

NECA's Weekly Federal Regulatory Summary

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June 10, 2019 HIGHLIGHTS

- The FCC adopted three items at its June 6, 2019 [Open Meeting](#), including a [Declaratory Ruling and Third FNPRM](#) clarifying that voice service providers may block illegal and unwanted calls as the default before they reach consumers' phones, and proposing a safe harbor for providers who block calls that fail call authentication, while ensuring that emergency and other critical calls reach consumers.
- The Wireline Competition Bureau issued a [Public Notice](#) making corrected A-CAM II offers for 37 study areas, which are identified in the Appendix. The Bureau also extended the election deadline for all A-CAM II offers until July 17, 2019. The Bureau seeks comment on supported location adjustment procedures. Comments are due 14 days after Federal Register publication.
- The FCC [announced](#) it is ready to authorize CAF Phase II Auction support for the Auction 903 winning bids identified in Attachment A of this Public Notice. Applicants are required to submit irrevocable standby letter(s) of credit and Bankruptcy Code opinion letter(s) by June 21, 2019.
- An [FCC Notice](#) was published in the Federal Register seeking PRA comments on a new information collection pursuant to the requirement that high-cost USF recipients test their broadband networks for compliance with speed and latency metrics and certify to and report the results to USAC on an annual basis. PRA comments are due July 8, 2019.
- An [FCC Notice](#) was published in the Federal Register seeking PRA comments on a revised information collection pursuant to the requirement that certain carriers with high-cost reporting obligations must file information about their locations that meet their broadband deployment obligations via USAC's HUBB. PRA comments are due August 5, 2019.
- NTCA [discussed](#) identification and reporting of locations where voice and broadband services are made available for purposes of compliance with deployment obligations.
- ITTA, WISPA, USTelecom, et al. [discussed](#) the endpoints for network testing of speed and latency.
- The Fourth [Report and Order](#) on rural call completion [is effective](#) July 5, 2019. The Order implemented the Improving Rural Call Quality and Reliability Act of 2017, which establishes service quality standards for intermediate providers, sets forth procedures to enforce intermediate provider requirements, and sunsets the rural call completion data recording and record retention requirements.
- ITTA and USTelecom [urged](#) the FCC to grant electing rate-of-return carriers nationwide relief from ex ante pricing regulation of their TDM transport services.
- The FCC issued a [Public Notice](#) on the process for carriers to obtain access to confidential information provided with 2019 annual access charge tariff filings in support of a carrier's tariff review plan.
- NTCA [urged](#) the FCC to adopt both prongs of its proposal to curb terminating access arbitrage, and encouraged the FCC to retain revenue sharing as a component of the definition of access stimulation.
- NTCA filed [comments](#) on the NANC's [report on nationwide number portability](#).

Other Key Upcoming Dates

- June 24 - Replies due on the [NPRM](#) on FY 2019 regulatory fees.
Editor: [Teresa Evert](#) | Assistant Editor: [Shawn O'Brien](#)

USF Reform

- The Wireline Competition Bureau issued a [Public Notice](#) on June 5, 2019, stating since the May 2, 2019 [Public Notice](#) that announced A-CAM II support to rate-of-return carriers that are still receiving legacy support, it identified errors related to 37 of those offers. The Public Notice makes corrected A-CAM II offers to those companies, which are identified in the Appendix. The Bureau said to provide carriers sufficient time to evaluate the corrected A-CAM II offers, it extended the deadline for acceptance by 30 days, and this extended deadline will apply to all A-CAM II offers, not only the ones the Bureau corrected in this Public Notice. Carriers have until July 17, 2019, to indicate, on a state-by-state basis, whether they elect to receive model-based support. If a carrier affected by one of these corrections has already filed an acceptance, it may withdraw its previous acceptance by the deadline if it chooses. The Bureau also seeks comment on approaches to identifying and resolving apparent discrepancies between the number of model-determined funded locations that A-CAM I and II support recipients are expected to serve and the actual number of locations that support recipients can serve. Comments are due 14 days after the date of publication of this Public Notice in the Federal Register.
- The Rural Broadband Auctions Task Force, Wireline Competition Bureau, and Office of Economics and Analytics issued a [Public Notice](#) on June 7, 2019, announcing they are ready to authorize CAF Phase II Auction support for the Auction 903 winning bids identified in Attachment A of this Public Notice. They said to be authorized to receive the total 10-year support amounts listed in Attachment A, the long-form applicants identified are required to submit acceptable irrevocable standby letter(s) of credit and Bankruptcy Code opinion letter(s) from their legal counsel for each state where they have winning bids that are ready to be authorized by the applicable deadline, which is 6:00 p.m. ET on Friday, June 21, 2019. They indicated Commission staff is reviewing information that is submitted with long-form applications on a rolling basis, and a long-form applicant that was not included in this Public Notice but that has submitted all of the required information will be included in a future Public Notice once Commission staff finalizes its review of the long-form application.
- An [FCC Notice](#) was published in the Federal Register on June 4, 2019, seeking PRA comments on a revised information collection pursuant to the requirement that certain carriers with high-cost reporting obligations must file information about their locations that meet their broadband deployment obligations via USAC's electronic portal. It noted: the 2016 Rate-of-Return Order required all recipients of CAF Phase II support and rate-of-return carriers to submit geocoded location data and related certifications to the portal; the Alaska Plan Order made portal reporting requirements for carriers to submit fiber/microwave middle-mile network maps; and the December 2018 Order adopted reforms that included additional offers of model-based support and increased deployment obligations. It said this information collection also addresses the new additional offers of model-based support and increased broadband deployment obligations. PRA comments are due August 5, 2019.
- An [FCC Notice](#) was published in the Federal Register on June 7, 2019, seeking PRA comments on a new information collection pursuant to the requirement that high-cost USF recipients test their broadband networks for compliance with speed and latency metrics and certify to and report the results to USAC on an annual basis. The Notice indicated carriers are to identify, from among the locations they have already certified in USAC's HUBB portal, the locations where they have an active subscriber, and USAC will then select a random sample from which the carrier will be required to perform testing for speed and latency. Carriers that did not provide location information in the HUBB will use a randomization tool provided by USAC to select a random sample of locations for testing. The carrier will then be required to submit to USAC the results of the testing on an annual basis. These filings will include the testing results for each quarter from the prior year. The carrier's sample for each service tier (e.g., 10 Mbps/1 Mbps, 25 Mbps/1 Mbps) shall be regenerated every two years. During the two-year cycle, carriers will have the ability to add and remove subscriber locations if necessary, e.g., as subscribership changes. PRA comments are due July 8, 2019.
- NTCA [met with](#) Wireline Competition Bureau staff on June 3, 2019, to urge the Bureau to provide further guidance on how recipients of cost-based USF support can demonstrate compliance with deployment obligations to the extent they were capable of delivering 25/3 Mbps broadband prior to May 25, 2016, the date the FCC set as a benchmark for determining compliance with deployment obligations. NTCA requested clarification of the process whereby USF recipients can identify to the

FCC a possible discrepancy in the locations that can be found in eligible areas subject to deployment obligations, such that providers can obtain reduced support to the extent that fewer locations are identified without threat or overhang of further penalty. NTCA also discussed how business locations in rural areas should be counted for purposes of compliance with deployment obligations. It suggested language the Bureau could direct USAC to use to modify its “Frequently Asked Questions.”

- ITTA, WISPA, USTelecom, AT&T, Verizon, Great Plains, CenturyLink, and Consolidated Communications [spoke with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on June 4, 2019, to discuss the endpoints for network testing of speed and latency. They reiterated the Commission should provide CAF recipients maximum flexibility as to such endpoints consistent with the Commission’s requirement that CAF recipients test to “the nearest Internet access point,” as well as goals of better measuring service from the customer’s perspective by reflecting where customer traffic is naturally routed to the internet. They discussed an idea whereby speed and latency testing could occur “from the end-user interface to the first public Internet gateway in the path of the CAF-supported customer that connects through a transitive Internet Autonomous System (AS).” They also suggested the Commission establish a safe harbor where the transitive Internet AS that the gateway hosts includes one or more router(s) that advertise(s) AS organizations that are listed on the Center for Applied Internet Data Analysis (CAIDA) “AS Organization Rank List,” and any testing architecture meeting safe harbor criteria would be considered valid without further inquiry.
- The Montana Telecommunications Association and several of its members [met with](#) Commissioner Carr and his Chief of Staff in Montana on May 28-31, 2019, to discuss the importance of maintaining CAF high cost support for continued investment in broadband deployment and the important link between Mobility Fund support and smart agriculture. They suggested the Broadband Digital Opportunity Fund should be designed to facilitate investment not only to complete the job of broadband deployment in rural areas served by MTA member companies, but also in those areas that have been neglected by their service providers. They also discussed rural healthcare and threats to the communications supply chain.
- Hughes Network Systems filed [a letter](#) on June 6, 2019, to provide more details, at the request of the Wireline Competition Bureau, on its earlier proposal for the Mean Opinion Score testing requirement for voice quality that the FCC adopted in 2014 for satellite operators that receive CAF funds. Hughes said its proposal for monitoring voice quality involves a combination of laboratory subjective testing and monitoring of the operational network. It said this approach should only be used on a prospective basis.

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ICC

- The FCC issued a [Public Notice](#) on June 4, 2019, on the process for carriers to obtain access to confidential information provided with 2019 annual access charge tariff filings in support of a carrier’s tariff review plan. The FCC said carriers seeking access to such confidential information must comply with the Protective Order contained in the 1997 Tariff Streamlining Order. The FCC attached the Protective Order and Declaration to the Public Notice.
- NTCA [met with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on May 31, 2019, to urge the FCC to adopt both prongs of its proposal to curb terminating access arbitrage. NTCA said the first prong of the Commission’s plan should be implemented with appropriate safeguards to protect innocent LECs that do not engage in access stimulation, suggesting the Commission either amend the text of section 51.914(a) of its proposed rule or clarify in its final rule that LECs that do not qualify as access stimulators, but who subtenant to the same CEA as those who do, will not be affected by prong 1. NTCA highlighted the benefits of the proposal to promote direct interconnection, i.e., prong 2. NTCA also encouraged the Commission to retain revenue sharing as a component of the definition of access stimulation.
- AT&T filed a [letter](#) on June 3, 2019, to respond to the decision of Aureon Network Services to defer the effective date of its new tariff filing until June 28, 2019, and to address arguments set forth in Aureon’s

May 10, 2019 [Reply](#) to AT&T's [Petition](#) that asked the FCC to reject or to suspend and investigate Aureon's revised tariff filed on April 29, 2019. AT&T said the Commission should reject Aureon's new tariff filing and prescribe a rate of \$0.00164/min for the period March 1, 2018 to June 27, 2019, and on a going forward basis. AT&T said, alternatively, the Commission should suspend Aureon's tariff for the full five-month period (thereby leaving the current rate of \$0.00296/min. in place) and set for investigation certain issues regarding Aureon's recent tariff filing.

- AT&T [met with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on June 4, 2019, to discuss the Aureon Network Services' recent tariff transmittals. AT&T responded to Aureon's proposed tariff filing (Transmittal Nos. 40 and 41) made on April 29, 2019 and May 10, 2019, and addressed its ongoing concerns related to Aureon's previous tariff filings (Transmittal Nos. 36 and 38). AT&T also discussed the issues raised in AT&T's May 6, 2019 [Petition](#) to Reject or Suspend, and in its June 3, 2019 [letter](#).

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Broadband

- Rep. Doug Collins (R-Ga.) sent a [letter](#) to Chairman Pai on June 3, 2019, requesting the FCC consider a more accurate and reliable approach to mapping broadband availability, particularly in rural areas. Rep. Collins also encouraged the FCC to develop a better method of verifying provider-reported broadband data to better inform the FCC's funding and financing. [Press release](#)
- Connected Nation filed a [letter](#) on June 7, 2019, following-up on its May 17, 2019 [ex parte](#) on broadband mapping. Connected Nation said there is value in the creation of a common dataset of locations nationwide (i.e., geolocated structures, or land parcels, such as cropland and rangeland, that may warrant broadband service delivery), on which broadband service availability information can be subsequently overlaid. It said there is a viable path forward that can involve both a polygon shapefile-driven reporting approach as well as the option to report addresses or ID numbers instead - both of which can be referenced against a more accurate underlying fabric of locations/structures.
- USTelecom, AT&T, CenturyLink, Consolidated, Frontier, Verizon, and Windstream [met with](#) Wireline Competition Bureau and Rural Broadband Auctions Task Force staff on May 29, 2019, to discuss the Rural Digital Opportunity Fund. They suggested the FCC approach the Rural Digital Opportunity Fund with a long-term vision, so it is not just a means for last-mile connections, but also a bridge to a 5G future in rural America. USTelecom also urged adoption of its broadband mapping initiative, which it says can serve as a basis for effectively and efficiently targeting support to all unserved rural locations.
- USTelecom, AT&T, CenturyLink, Frontier, and Verizon [met with](#) Chairman Pai and his Wireline Legal Advisor on June 3, 2019, in support of USTelecom's [Petition for Forbearance](#). They asserted the highly competitive modern communications marketplace and the negative impact on consumers and competition of maintaining an outdated regulatory regime justifies granting the Petition. They claimed no consumer or business will lose access to voice or broadband if relief is provided. They also said contrary to the arguments by Petition opponents, this is primarily an urban, business issue and not a rural or residential broadband issue.
- INCOMPAS, et al. [met with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on May 30, 2019, to discuss USTelecom's Petition for Forbearance. They discussed how their companies are able to use various unbundled network elements to offer business and residential customers competitive alternatives and as a foundation for investing in electronics and fiber facilities to be able to deliver faster services. They asked the Commission to reject USTelecom's Forbearance Petition, claiming forbearance will have a detrimental impact on their customers by reducing service offerings, eliminating choice in providers, increasing prices, and reducing service quality and integration options.
- First Communications filed a [letter](#) on June 6, 2019, on USTelecom's Petition for Forbearance. First Communications asserted USTelecom has not met its burden of proof to receive forbearance from any UNE obligations imposed on ILECs by section 251(c). It claimed loss of access to DS1 UNE loops

would have a devastating effect on First Communications' small and medium-sized business customers and a loss of access to UNE DS1 and DS3 transport would have an adverse impact on its residential and business customers. It suggested if the Commission adopts any UNE transport forbearance for Tier 1 and 2 Wire Centers, it should adopt, at a minimum, a seven- year transition period. It also attached a Second Supplemental Declaration of Mark Sollenberger, President of First Communications.

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Robocalls

- Babette Boliek, FCC Chief Economist, and Eric Burger, FCC Chief Technology Officer, posted [a blog](#) on June 5, 2019, noting the FCC is going to vote on June 6 to clarify that under the existing rules a phone company can step in to block unwanted calls. They said according to the most recent data compiled by YouMail, there were about 2.5 billion illegal robocalls in March 2019 alone, and the FCC estimates the cost of these calls to consumers is at least \$3 billion per year from lost time alone, not including monetary losses to fraud, and the cost for phone companies of handling service calls from consumers can be more than \$10 per call. They said setting a call-blocking service as the default can significantly increase consumer participation while keeping consumer choice. They asserted, based on the volume of consumer complaints the FCC has received – well over 200,000 per year, the FCC believes most consumers would prefer to have blocking in place.
- Reply comments were filed on June 3, 2019, on the Petitions for Reconsideration of the Reassigned Numbers Database [Order](#) filed by [CCA, et al.](#) and the [Professional Association for Customer Engagement](#). [iconectiv](#) said it questions whether the requested reconsideration of the language in the Order concerning the contracting approach for selecting a vendor for the reassigned numbers database is required because it does not believe the prospective language in any way legally binds the Commission to acquiring the services in the suggested manner. iconectiv noted the Chair of the NANC, who the Commission has tasked with identifying the most efficacious way of getting the reassigned numbers database up and running quickly and efficiently, recently wrote to the Commission that its working group “anticipates the [RNDB] will have few administrative and functional similarities with the NANPA/PA system.” It said to the extent reconsideration is necessary, iconectiv fully supports the Petition. The [Competitive Carriers Association, CTIA, and USTelecom](#) said their proposal to bifurcate the administration of the NANPA and Pooling Administrator functions from the database administration is the fastest way to get the database up and running. They said their corollary proposal to provide flexibility to propose a funding mechanism other than the billing and collection methodology in the Order can also serve to establish the database more rapidly.
- A number of ex partes were filed on the [draft Declaratory Ruling and FNPRM](#) on blocking of robocalls. [The American Bankers Association](#), the American Association of Healthcare Administrative Management, the National Association of Federally-Insured Credit Unions, ACA International, the American Financial Services Association, PRA Group, the Credit Union National Association, the Consumer Bankers Association, and the Mortgage Bankers Association met with Chairman Pai's Public Safety and Consumer Protection Advisor on May 29, 2019, to express concern that the draft call-blocking Declaratory Ruling could harm consumers by resulting in the erroneous blocking of lawful, and often urgent, calls affecting consumer health, safety, and financial well-being. The Associations asserted the draft Ruling is contrary to the Communications Act and Commission precedent and urged the Commission to seek comment on the proposals in the draft Ruling by recasting it as an NPRM. They suggested the Commission clarify that blocking would apply only to illegal, and not “unwanted,” calls and should propose there be sufficient notice of blocking to the caller and to the call recipient and provide a mechanism for prompt release of any erroneously blocked numbers. [Free Press](#) spoke with Advisors to Commissioners Starks and Rosenworcel on May 30, 2019, to discuss the letters filed by: Public Knowledge, explaining the likelihood of false positives in blocking by carriers, suggesting a more robust process for addressing such mistakes, and highlighting the potential for unintended or purposeful anti-competitive results if incumbents' analytics unreasonably discriminate against competitive or over-the-top services; INCOMPAS, proposing additional language to ensure that analytics for call blocking programs [are] applied in a non-discriminatory, competitively neutral manner with a transparent process for prospectively correcting blocking of wanted calls; and PRA Group, saying the draft appears to cite no express statutory authority for authorizing carriers' call-blocking by

default in the absence of explicit customer consent and action and blurs the distinction between illegal calls and calls that are lawful but merely unwanted. Free Press said if the Commission merely empowers carriers to make choices on behalf of their customers, without providing complete information or ensuring sufficient accountability for such decisions, then even if the framework is a net positive it may lead to the wrong outcomes. [AAHAM](#), [Twilio](#), and [Consumer Reports](#) also filed *ex partes*.

- The American Bankers Association filed [a letter](#) on June 3, 2019, in response to Twilio's May 31, 2019, [ex parte filing](#) that asserted calls placed using its platform, which are often placed to a large number of recipients during an emergency, "could be blocked or mislabeled if a carrier's call-blocking algorithm is based on large bursts of calls in a short timeframe, low average call duration, or low call-completion ratio." ABA said it shares Twilio's concerns that the Declaratory Ruling, if adopted as drafted, would result in the erroneous blocking of lawful calls, including fraud alerts and other informational calls placed by banks. It urged the Commission to seek comment on the proposals in the draft Declaratory Ruling by recasting it as an NPRM and, as part of that NPR, the Commission should clarify that blocking would apply only to illegal, not "unwanted," calls. ABA also suggested the Commission propose there be sufficient notice of blocking to the caller and to the call recipient and propose to provide a mechanism for prompt release of any erroneously blocked numbers.
- Insights Association filed [a letter](#) on June 5, 2019, expressing support for the FCC's efforts to combat illegal and fraudulent phone calls. It said the Declaratory Ruling, however, would likely result in lawful calls for purposes of bona fide marketing research being presumptively and erroneously blocked by voice service providers, with the callers never even knowing they were blocked nor being given the opportunity to be unblocked. Insights urged the FCC to issue clear guidance for voice service providers to distinguishing between types of calls, promote national standards for informing voice service providers and callers if a lawful call has been blocked, and require voice service providers and call blocking and labeling providers to offer useable mitigation and remediation options for lawful calls and callers subject to erroneous blocking.

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Call Completion

- The FCC published in the [Federal Register](#) on June 4, 2019, the Fourth [Report and Order](#) on rural call completion, which was issued on March 15, 2019. The Order implemented the Improving Rural Call Quality and Reliability Act of 2017, which establishes service quality standards for intermediate providers, sets forth procedures to enforce intermediate provider requirements, and sunsets the rural call completion data recording and retention requirements. The Order is effective July 5, 2019.

Universal Service

- Telcel Communications, People Telephone Cooperative, and Central Texas Telephone Cooperative met separately with Advisors to [Chairman Pai](#) and [Commissioner O'Rielly](#) on May 30, 2019, to discuss their [Petition for Rulemaking](#) that requested the FCC adopt rules that prohibit the use of universal service funds for special construction of fiber networks that overbuild existing fiber networks.
- XO Communications filed a [letter](#) June 4, 2019, on its 2017 [Application for Review](#) of the [Order](#) denying requests for review of decisions on whether certain revenues associated with specific mixed-use special access lines should be considered interstate for the purpose of assessing USF contributions. XO said if the Commission does not overturn the Private Line Order, it should follow its precedent in the InterCall or Anda Orders and order that the new evidentiary standards created in the Private Line Order be applied only prospectively, to services provided on or after the date of the Order.
- Q Link Wireless [met with](#) Wireline Competition Bureau staff on June 3, 2019, to discuss its [Petition](#) seeking a waiver to use an alternative transmission of Lifeline eligibility information and customer certifications to the National Verifier. Q Link reiterated that providing an alternative means of transferring data to USAC and the National Verifier using the bulk transfer method would be consistent

with the Commission's National Verifier objectives. Q Link also said proceeding with hard launches and re-verification de-enrollments prior to implementing necessary improvements to the National Verifier is inconsistent with Chairman Pai's stated goal of ensuring that eligible subscribers are not de-enrolled through false negatives in the re-verification process.

- Broadband VI filed a [request](#) on June 5, 2019, to withdraw its October 2018 [Petition](#) seeking a waiver of the Lifeline minimum service standards. BBI said it is now compliant with the current 18/2 Mbps speed standard.
- Tata Communications [spoke with](#) Wireline Competition Bureau staff on June 4, 2019, to discuss its [Petition](#) for a waiver of the rules to allow it to continue to contribute to the USF based solely on its interstate end-user telecommunications revenues, as it does today pursuant to the Limited International Revenue Exemption. Tata claimed it should receive relief from the 12 percent limited international revenue exemption threshold.

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State Actions

- Alabama Governor Kay Ivey [signed](#) two broadband bills into law on May 30, 2019, which seek to target rural and small communities that are often underserved by high speed internet. [HB400](#) will allow electricity providers to use existing infrastructure to provide broadband services, and [SB90](#) expands who can apply for grants used to improve broadband accessibility.
- The Center for Rural Pennsylvania [released](#) a report on June 3, 2019, entitled [Broadband Availability and Access in Rural Pennsylvania](#). It said the report shows there is not a single Pennsylvania county where at least 50 percent of the population receives broadband connectivity, as defined by the FCC as 25/3 Mbps. It said over 11 million broadband speed tests from across Pennsylvania were collected for this research.

Misc.

- The FCC released items on June 7, 2019, which were adopted at its June 6, 2019 [Open Meeting](#). It released the [Declaratory Ruling and Third FNPRM](#) clarifying that voice service providers may block illegal and unwanted calls as the default before they reach consumers' phones, and proposing a safe harbor for providers who block calls that fail call authentication, while ensuring that emergency and other critical calls reach consumers. The FCC also released a [Report and Order and Second FNPRM](#) vacating its 2008 Leased Access Order, modernizing the leased access rules to reflect changes in the video programming market, and simplifying the leased access rate formula; and an [NPRM](#) that proposes to modernize the Commission's rules to improve aviation safety, support the deployment of more advanced avionics technology, and increase the efficient use of limited spectrum resources.
- ITTA and USTelecom filed [a letter](#) on June 6, 2019, in support of deregulating transport services provided by rate-of-return carriers that currently receive model-based or other forms of fixed high-cost USF support and that elect to transition their business data services offerings out of RoR regulation. They claimed the company-specific information provided in the letter demonstrates that in recent years RoR carrier TDM transport revenue has declined sharply and that this evidence of competition to RoR carriers' TDM transport offerings is consistent with the Commission's findings of substantial competition to TDM transport in price cap areas. They claimed it is also consistent with a recent industry report issued by Atlantic-ACM containing market intelligence confirming that demand for price cap and RoR ILECs' TDM-based BDS, including TDM transport, continues to fall as wholesale purchasers shift toward higher capacity Ethernet, Wavelength, and other IP-based services available from a variety of suppliers.
- Comments were filed on June 3, 2019, on the [Public Notice](#) asking how to structure an auction to distribute certain toll free numbers in the new 833 toll free code. [Verizon](#) asserted the Public Notice would impose information-gathering burdens on RespOrgs that go well beyond their current

capabilities. Verizon suggested the Commission instead impose a more narrow and well-defined approach to gathering this information from RespOrgs, and suggested the Commission consider alternatives, such as exercising its existing authority to investigate the use of number resources, applied on a more targeted basis. [CenturyLink](#) supported the FCC's proposal to allow auction participants to bid on toll free numbers either on their own or through their respective RespOrgs. CenturyLink also agreed with the FCC's proposal that a bidder participate in the same manner for all numbers, and not selectively bid on some numbers through the RespOrg while bidding on others directly. [ATIS](#) said the RespOrg should only be responsible for updating information for which they are aware, saying they cannot and should not be required to update information they do not have, and they should not be presumed to have knowledge from billing records or Letters of Agency. Replies are due June 10, 2019. Comments were also filed by [1800 Contacts](#).

- The Senate Committee on Commerce, Science, & Transportation announced it will hold a [hearing](#) on June 12, 2019, entitled Oversight of the FCC. Witnesses include Chairman Pai and all four Commissioners.
- NTCA filed [comments](#) on June 7, 2019, on the North American Numbering Council's [Additional Findings Report on Nationwide Number Portability](#) submitted to the Wireline Competition Bureau. NTCA said any voice provider can, if it so chooses, market and provide NNP today via the use of commercial agreements with operators that can provide any transport or other features necessary to support this functionality. NTCA asserted this is the most direct and immediate route to the desired outcome, as it is the least complicated, least time-consuming, and least disruptive means of allowing those that want to provide NNP capability to consumers the ability to take the steps to do so. [Public Notice](#)
- Comments were filed on June 7, 2019, on the [NPRM](#) on the assessment and collection of regulatory fees for FY 2019. [CenturyLink](#) said the Commission should adjust the fees applicable to international bearer circuits to better align the fees imposed with the statutory requirement that such fees be related to the benefits provided to the payor of the fee by the Commission's activities. It also said the FCC should re-allocate the distribution of fees between submarine cables and other IBCs. The [National Association of Broadcasters](#) said the NPRM proposes extraordinary regulatory fee increases for radio stations for Fiscal Year 2019, while providing little or no explanation. It urged the Commission to provide further information to allow stakeholders to constructively participate in this proceeding and to reconsider the basis on which it determines which entities are subject to regulatory fees. [Echostar Satellite, et al.](#) said because the Commission does not provide a sufficient description of the substantial annual fee increases for geostationary orbit space station, non-geostationary orbit space station, and earth station licenses, companies subject to regulatory fees do not have a meaningful basis on which to comment in this proceeding. [All comments available to date](#). Replies are due June 24, 2019.
- The Consumer and Governmental Affairs Bureau issued six Orders on Reconsideration on June 3, 2019, addressing petitions filed by [Discount Long Distance](#), [Small Business America](#), [Long Distance Access](#), [Charter Communications](#), [Sprint Nextel Corporation](#), and [Affordable Long Distance](#) asking it to reconsider orders finding that each provider changed a consumer's telecommunications service provider without proper authorization verified in accordance with the Commission's slamming rules. The Bureau granted the requests made by Charter and Sprint, but denied the other four petitions.
- The Consumer and Governmental Affairs Bureau issued Orders on June 5, 2019, denying complaints alleging [VarTec Telecom](#) and [MCI](#) changed complainants' telecommunications service provider without obtaining authorization and verification from complainants in violation of the Commission's rules. The Bureau found the providers' actions did not result in an unauthorized change in complainant's telecommunications service provider and denied the complaints.

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Upcoming Filing Dates

- June 10 - Replies due on the [Public Notice](#) asking how to structure an auction to distribute certain toll free numbers in the new 833 toll free code.

- June 11 - Comments due on Alaska Communications Internet's application for authorization to obtain NANP telephone numbers directly from the Numbering Administrators for its iVoIP service. [PN](#)
- June 12 - Comments due on a 214 application filed by the Chester Telephone Company, d/b/a Tru-Vista Communications, and York Telecoms Holdings requesting consent to transfer control of TruVista and its wholly owned subsidiaries to York. Replies are due June 19, 2019. [Public Notice](#)
- June 19 - Replies due on a 214 application filed by the Chester Telephone Company, d/b/a Tru-Vista Communications, and York Telecoms Holdings requesting consent to transfer control of TruVista and its wholly owned subsidiaries to York. [Public Notice](#)
- June 21 - PRA comments due on an extension of a currently approved information collection associated with Form 502, Numbering Resource Optimization. [Notice](#)
- June 24 - Replies due on Reservation Telephone and CenturyLink study area waiver petition in North Dakota. [Notice](#)
- June 24 - PRA comments due revision of a currently approved information collection for high-cost USF support. The FCC indicated in the December 13, 2018 Rate-of-Return USF Reform. [Order FR](#)
- June 24 - Replies due on the [NPRM](#) on May 8, 2019, seeking comment on the assessment and collection of regulatory fees for FY 2019.
- June 24 - PRA comments due on a revision of a currently approved information collection associated with FCC Forms 460, 461, 462, 463, 465, 466, and 467 (Rural Health Care Program). [Notice](#)
- June 24 - Comments due on the computer matching program the FCC and USAC will conduct with agencies from the States of Georgia and Iowa. [Notice](#)
- June 25 - PRA comments due on an extension of a currently approved information collection on the survey of urban rates for fixed voice and broadband residential services. [Notice](#)
- July 1 - Comments due on a [Petition](#) for a rulemaking filed by Central Texas Telephone, et al. urging the FCC to consider adopting rules that prohibit the use of universal service funds for special construction of fiber networks that overbuild existing fiber networks. Replies due July 16, 2019. [PN](#)
- July 8 - PRA comments are due on a new information collection pursuant to the requirement that high-cost USF recipients test their broadband networks for compliance with speed and latency metrics and certify to and report the results to USAC on an annual basis. [Notice](#)
- July 16 - Replies due on a [Petition](#) for a rulemaking filed by Central Texas Telephone, et al. urging the FCC to consider adopting rules that prohibit the use of universal service funds for special construction of fiber networks that overbuild existing fiber networks. [Public Notice](#)
- July 19 - PRA comments due on an extension of a currently approved information collection associated with telephone number portability rules (sections 52.21 through 52.36). [Notice](#)
- Aug. 5 - PRA comments due on a revised information collection pursuant to the requirement that certain carriers with high-cost reporting obligations must file information about their locations that meet their broadband deployment public interest obligations via USAC's electronic portal. [FCC Notice](#)

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