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August 13, 2018 HIGHLIGHTS

- The FCC published [a notice](#) in the Federal Register to announce OMB approval of the revised information collection pursuant to the July 7, 2017 [ETC Reporting Streamlining Order](#), which streamlined the annual reporting requirements for ETCs that receive high-cost USF support.
- The FCC placed on [circulation](#) items on: the CAF; Universal Service Reform Mobility Fund; Rural Call Completion; and 2018 Regulatory Fees.
- TDS Telecom, ITTA, et al. [urged](#) the FCC to fully fund separate budgets for the A-CAM program and legacy support mechanisms. GVNW, Home Telephone, et al. [discussed](#) the proposal to change the current competitive overlap rules on high-cost USF support for rate-of-return companies.
- Grand River Mutual Telephone and JSI [discussed](#) Grand River's Petition for Reconsideration that seeks A-CAM funding for 747 rural locations that were precluded from receiving any support due to an inadvertent clerical error in GRM's June 2015 FCC Form 477 data.
- [Reply comments were filed](#) on the [NPRM](#) on access stimulation.
- The FCC issued the [14th Section 706 Broadband Deployment Report Notice of Inquiry](#) to assess the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion. The FCC seeks comment on, among other things, maintaining the current speed benchmark of 25/3 for fixed broadband and to what extent fixed and mobile services of similar functionality are substitutes for each other, Comments are due September 10, 2018; replies due September 24, 2018.
- [Comments were filed](#) on USTelecom's [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. Replies are due September 5, 2018. [Order](#)
- The FCC [granted](#) a section 214 [application](#) for transfer of control of Hospers Telephone to Mutual Telephone.
- The FCC [seeks to refresh](#) the record in response to the Call Blocking NPRM and NOI on additional criteria voice providers could use to identify and block illegal calls. Comments are due September 24, 2018; replies due October 8, 2018.
- The D.C. Circuit Court [stayed](#) the FCC's 2017 Lifeline [Order](#), pending judicial review.
- The FCC [announced](#) Stage 1 funding allocations for qualifying providers from the Uniendo a Puerto Rico Fund and the Connect USVI Fund. [Reply comments were filed](#) on the [NPRM](#) on how best to structure the second stage of the Uniendo a Puerto Rico Fund and Connect USVI Fund.

Other Key Upcoming Dates

- Aug. 13 - Replies [due](#) to petitions for reconsideration of the Rural Call Completion [Order](#) filed by [NTCA](#) and [USTelecom](#).
- Aug. 17 - Comments due on the state of fixed broadband competition. [Public Notice](#)
- Aug. 20 - Replies due on an FCC staff report on robocalling. [Public Notice](#)
- Aug. 20 - Comments due on Verizon's [Petition for Declaratory Ruling](#) on terminating switched access charges. Replies are due September 5, 2018. [Public Notice](#)
- Aug. 27 - Comments due on the [FNPRM](#) that proposes to extend the separations freeze for 15 years. Replies are due September 10, 2018. [FR](#)

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USF Reform

- The FCC published [a notice](#) in the Federal Register on August 8, 2018, to announce OMB approval of a revised information collection pursuant to the July 7, 2017 [ETC Reporting Streamlining Order](#). The Order streamlined the annual reporting requirements for ETCs that receive high-cost USF support by eliminating reporting rules regarding network outage information, unfulfilled service requests, the number of complaints received by an ETC per 1,000 subscribers for both voice and broadband services, pricing for voice and broadband services, service quality certification, and duplicate filing of the FCC Form 481.
- The Commission placed three items on [circulation](#) on August 3, 2018: an item on the Connect America Fund; Universal Service Reform Mobility Fund; an item on Rural Call Completion; and an item on Regulatory Fees for Fiscal Year 2018.
- Chairman Pai sent a [letter](#) to Sen. Michael F. Bennet (D-Colo.) on August 3, 2018, in response to his letter on transparency of the CAF Phase II auction and his request that the next round of CAF-II funding ensure that all providers capable of delivering broadband in Colorado are eligible to compete for these funds on a level playing field. Pai said on June 25, 2018, the FCC announced that 220 applicants had qualified to bid in the auction, noting qualified bidders include small and large telecommunications companies, cable companies, wireless ISPs, and electric co-operatives. Pai said, however, to preserve the integrity of the auction, additional information about the bidders, including the states and service tiers for which they are eligible to bid, will remain confidential until after the auction.
- TDS Telecom, Great Plains Communications, Hargray Communications, and ITTA [met separately with](#) Chairman Pai's Advisor and Wireline Competition Bureau staff on August 7, 2018, to urge the Commission to fully fund separate budgets for the A-CAM program and legacy support mechanisms. They claimed funding A-CAM participants at \$200 per eligible location would require approximately \$65 million per year, while fully funding the legacy program would entail approximately \$248 million this year and claimed this would have led to an aggregate eight cent increase in average monthly USF contributions for residential consumers in 2017. They also discussed modifications to the legacy support mechanism proposed in the NPRM, suggesting the Commission adopt a reasonable threshold level of annual support for legacy carriers that would not be subject to a budget cap. They reiterated ITTA's support for the NPRM's proposal to modify the budget control mechanism to use only a pro rata reduction applied as necessary and no longer include a per-line reduction aspect.
- GVNW, Home Telephone, Harrisonville Telephone, Egyptian Telephone Cooperative, Wabash Communications, and Madison Telephone [spoke with](#) Wireline Competition Bureau staff on August 8, 2018, to discuss the proposal to change the current competitive overlap rules on high-cost USF support for rate-of-return companies. They suggested the Commission clarify that if a study area is identified as being 100 percent overlapped based on the FCC Form 477 and if the unsubsidized competitor(s) cited does not file supporting data in the initial comment round of the proceeding, no further action need be taken by the incumbent and the lack of the filing of such data shall automatically trigger a final determination by the Commission that the tentatively identified 100 percent overlap is null and void for the purpose of that proceeding. They also suggested if the unsubsidized provider(s) does file in the initial comment round, the incumbent must have sufficient time to develop sufficient and reliable data to rebut any assertions made, and the Commission should emphasize to unsubsidized providers that if they discover, or are informed, that their FCC Form 477 filing is not accurate, they are obliged to file a correction.
- Grand River Mutual Telephone and JSI [spoke with](#) Chairman Pai's Advisor on August 3, 2018, regarding Grand River Mutual's Petition for Reconsideration that seeks A-CAM funding for 747 rural locations that were precluded from receiving any support due to an inadvertent clerical error in GRM's June 2015 FCC Form 477 data. They discussed the fact that not all eligible carriers elected additional A-CAM support when revised offers were made and urged the FCC to use the remaining balance plus additional funds, if necessary, for the "orphaned" locations. They suggested in the event the FCC does

not use those funds, they urged additional funding be made available to these locations as the FCC considers increasing the budget for rate-of-return carriers.

- The Rural Wireless Association filed an [Informal Request for Commission Action](#) on August 3, 2018, asking the Commission to investigate the 4G LTE coverage claimed by Verizon and require re-filing of Verizon's data to correct its overstated coverage for the Mobility Fund II eligibility map. RWA said it continues to receive reports from its members that the cost of participating in the MF II challenge process is requiring hundreds of hours of time and hundreds of thousands of dollars to disprove Verizon's overstated coverage. RWA argued a Commission investigation into the 4G LTE coverage claimed by Verizon, and a determination that Verizon must re-file where coverage data is inaccurate, could save prospective challengers millions of dollars apiece, and will open up the challenge process to numerous additional challengers who are currently deterred from participating in the process by the enormous cost involved.
- The Auctions and Spectrum Division issued an [Order](#) on August 9, 2018, granting the Mississippi Farm Bureau Federation (MFBF) a [waiver](#) to participate as a challenger in the Mobility Fund Phase II challenge process, subject to MFBF's compliance with its representations and with the requirements of the MF-II challenge process. It instructed USAC to grant access to the challenge process portal to the users identified in MFBF's Petition for Waiver.
- PTI Pacifica, d/b/a IT&E, filed a [supplement](#) to its [request for a waiver](#) on August 8, 2018, 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. It requests an additional year, until August 1, 2019.

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ICC

- Reply comments were filed August 3, 2018, on the [NPRM](#) that proposed to give access stimulating LECs two choices for receiving calls: to be financially responsible for the delivery of calls to their networks; or to accept direct connections from long-distance carriers seeking to terminate telephone calls to the LECs or from intermediate access providers of the long-distance carriers' choosing. [South Dakota Network](#) said the Commission should find that access stimulation is an unjust and unreasonable practice and, as such, is prohibited. It also said the Commission should reject requests to impose new regulations on carriers that do not engage in access stimulation or access arbitrage. [AT&T](#) said the only parties that opposed the Commission taking any action on access stimulation were the access stimulating LECs, and it urged the Commission to proceed with its proposal to place the financial responsibility on an access-stimulating LEC so it, rather than IXCs, pays for the delivery of calls to its end office or the functional equivalent. AT&T suggested the Commission also make clear that CEA service providers are CLECs for purposes of the Commission's traffic pumping rules. AT&T noted the NPRM appropriately raised concerns regarding other arbitrage schemes involving mileage pumping and daisy chaining, and said a direct connect requirement, similar to the one proposed by CenturyLink, would put an end to these non-access stimulation arbitrage schemes. [CenturyLink](#) said the Commission should adopt the NTCA et al. framework for terminating access stimulation call flows and the CenturyLink framework for all other terminating access contexts. It suggested the Commission disregard unsubstantiated claims that these proposals would be overly difficult to implement, claiming it demonstrated in its initial comments that both could be implemented relatively easily. CenturyLink also claimed it is clear following the initial comments that the Commission has legal authority to adopt the NTCA et al. proposal and the CenturyLink proposal. [All reply comments available to date.](#)
- CenturyLink, Cox Communications, Windstream, and Frontier [met with](#) FCC Office of General Counsel staff on August 7, 2018, to reiterate support for the pending [Petition for Declaratory Ruling](#) filed by the LEC Coalition on November 10, 2014, asking the FCC to confirm that the "intraMTA rule" does not apply to LEC charges billed to an IXC when the IXC terminates traffic to or receives traffic from a LEC via tariffed switched access services. They said the U.S. District Court for the Northern District of

Texas has resolved key questions of law underlying the Petition in a manner that upholds the positions advanced by the LEC Coalition. They urged the Commission to refrain from any action inconsistent with the court's findings, and discussed whether it would be beneficial for the Commission to provide further guidance on mechanisms that might be used on a prospective basis to allow IXCs to route commingled traffic through Feature Group D trunks, while treating intraMTA wireless traffic as exempt from access charges.

- Verizon [met with](#) Wireline Competition Bureau staff on August 2, 2018, to urge the Commission to deny CenturyLink's [Petition](#) and reaffirm that a LEC cannot assess tariffed end-office switching charges on over-the-top VoIP traffic. Verizon also urged the Commission to reaffirm that a carrier-customer cannot violate the Communications Act by withholding payment of tariffed charges, and suggested the Commission clarify that the contrary federal court decisions are inconsistent with decades of Commission precedent.

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Open Internet

- Chairman Pai sent letters to [Sen. Claire McCaskill](#) (D-Mo.) and [Rep. Jeff Fortenberry](#) (R-Neb.) on August 3, 2018, in response to their December 2017 letters that expressed concerns with proposed net neutrality actions. Pai asserted returning to the legal framework that governed the internet from 1996 until 2015 will not destroy the internet, and claimed returning to the light-touch legal Title I framework will help consumers and promote competition.

Broadband

- The FCC issued the [14th Broadband Deployment Report Notice of Inquiry](#) on August 9, 2018, initiating the next annual assessment of the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion. The FCC, among other things, proposes to maintain the current speed benchmark of 25/3 for fixed broadband, and to conduct an evaluation of fixed and mobile services using the same four categories for evaluation that were presented in the [February 2018 Report](#): fixed services only; mobile LTE services only; fixed *and* mobile LTE services; and fixed *or* mobile LTE services. The FCC also seeks comment on whether and to what extent fixed and mobile services of similar functionality are substitutes for each other. Comments are due September 10, 2018; replies are due September 24, 2018.
- The FCC issued a [Public Notice](#) on August 9, 2018, seeking nominations for membership on a new Disaster Response and Recovery Working Group of the Broadband Deployment Advisory Committee. This new working group will assist the BDAC in providing advice and recommendations to the Commission on steps that can be taken to improve disaster preparation, response, and recovery for broadband infrastructure. Nominations for this Working Group are due September 7, 2018.
- Comments were filed on August 6, 2018, on USTelecom's [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. [Verizon](#) supported USTelecom's Petition and supported the transition plan of USTelecom and some of the largest buyers and sellers of UNEs. Verizon asserted the outdated unbundling, resale, and long-distance regulations are not only unnecessary to protect competition, but retaining them threatens to have the opposite effect. It also asserted these regulations are applied unevenly and single out ILECs, even though cable operators also have widespread incumbent networks that are being used to provide voice and data services to residential and business customers. The [Penn. PUC](#) opposed USTelecom's Petition, asserting there is insufficient granularity in the data submitted by the Petitioners to justify its forbearance request regarding the ILEC-specific unbundling and resale statutory mandates. It expressed concern about the adverse impact that any FCC decision will have on competition in Pennsylvania. [Public Knowledge, et al](#) asserted USTelecom's Petition is not complete as filed and has not demonstrated grounds for nationwide forbearance. They said contrary to the claims made in the USTelecom Petition, sections 251(c)(3)-(4), 271(c)(2)(B)(III), and 272(e)(1), and 64.1903 of the FCC's rules are some of the primary reasons why competition in the

switched voice and business data services market exists in many locations across the United States. The [Michigan PSC](#) asserted a grant of nationwide forbearance would be overly broad, harmful to competition, and not in the public interest. The MPSC also urged the Commission to deny forbearance from the section 271(c)(2)(B)(iii) requirement for nondiscriminatory access, but took no position on USTelecom's request for forbearance from section 271(E)(1). The [Internet Innovation Alliance](#) said USTelecom's Petition offers ample evidence with respect to each of the regulations for which it seeks forbearance and claimed the Commission's actions in the BDS Order offer further evidence in favor of forbearance. [Full Service Network](#) opposed USTelecom's Petition regarding Category 1 (ILEC unbundling and resale mandates in sections 251(c)(3) and (4)) and Category 2 (RBOC section 272 time interval requirements for nondiscriminatory treatment of affiliates and non-affiliates regarding requests for service, and the long distance separate affiliate requirement for independent ILECs in section 64.1903). [All comments available to date](#). Replies are due September 5, 2018. [Order](#)

- Chairman Pai sent [letters](#) to Sens. Tom Udall (D-N.M.), Tina Smith (D-N.M.), and Maria Cantwell (D-Wash.), and Rep. Ben Ray Lujan (D-N.M.) on August 3, 2018, in response to their request for the FCC to delay its vote on the [Second Report and Order](#) on wireless infrastructure while the FCC conducts another round of tribal consultation. Pai said in developing the new rules, the Commission engaged extensively with Tribal Nations, inter-Tribal organizations, and state and local historic preservation officers.
- AT&T filed a [letter](#) on August 6, 2018, on the [Declaratory Ruling](#) released on August 3, 2018, which concludes section 253(a) prohibits state and local moratoria on telecommunications facilities deployment. AT&T urged the Commission to further use its authority to interpret sections 253 and 332(c)(7) to clarify the types of municipal regulations that "have the effect of prohibiting" the provision of wireless service, primarily as they affect small cell deployments. AT&T claimed many municipalities continue to impose unreasonable barriers that would delay or discourage carriers from upgrading networks with more capacity and from building 5G infrastructure, and asserted non-cost-based fees to access the ROW and/or municipally-owned ROW structures are the highest barrier to small cell deployments. It said the Commission should clarify that the portion of such fees in excess of costs violates section 253.
- Public Knowledge filed a [Petition for Reconsideration](#) on August 8, 2018, of the section 214(a) discontinuance rules promulgated in the June 8, 2018 [Report and Order](#). It also asked the FCC to hold the Order in abeyance until the Ninth Circuit issues a judgment in the pending litigation involving the interpretation of section 214. Public Knowledge asserted the Commission should eliminate the alternative options test and rely solely on the adequate replacement test to determine whether to grant applications for discontinuance, and to reinstate the 180-day comment period for customers of discontinued services.
- American Tower filed a [letter](#) on August 10, 2018, on network infrastructure and siting rules. It suggested the FCC establish a 60-day shot clock for local government reviews of small cells on an existing or replacement pole in a public right-of-way and for collocations governed by section 332(c)(7), and find that modest expansions of macro cell site compounds to accommodate collocations do not constitute a substantial increase in size or a substantial change, consistent with the treatment of compound expansions for replacement poles.
- The Association of American Railroads [met with](#) Commissioner Carr's Legal Advisor on August 6, 2018, to discuss the Commission's efforts to remove barriers to wireless and wireline infrastructure deployment. AAR supported the Commission's wireless infrastructure efforts, including the March 30, 2018 [Second Report & Order](#) that covers Positive Train Control and non-PTC deployments and streamlines section 106 review. AAR asserted section 253, however, does not provide statutory authority to regulate railroad ROW access or the bilateral, private negotiations between railroads and telecommunications providers.

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Universal Service

- The D.C. Circuit Court released an [Order](#) on August 10, 2018, granting the National Lifeline Association, et al.'s motion to stay the FCC's 2017 Lifeline [Order](#) pending judicial review. The court ruled the Order will be stayed pending further order of the court, insofar as it purports to limit eligibility for the Tribal Lifeline enhanced subsidy to "facilities-based" service providers and to limit eligibility for that program to rural areas.
- Chairman Pai sent [letters](#) to Sens. Ron Wyden (D-Ore.) and Jeff Merkley (D-Ore.) on August 3, 2018, in response to their letter suggesting the Commission increase the Rural Health Care Funding cap. Pai said the recent Report and Order takes immediate action to increase funding for rural hospitals and health clinics by 43 percent, or \$171 million per year, and said this increase, along with future inflation adjustments and a mechanism to carry forward unused funding from previous years, will help ensure that rural health care providers get the connectivity they need to better serve patients.
- The Wireline Competition Bureau issued a [Public Notice](#) on August 7, 2018, to announce Stage 1 funding allocations to qualifying providers for the Uniendo a Puerto Rico Fund and the Connect USVI Fund. The Bureau said allocations in Attachments A and B are based on the subscriber counts certified by election filings and validated by the providers' FCC Form 477 data. It said as directed in the PR-USVI Fund Order, it allocated 60 percent of the funding available to fixed network operators and forty percent to mobile network operators in each of the territories. The Bureau also directed USAC to disburse the allocated funding to the authorized ETCs from the high-cost cash account.
- Reply comments were filed on August 8, 2018, on the [NPRM](#) on how best to structure the second stage of the Uniendo a Puerto Rico Fund and Connect USVI Fund. The [Government of the U.S. Virgin Islands](#) agreed with Viya that the Commission should require Stage 2 funding recipients to provide access to their infrastructure to other entities on the condition that the requesting parties also provide reciprocal access to their infrastructure to Stage 2 funding recipients. [Broadband VI](#) said the FCC should conduct a competitive bidding application process open to broadband providers that were serving customers as of June 30, 2017. It also said the FCC should reject AT&T's proposal to shorten Stage 2 to three years and add a Stage 3. [Hughes Network Systems](#) said the Commission should adopt bidding criteria that clearly permit the participation of all technologies, including satellite, in its proposed USF program. It also suggested the Commission adopt a participation cut-off date that reflects demonstrated deployment capabilities on the territories, latency requirements that are technology neutral, and award funding based on objective, technology neutral procedures. [Puerto Rico Telephone Company](#) said the Commission should not limit use of Stage 2 funds to areas unserved by an unsubsidized competitor, arguing by providing flexibility on where the funds are used, the Commission will permit funding recipients to appropriately leverage remaining network plant to better use the limited Uniendo Fund dollars. [Viya](#) said allocating Stage 2 fixed-network funding in the USVI to Viya best achieves the Commission's goals for the Connect USVI Fund, arguing a competitive process for allocating Stage 2 fixed-network support in the USVI would undermine the Commission's goals. [Liberty Cablevision of Puerto Rico](#) asserted a substantial adjustment to the Commission's funding allocation methodology is needed, suggesting the Commission significantly reduce the high-cost funding benchmark far beyond the 25 percent adjustment suggested in the NPRM. [Order. All replies available to date.](#)
- Sprint filed [comments](#) on August 10, 2018, 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. Sprint urged the Commission to grant Q Link's Petition, saying implementation of APIs will make the NV more efficient and effective and thus will improve the Lifeline program. Replies are due August 27, 2018. [Public Notice](#)
- TracFone Wireless filed an emergency [Petition](#) on August 9, 2018, to urge the Commission to direct USAC to expedite efforts to obtain access to key databases and postpone including a hard launch of the National Verifier until access to such key databases has been secured. TracFone said, in the alternative, the Commission should direct USAC to accept documentation produced through third

parties' automated access to state databases as part of the Verifier's manual process, including managed care organizations letterhead proof of Medicaid eligibility.

- Huawei Technologies filed [ex parte comments](#) on August 6, 2018, to discuss the [NPRM](#) on supply chain security and to respond to TIA's [comments](#) and [reply comments](#) on the NPRM. Huawei claimed the reply comments confirm that the Commission's proposed national security blacklist rule is legally infirm, is arbitrary and capricious, has costs that outweigh any purported benefits, is procedurally deficient, and lacks any factual foundation. Huawei asserted only TIA tried to defend the Commission's proposal in any detail, but claimed its reply misrepresents the record and is full of distortions and unproven accusations against Huawei.
- Nokia filed a [letter](#) on August 9, 2018, in the supply chain security proceeding to respond to allegations in Huawei Technologies' [letter](#) regarding Nokia's business practices in China. Nokia argued that Huawei's claims that it has "deep ties" to the Chinese Government are false, and asserted it has never been alleged that Nokia is influenced inappropriately by any government anywhere, nor has it been charged with or even alleged to have participated in cyber espionage, facilitating the theft of intellectual property, or evading the export controls or sanctions regimes of any country where it has ever done business.

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Call Completion

- CarrierX, d/b/a Free Conferencing, and HD Tandem filed [a letter](#) on August 7, 2018, to respond to statements in Inteliquent's rural call completion reply comments and to provide information on the issues raised on the broader issue of rural call completion. They noted Inteliquent is currently engaged in litigation with Free Conferencing and HD Tandem in the District Court for the Northern District of Illinois and explained Free Conferencing has obtained leave from the Court to provide to the Commission information in certain internal documents produced by Inteliquent in the litigation. They argued Inteliquent's reply comments are in essence a pleading more properly filed in a federal district court and the Commission should strike those reply comments or, in the alternative, review this ex parte with an eye toward uncovering what they assert is a T-Mobile/Inteliquent scheme to suppress calls to rural areas and obscure Inteliquent's involvement in a traffic scheme in violation of the Communications Act.

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Misc.

- The Wireline Competition Bureau issued a [Public Notice](#) on August 9, 2018, granting a section 214 [application](#) for transfer of control filed by Hospers Telephone Exchange, d/b/a HTC Communications, to Mutual Telephone Company of Sioux Center, Iowa, d/b/a Premier Communications. The Bureau granted the application subject to the condition that if Hospers converts to a non-average schedule cost company, that conversion will trigger application of the condition for the newly converted cost company's operating expense to be capped at the average of the three previous years' operating expense and combined with the inflation-adjusted operating expense data of any other affiliated cost companies. This condition was established in the Hargray/ComSouth [Order](#) and discussed in the Average Schedule Grant [Public Notice](#).
- The Consumer and Government Affairs Bureau issued a [Public Notice](#) on August 10, 2018, seeking to refresh the record in response to the Call Blocking NPRM and NOI on: additional criteria voice providers could use to identify and block illegal calls; industry traceback efforts and what the Commission can do to facilitate these efforts; how to reduce the potential for false positives and how to address situations in which false positives occur; and "white lists," which could allow calling parties to provide numbers to voice service providers to avoid calls being blocked or otherwise adversely impacted. Comments are due September 24, 2018; replies due October 8, 2018.

- Sandwich Isles Communications, et al. filed a [counterclaim](#) in the U.S. District Court on August 3, 2018, against the U.S. Government, the Department of Agriculture, the Rural Utilities Service, and the FCC in the case addressing [claims](#) by the U.S. Government that SIC breached agreements relating to loans RUS provided. SIC claimed it suffered harm and is entitled to damages not less than \$200 million. It requested that SIC be paid universal service funds pursuant to the same formulas and calculations applied to all other RLECs in the United States, and the plaintiff be required to fund the rest of the loans it agreed to fund when it approved SIC's application.
- The FCC issued a [Public Notice](#) on August 6, 2018, announcing the next meeting of the North American Numbering Council will be on September 13, 2018. The NANC will consider a report from its Numbering Administration Oversight Working Group on the technical requirements to consolidate the services of the North American Numbering Plan Administrator and the Pooling Administrator, and will continue discussions on how to modernize and foster more efficient number administration in the United States. Also, the FCC will provide more information on the new Interoperable Video Calling Working Group.
- The Wireline Competition Bureau issued a [Public Notice](#) on August 7, 2018, seeking comments on IP Horizon's application for interconnected VoIP numbering authorization. Comments are due August 22, 2018.
- The FCC issued a [Public Notice](#) on August 9, 2018, to announce FY 2018 Interstate Telecommunications Service Providers and Commercial Mobile Radio Services data is now available for viewing on the FCC's electronic filing and payment system.

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Upcoming Filing Dates

- 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. 17 - Comments due on the state of fixed broadband competition, as required by RAY BAUM'S Act of 2018. [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. 22 - Comments due on IP Horizon's application for interconnected VoIP numbering authorization. [Public Notice](#)
- Aug. 23 - PRA comments due on an extension of a currently approved information collection associated with selecting USAC Board of Directors, and to ensure that requests for review are filed properly with the Commission. [FR](#)

- Aug. 23 - Comments due on the [NPRM](#) on how to determine how a toll-free subscriber should make clear its authorization to text-enable a toll-free number. Reply comments are due September 7, 2018. [FR](#)
- 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](#)
- Aug. 27 - Comments due on the [FNPRM](#) that proposes to extend the freeze of jurisdictional separations category relationships and cost allocation factors for 15 years and to provide RoR carriers who elected to freeze their category relationships a time-limited opportunity to opt out of that freeze. Replies are due September 10, 2018. [FR](#)
- Aug. 29 - Comments due on the proposed eligible services list for the schools and libraries USF support mechanism for funding year 2019. Replies are due September 13, 2018. [Public Notice](#)
- Aug. 30 - Comments due on NTCA's [Petition](#) that seeks a temporary waiver of the updated minimum service speed standard applicable to fixed wireline broadband internet access service eligible for support by the Lifeline program. Replies are due September 14, 2018. [Public Notice](#)
- Aug. 30 - Comments due on TracFone's [Motion](#) to renew its November 2017 [Petition](#) seeking an emergency waiver of section 54.408(b) or declaratory ruling that the rule enables TracFone to comply with the minimum service standards for Lifeline service by providing its Lifeline customers with a specified quantity of units per month that could be used either for voice service, mobile broadband internet access service, or both. Replies are due September 14, 2018. [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. 5 - Replies due on USTelecom's [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. [Public Notice](#), [Order](#)
- Sept. 7 - Replies due on the [NPRM](#) on how to determine how a toll-free subscriber should make clear its authorization to text-enable a toll-free number. [FR](#)
- Sept. 10 - Comments due on the implementation of the e-Connectivity Pilot Program established in the Consolidated Appropriations Act of 2018. [announced](#)
- Sept. 10 - Replies due on the [FNPRM](#) that proposes to extend the freeze of jurisdictional separations category relationships and cost allocation factors for 15 years and to provide RoR carriers who elected to freeze their category relationships a time-limited opportunity to opt out of that freeze. [FR](#)
- Sept. 10 - Comments due on the [Notice of Inquiry](#) on creating a USF pilot program to promote the use of telehealth services among low-income Americans. Replies are due October 10, 2018.
- Sept. 10 - Comments due on the [14th Broadband Deployment Report Notice of Inquiry](#), initiating the next annual assessment of the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion. Replies are due September 24, 2018.

- Sept. 13 - Replies due on the proposed eligible services list for the schools and libraries USF support mechanism for funding year 2019. [Public Notice](#)
- Sept. 13 - Replies due on NTCA's [Petition](#) that seeks a temporary waiver of the updated minimum service speed standard applicable to fixed wireline broadband internet access service eligible for support by the Lifeline program. [Public Notice](#)
- Sept. 14 - Replies due on TracFone's [Motion](#) to renew its November 2017 [Petition](#) seeking an emergency waiver of section 54.408(b) or declaratory ruling that the rule enables TracFone to comply with the minimum service standards for Lifeline service by providing its Lifeline customers with a specified quantity of units per month that could be used either for voice service, mobile broadband internet access service, or both. [Public Notice](#)
- Sept. 17 - Comments due on IP CTS [FNPRM](#). Replies are due October 16, 2018. [FR](#)
- Sept. 24 - PRA comments due on the proposed information collection requirements in the [NPRM](#) on how to determine how a toll-free subscriber should make clear its authorization to text-enable a toll-free number. [FR](#)
- Sept. 24 - Comments due on refreshing the record in response to the Call Blocking NPRM and NOI on additional criteria voice providers could use to identify and block illegal calls. Replies due October 8, 2018. [Public Notice](#)
- Sept. 24 - Replies due on the [14th Broadband Deployment Report Notice of Inquiry](#), initiating the next annual assessment of the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion.
- Oct. 1 - PRA comments due on a revision of a currently approved information collection associated with modifications to the rules applicable to section 214(a) discontinuance applications, which were made in the June 8, 2018 [Second Report and Order](#). [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. 1 - PRA comments due on a revised information collection pursuant to new rules adopted in June 2018 concerning certain information collection requirements implemented under section 251(c)(5) pertaining to network change disclosures and notices of planned copper retirements. [FR](#)
- Oct. 8 - Replies due on refreshing the record in response to the Call Blocking NPRM and NOI on additional criteria voice providers could use to identify and block illegal calls. [Public Notice](#)
- Oct. 10 - Replies due on the [Notice of Inquiry](#) on creating a USF pilot program to promote the use of telehealth services among low-income Americans.
- Oct. 16 - Replies due on IP CTS [FNPRM](#). [FR](#)
- Oct. 16 - Comments due on IP CTS [NOI](#). Replies are due November 15, 2018. [FR](#)
- Oct. 29 - Comments due on whether the rules adopted in 2005-2006 should be continued without change, amended, or rescinded, consistent with the stated objective of section 610 of the Regulatory Flexibility Act. [Public Notice](#) | [Federal Register](#)
- Nov. 15 - Replies due on IP CTS [NOI](#). [FR](#)

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