

## NECA's Weekly Federal Regulatory Summary

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

### July 13, 2020 HIGHLIGHTS

- The FCC issued the [agenda](#) for its July 16, 2020 Open Meeting, and will consider seven items including: [an order and FNPRM](#) on improving broadband mapping data, an [order and FNPRM](#) to combat unwanted and illegal calls, and a [declaratory ruling and FNPRM](#) that would integrate provisions of the Secure Networks Act into its supply chain rulemaking.
- [Comments were filed](#) on the NPRM detariffing telephone access charges. Replies are due August 4, 2020.
- [Comments were filed](#) on the adjustment factor values for the 5G Fund. Replies are due August 6, 2020.
- The House Appropriations Subcommittee on Financial Services and General Government [approved](#) its FY 2021 [funding bill](#) that proposes \$376.1 million for the FCC and includes funding to implement new broadband mapping legislation, as well as \$61 billion for broadband initiatives. The House Appropriations Committee [approved](#) the FY 2021 Agriculture, Rural Development, Food and Drug Administration, and Related Agencies bill that proposes, among other things, \$1.055 billion for broadband deployment.
- Rep. Anna G. Eshoo (D-Calif.) [introduced legislation](#) that instructs the FCC to update the National Broadband Plan. Reps. Tom O'Halloran (R-Ariz.) and Bill Johnson (R-Ohio) [introduced a bill](#) that directs NTIA to work with states, tribes, and the FCC to develop best practices to increase broadband adoption rates.
- NTCA and Vantage Point Solutions [discussed](#) proposed amendments to the draft [order and FNPRM](#) on broadband mapping.
- USTelecom, AT&T, et al. [discussed](#) the draft [order and FNPRM](#) on broadband mapping and suggested the FCC implement the broadband serviceable location database (aka the Fabric) and the new reporting regime.

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### Other Key Upcoming Dates

- July 27 - Replies [due](#) on the 5G Fund [NPRM](#).
- July 27 - Replies [due](#) on refreshing the record on USF contributions on one-way VoIP providers.
- Aug. 4 - Replies [due](#) on the [NPRM](#) on detariffing telephone access charges.

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## USF Reform

- Comments were filed on July 7, 2020, on adjustment factor values for the [5G Fund](#). [NTCA](#) asserted an adjustment factor is unnecessary as part of its proposed “5G Small Carrier Fund” concept to enable a transition of providers receiving legacy support to 5G deployment. [CCA](#) said the creation of new, reliable broadband maps is the fundamental precursor to finalizing other details of the fund distribution, such as the appropriate adjustment factor values. While CCA does not oppose the use of an adjustment factor, it cautions against over-reliance on the adjustment factor compared to accurate, reliable maps. [CTIA](#) said consideration of the specifics of adjustment factors may be premature at this time due to related, yet unresolved, fundamental issues in the 5G Fund proceeding. The [Rural Wireless Association](#) asserted due to the complexity of the modeling, it is unclear how much weight each factor holds in computing the adjustment factor values. It said rural carriers have neither the resources nor time to fully analyze the proposed models and cannot fairly determine if their covered service areas are being disadvantaged by the proposed adjustment factor values. Reply comments are due August 6, 2020. [public notice](#)
- Reply comments were filed on July 7, 2020, on the Connect America Fund Phase II Coalition’s [petition for a waiver](#) of CAF II location adjustment rules. [The CAF II Coalition](#) agreed with USTelecom’s suggestion that, consistent with RDOF requirements, the Commission also afford CAF Phase II recipients two additional years to complete deployment where the number of actual locations at the state level is greater than the Commission’s pre-auction estimate. The CAF II Coalition said this approach would ensure parity and harmonize the two support programs with respect to how the actual number of locations, whether higher or lower than the CAM estimate, are addressed. [public notice](#)
- Premier Communications and Matthey Consulting [spoke with](#) advisors to Chairman Pai, and Commissioners Rosenworcel, Carr, and O’Reilly on July 6 and 8, 2020, regarding Premier’s [petition](#) for clarification or, in the alternative, reconsideration of the [RDOF order](#). Premier said a timely resolution of its petition is necessary for it to adequately budget and plan for future network upgrades, network maintenance and other operational expenses after the end of its CAF Phase II support, and to make decisions on future build-out levels and network design for upcoming, potential auction awards. Premier urged the Commission to clarify that it has not made a final, exhaustive determination of what areas will be eligible in the future RDOF Phase II auction.
- Pacific Network Holdings [spoke with](#) Commissioner Starks’ legal advisor on June 29, 2020, requesting the FCC consider removing the Hawaiian Homelands areas from the preliminary list of areas eligible for the RDOF auction, claiming the reasons given by the Commission will no longer apply by the time the auction takes place.
- The [Town of New Shoreham](#), Rhode Island (Block Island), filed a letter on July 8, 2020, in response to the [public notice](#) announcing an updated list of census blocks that have been deemed initially eligible for the RDOF Phase I auction. Block Island requested the FCC consider reinstating the 250 locations that were no longer considered eligible, claiming Cox Communications provided erroneous information. Block Island claimed Cox has never and does not currently provide any fixed broadband service on Block Island.

[Back to Highlights](#)

## ICC

- The [order on reconsideration](#) that denied Aureon’s [petition for reconsideration](#) of the access arbitrage order was [published](#) in the Federal Register on July 8, 2020. The FCC dismissed Aureon’s petition as procedurally defective, stating Aureon does not identify any material error or omission in the order. The FCC also said contrary to Aureon’s claims, the rules adopted accomplish the FCC’s goals of removing the financial incentives to engage in access arbitrage and reducing the use of intercarrier compensation to provide implicit subsidies to services offered by access stimulating LECs. The order was effective June 11, 2020

- USTelecom [spoke with](#) Chairman Pai's senior counsel and Wireline Competition Bureau staff on July 1, 2020, to urge the Commission to move forward to 8YY reform and adopt its [consensus proposal](#). USTelecom discussed the need for adequate recovery mechanisms to account for the lost implicit subsidies of access charge revenue associated with reform. USTelecom also discussed the NPRM detariffing telephone access charges.
- Ooma filed a [letter](#) on July 7, 2020, urging the Commission to delay any tandem reforms until it can seek comment on and consider the potential impact on IP providers, IP network deployment, and the competitive tandem marketplace. It said should the Commission decide to proceed with reforms, it should at least consider adopting a nationwide average tandem rate that includes usage and connection charges. It asserted by focusing on near-term reforms of tandem rates in advance of other reforms, the FCC risks disrupting the existing competitive market for 8YY services and undermining investment in IP networks used to deliver those services.

## Broadband

- The House Appropriations Subcommittee on Financial Services and General Government [approved](#) its fiscal year 2021 [funding bill](#) by voice vote on July 8, 2020. For fiscal year 2021, the draft bill includes \$24.64 billion in discretionary funding, an increase of \$808 million over the 2020 enacted level. The bill includes \$376.1 million for the FCC, an increase of \$37.1 million above the FY 2020 enacted level, that includes funding to implement new broadband mapping legislation. Additionally, the bill includes \$61 billion in emergency funding for the FCC to expand availability of broadband to unserved areas, as well as multi-year funding for broadband mapping and replacement of telecommunications equipment deemed to pose a national security threat to the United States. The bill goes to the full Committee for markup.
- The House Appropriations Committee [approved](#) the FY 2021 Agriculture, Rural Development, Food and Drug Administration, and Related Agencies bill by voice vote on July 9, 2020. The bill provides over \$4.214 billion for [rural development programs](#), including over \$1.055 billion, an increase of \$435 million above the FY 2020 enacted level, in the expansion of broadband service to provide economic development opportunities and improved education and health care services. This includes \$990 million for the ReConnect program. The House Appropriations Subcommittee on Agriculture, Rural Development, Food and Drug Administration, and Related Agencies [approved](#) by voice vote its [FY 2021 bill](#) on July 6, 2020.
- Rep. Anna G. Eshoo (D-Calif.) [introduced](#) the [National Broadband Plan for the Future Act](#) on July 9, 2020, which instructs the FCC to update the National Broadband Plan to expand internet access across the U.S. and study how the coronavirus pandemic has changed the online lives of Americans.
- Reps. Tom O'Halloran (R-Ariz.) and Bill Johnson (R-Ohio) [introduced](#) a [bill](#) on July 6, 2020, to leverage public-private partnerships to refurbish internet-capable devices for students and underserved families through donation, lending, or low-cost purchasing programs. The bill directs NTIA to work with states, tribes, and the FCC to develop best practices to increase broadband adoption rates among underserved groups, increase awareness about current low-cost broadband programs, and expand technical training programs for individuals to learn how to use internet-capable device.
- Sens. Joe Manchin (D-W.V.) and Susan Collins (R-Maine) [announced](#) on July 8, 2020, they plan to introduce a [bill](#) at the next Senate session, which would create a 2 year, \$160 million hotspot pilot program with a minimum allotment of \$1.6 million per state to allow states, tribes, and territories to purchase and distribute Internet-connected devices to libraries in low-income and rural area.
- NTCA and Vantage Point Solutions [spoke with](#) Wireline Competition Bureau, Office of Economics and Analytics and Rural Broadband Auctions Task Force staff and Commissioner Starks' legal advisor on July 1, 2020, to discuss proposed amendments to the draft [second report and order and third FNPRM](#) on broadband mapping. They asserted, among other things, the draft item's proposals for maximum buffers for reporting wireline broadband service coverage fail to recognize the real world capabilities of

fiber as well as the realities of deploying broadband in rural America. They also [spoke with](#) advisors to Chairman Pai and Commissioner O’Rielly and [Commissioner Carr](#) on July 2 and 8, 2020, and spoke with advisors to [Chairman Pai](#) and [Commissioner Rosenworcel](#) and Wireline Competition Bureau, Wireless Telecommunications Bureau, and Rural Broadband Auctions Task Force [staff](#) on July 9, 2020, regarding proposed changes to the draft [order and FNPRM](#) consistent with those discussed in an earlier [meeting](#) with Wireline Competition Bureau staff.

- NRECA and Vantage Point Solutions [spoke with](#) Chairman Pai’s advisor on July 8, 2020, to express concerns with some aspects of the proposed rules contained in the draft broadband mapping [order and FNPRM](#) that they say fail to recognize the real-world capabilities of fiber as well as the realities of deploying broadband in rural America. They expressed support of NTCA and Vantage Point’s July 6, 2020 [ex parte](#) filing that suggested the 6,600 foot rule in paragraph 17 of the draft order should not be broadened to include FTTP technologies. NRECA and Vantage Point also asserted that in FTTP deployments the length of the drop is not relevant since there is no difference, technology wise, between the main line fiber and fiber drops, and suggested the limit on the length of fiber drops be removed from the draft order.
- USTelecom, AT&T, CenturyLink, Frontier, Consolidated, and Verizon [spoke with](#) advisors to Chairman Pai and Commissioners O’Rielly, Rosenworcel, and Carr on July 7 and 8, 2020, regarding the draft [second report and order and third FNPRM](#) on broadband mapping. They discussed their overall support for the draft item and the Commission moving quickly to implement both the broadband serviceable location database (aka the Fabric) and the new reporting regime. They reiterated their support for the proposed adoption of USTelecom’s [joint proposal](#) with WISPA for fixed wireless reporting and the adoption of the fabric. They also [spoke with](#) advisors to Chairman Pai and Commissioner Starks on July 6, 2020, to discuss same issues.
- Verizon [spoke with](#) Wireline Competition Bureau and Wireless Telecommunications Bureau staff on July 6, 2020, regarding the draft [second report and order and third FNPRM](#) on broadband mapping. It noted that the order does not specify whether broadband providers will be required to submit propagation maps that depict outdoor coverage, as was required by the Mobility Fund Phase II mapping rules, or whether they should instead depict a different type of coverage, such as in-vehicle coverage. It suggested the FCC specify before the initial filing deadline the type of coverage that should be depicted by the propagation maps, and should ensure the verification regime is consistent with the coverage type specified for the maps.
- AT&T [spoke with](#) Wireless Telecommunications Bureau staff on July 8, 2020, regarding the wireless infrastructure information the Commission proposes to collect to verify broadband network coverage maps contained in paragraph 49 of the draft [order and FNPRM](#). AT&T asserted the draft order lists these 15 items for reporting but does not explain how the information will be used to validate propagation maps or why each data element is considered necessary to have on an annual basis.
- CTIA, AT&T, T-Mobile, Verizon and U.S. Cellular [spoke with](#) advisors to Chairman Pai and Commissioners Carr, O’Rielly, Rosenworcel and Starks on July 1, 2 and 6, 2020, to express support for the FCC proposal to implement the Broadband DATA Act’s mobile broadband coverage requirements and improve the collection of mobile wireless broadband deployment data. They expressed concern about the [draft order’s](#) proposal to annually collect highly sensitive infrastructure information as a means to verify the submitted coverage maps, and suggested the Commission seek further comment on the need for such information.
- NCTA, Charter Communications, Comcast, and Cox [spoke with](#) legal advisors to Chairman Pai and Commissioners Rosenworcel, Starks, O’Rielly, and Carr on July 6, 7, and 8, 2020, regarding the draft [second report and order and third FNPRM](#) on broadband mapping. They raised concerns with the Commission’s proposal to adopt maximum buffers for the reporting of wireline broadband service. They said adoption of the one-size-fits-all standard proposed in the draft order will result in less accurate maps that fail to reflect providers’ actual network deployment, and that given the inaccuracies buffers will introduce into the broadband reporting process, the Commission should not impose them on wireline networks. They also asked the Commission to limit the number of times data would need to be resubmitted in response to crowdsourcing information to once in a 30-day period.

- The Utilities Technology Council filed a [letter](#) on July 9, 2020, to request that the Commission revise draft broadband mapping [order](#) regarding maximum buffers for wireline broadband service reporting. The UTC asserted these maximum buffers are not appropriate for fiber to the premise networks in rural unserved areas, and said the FCC should instead increase the maximum buffer distance for fiber to the home technologies to 20-60 kilometers (km) from the aggregation point.
- ACA Connects filed a [letter](#) on July 9, 2020, expressing concern with the draft broadband mapping [order's](#) imposition of maximum buffer distances from existing hybrid fiber-coax and fiber-to-the-premises network facilities for the submission of coverage data by fixed broadband providers. ACA Connects said the proposed one-size-fits-all distance ignores the reality that network architectures and actual deployments differ significantly and are constantly evolving, and will either substantially burden wireline providers, result in the reporting of inaccurate data, or both – or drive inefficient development of future networks.
- GCI Communication [spoke with](#) advisors to Chairman Pai, and Commissioners Carr, Starks, and O’Rielly and Wireless Telecommunications Bureau and the Office of Economics and Analytics staff on July 8 and 9, 2020, regarding the draft broadband mapping [order](#). GCI requested the Commission clarify that when providers transition to the new data collection exclusively, Alaska Plan mobile participants may continue to file their LTE coverage at actual speeds.
- The House Committee on Energy and Commerce held a [hearing](#) on July 8, 2020, entitled, "Addressing the Urgent Needs of Our Tribal Communities. Witnesses included: [Charles Grim, D.D.S., M.H.S.A., Chickasaw Nation Department of Health](#); [Jonathan Nez President of the Navajo Nation](#); [Honorable Christine Sage, Southern Ute Indian Tribe](#); [Fawn Sharp, National Congress of American Indian](#); and [Pilar M. Thomas, Quarles & Brady LLP](#).
- The [NPRM](#) on wireless infrastructure deployment was published in the [Federal Register](#) on July 2, 2020. The NPRM seeks comment on allowing applicants to excavate or deploy wireless facilities outside the boundaries of an existing tower site, among other things. Comments are due July 22, 2020; replies are due August 3, 2020.

[Back to Highlights](#)

## Robocalls

- The U.S. Supreme Court issued an [opinion](#) on July 6, 2020, which invalidated a 2015 exemption to the [1991 Telephone Consumer Protection Act](#) that had allowed robocalls for the collection of government debts. Chairman Pai issued a [statement](#) in support of the decision.
- Reply comments were filed on July 6, 2020, on the [NPRM](#) implementing the TRACED Act’s requirements to further protect consumers from one-ring scams. [Verizon](#) urged the FCC to expand service providers’ existing blocking authority and focus industry efforts to implement STIR/SHAKEN in ways that will benefit consumers and restore trust in caller ID. [CenturyLink](#) asserted a broad safe harbor for call blocking based on reasonable analytics would be useful to help further encourage service providers to block these illegal calls where warranted and protect consumers. It does not support adopting new requirements, claiming they are not likely to be an effective means of mitigating the problem. [Consumer Reports, et al.](#) recommended steps the FCC could take including requiring all voice service providers to provide three levels of call blocking options, requiring all voice service and gateway providers to adopt traceback and know-your-customer procedures, and regularly evaluating providers granted a delay under the TRACED Act. [FR](#)
- Comments were filed on July 10, 2020, on what rules the FCC needs to guide registration of a single consortium to conduct private-led efforts to traceback the origin of illegal robocalls. [NAFCU](#) urged the Commission to seek comment on mechanisms, systems, and structures for identifying legitimate calls and ensuring their uninterrupted connection to consumers concurrently with efforts to seek feedback on prohibiting illegal robocalls. [Consumer Reports, et al.](#) said both voice service and gateway providers

should be required to adopt traceback and know-your-customer procedures. Replies are due July 27, 2020. [FR](#)

- USTelecom [spoke with](#) Chairman Pai's advisor and Consumer and Governmental Affairs staff on July 9, 2020, to suggest a targeted modification to the proposed definition of "effectively mitigate" in the draft call blocking [order](#). It asserted the modified definition would recognize that upstream providers may need to address unusually high volumes of traffic if that is the reason that they have been identified as a bad actor, but that there may also be instances where a bad actor may need to take steps to effectively mitigate their calling practices that are unrelated to unusually high volumes of traffic.
- USTelecom, CTIA and NCTA [spoke with](#) advisors to Chairman Pai and Commissioners O'Rielly, Carr, Rosenworcel and Starks and Consumer and Governmental Affairs staff on July 6 and 7, 2020, to express support for the proposal in the draft [order](#) on call blocking to establish two safe harbors to protect providers' good-faith call-blocking efforts and for the proposed reasonable and flexible protections for legitimate calls. Additionally, they suggested the FCC clarify certain aspects of the draft item.
- The VON Coalition, Google, and RingCentral [spoke with](#) Chairman Pai's advisor and Consumer and Governmental Affairs staff on July 8 and 9, 2020, to recommend the FCC modify the language of the draft [order](#) on call blocking regarding the point of contact for blocking disputes to ensure that a voice service provider is capable of providing a scalable response to blocking disputes both at the consumer-to-provider and provider-to-provider level. They also recommended the Commission allow voice service providers the option to make an electronic form available on their publicly available websites that would allow callers to quickly resolve blocking disputes.
- First Orion filed a [letter](#) on July 9, 2020, on the draft call blocking [order](#). It expressed support for the proposed safe harbors, but claimed a specific timeframe to address blocking disputes is unnecessary and ineffective.
- INCOMPAS, BT Americas and Intrado [spoke with](#) advisors to Chairman Pai and Commissioners O'Rielly and Rosenworcel on July 6 and 7, 2020, regarding the draft [order on call blocking](#). They expressed concern about the potential for widespread blocking under a broader safe harbor. They also suggested modification of the language that clarifies that a voice service provider must be capable of providing a scalable response both at the consumer-to-provider and provider-to-provider levels.
- Securus Technologies filed a [letter](#) on July 8, 2020, on the draft [order](#) on call blocking. It asserted that while it supports efforts by the Commission and industry to target and eliminate unlawful robocalls, it has concerns with the potential for these efforts to result in the erroneous blocking of calls that may inadvertently cause harm to consumer.
- The Professional Association for Customer Engagement [spoke with](#) Consumer and Governmental Affairs Bureau staff on July 8, 2020, regarding the draft [order on call blocking](#). PACE expressed concern with the proposal to provide a call blocking safe harbor to voice service providers that block fully attested calls using reasonable analytics. PACE suggested the Commission modify the order to allow service providers to block fully attested calls only after conducting a reasonable investigation to determine that the calls are illegal or unwanted.
- The American Bankers Association, et al. [spoke with](#) advisors to Chairman Pai and Commissioner O'Rielly on June 30 and July 2, 2020, regarding the draft call blocking [order and NPRM](#). They expressed support for elimination of illegal automated calls and made a number of suggestions they said would strengthen protections for both consumers and callers. They also proposed revisions to paragraphs 54 and 58 of the draft order and draft rule 64.1200(d)(3) and (8). They also spoke with [spoke with](#) advisors to Commissioners Carr, Rosenworcel, Starks and O'Rielly on July 7 and 9, 2020, to discuss the same issues.

## Other Universal Service

- Comments are due July 13, 2020, on refreshing the record in its 2012 USF contribution methodology [FNPRM](#) regarding one-way VoIP providers. Replies are due July 27, 2020. [public notice](#)
- NARUC released [draft resolutions](#) for its 2020 summer policy summit on July 20, 2020. A telecommunications-related resolution urges Congress to decline to pass a House bill that eliminates the state ETC designation role. The resolution also asks Congress to amend [H.R. 7302](#), which proposes a broadband Lifeline fund, to require providers also be designated as ETCs and urges the FCC to continue to cooperate with the states and acknowledge the states' significant role in closing the digital divide.
- The FCC [announced](#) on July 8, 2020, it has approved a final set of COVID-19 telehealth program applications in the amount of \$10.73 million for providers in Illinois, Alabama, California, Massachusetts, West Virginia, North Dakota, Oregon, Washington, Wyoming, Connecticut, Guam, Maryland, New York, Mississippi, Pennsylvania, Georgia, Colorado, Minnesota, Texas, Rhode Island, and Delaware. The FCC said it has approved 539 funding applications in 47 states plus Washington, D.C. and Guam for a total of \$200 million in funding, provided in the CARES Act. Commissioner Carr issued a [statement](#).
- An FCC [notice](#) was published in the Federal Register on July 13, 2020, announcing the Office of Management and Budget has approved for a period of three years, a revision to an information collection associated contained in the [November 2019 order](#) on Lifeline reform. The amendments to amendatory instructions 6.b. (§ 54.404(b)(12))(National Lifeline Accountability Database) and 11 (§54.410(f))(subscriber eligibility determination and certification) are effective October 13, 2020.
- The National Lifeline Association [met with](#) Wireline Competition Bureau staff on July 2, 2020, to discuss waivers of certain Lifeline rules due to the COVID-19 pandemic, the waiver of Lifeline mobile broadband minimum standards, and its [petition](#) seeking a declaratory ruling revoking its approval of the national Lifeline accountability database opt-out certification of the Texas PUC.
- The [Texas PUC](#) filed comments on July 9, 2020, on the National Lifeline Association's [petition](#) for a declaratory ruling revoking the Texas PUC's National Lifeline Accountability Database opt-out certification and providing other relief. The PUCT urged the Commission to deny the petition and said NaLA chose to seek revocation of the PUCT's NLAD opt-out certification, rather than first attempting to work cooperatively with the PUCT to resolve their concerns. Replies are due July 27, 2020. [public notice](#)
- TAG Mobile filed a [letter](#) on July 9, 2020, to express support for National Lifeline Association's [petition](#) seeking a declaratory ruling revoking its approval of the national Lifeline accountability database opt-out certification of the Texas PUC.
- TruConnect [spoke with](#) Commissioner Carr's legal advisor on July 2, 2020, to offer recommendations on the Lifeline program to help the FCC meet the needs of Americans impacted by the pandemic. It also discussed its revised amended petition for ETC designation.
- The Enforcement Bureau issued two notices of apparent liability on July 6, 2020, to [Compu-Phone Voice & Data](#) and [Blue Casa Telephone](#), proposing penalties of \$75,000 to each for their apparent failure to cooperate with USAC's verification functions relating to the retention and provision of records that justify financial and other information reported in their 2019 Telecommunications Reporting Worksheet.
- The Wireline Competition Bureau issued a [public notice](#) on July 6, 2020, to announce it has directed USAC to fully fund eligible Category One and Two E-rate requests using the \$500 million in E-rate funds unused from previous years, and any additional funds needed under the current cap to fully meet demand for such services.

- The Puerto Rico Hospital Association filed a [letter](#) on July 7, 2020, to express support for Blackburn Technologies' [petition for waiver](#) of section 54.1505(a) (stage 2 fixed support application process). The [Puerto Rico Public Service Regulatory Board](#), [BBR IT Synergy](#) and [gigifi](#) also filed letters on July 10, 2020, to express support for Blackburn Technologies' [petition](#) for waiver.
- Comments are due July 13, 2020 on Blackburn Technologies II's [petition](#) for a waiver of section 54.1505(a) (stage 2 fixed support application process). [public notice](#)

[Back to Highlights](#)

## Misc.

- The FCC issued the [agenda](#) on July 9, 2020, for its July 16, 2020 Open Meeting. The FCC will consider a [second report and order and third FNPRM](#) that would establish requirements to ensure that the Commission collects accurate and granular data on the availability of broadband service through the Digital Opportunity Data Collection, and would seek comment on additional measures to implement the requirements of the Broadband DATA Act. The FCC will also consider: [a third report and order, order on reconsideration, and fourth FNPRM](#) to combat unwanted and illegal calls and implement portions of the TRACED Act; a [declaratory ruling and second FNPRM](#) that would integrate provisions of the Secure and Trusted Communications Networks Act of 2019 into its existing supply chain rulemaking proceeding; a [report and order](#) that would designate 988 as the 3-digit number for the National Suicide Prevention Lifeline; a [sixth report and order and order on reconsideration](#) to further improve vertical (or Z-Axis) location accuracy for wireless 911 calls; an [NPRM](#) that would ensure that priority service programs operate effectively for emergency workers as technology evolves; and a [second report and order](#) that would modernize the leased access rate formula by adopting a tier-based calculation.
- Comments were filed on July 6, 2020, on the [NPRM](#) on detariffing telephone access charges. [NTCA](#) suggested the FCC decline to mandate detariffing of subscriber line charges and access recovery charges for RLECs, and instead grant operators interested in obtaining greater flexibility in recovering their costs an opportunity to do so through a permissive detariffing regime. NTCA said a mandatory nationwide detariffing of access charges introduces unnecessary complexity for RLECs, creates regulatory uncertainty and risks RLECs' ability to recover interstate costs. [WTA](#) urged the FCC to adopt a more flexible permissive detariffing of TACs rather than mandatory nationwide detariffing. WTA said mandatory TAC detariffing and consolidation of SLC and ARC charges into basic local service rates will be subject to intrastate regulations and restrictions in at least one-third of the states, and detariffing of TACs will reallocate up to \$290 million of currently interstate SLC and ARC revenues in a manner that will unpredictably impact federal and state universal service support mechanisms. The [Concerned Rural LECs](#) said the FCC should not mandate the deregulation and detariffing of TACs, claiming doing so could cause significant problems for many RoR ILECs and have implications on contributions to both federal and state universal service funds. They said the Commission should make the deregulation and detariffing of TACs optional and provide flexibility in the timing of the effective date for carriers that elect it. Reply comments are due August 4, 2020. [all comments available | FR](#)
- NTIA [announced](#) on July 8, 2020, the [establishment](#) of the Communications Supply Chain Risk Information Partnership (C-SCRIP) in support of the requirements of section 8 of the Secure Networks Act of 2019. The act directs NTIA, in cooperation with other designated federal agencies, to establish a program to share supply chain security risk information with trusted providers of advanced communications service and suppliers of communications equipment or services.
- Briefs were filed with the U.S. Court for Appeals for the Fifth Circuit in the case addressing Huawei's [petition for review](#) of the Commission's supply chain [order](#). [Huawei](#) filed its reply brief and argued the FCC lacks authority for the USF rule, which it said only directs the FCC to use USF funds to expand access to telecommunications in rural an underserved communities, but not to make national security determinations. The [FCC](#) filed its final brief and argued it does have the authority to prohibit the use of USF funds for services and equipment from companies that pose a threat to the security of the nation's communications networks.

- USTelecom [spoke with](#) advisors to Chairman Pai and Commissioners O’Rielly and Carr on July 9, 2020, regarding the [draft declaratory ruling](#) on supply chain. USTelecom claimed the information collection Congress required the Commission to conduct under the Secure Networks Act supersedes the Commission’s [information collection](#). It said to gain clarity on this issue, it suggested the Commission add additional questions to the NPRM to seek comment on the interplay between the Commission’s [information collection](#) and the information collection required under the Act.
- Huawei filed an [ex parte](#) on July 8, 2020, to state the FCC should not adopt the draft [declaratory ruling](#) on supply chain. Huawei claimed the Supply Chain Order cannot fulfill any obligation imposed by the Secure Networks Act because the [Supply Chain Order](#) was unlawful and invalid.
- NetNumber [spoke with](#) Chairman Pai’s legal advisor and intern and Wireline Competition Bureau staff on July 6, 2020, to urge the FCC to adopt the [final rules](#) implementing the Secure Networks Act as soon as possible. It also urged the FCC to combine the proposed data collection from voice service providers described in paragraphs 51-55 of the [draft item](#) with a data collection from vendors that match the functionalities of their equipment and services with those in the covered list. It also [spoke with](#) advisors to Commissioners Rosenworcel, Starks and O’Rielly to discuss the same issues.
- The Wireline Competition Bureau issued a [public notice](#) on July 9, 2020, granting a section 214 application filed by Citizens Communications, Citizens Telephone Company of Higginsville, Missouri, Citizens Long Distance Company and Green Hills Telephone, requesting consent to transfer control of CTC and CLD to Green Hills.
- The Wireline Competition Bureau issued a [public notice](#) on July 6, 2020, seeking comment on a section 214 application by Chad Miles and Great Plains Communications, requesting consent to transfer control of Miles Enterprises and its regulated subsidiaries, Miles Communications, Sunman Telecommunications and Sunman Telecommunications Long Distance, from Chad Miles to GP Communications. Comments are due July 20, 2020; reply comments are due July 27, 2020.
- The FCC issued a [notice of proposed rulemaking](#) on July 9, 2020, seeking comment on updating its ex parte rules. The FCC seeks comment on several aspects of its rules, including a proposal to exempt from the rules, in certain proceedings, government-to-government consultations between the Commission and federally recognized tribal Nations and a proposal to require that all written ex parte presentations and written summaries of oral ex parte presentations be submitted before the Sunshine period begins. Comments are due 30 days after publication in the Federal Register; replies are due 45 days after publication.
- The Wireline Competition Bureau issued a [public notice](#) on July 6, 2020, granting RadiantIQ’s application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service.
- The FCC issued a [public notice](#) on July 7, 2020, to announce the anticipated renewal of the Consumer Advisory Committee and solicit nominations for membership. Nominations are due on August 7, 2020, and should be submitted via an [online nomination form](#).
- Chairman Pai [announced](#) on July 6, 2020, Ashley Boizelle will serve as acting general counsel for the FCC from July 13 to September 4, 2020, while General Counsel Thomas M. Johnson, Jr., is on paternity leave.
- The FCC issued a [public notice](#) on July 7, 2020, to announce the permanent closure of its filing window at FCC headquarters, effective July 7, 2020. Hand-carried documents are to be filed at the Commission office in Annapolis Junction, Maryland. After COVID-19 restrictions are lifted the filing window for hand-carried documents will be open from 8 a.m. to 4 p.m., Monday through Friday.
- The Consumer and Governmental Affairs Bureau issued an [order](#) on July 9, 2020, addressing a slamming complaint against American Telecommunications Systems. The Bureau found ATS responded to the complaint and has taken action to resolve the complaint.

[Back to Highlights](#)

## Upcoming Filing Dates

- July 16 - PRA comments due on a revision of a currently approved information collection on tariff review plans. [Federal Register](#)
- July 20 - Comments due on a section 214 application requesting consent to transfer control of Miles Enterprises and its regulated subsidiaries to Great Plains Communications. Replies are due July 27, 2020. [public notice](#)
- July 22 - PRA comments due on a revision of a currently approved collection on FCC Form 683, application for CAF Phase II and RDOF auction support. [notice](#)
- July 22 - Comments due on the [NPRM](#) on wireless infrastructure deployment. Replies are due August 3, 2020. [FR](#)
- July 24 - Comments due on a [petition](#) for rulemaking and declaratory ruling filed by CTIA and USTelecom to simplify filing requirements for *pro forma* assignment and transfer of control applications. Replies are due August 10, 2020. [public notice](#)
- July 27 - Replies due on the 5G Fund [NPRM](#). [FR](#)
- July 27 - Replies due on a section 214 application requesting consent to transfer control of Miles Enterprises and its regulated subsidiaries to Great Plains Communications. [public notice](#)
- July 27 - Replies due on the [NPRM](#) on what rules the FCC needs to guide registration of a single consortium to conduct private-led efforts to traceback the origin of illegal robocalls. [FR](#)
- July 27 - Replies due on the National Lifeline Association's [petition](#) for a declaratory ruling revoking the Texas PUC's National Lifeline Accountability Database opt-out certification and providing other relief. [public notice](#)
- July 27 - Replies due on refreshing the record in its 2012 USF contribution methodology [FNPRM](#) regarding one-way VoIP providers. [public notice](#)
- July 29 - Comments due on iconectiv's [petition](#) asking the Commission to conduct a competitive procurement process to select the toll-free numbering administrator. Replies are due August 13, 2020 [public notice](#)
- Aug. 3 - PRA comments due on a new information collection on Alaska Plan end of term commitments. [FR](#)
- Aug. 3 - Replies due on the [NPRM](#) on wireless infrastructure deployment. [FR](#)
- Aug. 4 - Replies due on the [NPRM](#) on detariffing telephone access charges. [FR](#)
- Aug. 5 - Comments due on whether 515 proceedings should be terminated as dormant. Replies due August 20, 2020. [public notice](#) | [Federal Register](#)
- Aug. 6 - Reply comments due on the [public notice](#) seeking comment on adjustment factor values for the [5G Fund](#).
- Aug. 10 - Reply comments due a [petition](#) for rulemaking and declaratory ruling filed by CTIA and USTelecom to simplify filing requirements for *pro forma* assignment and transfer of control applications. [public notice](#)

- Aug. 13 - Replies due on iconectiv's [petition](#) asking the Commission to conduct a competitive procurement process to select the toll-free numbering administrator. [public notice](#)
- Aug. 17 - PRA comments due on extension of a currently approved collection associated with Part 59 infrastructure sharing. [notice](#)
- Aug 17 - PRA comments due on a revised information collection relating to the COVID-19 [telehealth order](#) (FCC Forms 460, 461, 462 and 463). [notice](#)
- Aug. 20 - Replies due on whether the 515 proceedings should be terminated as dormant. [public notice](#) | [FR](#)
- Aug. 31 - PRA comments due on a new information collection on the CAF II eligible locations adjustment process. [notice](#)
- Sept. 4 - PRA comments due on an extension of a currently approved information collection associated with FCC Forms 499-A and 499-Q, annual and quarterly telecommunications reporting worksheets. [FCC notice](#)

[Back to Highlights](#)

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