

NECA's Weekly Federal Regulatory Summary

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October 7, 2019 HIGHLIGHTS

- The FCC issued a [tentative agenda](#) for its October 25, 2019 Open Meeting. The FCC will consider six items, including an [order on reconsideration](#) on CAF testing procedures and performance measures that provides flexibility for smaller carriers. The order also addresses several petitions for reconsideration and applications for review of the [2018 Performance Measures Order](#). Chairman Pai [posted](#) a blog on the Open Meeting items, including the CAF testing item.
- The U.S. Court of Appeals for the District of Columbia issued an [opinion](#), granting in part and denying in part petitions for review of the 2018 Restoring Internet Freedom [order](#).
- The FCC [announced](#) it is ready to authorize CAF Phase II Auction 903 support for the 566 winning bids identified in Attachment A of the public notice. Applicants are required to submit irrevocable standby letter(s) of credit and Bankruptcy Code opinion letter(s) by October 15, 2019.
- NTIA [announced](#) the release of a new National Broadband Availability Map pilot.
- Great Lakes Communication, Northern Valley Communications, et al. filed a [petition for stay](#) of the [report and order](#) that adopted reforms to eliminate access arbitrage schemes.
- Comments [are due](#) October 23, 2019, on TrioTel's [petition](#) for a waiver to implement the merger of affiliated rate-of-return study areas in South Dakota by modifying its 2011 interstate switched access revenue requirement and 2011 rate-of-return carrier Base Period Revenue. Replies are due November 4, 2019.

Other Key Upcoming Dates

- Oct. 21 - Replies due on the [NPRM](#) proposing to establish a new Rural Digital Opportunity Fund. [FR](#)

USF Reform

- The Rural Broadband Auctions Task Force, Wireline Competition Bureau, and Office of Economics and Analytics issued a [public notice](#) on September 30, 2019, announcing they are ready to authorize CAF Phase II Auction 903 support for the 566 winning bids identified in Attachment A of the public notice. They said to be authorized to receive the total 10-year support amounts listed in Attachment A, the long-form applicants identified are required to submit acceptable irrevocable standby letter(s) of credit and Bankruptcy Code opinion letter(s) from their legal counsel for each state where they have winning bids that are ready to be authorized by the applicable deadline, which is 6:00 p.m., October 15, 2019.
- West River Telecommunications Cooperative and Consortia Consulting [spoke with](#) Chairman Pai's special counsel on September 27, 2019, regarding the A-CAM II election process.
- West River Telecommunications Cooperative filed a [petition for waiver](#) on October 4, 2019, of the July 17, 2019 due date for providing notification directly to the FCC regarding A-CAM II elections. WRT asserted it submitted its notice of A-CAM II election to NECA on July 10, 2019, for study area code 381637, but due to an administrative error, failed to submit the election letter to the Wireline Competition Bureau as well. WRT said it submitted an A-CAM election letter to the Bureau on July 29, 2019.
- Miller Telephone filed a [letter](#) on October 3, 2019, to supplement its pending [petition for waiver](#) to notify the FCC of its intent to elect A-CAM II support. Miller asserted the supplement shows Total Highspeed's June 2018 FCC Form 477 data supports Miller's claim that the fixed wireless provider does not offer broadband service in Miller's service area and never did. Miller said the FCC should grant its petition, and offer it an opportunity to elect A-CAM II with a revised calculation.
- MuralNet [met with](#) staff of the Rural Broadband Auctions Task Force, Office of Native Affairs and Policy, Consumer and Governmental Affairs Bureau, Office of Economics and Analytics on September 25, 2019, to discuss the potential tribal bidding credit component of the Rural Digital Opportunity Fund. MuralNet said tribes and tribally-owned entities should be the first to be allowed to claim any available tribal bidding credits under the RDOF. It also said where a non-tribal entity wishes to apply for a tribal bidding credit, the FCC should require the entity to prove an established partnership with the tribe and related tribal entities over the land that they seek to serve before being able to receive that credit.
- Northeast Rural Services filed a [petition for waiver](#) on October 1, 2019, of the rural broadband experiment rules that allow USAC to draw on NRS's letters of credit to recover support funds in the event of a default and, instead, permit NRS to voluntarily relinquish the support funds disbursed to NRS for two projects. NRS said it will not be able to meet the build-out milestones for project IDs 3 and 9 and that completing the build-outs of those projects will not be economically feasible. NRS said allowing it to voluntarily relinquish the disbursed support funds will still allow the Commission to quickly reclaim the funds and will not diminish the protection afforded by the letters of credit.
- [Electra Telephone](#) and [Tatum Telephone](#) filed petitions on October 2, 2019, requesting an additional 90 days be added to their original [waiver requests](#) of section 54.313(f)(2)(ii), which requires privately held rate-of-return carriers that are not recipients of loans from the Rural Utilities Service and whose financial statements are audited in the ordinary course of business to file a copy of their audited financial statements with their Form 481. They indicated they entered into separate stock purchase agreements with Townes Tele-Communications, and have yet to receive the necessary documentation from the prior owners to satisfy various financial, audit, and tax reporting obligations.

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Broadband

- NTIA [announced](#) the release of a new National Broadband Availability Map pilot on October 2, 2019. NTIA said it worked with a group of eight states to create the pilot, a geographic information system

platform that allows for the visualization of federal, state, and commercially available data sets. NTIA said the map will be made available exclusively to state and federal partners, as it includes non-public data that may be business sensitive or have licensing restrictions. NTIA said it will test the map's functionality and expand it to other states, and add data from additional partners, federal agencies, industry and accessible commercial datasets. NTIA also said the map includes data that the FCC collects twice a year, as well as other federal and non-federal datasets that can inform broadband planning and policy-making.

- An FCC [notice](#) was published in the Federal Register on October 4, 2019, announcing its intent to establish the Task Force for Reviewing the Connectivity and Technology Needs of Precision Agriculture in the United States. The FCC intends to establish the charter on or before December 19, 2019, providing the task force with authorization to operate for two years. The purpose of the task force is to identify and measure current gaps in the availability of broadband internet access service on agricultural land and develop policy recommendations to promote the rapid, expanded deployment of broadband internet access service on unserved agricultural land, among other things.
- Replies are due October 7, 2019, on the [FNPRM](#) on enhancing the new Digital Opportunity Data Collection, incorporating mobile voice and broadband, and improving satellite broadband reporting.
- New America's Open Technology Institute [met with](#) Commissioner Starks' special advisor on September 27, 2019, to discuss the Digital Opportunity Data Collection FNPRM. It urged the FCC to collect data on the cost of broadband service in the United States, and said affordability remains a major barrier to broadband adoption. It reiterated the need for the Commission to continue publishing broadband data in a manner that is transparent, open, and machine-readable. It also expressed concern about the DODC proceeding's impact on the E-Rate and RHC programs, noting that the DODC FNPRM included a question about duplicative funding. It also urged the Commission to reject T-Mobile's proposed acquisition of Sprint.
- Reply comments were filed on September 30, 2019, on the [NPRM](#) on issues that may affect the deployment of broadband to multiple tenant environments, including exclusive marketing and wiring arrangements, revenue sharing agreements, and state and local regulations. [Verizon](#) said the FCC should consider targeted regulation to prohibit providers from entering into revenue sharing agreements as a condition of building access and from entering into exclusive wiring agreements for MTE-owned wiring, while continuing to allow exclusive marketing arrangements without burdensome and counterproductive disclosure obligations. [NCTA](#) said to promote continued growth and competition in the MTE marketplace, the Commission should decline to adopt additional regulations. It said to the extent the Commission does regulate this marketplace, it should apply its regulations to all parts of MTEs and to all broadband providers on a competitively and technologically neutral basis. [INCOMPAS](#) asserted the FCC should prohibit exclusive arrangements that encourage scarcity, higher prices, and slower broadband, and to promote and enable competitive building access on a non-discriminatory basis. [all replies available public notice](#)
- The Rural and Agriculture Council of America filed a [letter](#) on October 4, 2019, attaching a transcript of Jess Peterson's interview with Commissioner Carr on the USTelecom pilot program results and the importance of updating the FCC's broadband mapping rules. They discussed the Rural Digital Opportunity Fund and USTelecom's broadband mapping initiative and report on the pilot program findings. They also discussed GPS technology for locating unserved structures and 5G network evolution in rural areas.
- The Wireless Telecommunications and Wireline Competition Bureaus issued an [order](#) on September 30, 2019, extending the time to file comments and replies on the Wireless Infrastructure Association's petitions for [rulemaking](#) and [declaratory ruling](#) regarding section 6409(a) of the Spectrum Act of 2012, and on CTIA's [petition for declaratory ruling](#) regarding section 6409 and the rules implementing section 224 of the Communications Act. Comments are due October 29, 2019; reply comments are due November 13, 2019.
- The Wireless Infrastructure Association, et al. [met with](#) Chairman Pai and his special counsel, and Commissioners Starks, Carr, O'Rielly, and Rosenworcel and their legal advisors on September 30,

2019, and October 1 and 2, 2019, to discuss WIA's petitions for [rulemaking](#) and [declaratory ruling](#) regarding section 6409(a) of the Spectrum Act of 2012.

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Open Internet

- The U.S. Court of Appeals for the District of Columbia issued an [opinion](#) on October 1, 2019, granting in part and denying in part petitions for review of the 2018 Restoring Internet Freedom [order](#). The court upheld the order with two exceptions. The court said the FCC has not shown legal authority to issue its preemption directive (2018 order ¶¶ 194–204), which would have barred states from imposing any rule or requirement the Commission repealed or decided to refrain from imposing in the order or that is more stringent than the order, and vacated that portion. The court also remanded the order to the FCC on three points, stating the order: failed to examine the implications of its decisions for public safety; does not sufficiently explain what reclassification will mean for regulation of pole attachments; and did not adequately address petitioners' concerns about the effects of broadband reclassification on the Lifeline program.
- Chairman [Pai](#) and Commissioners [Rosenworcel](#) and [O'Rielly](#), [Starks](#), [Carr](#) issued statements on October 1, 2019, on the [opinion](#) from the D.C. Circuit Court of Appeals that upheld most of the Restoring Internet Freedom [order](#). Pai, O'Reilly, and Carr expressed support for the opinion.

ICC

- Great Lakes Communication, Northern Valley Communications, et al. filed a [petition for stay](#) on October 4, 2019, of the [report and order](#) that adopted reforms to eliminate access arbitrage schemes pending appeal of Great Lakes, NVC, et al. They claimed, among other things, the order imposes new alternative tests for determining whether carriers are engaged in access stimulation, neither of which were raised in the FCC's NPRM and were adopted in violation of the notice requirements outlined in the Administrative Procedure Act. They do not request that the order be stayed with regard to any other parties who have not provided evidence to the Commission regarding the harm that the Order will have on their companies.
- The Wireline Competition Bureau issued a [public notice](#) on October 3, 2019, seeking comment on TrioTel Communications [petition](#) seeking a waiver of sections 51.917(b)(1) and 51.917(b)(7) to recalculate for merged study areas the 2011 Interstate Switched Access Revenue Requirement and 2011 Rate-of-Return Carrier Base Period Revenue necessary to determine CAF – ICC support. Comments are due October 23, 2019; replies are due November 4, 2019.
- JSI [spoke with](#) Wireline Competition Bureau staff on October 2, 2019, to urge the FCC to act on petitions for waiver to modify 2011 base period revenue filed by [Lakeland Communications Group](#) and [Sunflower Enterprises](#). JSI said both companies are facing deadlines to complete their study area mergers. JSI also discussed the need for a more streamlined process to grant similar petitions.
- The Enforcement Bureau issued a [letter ruling](#) on October 2, 2019, in the case addressing AT&T's [formal complaint](#) against Local Exchange Carriers of Michigan and/or Prime Circuits (LEC- MI), alleging LEC-MI improperly billed AT&T at least \$1,054,897 in end office access charges on aggregated 8YY traffic that AT&T paid. The Bureau granted AT&T's unopposed motion that sought to extend several filing deadlines and modified the filing schedule of this proceeding.
- FailSafe filed a [letter](#) on October 3, 2019, asking the FCC reconsider its request on exemptions of emergency services and overflow traffic it made in its September 13, 2019 [letter](#), with the purpose of differentiating FailSafe's emergency services from access stimulation traffic. FailSafe listed outages in just the past month or so and claimed each of the outages were capable of generating enormous volumes of calls to the FailSafe cloud. It asserted the Web Call Controller used by FailSafe has handled 236,967 separate calls due to carrier outages since January 1, 2019 and millions more since its inception in 2006.

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Universal Service

- The FCC released the [report and order and order on reconsideration](#) that was adopted at its September 26, 2019 Open Meeting, which allocates \$950 million in fixed and mobile high-cost universal service support for stage 2 of the Uniendo a Puerto Rico Fund and the Connect USVI Fund in Puerto Rico and the U.S. Virgin Islands. The FCC also denied two petitions related to these two funds.
- Commissioner O’Rielly [spoke](#) at the FCBA Young Lawyers Committee Universal Service Fund seminar on October 2, 2019, on eliminating duplicative funding within the various USF programs, expanding broadband, and better administration of the USF. He said the E-Rate funded overbuilding trend is the result of shortcomings in Commission rules and stricter safeguards and a better alignment of incentives are necessary. He expressed support for the Digital Opportunity Data Collection to help improve maps and give the Commission a better idea of where broadband is lacking. He also offered certain suggestions for USAC.
- The Wireline Competition Bureau and the Office of Managing Director issued a [public notice](#) on October 1, 2019, seeking comment on improving the FCC form 470 drop-down menu. Form 470 is used by E-Rate program applicants use to solicit bids from service providers for E-Rate eligible services. They seek comment on: whether and how these drop-down menu choices may be improved to minimize the potential for applicant confusion; address concerns about the current FCC Form 470 drop-down menu options; and to the extent practicable, to reduce administrative burdens on applicants and service providers. Comments are due October 31, 2019; replies are due November 15, 2019.
- Kris Monteith, Chief, Wireline Competition Bureau and Mark Stephens, Director of the Office of the Managing Director, sent a [letter](#) to USAC on October 1, 2019, to provide guidance regarding application of the E-Rate competitive bidding rules. They explained how USAC should treat E-Rate applications for which the applicant mistakenly selected a drop-down menu option on its FCC Form 470 that did not fully reflect the services for which it intended to seek bids. They also noted the FCC is seeking comment on improving the FCC Form 470 drop-down menu options to alleviate ongoing confusion.
- The Wireline Competition Bureau issued an [erratum](#) on October 4, 2019, to the [public notice](#) seeking nominations on six board member positions for the USAC board of directors. The erratum corrected the due date for nominations from October 18, 2019, to October 28, 2019.
- USAC filed its [Semi-Annual Audit Recovery Report](#) for the Schools and Libraries Program on September 30, 2019, which summarizes the status of all outstanding audit findings.
- The Wireline Competition Bureau released a [public notice](#) on September 30, 2019, granting, denying, and dismissing various petitions related to actions taken by USAC on E-Rate. Petitions for reconsideration or applications for review of these decisions must be filed within 30 days of the Public Notice.
- NECA filed its [Universal Service Fund 2019 Submission of 2018 Study Results](#) on September 30, 2019, in compliance with section 54.1307 of the FCC’s rules.
- Smith Bagley, Inc. [met with](#) Wireline Competition Bureau staff on September 25, 2019, to discuss Lifeline issues. It suggested the FCC ensure that the National Verifier be capable of electronically confirming eligibility through the Medicaid and the Supplemental Nutrition Assistance Program databases and the need for an earlier start to the annual recertification process. SBI also discussed provisions in the draft order on circulation regarding recertification and prevention of duplicate enrollment.

- TruConnect [met separately with](#) Commissioner O’Rielly and his advisor, Commissioner Rosenworcel’s advisor and Wireline Competition Bureau staff on September 26, 2019, to discuss CTIA, et al.’s [petition](#) asking the FCC to pause the December 1, 2019 implementation of an increase in the Lifeline minimum required broadband data usage allowance and the phasedown in Lifeline support for voice services. TruConnect expressed support for the petition and asserted if the Bureau does not grant the petition, Lifeline subscribers could expect an approximate \$30 per month immediate price increase causing many otherwise eligible subscribers to drop out of the program.
- Reply comments were filed on October 1, 2019, on Network Communications International’s [petition](#) for forbearance from the application of USF contribution requirements with respect to the provision of interstate and international inmate calling services. [Securus Technologies](#) said granting forbearance will promote just and reasonable rates for ICS, and make those services more affordable for users. [Global Tel*Link](#) said interstate ICS is subject to federal USF contributions that can be passed through to end users. GTL said any FCC action with respect to federal USF contribution obligations must be equitable and nondiscriminatory, competitively neutral, and not unfairly advantage or disadvantage particular service providers, technologies, or consumers. [NCIC](#) asserted all comments support its request and by eliminating the obligation ICS providers contribute to the USF, ICS customers will receive immediate relief from paying the USF fee as a passthrough from ICS providers [public notice all replies available](#)
- Reply comments were filed on September 30, 2019, on the [NPRM](#) proposing a connected care pilot. [NTCA](#) said the pilot will make most efficient use of resources if it is coordinated with other Federal programs in a manner that avoids duplicative efforts. NTCA also said a robust fiber network is necessary to support both wired and spectrum-based telemedicine applications. [CenturyLink](#) said the Commission should direct support to actual costs of broadband used for connected care services, without duplicating support or undermining existing infrastructure investment, especially in rural areas. [Comcast](#) said the health care provider or remote patient monitoring provider—not the broadband service provider—should receive disbursements directly from the Pilot program. It also said the FCC should clarify that its proposal to fund network equipment includes equipment such as modems, routers, and gateways that are necessary to make a broadband service functional. [ACA Connects](#) said the Commission should adopt its recommendation that the FCC establish an appropriate per-patient cap on support for broadband Internet access and implement measures to ensure to the greatest extent possible that health care providers’ requests for proposals elicit competitive bids. [Virginia Community Healthcare Association](#) asserted the FCC should work closely with the Centers for Medicare and Medicaid Services to pair the pilot with expansions in Medicaid and Medicare reimbursement for connected care services [FR all replies available](#)
- AASA, the School Superintendents Organization and the California County Offices of Education [met separately with](#) Chairman Pai’s legal advisor and Commissioner Rosenworcel and her legal advisor on October 2, 2019, to express concern with the proposed USF budget cap, saying it might lead to E-Rate competing with rural health clinics and hospitals. They also expressed support for the proposal in the category two NPRM to raise the current \$9,200 floor for very small school and library applicants, and for adding Wi-Fi on buses and cybersecurity as new E-Rate eligible services.
- Vantage Point Solutions, on behalf of the Cheyenne River Sioux Tribe Telephone Authority, filed a [letter](#) on October 3, 2019, withdrawing CRSTTA’s [petition](#) for ETC designation in the Timber Lake Exchange within Dewey County, South Dakota. Vantage Point said CRSTTA decided to seek ETC designation from the South Dakota PUC, so there is no longer a need for the FCC to consider this matter.
- Interstate Telecommunications Cooperative filed a [letter](#) on October 3, 2019, to provide the Wireline Competition Bureau notice of the consolidation of two Interstate South Dakota study areas- SA codes 391654 and 391679, effective January 1, 2020. ITC said SAC 391654 will be the surviving study area.
- BA Telecom filed a [request for review](#) on September 27, 2019, of a USAC decision that denied its appeal regarding Form 499 reporting. BA Telecom claimed USAC erred in combining the interstate and international end-user telecommunications revenues of BA Telecom and its Filer Affiliate, UVNV, as reported on their 2017 and 2018 Forms 499-A and November 2018 Form 499-Q, in evaluating BA

Telecom's qualification for Limited International Revenue Exemption. It asked the FCC to reverse USAC's denial of the appeal.

- No oppositions were filed on a [request](#) by the Bureau of Labor Statistics to access certain carrier revenue information for 2017 that the FCC collected from wired carriers on FCC Form 499-A. [public notice](#)
- Replies are due October 7, 2019, on Hood Canal Communications and CenturyLink's [petition](#) for a study area waiver to permit CenturyLink to remove an area that is originally within its Washington study area and for the same area to be recognized as part of HCC's Washington study area. [public notice](#)

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Misc.

- The FCC issued a [tentative agenda](#) on October 4, 2019, for its October 25, 2019 Open Meeting. The FCC will consider an [order on reconsideration](#) on CAF testing procedures and performance measures that provides flexibility for smaller carriers by making targeted modifications to the testing procedures carriers must use to show their networks perform at the Commission's speed and latency standards. The order also addresses several petitions for reconsideration and applications for review of the [2018 Performance Measures Order](#). The FCC will also consider: a [declaratory ruling](#) that would clarify section 6(f)(1) of the New and Emerging Technologies 911 Improvement Act of 2008 and ensure regulatory parity in 911 fees between VoIP services and traditional telecommunications services; a [report and order](#) that would amend its tariffing rules to better align them with the reality of easy electronic access to tariff filings; an [NPRM](#) that would seek comment on whether the common antenna siting rules for FM and TV broadcaster applicants and licensees dating back to 1945 should be revised or eliminated given the current broadcasting marketplace; a [memorandum opinion and order](#) that would find that Charter faces effective competition from AT&T's online video streaming service in franchise areas in Massachusetts and Hawaii; and an [order and sixth FNPRM](#) that would streamline rules and procedures to expedite the successful completion of the 800 MHz band reconfiguration initiative, lower program costs and administrative burdens, and continue to alleviate interference to public safety licensees.
- Chairman Pai wrote a [blog post](#) on October 3, 2019, stating he is circulating an order addressing CAF testing procedures and performance measures, which will be considered at the October 25, 2019 Open Meeting. Pai said the order would change testing implementation dates so that they are more closely aligned with when a carrier has its first mandatory build-out obligations, and creates a pre-testing period that would allow carriers to ensure that their testing systems are performing correctly before testing begins. He said the FCC will also vote on a declaratory ruling clarifying that placing discriminatory fees on VoIP subscribers is prohibited and providing examples of fees that would be discriminatory and thus legally prohibited. Pai also said the FCC will consider an order to allow carriers to cross-reference their tariffs as well as those of their affiliates, and would eliminate the requirement that price cap carriers file certain supporting information 90 days before their annual interstate access charge filings are effective.
- To date, no comments were filed on Consolidated's petition for waiver of the all-or-nothing rule. Replies are due October 21, 2019. [public notice](#)
- The [NPRM](#) proposing procedural changes that would streamline certain FCC administrative hearings was [published](#) in the Federal Register on October 7, 2019. The FCC proposed, among other things: codifying and expanding the use of a process that would rely on written testimony and documentary evidence in lieu of live testimony and cross-examination; and enabling FCC staff to act as a case manager that would supervise development of the written hearing record when the FCC designates itself as the presiding officer at a hearing. Comments are due November 6, 2019; replies are due November 21, 2019.
- The Wireline Competition Bureau issued a [public notice](#) on October 4, 2019, granting a section 214 application filed by Arcadia Telephone Cooperative, Monarc Technologies, Westside Independent

Telephone, d/b/a Western Iowa Networks, and BTC, d/b/a Western Iowa Networks, requesting consent for the transfer of the telecommunications assets of Arcadia and Monarc to Westside and BTC, respectively.

- No replies were filed on a section 214 application filed by E. Ritter & Company and Ritter Communications Ultimate Holdings, to transfer control of E. Ritter's direct subsidiary and wholly owned subsidiaries of Ritter Holdings, to Ritter Ultimate. [public notice](#)
- No comments were filed on a section 214 application filed by Lynch Telephone and CIBL, requesting consent to transfer control of Lynch's wholly owned subsidiaries, Bretton Woods Telephone and World Surfer, to CIBL. Replies are due October 8, 2019. [public notice](#)
- No comments were filed on a section 214 application filed by Cable Bahamas, Ltd. and Summit Ultimate Holdings, LLC, to transfer control of Summit Vista and its wholly owned subsidiary, Orlando Telephone d/b/a Summit Broadband, to Summit Ultimate. Replies are due October 9, 2019. [public notice](#)
- The Wireline Competition Bureau issued a [public notice](#) on September 30, 2019, granting Brightlink's application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. This proceeding will be closed 60 days from the date of this public notice if there are no further filings.
- Chairman Pai [announced](#) on September 30, 2019, Evan Swarztrauber has joined his office as a policy advisor, replacing Nathan Leamer, who recently left the Commission. Mr. Swarztrauber previously worked for Commissioner Carr as a Policy Advisor on media issues.
- The Consumer and Governmental Affairs Bureau issued an [order](#) on October 2, 2019, resolving a complaint filed against Clear Rate Communications that alleged it changed complainant's telecommunications services without obtaining authorization and verification. The Bureau said Clear Rate responded fully to the complainant's complaint and acted to resolve the complaint.

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Upcoming Filing Dates

- Oct. 8 - Replies due on a section 214 application filed by Lynch Telephone and CIBL, requesting consent to transfer control of Lynch's wholly owned subsidiaries, Bretton Woods Telephone and World Surfer, to CIBL. [public notice](#)
- Oct. 9 - Replies due on a section 214 application filed by Cable Bahamas, Ltd. and Summit Ultimate Holdings, LLC, to transfer control of Summit Vista and its wholly owned subsidiary, Orlando Telephone d/b/a Summit Broadband, to Summit Ultimate. [public notice](#)
- Oct. 11 - Comments due on a section 214 application filed by Richard W. Ryan and Hunter Communications Holdings (Hunter Holdings), to transfer control of Hunter Communications from Mr. Ryan to Hunter Holdings. Replies are due October 18, 2019. [public notice](#)
- Oct. 15 - Replies due on NECA's [2020 Modification of the Average Schedule Universal Service High Cost Loop Support Formula](#). [public notice](#)
- Oct. 18 - Replies due on a section 214 application filed by Richard W. Ryan and Hunter Communications Holdings (Hunter Holdings), to transfer control of Hunter Communications from Mr. Ryan to Hunter Holdings. [public notice](#)
- Oct. 21 - Replies due on the [NPRM](#) proposing to establish a new Rural Digital Opportunity Fund, which would target support to areas that lack 25/3 Mbps broadband service and distribute \$20.4 billion in high-cost USF support over 10 years using a two-phase reverse auction framework. [FR](#)

- Oct. 21- Replies are on Consolidated's petition for waiver of the all-or-nothing rule. [public notice](#)
- Oct. 21 - PRA comments due on the information collection requirements in the [FNPRM](#) on the new Digital Opportunity Data Collection.
- Oct. 23 - Comments due on TrioTel Communications [petition](#) seeking a waiver of sections 51.917(b)(1) and 51.917(b)(7) to recalculate for merged study areas the 2011 Interstate Switched Access Revenue Requirement and 2011 Rate-of-Return Carrier Base Period Revenue necessary to determine CAF – ICC support. Replies are due November 4, 2019. [public notice](#)
- Oct. 29 - Comments due on WIA's petitions for [rulemaking](#) and [declaratory ruling](#) regarding section 6409(a) of the Spectrum Act of 2012, and CTIA's [petition for declaratory ruling](#) regarding section 6409 and the rules implementing section 224 of the Communications Act. Reply comments are due November 13, 2019. [public notice](#), [order](#)
- Oct. 31 - Comments due on improving the FCC form 470 drop-down menu. Form 470 is used by E-Rate program applicants use to solicit bids from service providers for E-Rate eligible services. Replies are due November 15, 2019. [public notice](#)
- Nov. 4 - Replies due on TrioTel Communications [petition](#) seeking a waiver of sections 51.917(b)(1) and 51.917(b)(7) to recalculate for merged study areas the 2011 Interstate Switched Access Revenue Requirement and 2011 Rate-of-Return Carrier Base Period Revenue necessary to determine CAF – ICC support. [public notice](#)
- Nov. 6 - Comments due on the [NPRM](#) proposing procedural changes that would streamline certain FCC administrative hearings. Replies are due November 21, 2019. [FR](#)
- Nov. 13 - Replies due on WIA's petitions for [rulemaking](#) and [declaratory ruling](#) regarding section 6409(a) of the Spectrum Act of 2012, and CTIA's [petition for declaratory ruling](#) regarding section 6409 and the rules implementing section 224 of the Communications Act. [public notice](#), [order](#)
- Nov. 15 - Replies due on improving the FCC form 470 drop-down menu. Form 470 is used by E-Rate program applicants use to solicit bids from service providers for E-Rate eligible services. [public notice](#)
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