

**NECA's Weekly Federal Regulatory Summary**

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**July 15, 2019 HIGHLIGHTS**

- The FCC adopted eight items at its July 10, 2019 [Open Meeting](#), including: [a report and order on remand](#) granting price cap carriers relief from ex ante pricing regulation of their lower speed TDM transport business data services nationwide and partially granting USTelecom's request for forbearance from DS1 and DS3 transport unbundling obligations for price cap carriers; an [NPRM](#) proposing a connected care pilot; and an [NPRM and declaratory ruling](#) promoting facilities-based broadband deployment and competition in multiple tenant environments.
- The FCC issued a [tentative agenda](#) for its August 1, 2019 Open Meeting. The FCC will consider nine items, including: an [NPRM](#) proposing to establish a new Rural Digital Opportunity Fund that would distribute \$20.4 billion in high-cost USF support over 10 years using a two-phase reverse auction framework; a [report and order and second FNPRM](#) that would establish a new Digital Opportunity Data Collection to collect geospatial broadband coverage data from fixed providers, adopt a "crowdsourcing" process on the accuracy of the maps, and make targeted changes to the existing Form 477 to reduce filing burdens; and a [report and order](#) that would overhaul the Rural Health Care Program by streamlining and simplifying the way health care providers apply for and calculate USF support amounts.
- The Wireline Competition Bureau issued a [Public Notice](#) on July 12, 2019, to provide guidance regarding calculation of final deployment obligations for A-CAM I and A-CAM II and the application of the support recovery rules in the event that a carrier does not meet its final deployment obligations.
- The Wireline Competition Bureau [opened](#) WC Docket No. 19-195, Digital Opportunity Data Collection.
- [Comments were filed](#) 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. Reply comments are due July 25, 2019. [Public Notice](#)
- NTCA filed a [letter](#) on measures to address the potential for increasing standalone broadband conversions to reintroduce the effects of the USF budget control mechanism.
- WTA, NortheastTel, et al. [discussed](#) performance testing requirements for rural LECs, and said there remain a number of issues and questions regarding the design and implementation of the ultimate performance testing regime for rural LECs.
- The FCC [held](#) a summit on implementation of the SHAKEN/STIR caller ID authentication framework. Chairman Pai issued a [statement](#) on the [summit](#). Pai also [proposed](#) adoption of new rules banning malicious caller ID spoofing of text messages and international calls, which will be voted on at the August Open Meeting. [Carriers responded](#) to [letters](#) from Commissioner Starks on robocalls.
- Fourteen Members of Congress sent a [letter](#) to the FCC Commissioners urging them not to establish an overall cap for the Universal Service Fund or combine the cap of any of the USF programs.
- NECA and NTCA filed a [motion](#) with the D.C. Circuit Court of Appeals to file an amicus brief in support of the FCC in the case [appealing](#) the FCC's [Order](#) that extended the separations freeze.

**Other Key Upcoming Dates**

- 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.
- July 19 - Comments [due](#) on A-CAM location adjustments. [FR Notice](#)
- July 25 - Replies [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.
- July 29 - Comments due on the [NPRM](#) on establishing a cap on the USF. Replies due August 26, 2019. [Order](#)  
Editor: [Teresa Evert](#) | Assistant Editor: [Shawn O'Brien](#)

## USF Reform

- The Wireline Competition Bureau issued a [Public Notice](#) on July 12, 2019, to provide guidance and illustrative examples regarding calculation of final deployment obligations associated with A-CAM I and A-CAM II and the application of the Commission's support recovery rules in the event that a carrier does not meet its final deployment obligations. This guidance responds to questions from members of the public about the Commission's rules.
- Comments were filed on July 10, 2019, 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. Petitioners asserted guidance issued by USAC on location reporting contradicts the 2016 RoR Reform Order, the 2018 RoR USF Reform Order, and the Wireline Competition Bureau's Guidance on location reporting. [NTCA](#) said USAC's guidance, if enforced as written, could result in many locations critical for precision agriculture and other agribusiness applications being discounted or disregarded altogether when determining what kinds of locations need broadband. NTCA suggested the FCC direct USAC to modify the FAQ to strike a balance between accountability and flexibility that reflects rural realities and is consistent with the FCC's rules and orders. [WTA](#) supported the petition and said the FCC should reiterate that its policies and procedures allow high-cost support recipients to count residential and business locations toward satisfaction of their build-out obligations if they construct facilities close enough to offer qualifying broadband service to such locations and can provide actual service to the locations within 10 business days of a customer request. WTA said the FCC should order USAC to revise its subject FAQ accordingly. [ITTA](#) agreed with petitioners that the USAC guidance is over inclusive, noting the FCC has maintained that broadband service is available, i.e., the location counts towards fulfillment of deployment obligations, if the carrier could provide qualifying broadband service to the location within 10 business days upon request. ITTA said requiring that the business already have separately subscribed customers in order to be counted separately from the residence goes far beyond the FCC's broadband service availability definition. [The Iowa Communications Alliance, et al.](#) said the recommendations by the petitioners would strike a proper balance by properly recognizing the diversity of rural locations that may share a structure or a property parcel with a residence, while also maintaining reasonable standards for what qualifies and mitigating against gamesmanship in the identification of locations. Reply comments are due July 25, 2019. [All comments available to date.](#) [Public Notice](#)
- [Miller Telephone](#) and [Red River Communications](#) filed Petitions on July 11, 2019, seeking waivers of the election deadline for A-CAM II and requesting revised A-CAM II offers. Miller said its study area is almost completely ineligible for A-CAM II support, except for six locations, due to an unsubsidized fixed wireless provider erroneously over-reporting its service footprint and its speeds on the Form 477. Miller asked the Bureau to recalculate its A-CAM II support offer with the fixed wireless provider removed from consideration as an unsubsidized competitor, and asked for an extension of the July 17, 2019 deadline for submitting A-CAM II election notices until the WCB can consider the evidence submitted in this petition and recalculate the offer. Red River said a significant portion of its study area is ineligible for A-CAM II support due to an adjacent ILEC broadband provider submitting incorrect data on its December 31, 2017 Form 477 and overreporting its fiber-to-the-home broadband. Red River urged the WCB to recalculate its A-CAM II support offer with the municipal ILEC broadband provider removed from consideration as an unsubsidized competitor and to extend the July 17, 2019 deadline for submitting A-CAM II election notices.
- Miller Telephone [spoke by phone](#) with Wireline Competition Bureau staff on July 10, 2019, to discuss the negative ramifications to Miller's future USF support of a fixed wireless provider that it claimed has overstated and misrepresented its broadband availability on its Form 477 to the extent that it appears there is a competitive overlap of nearly 100% of Miller's very rural study area in Missouri. Miller said by reviewing the pricing information provided on the fixed wireless provider's own website, it is obvious the provider does not meet the FCC's service obligation standards. It urged the FCC not to rely solely on flawed Form 477 data when making critical decisions regarding vital USF funding in either the context of A-CAM II or legacy support and suggested the FCC always ensure a robust challenge process is undertaken.

- NTCA filed a [letter](#) on July 11, 2019, as a follow up to a prior meeting with Chairman Pai's Special Counsel on measures to address the potential for increasing standalone broadband conversions to reintroduce the effects of the USF budget control mechanism. NTCA said in the absence of some measure to address potential changes and spikes in USF support only during this transitional period, there is a risk that the budget control mechanism could be retriggered and once again generate unpredictability in support levels among smaller rural operators. NTCA submitted analyses depicting, subject to stated assumptions, what such renewed and increased budget controls could look like if standalone broadband conversions were to increase at various paces. NTCA urged the Commission to consider a transitional measure to mitigate, if not eliminate, such concerns.
- WTA, NortheastTel, Shawnee Communications, and Total Telecommunications spoke with [Commissioner O'Rielly's](#) Advisor and [Wireline Competition Bureau and Office of Economics and Analytics](#) staff on July 8, 2019, to discuss performance testing requirements for rural LECs. WTA, et al. said they do not oppose testing requirements, but noted there remain a substantial number of issues and questions regarding the design and implementation of the ultimate performance testing regime for rural LECs. They asserted the testing software solutions being developed by various vendors are not likely to be as easy and inexpensive to implement as the Commission is being told. They also said it is unreasonable and inequitable for rural LECs to lose critically needed 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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## Broadband

- The FCC issued a [Public Notice](#) on July 11, 2019, announcing the Wireline Competition Bureau, in coordination with the Wireless Telecommunications and International Bureaus and the Office of Economics and Analytics, opened WC Docket No. 19-195, captioned "Digital Opportunity Data Collection." All filings related to the Digital Opportunity Data Collection should be submitted in WC Docket No. 19-195.
- Sens. Chuck Grassley (R-Iowa) and Joni Ernst (R-Iowa) sent a [letter](#) to Chairman Pai on July 8, 2019, to emphasize it is critical for broadband maps to be improved so public and private partners have access to the accurate data needed to bridge the digital divide. They also said it is critical to ensure inaccurate information will not result in a denial of access to fixed or mobile broadband and a validated set of data based upon standardized methods of granular reporting will be essential to ensure that funding is available throughout rural America. [Press release](#)
- Reps. Ro Khanna (D-Calif.), Brian Fitzpatrick (R-Penn.), Anna Eshoo (D-Calif.), Peter Welch (D-Vt.), and Yvette Clarke (D-N.Y.) [announced](#) they introduced a bill entitled *Measuring the Economic Impact of Broadband Act* on July 10, 2019. The bill would require the FCC's Bureau of Economic Analysis to conduct a study of the effects of broadband deployment and adoption on the U.S. economy. The Senate [companion bill](#) is led by Sens. Amy Klobuchar (D-Minn.) and Shelley Moore Capito (R-W.V.).
- The FCC's Office of Economics and Analytics released a [paper](#) entitled "An Empirical Analysis of Broadband Access in Residential Multi-Tenant Environments" on July 8, 2019. The OEA found residential occupants of MTEs are on average slightly less likely to obtain a wireline broadband subscription than residential occupants of non-MTEs. The OEA also found that the presence of a mandatory access law is on average associated with a higher rate of terrestrial fixed broadband subscription for residential occupants of MTEs and non-MTEs. The OEA concluded mandatory access laws are associated, on average, with a modest increase in the supply of broadband in MTEs, and hypothesized that this increase in subscription rates may be a result of a reduction in the marginal, or fixed, cost of supplying broadband or the result of increased consumer choices.
- Call One [spoke with](#) Wireline Competition Bureau staff on July 9, 2019, to reiterate its position that USTelecom's Petition for Forbearance from the section 251(c)(4) wholesale resale obligation should be denied for the reasons stated in a previous [letter](#) and [comments](#). It urged the FCC not to eliminate the

251(c)(4) wholesale resale requirement; but said if it does, an appropriate transition period would be the latter of the last date the ILECs' discontinue offering TDM-based services to SMB customers or 5 years from the effective date of the FCC's forbearance decision.

- WorldNet [spoke with](#) Commissioner Stark's Acting Legal Advisor on July 9, 2019, to respond to a request for clarification on WorldNet's advocacy in the proceeding addressing USTelecom's Petition for Forbearance on the special circumstances present in Puerto Rico, including continuing network recovery and reconstruction efforts in the wake of the 2017 Puerto Rico hurricanes. WorldNet also [met with](#) Commissioner O'Rielly's Advisor on July 11, 2019, to discuss USTelecom's forbearance petition relating to loops as applied to Puerto Rico
- USAC filed a [letter](#) on July 9, 2019, providing the preliminary results of its recent use of airborne drones to measure mobile wireless coverage in post-hurricane Maria Puerto Rico. USAC said its vendor conducted a total of 20 drone tests in Puerto Rico and found the test evidence suggests drones are capable of quickly surveying smaller areas, but may not be as useful for surveying larger areas in a cost-effective manner at this time.
- Free Press filed a [letter](#) on July 11, 2019, to urge the Commission to proceed with caution as it reforms the Form 477 data collection and expressed support for policies that will bring more broadband competition to all households. Free Press said the current Form 477 deployment data methodology and method of public dissemination has a proven track record of success and the Commission should only make changes that provide the agency staff, outside researchers, and Congress with the most informative data.
- The Leadership Conference on Civil and Human Rights filed a [letter](#) on July 12, 2019, to urge the Commission to update the Form 477 process and methodology for broadband mapping in order to collect more granular and accurate data to determine broadband availability. It also said the Commission must incorporate key metrics in its data collection process to ensure broadband availability is accurately measured in underrepresented and marginalized communities that have historically lagged behind in connectivity.

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## Robocalls

- Chairman Pai [proposed](#) adoption of new rules banning malicious caller ID spoofing of text messages and international calls on July 8, 2019, which will be voted on at the FCC's August 1, 2019 Open Meeting. The announcement said Pai's proposal follows a bipartisan call from more than 40 state attorneys general for the FCC to adopt these new anti-spoofing rules, and if adopted, the rules would implement the Truth in Caller ID legislation and extend these prohibitions to text messages, calls originating from outside the United States to recipients within the United States, and additional types of voice calls, such as one-way interconnected VoIP calls.
- The FCC issued a [Public Notice](#) on July 9, 2019, announcing the [agenda](#) for the summit on July 11, 2019, on implementation of the SHAKEN/STIR caller ID authentication framework to combat illegal robocalls and caller ID spoofing. Topics will include: progress made by major voice service providers toward deploying the SHAKEN/STIR framework; the use of caller ID authentication to reduce spoofed robocalls and improve the consumer experience; and challenges and potential solutions to deployment of SHAKEN/STIR by smaller voice service providers.
- Chairman Pai issued a [statement](#) on the SHAKEN/STIR Robocall [Summit](#) on July 11, 2019. Pai said he is optimistic that the major voice service providers will meet the end-of-2019 deadline for implementation and said he stands ready to take regulatory action if this deadline is not met.
- Carriers responded on July 10, 2019, to [letters](#) from Commissioner Starks on ways to combat unwanted robocalls. [AT&T](#) said it is expanding AT&T Call Protect service to provide automatic blocking of suspected fraud calls on an opt-out basis, at no charge, to new AT&T Mobility customers and is developing plans to provision call-blocking and labeling tools to even more of its customers in the coming months, also at no charge. [Vonage](#) said it plans to implement the SHAKEN/STIR framework

during 2019, and intends to offer default call blocking services on an informed opt-out basis and will absorb the costs for residential customers. [Charter](#) said it is implementing the SHAKEN/STIR framework throughout its residential service footprint and committed to be able to sign and verify calls on its network by the end of this year. [Cox](#) said it has been actively involved for several years in the efforts across various industry standards fora to develop the SHAKEN/STIR framework. Cox said it provides other call blocking features for its customers, and allows customers to create a personal blacklist of telephone numbers that will be blocked or rejected. Cox also said it blocks inbound calls purportedly originating from 10-digit numbers that are not valid NANP numbers as authorized by the FCC's 2017 Call Blocking Order. [Bandwidth](#), [Comcast](#) and [Google](#) also responded. [All responses available to date](#). [Commissioner Starks](#) issued a statement on the responses.

- The Alarm Industry Communications Committee filed a [Petition for Clarification or Reconsideration](#) on July 8, 2019, of the [Declaratory Ruling](#) that clarified voice service providers may block illegal and unwanted calls as the default before they reach consumers' phones. AICC seeks clarification that: direct customer notification of call-blocking programs is necessary; alarm company notifications are the type of emergency communication the Commission cautions voice service providers must safeguard; and voice service providers must implement any call-blocking program in a non-discriminatory fashion.
- LucidTech [met with](#) Consumer and Governmental Affairs Bureau staff on June 20, 2019, to discuss the steps required to support robocall tracebacks as SHAKEN/STIR is deployed and the challenges associated with a verification display intended to demonstrate to the public that the call has been attested to via SHAKEN/STIR. LucidTech said because the intent of calls cannot be attested to and because callers with fraudulent intent will be able to make outbound phone calls from telephone numbers that have legitimately been assigned to them, it is possible that providing a green checkmark or other verification display runs the risk of conferring validity to the phone call beyond the display's intent.

## Universal Service

- Fourteen Members of Congress sent a [letter](#) to Chairman Pai and Commissioners Carr, O'Rielly, Starks, and Rosenworcel on July 9, 2019, urging them not to establish an overall cap for the Universal Service Fund or combine the cap of any of the USF programs, consistent with the recent unanimous vote in the House of Representatives. They said imposing an overall cap on the USF would unnecessarily cut funding to USF programs and is detrimental to the goal of universal service to put the various USF programs in direct competition for USF funds.
- OTA - The Oklahoma Rural Broadband Association filed a [letter](#) on July 10, 2019, to express support for the [letter](#) filed by the Schools, Health, Libraries and Broadband Coalition providing a joint statement from organizations and associations opposing the FCC's proposal to cap the Federal USF. OTA said a cap would limit broadband in rural areas, limit high-speed internet access in rural classrooms, shorten the reach of telehealth, and limit opportunities for those who need it most.
- The FCC released an [NPRM](#) on July 9, 2019, proposing to amend the rules to make permanent the E-rate category two (internal connections) budget approach for all applicants. It also seeks comment on ways to improve the category two budget approach and how best to transition from the five-year test period to a permanent extension of this approach. Comments are due 30 days after publication in the Federal Register; replies are due 45 days after FR publication.
- Commissioner Carr released a [statement](#) on July 8, 2019, expressing support for, and providing statements from other entities who support, the [NPRM](#) proposing a new \$100 million Connect Care Pilot, which will be considered at the FCC's July 10, 2019 Open Meeting. This program will support telehealth for low-income Americans, including those living in rural areas and veterans.
- Commissioner Rosenworcel [spoke at](#) the Digital Equity Summit 2019: Bridging the Learning @ Home Gap on July 8, 2019, discussing the homework gap and the E-rate program. She said 12 million kids across the country lack the internet access they need for nightly schoolwork. She said to solve the homework gap, data needs to be gathered locally and awareness raised, and the FCC needs to develop better data about where broadband is and is not. She also said since changes have been made to the E-rate program a few years ago, more than 40 million more students have been



connected to high-speed internet at school and there has been a 525 percent increase in the schools receiving category two funding commitments for wi-fi.

- NARUC [released](#) draft resolutions on July, 10, 2019, that will be considered at its July 2019 Summer Policy Summit, including three telecom resolutions. The first resolution urges the FCC to maintain the full support for voice services in the Lifeline program at December 1, 2018 levels and not phase-down or eliminate support for voice services as it has proposed for 2019 to 2021. The second resolution supports the establishment of self-enforcing budget caps for the Lifeline and CAF programs similar in nature to self-enforcing caps in place in the E-rate and RHC programs and opposes the proposed cap limiting the total budget for the overall USF. The third urges the FCC and USAC to consider halting or suspending the National Lifeline Verifier hard launch rollout in any additional states or territories through 2019 and suggests the FCC suspend mandated increases in the data allotment for Lifeline services set for this December.
- USAC sent a [letter](#) to Wireline Competition Bureau staff on July 10, 2019, providing information requested from USAC on the Rural Health Care program to assist the Bureau in its analysis of the program.
- Quintillion Subsea Operations [met with](#) Wireline Competition Bureau staff on July 3, 2019, to discuss its June 19, 2019 [ex parte](#) on E-rate and Rural Health Care and the need to modernize the competitive bidding process across the Rural Health Care and E-Rate programs. It reviewed analysis of bidding information from both programs that it said shows a single carrier, GCI, receives 75 percent of Alaskan funding, with 50 percent of these commitments receiving a single bid. Quintillion discussed rule reforms to improve the competitive bidding process in these two programs.

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## Misc.

- The FCC adopted the following items at its July 10, 2019 [Open Meeting: a Report and Order on remand](#) granting price cap carriers relief from ex ante pricing regulation of their lower speed TDM transport business data services nationwide and partially granting USTelecom's request for forbearance from DS1 and DS3 transport unbundling obligations for price cap carriers; an [NPRM](#) proposing a connected care pilot; a [report and order](#) increasing flexibility for use of the 2.5 GHz spectrum for existing educational broadband service licensees and providing opportunities for rural tribal nations and other entities to access unused portions of the band; a [public notice](#) establishing 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 and declaratory ruling](#) promoting facilities-based broadband deployment and competition in multiple tenant environments; a [report and order](#) modernizing children's TV programming rules and an FNPRM seeking additional comment on special efforts by broadcasters to produce or support core programming; a [report and order](#) modernizing the carriage election notice provisions in Part 76 and an FNPRM seeking comment on applying these new procedures to entities not required to maintain online public inspection files; and an [NPRM](#) proposing to modernize certain cable and satellite TV provider notice provisions.
- The FCC issued a [tentative agenda](#) for its August 1, 2019 Open Meeting. The FCC will consider an [NPRM](#) proposing to establish a new Rural Digital Opportunity Fund that would target support to areas that lack 25/3 Mbps broadband service and distribute \$20.4 billion in high-cost USF support over 10 years using a two-phase reverse auction framework, and a [report and order and second FNPRM](#) that would establish a new Digital Opportunity Data Collection to collect geospatial broadband coverage data from fixed providers, adopt a "crowdsourcing" process on the accuracy of the maps, make targeted changes to the existing Form 477 to reduce filing burdens, and seek comment on enhancing the new data collection, incorporating mobile voice and broadband, and improving satellite broadband reporting. The FCC will also consider: a [report and order](#) that would overhaul the Rural Health Care Program by streamlining and simplifying the way health care providers apply for and calculate USF support amounts; a [report and order](#) that would create a new, optional streamlined application process designed for a class of satellites referred to as "small satellites"; a [report and order](#) addressing calls to 911 made from multi-line telephone systems, pursuant to Kari's Law, the conveyance of dispatchable

location with 911 calls, as directed by RAY BAUM'S Act, and the consolidation of the FCC's 911 rules; a [public notice](#) that would adopt procedures for the auction of certain toll-free numbers in the 833 code; an [NPRM](#) proposing to modernize the LPFM technical rules to provide more regulatory flexibility for licensees; a [third report and order](#) addressing issues raised by a remand from the U.S. Court of Appeals for the Sixth Circuit concerning how franchising authorities may regulate incumbent cable operators; and a [second report and order](#) that would amend the Truth in Caller ID rules to implement the anti-spoofing provisions of the RAY BAUM'S Act.

- Chairman Pai [wrote a blog](#) on July 10, 2019, on items the FCC will consider at the August Open Meeting. Pai said he is circulating a proposal to establish the Rural Digital Opportunity Fund, explaining this Fund would take a similar approach as the CAF Phase II reverse auction and provide \$20.4 billion over the next decade to support high-speed broadband networks in rural America. Pai is proposing to disburse support in two phases using a multi-round, descending-clock reverse auction, increasing the minimum speed from 10/1 Mbps to 25/3 Mbps, and to open the auction to all types of internet service providers. Pai said another item the FCC will consider is the Digital Opportunity Data Collection, which is new approach to mapping that will collect granular broadband availability maps from service providers using shapefiles. The FCC will also consider an item making changes to the Rural Health Care program, including the way the FCC calculates the rates that health care providers must pay and the amount of support they will receive.
- NECA and NTCA filed a [motion](#) with the D.C. Circuit Court of Appeals on July 8, 2019, to file an amicus brief in support of the FCC in the case addressing the Irregularators, et al.'s [Petition for Review](#) of the FCC's [Order](#) that extended the separations freeze. They said because of NECA's unique position in administering telecommunications and broadband mechanisms on behalf of NECA's pool members, it has a strong interest in the outcome of this proceeding. They also said because NTCA member companies must file tariffs in accordance with the rules at issue in the petition, either on their own behalf or through NECA as the filing and pooling entity, NTCA also has a strong interest in the outcome of this proceeding.
- No replies 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](#)
- To date, no comments filed 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](#)

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## Upcoming Filing Dates

- 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 Wyverd Group requesting consent to transfer control of Accipiter Communications d/b/a Zona Communications from Pinpoint Holdings to Wyverd. [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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