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July 23, 2018 HIGHLIGHTS

- The FCC released an [FNPRM](#) on its proposal to extend the jurisdictional separations freeze for 15 years. Comments are due 30 days after publication in the Federal Register.
- The Wireline Competition Bureau [announced](#) the timeline for completion of the 2019 urban rate survey. Completed surveys are due August 24, 2018.
- The Wireline Competition Bureau [authorized](#) 175 current A-CAM companies to receive additional A-CAM support in exchange for extending broadband service to additional locations.
- The Wireline Competition Bureau issued a [Public Notice](#) to continue the challenge process for Alaska Communications Systems to identify areas eligible for its CAF Phase II frozen support.
- The FCC [announced](#) OMB approval of the information collection associated with the Alaska Plan [Order](#). Amendments to sections 54.313(f)(1)(i), 54.313(f)(3), and 54.313(l) are effective July 17, 2018.
- The Wireline Competition Bureau [seeks comment](#) on Verizon's [Petition for Declaratory Ruling](#) on terminating switched access charges. Comments due August 20, 2018; replies due September 5, 2018.
- [Comments were filed](#) on the access stimulation [NPRM](#). Replies are due August 3, 2018.
- The House Subcommittee on Communications and Technology held a [hearing](#) on "Realizing the Benefits of Rural Broadband: Challenges and Solutions."
- Sen. Mike Coffman (R-Colo.) introduced a [bill](#) entitled "The 21st Century Internet Act," intended to codify the four corners of net neutrality: no throttling, no blocking, no paid prioritization, and oversight of interconnection.
- Oppositions to petitions for reconsideration of the Rural Call Completion [Order](#) filed by [NTCA](#) and [USTelecom](#) [are due](#) August 2, 2018, and replies are due August 13, 2018.
- Rep. Adam Kinzinger (R-Ill.) [introduced H.R. 6422, the FCC Transparency Act](#), which would require the FCC to publish on its website the documents to be considered by the Commission at least 21 days ahead of a vote. The House Communications and Technology Subcommittee will hold [a hearing](#) on July 25, 2018, on oversight of the FCC.
- [Comments were filed](#) on [input](#) for an FCC staff report on the progress of robocalling initiatives among government, industry, and consumers. Replies are due August 20, 2018.
- Tri-County Telephone Association [seeks reconsideration](#) of the Uniendo a Puerto Rico Fund and the Connect USVI Fund [Order](#).

Other Key Upcoming Dates

- July 23 - Replies due to oppositions to Verizon's [Application for Review](#) of the [Order on Reconsideration](#) on increasing the buffer radius for the Mobility Fund challenge process.
- July 23 - Oppositions [due](#) to Petitions for Reconsideration of the Tribal OpEx Order.
- July 26 - Comments due on the [NPRM](#) on how best to structure the second stage of the Uniendo a Puerto Rico Fund and Connect USVI Fund. Replies are due Aug. 8, 2018.

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USF Reform

- The Wireline Competition Bureau issued a [Public Notice](#) on July 17, 2018, to announce the timeline for completion of the 2019 urban rate survey. It indicated notifications that a provider is required to complete a survey will be sent via email to each selected provider's FCC Form 477 contact person and certifying official on Wednesday, July 18, 2018. The email notification will provide detailed information on how to access and complete the survey online report form and how to obtain technical assistance. Completed surveys will be due on Friday, August 24, 2018.
- The Wireline Competition Bureau issued a [Public Notice](#) on July 20, 2018, announcing it authorized 175 current A-CAM companies that elected 210 revised offers of A-CAM support to receive additional model-based support in exchange for extending broadband service to additional locations. Under this second revised offer, all locations with costs above \$52.50 will be funded up to a per-location fund cap of \$146.10, with adjusted deployment obligations. The Bureau released a [report](#) showing the revised authorization amount and deployment obligations for each carrier that elected a revised offer and a [report](#) showing the revised state-level amounts of model-based support and associated deployment obligations. Collectively, the net increase in annualized support compared to the previously-elected A-CAM amounts is approximately \$36 million. The Bureau said this increase, however, will be partially offset by transition payments already disbursed that will be reduced or eliminated going forward due to the per-location cap's increase.
- The Wireline Competition Bureau issued a [Public Notice](#) on July 19, 2018, to continue the challenge process for Alaska Communications Systems to identify areas eligible for its CAF Phase II frozen support. It said ACS has filed a [second list](#) of 4,691 additional locations in partially-served census blocks to which it proposes to deploy using Phase II support. Providers that qualify as an unsubsidized competitor now have 45 days, until September 4, 2018, to notify ACS and the Commission that they already serve the specific locations in those blocks identified by ACS. Any identified locations that receive no response will automatically be deemed eligible for ACS deployment with Phase II frozen support.
- Alaska Communications filed a [letter](#) on July 16, 2018, requesting an extension of the October 1, 2018 deadline for filing the proposed locations in partially served census blocks that it intends to serve using CAF Phase II support. It asserted certain unserved census blocks not previously identified in the model as high cost should qualify for support as having per-line costs in excess of the high-cost threshold, and claimed other census blocks previously thought to be partially served by an unsubsidized competitor have been identified as unserved and thus eligible for support. ACS said it is not confident it will be able to identify a sufficient number of locations to meet its obligations under the Alaska Communications CAF II Order in fewer than 60 days from the resolution of the outstanding eligibility questions, and requested 60 days in which to complete its planning of locations following the resolution of open questions as to eligible census blocks and locations.
- The FCC published a [notice](#) in the Federal Register on July 17, 2018, announcing OMB approval of the information collection associated with the rules for the Connect America Fund in the Alaska Plan [Order](#). Amendments to sections 54.313(f)(1)(i), 54.313(f)(3), and 54.313(l) are effective July 17, 2018.
- USTelecom [met with](#) Commissioner Carr's Chief of Staff on July 16, 2018, to discuss issues in its June 29 [ex parte](#) on the need for the Commission, as it moves forward with the CAF Phase II Auction, to address the treatment of obligations and support for voice services in high cost areas that are not funded as part of the CAF II program.
- TDS, Hargray Communications, Consolidated Companies of Nebraska, Great Plains Communications, and ITTA [met separately with](#) Commissioner O'Rielly and Commissioner [Carr's Advisor](#) on July 11, 2018, to urge the Commission to fully fund separate budgets for the A-CAM program and the legacy support mechanisms. They also suggested, once this has been done, the Commission should render a second A-CAM offer, which should be open to all RoR carriers and be available to carriers serving census blocks where there is already some fiber deployment in part of the census block and to carriers having deployed 10/1 Mbps to at least 90 percent of their eligible locations.

- JSI filed [a letter](#) on July 19, 2018, on behalf of Allband to submit consolidated 2017 audited financial statements for Allband Communications Cooperative and Allband Multimedia, per the 2018 Allband Waiver [Order](#).
- Mutual Telephone Company of Sioux Center [spoke with](#) Wireline Competition Bureau staff on July 16, 2018, to discuss the Joint Application for domestic section 214 transfer of control filed April 30, 2018, by Mutual and Hospers Telephone Exchange. Mutual expressed its understanding of the conditions set forth in the [Hargray-ComSouth Order](#) as they apply to average schedule companies if and when an average schedule company converts to a cost company. Mutual also discussed its understanding of the applicability of those conditions to its Joint Application.
- In addition to oppositions listed in a previous edition of *REGScan*, [Smith Bagley](#) filed an opposition to Verizon's [application for review](#) of the April 30, 2018 [Order on Reconsideration](#) that determined the Mobility Fund II challenge process would use a 400-meter buffer radius to assess challenges to areas initially deemed ineligible for MF-II support. Smith Bagley said Verizon's application threatens to expand areas incorrectly designated as served, and the Commission should affirm the Bureau's decision to increase the maximum distance between speed test measurements to 800 meters and the associated buffer radius to 400 meters. Replies are due July 23, 2018. [Public Notice | All oppositions available to date](#).
- World Network International Services filed a [Petition](#) for expedited reconsideration of the Bureau's decision to disqualify it for the CAF Phase II auction. It claimed the four points stated in the listings of applicant deficiencies are factually incorrect, a distortion of the rules, create new unreasonable unanticipated disqualifications, and are subjective in nature as evidenced by the FCC grant of the SpaceX petition on March 28, 2018, for the same proposed topologies. WNIS also seeks the admission of new evidence as to the recent change in company status to a disabled owner business enterprise.

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ICC

- The Wireline Competition Bureau issued a [Public Notice](#) on July 20, 2018, setting August 20, 2018, as the due date for comments on Verizon's [Petition for Declaratory Ruling](#), filed June 15, 2018. Verizon asks the Commission to confirm that if a LEC delivers a call to a two-stage dialing platform, including an IP-enabled platform, the LEC does not perform terminating switched access functions and cannot charge tariffed end office terminating switched access charges for that call. Verizon said this Petition arises from ongoing litigation, including a primary jurisdiction referral from the U.S. District Court for the Northern District of Illinois in March 2018. Reply comments are due September 5, 2018.
- Comments were filed July 20, 2018, on the [NPRM](#) that proposes to give access stimulating LECs two choices for receiving calls: to be financially responsible for the delivery of calls to its network; or to accept direct connections from long-distance carriers seeking to terminate telephone calls to the LEC or from intermediate access providers of the long-distance carriers' choosing. [NTCA](#) supported the proposals, and said access-stimulating LECs that elect direct interconnection should be required to accept direct connections at current points of interconnection with intermediate access providers, as well as at the LECs' end office, and to provide notice to the IXC of these locations. NTCA also suggested the Commission retain its current definition of access stimulation, and should defer any decision on whether to transition to bill-and-keep and on direct interconnection to broader ICC reform. [Iowa Network Services](#), dba Aureon, said the proposed rules in the NPRM will fail to solve the problem and it is time for the Commission to adopt a rule that outlaws access stimulation once and for all. It claimed the proposal to move the payment responsibility for terminating switched access service from IXCs to LECs does not stop current arbitrageurs from continuing to share transport revenue with their affiliate access stimulator, and exempting IXCs from paying for tandem-switching and transport creates incentives for IXCs to engage in arbitrage. It further claimed the proposal to require direct connections merely changes the route and the source of revenue for arbitrage from tandem-switched transport to

direct-trunked transport (plus transit facilities). Aureon also said if the Commission implements the new rules it proposes, the Commission should safeguard the CEA network's benefits to the public by ensuring that all traffic bound for CEA network subtending LECs is transported over the CEA network. [Sprint](#) said it is now time to eliminate the financial incentive to engage in traffic pumping by moving to full bill-and-keep. It argued the other proposals raised in the NPRM: will not be as effective as a system of bill-and-keep; will not eliminate costly transport expenses associated with interconnection at a distant LEC end office; and may be of only limited feasibility in rural areas where there are no competitive alternatives to the LEC's preferred intermediate access partner. Reply comments are due August 3, 2018. [All comments available to date.](#)

- South Dakota Network [met separately with](#) Advisors to Chairman Pai and Commissioner O'Rielly and [Wireline Competition Bureau](#) staff on July 11 and 12, 2018, to assert centralized equal access switching is a fundamentally different service than the tandem switching service provided by CenturyLink and, therefore, CenturyLink's rate is an inappropriate benchmark for Aureon's rates. SDN reiterated its position that the appropriate course would be to find there is no appropriate benchmark for CEA switching, and instead continue to require cost-based CEA switching rates. SDN also urged the Commission to make clear that any findings made in the Aureon tariff proceeding are based upon the facts of that case and expressly limited thereto.
- INCOMPAS, Sonic Telecom, Socket Telecom, U.S. TelePacific, Granite Telecommunications, IdeaTek Telcom, Access One, Gorge Networks, First Communications, Allstream Business U.S, Digital West Networks, Mammoth Networks, Biddeford Internet Corporation, and Virginia Global Communications [met with](#) Wireline Competition Bureau staff on July 11, 2018, to discuss the importance of access to UNEs, such as DS0, DS1 and enhanced extended loops, and the importance of unbundled interoffice dark fiber transport for providing service to rural markets. They also discussed the lack of special access or commercial alternatives for certain UNEs, and claimed forbearance from section 251(c)(3)'s unbundling obligations would significantly inhibit or eliminate CLECs' ability to continue building their fiber networks and transitioning customers. They suggested rather than forcing a one-size-fits-all timeframe onto a diverse marketplace, the Commission should adhere to the natural forbearance under its current rules, such that in markets where ILECs have completed copper retirement, they gain full relief from DS0 unbundling obligations and in markets where ILECs have yet to discontinue copper, CLECs should be able to retain access to UNEs.
- Aureon Network Services filed a [letter](#) on July 20, 2018, to provide its consent to reclassify as public certain information that Aureon had previously designated as confidential in the [proceeding](#) investigating Aureon's tariff revisions, filed on February 22, 2018. Aureon redesignated as "Public" the following information: Fully Distributed Cost; Rate of Return; Aureon's Annual Average Weighted Miles; and the Methodology Used in Aureon's Rate Development Calculation. Aureon also [spoke with](#) Wireline Competition Bureau staff to discuss the Bureau staffs' request that certain materials designated as confidential by Aureon be re-designated as public.
- Iowa Network Services, d/b/a Aureon Network Services, filed the public redacted version of its [surreply](#) to the [surrebuttal](#) of AT&T in the proceeding investigating Aureon's 2018 access tariff filing. Aureon claimed AT&T's assertion that Aureon's rate for centralized equal access service is excessive because the rate exceeds the rate benchmark for CLECs is without merit because Aureon is not a CLEC. It argued if, arguendo, Aureon were a CLEC, however, Aureon's CEA rate is not excessive because Aureon's tariff rate complies with the FCC's affiliate transaction rules and is fully supported by Aureon's cost and demand data. It also argued to the extent CLEC non-dominant carrier rules even apply to Aureon, AT&T is incorrect in its assertion Aureon should only be permitted to bill a rate less than or equal to the CenturyLink CLEC rate benchmark because CenturyLink does not provide service comparable to CEA service, and CenturyLink is not the competing ILEC for benchmarking purposes.

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Broadband

- The House Subcommittee on Communications and Technology held a [hearing](#) on July 17, 2018, on “Realizing the Benefits of Rural Broadband: Challenges and Solutions.” The witnesses were: [Justin Forde](#), senior director at Midcontinent Communications; [Claude Aiken](#), president and CEO of WISPA; [John C. May](#), president of Ag Solutions and CIO of Deere & Company; [Jenni Word](#), RN, associate administrator and chief nursing officer of the Wallowa Memorial Hospital; and [Suzanne Coker Craig](#), small business owner and former commissioner in Pinetops, North Carolina.
- The FCC placed an item on [circulation](#) on July 16, 2018, entitled “Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion.”
- Verizon and USTelecom [met with](#) Wireline Competition Bureau staff on July 18, 2018, to discuss USTelecom’s [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. Verizon discussed its experiences with unbundled network elements and said leasing UNEs has not been part of its strategy and its limited use of them, resulting primarily from its 2017 purchase of XO, is declining. Verizon also discussed the aggregated data USTelecom submitted in the record and explained that Verizon’s company data that was incorporated into that aggregation included all demand in all states, and said its individual company data reflected a similar distribution between DS0s, DS1s, DS3s, and EELs as did the aggregated data.
- The Seminole Tribe of Florida et al. filed a [Motion](#) in the D.C. Circuit Court on July 18, 2018, asking the Court to stay implementation of the Wireless Infrastructure [Order](#), pending resolution of court appeals. Petitions for Review of the Order were filed by the [Natural Resources Defense Counsel](#), the [Crow Creek Tribe of South Dakota and Omaha Tribe of Nebraska](#), and [Seminole Tribe of Florida et al.](#) They said a stay pending review of the Order is urgently needed to prevent the FCC from allowing the rapid deployment of wireless infrastructure without adequate tribal input, in violation of federal law, and before the Court has an opportunity to review the merits of this case.
- Hughes Network Systems [spoke separately with](#) Advisors to Chairman Pai and Commissioner O’Rielly on July 12, 2018, to express concern with the Bureau’s [Network Performance Testing Order](#)’s decision to require CAF recipients in the higher-latency tier to meet live conversation-opinion tests. It asserted by requiring high-latency bidders to meet one component of the ITU-T P.800 standard, the Bureau Order imposes an unnecessary burden that violates the Commission’s principle of competitive neutrality. It also said the Commission should clarify that high-latency recipients of CAF support awarded through the New NY Broadband Program are required to comply with the provisions of the New York Waiver Order, rather than the Bureau Order, with respect to compliance with the ITU-T P.800 MOS requirement, claiming that recommendation allows either listening or conversation testing, and since New York support has already been awarded, parties cannot be subjected to burdensome new requirements after the auction already has closed. Hughes [also met with](#) Chairman Pai’s Advisor on July 18, 2018, to discuss similar issues.
- NTIA filed a [letter](#) on July 19, 2018, to express support for Commission actions to accelerate the ongoing modernization of the Nation’s communications infrastructure, but said it remains concerned that streamlined regulatory requirements may place federal departments and agencies that rely on services subject to discontinuance in the position of losing access to critical national security and public safety communications functionality. NTIA expressed support for the Commission’s decision to extend the streamlined processing rules it adopted last November for legacy voice and data services operating at speeds less than 1.544 Mbps to carrier applications to discontinue data services at speeds below 25/3 Mbps. It also said it supports the Commission’s decision to retain the “adequate replacement test” it adopted in 2016 as a precondition, in certain circumstances, to streamlined processing of carrier applications to discontinue legacy voice services.
- NCTA, Cox, and Charter [met separately with](#) Commissioners O’Rielly and Carr’s Legal Advisors on July 16, 2018, to express support for balanced reforms to the pole attachment rules that promote new investment in broadband while protecting the safety and reliability of existing networks. They expressed concern that the one-touch make-ready policy does not strike the appropriate balance and

would jeopardize the safety and reliability of existing cable networks. They also encouraged the Commission to specifically identify the portions of any new rules that would require approval by OMB pursuant to the Paperwork Reduction Act.

- The Competitive Carriers Association filed a [letter](#) on July 16, 2018, to assert sections 253 and 332 of the Communications Act provide the Commission the necessary authority to address local siting processes that effectively prohibit carriers from providing telecommunications services. CCA also said expeditious Commission action to address remaining deployment barriers is necessary to further the United States' position as a leader in 5G development. CCA recommended the Commission interpret the fair and reasonable compensation language in section 253 to clarify fees charged by state and local governments must be cost-based, nondiscriminatory, and publicly available.
- The Smart Communities and Special Districts Coalition [met with](#) General Counsel staff on July 13, 2018, to discuss local government land use and permitting processes, the costs involved, and other land use issues.
- The Internet Innovation Alliance [released](#) a [white paper](#), entitled "Evolving Preferences: Consumer Preferences Tilting Towards Mobile Broadband," on July 17, 2018. IIA claimed the survey results show consumer preferences have changed, consumers now see fixed and mobile broadband services as essentially the same, and consumers use mobile broadband services to perform bandwidth-intensive activities, like streaming video and watching news and sports. IIA called upon the FCC to update and modernize its approach to reporting to Congress on the deployment of advanced telecommunications capability in the United States.
- CTIA filed a [letter](#) on July 19, 2018, attaching a study entitled [Accelerating Future Economic Value From the Wireless Industry](#), conducted by Accenture Strategy and commissioned by CTIA. CTIA asserted the study estimates that reducing regulatory review timelines to accelerate deployment by 12 months would unleash an additional \$100 billion in economic growth over the next three years. CTIA urged the Commission to establish clear timelines for the entire local review process, with enforceable remedies, and ensure that fees charged by state and local governments are cost-based, non-discriminatory, and transparent. CTIA also expressed support for the draft [Declaratory Ruling](#) that will be considered at the FCC's August Open Meeting, which will clarify that moratoria are barriers to wireless deployment and prohibited under the Communications Act.

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Open Internet

- Sen. Mike Coffman (R-Colo.) introduced a [bill](#) on July 17, 2018, entitled "The 21st Century Internet Act." The bill would codify the four corners of net neutrality: no throttling, no blocking, no paid prioritization, and oversight of interconnection. The bill also would create a new title for broadband and contains enhanced protections for both consumers and businesses. [press release](#)
- VCXC sent a [letter](#) to Chairman Pai on July 17, 2018, suggesting there remains an opportunity for the Commission to help obtain a grant of certiorari in the challenge to the Open Internet Order via the agency's reply to "Daniel Berninger, et al. v. Federal Communications Commission" due by August 15, 2018. It said a Supreme Court decision declaring Chevron deference unconstitutional in the context of the Open Internet Order ends the presumption of discretionary authority to regulate the internet underlying the Restoring Internet Freedom Order (and removes the need for the RIF Order). VCXC argued endless cycling through the Court of Appeals to the D.C. Circuit cannot resolve the controversy, and Commission support for a grant of certiorari on the question of discretionary authority over the internet holds the further merit of freezing RIF Order litigation.

Universal Service

- Commissioner Carr [spoke at](#) the University of Mississippi Medical Center event on the FCC'S Connected Care Pilot Program on July 17, 2018. He said connected care technologies are greatly improving health outcomes for patients and the FCC can play a constructive role by helping to support the connectivity and deployments needed to ensure all communities get a fair shot at benefiting from new telehealth technologies. He announced on August 2, 2018, the FCC will seek to establish a new \$100 million Connected Care Pilot Program, and if adopted, this new program would target support to connected care deployments that would benefit low-income patients.
- The Wireline Competition Bureau issued a [Public Notice](#) on July 18, 2018, to announce the updated minimum service standards levels for speed and usage allowances for Lifeline-supported services, as required by the 2016 Lifeline [Order](#). Beginning December 1, 2018, the Lifeline minimum service standard for fixed broadband speed will be 18 Mbps/ 2 Mbps, and for data usage, 1000 GB per month. Also beginning December 1, 2018, the Lifeline minimum service standard for mobile broadband data usage will increase to 2 GB per month; for speed, it will remain 3G mobile technology; and for mobile voice service, it will increase to 1000 minutes per month. The Bureau also announced the budget for the Lifeline program for calendar year 2019 will be \$2,327,114,250.
- The Wireline Competition Bureau issued a [Public Notice](#) on July 18, 2018, seeking comment on three petitions for ETC designation in the state of New York for the purpose of being eligible to receive Connect America Fund support as awarded by New York's New NY Broadband Program for state and CAF support. Petitions were filed by [DTC Cable, Inc.](#), [Heart of the Catskills d/b/a/ MTC Cable](#), and [Mohawk Networks](#). Comments are due August 2, 2018; replies are due August 13, 2018.
- The Wireline Competition Bureau issued an [Erratum](#) on July 20, 2018, to correct Appendix A, Declaration of Daniel J. Margolis, which was attached to its [Order](#) denying a [Petition](#) for Stay pending judicial review of the Lifeline [Fourth Report and Order](#).
- Tri-County Telephone Association filed a [Petition](#) on July 13, 2018, seeking reconsideration of the Uniendo a Puerto Rico Fund and the Connect USVI Fund [Order](#). It seeks reconsideration on the basis: the Commission failed to provide notice and seek comment on the Stage 1 funding for immediate restoration, and to provide adequate record support for the funding levels provided in the Stage 1 funding; Congress did not intend the high-cost program to be used for the purpose of general disaster relief as provided by the Stage 1 funding; and the Commission has unlawfully expanded the scope and purpose of the USF when it opted to use the USF as insurance for natural disasters.
- The State Educational Technology Directors Association filed a [reply](#) on July 19, 2018, to [SECA's comments](#) on the [NPRM](#) proposing ways to ensure that USF support is not used to purchase equipment or services from companies posing a national security threat to the integrity of communications networks or the communications supply chain. SETDA expressed support for SECA's position that, at a minimum, E-rate service providers should be required to certify via an additional certification on existing FCC Forms 473 and/or Form 498 that the products and/or services they are proposing to applicants are fully compliant with the Commission's national security rules. SETDA also asserted E-rate applicant compliance should be based on the assurances and certifications of its service providers, not the applicants themselves.

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Call Completion

- The FCC published a [notice](#) in the Federal Register on July 18, 2018, announcing oppositions to petitions for reconsideration of the Rural Call Completion [Order](#) filed by [NTCA](#) and [USTelecom](#) are due August 2, 2018, and replies are due August 13, 2018.

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Misc.

- The Commission released an [FNPRM](#) on July 18, 2018, seeking comment on its proposal to extend the jurisdictional separations freeze for 15 years. It also seeks comment on whether the Commission should alter the scope of its referral to the Joint Board regarding comprehensive separations reform, and seeks comment on allowing rate-of-return carriers that elected to freeze their category relationships in 2001 to opt out of that freeze. Comments are due 30 days after publication in the Federal Register, and replies are due 45 days after publication.
- Rep. Adam Kinzinger (R-Ill.) [introduced H.R. 6422, the Federal Communications Commission \(FCC\) Transparency Act](#), on July 19, 2018, which would require the FCC to publish on its website the documents to be considered by the Commission at least 21 days ahead of a vote. Commissioner O’Rielly released [a statement](#) saying as a result of this practice, unnecessary discussions of non-existent issues have been eliminated, conversations are more productive, Commissioners are still speaking their minds, and negotiating internally on items and work product has greatly improved. He said he believes codifying this practice is important to ensuring its longevity.
- The House Communications and Technology Subcommittee will hold [a hearing](#) on July 25, 2018, on oversight of the FCC.
- Comments were filed July 20, 2018, on the [Public Notice](#) seeking data and other information for an FCC staff report on the progress of robocalling initiatives among government, industry, and consumers, and seeking data and other information, including notable trends in illegal robocalling, for a baseline period of January 2018. [AT&T](#) said it offers its customers a number of tools to reduce the number of illegal and unwanted calls they receive, and it has committed to be among the first providers in the industry to implement the caller ID authentication framework known as SHAKEN/STIR. AT&T also said it is actively engaged in blocking illegal calls, including the categories of calls authorized for provider-initiated blocking in the *2017 Call Blocking Order*. AT&T suggested there is so much more it and the industry could be doing to target and block illegal robocalls, but for the Commission’s historical prohibition of provider-initiated call blocking. AT&T urged the Commission to adopt a safe harbor to insulate voice service providers that engage in call blocking from liability in the event the provider inadvertently blocks a legitimate call. [Comcast](#) said industry stakeholders have made substantial progress in developing and implementing solutions to mitigate illegal robocalls. It reported on its work in the SHAKEN/STIR testbeds, and indicated it plans to conduct network trials of SHAKEN/STIR prior to the end of 2018 and scale to fuller implementation during 2019. Comcast said it expects the Consumer and Governmental Affairs Bureau will be in a position to report that there has been significant progress made by industry, government, and consumers in combatting illegal robocalls, and that consumers can expect to see further reductions in these calls going forward, especially as SHAKEN/STIR is more widely adopted and implemented. [CTIA](#) said industry and the FCC are aggressively working to mitigate illegal robocalling, which is a challenge for the entire ecosystem, but solutions will require more than carrier action. It said efforts are promising, but with so much going on, it is premature to try to measure the effectiveness of these many activities. CTIA applauded the FCC and the FTC on recent high-profile enforcement actions and encouraged the agencies to continue pursuing illegal robocall schemes and to ensure that fines are paid, increasing the costs of illegal activity through a “whole of government” approach. CTIA also suggested the FCC and the FTC lead internationally to change norms and evangelize call authentication protocols, which need to be deployed globally. Replies are due August 20, 2018. [All comments available to date](#).
- Sens. Edward Markey (D-Mass.) and John Thune (R-S.D.) sent a [letter](#) to Chairman Pai on July 19, 2018, to outline an opportunity for FCC action on the proposed reassigned numbers database. They encouraged the Commission to consider a number of key features, including; comprehensiveness, accuracy, accessibility, security, efficiency, and a safe harbor. [press release](#)
- Comcast [met with](#) Advisors to Chairman Pai and Commissioner Carr on July 17, 2018, to reiterate its support for proposals to establish a centralized, comprehensive, Commission-designated database of

reassigned telephone numbers, and to encourage use of this resource by adopting a safe harbor from liability under the Telephone Consumer Protection Act for entities that reasonably rely on the database. It said given the absence of truly comprehensive and cost-effective tools for tracking number reassignments in the marketplace today, it urged the Commission to move expeditiously towards an Order adopting these proposed measures.

- The FCC published a [notice](#) in the Federal Register on July 23, 2018, announcing OMB has approved, for a period of three years, the information collection associated with rules adopted in the October 2017 [Order](#) allowing law enforcement authorities under specific circumstances to access blocked caller ID information when needed to identify and thwart threatening callers. The amendments to section 64.1601(d)(4)(ii) and (f) are effective August 22, 2018.
- The FCC published a [notice](#) in the Federal Register on July 23, 2018, to announce that OMB approved an information collection associated with the Business Data Services [Report and Order](#). The Order required that by August 1, 2020, price cap ILECs must remove all business data services that are no longer subject to price cap regulation from their interstate tariff and, by the same deadline, competitive LECs must remove all business data services from their interstate tariffs. The amendments to sections 61.201 and 61.203 are effective July 23, 2018.
- The FCC released the [Formal Complaint Proceedings Order](#) on July 18, 2018, which was adopted at its July 12, 2018 Open Meeting. The Order creates a uniform set of procedural rules for formal complaint proceedings delegated to the Enforcement Bureau and currently handled by its Market Disputes Resolution Division and Telecommunications Consumers Division. The Order streamlines and consolidates the procedural rules governing formal complaints against common carriers, formal complaints regarding pole attachments, and formal complaints concerning advanced communications services and equipment.
- The FCC [published](#) in the Federal Register the [FNPRM and NOI](#) on IP CTS, announcing comment and reply dates. Comments on the FNPRM are due September 17, 2018, and reply comments are due October 16, 2018. Comments on the NOI are due October 16, 2018, and reply comments are due November 15, 2018.
- The FCC published a [notice](#) in the Federal Register on July 17, 2018, announcing amendments to section 64.1120, adopted in the slamming and cramming [Report and Order](#), are effective August 16, 2018.
- The FCC published a [notice](#) in the Federal Register on July 17, 2018, announcing OMB approval of the information collection associated with the Commission's payphone compensation [rules](#). The amendment to section 64.1310(a)(3) is effective July 17, 2018.

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Upcoming Filing Dates

- July 23 - Replies due to oppositions to Verizon's [Application for Review](#) of the April 30, 2018 [Order on Reconsideration](#) that determined the Mobility Fund II challenge process would use a 400-meter buffer radius to assess challenges to areas initially deemed ineligible for MF-II support. [Public Notice](#)
- July 23 - Oppositions due to Petitions for Reconsideration of the Tribal OpEx Order filed by [Mescalero Apache Telecom](#) and [Sacred Wind Communications](#). Replies to oppositions are due August 2, 2018. [FR](#)
- July 23 - PRA comments due on an extension of a currently approved information collections associated with FCC Forms 470 and 471. [Notice](#)

- July 26 - Comments due on the [NPRM](#) on how best to structure the second stage of the Uniendo a Puerto Rico Fund and Connect USVI Fund. Replies are due Aug. 8, 2018. [FR notice Order](#)
- July 26 - Comments due on the state of mobile wireless competition. Reply comments are due August 16, 2018. [Public Notice](#)
- Aug. 2 - Replies due to oppositions to Petitions for Reconsideration of the Tribal OpEx Order filed by [Mescalero Apache Telecom](#) and [Sacred Wind Communications](#). [FR](#)
- Aug. 2 – Oppositions due to petitions for reconsideration of the Rural Call Completion [Order](#), filed by [NTCA](#) and [USTelecom](#). Replies are due August 13. [FR](#)
- Aug. 2 - Comments due on three petitions for ETC designation in the state of New York for the purpose of being eligible to receive Connect America Fund support as awarded by New York's New NY Broadband Program for state and CAF support. Replies are due August 13, 2018. [Public Notice](#)
- Aug. 3 - Replies due on the access stimulation [NPRM](#).
- Aug. 6 - Comments due on USTelecom's [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. Replies due September 5, 2018. [Public Notice](#), [Order](#)
- Aug. 8 - Comments due on the [NPRM](#) on how best to structure the second stage of the Uniendo a Puerto Rico Fund and Connect USVI Fund. [FR notice Order](#)
- Aug. 10 - Comments due on Q Link Wireless' Emergency [Petition](#) requesting the FCC issue an order directing USAC to implement application programming interfaces for the Lifeline National Verifier that permit ETCs to exchange information with USAC. Replies are due August 27, 2018. [Public Notice](#)
- Aug. 13 - Replies due on three petitions for ETC designation in the state of New York for the purpose of being eligible to receive Connect America Fund support as awarded by New York's New NY Broadband Program for state and CAF support. [Public Notice](#)
- Aug. 13 Replies due to petitions for reconsideration of the Rural Call Completion [Order](#), filed by [NTCA](#) and [USTelecom](#). [FR](#)
- Aug. 16 - Replies due on the state of mobile wireless competition. [Public Notice](#)
- Aug. 20 - Replies due on an FCC staff report on robocalling. The Commission seeks data and other information on the progress of robocalling initiatives among government, industry, and consumers, and data and other information, including notable trends in illegal robocalling, including for a baseline period of January 2018. [Public Notice](#)
- Aug. 20 - Comments due Verizon's [Petition for Declaratory Ruling](#) to confirm that if a LEC delivers a call to a two-stage dialing platform, including an IP-enabled platform, the LEC does not perform terminating switched access functions and cannot charge tariffed end office terminating switched access charges for that call. Reply comments are due September 5, 2018. [Public Notice](#)
- Aug. 27 - Replies due on Q Link Wireless' Emergency [Petition](#) requesting the FCC issue an order directing USAC to implement application programming interfaces for the Lifeline National Verifier that permit ETCs to exchange information with USAC. [Public Notice](#)
- Sept. 4 - Comments due on the [8YY Access Charge Reform FNPRM](#), in which the Commission proposes to migrate interstate and intrastate originating end office and tandem switching and transport charges for toll free (8YY) calls to bill-and-keep. Replies are due October 1, 2018. [FR](#)
- Sept. 5 - Replies due Verizon's [Petition for Declaratory Ruling](#) to confirm that if a LEC delivers a call to a two-stage dialing platform, including an IP-enabled platform, the LEC does not perform terminating

switched access functions and cannot charge tariffed end office terminating switched access charges for that call. [Public Notice](#)

- Sept. 17 - Comments due on IP CTS [FNPRM](#). Replies are due October 16, 2018. [FR](#)
- Oct. 1 - Replies due on the [8YY Access Charge Reform FNPRM](#), in which the Commission proposes to migrate interstate and intrastate originating end office and tandem switching and transport charges for toll free (8YY) calls to bill-and-keep. [FR](#)
- Oct. 16 - Replies due on IP CTS [FNPRM](#). [FR](#)
- Oct. 16 - Comments due on IP CTS [NOI](#). Replies are due November 15, 2018. [FR](#)
- Nov. 15 - Replies due on IP CTS [NOI](#). [FR](#)

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