to price cap regulation and adopted a Second FNPRM to consider modifying or eliminating the separate affiliate requirement for rate-of-return ILECs, and as a result there has been a change to recordkeeping requirements and the Commission's previous burden estimates. Comments are due by June 10.
- The Wireline Competition Bureau issued a [Public Notice](#) on May 12, 2016, seeking comment on AT&T's [application](#) to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. The Bureau said unless otherwise notified by the Commission, AT&T may provide the states in which it intends to request numbers on the 31st day after the date of this notice. Comments are due May 27.

- Verizon [spoke with](#) Legal Advisors to Commissioners Clyburn and Rosenworcel on May 9, 2016, to argue it is critical that the Commission quickly approve the Master Service Agreement between Telcordia and NAPM, asserting the delay continues to cost the industry tens of millions of dollars each month. Verizon also said delay in approval of the Agreement would also mean delay in the additional meaningful planning among all providers that will occur with the transition.
- The Open Technology Institute at New America and the LNP Alliance [met with](#) Commissioner Pai's Legal Advisor on May 10, 2016, to urge the FCC to allow smaller carriers and consumers sufficient time to review the iconectiv LNPA Master Service Agreement before the Commission votes on it. They said they only recently came into possession of the 381-page MSA, which has over 2,500 pages of attachments, and are requesting that they be given until June 15, 2016, to review the document and recommend improvements. They also [met with](#) Commissioner Clyburn's Legal Advisor on May 11, 2016, to discuss similar issues.
- Neustar filed a [letter](#) on May 9, 2016, to respond to iconectiv's [letter](#) disputing Neustar's claims in its May 2, 2016 [ex parte](#) that asked the Commission to require iconectiv to file in the public record certain communications related to its contract negotiations with the NAPM. Neustar asserted communications regarding this issue are not exempt from the Commission's ex parte rules, and claimed industry participants and members of the public have a right to know the circumstances around Ericsson's apparent violations and the basis for determining that it could nevertheless be permitted to serve as LNPA.
- Neustar filed an [opposition](#) to iconectiv's [Motion to Strike](#) Neustar's [reply](#) in support of its [Application for Review](#) of the Wireline Competition Bureau's March 31, 2016 [Second Protective Order](#) in the LNP Administrator transition docket. Neustar claimed the five-page limit for replies set forth in section 1.115 applies to applications for review of a hearing designation order, which this is not. Neustar also asserted even if iconectiv's reading of the rule were correct, no purpose would be served by striking portions of its reply.
- Telcordia Technologies [met with](#) Commissioners Rosenworcel, Pai and O'Rielly, and staff of Chairman Wheeler and Commissioner Clyburn on May 5, 2016, to urge the FCC to approve the Master Services Agreement between Telcordia and the NAPM on the LNP Administrator transition. Telcordia said until the MSA is approved, Telcordia cannot sign critical contracts that must be in place soon if the project is to stay on schedule. Telcordia also asserted the LNP Alliance's concerns that small carriers could incur large up-front costs as a result of the transition and that these costs could swamp any savings from the transition have no basis in reality. Telcordia also said the FCC should reject Neustar's [Application for Review](#) of the Wireline Competition Bureau's March 31, 2016 [Second Protective Order](#).

[Back to Highlights](#)

Upcoming Filing Dates

- May 20 - Comments due on MIX Network's [Application](#) to obtain telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator. [Public Notice](#)
- 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 27- Comments due on AT&T's [application](#) to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)
- 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 1 - Comments due on a joint petition filed by BPS Telephone and AT&T for a study area waiver. Replies due June 16 [Public Notice](#)
- June 3 - PRA comments due on an extension of a currently approved information collection in section 69.605, Reporting and Distribution of Pool Access Revenues. [Notice](#)
- June 3 - Comments due on a petition filed by the North Carolina Utilities Commission requesting FCC agreement with the NCUC's redefinition of certain Central Telephone Company wire centers associated with the exchanges of Elkin, Hays, Mulberry, North Wilkesboro, and State Road as a separate service area or areas. Replies due June 17. [Public Notice](#)
- June 10 - PRA comments due on a revision to a currently approved collection associated with FCC Forms 472 (billed entity applicant reimbursement form), 473 (E-rate service provider annual certification form), and 474 (service provider invoice form). [Notice](#)
- June 10 - The FCC published a in the Federal Register on May 11, 2016, seeking PRA comments on previously approved recordkeeping requirements imposed on ILECs that offer international, interexchange services to maintain books of account separate from such ILEC's local exchange and other activities. [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 16 - Replies due on a joint petition filed by BPS Telephone and AT&T for a study area waiver. [Public Notice](#)
- June 17 - Replies due on a petition filed by the North Carolina Utilities Commission requesting FCC agreement with the NCUC's redefinition of certain Central Telephone Company wire centers associated with the exchanges of Elkin, Hays, Mulberry, North Wilkesboro, and State Road as a separate service area or areas. [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. [FR](#)

- 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](#)
- June 28 - Comments due on the [FNPRM](#) proposing a new competition-triggered deregulatory framework for the provision of business data services that classifies markets as either non-competitive or competitive. Replies due July 26.
- July 11 - PRA comments due on a revision to a currently approved collection associated with FCC Forms 497 (Lifeline and Linkup worksheet), 555 (Annual Lifeline ETC Certification Form), and 481 (Carrier Annual Report Data Collection Form). [Notice](#)
- July 26 - Replies due on the [FNPRM](#) proposing a new competition-triggered deregulatory framework for the provision of business data services that classifies markets as either non-competitive or competitive.

[Back to Highlights](#)

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