

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

June 20, 2016 HIGHLIGHTS

- The FCC issued the [agenda](#) for its June 24, 2016 Open Meeting, and will consider: a NPRM proposing changes to streamline and increase the transparency of Executive Branch review of applications and petitions for national security, law enforcement, foreign policy, and trade policy concerns; a Report and Order that would revise the Emergency Alert System rules by adding new event codes; and a Report and Order to require submarine cable licensees to report communications network outages to the FCC.
- The D.C. Circuit issued a [Decision](#) denying all of the petitions for review of the FCC's 2015 Open Internet [Order](#). Chairman Wheeler and the FCC Commissioners issued [statements](#). The White House also issued a [statement](#).
- The WCB [clarified](#) several issues arising from implementation of the Rate-of-Return USF Reform [Order](#).
- The WCB also issued an [Erratum](#) to the May 26, 2016 [Report and Order and FNPRM](#) on the CAF Phase II auction procedures, making certain corrections to the text.
- The WCB [denied](#) ACS' [Petition](#) for waiver of the requirement that a carrier accepting CAF Phase I incremental support deploy 4/1 Mbps service to one unserved location for every \$775 in support.
- The WCB [denied](#) Bretton Woods' [Petition](#) seeking to adjust total housing unit data to be utilized in calculating its OpEx limitation that was recently adopted in the RoR USF Reform Order.
- [Reply comments](#) were filed on the Rate-of-Return USF Reform [FNPRM](#).
- NECA [responded](#) to WCB questions on the method for determining broadband-only loop investment and expenses, particularly related to the methodology proposed in NTCA's [Petition for Reconsideration](#).
- NECA [discussed](#) the RoR USF Reform [FNPRM](#) and provided background information on its governance, structure, and tariff administration for RoR carriers.
- Dickey Rural Networks, the VTX1 Companies, the Tenino and Kalama Telephone Companies, and WTA [said](#) they are unable to elect the model path due to their build-out status or it would greatly reduce support amounts.
- ATA [detailed](#) the Remote Alaska Mobile Infrastructure portion of the Alaska Plan and also [submitted](#) revised rules for the implementation of the proposed Alaska Infrastructure Fund. AT&T [discussed](#) its concerns with the wireless provisions contained in the proposed Alaska Plan.
- Hargray Communications [discussed](#) relative priorities of issues raised in petitions for reconsideration of the RoR USF Reform Order and timing concerns related to implementation of USF reform.
- Radcliffe Telephone [asked](#) the FCC to re-examine data used to determine its A-CAM support amounts.
- NECA [asked](#) the FCC to take prompt action now that the comment period is over on refreshing the record on the petitions filed by [SIC](#), [AT&T](#) and [NECA](#) of the [2010 Declaratory Ruling](#) on SIC's cable network lease costs.
- The WCB [approved](#) NECA's [2016 Further Modification of Average Schedule Universal Service Support Formula](#).
- The FCC [announced](#) the proposed USF contribution factor for the third quarter of 2016 will be 17.9 percent, unchanged from last quarter.

Other Key Upcoming Dates

- 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.
- June 28 - Comments due on the [FNPRM](#) on a new deregulatory framework for business data services that classifies markets as either non-competitive or competitive. Replies due July 26.

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

USF Reform

- The Wireline Competition Bureau released an [Order](#) on June 15, 2016, clarifying several issues arising from implementation of the Rate-of-Return USF Reform [Order](#). These issues include: the transfer of exchanges; application of the monthly per-line limit on universal service support; A-CAM and Transitional Support budget; timing of operating expense limitation and reductions in the authorized rate of return; additional guidance regarding operating expense limitation; timing of the Capital Investment Allowance; additional guidance regarding the Capital Investment Allowance; average schedule carrier participation in the NECA traffic sensitive pool; determining the Consumer Broadband-Only Loop investment and expenses; calculation of the Budget Control; and the USF contributions treatment of non-tariffed services.
- The Wireline Competition Bureau issued an [Order](#) on June 17, 2016, denying a [Petition](#) filed by ACS for waiver of the requirement that a carrier accepting CAF Phase I incremental support deploy 4 Mbps/1 Mbps service to one unserved location for every \$775 in support, arguing this would give it more flexibility in meeting its Phase I obligations. The Bureau concluded the special circumstances alleged by ACS are insufficient to justify a waiver and grant of a waiver would not be in the public interest. It ordered USAC to recover support to the extent that ACS has failed to meet the requirements for Phase I incremental support.
- The Wireline Competition Bureau issued an [Order](#) on June 17, 2016, denying Bretton Woods Telephone Company's [Petition](#) seeking to adjust total housing unit data to be utilized in calculating its operating expense limitation that the Commission recently adopted in the RoR USF Reform Order. The Bureau said the Census Bureau excludes dormitories from the definition of housing unit, and therefore the dorms and the boarding house are not housing units under the framework adopted by the Commission. The Bureau also said, with respect to the caretaker house and the six cabins, BWTC provided insufficient evidence to show that they are in fact housing units as opposed to transient hotel lodging or buildings for equipment storage.
- The Wireline Competition Bureau issued an [Erratum](#) on June 13, 2016, to the May 26, 2016 [Report and Order and FNPRM](#) on the CAF Phase II auction procedures. The Erratum made certain corrections to the text of the Order and FNPRM and Appendices A and C.
- Reply comments were filed on the Rate-of-Return USF Reform [FNPRM](#) on June 13, 2016. [NTCA](#) said the record confirms the effectiveness of current systems in helping to ensure that only reasonable business expenses that are "used and useful" in the provision of regulated services are recoverable via high-cost support and/or interstate rates and, therefore, at most, targeted prospective clarity of certain rules would be useful in drawing brighter lines. It said the record and legal analysis make clear the Commission cannot create an open-ended general exception to the "deemed lawful" provisions of section 204 for any instance involving incorrect certification of company data, and said the Commission should address the problem of a "regulatory black hole," wherein carriers are required by rules to assign costs to certain accounts only to then be denied a reasonable opportunity to recover those costs. [WTA](#) said it does not oppose reasonable and prudent guidelines and ranges for certain types of operating expenses, but said specific limits on certain expenses are very difficult to develop and implement equitably for hundreds of high-cost support recipients of varying sizes that operate under very different conditions and circumstances, and across-the-board prohibitions and disallowances are also problematic. WTA stressed that any new rules prohibiting or limiting the inclusion of specified expenses in revenue requirements or high-cost support calculations should be implemented on a prospective basis only. WTA agreed with the "Tribal Broadband Factor" concept proposed by NTTA, but has concerns about the potential use of "Tribal lands" as the standard for designating the areas eligible for support with this mechanism. The [Eastern Rural Telecom Association](#) said the "alleged abuses" identified by the Commission are isolated events that should not dictate wholesale industry-wide changes. ERTA also said the Commission recently set out rules that will result in major changes to RoR carriers and it would be prudent to evaluate the impacts of these changes before adding additional changes. It suggested that if the Commission finds it prudent to act now, then it should have a goal of simplifying rules and making changes on a prospective basis only. [ATA](#) agreed "there is a need for the Commission to clarify what expenses may or may not be included in carrier rate bases

and universal service data submissions,” and that new rules adopted in this proceeding should be clear and simple and should apply on a prospective basis. ATA asserted the costs for watercraft and off-road vehicles as used by Alaskan carriers are both used and useful and a prudent expenditure, and thus should not be excluded from the interstate rate base nor from calculation of high-cost USF support. The [Navajo Nation Telecommunications Regulatory Commission](#) said it supports GRTI, NTTA and others’ proposal for the FCC to provide more flexibility in OpEx limits to reflect the higher cost of doing business in Indian Country by allowing carriers to increase their OpEx using a formula that includes a 2.5 standard deviation factor. NNTRC also supports inclusion of some currently excluded expenses and a Tribal Broadband Factor of 25 percent. NNTRC argued all of these changes should be accompanied by Tribal engagement requirements. [List of all replies available to date.](#)

- NECA [met with](#) Wireline Competition Bureau staff on June 10, 2016, to respond to questions regarding the method for determining broadband-only loop investment and expenses, particularly related to the methodology proposed by NTCA in its recent [Petition for Reconsideration](#). NECA discussed the various cost allocation methods for assigning broadband-only loop investment and expenses in existing Parts 36 and 69 rules, as well as some of the analyses required to isolate costs specifically for broadband-only loop costs, consistent with the methodology proposed by NTCA. NECA also responded to questions regarding the need to modify the corporate operations expense limitation calculation to include broadband-only loop counts.
- NECA [met with](#) Wireline Competition Bureau staff on June 14, 2016, to discuss the March 30, 2016 [FNPRM](#) on USF reform for rate-of-return carriers. NECA provided background information on NECA’s governance, structure, and tariff administration for RoR carriers.
- NECA [met with](#) the Legal Advisors of Chairman Wheeler and Commissioners Rosenworcel, Pai, Clyburn, and O’Rielly, and the Associate General Counsel, OGC, on June 15 and 16, 2016, to discuss the March 30, 2016 Rate-of-Return USF Reform FNPRM. NECA provided background information on NECA’s governance, structure and tariff administration for RoR carriers.
- Dickey Rural Networks, the VTX1 Companies, the Tenino and Kalama Telephone Companies, and WTA [met with](#) Commissioner O’Rielly’s Legal Advisor on June 14, 2016, to explain that none of the companies are able to elect the model path either because they were precluded due to their build-out status or because their calculated model-based support was so much lower than their existing support. WTA indicated it sought reconsideration of the USF Reform Order to request a streamlined procedure for revising build-out obligations if fiber optic cable and contract construction services become much more expensive or unavailable during the industry-wide broadband construction programs, and reconsideration of the definition of “qualified unsubsidized competitor” to require an entity seeking that status to offer the same broadband speeds and comply with the same service obligations as the ILEC if it is to cause the loss of some or all of the ILEC’s support. WTA also requested that any contemplated broadband CPNI rules not place significant additional compliance and security costs and liabilities upon rural ILECs. They also met with [Commissioner Rosenworcel’s](#) Legal Advisor to discuss the same issues, and, along with GVNW and YK Communications, [met with](#) Commissioner Pai’s Legal Advisor and [with](#) Commissioner Clyburn’s Legal Advisor on June 16, 2016, to discuss the same issues.
- The Alaska Telephone Association filed a [letter](#) on June 10, 2016, to explain the Remote Alaska Mobile Infrastructure Plan is the portion of the Alaska Plan designed for mobile CETCs that are already serving remote Alaska, and would provide support for those census blocks in remote Alaska where no facilities-based nationwide CMRS provider offers LTE to 85% or more of the population and a CETC serves 15% or more of the population with some form of mobile service, even a voice-only service. ATA elaborated three ways in which approving the Alaska Plan without further adjustment for minor overlap will “maximize coverage,” and urged the Commission to consider the practical difficulties of holding an auction for ongoing support for mobile service in remote Alaska. ATA urged the Commission to adopt the Alaska Plan as proposed.
- The Alaska Telephone Association filed a [letter](#) on June 16, 2016, to submit revised rules for the implementation of the proposed Alaska Infrastructure Fund.

- AT&T [spoke with](#) Commissioner O'Rielly's Legal Advisor on June 14, 2016, to discuss the wireless provisions contained in the proposed Alaska Plan and reiterated its concerns about the plan.
- Hargray Communications [met with](#) Wireline Competition Bureau staff on June 9, 2016, to discuss relative priorities of issues raised in petitions for reconsideration of the RoR USF Reform Order and timing concerns related to implementation of USF reform. Hargray said if the FCC can start the process of determining the level of competitive overlap by publishing the set of census blocks listed on FCC Form 477 as served by potential competitors, companies will be able to make a more informed model election. Hargray said imputation of ARC charges for broadband lines that were in service when intercarrier benchmarks were set was not appropriate, and suggested that an average of the count from two successive year-end studies could be used to estimate the count as of July 1st of any given year. Hargray also reiterated its support for using the A-CAM model only on a voluntary basis and cautioned against any plan that expanded its use on a mandatory basis.
- Vantage Point Solutions [spoke with](#) Wireline Competition Bureau staff on June 14, 2016, to discuss James Valley Cooperative's letter regarding the revisions made to their June 2015 Form 477 data. It reviewed paragraphs 56 and 66 of the RoR USF Reform [Order](#) and their applicability to James Valley's situation. Vantage Point also [discussed](#) Baraga Telephone Company's motion to reconsider certain provisions of the USF Reform Order.
- Radcliffe Telephone Company filed a [letter](#) on June 14, 2016, to request that the Commission re-examine the data used to determine the amount of A-CAM model-based support for which the company is eligible. Radcliffe Telephone said it is concerned the Wireline Competition Bureau may have used data attributable to another carrier in determining the amount of the company's model-based support. Radcliffe Telephone requested that the Commission confirm the accuracy of the data used to ensure there is no error in the support determination should the company elect to receive model-based support rather than legacy support.
- Plateau Telecommunications filed an [Amendment](#) on June 16, 2016, to its [Petition for Waiver](#) of certain Commission rules regarding Mobility Fund Phase I support, which requested an extension of the June 20, 2016, three-year deadline for submitting drive test data that demonstrates network coverage. Plateau said it completed construction of the 4G network in four census tracts associated with Study Area Codes 498013, 498014, 498017, and 498019, but Plateau will not be able to submit drive test data by the three-year deadline. Plateau also amended the Petition to request an extension of time, until after the FCC acts favorably on the Petition, to submit documentation regarding coverage in three other census tracts.
- U.S. Cellular sent a [letter](#) to James Schlichting of the Wireless Telecommunications Bureau on June 15, 2016, as a follow-up to a discussion pertaining to Mobility Fund Auction 901 costs. U.S. Cellular provided its observations on the variations in costs by state for the categories of antenna and radio equipment costs.

[Back to Highlights](#)

Open Internet

- The D.C. Circuit issued a [Decision](#) on June 14, 2016, denying all of the petitions for review of the FCC's March 12, 2015 Open Internet [Report and Order on Remand, Declaratory Ruling and Order](#). The court held that the Commission has statutory authority to classify broadband as a telecommunications service, and found the Commission's reclassification of mobile broadband as a commercial mobile service is reasonable and supported by the record. The court also denied challenges to the Commission decision to forbear from numerous provisions of the Communications Act, and rejected challenges to the rules promulgated in the Order that ban blocking, throttling, paid prioritization, and impose a general conduct rule and an enhanced transparency rule.
- Chairman Wheeler and the FCC Commissioners issued [statements](#) on June 14, 2016, on the D.C. Circuit Court's [Decision](#) that denied all of the petitions for review of the FCC's March 12, 2015 Open

Internet [Order](#). Chairman Wheeler and Commissioners Clyburn and Rosenworcel supported the court decision, and Commissioners Pai and O’Rielly did not support it. The White House also issued a [statement](#), saying the ruling recognizes that an Open Internet is essential for preserving an environment that encourages new investment in the network, new online services and content, and everything else that makes up the Internet.

- The Senate Commerce, Science, and Transportation Committee [approved](#) three bills and multiple nominations on June 15, 2016, including [S. 2283](#), the Small Business Broadband Deployment Act of 2015, which will exempt small ISPs from the enhanced transparency rules adopted in the 2015 Open Internet [Order](#). The exemption will be for three years or until the FCC completes a report to Congress recommending whether the exemption should become permanent.
- Seventeen public interest organizations [released](#) the [2016 Internet Policy Platform](#), which features specific policy proposals to advance free speech, access, choice, privacy, transparency, and openness. They also said the Platform has been sent to the chairs of both political parties and to presidential candidates, indicating the groups endorsing the platform seek to ensure that both parties and their candidates prioritize specific internet and technology policies that promote an open, affordable and secure internet for all. They also called on policymakers to expand internet access and make it more affordable, protect Net Neutrality, oppose government-mandated backdoors into communications technologies, and promote competition among internet service providers.

Broadband

- The House Subcommittee on Communications and Technology [announced](#) the witnesses for the June 14, 2016 [hearing](#), entitled “FCC Overreach: Examining the Proposed Privacy Rules.” Witnesses include: Doug Brake, Telecommunications Policy Analyst, Information Technology and Innovation Foundation; the Honorable Jon Leibowitz, Co-Chair, 21st Century Privacy Coalition; and Paul Ohm, Professor, Center on Privacy and Technology, Georgetown University Law Center. The hearing webcast will be available at <http://energycommerce.house.gov/>.

[Back to Highlights](#)

USF

- The FCC Managing Director issued a [Public Notice](#) on June 14, 2016, announcing that the proposed universal service contribution factor for the third quarter of 2016 will be 17.9 percent, unchanged from last quarter.
- The Wireline Competition Bureau issued a [Public Notice](#) on June 15, 2016, reminding Healthcare Connect Fund consortia of their requirement to file Funding Year 2015 Annual Reports by September 30, 2016, to help USAC and the Commission assess progress towards HCF’s program goals, as required by the 2012 Healthcare Connect Fund [Order](#). Reports must include information on how their program-supported services are being used for telehealth purposes, including for the exchange of electronic health records, participation in a health information exchange, remote training related to the delivery of telehealth services, and clinical telemedicine applications.
- Twenty-five U.S. Senators sent a [letter](#) to Chairman Wheeler on June 16, 2016, expressing concern with recent FCC actions on universal service, including the decision to curtail what they call “the important state role in preventing waste, fraud, and abuse in the Lifeline program” and the proposal to implement a National Verifier to verify consumer eligibility for the program. They asserted that given that data about program eligibility for Lifeline is typically housed at the state level, it could be more efficient and cost-effective to allow states to continue serving as the primary verifiers of applicant eligibility, and suggested the FCC focus on working with the states to ensure they have the information needed to perform robust checks of applicant eligibility.

- To date, no replies were filed on a joint petition filed by BPS Telephone and AT&T for a study area waiver. [Public Notice](#)
- To date, no replies were filed 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](#)

[Back to Highlights](#)

Misc.

- The FCC issued the [agenda](#) for its June 24, 2016 Open Meeting. The FCC will consider: a NPRM proposing changes to streamline and increase the transparency of the Executive Branch review of applications and petitions for national security, law enforcement, foreign policy, and trade policy concerns; a Report and Order that would revise the Emergency Alert System rules by adding new event codes; and a Report and Order to require submarine cable licensees to report communications network outages to the FCC. The FCC will also consider seven media-related items as consent agenda.
- The Wireline Competition Bureau released an [Order](#) on June 17, 2016, approving NECA's [2016 Further Modification of Average Schedule Universal Service Support Formula](#), which was filed in compliance with the March 30, 2016 Rate-of-Return USF Reform Order.
- NECA [met with](#) Senior Legal Advisors to Chairman Wheeler and Commissioner Rosenworcel, Legal Advisors to Commissioners Pai, Clyburn, and O'Rielly, and the Associate General Counsel on June 15, 2016, to urge the FCC to take prompt action now that the comment period is over on refreshing 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 also [met with](#) General Counsel staff on June 16, 2016, and [with](#) Wireline Competition Bureau staff on June 14, 2016, to discuss similar issues.
- The Senate Appropriations Committee [approved](#) the FY 2017 Financial Services and General Government Appropriations Bill on June 16, 2016, which includes \$341 million for the FCC. This amount is less than the \$358.3 million requested and less than the FCC's FY 2016 budget of \$384 million, which included funding to consolidate FCC headquarters. At least \$11.8 million of the FY 2017 figure must be used for Office of Inspector General salaries and expenses. The legislation also requires the FCC to complete an impact study of the agency's set top box proposal.
- The FCC issued a [Public Notice](#) on June 16, 2016, establishing a docket to monitor compliance with conditions imposed in the Charter Communications/Time Warner Cable/Bright House Networks merger [Order](#). The conditions imposed include requiring Charter to: offer broadband service at a discounted rate for low-income individuals; expand its broadband network to two million new customer locations; appointment of an independent compliance monitor; file periodic reports to help ensure that the conditions were fulfilled; and prohibiting Charter from imposing data caps or usage-based billing on its customers.
- At the June 10, 2016 Consumer Advisory Committee [meeting](#), the Committee made recommendations on: [criteria](#) for determining adequate substitute services and consumer education related to the impact of replacing legacy copper network services with services based on newer technology, and minimizing disruption in the provision of 911 services; [battery backup community outreach](#) and education during the IP Transition; and [robocalling and federal debt collection](#).
- The FCC issued a [Public Notice](#) on June 14, 2016, announcing the anticipated renewal of its Consumer Advisory Committee and solicited applications for membership on the Committee, subject to

renewal of the Committee's charter. The FCC said it is expected that the two-year membership term on the Committee would commence on October 22, 2016. Applications for membership are due by July 25.

- The Wireline Competition Bureau issued a [Public Notice](#) on June 17, 2016, listing Acknowledgements of Confidentiality filed by parties seeking access to confidential information filed in the special access data collection proceeding since the June 10, 2016 Public Notice. Parties that submitted confidential information in response to the collection have until June 24, 2016, to object to the disclosure of their data and information to any of the parties listed in the attachment to this Public Notice.
- CenturyLink, AT&T, Frontier, FairPoint, Consolidated Communications, and Cincinnati Bell filed a [motion](#) on June 17, 2016, asking the FCC to strike from the record a report prepared by Dr. Mark Rysman and several other analyses based on the original data set in the business data services proceeding. They asserted the report and analyses were based on an irretrievably flawed data set that severely understated cable providers' ability to provision Metro Ethernet, and as a result the report and analyses are thoroughly compromised. They also said given the degree to which these analyses form the basis for the [FNPRM](#), the FCC should rescind applicable portions of that Notice. They asked the FCC to prepare or commission a new analysis reflecting the corrected data set, and allow parties to do the same and put those new proposals and analyses out for comment.
- CenturyLink [met with](#) the FCC's General Counsel and Wireline Competition Bureau staff on June 13, 2016, to discuss business data services issues, including the application of catch-up and going-forward annual productivity factors, cell-site backhaul, and competition. CenturyLink asserted recent data shows in 2013 many cable companies were capable of providing Metro Ethernet service far more broadly than originally thought, and it argued the FCC must take this into account in conducting any competitive market analysis.
- Public Knowledge filed a [letter](#) on June 16, 2016, expressing support for the Verizon/INCOMPAS [proposal](#) for a permanent regulatory framework for the BDS market, so long as the Commission's final rules prevent BDS providers from exerting market power and charging supra-competitive rates and promote technology-neutral competition. PK asserted the FCC's policymaking should be grounded in and guided by key facts and principles, and claimed the Commission's prior efforts to predict future competition and justify deregulation based on potential competition have been a failure. PK recommended the Commission establish a benchmark that reflects competitive market pricing.
- The Wireline Competition Bureau issued a [Public Notice](#) on June 15, 2016, announcing it has granted AT&T's [Application](#) to obtain telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator to provide iVoIP services. This proceeding will be terminated, and the docket will be closed, 60 days from the date of this Public Notice if there are no further filings in this proceeding.
- The Wireline Competition Bureau issued a [Public Notice](#) on June 17, 2016, seeking comment on Manhattan Telecommunications' application to obtain NANP telephone numbers directly from the Numbering Administrators for its iVoIP service. The Bureau said unless otherwise notified by the Commission, MetTel may provide the states in which it intends to request numbers the required 30-day notice on the 31st day after the date of this notice. The Wireline Competition Bureau also issued a [Public Notice](#) seeking comment on Telnix's similar application. Comments are due July 5.
- Neustar filed a [Reply](#) on June 15, 2016, in support of its [Motion](#) for an order to show cause why iconectiv should not be disqualified from serving as the LNP Administrator. Neustar claimed iconectiv does not deny in its [Opposition](#) that it misled the Commission concerning its intentions with regard to the use of non-U.S. citizen personnel in the development of the NPAC, does not deny that it violated the FCC's Selection Order, and does not deny that it failed to disclose the violation until after the NAPM and/or the Commission discovered it.
- The NAPM filed a [letter](#) on June 15, 2016, to urge the FCC to approve the Master Services Agreement between the NAPM and iconectiv and to deny Neustar's [Motion](#) to order iconectiv to show cause why it

should not be disqualified from selection as LNP Administrator. The NAPM claimed Neustar's recent motion is another blatant attempt to delay the transition to a new LNPA. The NAPM asserted Neustar's motion is based on the false presumption that iconectiv has not provided the Commission with an explanation of the relevant facts regarding the writing of the NPAC Code, claiming the Commission has known all of the relevant facts for several months.

- The Wireless Future Program at New America's Open Technology Institute and the LNP Alliance [met with](#) Commissioner Pai's Legal Advisor on June 9, 2016, to discuss their concerns with the LNP Administrator transition, to recommend improvements to the transition, and to urge the FCC to adopt certain revisions to the iconectiv Master Service Agreement. They claimed that the Transition Oversight Manager has not developed or will not share with carriers that are not members of the NAPM a detailed LNPA transition timeline, and said there is no reason to delay the public disclosure of such a timeline until after the MSA is approved. They also urged the Commission to provide a strong endorsement of a neutral and independent NPAC.
- To date, no replies were filed on whether certain docketed Commission proceedings should be terminated as dormant. [Federal Register](#) | [Public Notice](#)
- The Competitive Carriers Association filed [reply comments](#) on June 15, 2016, on competition in the mobile wireless marketplace for the FCC's Nineteenth Annual Report on the State of Competition in Mobile Wireless, including CMRS. CCA asserted the Commission should decline to find effective competition in the CMRS marketplace. [Public Notice](#)

[Back to Highlights](#)

Upcoming Filing Dates

- 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 20 - Comments due on [NPRM](#) on FY 2016 Regulatory Fees. Replies due July 5.
- June 22 - Comments due on the preparation of the biennial report required by the Twenty-First Century Communications and Video Accessibility Act of 2010. [Public Notice](#)
- June 22 - Comments due on Premier Communications and Winnebago Cooperative Telecom Association's [Petition](#) for waiver of the study area boundary freeze. Replies due July 7. [Public Notice](#)
- June 23 - Due date for petitions to suspend or reject tariff filings made on 15 days' notice. Replies due June 27. [Order](#)
- 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 5 - Replies due on [NPRM](#) on FY 2016 Regulatory Fees.
- July 5 - Comments due on the proposed eligible services list for the E-rate program for funding year 2017. Replies due July 20. [Public Notice](#)

- July 5 - Comments are due on [Manhattan Telecommunications'](#) and [Telnyx's](#) applications to obtain NANP telephone numbers directly from the Numbering Administrators for their iVoIP service.
- July 7 - Replies due on Premier Communications and Winnebago Cooperative Telecom Association's [Petition](#) for waiver of the study area boundary freeze. [Public Notice](#)
- 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 18 - PRA comments due on an extension to a currently approved collection associated with Part 52 rules on telephone number portability. [Notice](#)
- July 18 - PRA comments due on an extension to a currently approved collection associated with Part 61 on tariff review plans. [Notice](#)
- July 20 - Replies due on the proposed eligible services list for the E-rate program for funding year 2017. [Public 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.
- July 26 - PRA comments due on new information collections to address the requirements adopted in the March 2016 RoR [USF Reform Order](#). This information collection addresses the new burdens associated with those reforms. [Notice](#)

[Back to Highlights](#)

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