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June 25, 2018 HIGHLIGHTS

- The FCC issued a [tentative agenda](#) for its July 12, 2018 Open Meeting. The FCC will consider six items, including: a [Report and Order](#) that forbears from the dialing parity requirement and amends the N-1 rule to allow for alternative arrangements to facilitate the move toward complete nationwide number portability; and a [Report and Order](#) that consolidates and streamlines the rules governing formal complaint proceedings delegated to the Enforcement Bureau.
- The Senate Commerce, Science, and Transportation Committee [will hold](#) a hearing on June 27, 2018, to consider the nomination of Geoffrey Starks to be an FCC Commissioner.
- [Comments were filed](#) on the [NPRM](#) proposing to allow rate-of-return carriers receiving A-CAM support to voluntarily migrate their lower speed circuit-based business data service offerings to incentive regulation. Replies are due July 2, 2018.
- Verizon filed an [Application for Review](#), asking the Commission vacate the [decision](#) to increase the buffer radius for the MF II challenge process from 250 meters to 400 meters.
- Puerto Rico Telephone filed a [Motion](#) for a 21-day extension of time to file comments and replies on [the NPRM](#) on the Uniendo a Puerto Rico Fund and the Connect USVI Fund.
- NTCA [discussed](#) the need for performance testing obligations that recognize the characteristics of small, rural providers and the impact of compliance testing on network performance.
- [Replies were filed](#) on the [Third FNPRM](#) on rural call completion, which proposed rules to implement the recently enacted Improving Rural Call Quality and Reliability Act of 2017 and sunseting the recording and retention rules upon implementation of the RCC Act.
- NTCA filed [an opposition](#) to USTelecom's [Petition for Stay](#) of the requirements in the Rural Call Completion Order for covered providers to monitor their intermediate providers pending consideration of rules governing performance by intermediate providers.
- USTelecom [modified](#) its UNE transition proposal in its [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs.
- Comments were filed by [AT&T](#), [Verizon](#), [Teliix](#), and [O1 and Peerless Networks](#) on CenturyLink's [Petition](#) for a Declaratory Ruling on end office local switching access reciprocal compensation for over-the-top VoIP. Replies are due July 3, 2018.
- The Consumer and Governmental Affairs Bureau issued a [Public Notice](#) seeking input for a staff report on robocalling. Comments are due July 20, 2018; replies are due August 20, 2018.

Other Key Upcoming Dates

- June 25 - Replies due on the [NPRM](#) on RoR high-cost USF reform. [FR](#)
- June 25 - Petitions due seeking to suspend or reject tariff filings made on 15 days' notice. Replies due June 28, 2018. [Order](#)
- July 2 - Replies due on the [NPRM](#) on BDS regulation for RoR carriers. [FR](#)
- July 3 - Replies due on CenturyLink's [Petition](#) for a Declaratory Ruling on end office local switching access reciprocal compensation. Replies are due July 3, 2018. [Public Notice](#)

USF Reform

- Verizon filed an [Application for Review](#) of the April 30, 2018 [Mobility Fund Challenge Procedures Reconsideration Order](#) on June 21, 2018. Verizon requested the Commission vacate the Wireless Telecommunications and Wireline Competition Bureaus' decision to increase the buffer radius for the MF II challenge process from 250 meters to 400 meters. Verizon asserted the 400 meter buffer radius will allow challengers to successfully challenge a one square kilometer area with as few as two speed test points, arguing this is inconsistent with the Commission's requirement that challengers submit speed tests with "sufficient density to reflect actual consumer experience throughout the entire challenged area." Verizon asserted the revised challenge process could result in widespread false positives, particularly if providers cherry-pick test points with an aim of minimizing actual coverage.
- Puerto Rico Telephone filed [a Motion](#) on June 22, 2018, for an extension of time to file comments and replies on [the NPRM](#) on the Uniendo a Puerto Rico Fund and the Connect USVI Fund. PRTC proposes a 21-day extension of the deadline for filing comments and reply comments, to July 26, 2018 and August 8, 2018, respectively, saying the additional time is necessary due to the complexity of the issues presented by the proposals at a time when affected carriers are engaged in massive post-hurricane restoration efforts.
- NTCA [met with](#) Chairman Pai's Advisor on June 15, 2018, to discuss the need for performance testing obligations that recognize the characteristics of small, rural providers and the impact of compliance testing on network performance, attaching technical papers to demonstrate engineering recognition of the experiences described by NTCA provider members. NTCA explained the need for testing to occur at the actual subscriber location to ensure the service measured is the service the customer receives, and to occur during windows that capture accurately the performance capabilities of the supported network. NTCA also discussed the appropriate network segments that would be subject to performance measurement obligations, explaining that network performance beyond a provider's direct interconnection with an upstream ISP is beyond the provider's control.
- The Rural Electric Cooperatives and Co-Mo Connect [met with](#) Chairman Pai's Advisor on June 15, 2018, to urge the FCC to adopt their performance measures proposal for recipients of CAF support. They asserted the Rural Electric Cooperatives' proposal of requiring providers to meet 90% of the speed and latency requirement at least 95% of the time is fair and prevents unjustly enriching providers that fail to satisfy their CAF public interest obligations. They encouraged the Commission to require testing within the CAF recipient's network; but if the Commission requires measurements be taken from a customer's premise to an Internet Exchange Point, they urged the Commission to include smaller Internet Exchange Points in cities such as Kansas City, Missouri. They also urged the Commission to adopt its original proposal and require speed testing during peak times between 7:00pm and 11:00pm.

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Call Completion

- Replies were filed June 19, 2018, on the [Third FNPRM](#) on rural call completion, which proposed rules to implement the recently enacted Improving Rural Call Quality and Reliability Act of 2017 and sunsetting the recording and retention rules established in the RCC Order upon implementation of the RCC Act. [NTCA](#) said the Commission should broadly define "intermediate provider," and should reject the ITTA and Comcast interpretation that "use" means only that the covered provider must ensure only the first intermediate provider in the call path is registered. It urged the Commission to reject premature proposals to eliminate existing covered provider recordkeeping and retention rules in conjunction with the implementation of the RCC Act, and reject proposals requesting that enforcement of the monitoring requirements for covered providers be delayed. [ITTA](#) supported USTelecom's Petition for Stay of the covered providers' monitoring requirements until the Commission removes the covered provider monitoring requirements entirely, or until it modifies them considerably in conjunction with adopting rules governing intermediate providers and both the modified monitoring requirements and the rules

governing intermediate providers become effective. ITTA said if the Commission, as it should, eliminates the covered provider monitoring requirements altogether, the stay should remain in effect until the covered provider monitoring requirements are removed. [WTA](#) opposed the Commission's proposal to sunset the call data recording and retention rules, saying they should not be eliminated until newly adopted rules show that more calls are successfully being completed. [USTelecom](#) claimed commenters agreed with the issues raised in its comments, including broadly defining intermediate providers, applying uniform standards for covered providers and intermediate providers, implementing the RCC Act only for rural areas, and expeditiously sunsetting the call recording and retention obligations. USTelecom also suggested the Commission ignore calls for additional certifications, and should establish a reasonable timeframe for adjusting contracts. The [South Dakota Telecommunications Association](#) opposed commenters who argued that more specific service quality requirements should not be imposed on intermediate providers, and supported NTCA's position that it is premature to remove the call completion recordkeeping and retention requirements. SDTA argued if no uniform call completion thresholds are established, and at the same time no call completion record-keeping and data requirements are retained, it would seem impossible to even assess whether either covered providers or intermediate providers are discriminating between rural and non-rural areas in violation of the new RCC Act. SDTA urged the Commission to investigate different call completion performance targets or thresholds that may be incorporated into more specific service quality standards for intermediate providers. [All replies available to date.](#)

- NTCA filed [an opposition](#) on June 19, 2018, to USTelecom's [Petition for Stay](#) of the requirements in the Rural Call Completion Order for covered providers to monitor their intermediate providers pending consideration of rules governing performance by intermediate providers. NTCA asserted USTelecom's request fails to satisfy any of the four factors required for a stay, and would harm other interested parties, most notably rural consumers, and thereby unequivocally undermines the public interest. It suggested covered providers can take many reasonable steps to implement their monitoring procedures during the six-month window, even as the standards for intermediate providers are finalized.

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ICC

- Comments were filed June 18, 2018, on CenturyLink's [Petition](#) for a Declaratory Ruling on the applicability of end office local switching access reciprocal compensation, under section 51.913, for traffic that originates from or terminates to an end user customer of an over-the-top VoIP provider that partners with a LEC to exchange traffic to and from the PSTN. [AT&T](#) said all of the relevant precedents from the Commission and the courts, as well as the longstanding terms of CenturyLink's own access tariff, uniformly provide that the core and distinguishing function of an end office switch is the interconnection of calls on trunks to and from last-mile customer loop facilities, and asserted merely transmitting calls for routing over the public internet is not equivalent to interconnection and thus does not involve the same functions as end office switching. AT&T said CenturyLink nevertheless requests the Commission rule that, for LECs and VoIP providers offering "over-the-top" VoIP calling, the 2011 rules should be interpreted to allow end office switching charges. AT&T claimed such a ruling cannot be sustained, and the Commission should instead confirm that the 2011 rules have always prohibited end office switching charges on over-the-top VoIP calls. [Verizon](#) opposed the Petition, saying the Commission should deny CenturyLink's Petition, consistent with its longstanding prohibition against LECs collecting access charges for functions they do not provide. Verizon said beyond that, some competitive LECs are increasingly purchasing toll-free traffic, often fraudulently generated, from over-the-top VoIP providers to exploit the still high originating end office switched access rates, as well as routing IP traffic through multiple CLECs to generate duplicative billing. Verizon claimed the Petition, if granted, would give license to those arbitrage schemes. [Telix](#) supported the Petition, claiming the Commission's VoIP Symmetry Rule and the application of access to OTT VoIP traffic was part of the compromise access reform plan that transformed terminating end office to bill-and-keep while requiring access to be paid on VoIP-PSTN traffic. It also claimed the 2011 Transformation Order does not place any restrictions on business arrangements, such as prohibiting the VoIP provider and its CLEC partner from obtaining wholesale call origination services, such as 8YY origination, from third-party carriers. It

asserted CenturyLink's Petition and accompanying Declaration more than adequately answer the questions raised by the D.C. Circuit Court in its decision vacating and remanding the FCC's 2015 Declaratory Ruling. Comments also filed by: [O1 Communications and Peerless Networks, attachment](#). Replies are due July 3, 2018. [Public Notice](#)

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Broadband

- Commissioner Carr [spoke](#) at the Senate Broadband Caucus, Connecting America Event on June 19, 2018, to discuss the role broadband plays in agriculture and rural communities. Carr said to bring better, faster, and cheaper broadband to more Americans in rural areas the FCC needs to keep cutting the regulatory red tape that drives up the costs of deploying broadband infrastructure. Carr also said the FCC needs to keep freeing up spectrum for next-generation uses and to continue supporting rural broadband providers through programs like the Connect America Fund.
- Commissioner O'Rielly [spoke](#) before the Mackinac Center for Public Policy on June 20, 2018, to discuss broadband and media ownership. He said regulators and some in the media have been fixated on fiber broadband, above consideration of any other technology, saying this view ignores many other consumer broadband access methods and unfairly taints the overall market analysis for related administrative decisions. He noted the FCC's 2018 Broadband Deployment [Report](#) findings that indicated 24 million Americans do not have broadband. He said, however, this number represents those Americans without wired broadband, claiming the real unserved population is 14 million, as 10 million households have satellite broadband of sufficient speed and functionality to meet the FCC's measurements. He also said it is troubling the Commission has been unable or unwilling to recognize mobile broadband as a sufficient substitute to fixed offerings when many use mobile broadband as a replacement for wired broadband.
- USTelecom filed a [letter](#) on June 21, 2018, on its [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. USTelecom modified its transition proposal for unbundled network elements after it had discussions with certain member companies that are major buyers and sellers of unbundled network elements. It said, with the full support of Windstream, USTelecom urges the Commission to grant its forbearance petition and issue an Order that incorporates the modified transition proposal.
- USTelecom filed a redacted version of a [letter](#) on June 18, 2018, detailing the data sources and methodologies used to create Charts 1 through 6 included in USTelecom's [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. USTelecom said although it derived the data series for these charts from publicly available data, including primarily Commission data, the descriptions include proprietary information that reveal sources and methods of analysis used, including limits on the use of the data and analyses. USTelecom said it also filed a confidential version of this submission.
- USTelecom [met with](#) Wireline Competition Bureau staff on June 18, 2018, to discuss its [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. USTelecom said it reviewed prior Commission orders that have found incumbent LECs to be non-dominant across residential and business voice and data services. USTelecom also discussed the impact of the Commission's BDS Order that confirmed the general competitiveness of the market and imposed detailed price regulation in certain limited geographies. USTelecom claimed these orders show the reasons for imposing unbundling obligations have been superseded by marketplace developments recognized in a broad range of Commission orders.
- NTCA [met with](#) Wireless Telecommunications Bureau and Wireline Competition Bureau staff on June 15, 2018, to suggest the FCC work to identify and address barriers to deployment and expansion of broadband facilities of all technologies, rather than approaching infrastructure policy focusing on mutually exclusive wireless or wired challenges. NTCA said railroad crossing fees and fees for access to railroad rights-of-way present a top barrier for small broadband providers, and suggested the

Commission encourage states to utilize Article VI of the BDAC State Model Code that addresses such fees. NTCA expressed support for Commission action to streamline state and local siting procedures and to reduce the costs incurred by providers for access to state and local rights-of-way. NTCA also supported adoption of a deemed granted remedy as applicable to the Commission's section 332 shot clocks, and said fees for applications for and access to public rights-of-way should be cost-based.

- NCTA, Comcast, Charter Communications, and Cox Enterprises [met with](#) Commissioner O'Rielly's Chief of Staff and [with](#) staff from Commissioner Carr's office on June 18 and 20, 2018, to request the Commission take action to prevent state and local governments from imposing duplicative regulations and fees and other regulatory obstacles that have the effect of hindering the deployment of new facilities and services by cable operators. They also [met with](#) Office of General Counsel and Media Bureau staff on June 19, 2018, to discuss similar issues.
- AT&T [met with](#) staff from the Wireless Telecommunication and Wireline Competition Bureaus and Office of the General Counsel on June 19, 2018, to discuss small cell deployments. AT&T discussed: the need for a reduced shot clock for municipal action under section 332; the various types of permitting processes imposed on wireless carriers by municipalities; the FCC's authority under section 253 to require cost-based fees and adopt safe harbor fees for access to the rights-of-way and municipal right-of-way infrastructure; and non-price related barriers to small cell deployments.
- Verizon [met with](#) Legal Advisors to Chairman Pai and Commissioners O'Rielly, Carr, and Rosenworcel on June 19, 2018, to discuss state and local barriers to small cell deployment. Verizon said the Commission should declare that the pole attachment statute requires access to all poles, including light poles, owned by covered utilities. Verizon also expressed support for one-touch make-ready, which would allow attachers, as well as pole owners, the option to use pole-owner-approved contractors to coordinate and do all work to add a new attachment.
- Verizon [met with](#) staff from the Wireless Telecommunications and Wireline Competition Bureaus and the Office of General Counsel on June 20, 2018, to discuss how the Commission can speed wireless broadband deployment by removing impediments to wireless facility siting. Verizon discussed actions the Commission should take to place reasonable limits on state and local governments to promote access to state and local rights-of-way and municipally owned poles and to speed local zoning processes. Verizon said the FCC should clarify that sections 253 and 332(c)(7) bar state or local actions that erect substantial barriers to wireless facilities deployment, and that fees for access to rights-of-way and municipal poles that exceed cost violate sections 253(a) and (c).
- T-Mobile [met with](#) Wireless Telecommunications Bureau, Office of General Counsel, and Wireline Competition Bureau staff on June 14, 2018, to discuss actions the Commission should take to expedite the deployment of new network infrastructure and deliver on the promise of 5G. T-Mobile urged the Commission to: accelerate its section 332 shot clocks; adopt a deemed granted remedy for shot clock violations; and ensure that fees charged by state and local governments are cost-based, nondiscriminatory, and publicly available.
- Sprint [met with](#) Wireless Telecommunications Bureau staff on June 14, 2018, to discuss small cell deployment. Sprint claimed the regulatory and fee demands on small cells from local governments are based on relics of earlier technologies, and said the regulatory process is still premised on the deployment of huge macro towers rather than small deployments of equipment that can fit in a backpack. Sprint said 19 states have enacted legislation to reform the local permitting process related to small cells, suggesting the Commission build on these efforts to ensure all localities across the United States benefit from infrastructure deployment procedures and fees that comport with the Act. Sprint suggested the Commission guarantee access to public rights-of-way under section 253, harmonize costs consistent with section 253, and require government consideration of application timelines under section 332.
- The Wireless Infrastructure Association [met with](#) staff from the Wireless Telecommunications and Wireline Competition Bureaus on June 18, 2018, to discuss barriers to deployment, such as excessive fees that state and local governments impose, examples of municipalities that are not complying with specific shot clock parameters, and any potential costs to state and local authorities that might stem

from the development of such infrastructure. WIA provided examples of state bills and local efforts that have assisted with infrastructure deployment, noting Texas and Colorado enacted legislation that have significantly improved the timing of applications and reduced other significant delays, and said, to date, over 20 states have enacted similar legislation.

- NATOA, the National League of Cities, and the City of Boston [met with](#) staff from the Wireless Telecommunications and Wireline Competition Bureaus and Office of General Counsel on June 19, 2018, to discuss the distinction between permit fees and fees for use of public property, such as poles and rights-of-way. They also discussed the application of section 332(c)(7) to small wireless facilities, the inapplicability of section 253 to such facilities, the need for an updated RF study on small cell deployments, and the expert [reports](#) submitted by the Smart Communities and Special Districts Coalition.

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Universal Service

- The Wireline Competition Bureau issued a [Public Notice](#) on June 18, 2018, to announce the National Lifeline Eligibility Verifier database is now operational in Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming. The Bureau said it is a soft launch and ETCs may begin using the National Verifier for eligibility determinations, but may also continue to use existing eligibility determination processes. It also said during this launch, only ETCs will have access to the National Verifier and consumers will be able to access the National Verifier once the hard launch takes place.
- The Wireline Competition Bureau issued a [Public Notice](#) on June 19, 2018, to provide guidance to ETCs who wish to elect USAC to perform Lifeline recertification for their subscribers in 2019. The Bureau said this guidance, including deadlines, will remain in place for subsequent calendar years unless affirmatively superseded by Bureau or Commission action.
- TracFone Wireless filed a [letter](#) on June 18, 2018, to reiterate its concerns with certain aspects of the National Verifier plan, including refusal to include an Automated Programming Interface for Lifeline service providers to use to make eligibility determinations using the National Verifier. TracFone asserted a well-designed API for use by Lifeline providers will conserve resources of ETCs and the public whose contributions support the USF. TracFone also discussed concerns with the enrollment process and the Spanish language version of the enrollment application.
- TracFone [met with](#) Wireline Competition Bureau staff on June 19, 2018, to discuss steps TracFone believes the Commission should take to strengthen the Lifeline's program integrity while enabling it to meet the telecommunications needs of low-income Americans. TracFone discussed its [proposal](#) for a "conduct-based standard" in lieu of the Commission's proposal to exclude wireless resellers. TracFone also reiterated its concerns about the lack of any application programming interface for the National Verifier, and expressed concern with the length of the Lifeline application and how it could create additional burden on consumers seeking to apply for and receive Lifeline services.
- AT&T [met with](#) Wireline Competition Bureau staff on June 18, 2018, to discuss the [NPRM](#) on rural health care. AT&T said the Commission should adopt a rebuttable presumption that the rates for non-mileage-based telecommunications services between urban and rural areas are reasonably comparable, and suggested the Commission phase out the Telecom Program but continue with the Healthcare Connect Fund program.
- The National Hispanic Media Coalition [met with](#) Commissioner Carr's Policy Advisor on June 13, 2018, to discuss Lifeline and net neutrality issues.

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Misc.

- The FCC issued a [tentative agenda](#) for its July 12, 2018 Open Meeting. The FCC will consider: a [Report and Order](#) that forbears from the dialing parity requirement and amends the N-1 rule to allow for alternative arrangements to facilitate the move toward complete nationwide number portability; a [Report and Order](#) that consolidates and streamlines the rules governing formal complaint proceedings delegated to the Enforcement Bureau; an [Order and NPRM](#) that would continue the Commission's efforts to make mid-band spectrum in the 3.7-4.2 GHz band available for expanded flexible use; a [Report and Order](#) eliminating unnecessary rules that apply to cellular service and other licensees; an [NPRM](#) seeking comment on proposed revisions to the children's television programming rules; and a [Report and Order and FNPRM](#) to improve emergency alerting, including facilitating more effective EAS tests and preventing false alerts.
- The Senate Commerce, Science, and Transportation Committee [announced](#) it will hold a hearing on June 27, 2018, to consider two presidential nominees, Geoffrey Adam Starks to be an FCC Commissioner and Peter Adam Feldman to be a member of the Consumer Product Safety Commission.
- Comments were filed on June 18, 2018, on the [NPRM](#) proposing to allow rate-of-return carriers receiving A-CAM support to voluntarily migrate their lower speed circuit-based business data service offerings to incentive regulation. [NTCA](#) expressed support for the proposal to allow A-CAM carriers to elect incentive regulation for their BDS offerings and suggested the Commission extend this option to RLECs that have elected the Alaska Plan. NTCA said, however, it should not be mandatory for any RLEC and each carrier should have the ability to choose between incentive and price cap regulation of their BDS service. NTCA also encouraged the Commission to adopt the ITTA/USTelecom [proposal](#) for determining whether an electing carrier's BDS service area is competitive. [TDS](#) said there is no reason to create a separate regulatory framework for A-CAM carriers, saying the Commission should extend the BDS framework [adopted](#) in 2017 to A-CAM carriers so the rural businesses and other enterprises they serve may benefit from the increased levels of investment and competition it will produce. [WTA](#) supported ITTA/USTelecom's [proposal](#) that A-CAM and Alaska Plan companies, as well as any other present or future RoR carriers receiving model-based support, be permitted to opt voluntarily into rules substantially the same as those governing the provision of BDS by price cap carriers. WTA also said with respect to TDM channel termination services below 50 Mbps in non-competitive markets, it urged implementation of price cap-like regulation so long as the all-or-nothing rule is waived to limit the price cap treatment to BDS and as long as electing RoR companies remain on their existing terminating switch access and CAF ICC transition path. WTA said with respect to TDM channel termination services below 50 Mbps in competitive markets, it does not object to the use of the existing competitive market test results in counties containing price cap and RoR carriers as a basis for eliminating ex ante pricing regulation. [ITTA and USTelecom](#) urged the Commission to provide model-based RoR carriers the option to have their BDS product offerings regulated in the same manner as those services are regulated for price cap carriers, with some exceptions. They said where the Commission finds that insufficient competition exists, it should adopt the same modified price cap regulations that are in effect for price cap carrier BDS and apply Phase I price flexibility rules to such areas. For NECA pool members, they suggested the going-in rates should be based on the pool rate times a net contribution/recipient factor. They also urged the Commission to forbear from application of its cost assignment rules, including its separation rules, consistent with the forbearance it granted to price cap carriers, and eliminate Part 32 accounting in favor of GAAP accounting. They claimed the rural areas served by price cap carriers are similar in all relevant ways to the rural areas served by model-based RoR carriers, and claimed that conclusion is confirmed by a study conducted by Inteserra Consulting Group, commissioned by Consolidated Communications, and attached to these comments. [AT&T](#) said if the Commission decides to waive the all-or-nothing rule to allow A-CAM carriers to be price cap carriers when providing BDS and remain rate-of-return when providing switched access services, it must ensure that any carriers opting in set their initial price cap rates fairly. AT&T also expressed support for the proposal to grant relief to the A-CAM carriers for their packet-based services and higher-speed TDM products that mirror the regulatory relief the Commission granted the price cap ILECs in the 2007 Forbearance and BDS [Orders](#). [Sprint](#) recommended the Commission initialize rates, allow pricing flexibility, and focus on successfully transitioning all ILECs to incentive regulation, rather than on attempting to implement a competition test for ROR ILECs. Sprint also said the Commission

should not eliminate ex ante regulation of packet-based BDS services and TDM BDS services greater than a DS3. [All comments available to date](#). Replies are due July 2, 2018. [FR](#)

- The Consumer and Governmental Affairs Bureau issued a [Public Notice](#) on June 20, 2018, seeking input for a staff report on robocalling. The Commission [directed](#) the Bureau to prepare a report in consultation with the FTC's Bureau of Consumer Protection. The Bureau seeks data and other information on the progress of robocalling initiatives among government, industry and consumers, and data and other information, including notable trends in illegal robocalling, including for a baseline period of January 2018. The Bureau also seeks information on enforcement and remaining challenges. Comments are due July 20, 2018; replies are due August 20, 2018.
- U.S. Cellular [spoke with](#) Commission staff on June 20, 2018, to update the Commission on the status of U.S. Cellular's efforts to implement SHAKEN/STIR. It stressed that the following critical components are needed for successful implementation of a STIR/SHAKEN solution: a certificate key management entity; new network elements and functionality; new functionality on devices to support SIP parameters; and Volte interoperability (SIP trunking) with other carriers who also have implemented STIR/SHAKEN. U.S. Cellular said based on its current discussions with the vendor community and other carriers, it tentatively plans to deploy a solution during the second half of 2019.
- Starion Energy, a member of the Executive Committee of the Retail Energy Suppliers Association, and Eckert Seamans Cherin & Mellott [met with](#) Consumer and Governmental Affairs Bureau staff on June 19, 2018, to discuss RESA's support for near-term action to halt the blocking and mislabeling of legitimate calls by parties that impede legitimate businesses, like the RESA members, from expanding their business. They suggested the Commission act on the issues of intercept messaging and timelines to unblock blocked calls that were the subject of the 2017 Robocall FNPRM, and establish a "white list" of legitimate callers, prohibit false messages from being sent across the public networks, and make Caller ID mandatory for wireline and wireless networks alike.
- The Consumers Union [spoke with](#) staff from the Consumer and Governmental Affairs Bureau on June 19, 2018, at the National Association of Attorneys General's Summer Meeting in Portland, Oregon, about robocalls. It recommended the FCC require the phone companies to implement advanced call-blocking tools and implement caller ID authentication technology by a date certain, noting its support for the ROBOCOP Act, which would require the implementation of these technologies. It said the FCC should issue the strongest possible rules to protect consumers from unwanted robocalls, and noted its support of several related bills: the HANGUP Act, the Stopping Bad Robocalls Act, and a bill in New York State, the Telephone Consumer Privacy Protection Act.
- The Senate Appropriations Committee approved the [Financial Services and General Government Appropriations Bill](#) on June 21, 2018. The bill contains \$333.1 million for the FCC, which is equal to the FY 2019 budget request.
- Comments were filed on June 21, 2018, on the [NPRM](#) on the assessment and collection of regulatory fees for FY 2018. [CenturyLink](#) supported the FCC's actions to rationalize the terrestrial international bearer circuit regulatory fee regime by including non-common carrier terrestrial IBCs in the regulatory fee methodology. CenturyLink urged the FCC to take additional steps to rationalize that fee category and clarify how it will ensure that it does not over collect for FY 2018. [ACA](#) urged the Commission not to delay assessing an identical rate for DBS and cable television/IPTV providers. [DISH Network and AT&T Services](#) said the proposed increase to the annual per-subscriber regulatory fee imposed on Direct Broadcast Satellite for FY 2018 cannot be justified and would harm consumers. Replies are due July 6, 2018. Comments also filed by: [Astro Digital et al.](#), [Satellite Industry Association](#), and [University Small-Satellite Researchers](#).
- NARUC filed a [letter](#) on June 22, 2018, on the draft [Report and Order](#) on nationwide number portability, which will be considered at the FCC's July 12, 2018 Open Meeting. NARUC suggested that to create that record before taking any final action, the FCC should seek comment on: the costs to consumers to implement NNP; the cost recovery options for NNP implementation; the timeline options for implementing NNP; and the impact of NNP implementation on the IP transition.

- No comments were filed on applications filed by [Terra Nova Telecom](#), [EdgeTel](#), and [Origin Networks, d/b/a Infostructure](#) for authorization to obtain NANP telephone numbers directly from the Numbering Administrators for their iVoIP service.

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Upcoming Filing Dates

- June 25 - Petitions due seeking to suspend or reject tariff filings made on 15 days' notice. Replies due June 28, 2018. [Order](#)
- June 25 - Replies due on the NPRM portion of the March 23, 2018, [Report and Order, Third Order on Reconsideration, and NPRM](#) on high-cost USF rate-of-return reform. [FR](#)
- June 29 - PRA comments due on a revision to a currently approved collection associated with FCC Forms 481, 505, and 525. [Notice](#)
- June 29 - Oppositions due to Petitions for Reconsideration of the March 2018 RoR USF Reform Order have been filed by [Clarity Telecom](#), [Hamilton County Telephone Co-op](#), and [Grand River Mutual Telephone](#). [Public Notice](#) [FR Notice](#)
- June 29 - Comments due on Petitions for ETC designation in New York for the purpose of being able to receive CAF support, filed by [Hughes Network Systems](#) and [OEConnect](#). Replies are due July 9, 2018. [Public Notice](#)
- July 2 - Replies due on the [NPRM](#) proposing ways to ensure that USF support is not used to purchase equipment or services from companies posing a national security threat to the integrity of communications networks or the communications supply chain. [FR](#)
- July 2 - Replies due on the [NPRM](#) proposing to allow rate-of-return carriers receiving A-CAM support to voluntarily migrate their lower speed circuit-based business data service offerings to incentive regulation. [FR](#)
- July 3 - Replies due on CenturyLink's [Petition](#) for a Declaratory Ruling as to the applicability of end office local switching access reciprocal compensation, under section 51.913, for traffic that originates from or terminates to an end user customer of an over-the-top VoIP provider that partners with a LEC to exchange traffic to and from the PSTN. [Public Notice](#)
- July 5 - Comments due on the [NPRM](#) on how best to structure the second stage of the Uniendo a Puerto Rico Fund and Connect USVI Fund. Replies are due July 18, 2018. [FR notice](#)
- July 6 - Replies due on the [NPRM](#) on the assessment and collection of regulatory fees for FY 2018.
- July 9 - Replies due on the [FNPRM](#) on ways to address the problem of unwanted calls to reassigned numbers. [FR](#)
- July 9 - Replies due on Petitions for ETC designation in New York for the purpose of being able to receive CAF support, filed by [Hughes Network Systems](#) and [OEConnect](#). [Public Notice](#)
- July 9 - PRA comments due on a new information collection on Form 683 to collect information from the winning bidders to determine the recipients of CAF Phase II auction support. [notice](#)
- July 12 - PRA comments due on a revision to a currently approved information collection associated with Forms 555, 481, 497, 5629, 5630, and 5631. This revision implements the requirement that ETCs provide written notice to their customers who are currently receiving enhanced support who will no longer be eligible for enhanced Tribal support. [Notice](#)

- July 16 - Comments due on NTTA's [Notice](#) seeking comments on ways to improve the nation's ability to analyze broadband availability, with the intention of identifying gaps in broadband availability that can be used to improve policymaking and inform public investments.
- July 16 - PRA comments due on an extension of a currently approved information collection associated with the selection of USAC Board of Directors and ensuring that requests for review are filed properly with the Commission. [Notice](#)
- July 16 - PRA comments due on an extension of a currently approved information collection related to the FCC's Truth in Billing Format rules in section 64.2401. [FR Notice](#)
- July 18 - Replies due on the [NPRM](#) on how best to structure the second stage of the Uniendo a Puerto Rico Fund and Connect USVI Fund. [FR notice](#)
- July 20 - Comments due on an FCC staff report on robocalling. The Commission seeks data and other information on the progress of robocalling initiatives among government, industry, and consumers, and data and other information, including notable trends in illegal robocalling, including for a baseline period of January 2018. Replies are due August 20, 2018. [Public Notice](#)
- July 23 - PRA comments due on a revision of currently approved information collections associated with rural call completion. [Notice](#)
- July 23 - PRA comments due on an extension of a currently approved information collections associated with FCC Forms 470 and 471. [Notice](#)
- Aug. 6 - Comments due on USTelecom's [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. Replies due September 5, 2018. [Public Notice](#), [Order](#)
- Aug. 20 - Replies due on an FCC staff report on robocalling. The Commission seeks data and other information on the progress of robocalling initiatives among government, industry, and consumers, and data and other information, including notable trends in illegal robocalling, including for a baseline period of January 2018. [Public Notice](#)

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