The FCC adopted seven items at the September 26, 2018 Open Meeting, including: a Declaratory Ruling and Report and Order to clarify the scope and meaning of sections 253 and 332(c)(7), establish shot clocks for state and local approvals for the deployment of small wireless facilities, and provide guidance on streamlining state and local requirements on wireless infrastructure deployment; an NPRM addressing calls to 911; and two enforcement actions on spoofed telemarketing calls (NAL) and caller ID spoofing. The FCC also heard a presentation on the results of the CAF Phase II auction.

Comments are due October 29, 2018, on proposed approaches to resolving discrepancies between the number of model-determined funded locations that Phase II auction support recipients are expected to serve and the actual number of locations that support recipients can serve. Reply comments are due November 13, 2018.

The FCC resolved challenges to 4,762 locations proposed by ACS to receive CAF support, finding 1,713 of the locations will be eligible for high-cost support.

Sen. Joe Manchin (D-W. Va.) and seven other Senators asked USDA Secretary Sonny Perdue to designate a high-cost set aside within the $600 million e-Connectivity Pilot Program.

NortheastTel and WTA discussed the high-cost budget for RoR carriers and the Network Testing Order.

Comments were filed to refresh the record on the Call Blocking NPRM and NOI on additional criteria voice providers could use to identify and block illegal calls. Replies due October 8, 2018.

The FCC suspended Aureon's Tariff Transmittal No. 38, finding that substantial questions of lawfulness exist regarding how Aureon revised its proposed switched transport rate.

Reply comments were filed by AT&T and Sprint on AT&T's Petition for Reconsideration of the Order that concluded the investigation into Aureon Network Services' tariff. Aureon filed an opposition to motions filed by Sprint and AT&T seeking to amend the Protective Order in the proceeding so as to allow inside consultants access to confidential information.

Other Key Upcoming Dates
- Oct. 1 - Replies due on the 8YY Access Charge Reform FNPRM.
- Oct. 1 - Replies due on the 14th Broadband Deployment Report NOI.
- Oct. 8 - Replies due to refresh the record on the Call Blocking NPRM and NOI on additional criteria voice providers could use to identify and block illegal calls. Public Notice.

Editor: Teresa Evert | Assistant Editor: Shawn O'Brien
USF Reform

- The FCC published in the Federal Register on September 28, 2018, the Public Notice seeking comment on proposed approaches to identifying and resolving apparent discrepancies between the number of model-determined funded locations that Phase II auction support recipients are expected to serve and the actual number of locations that support recipients can serve. Comments are due October 29, 2018; reply comments are due November 13, 2018.

- The Wireline Competition Bureau issued an Order on September 28, 2018, resolving challenges to 4,762 locations proposed by ACS to receive CAF support. The Bureau found that 1,713 of the locations will be eligible for high-cost support and granted ACS’s request for a short extension of the deadline for submitting its deployment plan for meeting its CAF Phase II deployment obligations.

- The Rural Broadband Auctions Task Force gave a presentation on the CAF Phase II Auction at the FCC’s September 26, 2018 Open Meeting. It reported of the 220 qualified bidders and 173 placed bids, there were 103 winning bidders, with $1.49 billion awarded over ten years. It said the reserve price of areas won was $5 billion over 10 years, but inter-area competition brought the price down to $1.98 billion and intra-area competition brought it down to $1.49 billion.

- The Association of Federal Communications Consulting Engineers filed a Petition for Reconsideration on September 27, 2018, of the instructions for FCC Form 683, Application for Connect America Fund Phase II Auction Support. It claimed these instructions improperly re-interpreted and materially changed a decision reached by the Commission in a February 1, 2018 Public Notice and redefined the term “Professional Engineer” as that term has been used for over fifty years, namely a person licensed by a state or territory to practice engineering and/or provide professional engineering services to the public.

- Sen. Joe Manchin (D-W.Va.) and seven other Senators sent a letter to USDA Secretary Sonny Perdue on September 27, 2018, asking him to designate a high-cost set aside within the $600 million e-Connectivity Pilot Program established in the Consolidated Appropriations Act to provide broadband to rural and geographically challenged areas of the country that need it most. They noted according to the FCC, of the 24 million American households that do not have reliable, affordable, high-speed internet, 80 percent are located in rural areas. Press Release

- NortheastTel and WTA met with Commissioner Rosenworcel’s Legal Advisor on September 19, 2018, to discuss the high-cost budget for RoR carriers and the Network Testing Order. NortheastTel emphasized the need for an early decision on pending budget revision issues and for the sufficient, stable, and predictable support flows required to extend, upgrade, and operate its broadband network. It expressed particular concern that the budget control mechanisms have become operational again as of July 1, 2018, noting it has already lost about $20 thousand of high-cost support that it otherwise would have received under the applicable Commission rules and calculations. They asserted the testing framework adopted in the Network Testing Order was not designed with RLECs in mind, and imposes unnecessary burdens, practical implementation difficulties, and excessive costs that will impair RLECs’ ability to deploy and upgrade their broadband services. WTA noted it filed an Application for Review of the Order, but is willing to work with the Commission to develop a practicable and reasonable performance testing framework for RLECs.

Back to Highlights

ICC

- The Pricing Policy Division issued an Order on September 28, 2018, suspending Aureon’s Transmittal No. 38, Tariff F.C.C. No. 1, Access Services, which was filed on September 24, 2018, in compliance with the FCC’s July 31, 2018 Rate Order. The PPD said because substantial questions of lawfulness exist regarding how Aureon revised the switched transport rate contained in its proposed tariff...
revisions, it suspended the revisions for one day and set for investigation the question of whether Aureon complied with the Aureon Rate Order in revising its switched transport rate.

- Petitions were filed on September 27, 2018, by AT&T and Sprint, asking the Commission to reject or to suspend and investigate the revised tariff filed by Aureon Network Services filed on September 24, 2018, under Transmittal No. 38. AT&T claimed Aureon’s tariff filing continues to raise questions about Aureon’s CEA ratemaking practices and contains rates that deserve further exploration. It suggested the Commission either reject outright or, at a minimum, suspend Aureon’s revised tariff and set for investigation the issue of whether Aureon’s revised rate complies with the Commission’s regulations, its Rate Order, and is just and reasonable. Sprint said Aureon’s new tariff contains extensive changes and an enormous volume of purportedly supporting data, and asked the Commission to suspend Aureon’s new tariff filing and to grant the pending motions for amendment of the Protective Order so Sprint’s in house experts can conduct a careful analysis of the new data that Aureon advances.

- Reply comments were filed on September 26, 2018, on AT&T’s Petition for Reconsideration of the Order that concluded the investigation into Aureon Network Services’ tariff. AT&T asserted the FCC’s benchmark rate calculation violates the CLEC benchmark rules because it used a hybrid rate based on CenturyLink’s rate elements and Aureon’s weighted average mileage, rather than CenturyLink’s. Sprint suggested the FCC grant AT&T’s Petition and issue an order under the pending NPRM on ICC that completes the transition to bill-and-keep by eliminating the remaining access charge rate elements - originating, tandem switching, and transport. Public Notice

- Aureon filed an Opposition to motions filed by Sprint and AT&T that seek to amend the Protective Order in the Aureon tariff investigation proceeding to allow inside consultants’ access to the confidential information. Aureon said the FCC should continue to protect the confidentiality of Aureon’s sensitive information against disclosure to employees of Aureon’s business rivals, particularly given the especially sensitive nature of the circuit-by-circuit inventory that Aureon soon will be providing.

- Aureon Network Services filed a letter on September 24, 2018, to provide notice that it filed Transmittal No. 38, Tariff F.C.C. No. 1, Access Services, in compliance with the FCC’s July 31, 2018 Rate Order. Aureon said because the tariff submission is a compliance filing required by the Order, pursuant to the terms of the Protective Order, Aureon has designated certain information in its filing as confidential. Aureon said a public version of its tariff filing, including accompanying cost and traffic studies, is being filed via ETFS, with summary circuit inventory data removed from that filing.

- The Enforcement Bureau issued an Order on September 26, 2018, granting the joint Motion filed by CenturyLink and Birch Communications, a CLEC, to dismiss CenturyLink’s complaint against Birch for filing a tariff for interstate access service rates that exceeded the applicable CLEC benchmark rates. The parties indicated they have resolved their dispute.

Broadband

- Chairman Pai spoke at the White House 5G Summit on September 28, 2018, to discuss the FCC’s strategy for 5G. Pai said 5G could effectively remove speed, responsiveness, and capacity as meaningful constraints on wireless innovation, and wireless networks will be 100 times faster and the lag time between a device’s request for data and the network’s response will be less than one-tenth of what it is today. Pai said the FCC’s strategy is the 5G FAST plan—a plan to Facilitate America’s Superiority in 5G Technology, which includes three key components: pushing more spectrum into the marketplace; updating infrastructure policy; and modernizing outdated regulations.

- Twenty-five Members of Congress sent a letter to Chairman Pai on September 25, 2018, offering suggestions on promoting local deployment of advanced communications services, protecting local authority, and 5G. They urged the FCC: to recognize localities' historic and ongoing role in managing rights-of-way to ensure safe deployment and achieve aesthetic goals; establish "guardrails" to delineate where local regulations either promote or effectively prohibit the construction of the networks
needed for 5G and broadband; ensure that localities are fully compensated for their costs in issuing permits, overseeing deployment, and, where necessary, managing the rights-of-way; and set reasonable and enforceable deadlines for localities to act on wireless permit applications.

- The Senate Commerce, Science, and Transportation Commission announced it will hold a hearing on October 4, 2018, entitled Broadband: Opportunities and Challenges in Rural America, which will assess the progress of broadband deployment in rural America and continue to explore ways in which closing the digital divide will benefit American jobs and the economy. Witnesses include Godfrey Enjady of Mescalero Apache Telecom, Inc., Denny Law of Golden West Telecommunications, Mona Thompson of Cheyenne River Sioux Tribe Telephone Authority, and Grant Spellmeyer of U.S. Cellular.

- The GAO issued a report to Congress on September 28, 2018, entitled, Tribal Broadband: Few Partnerships Exist and the Rural Utilities Service Needs to Identify and Address Any Funding Barriers Tribes Face. The GAO reported the FCC and RUS are the primary sources of federal funding to deploy broadband infrastructure where the cost of providing service is high, including on tribal lands. It reviewed funding for four programs, three in the FCC and one grant program in RUS, and found that in total, less than 1 percent has gone directly to tribes or to tribally owned broadband providers to expand broadband service.

- Greenlining Institute, Public Knowledge, The Utility Reform Network, and NASUCA filed their Opening Brief on September 26, 2018, in the Ninth Circuit case addressing their Petition for Review of the November 2017 Order and Declaratory Ruling on changes to the pole attachment rules, network change disclosure processes, and section 214(a) service discontinuance processes. Petitioners asserted the court should vacate the 2017 Order and restore the 2015 Order with regard to the Functional Test, notice requirements, and de facto retirements.

- Verizon filed a letter on September 24, 2018, in support of USTelecom’s Petition for Forbearance from certain regulatory obligations imposed on ILECs. Verizon claimed the record demonstrates the outdated ILEC-specific regulations from which USTelecom seeks forbearance are no longer necessary to protect consumers, competition, or the public interest in today’s marketplace. Verizon claimed forbearance from UNE dark-fiber transport would not harm consumers and said, in all but a few instances, it and other providers, including other CLECs, successfully serve customers without relying on UNE dark fiber.

- INCOMPAS met with Wireline Competition Bureau staff on September 20, 2018, to discuss its opposition to USTelecom’s Petition for Forbearance from certain regulatory obligations imposed on ILECs. INCOMPAS disagreed with USTelecom’s argument that the Commission should not consider the impact of UNEs on promoting competition for the provision of broadband internet access service. INCOMPAS claimed UNEs enable CLECs to provide voice and broadband services to consumers that lack any alternatives for wireline broadband internet access, to jump start fiber deployment in underserved markets, and to offer innovative services that push incumbent carriers and cable companies to improve their broadband offerings.

- Charter Communications met with Chairman Pai’s Wireline Advisor and Wireline Competition Bureau staff on September 25 and 27, 2018, to discuss Form 477 data. Charter suggested the Commission consider: amending the data collection to include census-block level serviceability information; switching from a semi-annual to an annual filing of the Form 477; and discontinuing the collection of contractual or guaranteed throughput rates for business/enterprise/government services. Charter also asserted that any new obligations that would require providers to report their deployment via subcensus block geolocation information would be extremely burdensome, and possibly cost providers hundreds of millions of dollars to implement.

- Sprint met with Chairman Pai’s Special Counsel and Legal Advisors to Commissioners Carr, O’Rielly, and Rosenworcel on September 19, 2018, to discuss the draft Order on streamlining wireless infrastructure deployment. Sprint urged the Commission to address the following barriers to wireless infrastructure deployment: access to rights-of-way and structures owned by state and local governments; fees charged by state and local governments to locate small cells on property owned by those entities; and the timelines for state and local governments to review applications.
Universal Service

- The Wireline Competition Bureau issued a Public Notice on September 28, 2018, granting, dismissing, or denying requests for review and waivers and petitions for reconsideration of decisions related to E-rate actions taken by USAC. The deadline for filing petitions for reconsideration or applications for review concerning the disposition of any of these requests is 30 days from release of this Public Notice.

- TracFone filed reply comments on September 27, 2018, on its emergency Petition seeking an Order directing USAC to alter the implementation of the Lifeline National Verifier to optimize the automated and manual eligibility verification process. TracFone claimed the record is clear that the Commission must intervene in the deployment of the Verifier and grant the relief requested by TracFone. TracFone also asserted the sole opposition to the Petition misunderstands it and relevant FCC orders. Public Notice.

- NECA filed its USF 2018 Submission of 2017 Study Results on September 28, 2018, in compliance with section 54.1307 of the FCC’s rules.

- ATN International met with Chairman Pai’s Advisors on September 19, 2018, to discuss Stage 2 of the Connect USVI Fund. ATN urged the Commission to move expeditiously to adopt rules and a funding allocation process for Stage 2, suggesting the Commission allocate Stage 2 funding in a manner that will ensure the most rapid availability of sustainable fixed voice and broadband services throughout the entire USVI.

- Central Virginia Services filed a Petition on September 24, 2018, seeking ETC designation for a service area in Virginia containing 1,524 census blocks for the purpose of receiving CAF Phase II support. CVSI said it was awarded the support via CAF Phase II Auction 903, and requested expedited action to conform to the requirement that winning bidders obtain ETC designation.

- Wind River Internet filed a Petition on September 26, 2018, seeking ETC designation for its service area within the federally recognized Wind River Reservation, including the Census Block Groups for which it has winning bids in the CAF Phase II Auction 903. Wind River said no state public utility commission has jurisdiction over the service area where it is seeking ETC designation and the Commission has jurisdiction over its Petition.

- Hankins Information Technology (supplement), BARConnects, PGEC Enterprises, Gibson Connect, and EMPOWER Broadband filed petitions seeking ETC designation for the purpose of receiving CAF Phase II support, as required by winning bidders of the CAF Phase II Auction 903.

Misc.

- The FCC released the following items that were adopted at the September 26, 2018 Open Meeting: a Declaratory Ruling and Report and Order to clarify the scope and meaning of sections 253 and 332(c)(7), establish shot clocks for state and local approvals for the deployment of small wireless facilities, and provide guidance on streamlining state and local requirements on wireless infrastructure deployment; an NPRM addressing calls to 911; a Report and Order that eliminates the Form 325 Annual Report of Cable Television Systems filing requirement; a Report and Order allowing the use of auctions to assign certain toll-free numbers and modernizing the administration and assignment of toll-free numbers; a Report and Order and FNPRM to facilitate the deployment and harmonize of the rules concerning three types of fixed-satellite service earth stations authorized to transmit while in motion;
and two enforcement actions on spoofed telemarketing calls (NAL) and caller ID spoofing. The FCC also heard a presentation on the results of the CAF Phase II auction.

- The FCC deleted from the September 26, 2018 Open Meeting agenda the Second FNPRM addressing issues raised by a remand from the Sixth Circuit concerning how local franchising authorities may regulate incumbent cable operators and cable television services. The FCC said the item had already been adopted.

- Comments were filed September 24, 2018, to refresh the record on the Call Blocking NPRM and NOI on additional criteria voice providers could use to identify and block illegal calls. USTelecom supported expanding the authority of voice providers to voluntarily block, label, or otherwise mitigate illegal robocalls, but said the Commission should avoid codifying any particular measures. It supported adopting a safe harbor, consistent with the one proposed by AT&T, to provide certainty to voice providers that choose to institute blocking measures consistent with the rules adopted in this proceeding. USTelecom noted it has led the Industry Traceback Group, whose members are committed to identifying the source of illegal robocalls and working with law enforcement to bring these illegal perpetrators to justice. It suggested the Commission clarify section 222(d)(2) to encourage reticent providers to more willingly participate in the sharing of CPNI information during investigations into the source of unlawful robocall campaigns. ITTA said any further actions the Commission takes in this proceeding should be done on a permissive, but not mandatory, basis. It suggested the Commission establish an industry-wide white list, with robust safeguards to ensure that a request to be added to the white list is, indeed, legitimate, and the Commission also should establish timelines to promote rapid verification of white list requesters and updating of white lists. It supported a safe harbor wherein a provider would be immune from any Commission enforcement liability for legitimate calls blocked or illegal calls that are not blocked as long as the provider is acting in good faith within the contours of the rules the Commission adopts. AT&T described the steps it is taking to block illegal robocalls, and reported its fraud experts observe that illegal robocalls transiting its wholesale network typically originate from actively assigned telephone numbers. While AT&T currently is blocking such calls that transit its wholesale IP platform, it claimed it does not presently have clear authority to block illegal robocalls elsewhere in its network outside the context of the 2017 Call Blocking Order. It recommended the Commission authorize provider-initiated blocking of actively assigned telephone numbers with appropriate safeguards and adopt a safe harbor that would insulate service providers that take a measured and reasonable approach to provider-initiated call blocking programs. The Encore Capital Group claimed false positives, wherein service providers are blocking lawful calls thought to be illegal robocalls, has become an enormous unintended consequence of the Commission's rule to target and eliminate unlawful robocalls. It said the result has been significant harm both to businesses making large volumes of legitimate calls and to the consumers they serve. Encore urged the Commission to clarify the definition of robocall and to create safeguards, including a white list of legitimate numbers, to stop the surge of improper blocking of legitimate calls. Numeracle filed comments on September 24, 2018, to refresh the record on the Call Blocking NPRM and NOI on additional criteria voice providers could use to identify and block illegal calls. Numeracle claimed current industry practices are threatening the viability of voice communications by inaccurately labeling and blocking legal and wanted calls. It recommended the FCC support a streamlined process for call originators to identify who they are, the numbers they use, and the intent of the calls. Numeracle recommended a process for identification and classification of trusted entities requiring transparency and accountability in a secured and encrypted structure managed by the entity to minimize confidential and competitive information from being shared across carriers, analytics engines, and app providers; and the FCC should avoid requesting more call patterns and tactics to identify illegal versus legal callers as illegal callers will simply implement the same tactics to mimic legal call patterns. Replies due October 8, 2018. All comments available to date. Public Notice

- ACA International spoke with Chairman Pai's Legal Advisor on September 19, 2018, to discuss the TCPA interpretations and call blocking and labeling technologies. ACA claimed litigation following the ACA International D.C. Circuit decision has created a patchwork of requirements, and it urged the FCC to act on its Public Notice concerning the D.C. Circuit decision and provide clarity. It claimed call blocking and labeling Apps are impeding legitimate business communications and are raising consumer protection concerns. It claimed phone carriers are also contributing to the call blocking and labeling issues, saying it has been reported that in certain instances they are delivering fake busy
signals to block legal calls. ACA International also spoke separately with Commissioner Rosenworcel’s Legal Advisor and staff from the Consumer and Government Affairs Bureau on September 19, 2018, to discuss the same issues.

- First Orion filed a report on September 25, 2018, entitled Scam Call Trends and Projections Report; Fall 2018. The report claimed 44.6% of calls to mobile phones will be scam calls in 2019, and mobile-originated scams are up over 400% from 2017. It said the key take-aways are: mobile carriers are the first line of defense and must adopt in-network solutions to protect consumers; consumer awareness is required to ensure they understand what solutions are available and how to avoid getting scammed; solution providers must outpace increasingly innovative scam techniques and mobile applications alone are not the answer; and government agencies must work closely with the industry to support appropriate solutions.

- Replies were due September 28, 2018, on an application filed by United Communications request for Commission approval to transfer control of UCH, and its subsidiaries to MTE Holdings. Public Notice

- Bright Packet filed an application on September 25, 2018, for authority to acquire telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator as an interconnected VoIP service provider.

- The FCC published in the Federal Register on September 28, 2018, the Order making non-substantive revisions to authority citations in Title 47 of the Code of Federal Regulations. The FCC said the changes effected by this Order are intended only to bring the authority citations into conformance with Administrative Committee of the Federal Register regulations and the document drafting handbook of the Office of the Federal Register. The Order is effective September 28, 2018.

- Congresswoman Anna Eshoo (D-Calif.) issued a News Release on September 28, 2018, announcing she introduced a bill entitled The Truth-In-Billing, Remedies, and User Empowerment over Fees (‘TRUE Fees’) Act on September 28, 2018, which would require phone, cable, and internet providers to include all charges in the prices they advertise for service and would provide remedies for consumers when they have been wrongfully charged. (Bill not yet available)

Upcoming Filing Dates

- Oct. 1 - Replies due on Haefele TV’s Petition 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. 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. 4 - Oppositions due to Public Knowledge’s Petition for Reconsideration of the section 214(a) service discontinuance rules promulgated in the June 8, 2018 Report and Order. Replies to oppositions are due October 15, 2018. FR

• Oct. 5 - Comments due on NECA’s 2019 Modification of the Average Schedule Universal Service High Cost Loop Support Formula. Replies are due October 22, 2018. Public Notice

• Oct. 5 - Paperwork Reduction Act comments due on an extension of a currently approved information collection associated with FCC Form 498, Service Provider and Billed Entity Identification Number and Contact Information. Notice

• 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. 8 - Nominations due for six Board member positions on the USAC Board of Directors, for a three-year term. 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. 12 - Comments due for the FCC’s report on promoting broadband internet access service for veterans. Replies are due October 29, 2018. Public Notice

• Oct. 15 - Replies to oppositions due to Public Knowledge’s Petition for Reconsideration of the section 214(a) service discontinuance rules promulgated in the June 8, 2018 Report and Order. FR

• Oct. 22 - Replies due on NECA’s 2019 Modification of the Average Schedule Universal Service High Cost Loop Support Formula. Public Notice

• 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

• Oct. 29 - Replies due for the FCC’s report on promoting broadband internet access service for veterans. Public Notice

• Oct. 29 - Comments due on the Public Notice seeking comment on proposed approaches to identifying and resolving apparent discrepancies between the number of model-determined funded locations that Phase II auction support recipients are expected to serve and the actual number of locations that support recipients can serve. Reply comments are due November 13, 2018. FR

• Nov. 13 - Reply comments due on the Public Notice seeking comment on proposed approaches to identifying and resolving apparent discrepancies between the number of model-determined funded locations that Phase II auction support recipients are expected to serve and the actual number of locations that support recipients can serve. FR

• Nov. 19 - PRA comments due on a new information collection to establish an intermediate provider registry. Notice

Back to Highlights

Editor: Teresa Evert | Assistant Editor: Shawn O’Brien