

NECA's Weekly Federal Regulatory Summary

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July 8, 2019 HIGHLIGHTS

- The FCC released the [agenda](#) for its July 10, 2019 Open Meeting. The FCC will consider eight items, including: [a Report and Order on Remand](#) that would grant price cap carriers relief from ex ante pricing regulation of their lower speed TDM transport BDS nationwide and would partially grant USTelecom's request for forbearance from DS1 and DS3 transport unbundling obligations for price cap carriers; [an NPRM](#) that would propose a connected care pilot; and [an NPRM and Declaratory Ruling](#) to promote facilities-based broadband deployment and competition in multiple tenant environments.
- The FCC placed an Order on [circulation](#) entitled "Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. 160(c) to Accelerate Investment in Broadband and Next-Generation Networks." The Wireline Competition Bureau [granted](#) USTelecom's [request](#) to withdraw all pending requests for forbearance identified in Appendix A of its Petition, with the exception of unbundling obligations for DS1 and DS3 transport and analog voice-grade cooper loops and avoided cost resale.
- Comments [are due](#) July 19, 2019, 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. [Public Notice](#)
- The FCC [extended](#) comment and reply dates on the [NPRM](#) proposing to establish an \$11.42 billion cap on the USF. Comments are now due July 29, 2019; replies due August 26, 2019.
- PRA comments [are due](#) August 1, 2019, on a revision of a currently approved information collection associated with reforms to the USF support mechanisms that were adopted in the [March 2016](#) and [December 2018](#) RoR USF Reform Orders.
- NTCA and Panhandle Telephone Cooperative [discussed](#) the need for greater granularity in the reporting of broadband availability and a validation and challenge process.
- WTA, et al. [discussed](#) A-CAM II location issues and build-out requirements, performance testing requirements for rural telecommunications companies, broadband mapping, and the proposed overall USF cap.
- [Comments were filed](#) on a [petition](#) for rulemaking filed by Central Texas Telephone, et al. urging the FCC to consider adopting rules that prohibit the use of USF funds for special construction of fiber networks that overbuild existing fiber networks. Replies due July 16, 2019. [PN](#)

Other Key Upcoming Dates

- July 10 - Comments [due](#) on Iowa Companies' [Petition for Clarification or Declaratory Ruling](#) on the definition of locations under the A-CAM for residences that also serve as businesses. Replies due July 25, 2019.
- July 16 - Replies due on Central Texas Telephone, et al.'s [Petition](#) for a rulemaking to prohibit the use of USF funds for special construction of fiber networks that overbuild existing fiber networks.

USF Reform

- An FCC [notice](#) was published in the Federal Register on July 5, 2019, seeking comment on the portion of the June 5, 2019 [Public Notice](#) 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 July 19, 2019.
- An FCC [notice](#) was published in the Federal Register on July 2, 2019, seeking Paperwork Reduction Act comments on a revision of a currently approved information collection associated with reforms to the universal service mechanisms that were adopted in the [March 2016](#) and [December 2018](#) RoR USF Reform Orders. PRA comments are due August 1, 2019.
- NTCA and Panhandle Telephone Cooperative [met with](#) Chairman Pai's Special Counsel, Commissioner Carr's Chief of Staff, and Legal Advisors to Commissioners O'Rielly and Starks on June 27, 2019, to discuss broadband availability mapping. PTCI and NTCA said upfront standardization and careful definition are critical to ensuring "apples-to-apples" indications of what providers can truly make available and minimizing the prospect for errors and coverage disputes. They discussed the need for greater granularity in the reporting of broadband availability and said a validation and challenge process remains essential to ensure accuracy before decisions are made with respect to policy or funding.
- WTA, Range Telephone Companies, Shawnee Communications, and Montana Telephone Association [met with](#) Commissioner Carr's Chief of Staff on June 27, 2019, to discuss A-CAM II location issues and build-out requirements, performance testing requirements for rural telecommunications companies, broadband mapping, and the proposed overall USF cap. They expressed concern that the number of locations required to be served as a condition of receiving A-CAM II support appear to be significantly in excess of the actual number of locations on the ground. They said there remain a substantial number of questions regarding the design and implementation of the performance testing regime for rural LECs, including the testing software. They asserted it is unreasonable and inequitable for rural LECs to lose high cost support due to testing failures caused by problems and circumstances that occur outside their networks and over which they have no control.

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ICC

- AT&T filed a [letter](#) on July 2, 2019, to respond to [CenturyLink's filings](#) on CenturyLink's [Petition for Declaratory Ruling](#) on over-the-top VoIP calls. AT&T said the FCC should deny CenturyLink's Petition and confirm that end office switching charges are prohibited on over-the-top VoIP calls. AT&T asserted VoIP-LEC partnerships switch calls to and from the public internet for OTT VoIP calls, not onto subscriber lines, and thus they perform neither interconnection nor the functional equivalent of end office switching.

Broadband

- The Wireline Competition Bureau issued an [Order](#) on July 2, 2019, granting USTelecom's [request](#) to withdraw all pending requests for forbearance identified in Appendix A of its May 3, 2018 Petition for Forbearance, with the exception of: unbundling obligations for DS1 and DS3 transport and analog voice-grade copper loops under section 251(c)(3), and associated section 251 and section 252 obligations; and avoided cost resale obligations under section 251(c)(4) and associated section 251 and section 252 obligations.
- The FCC placed an item on [circulation](#) on July 3, 2019, entitled "Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. 160(c) to Accelerate Investment in Broadband and Next-Generation Networks, WC Docket 18-141; Memorandum Opinion and Order."

- Chairman Pai [spoke at](#) the Development Bank of Latin America workshop on universal service in Córdoba, Argentina on July 4, 2019, on ways the United States is promoting universal internet access. He said the FCC has removed many regulatory barriers to make it cheaper and faster to build infrastructure, including setting a reasonable deadline for cities to rule on siting applications and reasonable limits on siting fees. He also said the FCC's primary tool for connecting these hardest-to-serve areas has been its universal service programs, noting last year, it allocated about \$1.5 billion to connect over 713,000 unserved homes and businesses nationwide using a reverse auction. He also said later this year, the FCC will start the process of setting up a \$20.4 billion broadband expansion program called the Rural Digital Opportunity Fund.
- The FCC issued a [Public Notice](#) on July 1, 2019, announcing that Chairman Pai appointed members to serve on two Broadband Deployment Advisory Committee working groups: the Broadband Infrastructure Deployment Job Skills and Training Opportunities; and the Increasing Broadband Investment in Low-Income Communities. The members of these working groups are listed in Appendix A.
- The FCC issued a [public notice](#) on July 3, 2019, announcing it cancelled the July 17, 2019 tribal workshop that was to be held at the Saginaw Chippewa Indian Tribe's Soaring Eagle Casino and Resort in Mt. Pleasant, Michigan on July 17, 2019. The FCC said it will announce future tribal workshops as plans are finalized.
- USTelecom and representatives of the Broadband Mapping Coalition [met with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on June 27, 2019, to present some additional findings from the Broadband Mapping Initiative pilot project and address the use of shapefiles for FCC Form 477 reporting. They said an initial version of the Broadband Serviceable Location Fabric is completed for Missouri and visual verification and linkage to submitted carrier data is now in process. They asserted preliminary data demonstrates the value of the BSLF process and validates concerns expressed by multiple companies over CAF location mis-counts. They agreed with NTCA that shapefiles is one of several reasonable methods for broadband providers to report their service data, but asserted shapefiles alone do not produce the detailed data the FCC needs to close the digital divide. They urged the FCC to adopt the BSLF, but made three suggestions if the FCC decides to begin by requiring shapefile reporting.
- NCTA, Comcast, Cox, and Charter [met with](#) Advisors to Chairman Pai and Commissioner Rosenworcel on July 2, 2019, to claim there is broad support for their [proposal](#) to reform the Form 477 reporting system to require providers to report broadband availability by submitting polygon shapefiles that represent the geographic area where a provider offers service. NCTA also addressed the relationship between this proposal and the proposal advanced by the Broadband Mapping Consortium to create a broadband location fabric that can be used as a background for displaying broadband availability data. It also expressed concern that waiting for the completion of the location fabric before moving ahead with reforms to the Form 477 reporting requirements would mean that distribution of the Rural Digital Opportunity Fund would either be delayed or hampered by the use of inadequate data. They expressed strong support for the creation of this new funding mechanism on a schedule that would end the CAF Phase II in 2020 as scheduled.
- The Montana Telecommunications Association [met with](#) Advisors to Commissioners Rosenworcel and O'Rielly on June 27, 2019, to discuss future support of broadband investment in rural America. MTA suggested that in structuring the Rural Digital Opportunity Fund, the Commission should take into consideration such factors as a broadband provider's demonstrated track record in meeting quality of service and investment standards in areas served by the provider. It also said while reverse auctions are the most economically efficient mechanism to allocate support, the Commission should recognize that in some cases a reverse auction may not result in optimal investment opportunities with regard to speed, quality of service, and provider track record and qualifications.
- USTelecom, AT&T, CenturyLink, Frontier, and Verizon [met with](#) Legal Advisors to Chairman Pai and Commissioners O'Rielly, Carr, and Starks on June 27, 2019, to discuss their support for the draft [Order](#) on BDS transport and USTelecom's Petition for Forbearance, which will be considered at the July 10, 2019 Open Meeting. They suggested the Commission eliminate the six-month freeze of current market conditions and reduce the transition period from 36 months to 18 months. They also requested a

modification of language in the item that describes a prior filing as late filed and discussed how the Commission could provide clarity regarding the list of wire centers for which the Commission has provided forbearance. A subset of this group also met with Commissioner Rosenworcel's Chief of Staff on June 28, 2019, and USTelecom spoke with Wireline Competition Bureau staff on July 1, 2019.

- USTelecom filed a [letter](#) on July 3, 2019, in response to INCOMPAS' June 28, 2019 [letter](#) on the draft [Order](#) on BDS and USTelecom's Petition for Forbearance. USTelecom said while INCOMPAS argues that the FCC's analysis of competitive fiber locations should exclude any fiber owned by an ILEC's CLEC affiliate within the ILEC's region, USTelecom asserted there is no need for the FCC to carve such fiber routes out from its competitive analysis as any potential competitive harms from such transactions were addressed during the merger approval process. USTelecom said the two transactions highlighted by INCOMPAS were approved after determining that the mergers would not create competitive harms.
- INCOMPAS [met with](#) Chiefs of Staff to Commissioners Rosenworcel and Carr and Legal Advisors to Commissioners O'Rielly and Starks on June 29, 2019, to express support for a Commission denial of USTelecom's Petition for Forbearance for the remaining items, e.g., loops and avoided-cost resale.
- INCOMPAS [spoke with](#) Wireline Competition Bureau staff, Chiefs of Staff to Commissioners Rosenworcel and Carr, and Legal Advisors to Chairman Pai and Commissioners O'Rielly and Starks on June 26 and 27, 2019, to discuss the draft [Order](#) on BDS and USTelecom's Petition for Forbearance. INCOMPAS said paragraph 61 and note 200 of the draft Order appear to make clear that the FCC is not intending, during the three-year transition, to upset pre-existing interconnection agreements or other contractual arrangements. INCOMPAS asserted a three-year transition may be too rapid for small competitive LECs serving more remote areas, suggesting an additional three years of transition be added for areas that are not "urban" as defined in section 54.505(b)(3)(i).
- INCOMPAS filed a [letter](#) on July 3, 2019, to respond to USTelecom, et al.'s [ex parte](#) on the draft [Order](#) on BDS transport and USTelecom's Petition for Forbearance, which will be considered at the July 10, 2019 Open Meeting. INCOMPAS said contrary to USTelecom's assertions, the Commission has no reason to reduce the six-month freeze of current market conditions nor the three-year transition period implemented in the draft Order. INCOMPAS also said the FCC should not change the draft Order's finding that USTelecom's May 6, 2019 filing was late, but it should grant USTelecom's proposed withdrawal of its request for UNE transport forbearance for Tier 3 wire centers.
- INCOMPAS filed a [letter](#) on July 5, 2019, on the draft [Order](#) on BDS transport and USTelecom's Petition for Forbearance and to respond to USTelecom's [ex parte](#) that responded to INCOMPAS' [inquiry](#) as to whether the Office of Economics and Analytics' April Data Tables accounted for intervening acquisitions of CLECs by ILECs. INCOMPAS asserted the integrity of the FCC's competitive test for UNE transport depends on the accuracy of the underlying identification of which wire centers are within a half mile of a competitor's fiber. INCOMPAS claimed USTelecom does not refute the need to ensure that identification has correctly included any CLEC fiber that was not ILEC affiliated at the time of the data collection, but that was subsequently acquired.
- Centurylink filed a [letter](#) on July 1, 2019, in support of USTelecom's Petition for Forbearance. CenturyLink suggested the FCC reject claims made in recent filings by certain CLECs that USTelecom's requested forbearance from section 251(c)(4) resale and voice grade loop unbundling would disrupt their business plans for providing traditional telephone services to business and government customers, and that the elimination of section 251(c)(4) would eliminate a regulatory backstop necessary to protect against abuse of purported ILEC market power. CenturyLink asserted the requested forbearance will not require end user customers to give up traditional TDM telephone services, as the facilities and services underlying those resale- and UNE-based services will remain in place.
- PRTC filed a [letter](#) on July 2, 2019, to respond to Worldnet's [recent letters](#) on the draft [Order](#) on BDS transport and USTelecom's Petition for Forbearance. PRTC claimed WorldNet's arguments on the state of competition in Puerto Rico are not based on facts or data. PRTC supported the proposal in the draft Order to extend to Puerto Rico the partial forbearance from the obligation to unbundle dedicated

transport, and it urged to Commission to include Puerto Rico in any grant of forbearance from the obligation to offer unbundled loops.

- WorldNet Telecommunications filed a redacted version of a [letter](#) on July 1, 2019, in the proceeding addressing USTelecom's Petition for Forbearance. The letter was filed in response to Commission staff inquiries about WorldNet's customer contracts and use of resale, UNEs, and collocation during an ex parte meeting on June 26, 2019.
- TPx filed a [letter](#) on July 2, 2019, to assert footnote 214 in the draft [Order](#) on BDS transport and USTelecom's Petition for Forbearance misconstrues its argument and that it did not intend to imply that the Competitive Market Test adopted by the FCC for BDS relied on competition enabled through unbundled network elements. TPx said its concern is that the FCC looked both to actual and potential competition to provide competitive pressure on deregulated BDS provided by price cap ILECs. TPx said by forbearing from the incumbent LECs' DS1 and DS3 unbundling obligations, the Commission is ending one form of actual competition that keeps ILEC BDS prices in check.

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Universal Service

- The Wireline Competition Bureau issued an [Order](#) on July 5, 2019, extending comment and reply dates on the [NPRM](#) proposing to establish an \$11.42 billion cap on the Universal Service Fund, which is the sum of the authorized budgets for the four USF programs in 2018. Comments are now due July 29, 2019; replies are due August 26, 2019.
- Comments were filed on July 1, 2019, on Central Texas Telephone, et al.'s [Petition](#) for a rulemaking urging the FCC to consider adopting rules that prohibit the use of USF funds for special construction of fiber networks that overbuild existing fiber networks. [NTCA](#) said the current E-rate self-construction and competitive bidding rules contain flaws that can lead to the construction of redundant network facilities rather than using E-rate resources to pay down the cost of obtaining services over connections already funded by the High-Cost USF. NTCA suggested the development of more effective safeguards in the E-rate competitive bidding process would help in heading off such conflict. [WTA](#) supported the Petition, saying the Commission should not encourage the construction of duplicative fiber networks and urged the Commission to release an NPRM that proposes rules requiring additional review and scrutiny of the use of E-Rate funding to overbuild fiber connections previously deployed with federal high-cost support. [USTelecom](#) supported the Petition, saying the Commission should launch a rulemaking proceeding aimed at ensuring that the E-rate program not subsidize fiber buildout projects in areas where fiber already exists – whether built with government subsidies or solely with private investment. [Valley Telephone Coop](#) supported the Petition, saying the FCC should reevaluate portions of its E-rate rules to encourage the most productive use of E-Rate funds while still fulfilling the mission of the program to provide increased access to high-speed internet in the nation's schools, libraries, and rural health care facilities. The [OTA and WITA](#) supported the Petition and urged the Commission to address the use of E-rate funds in the overbuilding of existing fiber networks. They said the goal should be to prohibit such activity and preserve federal resources to the greatest extent possible. [INCOMPAS](#) opposed the Petition, claiming the filing fails to provide sufficient facts and data to justify Commission consideration. INCOMPAS also said changes to the E-rate program's competitive bidding requirements are unnecessary. [All comments available to date.](#) Replies due July 16, 2019. [PN](#)
- The Texas Education Service Centers, the Association of Educational Service Agencies, AASA, and the School Superintendents Association met separately with Advisors to [Chairman Pai](#) and [Commissioner Carr](#) on June 27, 2019, to discuss Central Texas Telephone, et al.'s [Petition](#) for a rulemaking urging the FCC to consider adopting rules that prohibit the use of E-rate funds for special construction of fiber networks that overbuild existing fiber networks. They discussed an overview and summary of recent E-Rate applications on behalf of the three education service centers, and detailed their compliance with E-Rate and Texas state/local procurement rules.
- The Wireline Competition Bureau issued a [Public Notice](#) on July 1, 2019, seeking comments on a [petition](#) filed by CTIA, the National Hispanic Media Coalition, the National Consumer Law Center, et al.,

asking the FCC to pause the December 1, 2019 implementation of two changes to Lifeline that would otherwise take effect: a five-fold increase in the minimum required broadband data usage allowance; and the phase-down in support for voice services. Comments are due July 31, 2019; replies are due August 15, 2019.

- Commissioner Starks' Advisor William Davenport and his legal intern filed an [ex parte notice](#) after meeting with representatives from the University of Pittsburgh, Johns Hopkins University, and the Coalition for Epidemic Preparedness on June 26, 2019, to discuss their study, *The Limitations of Poor Broadband Access for Telemedicine Use in Rural America*. They said the study found while very rural areas would benefit from the use of telemedicine, these areas often lack sufficient broadband coverage to deploy those services and their need for telemedicine is only increasing. They also discussed whether the most efficient approach to a Connected Care Pilot Program would direct support to providers or to patients, and their study's authors emphasized the importance of the FCC coordinating with insurers and other federal agencies to create the best plan moving forward.
- USTelecom, AT&T, CenturyLink, Consolidated, Frontier, Verizon, and Windstream [met with](#) Wireline Competition Bureau staff on July 1, 2019, to discuss implementation of the Lifeline Representative Accountability Database. They asserted USAC's new RAD procedures may require individual employees to provide personally identifiable information to USAC as a condition of their employment to the extent that they interact with the National Verifier database or the National Lifeline Accountability Database and/or are involved in Lifeline subscriber enrollment. They also expressed concern with the process and procedures by which USAC and the Commission arrived at their determination as to who should have to register and what information they are required to provide.
- NARUC [met with](#) Commissioner Rosenworcel's Advisor on July 1, 2019, to discuss Lifeline issues. It said the FCC should: immediately incorporate APIs into the National Lifeline Verifier; maintain support for voice services; work with states to properly launch the National Verifier; ensure that critical state/federal databases for eligibility programs, such as SNAP and Medicaid, are accessible in states where the National Verifier has been launched; and streamline the Lifeline paper application.
- Telzeq Communications filed a [Petition](#) on July 3, 2019, seeking a waiver of USAC's application of section 54.404 to allow Telzeq to receive Lifeline support for its qualified customers due to a case of circumstances beyond Telzeq's control. Telzeq said it had contracted with a consultant to have it enter customer information into the National Lifeline Accountability Database, which it failed to do, resulting in a USAC audit and recovery of Lifeline support for otherwise qualified Lifeline customers.
- OCHIN sent a [letter](#) to Chairman Pai and Commissioners Starks, O'Rielly, Rosenworcel, and Carr on July 1, 2019, to discuss USF contributions and allocation of finances to the four USF programs. OCHIN urged the Commission to ensure balance between the budget and demand for the RHC Program, E-Rate Program, Lifeline Program, and Connect America Fund.
- Petitions were filed on July 1, 2019, by [Electra Telephone](#) and [Tatum Telephone](#) seeking waivers of section 54.313(f)(2)(ii), which requires privately held rate-of-return carriers that are not recipients of loans from the Rural Utilities Service and whose financial statements are audited in the ordinary course of business to file a copy of their audited financial statements with their Form 481. They both indicated they entered into separate stock purchase agreements with Townes Tele-Communications, and said they have yet to receive the necessary documentation from the prior owners to satisfy various financial, audit, and tax reporting obligations. They asked for a 90-day extension of the filing deadline for their Form 481.

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Misc.

- The FCC released the [agenda](#) on July 3, 2019, for its July 10, 2019 Open Meeting. The FCC will consider eight items, including [a report and order on remand](#) that would grant price cap carriers relief from ex ante pricing regulation of their lower speed TDM transport business data services nationwide and partially grant USTelecom's request for forbearance from DS1 and DS3 transport unbundling

obligations for price cap carriers. It will also consider: a [report and order](#) that would increase flexibility for use of 2.5 GHz spectrum for existing educational broadband service licensees and provide opportunities for rural tribal nations and other entities to access unused portions of the band; a [public notice](#) that would establish application and bidding procedures for an incentive auction of upper microwave flexible use service licenses in the upper 37 GHz, 39 GHz and 47 GHz bands; [an NPRM](#) that would propose a connected care pilot; [an NPRM and declaratory ruling](#) to promote facilities-based broadband deployment and competition in multiple tenant environments; a [report and order](#) that would modernize children's TV programming rules and an FNPRM that would seek additional comment on special efforts by broadcasters to produce or support core programming; a [report and order](#) that would modernize the carriage election notice provisions in Part 76 and an FNPRM that would seek comment on applying these new procedures to entities not required to maintain online public inspection files; and [an NPRM](#) that would propose to modernize certain cable and satellite TV provider notice provisions.

- To date no comments were filed on a 214 application filed by InterCarrier Networks and Great Plains Communications requesting consent to transfer control of ICN to GP Communications. [Public Notice](#) Replies are due July 9, 2019.
- In addition to statements carried in a previous edition of *REGScan*, the Rural Wireless Association and CoBank filed statements they made on June 27, 2019 at the FCC [Workshop](#) on Security Vulnerabilities Within Communications Networks: Find It, Fix It, Fund It. [RWA](#) said rural carriers want to safeguard the nation's security and will follow whatever policies Congress, the White House, and the FCC prescribe, but in order to ensure these carriers can continue to serve their current customers and build out service to unserved areas, they will need government assistance. [CoBank](#) said rural operators will be the ones hurt the most by the executive order that will likely soon ban U.S. telecom operators from buying Huawei-made telecom equipment. It said without significant government support, rural America's access to communication services will be damaged. [All statements available to date.](#)
- An FCC [notice](#) was published in the Federal Register on July 2, 2019, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with Form 502, Numbering Resource Optimization. The data collected on Form 502 helps the Commission manage the ten-digit North American Numbering Plan and is used by the FCC, state regulatory commissions, and the NANPA to monitor numbering resource utilization by all carriers using the resource and to project the dates of area code and NANP exhaust. PRA comments are due August 1, 2019.

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Upcoming Filing Dates

- 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 9 - Replies due on a 214 application filed by InterCarrier Networks and Great Plains Communications requesting consent to transfer control of ICN to GP Communications. [Public Notice](#)
- July 10 - Comments due on Northeast Iowa Telephone and Western Iowa Telephone's [Petition for Clarification or Declaratory Ruling](#) on the definition of locations under the A-CAM for residences that also serve as businesses. Reply comments are due July 25, 2019. [Public Notice](#)
- July 12 - Comments due on an application by Pinpoint Holdings and Wyverd Group requesting consent to transfer control of Accipiter Communications d/b/a Zona Communications from Pinpoint Holdings to Wyverd. Replies are due July 19, 2019. [Public 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](#)
- July 19 - Replies due on an application by Pinpoint Holdings and Wyyerd Group requesting consent to transfer control of Accipiter Communications d/b/a Zona Communications from Pinpoint Holdings to Wyyerd. [Public Notice](#)
- July 19 - Comments due 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. [FR Notice](#)
- July 24 - Comments are due on the [FNPRM](#) proposing revisions to FCC rules implementing the Telephone Consumer Protection Act and on issues pertaining to implementation of SHAKEN/STIR. Reply comments are August 23, 2019. [FR](#)
- July 25 - Replies due on Northeast Iowa Telephone and Western Iowa Telephone's [Petition for Clarification or Declaratory Ruling](#) on the definition of locations under the A-CAM for residences that also serve as businesses. [Public Notice](#)
- July 29 - Comments due on the [Notice of Proposed Rulemaking](#) seeking comment on establishing an \$11.42 billion cap on the Universal Service Fund. Replies are due August 26, 2019. [FR](#), [Order](#)
- July 31 - Comments due on a [petition](#) filed by CTIA, the National Hispanic Media Coalition, et al., asking the FCC to pause the December 1, 2019 implementation of two changes to Lifeline that would otherwise take effect: a five-fold increase in the minimum required broadband data usage allowance; and the phase-down in support for voice services. Replies are due August 15, 2019. [Public Notice](#)
- Aug. 1 - PRA comments due on a revision of a currently approved information collection associated with reforms to the universal service mechanisms that were adopted in the [March 2016](#) and [December 2018](#) RoR Reform Orders. [FR Notice](#)
- Aug. 1 - PRA comments due on an extension of a currently approved information collection associated with Form 502, Numbering Resource Optimization. [FR 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](#)
- Aug. 15 - Replies due on a [petition](#) filed by CTIA, the National Hispanic Media Coalition, et al., asking the FCC to pause the December 1, 2019 implementation of two changes to Lifeline that would otherwise take effect: a five-fold increase in the minimum required broadband data usage allowance; and the phase-down in support for voice services. [Public Notice](#)
- Aug. 13 - PRA comments due for information collection requirements for parts of sections 251 and 252 of the Telecommunications Act of 1996 that affect local competition. [FR](#)
- Aug. 23 - Replies are due on the [FNPRM](#) proposing revisions to FCC rules implementing the Telephone Consumer Protection Act and on issues pertaining to implementation of SHAKEN/STIR. [FR](#)
- Aug. 26 - Replies due on the [Notice of Proposed Rulemaking](#) seeking comment on establishing an \$11.42 billion cap on the Universal Service Fund. [FR](#), [Order](#)

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