

NECA's Weekly Federal Regulatory Summary

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September 8, 2020 HIGHLIGHTS

- The Wireline Competition Bureau [announced](#) TRPs for use by RoR carriers that have elected incentive regulation for their BDS offerings have been posted on the [FCC's website](#).
- The Rural Broadband Auctions Task Force, Office of Economics and Analytics, and WCB [announced](#) the status of the 505 short-form applications received for the RDOF Phase I auction.
- The OEA [denied](#) five requests for waiver of the deadline for filing short-form applications to participate in the RDOF auction.
- Oppositions [are due](#) September 16, 2020, to Bloomingdale Telephone's [application for review](#) of the [order](#) denying its [petition](#) for a waiver of the March 1, 2019 deadline to upload and certify geocoded location information data with USAC through the HUBB portal. Replies are due September 28, 2020.
- The WCB, RBTF, and OEA [authorized](#) \$5,206,701 in CAF Phase II support for Viasat's winning bid to serve 13,819 locations in Mississippi. [news release](#)
- The USDA [announced](#) it is investing more than \$9 million to provide broadband service in unserved and underserved rural areas in Virginia.
- Comments [are due](#) October 5, 2020, on NECA's 2021 modification of the average schedule company universal service HCLS [formula](#). Replies are due October 20, 2020.
- USAC filed the [Federal Universal Service Support Mechanisms Quarterly Contribution Base](#) for the fourth quarter 2020.
- The FCC [announced](#) the signing of a [memorandum of understanding](#) with the Department of Health and Human Services and Department of Agriculture to work together on a rural telehealth initiative.
- NTCA [discussed](#) 8YY access charge reform, including the importance of explicit alternative cost recovery mechanisms for RLECs.
- [Comments were filed](#) on the [FNPRM](#) on additional steps to further protect consumers from robocalls. Replies are due September 29, 2020.
- The FCC issued a [report and order](#) that adopted a schedule to collect \$339 million in regulatory fees for fiscal year 2020. The FCC [announced](#) regulatory fees are due September 25, 2020.
- The WCB and OEA [released](#) results from the supply chain information collection.
- [Comments were filed](#) on the [FNPRM](#) on how the FCC should integrate sections 2, 3, 5 and 7 of the Secure Networks Act into its supply chain proceeding. Replies are due September 14, 2020. [FR](#)

Other Key Upcoming Dates

- Sept. 18 - Comments due on the [16th Broadband Deployment Report NOI](#). Replies due October 5, 2020.

USF Reform

- The Rural Broadband Auctions Task Force, Office of Economics and Analytics, and Wireline Competition Bureau issued a [public notice](#) on September 1, 2020, announcing the status of the 505 short-form applications received for the Rural Digital Opportunity Fund Phase I auction (Auction 904). They said bidding in the auction will begin on October 29, 2020. They also included information on modification and resubmission of short-form applications and reminded applicants of certain procedures the Commission adopted for this auction. Additionally, they noted 121 short-form applications have been designated as complete and listed in attachment A of the public notice, and 384 are classified as incomplete and listed in attachment B.
- The Office of Economics and Analytics issued an [order](#) on September 1, 2020, addressing requests for waiver of the deadline for filing short-form applications to participate in the RDOF auction filed by Native Network, SmartSky Networks, Affinity Technology Solutions, Elektrafi and Little Miami Gig. The OEA denied the requests, stating petitioners have not met the requirement of showing that waiving the deadline will serve the public interest.
- Western Iowa Wireless [spoke with](#) Chairman Pai's wireline advisor, and Office of Economics and Analytics, Wireline Competition Bureau, and Wireless Telecommunications Bureau staff on August 31, 2020, regarding its [petition for reconsideration](#) of the [public notice](#) that updated the list of census blocks that have been deemed initially eligible for the RDOF Phase I auction. WIAW said grant of its petition will not delay the auction or upset any bidder's settled expectations.
- Chairman Pai sent [letters](#) to 23 members of Congress on August 26, 2020, to respond to their letter claiming the [February 2020 RDOF order](#) may inadvertently undermine the ability of states to help close the digital divide. Pai said if a service provider already has been given funding (federal and/or state) and is obligated to serve a specific area with at least 25/3 Mbps broadband, the FCC is not going to give more taxpayer funding to deploy a network in that area, and asserted doing so would be an irresponsible use of limited taxpayer dollars.
- Chairman Pai sent [letters](#) to Reps. Deb Haaland (D-N.M.) and Tom Cole (R-Okla.) on August 24, 2020, to respond to their letter asking the FCC to extend the start of the upcoming RDOF auction and to extend the FCC's tribal priority filing window. Pai said postponing of the start of the RDOF auction delays the deployment of high-speed broadband to unserved areas, and the 30-day extension for the tribal priority filing window strikes an appropriate balance between providing more time for additional tribal entities to apply and not unduly delaying the grant of licenses to those that already have applied. Pai sent similar [letters](#) to 35 members of Congress on August 24, 2020, in response to their request for the FCC to extend the rural tribal priority window and additional [letters](#) on the same issue to Reps. Frank Pallone (D-N.J.) and Mike Doyle (D-Pa.) on August 28, 2020.
- The Wireline Competition Bureau issued a [public notice](#) on September 3, 2020, seeking comments on Bloomingdale Telephone's [application for review](#) of the [order](#) denying its [petition](#) for a waiver of the March 1, 2019 deadline to upload and certify geocoded location information data with USAC through the HUBB portal. Oppositions are due September 16, 2020; replies to oppositions are due September 28, 2020.
- State Telephone filed an [application for review](#) on September 3, 2020, of the [order](#) denying its [petition](#) for a waiver of the March 1, 2019 deadline to upload and certify geocoded location information data with USAC through the HUBB portal.
- The Wireline Competition Bureau, Rural Broadband Auctions Task Force, and Office of Economics and Analytics issued a [public notice](#) on September 2, 2020, announcing they authorized \$5,206,701 in CAF Phase II support for Viasat's winning bid to serve 13,819 locations in Mississippi. [news release](#)
- Wilkes Telephone Membership Corporation filed a [letter](#) on September 2, 2020, pursuant to the July 29, 2020 [public notice](#), indicating it elects to receive an additional year of CAF Phase II model-based support for the state of Virginia in the amount of \$857,021.

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- NTCA [spoke with](#) Chairman Pai's economic advisor and Wireline Competition Bureau staff on August 28, 2020, regarding 8YY access charge reform. NTCA urged adoption of a default rule to preclude parties from unilaterally dictating changes to existing financial responsibilities for interconnection and transport. NTCA said at the very least the FCC should make explicit in any upcoming order with respect to 8YY traffic that, in the absence of mutual agreement, no party may force a change to any RLEC's existing interconnection points that define financial responsibility for interconnection and transport of calls pursuant to any tariff, contract or other arrangement even if the ICC rates applicable under such vehicles may be altered by a Commission order. Additionally, NTCA discussed the reductions in access revenues that would arise out of any such transition and the importance of explicit alternative cost recovery mechanisms for RLECs.
- USTelecom, Consolidated, Frontier and Verizon [spoke with](#) Commissioner Rosenworcel's legal advisor on August 27, 2020, regarding 8YY access charge reform. USTelecom, et al. asserted its [negotiated compromise resolution](#) moves forward with 8YY reform in a manner consistent with the principles of the 2011 USF/ICC transformation order, reduces arbitrage and is legally sustainable. They suggested the FCC move quickly to adopt the reform based upon that proposal.
- The Ad Hoc Telecom Users Committee filed a [letter](#) on September 2, 2020, urging the Commission to move forward with adopting reform in the 8YY access charge regime. Ad Hoc claimed the current 8YY access pricing regime is an economically inefficient system that incentivizes bad actors to perpetrate arbitrage and access stimulation schemes. Ad Hoc said correction of the 8YY pricing regime is necessary with or without a revenue replacement mechanism for ILECs and said it would no longer oppose inclusion of a revenue replacement mechanism.
- Aureon Network Services filed a [letter](#) on September 3, 2020, to address USTelecom's 8YY access charge reform [proposal](#). Aureon asserted the Commission should not adopt USTelecom's proposal because it would: require the FCC to regulate intrastate access service rates, which is beyond the Commission's statutory authority; preclude Aureon, contrary to Rule 61.38, from recovering the costs of operating its centralized equal access network; prohibit Aureon from charging a just and reasonable rate and earning the Part 65 prescribed rate of return; and create new implicit subsidies, contrary to section 254 of the Act. Aureon asserted the Commission should adopt a rule stating 8YY access arbitrage to be an unjust and unreasonable practice.
- Lingo Communications of Kentucky [spoke with](#) Wireline Competition Bureau and Office of Economics and Analytics staff on September 2, 2020, regarding its interstate access service Tariff F.C.C. No. 1. Lingo said they discussed the revisions to its tariff that were scheduled to take effect on July 31, 2020, and the reasons those revisions were [suspended](#) by the Commission on July 30, 2020.

Broadband

- The USDA [announced](#) on August 31, 2020, it is investing more than \$9 million to provide broadband service in unserved and underserved rural areas in Virginia. Scott County Telephone Cooperative will use the funding to deploy an FTTP network. The funding is through the USDA's ReConnect program.
- Comments due September 8, 2020, on the [third FNPRM](#) on broadband mapping. Replies due September 17, 2020; PRA comments due October 19, 2020. [FR](#)
- An FCC [notice](#) was published in the Federal Register on September 7, 2020, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection relating to consumer broadband services testing and measurement. PRA comments are due November 9, 2020.

- Chairman Pai [spoke](#) at the ITU Global Symposium for Regulators on September 1, 2020, regarding communications networks during the pandemic. Pai said the biggest reason U.S. carriers were equipped to handle the surge in traffic was the investments they made several years prior to the pandemic. Pai asserted unleashing private markets often can be the most effective way to advance the public interest and since 2017, the FCC has taken actions to reduce regulatory barriers and create incentives to invest in next-generation networks. Pai also discussed the Keep Americans Connected Pledge and the new \$200 million COVID-19 Telehealth program.
- The FCC issued a [news release](#) on September 3, 2020, announcing the FCC's first-ever spectrum priority filing window for rural tribes closed on September 2, 2020. The FCC said the rural tribal priority window presented an opportunity for eligible tribal entities to obtain overlay licenses for prime mid-band spectrum covering rural tribal lands to help address their connectivity needs and close the digital divide in Indian country. The window opened on February 3, 2020, and the FCC received more than 400 applications from tribal entities.
- Chairman Pai sent [letters](#) to 33 members of Congress on August 24, 2020, in response to their request for the FCC to extend the Rural Tribal Priority Window. Pai said in light of the pandemic, the application window was extended an additional 30-days, until September 2, 2020. Pai said this 30-day extension strikes an appropriate balance between providing more time for additional Tribal entities to apply and not unduly delaying the grant of licenses to those that already have applied. Pai sent similar [letters](#) to Reps. Frank Pallone (D- N.J.) and Mike Doyle (D-Pa.) on August 28, 2020, in response to their requests for an extension of the application window.
- AT&T [spoke with](#) Wireline Competition Bureau and Wireless Telecommunications Bureau staff on September 3, 2020, regarding AT&T's Calibrated RF Propagation Model processes. AT&T discussed how calibration reports could be used to satisfy the Broadband DATA Act's requirement that the Commission verify the provider's broadband coverage data submissions. AT&T asserted this option could be used in lieu of the proposal in the third FNPRM to require burdensome and expensive network-wide drive testing.
- The FCC issued a [notice of apparent liability of forfeiture](#) on September 2, 2020, proposing a \$163,912 fine against Barrier Communications d/b/a BarrierFree, for apparently failing to file FCC Form 477 twenty-seven times. The FCC also said BarrierFree filed inaccurate data Form 477 data on four other occasions, making it appear that broadband service was readily available in communities where it did not offer service. [news release](#)
- Comments were filed on September 2, 2020, on NCTA's [petition](#) requesting the FCC clarify that, in unserved areas, it is unjust and unreasonable for pole owners to shift the entire cost of a pole replacement to a new attachers. [AT&T](#) said a declaratory ruling is not the vehicle to change rules allowing pole owners to recover all pole replacement costs from the cost causer. AT&T also said the requested declaration about FCC authority is unwarranted due to its uncertain impact. [CenturyLink](#) said the FCC should deny the petition, claiming it seeks to relitigate issues about available space on poles that were raised in rulemakings in 1996 and settled in federal court litigation in 2002. CenturyLink asserted no uncertainty or controversy exists. [USTelecom](#) asserted what the petition terms a request for clarification is in fact a request to revise the Commission's existing rules in a manner that would shift costs from attachers to pole owners, including incumbent service providers. USTelecom said the petition should be addressed in a rulemaking process. [Xcel Energy](#) urged the Commission to dismiss or deny NCTA's request, claiming it would effectively overturn the Commission's established rules and policies concerning pole replacements performed by electric utilities. [ExteNet Systems](#) requested the FCC grant NCTA's petition but extending the requested relief to all areas (unserved or otherwise), and to both wireline and wireless providers. ExteNet also asked for a declaration that FCC-regulated pole attachment rates apply to replacement poles in Commission-regulated states. [ACA Connects](#) agreed with NCTA that the FCC must take action to resolve pole replacement fee issues. ACA also supported adoption of NCTA's request for resolution of pole attachments complaints in unserved areas, but requested the FCC extend this treatment to pole attachment complaints generally. [all comments available](#). Replies are due September 17, 2020. [public notice](#) | [order](#)

Robocalls

- Comments were filed on August 31, 2020, on the [FNPRM](#) on additional steps to further protect consumers from robocalls. [WTA](#) asserted the best way to resolve robocall blocking issues is the development and implementation of an efficient, effective and economic alternative caller ID authentication framework for calls originating on the 40% or more of the voice service network where STIR/SHAKEN does not work. [NTCA](#) asserted the Commission should take steps to ensure call blocking and labeling technologies and practices sufficiently protect consumers from false positives that result in legitimate and wanted calls from being blocked. [AT&T](#) urged the Commission to adopt the proposed safe harbor without delay. It also supported the proposal to require voice service providers to cooperate in the industry traceback process and adoption of USTelecom's [robocall mitigation proposal](#). [USTelecom](#) said the Commission should require all voice service providers to respond to traceback requests and impose affirmative robocall mitigation obligations on voice service providers when they originate robocalls. [INCOMPAS](#) urged the Commission not to permit additional call blocking based on caller ID authentication information and not extend a safe harbor over other types of call blocking using this information. [Noble Systems](#) said the Commission should develop regulations requiring a per-call blocking notification for callers and clarify its regulations with respect to providing safe harbor to voice service providers when they inadvertently block calls. [Encore Capital Group](#) said to prevent erroneous call blocking of legitimate calls, VSPs should be required to provide callers with advance notice of blocking. [ZipDX](#) proposed, as part of a safe harbor for providers, foreign-sourced calls be prohibited from using USA caller ID values, and for telemarketing calls it suggested restrictions on web-based consent. Replies are due September 29, 2020. [FR](#) | [all comments available](#)
- The Consumer and Governmental Affairs Bureau issued an [erratum](#) on September 1, 2020, correcting the docket number in the [public notice](#) that announced comment and reply dates for the call blocking [FNPRM](#).
- USTelecom, AT&T, Frontier, CenturyLink, and Verizon and the SIP Forum [spoke with](#) Wireline Competition and Public Safety and Homeland Security Bureau staff on August 28, 2020, to express support for the [order](#) requiring all originating and terminating voice service providers to implement STIR/SHAKEN in the IP portions of their networks by June 2021. They also suggested all voice service providers should implement a robust appropriate robocall mitigation program.
- ACA Connects [spoke with](#) Wireline Competition and Public Safety and Homeland Security Bureau staff on August 28, 2020, regarding the call blocking [FNPRM](#). ACA reiterated its support for the proposed one-year deadline extension for small voice providers to implement STIR/SHAKEN, and urged the Commission to complete its required review of the deadline extension.

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Other Universal Service

- The Wireline Competition Bureau issued a [public notice](#) on September 3, 2020, seeking comment on NECA's 2021 modification of the average schedule company universal service high cost loop support [formula](#). Comments are due October 5, 2020; replies are due October 20, 2020.
- USAC filed the [Federal Universal Service Support Mechanisms Quarterly Contribution Base](#) for fourth quarter 2020 on September 1, 2020.
- The FCC [announced](#) on September 1, 2020, the signing of a [memorandum of understanding](#) with the Department of Health and Human Services and Department of Agriculture to work together on a rural telehealth initiative joint effort to collaborate and share information to address health disparities, resolve service provider challenges, and promote broadband services and technology to rural areas in America. As part of the MOU, the agencies intend to establish an interagency rural telehealth initiative task force comprised of representatives from each agency, which will meet regularly to consider future recommendations or guidelines for this effort and exchange agency expertise, scientific and technical information, data and publications.

- The Wireline Competition Bureau issued an [order](#) on September 3, 2020, extending waivers of the rural health care and E-Rate program gift rules through December 31, 2020. It also waived the RHC deadline for responding to information requests from USAC through December 31, 2020. Additionally, the Bureau directed USAC to provide a 30-day extension to E-Rate program participants impacted by the pandemic that request an extension to respond to certain USAC information requests issued through December 31, 2020.
- The Wireline Competition Bureau issued a [public notice](#) on September 3, 2020, to provide additional information on the [connected care pilot program](#) and guidance to assist applicants in preparing to apply for the program. The rules for the pilot program were adopted in April 2020. [news release](#)
- Commissioner Carr [announced](#) on September 3, 2020, he will visit Ohio for events focused on the FCC's role in responding to the COVID-19 pandemic and visit a number of sites with Rep. Bob Latta (R-Ohio), including a facility using CARES Act funding to provide behavioral health treatment, and an ISP connecting to its customers pursuant to special authority granted by the Commission during the pandemic.
- The Wireline Competition Bureau released a [public notice](#) on August 31, 2020, granting, denying and dismissing various petitions related to actions taken by USAC on E-rate, rural health care and USF contributions. Petitions for reconsideration or applications for review of these decisions must be filed within 30 days of the public notice.
- Chairman Pai sent [letters](#) to 14 members of Congress on August 18, 2020, in response to their letter urging him to support expanded flexibility in the Lifeline program to help low-income consumers stay connected to voice and internet service during the pandemic. Pai said the [June 2020 waiver](#) for consumers in rural areas on tribal lands was implemented based on the unique difficulties in submitting documentation for residents in those remote areas. Pai said the FCC has not seen the same conditions and challenges for consumers in other areas that would necessitate the same waiver, and have not extended this waiver into non-tribal and urban areas. Pai said FCC staff will continue to monitor the situation and determine whether additional waivers are needed.
- The Wireline Competition Bureau issued a [public notice](#) on August 31, 2020, seeking comment on the National Lifeline Association's [petition](#) requesting the Commission waive the Lifeline mobile broadband minimum service standard increase and voice support phasedown scheduled to take effect on December 1, 2020. Comments are due September 14, 2020; replies are due September 21, 2020.
- The Wireline Competition Bureau issued an [order](#) on September 2, 2020, denying a [request](#) filed by Critical Hub Networks and Aeronet Wireless Broadband for a 30-day extension of the deadline to file stage 2 applications for the PR-USVI Fund, or in the alternative, a 30-day extension for the submission of letters of credit. The Bureau said they did not establish good cause for deviation from the application deadlines or to permit major modifications to the bid areas.
- Chairman Pai sent a [letter](#) to Rep. Stacey Plaskett (D-Virgin Islands) on August 27, 2020, in response to her letter expressing support for a [request for waiver](#) filed by a coalition of broadband providers, of the letter of credit requirements for the PR, USVI Fund. Pai said the Commission [recently reduced](#) the monetary value required for letters of credit for the Stage 2 competitive process winners to bring the requirements in line with the lower letter of credit requirements bidders in the Rural Digital Opportunity Fund must comply with.
- Critical Hub Networks and Aeronet Wireless Broadband filed a [request](#) on August 31, 2020, for a 30-day extension of the deadline to file stage 2 applications for the PR-USVI Fund, or in the alternative, a 30-day extension for the submission of letters of credit.
- Puerto Rico Telephone Company [spoke with](#) Wireline Competition Bureau staff on September 1, 2020, to urge the Bureau to act on the [request](#) filed by Critical Hub Networks and Aeronet Wireless Broadband for a 30-day extension of the deadline to file stage 2 applications for the PR-USVI Fund.

- Broadband VI filed a [letter](#) on August 28, 2020, in response to Viya's [letter](#) that alleged BVI's non-compliance with the rules governing the Commission's Connect USVI Fund. BVI asserted there is no basis for it to return its stage 1 support and no basis for an investigation by the Enforcement Bureau.
- The State of Colorado filed a [petition](#) on September 2, 2020, seeking an emergency waiver of current restrictions on the use of E-Rate funds and E-Rate-funded facilities, to allow schools to extend their broadband network connectivity to students' homes, or other safe and convenient community access points, where physical classrooms are not fully open and students cannot access virtual classrooms.
- Replies were filed on September 4, 2020, on the proposed E-rate eligible services list for funding year 2021. [Aruba, an HP Company](#), [Cox](#), and [Funds for Learning](#) expressed support for making advanced network security features and firewall features eligible for E-Rate funding. The [Illinois Office of Broadband](#) urged the Commission to immediately open a proceeding to examine the eligibility of network services generally under the E-rate program. [public notice](#)

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Misc.

- The Wireline Competition Bureau issued a [public notice](#) on September 4, 2020, announcing tariff review plans for use by rate-of-return carriers that have elected incentive regulation for their business data services offerings pursuant to the 2018 [RoR BDS order](#) have been posted on the [FCC's website](#). The [2020 TRP order](#) required RoR carriers that have elected incentive regulation pursuant to the RoR BDS order to file TRPs reflecting any exogenous cost adjustment for TRS, NANPA, and regulatory fees in rates to be effective October 1, 2020. The Bureau also required the exogenous cost adjustment for TRS to be grossed up to spread the entire adjustment over the remaining months in the tariff year. It said, however, the October 1, 2020 exogenous cost filing and rate adjustment is optional for electing carriers if the total amount of such exogenous cost adjustments would either increase rates or have a revenue impact of no more than \$960 per year. Links to [holding company BDS midcourse TRP](#) and [individual study area BDS midcourse TRP](#).
- NTCA and USTelecom [spoke with](#) Chairman Pai and his economic advisor to express their positions on, and concerns regarding the implications of, [proposed reforms](#) on detariffing telephone access charges, consistent with their respective comments in this proceeding.
- The FCC issued a [report and order and FNPRM](#) on August 31, 2020, adopting a schedule of regulatory fees to assess and collect \$339 million in regulatory fees for fiscal year 2020. The schedule of regulatory fees for FY 2020 is attached in appendix C of the order. The FNPRM seeks comment on four proposals from commenters to differentiate regulatory fees for different types of non-geostationary orbit satellites in future years. Comments are due 30 days after Federal Register publication; replies are due 45 days after FR publication.
- The FCC released a [public notice](#) on September 4, 2020, announcing the opening of the Commission's automated filing and payment system for FY 2020 regulatory fees, which are due September 25, 2020. The FCC said while FY 2020 regulatory fees will not become effective until the August 31, 2020 order is published in the Federal Register, regulatees, at their own discretion, may submit payments at any time before the effective due date. The FCC also issued a [public notice](#) on procedures for filing requests for waiver, reduction, deferral and installment payment of regulatory fees, and a [public notice](#) announcing payment methods and procedures for regulatory fees.
- The Wireline Competition Bureau and Office of Economics and Analysis issued a [public notice](#) on September 4, 2020, announcing release of public results from the supply chain information collection, conducted in response to the supply chain [order](#). Information was collected to determine whether ETCs, or their affiliates and subsidiaries, own equipment or services from Huawei and ZTE as well as information about the nature of the equipment and services, the costs associated with purchasing and/or installing such equipment and services, and the costs associated with removing and replacing such equipment and services. The bureaus said based on the information collection, it could cost an estimated \$1.837 billion to remove and replace Huawei and ZTE equipment. [news release](#)

- Comments were filed on August 31, 2020, on the [FNPRM](#) on how the FCC should integrate sections 2, 3, 5 and 7 of the Secure Networks Act into its supply chain proceeding. [NTCA](#) supported the creation of a list of prohibited equipment and services to offer clarity to communications providers as they build out and maintain their networks. NTCA also suggested the FCC include in the covered list not only equipment and services identified as posing a threat to national security, but any equipment and services separately identified as a threat by other federal agencies. [USTelecom](#) asserted under the Secure Networks Act, there are certain mandates the FCC must follow in determining threats to national security under which it has no discretion. It said where the FCC does have discretion it should act carefully to create a balanced process that provides equity, certainty and clarity for all parties involved. [CTIA](#) supported the FCC's proposal to prohibit the use of federal funds for communications equipment and services published on the covered list and urged the FCC to focus the prohibition on the use of universal service funds. The [Rural Wireless Association](#) said the process for placing equipment or services on the covered list should be transparent, and the Commission should clarify the prohibition on using federal funds to purchase or maintain Huawei or ZTE equipment and services applies to all USF programs. Replies are due September 14, 2020. [FR](#) | [all comments available](#)
- China Telecom filed an [application for review](#) on August 31, 2020, of the International Bureau's [letter](#) on its intention to disclose to the Department of Justice confidential information submitted by CTA filed in response to the [order to show cause](#) on why the FCC should not revoke CTA's domestic and international section 214 authorizations. CTA asserted the IB lacks authority to grant the DOJ's request for disclosure of the confidential information.
- The Rural Wireless Association [spoke with](#) Wireline Competition Bureau staff on September 1, 2020, regarding the Secure Networks Act's reimbursement program and whether the Commission can provide any assurances to carriers that they will be reimbursed for replacement equipment they purchase before the final rules are adopted. RWA also asked about the possibility of carriers using their existing legacy universal service support to purchase replacement equipment.
- USTelecom [spoke with](#) Office of General Counsel and Wireline Competition Bureau staff on August 28 and 31, 2020, regarding INCOMPAS's [ex parte notice](#) that suggested even if the FCC found CLECs are not impaired without access to dark fiber, it should require ILECs to indefinitely continue to offer unbundled access to any dark fiber arrangements ordered before January 6, 2020. USTelecom asserted this outcome would be contrary to the Communications Act, Commission and judicial precedent, and Congressional intent.
- The Wireline Competition Bureau issued a [public notice](#) on September 3, 2020, seeking comment on a section 214 application filed by Sodtown Telephone Company and Sodtown Communications, Inc., requesting consent to transfer the telecommunications assets and customer base of STC to SCI. Comments are due September 17, 2020; reply comments are due September 24, 2020.
- The Wireline Competition Bureau issued a [public notice](#) on September 4, 2020, granting a section 214 application filed by ETS Telephone and ETS Cablevision that requested consent to transfer control of ETS to Radiate Holdings.
- The [NPRM](#) updating the FCC's ex parte rules was published in the [Federal Register](#) on September 2, 2020. The FCC seeks comment on several aspects of its rules, including proposals to: exempt from the rules, in certain proceedings, government-to-government consultations between the Commission and federally recognized tribal nations; and require all written ex parte presentations and written summaries of oral ex parte presentations be submitted before the Sunshine period begins. Comments are due October 2, 2020; replies are due November 2, 2020.
- The Wireline Competition Bureau issued an [order](#) on August 31, 2020, granting, on its own motion, a waiver of the FCC's telephone number aging rule (section 52.15(f)(ii)) to all companies that provide service in areas of Louisiana, Texas, Mississippi, Puerto Rico and Arkansas affected by Hurricane Laura. The aging rule states service providers may only age telephone numbers that have been disconnected for up to 90 days before assigning them to other customers. This waiver is in effect for a nine month period, expiring on May 28, 2021, and will also apply to residential customers in other

areas for which President Trump declares states of emergency, either due to Hurricane Laura or to later storms during the 2020-2021 hurricane season.

- The Wireline Competition Bureau issued [two public notices](#) on September 4, 2020, announcing it granted applications by Noble Systems Communications and Star2Star Communications for authorization to obtain NANP telephone numbers directly from the numbering administrators for their iVoIP service.
- The Wireline Competition Bureau issued a [public notice](#) on September 1, 2020, announcing UComTel filed an application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. Comments are due September 16, 2020.
- The FCC issued a [public notice](#) on August 31, 2020, announcing the next meeting of the Technological Advisory Council will be held on September 22, 2020, via conference call and available to the public [online](#). At this meeting, the TAC will hear presentations from its four working groups: 5G/IOT/V-RAN; Future of Unlicensed Operations; Artificial Intelligence; and 5G Radio Access Network Technology.

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Upcoming Filing Dates

- Sept. 9 - PRA comments due on a new information collection on Alaska Plan end of term commitments. [FR](#)
- Sept. 14 - Replies due on the [FNPRM](#) that integrates provisions of the Secure Networks Act into the FCC's existing supply chain proceeding. [FR](#)
- Sept. 14 - Comments due on the National Lifeline Association's [petition](#) requesting the FCC waive the Lifeline mobile broadband minimum service standard increase and voice support phasedown scheduled to take effect on December 1, 2020. Replies due September 21. [public notice](#)
- Sept. 16 - Comments due on UComTel's application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. [public notice](#)
- Sept. 16 - Oppositions due to Bloomingdale Telephone's [application for review](#) of the [order](#) denying its [petition](#) for a waiver of the March 1, 2019 deadline to upload and certify geocoded location information data with USAC through the HUBB portal. Replies to oppositions are due September 28, 2020. [public notice](#)
- Sept. 17 - 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. 17 - Replies due on the [third FNPRM](#) on broadband mapping. PRA comments due October 19, 2020. [FR](#)
- Sept. 17 - Comments due on a section 214 application filed by Sodtown Telephone Company and Sodtown Communications, Inc., requesting consent to transfer the telecommunications assets and customer base of STC to SCI. Reply comments are due September 24, 2020. [public notice](#)
- Sept. 18 - Comments due on the [16th 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 due October 5, 2020.
- Sept. 21 - PRA comments due on a revision of a currently approved collection associated with Part 32 accounting requirements.

- Sept. 21 - Replies due on the National Lifeline Association's [petition](#) requesting the FCC waive the Lifeline mobile broadband minimum service standard increase and voice support phasedown scheduled to take effect on December 1, 2020. [public notice](#)
- Sept. 24 - Replies due on a section 214 application filed by Sodtoun Telephone Company and Sodtoun Communications, Inc., requesting consent to transfer the telecommunications assets and customer base of STC to SCI. [public notice](#)
- Sept. 28 - PRA comments due on a revision of a currently approved information collection associated with the Telehealth for Low Income Consumers and COVID-19 Telehealth Programs. [notice](#)
- Sept. 28 - Replies to oppositions due on Bloomingdale Telephone's [application for review](#) of the [order](#) denying its [petition](#) for a waiver of the March 1, 2019 deadline to upload and certify geocoded location information data with USAC through the HUBB portal. [public notice](#)
- Sept. 29 - Replies due on additional steps to further protect consumers from robocalls and inform them about provider blocking efforts. [FNPRM](#) | [FR](#)
- Oct. 2 - Comments due on the [NPRM](#) on updating the FCC's ex parte rules. Replies due November 2. [FR](#)
- Oct. 5 - Replies due on the [16th 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. 5 - Comments due on NECA's 2021 modification of the average schedule company universal service high cost loop support [formula](#). Replies are due October 20, 2020. [public notice](#)
- Oct 19 - PRA comments due on the [third FNPRM](#) on broadband mapping. [FR](#)
- Oct. 20 - Replies due on NECA's 2021 modification of the average schedule company universal service high cost loop support [formula](#). Replies are due October 20, 2020. [public notice](#)
- Oct. 23 - PRA comments due on an extension of a currently-approved information collection associated with inside wiring. [notice](#)
- Nov. 2 - Replies due on the [NPRM](#) on updating the FCC's ex parte rules. [FR](#)
- Nov. 9 - PRA comments due on an extension of a currently approved information collection relating to consumer broadband services testing and measurement. [FR](#)

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