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October 16, 2017 HIGHLIGHTS

- The FCC issued a [Notice](#) in the Federal Register seeking PRA comments on an extension of a currently approved information collection associated with qualified 4G LTE coverage data collection for Mobility Fund Phase II. PRA comments are due December 12, 2017.
- [Replies were filed](#) on the list of 13 rate-of-return study areas identified as potentially having 100 percent overlap by an unsubsidized competitor or combination of unsubsidized competitors. [PN](#)
- Comments were filed by [NCAI](#) and [Alexicon Telecom Consulting](#) on Gila River Telecommunications' [Petition](#) for Expedited Waiver of the FCC's National Average Cost Per Loop freeze decision. Replies due October 24, 2017. [Public Notice](#)
- NTCA [discussed](#) outstanding issues relating to High-Cost USF reforms.
- Alaska Telephone Association filed a [Petition for Reconsideration](#) of certain mapping reporting requirements contained in the September 8, 2017 [Public Notice](#).
- The FCC [seeks PRA comments](#) on an extension of a previously approved information collection associated with Form 480 (Rural Call Completion Data). PRA comments are due December 15, 2017.
- NTCA [discussed](#) rural call completion issues and a recent rise in complaints. NTCA urged the FCC to not repeal the current record keeping and reporting requirements until an effective replacement is identified and implemented.
- [Replies were filed](#) on the [Thirteenth Section 706 Report NOI](#).
- [Comments were filed](#) on the [FNPRM](#) on how to collect better and more accurate information on Form 477. Replies are due October 24, 2017.
- Chairman Pai [spoke](#) at the Ronald Reagan Presidential Library, discussing ways to bridge the digital divide. Commissioner Clyburn [spoke at](#) the Montana High Tech Jobs Summit, discussing broadband deployment. Commissioner Rosenworcel [spoke](#) before the Senate Committee on Commerce, Science, and Transportation, stating there needs to be better broadband availability mapping. She also [spoke at](#) the U.S. Conference of Catholic Bishops, discussing net neutrality and the Homework Gap.
- The FCC [announced](#) the OMB approved the information collection associated with the network change disclosure rules for copper retirement notices contained in the July 15, 2016 [Second Report and Order and Order on Reconsideration](#).
- [Comments were filed](#) on the status of competition in the market for the delivery of video programming. Replies are due November 9, 2017. [Public Notice](#)

Other Key Upcoming Dates

- Oct. 18 - Replies [due](#) on the proposed application and bidding procedures for CAF Phase II auction.
- Oct. 26 - Comments [due](#) on updating the record on ICC reform issues on regarding the network edge for traffic that interconnects with the PSTN, tandem switching and transport, and transit. Replies due November 13, 2017.

USF Reform

- The FCC issued a [Notice](#) in the Federal Register on October 13, 2017, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with qualified 4G LTE coverage data collection for Mobility Fund Phase II. In the August 4, 2017, [Order on Reconsideration and Second Report and Order](#), the FCC, among other things, reconsidered its decision to use FCC Form 477 data to compile the map of areas presumptively eligible for MF–II support, and decided instead it would conduct a new, one-time data collection of 4G LTE coverage data that will be used for this purpose. PRA comments are due December 12, 2017.
- Reply comments were filed on October 10, 2017, on the list of 13 rate-of-return study areas identified as potentially having 100 percent overlap by an unsubsidized competitor or combination of unsubsidized competitors. [GVNW filed on behalf of Home Telephone](#), claiming the 100 percent overlap determination fails because AT&T does not provide service within the study area of HomeTel, and said Wisper ISP has been shown not to provide service to 100 percent of the locations in HomeTel's study area. [Beresford Municipal Telephone](#) refuted the Bureau's preliminary finding of 100 percent competitive overlap in the Beresford's study area, and claimed that in August 2017 Jefferson Communications submitted a letter to Beresford informing that it does not provide broadband service to subscribers in Beresford. Beresford also claimed it has information provided by subscribers which it says shows Skybeam is unable to serve all subscribers in Beresford's study area. [Faith Municipal Telephone](#) refuted the Bureau's preliminary finding of 100 percent competitive overlap in its study area, asserting it is the only service provider within the town of Faith. Faith claimed that although Golden West provides service in areas outside the town of Faith it does not provide service within the town of Faith itself. Vantage Point Solutions filing on behalf of [Farmers Telephone Co-Batavia](#), claimed Natel is unable to provide qualified service to all locations in at least two census blocks and submitted two sworn statements as evidence. Vantage Point Solutions claimed the Bureau's determination is incorrect, and asserted Batavia is not 100 percent overlapped by an unsubsidized competitor. Vantage Point also filed on behalf of [Winn Telephone](#), claiming CMSInter.Net is unable to provide qualified service to all locations in at least 2 census blocks and submitted two sworn statements as evidence. [All replies available to date. Public Notice](#)
- Comments were filed on October 9, 2017, on Gila River Telecommunications' [Petition](#) for Expedited Waiver of the FCC's National Average Cost Per Loop freeze decision and its two submissions of revised information for the same purpose. [The National Congress of American Indians](#) expressed support for GRTI's request, asserting the short time frame given to providers leaves GRTI and other carriers facing these cuts with virtually no time to make adjustments for expenses. NCAI asserted some sort of transition should have been afforded GRTI and similarly-situated carriers, and supported GRTI's request for a five-year transition so it can make adjustments in its finances regarding this ruling. [Alexicon Telecom Consulting](#) supported the petition, claiming the petition demonstrates strict compliance with the Commission's NACPL freeze decision is inconsistent with the public interest. Replies due October 24, 2017. [Public Notice](#)
- NTCA [met with](#) Commissioner O'Rielly's Legal Advisor on October 10, 2017, to discuss the need to address outstanding issues relating to High-Cost USF reforms. NTCA discussed a path toward helping to mitigate the insufficiency of USF support, greater prospective confirmation as to the eligibility of certain expenses for cost recovery, and action on other previously identified punch list items. NTCA also discussed the need for all stakeholders to obtain greater visibility and firm assurance that USF resources will be both sufficient and dedicated to carry out their intended purposes in connection with any potential changes in the administration and custody of those funds.
- Alaska Telephone Association filed a [Petition for Reconsideration](#) on October 10, 2017, of certain mapping reporting requirements contained in the [Public Notice](#) issued by Wireline Competition and Wireless Telecommunications Bureaus on September 8, 2017. ATA claimed the details of the data collection as adopted by the Bureaus go beyond what is needed to accomplish the Commission's goals. ATA claimed the collection of the information would be extremely expensive and burdensome by mandating a level of accuracy completely unnecessary for monitoring middle mile facilities to a

community, rather than a specific site. ATA also asserted the March 1, 2018 deadline is unrealistic given Alaska's unique climate and geography.

- Allband Communications Cooperative and JSI [spoke with](#) Chairman Pai's Legal Advisor and Wireline Competition Bureau staff on October 11, 2017, to discuss the status of the Allband's [Emergency Petition](#) for Interim Partial Waiver of section 54.302 and for increased per-line support, filed on July 27, 2017. They reiterated the urgency of the matter, claiming Allband is experiencing considerable financial harm during the resolution of its Petition.
- Alaska Communications [met with](#) Wireline Competition Bureau staff on October 10 and 11, 2017, to discuss its November 2016 [Petition for Reconsideration](#) of the meaning of "high-cost" in the context of the Order establishing voice and broadband service obligations for Alaska Communications. Alaska Communications urged FCC relief from the definition of "high-cost" as at least \$5,000 for purposes of evaluating whether any unserved location in census blocks deemed "low-cost" under the Commission's Connect America Model are, in fact, "high-cost" locations within the meaning of the model. Alaska Communications said failure to grant this Petition will significantly add to the difficulty of completing its CAF II deployment plan.

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ICC

- Teliax met with Legal Advisors to [Chairman Pai](#) and Commissioners [Carr](#), [O'Reilly](#), and [Clyburn](#) on October 10 and 11, 2017, to discuss originating and toll free access. Teliax claimed the existing rules for originating and toll free access enables quality service, competition, economic growth, employment and innovation, including Teliax's Toll Free Exchange. Teliax also claimed AT&T's proposal to make end user customers pay for toll free calls could result in the demise of toll free calling and is inconsistent with the public interest.

Broadband

- Chairman Pai [spoke](#) at the Ronald Reagan Presidential Library on October 10, 2017, to discuss bridging the digital divide. He said in urban areas, only 2 percent of residents lack access to high-speed fixed service; but in rural areas, over one-quarter of residents do not. He also noted 93 percent of Americans earning more than \$75,000 have home broadband service; but barely half of those making less than \$30,000 do. He said the most powerful tool for expanding digital opportunity is market-based, light-touch regulation and said this maximizes private investment in high-speed networks. He also said the FCC is trying to make it easier for new technologies and services to enter the marketplace, has approved the next generation of satellite constellations, encouraged new fixed wireless companies to innovate, and proposed to make it easier for small fiber companies to string lines.
- Commissioner Rosenworcel [spoke](#) before the Senate Committee on Commerce, Science, and Transportation on October 13, 2017, on broadband infrastructure in New Hampshire. Rosenworcel said there needs to be better broadband availability mapping, noting the National Broadband was last updated over three years ago. She said she created an FCC email account so those without service can report it and help make a broadband map. She also said wireless service is an essential part of digital age infrastructure, and said the AIRWAVES Act helps identify more licensed and unlicensed spectrum that can be brought to market to improve wireless broadband, and sets up a fund whereby auction revenues will help support wireless broadband infrastructure in rural America. She also said according to the Senate Joint Economic Committee, the Homework Gap affects 12 million children across the country.
- Commissioner Clyburn [spoke at](#) the Montana High Tech Jobs Summit on October 9, 2017, to discuss broadband and other issues. She said the Commission has adopted a series of items, geared towards making companies compete for funding to serve areas that remain unserved and it will be reverse-

auctioning billions of dollars, to build out fixed and mobile broadband, in the hardest to reach communities in the country. She also said the Commission is planning to make structural changes to its rules to make it easier for companies to deploy broadband.

- Reply comments were filed October 6, 2017, on the [Thirteenth Section 706 Report NOI](#) on the appropriate metrics and benchmarks by which to measure the deployment of both fixed and mobile services to evaluate the extent to which American consumers have access to advanced telecommunications capabilities. [AT&T](#) asserted comments filed in this proceeding demonstrate the Commission should adopt its proposal to incorporate both fixed and mobile advanced telecommunications services into the section 706 inquiry, and that the FCC should find that advanced services capability has been deployed to an area if it has either a fixed or mobile broadband service. [NTCA](#) said to the extent the section 706 benchmark must focus upon static speed figures, NTCA supported the NOI's proposal to retain the 25/3 Mbps speed benchmark for fixed wireline broadband Internet access service. NTCA said the section 706 inquiry should focus on sustainability, and said particularly in high cost rural areas, sustainable advancement depends in large part on community-wide access where users of all kinds can benefit from and make effective and increasing use over time of a robust broadband network. [Comcast](#) suggested the FCC find that advanced telecommunications capability is being reasonably and timely deployed, continue to develop and implement solutions to increase the availability of broadband in unserved rural areas and track and report on broadband deployment progress at multiple speed benchmarks, including some lower than 25/3 Mbps. [CTIA](#) suggested that in order to maintain the reasonable and timely deployment of mobile broadband the FCC should pursue regulatory policies that will positively spur continued deployment, including making more spectrum available for broadband services, eliminating unwarranted delays in infrastructure deployment, removing the burdens of Title II regulation of broadband services, and providing timely and sufficient universal service support. The [Fiber Broadband Association](#) claimed policy reforms such as adoption of a one-touch, make-ready regime for pole attachments, clarification of the limitations on state and local authority under section 253, repeal of the 2015 network change notification rule, and reclassifying broadband Internet access service as an information service will have a meaningful impact on providers' ability to rapidly deploy advanced telecommunications services. The [Open Technology Institute at New America](#) stated the FCC should acknowledge that mobile BIAS is not a substitute for fixed BIAS and should not measure advanced telecommunications deployment on the presence of either mobile BIAS or fixed BIAS. OTI asserted to the extent the Commission analyzes mobile BIAS as part of its section 706 inquiry, it must measure deployment with the same benchmarks it uses for other broadband technologies. [WISPA](#) said the FCC should retain its existing criteria for defining advanced telecommunications capability, and opposed the technology-specific proposal by the Fiber Broadband Association to use the deployment of all-fiber networks as a benchmark for advanced telecommunications capability. [All replies available to date.](#)
- Comments were filed on the [FNPRM](#) on how to collect better and more accurate information on Form 477. [NTCA](#) recommended the FCC confirm the data sets that are necessary to inform sound policy decisions, and to limit collections to those data for which the Commission has a legitimate statutory or regulatory need. NTCA said these include verifying areas in which competitors may or may not be present to determine distribution of high-cost USF support. NTCA also said the Form 477 reporting obligations should be reduced from semi-annual to annual. [WTA](#) supported an annual Form 477 filing requirement to replace the current semi-annual filings. WTA opposed the contemplated change that would make public on a national level the number of each filer's subscribers at each reported speed, stating it will effectively disaggregate and make public the proprietary and confidential subscriber information of filers that serve only a few states and study areas. WTA also asserted that due to the accuracy issues regarding geocoding, the Commission should retain census block level reporting for FCC Form 477 data collections. [Verizon](#) said if the Commission decides to change the existing mobile broadband availability data it collects, it should follow the lessons learned in the Mobility Fund proceeding, rather than create another new set of requirements for the mobile broadband availability maps it collects under Form 477. Verizon also said the Commission should not require providers to submit "on the ground" data as a separate part of Form 477 data collection, and claimed these data would be redundant and inconsistent across providers. Verizon also supported changing the frequency of Form 477 data to once per year. [USTelecom](#) asserted requiring the collection and submission of more granular data would be unduly burdensome to providers and is simply unnecessary, and claimed the massive amount of data generated would likely not be nearly as accurate as the data the

Commission has today, and would not be useful in furthering any of the Commission's policy goals. USTelecom also supported the FCC's proposal to move from a semiannual collection of the FCC Form 477 to an annual collection. [AT&T](#) suggested the FCC update the mobile broadband deployment collection to require mobile broadband service providers to submit coverage maps depicting the service area by technology based on a propagation model using standardized modeling parameters established by the Commission as it did in the Mobility Fund Phase II proceeding. AT&T also claimed moving to an annual filing requirement would cut the current burden in half without impairing the Commission's ability to fulfill its statutory obligations under the Act. The [Small Company Coalition](#) urged the FCC to reduce the filing frequency for Form 477 to annually for small carriers, and said this reduction in filing frequency will be crucial should the Commission decide to increase the granularity of the data to be reported. [INCOMPAS](#) focused on the collection of information on business data services, suggesting Form 477 collect the number of facilities-based connections for BDS services that each provider has by census block by guaranteed data throughput rate. INCOMPAS said the Commission should assess whether the predicted impact of actions it has taken with regard to the deployment of BDS facilities have proven to be accurate. The [West Virginia Broadband Enhancement Council](#) suggested the FCC collect address-level data to ensure and enhance broadband access and recommended the Commission maintain semi-annual Form 477 reporting. Additionally, it said the FCC should accept actual "on-the-ground" service data or alternate datasets from state agencies that are based on speed-test results collected from the public and suggested that state broadband agencies, councils and authorities, and state attorneys general should have full access to data. The [California PUC](#) supported an annual Form 477 reporting requirement, instead of every six months, and supported requiring collection of broadband deployment and mobile broadband and voice subscription data at a more granular geographic level. The [National Digital Inclusion Alliance](#) suggested each provider be required to list, for each home broadband technology deployed, the speed tiers provided via that technology to households in each block, and the number of households in the block for which each tier is the maximum available. [All comments available to date](#). Replies are due October 24, 2017.

- R Street Institute [met with](#) Chairman Pai's Legal Advisor and Policy Advisor on October 4, 2017, to discuss broadband deployment. R Street discussed how the Commission can accelerate broadband deployment, including the proposal to require fees for accessing public rights of way to be based on the costs incurred in managing the rights of way and facilitating access thereto, rather than based on a mistaken conception of market price. R Street also discussed the section 706 report and urged the Commission to report the deployment data in an objective fashion, perhaps using multiple benchmarks or metrics.
- Google Fiber [met with](#) Legal Advisors to Commissioner Carr and Rosenworcel and [with](#) Wireline Competition Bureau and Office of Strategic Planning staff on October 10, 2017, to discuss Google Fiber's position addressing concerns that use of one-touch make-ready procedures might cause damage to existing facilities or violate labor agreements to which Google Fiber is not a party. Google Fiber also discussed current developments from the BDAC working groups and whether the Commission has sources of authority that would enable it to grant attachment rights to providers that are not telecommunications providers or cable operators.
- The American Public Power Association [met with](#) Chairman Pai's Legal Advisors and [Wireless Telecommunications Bureau staff](#) on October 12, 2017, to discuss pole attachments to public power utility poles. APPA said its remarks were consistent with its filed comments and reply comments in the wireline and wireless infrastructure proceedings.

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Open Internet

- Commissioner Rosenworcel [spoke at](#) the U.S. Conference of Catholic Bishops on October 12, 2017, and discussed net neutrality and the Homework Gap. She expressed concern with the proceeding to revisit the current open Internet rules, and asserted this new proposal seeks to offer broadband providers the power to favor sites, content, and ideas and to discriminate traffic and to become censors and gatekeepers. She suggested the FCC help close the Homework Gap by unleashing more

unlicensed spectrum, providing more Wi-Fi in more places and resulting in more places to do schoolwork.

- The American Council on Education, EDUCASE, Association of American Universities, and the Association of Research Libraries [met with](#) staff from Wireline Competition and Wireless Telecommunications Bureaus on October 6, 2017, to discuss the open Internet proceeding. They asserted an open Internet supported through enforceable net neutrality rules is critical to the educational, research and public service missions of higher education institutions and research libraries. They reiterated their preference for maintaining current rules applicable to both fixed and wireless broadband supported by Title II, and said reclassification of public broadband Internet access service will be disruptive and is unnecessary.
- Alaska Communications [met with](#) Legal Advisors to Chairman Pai and Commissioners Clyburn, O’Rielly, Carr and Rosenworcel on October 10 and 11, 2017, to discuss open internet issues. Alaska Communication asserted the FCC failure to definitively classify VoIP over broadband as an information service puts many service providers at a competitive disadvantage vis-à-vis other VoIP providers. Alaska Communications also said the regulatory uncertainty that exists under an incomplete patchwork of federal, state and local rulings has discouraged Alaska Communications from investing in and deploying advanced VoIP services, and said the FCC should definitively rule that VoIP over broadband is an interstate information service.
- ADT [met with](#) Legal Advisors to Chairman Pai, Commissioners Clyburn and Carr and Wireline Competition Bureau staff on October 12, 2017, to discuss its concerns regarding blocking of ADT’s alarm data. ADT asserted that the FCC could rely on section 275 to provide ancillary jurisdiction to adopt core net neutrality rules barring blocking, throttling or anticompetitive prioritization by broadband providers offering competitive alarm monitoring services. ADT also [met with](#) Legal Advisors to Commissioners O’Rielly and Rosenworcel on October 10, 2017, to discuss the same issues.
- Brent Skorup, research fellow at the Mercatus Center at GMU, [met with](#) Commissioner Carr’s Chief of Staff on October 11, 2017, to discuss First Amendment vulnerabilities of the 2015 Open Internet Order. He claimed the Order imposes content-based burdens on media distributors that cannot survive strict scrutiny from a court and asserted the Order, at best, is ineffective at encouraging net neutrality reforms. He also expressed support for elimination of the paid prioritization ban.

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Call Completion

- The FCC issued a [Notice](#) in the Federal Register on October 16, 2017, seeking Paperwork Reduction Act comments on an extension of a previously approved information collection associated with Form 480 (Rural Call Completion Data). The FCC estimated approximately 60 wireline, wireless, and wholesale providers are affected by this collection, and replaced the previously-estimated number of respondents of 225. PRA comments are due December 15, 2017.
- NTCA [met with](#) Wireline Competition Bureau and Enforcement Bureau staff on October 10, 2017, to discuss the rural call completion issues and a recent rise in complaints. NTCA asserted the Commission must not permit providers to use the fact that it costs more to terminate calls in rural areas as justification or excuse for not completing calls to rural consumers, as they are legally obligated to do, and said providers who fail to complete calls should be subject to enforcement action. NTCA urged the FCC to not repeal the current record keeping and reporting requirements until an effective replacement is identified and implemented. However, if the current requirements are repealed, NTCA recommended the Commission require providers to actively manage their networks and least cost routers, consistent with the ATIS best practices.

IP Transition

- The FCC published a [Notice](#) in the Federal Register on October 11, 2017, announcing the Office of Management and Budget has approved, for a period of three years, the information collection associated with the Commission's network change disclosure rules pertaining to copper retirement notices contained in the July 15, 2016 [Second Report and Order and Order on Reconsideration](#). The amendment to section 51.329(c)(1) (network change disclosure notices) is effective on October 11, 2017.
- Ultratec [spoke with](#) Wireline Competition Bureau, Consumer and Governmental Affairs Bureau, and Disability Rights Office staff on October 12, 2017, to discuss how TTYs and analog captioned telephone services are affected by the telecommunications network transition from analog to IP-based services. Ultratec asserted TTYs that use low speed tone based signaling can sometimes work on IP based services, but there are a number of characteristics of some IP networks that may result in inconsistent or poor performance. Ultratec claimed while some commenters have stated that their digital or IP networks are compatible with TTY services, Ultratec is unaware of any testing to confirm the compatibility. An [ex parte](#) of the same meeting was filed by the Director of the Gallaudet University Technology Access Program and a University of Maryland professor.

Universal Service

- The Wireline Competition Bureau issued an [Erratum](#) on October 6, 2017, to its October 2, 2017, [Report](#) on voice services in the E-rate program. The Erratum makes corrections to the text of the Report, as well as to Appendices A, C and E.
- The Wireline Competition Bureau released an [Order](#) on October 12, 2017, waiving on a one-time basis, Rural Healthcare rules under sections 54.603, 54.615, and 54.642, to enable rural health care providers who have entered into service contracts with Network Services Solutions to select a replacement service provider without initiating a new competitive bidding process. The Bureau said NSS is currently in Chapter 7 bankruptcy proceedings, and the imminent loss of service by these HCPs, warrant a waiver of FCC rules. The Bureau directed USAC to process applications submitted in response to this waiver expeditiously.
- USTelecom [met with](#) Wireline Competition Bureau staff on October 11, 2017, to discuss outstanding issues contained in its [Petition for Reconsideration](#). USTelecom said that the FCC should eliminate the change in its rules that requires the National Verifier to send and for providers to obtain, copies of customer certifications. USTelecom also said the Commission should amend its rules to specify that a provider is not required to retain any eligibility or recertification information for any subscriber for more than three years after the National Verifier has first recertified such subscriber.
- Alaska Communications [met with](#) Legal Advisors to Chairman Pai and Commissioners Clyburn, O'Rielly, Carr and Rosenworcel on October 10 and 11, 2017 to reiterate its concerns about the resolution of Funding Year 2016 rural health care funding requests. It discussed the likelihood of an even greater funding shortfall in FY 2017 and the impact this is having on the delivery of health care in rural parts of Alaska. Alaska Communications urged the Commission to begin crafting both near-term and long-term solutions to this funding crisis including.
- T-Mobile sent a [letter](#) to Chairman Pai and the FCC Commissioners on October 11, 2017, to detail its efforts in restoring service in Puerto Rico. T-Mobile also said on behalf of its subsidiary SunCom Wireless Puerto Rico, it will accept accelerated Universal Service support to help restore service in Puerto Rico. T-Mobile said the accelerated support bolsters its efforts and is the type of private-public partnership envisioned by the USF, and will help restore badly damaged infrastructure, including antennas, transmitters, transmission lines, and other related equipment.

- Boomerang Wireless and Global Connection filed a [letter](#) on October 10, 2017, to express support for Telrite's [Emergency Petition](#) asking the Commission to immediately make available a recovery package to Lifeline subscribers in Puerto Rico and the U.S. Virgin Islands. They also responded to petitions filed by [Viya](#) and [Open Mobile](#) and claimed those petitions would limit the availability of the enhanced support to subscribers of facilities-based ETCs. Boomerang and Global Connection suggested the FCC deny those proposals, and instead grant Telrite's proposal to make available to all eligible Lifeline subscribers in Puerto Rico and the U.S. Virgin Islands up to an additional \$25 per month of enhanced Lifeline support for six months.
- Interstate Telecommunications Cooperative and CenturyLink filed a [request](#) to withdraw their study area waiver petition on October 6, 2017. They said the purpose of the waiver was to address a discrepancy between the study area boundary map and actual practice. They claimed the requested waiver is not necessary to make the correction identified in the petition.

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Misc.

- Comments were filed on October 10, 2017, on the status of competition in the market for the delivery of video programming. [NTCA](#) asserted the Commission should address the outdated retransmission consent regime and take steps to inject transparency and market forces into an artificial regulatory-supported regime that has undermined the viability of rural video providers. [WTA](#) said current industry practices have made it difficult for small, rural MVPDs to offer video at competitive prices and recommended the Commission adopt policies that protect small MVPDs in retransmission consent agreements, especially as broadcasters are introducing the "Next Generation" broadcasting standard. [Verizon](#) urged the Commission to reform retransmission consent and confirm online video distributors are not subject to legacy cable regulation, such as franchising. [ITTA](#) urged the Commission to acknowledge the challenges smaller and new entrant MVPDs continue to experience with obtaining access to content on reasonable rates, terms and conditions and it must move forward with long overdue reform of its video rules. [INCOMPAS](#) claimed rising content costs have hindered the ability of competitive network providers to secure the rights to video programming and slowed wireline broadband competition and deployment. [Free State Foundation](#) asserted the Commission should eliminate its legacy video rules where possible or reform them by making them less intrusive and costly and sunset its video navigation device regulations. [All comments available to date](#). Replies are due November 9, 2017. [Public Notice](#)
- Sens. John Thune (R-S.D.) and Jerry Moran (R-Kan.) sent a [letter](#) to Adrian Abramovich of Marketing Strategy Leaders on October 11, 2017, to request information about alleged actions, including records of robocalls made by his business and its relationship to other businesses and contractors. The FCC issued a [Notice of Apparent Liability](#) for Forfeiture to Abramovich in June 2017, for allegedly making 96 million spoofed robocalls. Replies are due October 24, 2017. [press release](#)
- Shockey Consulting [met with](#) Chairman Pai's Legal Advisor, Wireline Competition Bureau and Public Safety Homeland Security Bureau staff, and the FCC Chief Technology Officer on October 5, 2017, to discuss robocalls. Shockey Consult said the STIR/SHAKEN framework developed by the SIP Forum and ATIS Joint Task Force is the best current technology address robocalls and Caller ID spoofing, and encouraged the FCC to proceed to issuing an NPRM.
- The House Subcommittee on Communications and Technology [held a markup session](#) on October 11, 2017, and approved draft [legislation](#) on reauthorizing and reforming the FCC. The bill provides for certain procedural changes to FCC rules to maximize opportunities for public participation and efficient decision making, as well as other purposes. The bill now moves on to the full committee for a vote. Commissioner O'Rielly issued a [statement](#).
- Champaign Telephone Company filed a [Petition for Waiver](#) on October 11, 2017, of the requirement adopted in the 1980s' cost separation proceeding that "investments once allocated to nonregulated

use may not be reallocated to regulated use,” consistent with the waiver process contemplated at that time.” CTC asserted by granting this waiver, CTC would be allowed to return its loop investment to regulated costs, which will bring CTC into compliance with the Commission’s cost separations requirements, will be consistent with the 2016 Rate-of-Return Order, and will further the Commission’s objective of supporting broadband-capable networks in areas served by rate-of-return carriers.

- Reply comments were filed on October 13, 2017, on the [NPRM](#) that proposes to amend rules to prohibit carriers from misrepresenting themselves when placing telemarketing sales calls to consumers and placing unauthorized charges on their phone bills. [CenturyLink](#) asserted that rather than adopting rules that are overbroad and risk unintended competitive consequences for questionable consumer benefit, the FCC should instead focus adopting targeted regulation only when it is clear that the benefits will outweigh the costs. [INCOMPAS](#) urged the Commission to reject its current proposals for mandating a PIC freeze and a double check requirement for consumers to switch carriers. [ATIS](#) expressed opposition to the FCC’s proposal to eliminate the opt-in requirement for PIC freezes. The [Pennsylvania PUC](#) asserted the cramming prohibition should be codified and extended to all providers of voice communications, regardless of technology, including wireless and interconnected VoIP. [Notice](#)
- Alaska Communications [met with](#) Wireline Competition Bureau staff on October 10, 2017, to discuss its July 2017 [Petition](#) seeking a ruling that GCI be treated as the sole ILEC in the ACS of Anchorage study area. Alaska Communications summarized the basis for the requested relief, and said it intends to supplement the record with answers to questions raised in the meeting.
- The FCC published in the [Federal Register](#) on October 13, 2017, the [NPRM](#) allowing the FCC to assign toll-free numbers by auction, on a first-come, first-served basis, by an alternative assignment methodology, or by a combination of methodologies. The NPRM also seeks comment on whether to consider changes to overall toll-free number administration. Comments are due November 13, 2017; replies are due December 12, 2017. The Wireline Competition Bureau also issued a [Public Notice](#) on October 13, 2017, announcing comment and reply dates.
- The FCC issued a [Public Notice](#) on October 13, 2017, establishing a pleading cycle for comments on a [request](#) filed by the U.S. Department of Justice asking for access to the information contained in each Number Resource Utilization and Forecast report from December 2015 through the present submitted by wireless carriers and LNP data related to wireless telecommunications carriers from January 2016 to the present. The DOJ said this information assist them in its ongoing efforts to monitor competition in the mobile wireless industry, and to be prepared for any future antitrust investigations. Comments are due October 24, 2017.
- The Wireline Competition Bureau issued a [Public Notice](#) on October 11, 2017, seeking comment on Invoxio’s application seeking authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. Comments are due October 26, 2017.

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Upcoming Filing Dates

- Oct. 16 - PRA comments on a revised information collection associated with the Business Data Services [Order](#). The information collection reforms the business data services/special access regulations for incumbent and competitive LECs. [Notice](#)
- Oct. 16 - PRA comments due on an extension of a currently approved information collection implementing the statutory obligations of section 222 regarding CPNI. [Notice](#)
- Oct. 18 - Replies due on the proposed application and bidding procedures for CAF Phase II auction, including how interested parties can qualify to participate in the auction, how bidders will submit their bids, and how the FCC will process bids to determine the winners and support amounts. [Public Notice](#)

- Oct. 20 - Replies due on NECA's [2018 Modification](#) of the Average Schedule Universal Service High Cost Loop Support Formula. [Public Notice](#)
- Oct. 23 - PRA comments due on information collections relating to Telecommunications Reporting Worksheets and Related Collections, FCC Forms 499–A and 499–Q. [Notice](#)
- Oct. 23 - Comments due on the sufficiency of budgets for Category Two services under the E-rate program. Replies are due November 7, 2017. [Public Notice](#)
- Oct. 23 - Comments due on Telapex's [Petition for Waiver](#) of sections 51.909(a), 51.917(b)(1), and 51.917(b)(7), to allow it to recalculate the rate bands and charges for local switching, tandem switching, and dedicated transport services for two commonly-owned and merged study areas in the same state, Franklin Telephone and Delta Telephone. Replies are due November 7, 2017. [Public Notice](#)
- Oct. 23 - Due date for entities to submit contact information for the filing of 4G LTE coverage data. [Public Notice](#)
- Oct. 24 - Replies due on Gila River Telecommunications' [Petition for Expedited Waiver](#) of the National Average Cost Per Loop freeze decision and its two submissions of revised information for the same purpose. [Public Notice](#)
- Oct. 24 - Replies due on the [FNPRM](#) that seeks comment on how to collect better and more accurate information on Form 477. [FR](#), [Order](#)
- Oct. 24 - Comments due on [request](#) filed by the U.S. Department of Justice asking for access to the information contained in each Number Resource Utilization and Forecast report from December 2015 through the present submitted by wireless carriers and LNP data related to wireless telecommunications carriers from January 2016 to the present. [Public Notice](#)
- Oct. 26 - Comments due on Invoxio's application seeking authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)
- Oct. 26 - Comments due on the [NPRM](#) proposing to streamline and consolidate the procedural rules governing formal complaints filed under section 208, pole attachment complaints filed under section 224, and formal advanced communications services and equipment complaints filed under sections 255, 716, and 718. Replies are due November 13, 2017. [FR](#)
- Oct. 26 - Comments due on updating the record on ICC reform issues raised in the 2011 ICC Transformation FNPRM regarding the network edge for traffic that interconnects with the PSTN, tandem switching and transport, and transit. Replies are due November 13, 2017. [Public Notice](#), [Notice](#)
- Oct. 27 - Nominations due for six members for the USAC Board of Directors. [Public Notice](#)
- Nov. 1 - Replies due on the [Notice of Inquiry](#) on potential opportunities for additional flexible access in spectrum bands between 3.7 and 24 GHz, particularly for wireless broadband services.
- Nov. 7 - Replies due on the sufficiency of budgets for Category Two services under the E-rate program. [Public Notice](#)
- Nov. 7 - Replies due on Telapex's [Petition for Waiver](#) of sections 51.909(a), 51.917(b)(1), and 51.917(b)(7), to allow it to recalculate the rate bands and charges for local switching, tandem switching, and dedicated transport services for two commonly-owned and merged study areas in the same state, Franklin Telephone and Delta Telephone. [Public Notice](#)

- Nov. 9 - Replies due on the [Public Notice](#) seeking data, information, and comment for the FCC's Nineteenth Report on the status of competition in the market for the delivery of video programming.
- Nov. 13 - Comments due on the [NPRM](#) allowing the FCC to assign toll-free numbers by auction, on a first-come, first-served basis, by an alternative assignment methodology, or by a combination of methodologies. Replies are due December 12, 2017. [Federal Register](#)
- Nov. 13 - PRA comments due on an extension of a currently approved information collection on the application for Mobility Fund Phase I Support, FCC Form 680. [Notice](#)
- Nov. 13 - PRA comments due on a revised information collection associated with new forms for the Lifeline program for consumer enrollment and certification, recertification, and one-per household verification. This revision also implements the transition to payment of the Lifeline reimbursement to ETCs based on data from USAC's NLAD database. [Notice](#)
- Nov. 13 - Replies due on updating the record on ICC reform issues raised in the 2011 ICC Transformation FNPRM regarding the network edge for traffic that interconnects with the PSTN, tandem switching and transport, and transit. [Public Notice](#), [Notice](#)
- Nov. 13 - Replies due on the [NPRM](#) proposing to streamline and consolidate the procedural rules governing formal complaints filed under section 208, pole attachment complaints filed under section 224, and formal advanced communications services and equipment complaints filed under sections 255, 716, and 718. [FR](#)
- Nov. 14 - PRA comments due on an extension of a currently approved information collection on actual speeds and performance of fixed and mobile broadband connections delivered to consumers by ISPs. [Notice](#)
- Nov. 27 - PRA comments due on revisions to a currently approved information collection to meet the requirement that certain carriers with high cost reporting obligations file information about their locations which meet their broadband deployment obligations via USAC's electronic portal. [Notice](#)
- Dec. 5 - PRA comments due on a new information collection associated with the Mobility Fund Phase II challenge process. [Notice](#)
- Dec. 12 - PRA comments on an extension of a currently approved information collection associated with qualified 4G LTE coverage data collection for Mobility Fund Phase II. [Notice](#)
- Dec. 12 - Replies due on the [NPRM](#) allowing the FCC to assign toll-free numbers by auction, on a first-come, first-served basis, by an alternative assignment methodology, or by a combination of methodologies. [Federal Register](#)
- Dec. 15 - PRA comments due on an extension of a previously approved information collection associated with Form 480 (Rural Call Completion Data). [Notice](#)
- Jan. 4 - Due date for the filing of 4G LTE coverage data pursuant to the Mobility Fund II Challenge Process Order. [Public Notice](#)

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