

## NECA's Weekly Federal Regulatory Summary

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

### August 3, 2020 HIGHLIGHTS

- The FCC issued the [agenda](#) for its August 6, 2020 Open Meeting. The FCC will consider: a [report and order](#) to repeal certain TRS rules that are no longer needed in light of changes in technology and voice communications services; a [public notice](#) on adopting procedures for the C-band auction; a [report and order](#) on eliminating the radio duplication rule with regard to AM stations; a [report and order](#) on eliminating the common antenna siting rules for FM and TV broadcaster applicants and licensees; and a [report and order on remand and a fourth FNPRM](#) on inmate calling services.
- The Wireline Competition Bureau [announced](#) the new deadline for certain price cap and competitive ETCs who receive legacy high-cost support to file FCC Form 481 with USAC is August 7, 2020.
- The WCB [announced](#) the process by which price cap carriers currently receiving CAF Phase II support may elect to receive an additional year of such support.
- USTelecom, NTCA, and WTA sent a [letter](#) to Sen. Roger Wicker (R-Miss.), et al. to express concern with [proposed legislation](#) to eliminate the ETC designation for the RDOF auction.
- [Reply comments](#) were filed on the [NPRM](#) establishing the 5G fund for rural America.
- The USDA [announced](#) it is investing over \$3 million to provide broadband service in unserved and underserved rural areas in North Carolina and [investing](#) over \$13 million in Maryland.
- [Reply comments](#) were filed on refreshing the record in its 2012 USF contribution methodology [FNPRM](#) regarding one-way VoIP providers.
- The Enforcement Bureau [selected](#) USTelecom's Industry Traceback Group as the single consortium registered to conduct private-led traceback efforts to combat illegal robocalls.

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### Other Key Upcoming Dates

- Aug. 4 - Replies [due](#) on the [NPRM](#) on detariffing telephone access charges.

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## USF Reform

- The Wireline Competition Bureau issued a [public notice](#) on July 27, 2020, announcing the new deadline for certain price cap and competitive ETCs who receive legacy high-cost support to file FCC Form 481 with USAC is August 7, 2020. On June 26, 2020, the bureau released an [order](#) waiving, on its own motion, the July 1, 2020 annual certification requirement under section 54.313(j)(1) for these carriers because USAC's FCC Form 481 filing system did not fully incorporate the rule, adopted in a 2019 [order](#), eliminating several annual reporting requirements for these carriers. The bureau said USAC has now completed the changes to FCC Form 481 to incorporate the rule from the 2019 order.
- The Wireline Competition Bureau issued a [public notice](#) on July 29, 2020, announcing the process by which price cap carriers currently receiving CAF Phase II support based on the Connect America Cost Model may elect to receive an additional, seventh year of such support. Carriers have until September 28, 2020, to indicate on a state-by-state basis whether they will continue to receive model-based support for 2021. The bureau requires price cap carriers currently receiving CAM support to [submit their election letters](#). To receive a seventh year of model-based support, a carrier must submit a letter signed by an officer of the company confirming the carrier elects the model-based support amounts as specified in appendices A and B and committing to satisfy the specific service obligations associated with that amount. Additionally, carriers must file this letter with the Commission's Electronic Comment Filing System.
- USTelecom, NTCA, and WTA sent a [letter](#) to Sens. Roger Wicker (R-Miss.) and Maria Cantwell (D-Wash.) and Reps. Frank Pallone (D- N.J.) and Greg Walden (R- Ore.) on July 28, 2020, to express concern with [proposed legislation](#) to prospectively eliminate the ETC designation for certain broadband providers seeking to compete for funding through the FCC's Rural Digital Opportunity Fund auction. They asserted as proposed, the bill would serve no purpose other than to ensure some providers are immune from existing accountability and service obligations that their potential auction competitors have been subject to for decades, all while leaving those competitors subject to the obligations that come with ETC designation. [news release](#)
- Reply comments were filed on July 27, 2020, on the [NPRM](#) establishing the 5G fund for rural America. [NTCA](#) asserted its [proposal](#) quickly advances 5G deployment in the most deeply rural areas without running afoul of the arguments in favor of option B. [AT&T](#) suggested the Commission refrain from conducting the 5G fund auction until it has obtained granular mobile broadband coverage data through the DODC to identify eligible areas. [AT&T](#) also said the FCC should reject requests to set aside legacy support for small wireless carriers. [The Vermont DPS](#) recommended before Phase I of the 5G fund auction begins, the Commission ensure the accurate collection of data to target funding to where it is needed most. [FR all replies available](#)
- The Rural Wireless Association [spoke with](#) Office of Economics and Analytics staff on July 30, 2020, regarding comments on the 5G Fund for Rural America. RWA asserted the Phase 0 approach in Rural-Urban Commuting Area codes 5-10 could allow faster deployment of 5G in areas where no 5G exists or is likely to exist (absent support) and that Phase 1 could be deployed using Option A or Option B, but that Option B would take as much as two years longer and would include large areas of the country where 5G would likely be deployed without the need for universal service support.
- Northeast Iowa Telephone Company [spoke with](#) Chairman Pai's rural broadband advisor on July 23, 2020, regarding its [petition for declaratory ruling](#) on the definition of locations under the A-CAM for home-based businesses. NEIT inquired as to the status of resolving the locations issue and asserted the uncertainty could have a chilling effect on broadband deployment in areas hard hit by the pandemic
- Western Iowa Wireless filed a [petition for reconsideration](#) on July 27, 2020, of the Wireline Bureau's [public notice](#) that updated the list of census blocks deemed initially eligible for the RDOF Phase I auction. WIAW asserted the bureau denied its challenge to the eligibility for the RDOF auction of Iowa and Nebraska census blocks that WIAW serves with fixed voice and broadband service exceeding 25/3 Mbps. WIAW requested the bureau deem its entire service area ineligible

- PTI Pacifica, d/b/a IT&E, filed a [fourth supplement](#) on July 30, 2020, to its 2016 [request for a waiver](#) of section 54.1006(a) and an extension of the deadline by which it must complete construction of a mobile wireless network under Mobility Fund Phase I for three census tracts in the Commonwealth of the Northern Mariana Islands. PTI said it has completed construction of two of the three census tracts, the Rota and Marpi census tracts, but extenuating circumstances continue to delay PTI's completion of the network build out of the Tinian census tract, and requested an additional year, until August 16, 2021.

[Back to Highlights](#)

## ICC

- The Pricing Policy Division of the Wireline Competition Bureau issued an [order](#) on July 30, 2020, suspending Lingo Communications of Kentucky's Transmittal No. 3 proposing revisions to its interstate access service Tariff F.C.C. No. 1 to revise its originating and terminating end office switched access rates. The PPD said because questions of lawfulness exist regarding Lingo's proposed tariff revisions, it suspended the proposed revisions for one day and set for investigation the question of whether Lingo's proposed revisions comply with the 2011 USF/ICC Transformation Order, the Communications Act of 1934, as amended, and the Commission's rules.

## Broadband

- The USDA [announced](#) on July 27, 2020, it is investing more than \$3 million to provide broadband service in unserved and underserved rural areas in North Carolina. French Broad Electric Membership Corporation will use the funding to deploy an FTTP network. This investment is part of the \$100 million in grant funding made available for the ReConnect program through the CARES Act
- The USDA [announced](#) on July 31, 2020, it is investing more than \$13 million to provide broadband service in unserved and underserved rural areas in Maryland. Easton Utilities Commission will use the funding to deploy a FTTP network. This investment is part of the \$100 million in grant funding made available for the ReConnect Program through the CARES Act.
- The Wireline Competition Bureau issued a [declaratory ruling](#) on July 29, 2020, to address CTIA's [petition](#) for clarification of certain issues raised in the [2018 Wireline Infrastructure order](#). The bureau clarifies utilities may not impose categorical bans on pole access that do not require the utility to provide a reason for denying access specific to the pole or attachment in question. It also clarified while utilities and attachers have the flexibility to negotiate terms in their pole attachment agreements that differ from the requirements in the Commission's rules, a utility cannot use its negotiating leverage to require an attacher to give up rights to which the attacher is entitled under the rules without the attacher obtaining a corresponding benefit
- The Wireless Telecommunications Bureau issued a [memorandum opinion and order](#) on July 31, 2020, extending the 2.5 GHz Rural Tribal Priority Window by 30 days—to September 2, 2020, in light of the pandemic. [news release](#)
- Reps. Tom O'Halleran (D-Ariz.), Ben Ray Lujan (D-N.M.) and nine other members of Congress sent a [letter](#) to Chairman Pai on July 24, 2020, asking the FCC to extend the 2.5 GHz Rural Tribal Priority Window, currently scheduled to close on August 3, 2020, by no less than 180 days. They asserted an extension is appropriate given the burden the pandemic has had on tribal communities and is consistent with the Commission's [previous action](#) to delay Auctions 105 and 106
- Tara Sweeney, Assistant Secretary- Indian Affairs, U.S. Department of the Interior, sent a [letter](#) to Chairman Pai on July 24, 2020, to express support for requests from American Indian and Alaska Native communities to extend the 2.5 GHz Rural Tribal Priority Window, currently scheduled to close on August 3, 2020, to January 27, 2021, in response to the pandemic.

[Back to Highlights](#)

## Robocalls

- The Enforcement Bureau issued a [report and order](#) on July 27, 2020, announcing the selection of USTelecom's Industry Traceback Group as the single consortium registered to conduct private-led traceback efforts to combat illegal robocalls. The bureau found the group fulfills the statutory requirements outlined in the TRACED Act. [press release](#)
- The Enforcement Bureau issued a [public notice](#) on July 27, 2020, requesting information on the status of private-led traceback efforts of suspected robocalls. The bureau requested voice service providers and the registered consortium, USTelecom's Industry Traceback Group, to submit any information necessary for the Commission's annual report on the state of private-led efforts to trace back the origin of suspected unlawful robocalls for the period from July 27, 2020, to October 31, 2020. Submissions are due by November 15, 2020. [press release](#)
- The [FNPRM](#) seeking comment on additional steps to further protect consumers from robocalls and inform them about provider blocking efforts was published in the [Federal Register](#) on July 31, 2020. Comments are due August 31, 2020; replies are due September 29, 2020.
- The Consumer and Governmental Affairs Bureau issued [a public notice](#) on July 31, 2020, to announce comment and reply dates for the [FNPRM](#) on additional steps to further protect consumers from robocalls and inform them about provider blocking efforts. The FNPRM was published in the [Federal Register](#) on July 31, 2020. Comments are due August 31, 2020; replies are due September 29, 2020.
- The Consumer and Governmental Affairs Bureau issued a [public notice](#) on July 28, 2020, to confirm calls and text messages made by or on behalf of commercial labs, health insurers, physicians and pharmacies that, pursuant to guidance from federal, state or local government officials, communicate with individuals who have tested positive for COVID-19 to provide them with information regarding donating their plasma after recovering, fall within the emergency purposes exception to the Telephone Consumer Protection Act. The bureau said such calls during the pandemic do not require prior express consent to be lawful.
- Reply comments were filed on July 27, 2020, on the [FNPRM](#) on what rules the FCC needs to guide registration of a single consortium to conduct private-led efforts to trace back the origin of illegal robocalls. [INCOMPAS](#) suggested the Commission adopt identification standards for the ITG that are uniformly applied and based on objective criteria. It also said any provider-based blocking permitted by the Commission must be consistent with the recent Safe Harbor [order](#).
- Sorenson Communications and CaptionCall [spoke with](#) Consumer and Governmental Affairs Bureau, Wireline Competition Bureau, and Public Safety and Homeland Security Bureau staff on July 24, 2020, to ask the bureaus as the STIR/SHAKEN proceeding moves forward, to be sensitive to the potential for it to adversely affect the ability of all video relay service and some internet-captioned telephone service users to complete calls to the same extent as a hearing user. They urged the FCC to ensure procedures are developed and adopted to ensure STIR/SHAKEN does not interfere with the completion of TRS calls.

## Other Universal Service

- Reply comments were filed on July 27, 2020, on refreshing the record in its 2012 USF contribution methodology [FNPRM](#) regarding one-way VoIP providers. [NTCA](#) suggested the Commission include revenues derived from the provision of one-way VoIP services within the USF contribution base, followed promptly by a renewed effort to comprehensively reform the contributions mechanisms. [Alaska Communications](#) asserted while assessment of one-way VoIP services alone cannot substitute for more comprehensive reform, the inclusion of those services in the contribution base would establish an important principle upon which the Commission may build. It said the Commission should pursue comprehensive universal service contribution reform aimed at broadening the contribution base. [Microsoft](#) suggested the Commission refrain from assessing universal service contributions on one-way VoIP services and to instead pursue a comprehensive approach toward contribution reform. [magicJack VocalTec](#) asserted one-way VoIP revenues should not be subject to USF contribution

requirements. [The Von Coalition](#) asserted assessing one-way VoIP revenues would make no appreciable difference to the USF contribution base or the contribution factor. It urged the FCC to take a more holistic approach to reforming the system and work with stakeholders to figure out a more sustainable funding mechanism. [Twilio](#) claimed requiring one-way VoIP providers to contribute to the USF would not help close the contribution gap, and urged the Commission to undertake a comprehensive review of the existing USF contributions mechanism. [public notice](#) [all replies available](#)

- The FCC issued an [order](#) on July 31, 2020, denying petitions filed by [Network Communications International Corporation](#) and [Securus Technologies](#), which sought forbearance with respect to inmate calling service providers contributing to the USF.
- The Wireline Competition Bureau issued a [public notice](#) on July 31, 2020, to announce updated Lifeline Minimum Service Standards for speed and usage allowances for Lifeline-supported services as required by the 2016 Lifeline [order](#) for fixed and mobile broadband, effective December 1, 2020. The Bureau also announced the budget for federal USF support for the Lifeline program for calendar year 2021 will be \$2.4 billion.
- The FCC placed an [item on circulation](#) on July 30, 2020, entitled “Bridging the Digital Divide for Low-Income Consumers, Lifeline and Linkup Reform and Modernization.”
- The Wireline Competition Bureau released a [public notice](#) on July 31, 2020, granting, denying and dismissing various petitions related to actions taken by USAC on E-Rate, rural health care and contributions. The Bureau also granted Standing Rock’s [petition for waiver](#) of section 54.307(e)(7), to allow USAC to accept a late-filed FCC Form 525 (Competitive Carrier Line Count Report) for the period ending September 30, 2019. Petitions for reconsideration or applications for review of these decisions must be filed within 30 days of the public notice
- Reply comments were filed on July 27, 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. [NaLA](#) asserted the TPUC has failed to meet the core commitments it made to the Commission in its NLAD opt-out certification and provide a system at least as robust as the processes adopted by the Commission for the NLAD. [TracFone](#) suggested rather than revoke the PUCT’s NLAD opt-out status, the FCC clarify ETCs may rely on the LIDA’s API review process in addition to the EOM report to calculate the number of qualifying low-income customers for whom they may lawfully claim USF support in accordance with the Snapshot Rule. [T-Mobile](#) proposed a process it says will help ensure Texas Lifeline subscriber counts are reported and the associated federal Lifeline support is paid. [public notice](#)
- TracFone Wireless filed a [letter](#) on July 27, 2020, in support of the National Lifeline Association’s July 8, 2020 [letter](#) requesting the Commission extend its COVID-19 waivers of certain Lifeline rules and requirements and issue a waiver of the increase to the Lifeline mobile broadband minimum service standard.
- TruConnect [spoke with](#) Commissioner O’Rielly on July 23, 2020, to suggest the FCC renew the waivers of the Lifeline recertification, reverification usage and certain general enrollment requirements, which are due to expire August 31, 2020. TruConnect asserted renewing the waivers will keep Americans connected during the pandemic.
- Smith Bagley filed a [letter](#) on July 30, 2020, to provide an update on the ongoing impacts of the pandemic on Tribal lands in SBI’s service area. It asserted the continuing crisis justifies a further extension of the waivers of non-usage, recertification, and other Lifeline requirements that would risk mass loss of service if strictly enforce.
- The National Lifeline Association [spoke with](#) advisors to Commissioners Starks, O’Rielly and Rosenworcel on July 27 and 28, 2020, to urge the Commission to extend the Lifeline COVID-19 involuntary de-enrollment waivers through at least the end of the year, and also extend the current waiver and leave the mobile broadband minimum at 3 GB until the Commission can properly assess and act on pending reconsideration petitions and issue the State of the Lifeline Marketplace Report.

- T-Mobile filed a [letter](#) on July 29, 2020, to urge the Commission to waive any scheduled increase in the Lifeline mobile broadband minimum service standards and said establishing a reasonable and sustainable mobile broadband MSS well in advance of December 1, 2020 will help ensure the continued availability of critical, affordable Lifeline service.
- [Alaska Communications](#) and [GCI](#) filed applications for review on July 30, 2020, of the Wireline Competition Bureau's June 30, 2020, [letter](#) that provided direction on how to administer the rural health care support mechanism and treat services and data when identifying rural and urban rates for the telecommunications program and to assist with creation and operation of the urban and rural rates database by July 1, 2020, for funding year 2021 applications.
- An FCC [notice](#) was published in the Federal Register on July 30, 2020, announcing the Office of Management and Budget has approved, for a period of three years, an information collection associated with the rules for the Connect America Fund contained in the Uniendo a Puerto Rico Fund and Connect USVI Fund [order](#). The amendments to sections 54.1505 (application process), 54.1508 (letter of credit) and 54.1515 (disaster preparation and response measures) are effective July 30, 2020. The FCC estimated approximately 20 parties will apply and approximately 10 will be selected as winning applicants for stage 2 fixed support
- Blackburn Technologies [spoke with](#) Wireline Competition Bureau staff on July 30, 2020, regarding its [petition](#) seeking a waiver of section 54.1505(a) (stage 2 fixed support application process). Blackburn discussed its network infrastructure and capabilities, provided an update regarding the status of its pending ETC designation application in Puerto Rico, and explained its qualifications to receive support from the fund
- Siyeh Communications [spoke with](#) Chairman Pai's rural broadband advisor on July 29, 2020, regarding its joint [petition](#) for a study area waiver on the transfer of the Browning, Montana exchange from 3 Rivers to SiyCom. Siyeh urged the FCC to promptly decide the proceeding, asserting that the Blackfeet Tribe has expressed concern regarding broadband service to residents in the Browning Exchange during the pandemic and the impending deadline of a Bureau of Indian Affairs guarantee of a loan to Siyeh Communications at the end of September.

[Back to Highlights](#)

## Misc.

- The FCC issued the [agenda](#) for its August 6, 2020 Open Meeting on July 30, 2020. The FCC will consider: a [public notice](#) that would adopt procedures for the auction of new flexible-use overlay licenses in the 3.7–3.98 GHz band (Auction 107) for 5G, the Internet of Things, and other advanced wireless services; a [report and order](#) that would eliminate the radio duplication rule with regard to AM stations and retain the rule for FM stations; a [report and order](#) that would eliminate the common antenna siting rules for FM and TV broadcaster applicants and licensees; a [report and order](#) to repeal certain TRS rules that are no longer needed in light of changes in technology and voice communications services; and a [report and order on remand and a fourth FNPRM](#) that would respond to remands by the U.S. Court of Appeals for the District of Columbia Circuit and propose to comprehensively reform rates and charges for the inmate calling services within the Commission's jurisdiction.
- Sen. Jim Inhofe (R-Okla.) [announced](#) on July 28, 2020, he placed a hold on the nomination of Commissioner O'Rielly to be an FCC commissioner until O'Rielly publicly commits to vote to overturn the April 2020 [Ligado order](#).
- Uniti Fiber filed a [letter](#) on July 28, 2020, asserting CLECs continue to be impaired without unbundled network element access to dark fiber interoffice transport. Uniti Fiber said if the Commission grants any relief, it should grandfather existing UNE dark fiber transport as proposed by [INCOMPAS](#).
- INCOMPAS filed a [letter](#) on July 24, 2020, in response to recent ex parte filings by [USTelecom](#), [AT&T](#) and [CenturyLink](#) on unbundled dark fiber transport. INCOMPAS asserted viable commercial

alternatives to unbundled dark fiber transport are not available in many key routes both between and within metro areas, and the ability of a reasonably efficient provider to self-deploy fiber necessary for a complete, competitive metro ring cannot simply be assumed based on the presence of any fiber within a half-mile of a given wire center. It said the Commission should not forbear from the existing dark fiber transport unbundling rule.

- TPx Communications [spoke with](#) legal advisors to Commissioners Rosenworcel and Starks, and [Wireline Competition Bureau staff](#) on July 22 and 24, 2020, regarding AT&T's planned 20% increase in term plans and month-to-month rates for DS1, DS3, SONET Point-to-Point, LightGate and Wavelength Channel Special Access and Business Data Services. TPx asserted although the Commission relaxed regulation of BDS rates, it defies the laws of economics that a carrier in a competitive market can raise its rates on 30 days' notice by 20% for supposedly competitive service.
- WorldNet Telecommunications [spoke with](#) legal advisors to Commissioners Rosenworcel and Carr on July 29 and 30, 2020, to express opposition to the proposals in the [NPRM](#) to eliminate and/or further restrict access to unbundled network elements, specifically as they relate to Puerto Rico. WorldNet asserted the unique circumstances presented in Puerto Rico and the potential for stranding significant amounts of competitive facilities investment weigh heavily in favor of not applying the FCC's proposal in Puerto Rico or, at a minimum, grandfathering existing dark fiber services and/or deferring the implementation of the remaining UNEs under consideration at least five years.
- Huawei filed an [application for review](#) and ZTE filed a [petition for reconsideration](#) on July 30, 2020, of the [orders \(order\)](#) formally designated them as covered companies for the purposes of the November 2019 [ban](#) on the use of universal service support to purchase equipment or services from companies posing a national security threat. Huawei asserted, among other things, the PSHSB had no authority to enter the final designation or even conduct the proceedings. ZTE claimed the PSHSB erred in its overly-broad application of the supply chain security order.
- CCA, Viaero Wireless, Ericsson, Commnet Wireless/ATN International, and Triangle Communications [spoke with](#) advisors to Chairman Pai and Commissioners O'Rielly, Carr and Rosenworcel on July 27, 28, and 29, 2020, regarding implementation of the Secure Networks Act. They urged the Commission to: adopt a mechanism by which carriers can obtain up-front approval of their transition plans, establish a payment schedule and clear milestones for payments so that carriers know when they will be able to obtain payments to facilitate the transition, and give all parties clear guidance on how it will implement both blanket and individual waivers.
- China Telecom filed a [letter](#) on July 27, 2020, objecting to a [request](#) from the Department of Justice for access to confidential exhibits CTA submitted [in response](#) to the FCC's [order to show cause](#) on why the FCC should not revoke its domestic and international section authorizations enabling them to operate in the United States.
- In addition to comments listed in a previous edition of *REGScan*, comments were filed on July 24, 2020, 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. [Verizon](#) asserted petitioners' proposed reforms further the Commission's efforts to eliminate unnecessary regulations while allowing Commission and industry resources to be used more efficiently and effectively. [AT&T](#) claimed the proposed reforms can help the Commission reduce the regulatory burdens associated with these filings for both licensees and Commission staff. The [Satellite Industry Association](#) and the [National Association of Broadcasters](#) also filed in support of the petition. Replies are due August 10, 2020. [public notice](#) | [all comments available](#).
- The Wireline Competition Bureau issued a [public notice](#) on July 27, 2020, announcing 3 Billionaires Corp. filed an application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. Comments are due August 11, 2020.
- Comments were filed on iconectiv's [petition](#) asking the FCC to conduct a competitive procurement process to select the toll-free numbering administrator. [AT&T](#) supported the petition, and asserted the TFNA's use of a tariff is an anomaly, as the Commission uses transparent, competitive bidding and

contracts for all other numbering administrators that the Commission oversees, specifically number administration, portability, and pooling, and the Reassigned Numbers Database. [USTelecom](#) supported the petition, claiming introducing competitive bidding into the TFNA selection process can drive efficiency and lower service fees, as has been the case with a similar transition in other number administrator contracts. [ATIS](#) said it does not object to the competitive concept behind the proposed use of a competitive procurement process to select the TFNA, but urged the Commission to ensure any new rules do not significantly interfere with or require changes to the way in which providers interface with the TFNA and allows service providers to maintain existing levels of service, security, functionality, and does not require costly changes. Replies are due August 13, 2020. [all comments available](#) | [public notice](#).

- Somos [spoke with](#) Commissioner Carr's legal advisor on July 23, 2020, regarding the [public notice](#) seeking comment on iconectiv's [petition](#) on the procurement process to select the toll-free numbering administrator. Somos said if the Commission chooses to consider whether to employ a different process for selecting the TFNA and regulating the provision of the TFNA's services to replace the tariff, it must issue an NPRM. Somos [also spoke with](#) Commissioner Rosenworcel and Starks' legal advisors to discuss the same issues.

[Back to Highlights](#)

## Upcoming Filing Dates

- 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](#) | [FR](#)
- Aug. 6 - Reply comments due on the on adjustment factor values for the [5G Fund](#). [public notice](#)
- 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. 11 - Comments due on 3 Billionaires' application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. [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. 19 - Comments due on NCTA's [petition](#) requesting the FCC clarify it is unjust and unreasonable for pole owners to shift the entire cost of a pole replacement to a new attacher. Replies due September 3. [public notice](#)
- Aug. 20 - Replies due on whether the 515 proceedings should be terminated as dormant. [public notice](#) | [FR](#)
- Aug. 20 - Comments due on the proposed E-rate eligible services list for funding year 2021. Replies are due September 4, 2020. [public notice](#)
- Aug. 31 - PRA comments due on a new information collection on the CAF II eligible locations adjustment process. [notice](#)



- Aug. 31 - Comments due on additional steps to further protect consumers from robocalls and inform them about provider blocking efforts. Replies due September 29. [FNPRM](#) | [FR](#)
- Sept. 3 - Replies due on NCTA's [petition](#) requesting the FCC clarify it is unjust and unreasonable for pole owners to shift the entire cost of a pole replacement to a new attacher. [public notice](#)
- Sept. 4 - Replies due on the proposed E-rate eligible services list for funding year 2021. [public 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](#)
- Sept. 21 - PRA comments due on a revision of a currently approved collection associated with Part 32 accounting requirements. [FR](#)
- Sept. 29 - Replies due on additional steps to further protect consumers from robocalls and inform them about provider blocking efforts. [FNPRM](#) | [FR](#)

[Back to Highlights](#)

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