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August 20, 2018 HIGHLIGHTS

- The FCC issued a [Third Report and Order and Order](#) adopting rules to establish a registry for intermediate providers and require intermediate providers to register with the Commission before offering to transmit covered voice communications. The FCC also denied USTelecom's [petition](#) to stay limited aspects of the [Second Report and Order](#).
- The FCC [seeks](#) PRA comments on a revision of a currently approved information collection associated with rural call completion. PRA comments are due September 14, 2018.
- [NTCA](#) and [USTelecom](#) filed replies on [their separate](#) Petitions for Reconsideration of the Rural Call Completion [Order](#).
- The [Order](#) adopting network testing requirements for recipients of CAF high-cost USF support, including price cap carriers, rate-of-return carriers, RBE support recipients, Alaska Plan carriers, and CAF Phase II auction winners [is effective](#) September 19, 2018.
- The FCC [announced](#) the Office of Management and Budget has approved, for a period of three years, the information collection to determine whether CAF Phase II auction winning bidders are eligible to receive Phase II auction support.
- The FCC [extended](#) the time to file comments in the [Section 706 NOI](#) proceeding. Comments are now due September 17, 2018; replies due October 1, 2018.
- Comments were filed by [USTelecom](#), [NCTA](#), and [INCOMPAS](#) on the state of fixed broadband competition. [Public Notice](#)
- TDS Telecom, Great Plains Communications, et al. [discussed](#) the proceeding on BDS regulation for A-CAM companies, and argued there is no basis for the Commission's proposal to accord model-based RoR carriers different treatment than the Price Cap Order did for price cap carriers with respect to TDM transport.
- The Senate Commerce, Science, and Transportation Committee held a [hearing](#) on oversight of the FCC. [Chairman Pai](#) and the Commissioners [Rosenworcel](#), [O'Rielly](#), and [Carr](#) testified.
- NTCA, et al. [discussed](#) Endeavor's [Petition for Clarification](#) on the separations freeze and the [FNPRM](#) that proposes to extend the separations freeze for 15 years.

Other Key Upcoming Dates

- 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](#)
- Sept. 4 - Comments due on the [8YY Access Charge Reform FNPRM](#). Replies due October 1, 2018.
- Sept. 5 - Replies due on USTelecom's [Petition for Forbearance](#) from certain regulatory obligations imposed on ILECs. [Public Notice](#), [Order](#)

USF Reform

- The FCC [published](#) in the Federal Register on August 20, 2018, the [Order](#) issued on July 6, 2018, adopting network testing requirements for recipients of CAF high-cost USF support, including price cap carriers, rate-of-return carriers, rural broadband experiment support recipients, Alaska Plan carriers, and CAF Phase II auction winners. The Order is effective September 19, 2018.
- The FCC published a [notice](#) in the Federal Register on August 15, 2018, announcing that the Office of Management and Budget has approved, for a period of three years, an information collection associated with the rules for the CAF Phase II auction contained in Orders issued on [June 10, 2014](#), [May 26, 2016](#), and [January 31, 2018](#). The amendment to section 54.315(c)(1)(ii) (Letter of Credit) contained in the January 31, 2018 [Order on Reconsideration](#) is effective August 15, 2018. The Commission will collect information from CAF Phase II auction winning bidders to determine the recipients of Phase II auction support, and to aid in collecting this information, the FCC has created FCC Form 683, which the public will use to provide the disclosures and certifications that must be made by Phase II auction winning bidders in the CAF Phase II auction.
- Verizon filed a [letter](#) on August 14, 2018, regarding an order being [circulated](#) to extend the Mobility Fund challenge window. Verizon said if the Commission extends the Mobility Fund challenge window by 90 days, it should also extend the response window by at least 30 days and delegate to the Wireline Competition and Wireless Telecommunications Bureaus the authority to further extend the response window if necessary. Verizon also said the Commission should direct the Bureaus to correct known errors in USAC's subsidized carrier information to improve the accuracy of the Commission's map of areas presumptively eligible for Mobility Fund support.
- GCI [met with](#) Wireline Competition Bureau staff on August 9, 2018, to review the data it provided in its challenge to the list of locations in partially served census blocks that ACS proposed to serve in fulfillment of its CAF obligations. It also discussed GCI's preliminary analysis of ACS's second list of proposed locations in partially served census blocks, in which GCI claimed it already offers service to some of the locations identified by ACS as unserved.
- No replies were filed 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](#)

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- Northern Valley Communications, Great Lakes Communication, and BTC d/b/a Western Iowa Networks, [met with](#) Commissioner O'Rielly and [Commissioner Carr's Chief of Staff, and Wireline Competition Bureau staff](#) on August 14-15, 2018, to discuss the [NPRM](#) on access stimulation. They discussed CLECs' various concerns with respect to the NPRM, including how quickly the Commission moved forward with the NPRM proceeding, and claimed there was a lack of post-Connect America Fund Order data and evidence that was used to guide the Commission's proposals. They also asserted the Commission's recent INS Tariff Order resolved many issues that had generated recent disputes, thereby making the reforms proposed in the NPRM unnecessary. Northern Valley Communications and Western Iowa Networks also [met with](#) Chairman Pai's Wireline Advisor on August 16, 2018, to discuss the same issues.
- Venture Communications Cooperative and JSI [spoke with](#) Chairman Pai's Legal Advisor on August 13, 2018, to discuss Venture's pending [Petition for Waiver](#) of Part 51 rules for modifying access rate bands and charges and 2011 Base Period Revenue, and to urge for expeditious grant of the waiver.

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Broadband

- The Wireline Competition Bureau released an [Order](#) on August 17, 2018, partially granting Public Knowledge et al.'s [Motion](#) seeking an extension of time to file comments in the proceedings on [the state of fixed broadband competition](#) and the [Section 706 NOI](#). While the Bureau denied the request with respect to the state of fixed broadband competition on which comments were due on August 17, 2018, it, however, extended the deadline to file comments and replies on the [Section 706 NOI](#) until September 17, 2018 and October 1, 2018, respectively.
- Comments were filed on August 17, 2018, on the state of fixed broadband competition, as required by RAY BAUM'S Act of 2018. [USTelecom](#) asserted the FCC should not limit analysis narrowly to "fixed" broadband, because mobile technology is increasingly competing for fixed broadband business and traditional notions of fixed broadband are changing, however while mobile increasingly is a substitute for fixed, the reverse is not true. It also urged the FCC to look for ways to consolidate and streamline provider's reporting obligations. [NCTA](#) said the FCC should move forward with a declaratory ruling in its Wireline Infrastructure proceeding prohibiting local governments from imposing duplicative franchise requirements on broadband and other new services provided over the same network, and should implement competitive bidding procedures in all of its high-cost universal service programs. [INCOMPAS](#) urged the Commission to reform its collection of broadband data via its Form 477 proceeding, claiming the FCC's current Form 477 data is insufficient for purposes of evaluating competition, generally overstating the level of competition. [Public Notice](#)
- The U.S. Court of Appeals for the D.C. Circuit issued an [Order](#) on August 15, 2018, denying the motions filed by the [United Keetoowah Band of Cherokee Indians in Oklahoma, et al.](#) and the [Seminole Tribe of Florida](#) to stay the March 2018 [Second Report and Order](#) that amended and adopted new rules to streamline the wireless infrastructure siting review process. The court said Petitioners have not satisfied the requirements for a stay pending court review. Commissioner Carr issued a [statement](#) on the Order.
- AT&T filed a [letter](#) on August 10, 2018, claiming excessive fees charged by certain municipalities to access rights-of-way and/or municipally-owned ROW structures are barriers to small cell deployments. AT&T said as a result of these high fees, it has focused more of its small cell operational resources in communities where cost-based fees and other predictable benefits of small cell legislation have created a more favorable environment for small cell deployments. AT&T also said the FCC should adopt a 60-day shot clock under section 332 for small cells collocated on existing poles and 90 days for small cells placed on new poles, and should clarify that in municipalities with multi-stage administrative processes, section 332 imposes a single shot clock on siting applications, not a shot clock for each stage.
- Verizon [met with](#) Chairman Pai's Senior Counsel and Legal Advisors to Commissioners O'Rielly, Carr, and Rosenworcel on August 9, 2018, to discuss Verizon's small cell and fiber deployment plans. Verizon asserted some states continue to slow deployment or block it altogether by demanding fees that far exceed costs. Verizon provided an analysis to support the Commission's authority to require states and localities to charge cost-based rates for siting applications, to access state or locally-controlled rights-of-way, and to attach to structures within the rights-of-way.
- Sprint filed a [letter](#) on August 13, 2018, providing an example of the disparities it claims wireless carriers face as they attempt to deploy wireless infrastructure. Sprint asserted that in the City of Los Angeles, the entire application process from start to finish is approximately six months, and the total application fee per site is \$350. Sprint said, in contrast, Los Angeles County's process takes a year or more and imposes application fees of \$9,820. Sprint said without direction from the FCC, carriers will be required to continue these patch-work deployments, diverting resources to those areas that welcome increased broadband speeds from those areas that view increased connectivity as a revenue opportunity.

- CTIA and the Wireless Infrastructure Association [met with](#) Commissioner Carr's Legal Advisor on August 8, 2018, to discuss infrastructure siting regulations for wireless facilities. They reiterated their support for Commission action to ensure that siting rates and fees for wireless infrastructure deployments are cost-based, transparent, and non-discriminatory. They said over the past two years, 20 states have adopted legislation to facilitate wireless infrastructure deployment, including provisions relating to the rates and fees assessed for facility applications and recurring rates such as for attachments to authority-owned poles and other structures.
- NCTA, Comcast, Charter, and Cox [met with](#) Chairman Pai's Chief of Staff on August 9, 2018, to request that the Commission take action to prevent state and local governments from imposing duplicative regulations and fees and other regulatory obstacles that have the effect of hindering the deployment of new facilities and services by cable operators. They also asked the FCC to address ongoing efforts by local franchising authorities to subject non-cable services delivered over cable systems to duplicative regulations and fees, and to reduce barriers to infrastructure investment and deployment.
- American Tower [spoke with](#) Commissioner Carr's Legal Advisor on August 9, 2018, to discuss the streamlining of siting of wireless infrastructure and to suggest steps the Commission could take to further that effort while preserving fundamental state and local prerogatives. American Tower summarized the recommendations as set forth in its August 10, 2018 [ex parte filing](#), including steps to strengthen the Commission's and local governments' long-standing policy of preferring collocation over new construction.
- Crown Castle filed a [letter](#) on August 10, 2018, on the challenges that it faces in deploying infrastructure for next generation wireless networks. It asserted some jurisdictions impose unreasonable fees and conditions on wireless facilities that are particularly inappropriate in the context of small cells. It also said some jurisdictions discriminate against wireless installations in the ROW and apply one set of rules to installations of wireline facilities, while holding infrastructure used for wireless services to a much different and higher standard. Crown Castle encouraged the Commission to use its authority under sections 253, 332, and 6409 of the Spectrum Act to act swiftly to remove remaining state and local barriers to infrastructure deployment.
- Arctic Slope Telephone Association Cooperative [met with](#) Commissioner Carr and his Chief of Staff on August 9, 2018, to provide an update on recent fiber optic projects and ongoing utilization of the Alaska Plan monies. It also discussed construction challenges in the Arctic, coastal erosion, and transportation logistics and costs.

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Call Completion

- The FCC issued a [Third Report and Order and Order](#) on August 15, 2018, adopting rules to establish a registry for intermediate providers and require intermediate providers to register with the Commission before offering to transmit covered voice communications. The FCC said intermediate providers will be required to submit their registration to the FCC within 30 days after a public notice announcing the approval by the Office of Management and Budget of the final rules establishing the registry. The FCC also adopted rules to require covered providers to use only registered intermediate providers to transmit covered voice communications, required covered providers to maintain the capability to disclose the identities of any intermediate providers relied on in the call path to the Commission, and adopted a narrowly tailored exception to its rules in instances of *force majeure*. The FCC also denied USTelecom's [petition](#) to stay limited aspects of the [Second Report and Order](#).
- The FCC published a [notice](#) in the Federal Register on August 15, 2018, seeking Paperwork Reduction Act comments on a revision of a currently approved information collection associated with rural call completion. These information collections will be used by the Commission to determine whether long distance providers are complying with their sections 201 and 202 obligations to provide telephone service to both rural and nonrural customers on a just, reasonable, and nondiscriminatory

basis. The Commission revised this collection to eliminate the existing reporting requirement and to require covered providers to provide rural call completion contact information, which will be used to facilitate industry collaboration to address call completion issues. PRA comments are due September 14, 2018.

- Replies comments were filed on August 13, 2018, on the Petitions for Reconsideration of the Rural Call Completion [Order](#) filed by [NTCA](#) and [USTelecom](#). [NTCA](#) said it is difficult, if not impossible, to see how the task of submitting procedures already required to be documented could possibly be “burdensome,” and argued the “benefit” to be gained in doing so is to provide covered providers with some better incentives both to develop effective procedures and then to hold fast to those procedures in the knowledge that they are on file at the Commission. [NTCA](#) claimed requiring covered providers to file their monitoring procedures with the Commission would also prevent the Commission from having to engage in potentially time-consuming recordkeeping requests in the event of future investigations. [USTelecom](#) filed [reply comments](#) on its [petition for reconsideration](#) and [petition for stay](#) of the Rural Call Completion [Order](#). [USTelecom](#) responded to [NTCA's opposition](#) and claimed nothing in comments by [NTCA](#) rebuts any of the issues raised in the [USTelecom](#) Petitions. [USTelecom](#) asserted the industry and consumers would be better served by reconsideration of the uncodified rules governing the monitoring obligations of non-safe-harbor providers and claimed it would be unrealistic and counterproductive for the Commission to mandate monitoring requirements for non-safe harbor providers by an arbitrary date before it has established the registration, self-monitoring and service quality standards for Intermediate Providers. [USTelecom](#) also notes strong support in the record, aside from [NTCA](#), for the Commission to grant a stay of the order pursuant to its petition and said the Commission has “substantial discretion” to grant a stay where doing so is “equitable and will serve the public interest.” [FR](#)
- Verizon [met with](#) Wireline Competition Bureau staff on August 9, 2018, to discuss the FCC’s implementation of the Improving Rural Call Quality and Reliability Act of 2017. Verizon urged the Commission to limit application of the RCC Act to rural areas, to adopt flexible service quality standards for intermediate providers, and to establish compliance deadlines that implement the RCC Act efficiently and effectively.
- Verizon, Frontier, CenturyLink, Windstream, and [USTelecom](#) [met with](#) Wireline Competition Bureau staff on August 8, 2018, to discuss the August 2018 implementation deadline to establish the registry for intermediate providers under the Improving Rural Call Quality and Reliability Act of 2017. They said the Commission should broadly define the category of intermediate providers subject to the registration requirements and include both common carriers and non-common carriers. They argued any obligations under the RCC Act implemented by the Commission should only apply to rural areas, and not apply on nationwide basis. They also urged the Commission to act on the [USTelecom](#) Petition for Reconsideration and Petition for Stay of the Second Rural Call Completion Order, noting the October 17, 2018 deadline for covered providers to begin monitoring intermediate providers is fast approaching.
- Inteliquent filed a [letter](#) on August 16, 2018, to respond to a [letter](#) filed by Free Conferencing and HD Tandem on call completion. Inteliquent claimed when it attempts to deliver access-stimulated traffic intended for telephone numbers assigned by Reasnor to Free Conferencing, fewer than two percent of calls complete over the regulated path. Inteliquent asserted only if calls are rerouted to bypass the regulated path and traverse HD Tandem’s direct connection into Free Conferencing’s platform do the calls complete. Inteliquent claimed Free Conferencing and HD Tandem continue to engage in traffic pumping and call blocking schemes that harm carriers and their customers throughout the public switched telephone network.
- HD Tandem and CarrierX [spoke with](#) Wireline Competition Bureau staff on August 9, 2018, to discuss cost-shifting techniques of different carriers in handling call traffic to rural areas. They said registration for all intermediate carriers is an important policy mechanism necessary to adequately address rural call completion issues.

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Universal Service

- The Wireline Competition Bureau issued a [Public Notice](#) on August 17, 2018, to announce there is sufficient funding available to fully meet the USAC's estimated demand for category one and category two requests for E-Rate supported services for funding year 2018. The Bureau directed USAC to fully fund eligible category one and category two requests, using \$1.2 billion in E-Rate funds unused from previous years, and any additional funds needed under the current cap to fully meet demand for such services.
- The Wireline Competition Bureau issued a [Public Notice](#) on August 13, 2018, seeking comments on TracFone's emergency [Petition](#) seeking an Order directing USAC to alter the implementation of the National Verifier to optimize the automated and manual eligibility verification process. Comments are due September 12, 2018; replies are due September 27, 2018.
- The Wireline Competition Bureau issued a [Public Notice](#) on August 15, 2018, to announce approval of the joint wireline and wireless [compliance plan](#) of Global Connection for the continued provision of Lifeline service. The Bureau said Global must continue to comply with any future additions to or amendments of the Lifeline program rules unless it has relinquished its relevant designation(s) pursuant to section 214(e)(4) of the Act.
- In addition to comments listed in a previous edition of *REGScan*, comments were filed 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 electronically. [NARUC](#) said the Petition points out serious flaws in the current implementation plans for the National Verifier and urged the Commission to direct USAC to restore carrier APIs prior to the National Verifier's hard launch. [TracFone](#) agreed with Q Link that USAC's withholding of APIs for this aspect of the National Verifier will greatly undermine the policy objectives of the Verifier by erecting additional barriers for eligible consumers to obtain Lifeline services while increasing the administrative burdens on USAC as well as Lifeline service providers. The [National Lifeline Association](#) supported the Petition, claiming the Commission's and USAC's failure to include a service provider API in the National Verifier would have a severely negative impact on all Lifeline service provider business models and eligible low-income Americans. Replies are due August 27, 2018. [Public Notice](#). [All comments available to date](#)
- Haefele TV filed a [Petition](#) on August 17, 2018, seeking ETC designation in New York in all areas in which it has been awarded CAF Phase II support via the New NY Broadband Program. These areas included portions of Cortland, Chemung, Schuylers, Steuben, Tioga and Tompkins Counties in South Central NY.

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State Actions

- The Colorado PUC issued a [Notice of Proposed Rulemaking](#) on August 8, 2018, to amend rules relating to the Colorado High Cost Support Mechanism. The proposed amendments update the HCSM Rules to implement the recently enacted [Senate Bill 18-002](#) concerning the financing of broadband deployment. The NOPR focuses on the reductions in HCSM distributions for basic service and the elimination of regulatory obligations.
- The Kansas Corporation Commission opened a [docket](#) on August 16, 2018, initiating an investigation to determine the assessment rate and the affordable local service rates for rate-of-return regulated carriers for the 23rd year of the Kansas Universal Service Fund, effective March 1, 2019. The KCC recommended Century Link and RLECs file their September 30, 2018 access line data and their October 1, 2018, residential and single-line business rates, by rate group, and resulting local revenue increases, no later than October 19, 2018.

Misc.

- The Senate Commerce, Science, and Transportation Committee held a [hearing](#) on oversight of the FCC on August 16, 2018. Chairman Pai and the Commissioners testified. [Chairman Pai](#) discussed spectrum auctions and FCC efforts to close the digital divide. He said the FCC reformed its Universal Service Fund, noting the FCC recently began its CAF Phase II reverse auction, providing up to \$2 billion to bring fixed broadband to unserved areas, and said that earlier this year, provided about \$500 million in additional funding to assist rate-of-return carriers in expanding broadband deployment in rural America. [Commissioner Rosenworcel](#) said 24 million Americans have no high-speed service and suggested the FCC create a new broadband plan to ensure that every one of them has access to the high-speed service they need by 2020. She also said the FCC should raise the broadband speed standard to 100 Megabits per second. [Commissioner O’Rielly](#) said federal funding should be targeted to addressing the 14 million-plus Americans without any broadband, and noted he has advocated having RUS, NTIA, and the Commission coordinate actual implementation of the differing programs. [Commissioner Carr](#) discussed broadband, wireless infrastructure, spectrum, and telehealth.
- TDS Telecom, Great Plains Communications, Hargray Communications, Consolidated Communications, USTelecom, and ITTA [met with](#) Wireline Competition Bureau staff on August 8, 2018, to discuss the proceeding on BDS regulation for A-CAM companies. They argued there is no basis for the Commission’s proposal to accord model-based RoR carriers different treatment than the Price Cap Order did for price cap carriers with respect to TDM transport. They discussed the showings accompanying ITTA and USTelecom’s comments on the NPRM, which they claimed demonstrate the comparability of market conditions in areas of counties served by model-based RoR carriers with the areas served by price cap carriers in these same counties, asserting this same nationwide analysis applies with equal force to model-based RoR carrier TDM transport services. They said the Commission should eliminate ex ante regulation of such carriers’ provision of TDM transport, just as it did with respect to price cap carriers.
- NTCA, Endeavor Communications and Consortia Consulting [met with](#) Legal Advisors to Chairman Pai and Commissioner O’Rielly, and Wireline Competition Bureau on August 16, 2018, to discuss Endeavor’s [Petition for Clarification](#) on the separations freeze and the recent [FNPRM](#) that proposes to extend the separations freeze for 15 years.
- ACA International filed [comments](#) in response to the [Public Notice](#) requesting input for the FCC Staff Report on Robocalling on August 13, 2018. It said the FTC and FCC must do a better job distinguishing between legitimate and illegal callers, claiming call blocking technologies are impeding legal informational calls. It argued it is pertinent for the FTC and FCC to consider the harm that certain call blocking and labeling technologies are causing for highly legal and regulated debt collection calls and the consumers they serve, and it urged both agencies to take steps to mitigate this harm and to refrain from the rhetoric of sweeping highly legal debt collection calls into the same category of calls as those being made by illegal robocallers and scammers.
- The American Financial Services Association filed [Reply Comments](#) on August 16, 2018, on the FCC staff report on robocalling which sought data and other information on the progress of robocalling initiatives among government, industry, and consumers. AFSA requested the FCC focus its report on robocalling on criminal and fraudulent activity, not outreach from legitimate businesses to their customers. It asserted legitimate businesses are not the primary source of illegal robocalls and should not be included in the Commission’s staff report. Replies are due August 20, 2018. [Public Notice](#)
- CTIA [met with](#) Legal Advisors to Chairman Pai and Commissioners O’Rielly and Rosenworcel on August 9, 2018, to discuss robocall issues. CTIA asserted the record demonstrates near unanimity among calling parties, service providers and consumers that the Commission should expeditiously resolve the TCPA issues remanded by the D.C. Circuit. CTIA also claimed that establishment of a mandatory database of reassigned numbers would present significant financial, operational and technical challenges, and asserted a new database of reassigned telephone numbers would have no impact on mitigating illegal, unwanted robocalls from bad actors. CTIA encouraged the Commission to adopt a safe harbor for good faith callers that reasonably rely upon qualifying market-based TCPA

solutions, rather than waiting years to implement a new database. CTIA also [met with](#) Commissioner Carr's Chief of Staff on August 14, 2018, to discuss the same issues.

- Reply comments were filed on August 16, 2018, on the state of mobile wireless competition. [NATOA and the National League of Cities](#) asserted wireless service and infrastructure providers are deploying at an unprecedented rate and making capital expenditure decisions based on market size, not local regulations. They asserted local governments are not a barrier to entry into the wireless mobile marketplace, nor are they standing in the way of expanded deployment of services. [CCA](#) asserted AT&T and Verizon's combined market share is stifling mobile wireless competition and as a result, the market cannot be considered effectively competitive. CCA also claimed the state of competition and deployment faces particular challenges in rural and remote areas. [Public Notice](#)
- Reps. Frank Pallone (D N.J.), Mike Doyle (D Penn.), Jerry McNerney (D Calif.) and Debbie Dingell (D Mich.) sent a [letter](#) to Chairman Pai on August 14, 2018, to ask the Commission for information regarding an [OIG report](#) that found the FCC's Electronic Comment Filing System was unprepared to handle the volume of comments in the open internet proceeding in May 2017. They asked for information as to when the Commission became aware the ECFS failure was not due to a distributed denial-of-service attack, and why the Commission did not correct statements it made regarding the cause of the attack, among other things. They asked that the Commission respond by August 28, 2018.
- The FCC [published](#) in the Federal Register on August 20, 2018, the [Report and Order](#) issued on July 13, 2018, which forbears from interexchange dialing parity requirements and amends the N-1 rule to facilitate the move toward complete nationwide number portability. The Report and Order is effective September 19, 2018.
- The Wireline Competition Bureau released an [Order](#) on August 15, 2018, granting a request from [Inland Cellular](#) to temporarily port all its subscribers' numbers while it fixes a catastrophic network outage. The Bureau directed iconectiv, the LNP Administrator, to work with Inland to allow porting across the LATA boundary during this emergency, effective immediately and for 90 days, expiring on November 13, 2018. The Bureau said if Inland is unable to resume service on a normal basis after this period, it may request additional relief from the Bureau.

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Upcoming Filing Dates

- 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. 12 - Comments due on TracFone's emergency [Petition](#) seeking an Order directing USAC to alter the implementation of the National Verifier to optimize the automated and manual eligibility verification process. Replies are due September 27, 2018. [Public Notice](#)
- 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 - PRA comments due on a revision of a currently approved information collection that eliminated the existing reporting requirement and to require covered providers to provide rural call completion contact information, which will be used to facilitate industry collaboration to address call completion issues. [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. 17 - 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 Oct. 1, 2018. [Order](#)
- 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. 27 - Replies due on TracFone's emergency [Petition](#) seeking an Order directing USAC to alter the implementation of the National Verifier to optimize the automated and manual eligibility verification process. [Public Notice](#)
- 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. 1 - 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. [Order](#)
- 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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