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November 12, 2018 HIGHLIGHTS

- The FCC released the [agenda](#) for its November 15, 2018 Open Meeting. It will consider eleven items, including a number of satellite items.
- The FCC [is circulating](#) items on Connect America Fund and CAF USF Reform – Mobility Fund.
- [Oppositions](#) were filed to Petitions for Reconsideration of the Network Testing [Order](#) that were filed by [Hughes](#), [Micronesian Telecommunications](#), [ViaSat](#), and jointly by [USTelecom ITTA](#) and [WISPA](#). Replies are due November 19, 2018. [FR](#)
- Clarity, Grand River Mutual Telephone, Hamilton County Telephone, and JSI [discussed](#) their pending petitions of the March 2018 RoR Order that seek additional A-CAM funding for 5,358 rural locations in their study areas that they claim were prevented from receiving any high cost support due to inadvertent clerical errors and a competitive provider overstating broadband deployment.
- Comments [are due](#) November 27, 2018, on Interstate Telecommunications Cooperative's [Petition](#) for a waiver of certain Part 51 rules to allow it to recalculate the rate bands and charges for local switching, tandem switching, and dedicated transport services for two study areas it seeks to merge on January 1, 2019. Replies are due December 12, 2018.
- O1 and Teliax [discussed](#) CenturyLink's Petition for Forbearance regarding access charges for Over-the-Top VoIP when the provider partners with a LEC to exchange traffic to and from the PSTN.
- The Eighth Circuit Court [granted](#) the FCC's [request](#) for a stay for one year, until November 12, 2019, of the Court's [decision](#) that vacated provisions in the 2017 [BDS Report and Order](#) affecting TDM transport services and remanded them to the FCC for further proceedings.
- The Wireline Competition Bureau [announced](#) the secure data enclave for highly confidential business data services data filed in the price cap BDS proceeding will reopen for purposes of commenting on the Second [FNPRM](#).
- Chairman Pai sent [letters](#) to AT&T, Verizon, and other voice providers urging them to adopt a robust call authentication system to combat illegal caller ID spoofing and launch that system no later than next year. The [Enforcement Bureau Chief](#) and Chief Technology Officer also sent [letters](#) to voice providers that are not participating in traceback efforts, calling on them to assist industry efforts to trace scam robocalls that originate on or pass through their networks.
- USAC filed [Federal Universal Service Support Mechanisms Fund Size Projections](#) for the first quarter of 2019, projecting the total high-cost support mechanism funding requirements to be \$1.147 billion.
- [Oppositions](#) were filed to [petitions for reconsideration](#) of the [Wireless Infrastructure Deployment Order and Declaratory Ruling](#). Replies are due November 19, 2018. [Public Notice](#)

Other Key Upcoming Dates

- Nov. 13 - Replies [are due](#) 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 they can serve.
- Nov. 19 - Replies [are due](#) to oppositions to Petitions for Reconsideration of the Network Testing [Order](#).

USF Reform

- The FCC placed two items [on circulation](#) with the Commission on November 6 and 8, 2018; one on the Connect America Fund and one on CAF USF Reform – Mobility Fund.
- Oppositions were filed on November 7, 2018, on Petitions for Reconsideration of the Network Testing Order filed by [Hughes](#), [Micronesian](#), [ViaSat](#), and jointly by [USTelecom](#) [ITTA](#) and [WISPA](#). [NTCA](#), [NRECA](#), and [Utilities Technologies Council](#) said the latency testing obligations of the Order must ensure the provision of quality voice service and do not suffer from administrative infirmity. They also argued the testing obligations must apply to recipients of support in the New York CAF Program. They indicated they differentiate between the goals of the tests, specifically, to affirm network performance, and the administration of the tests, *i.e.*, the manner in which each firm executes its obligations, and said various aspects of the Network Testing Order, including directives that pertain to over-provisioning, on-net testing, and flexibility in composing the sample pool and commencing hourly tests, can be refined to increase effectiveness and efficiency of the rules. [ITTA](#) supported Micronesian Telecommunications' request for a reduction in the number of subscribers required to be tested, as well as similar calls by NTCA and WTA in their Applications for Review for diminution of the required number of test subjects. ITTA also supported both WTA and NTCA's requested postponement of the scheduled commencement of performance testing until the Third Quarter of 2019, and supported WTA's challenge of the expanded test period. [AT&T](#) urged the Bureaus to grant USTelecom, ITTA, and WISPA's joint petition and make four adjustments to the testing and compliance framework: clarify that CAF recipients may test to the nearest internet access point, regardless of whether it is located in one of the sixteen cities identified by the Bureaus; harmonize the latency and speed testing requirements and compliance by adopting a once-per-hour testing requirement for both speed and latency, permitting CAF recipients to test the same subscribers for both speed and latency, and applying the same "80/80" compliance framework to both speed and latency testing; align the Bureaus' Level 1 performance compliance framework with the Commission's Tier 1 interim deployment milestone compliance framework; and reconsider the decision to exclude speed test results that demonstrate CAF recipients are providing subscribers with faster speeds than advertised. [ADTRAN](#) opposed Hughes' Petition, saying, if granted, it would vitiate the obligation in the Order to demonstrate that Hughes' broadband service is able to support quality voice services. ADTRAN, however, supported Viasat's Petition that challenged the requirement to retain third parties to conduct performance testing and to conduct "real-world" tests of latency using procedures specified in ITU-T Recommendation P.800. Replies are due November 19, 2018. [Hughes Network Systems](#) opposed Viasat's request to modify the framework for testing compliance with the Mean Opinion Score requirement for high-latency bidders in the CAF Phase II auction. It argued these standards were established prior to the auction, the Commission declined to make any changes to the standards in response to parties' requests prior to the auction, and prospective bidders made bidding decisions based upon them. It said changing the standards after the conclusion of the auction would upset bidders' settled expectations of the requirements for the auction and nullify the auction's results. [List of all oppositions available to date.](#) [FR](#)
- Clarity Telecom, dba Vast Broadband, Grand River Mutual Telephone, Hamilton County Telephone, and JSI [spoke with](#) Preston Wise, FCC Special Counsel, on November 6, 2018, to discuss their pending petitions of the March 23, 2018 RoR Order that seek additional A-CAM funding for 5,358 rural locations in their study areas that they claim were prevented from receiving any high cost support due to inadvertent clerical errors and a competitive provider overstating broadband deployment. They discussed the urgent need to grant their Petitions by including additional funding or, alternatively, including their Petitions in the context of the upcoming FCC decision evaluating the overall budget for the high-cost RoR USF mechanisms.

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ICC

- The Wireline Competition Bureau issued a [Public Notice](#) on November 7, 2018, seeking comments on Interstate Telecommunications Cooperative's [Petition](#) for a 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 study areas it seeks to merge on January 1, 2019. Interstate also seeks to recalculate the 2011 switched access revenue requirement and 2011 base period revenue for purposes of determining its CAF ICC support, but claimed this would result in zero impact on its CAF ICC support. Comments are due November 27, 2018; replies are due December 12, 2018.
- The Commission released [an Order](#) on November 9, 2018, designating the issues for investigation regarding the lawfulness of Iowa Network Access Division d/b/a Aureon's tariff revisions to its Tariff No. 1 filed on September 24, 2018. The issues designated are: whether the increase in Aureon's central office switching equipment investment in Transmittal No. 38 as compared to Aureon's February 2018 tariff filing (Transmittal No. 36) represents investment that is used and useful in Aureon's provision of regulated interstate service; and whether the annual network lease expense of \$4,299,427 complies with the Commission's affiliate transaction rules.
- O1 Communications and Teliax [met separately with](#) Chairman Pai's Advisor, [Commissioner Carr](#) and his Advisor, and Advisors for Commissioners [O'Rielly](#) and [Rosenworcel](#) on November 1 and 2, 2018, to discuss CenturyLink's Petition for Forbearance regarding access charges for Over-the-Top VoIP when the provider partners with a LEC to exchange traffic to and from the PSTN. They said they have invested in IP networks, claiming the availability of access charge revenues has enabled their completion, and asserted the inability of CLECs to earn the same would result in a strong movement back to monopoly. They claimed OTT VoIP providers and their CLEC partners perform the same functions as cable TV operators do for facilities-based VoIP services and as TDM voice providers do for traditional voice services. They urged the Commission to confirm its previous position that end office switched access charges apply to OTT VoIP calls when a LEC or its VoIP partner perform the end office functions.
- West Telecom Services and NTCA [spoke with](#) Chairman Pai's Advisor on November 12, 2018, to discuss its work on illegal spoofed robocalls and 8YY access charges. They said their comments were consistent with their prior filings.
- Western Iowa Networks, Goldfield Access Network, Great Lakes Communication, Northern Valley Communications, OmniTel Communications, and Louisa Communications filed [a letter](#) on November 5, 2018, in response to Inteliquent's October 19, 2018 [ex parte](#). The CLECs said: there is no evidence the long-distance charges paid by users of free conferencing services are insufficient to cover the costs incurred by the IXCs in delivering their customers' calls to the free conferencing providers; many of the CLECs no longer bill any mileage charges; and there is no evidence that any CLEC moved its points of interconnection following the FCC's Connect America Fund Order. They suggested the Commission either issue the data requests the CLECs have proposed and gather real evidence, or, if the IXCs are unwilling to back up their claims, the Commission should close this proceeding. They also responded to Inteliquent's assertions that traffic is being "intentionally rejected by the LEC and/or the calling platform connected to the LEC end office" as an access arbitrage scheme. They argued Inteliquent's proposal for rules that would encourage, rather than condemn, Inteliquent's actions should be rejected.

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Broadband

- Oppositions were filed on November 9, 2018, to [petitions for reconsideration](#) of the [Wireless Infrastructure Deployment Order and Declaratory Ruling](#). NTCA opposed the petitions filed by the Coalition of Concerned Utilities and the Smart Communities and Special Districts Coalition, saying these petitions seek to undo certain provisions adopted by the Commission that will enable NTCA

members to access certain utility poles at reasonable rates, terms, and conditions. [USTelecom](#) opposed the Coalition of Concerned Utilities' Petition, saying the Commission correctly established a presumption that, for newly-negotiated and newly-renewed pole attachment agreements between ILECs and IOUs, ILECs will receive comparable pole attachment rates, terms, and conditions as similarly situated telecommunications attachers. USTelecom also opposed the City of New York's Petition regarding claims that section 253(a) does not support the preemption of moratoria adopted in the Declaratory Ruling. USTelecom asserted the Commission has already considered and rejected these and related jurisdictional arguments in the Declaratory Ruling. The [Fiber Broadband Institute](#) opposed the Coalition of Concerned Utilities' Petition, claiming the arguments relied on by the Coalition were fully considered and rejected by the Commission in this proceeding. [Alliant Energy](#) filed in support of the Coalition of Concerned Utilities' Petition, asserting the Petition identifies issues in the Third Report and Order that could negatively impact electric ratepayers. Replies to oppositions are due November 19, 2018. [Public Notice](#)

- ITTA, Cincinnati Bell, Great Plains Communications, and TDS Telecom [spoke with](#) Wireline Competition Bureau staff on November 1, 2018, to discuss the [FNPRM](#) on Form 477 data reporting. They discussed concerns with the costs and accuracy of a broadband deployment data collection based on road segments and the merits of a data collection proposal involving an address-based database. They suggested such a proposal may be less burdensome but expressed concerns about the potential for public availability of competitively sensitive speed and service data.
- Gila River Telecommunications filed a [letter](#) on November 8, 2018, to submit a resolution from the National Congress of American Indians, which was adopted in recognition of the [GAO Report](#) that found the FCC's Form 477 data "do not accurately reflect or completely capture broadband access on tribal lands." GRTI said the NCAI resolution calls on the FCC to "ensure the data that the FCC collects through the FCC Form 477 process is comprehensively reformed in order to provide that it is sufficiently granular and accurate to provide a precise depiction of broadband access, availability, and affordability on Tribal lands nationwide." GRTI requested the Commission act consistently with the NCAI resolution as it seeks to modernize the Form 477 data collection.
- Comcast [spoke with](#) Wireline Competition Bureau staff on November 7, 2018, to discuss the proceeding on Form 477 data. Comcast discussed its ability to provide deployment data at various levels of granularity, focusing on the benefits and challenges associated with submitting deployment data at the road/street segment level.
- NASUCA filed a [letter](#) on November 8, 2018, urging the FCC to deny USTelecom's [Petition](#) for Forbearance from certain regulatory obligations imposed on ILECs. NASUCA claimed AT&T's plans to begin discussions with wholesale customers on a proposed commercial product to replace DS0 unbundled loops in the event the Commission grants USTelecom's petition highlights the need to deny USTelecom's petition. NASUCA asserted eliminating UNEs would leave one of the most market-power-heavy network owners to use its commercial weight against competitors, and small competitors would be at even more of a disadvantage in negotiations.
- Granite Telecommunications, Manhattan Telecommunications d/b/a Metropolitan Telecommunications, and Access One filed a [letter](#) on November 8, 2018, urging the FCC to deny USTelecom's [Petition](#) for Forbearance from certain regulatory obligations imposed on ILECs. Granite, et al. claimed USTelecom has not met its burden of proof to demonstrate that the public and competition will be advantaged by forbearance from the resale requirement in section 251(c)(4). They claimed USTelecom failed to address the fact that TDM-based telephone service provided via copper loops remains subject to continuing and durable demand by both business and government enterprise customers, especially those with multiple locations, who rely on its unique characteristics.
- Congressman Jared Huffman (D-Calif.) sent [a letter](#) to Chairman Pai on October 23, 2018, to draw his attention to the concerns raised in letters from his constituents about USTelecom's [Petition for Forbearance](#) from certain regulatory obligations applicable to ILECs. He said the letters highlight the importance of a competitive telecommunications marketplace in reducing the digital divide and

ensuring all Americans can access the internet, and he asked that their comments be carefully considered as the Petition is reviewed.

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Universal Service

- USAC filed [Federal Universal Service Support Mechanisms Fund Size Projections](#) for the first quarter of 2019 on November 2, 2018. USAC stated the total high-cost support mechanism funding requirements are projected to be \$1.147 billion. ([Appendices](#) are available on USACs website.)
- The Wireline Competition Bureau issued a [Public Notice](#) on November 9, 2018, seeking comment on Q Link Wireless' [Petition](#) for a limited waiver to use an alternative means to obtain National Verifier confirmation of a Lifeline applicant's eligibility in states in which a "hard launch" of the National Verifier occurs prior to resolution of Q Link's [Petition](#). Q Link's Petition requested implementation of APIs that permit ETCs to exchange information with USAC on a machine-to-machine basis during the enrollment process. Comments are due November 23, 2018; replies are due November 30, 2018.
- Q Link Wireless [met separately](#) with Chairman Pai and his Legal Advisor and Commissioners Carr and Rosenworcel and their Advisors on November 6, 2018, to explain the need for the Commission to direct USAC to implement the carrier APIs necessary for successful carrier-assisted online enrollment. Q Link requested the Commission act expeditiously on its [Petition](#) and, as an interim measure, grant Q Link's [request](#) for a waiver to permit it to provide information to the National Verifier via bulk electronic transfer. Q Link [also met with](#) Wireline Competition Bureau staff to discuss the same issues.
- Broadband VI filed a [letter](#) on November 9, 2018, to follow up on its [recent meeting](#) with the Wireline Competition Bureau on Stage 2 funding for Puerto Rico and the USVI. It reiterated its position that eligibility for Stage 2 support should be limited to those broadband providers that were serving customers as of June 30, 2017, asserting the USVI Fund is not intended to support start-up businesses in the USVI that were unharmed by Hurricanes Irma and Maria. It also reiterated its support for the Commission's suggestion that the Commission should reassess the deployment obligations before the end of the fifth year of support.
- Puerto Rico Telephone Company filed [a letter](#) on November 2, 2018, with a supplement to its October 12, 2018 letter that provided data about the appropriate budget for fixed providers in the Uniendo a Puerto Rico Fund. It said the first letter included the projected reserve price and support amounts under the Uniendo Fund using the Commission's CAM Model, and indicated the support amounts in the Exhibit were presented as rolled-up to the municipio level. PRTC said this supplement revises the Exhibit to include the support calculated at the census block level as well. It said the purpose of providing the revised Exhibit is to demonstrate the feasibility of rolling up to the municipio level support that is calculated at the census block level. ([excel attachment, part 2](#))
- Truphone filed an [Emergency Request for Waiver](#) on November 5, 2018, of the February 2018 Form 499-Q 45-day revision deadline. Truphone said it seeks a waiver to correct a substantial error in its February 2018 Form 499-Q, and asked the FCC to require USAC to refund any excess USF contribution payments made by Truphone and waive any late payment fees, interests, or penalties that USAC has or may assess resulting from the error.

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Misc.

- The FCC released the [agenda](#) for its November 15, 2018 Open Meeting on November 9, 2018. The Commission will consider: an [Order](#) addressing waivers of certain satellite licensing requirements for receive-only earth stations operating with the Galileo Radio Navigation-Satellite Service; an [NPRM](#) to update the orbital debris rules for all Commission-authorized satellites; an [NPRM](#) addressing rules to facilitate the deployment of non-geostationary orbit fixed-satellite service earth stations that transmit

while in motion; a [Memorandum Opinion, Order, and Authorization](#) that would grant SpaceX's request to deploy and operate a proposed non-geostationary constellation to provide broadband services around the world; an [Order and Declaratory Ruling](#) that would grant Kepler's request for U.S. market access to offer global connectivity for the Internet of Things using a proposed constellation of non-geostationary orbit satellites; an [Order and Declaratory Ruling](#) that would grant Telesat's request to access the U.S. market to provide broadband services; an [Order and Declaratory Ruling](#) that would grant LeoSat's request for U.S. market access to provide satellite broadband services; an [NPRM](#) to streamline space and earth station licensing rules; an [NPRM](#) to align the DBS licensing procedures with those of the geostationary fixed-satellite service; a [Report and Order](#) that would modernize certain consumer notice provisions in Part 76 governing multichannel video and cable television service; and a [Report and Order](#) that would replace requirements for wireless service providers to report annually on their offerings of hearing aid-compatible handsets with a requirement to provide enhanced information on their websites and to certify annually whether they are in full compliance with the hearing aid compatibility rules.

- The Eighth Circuit Court issued an [Order](#) on November 9, 2018, granting the FCC's [request](#) for a stay for one year, until November 12, 2019, of the Court's [decision](#) that vacated provisions in the 2017 [BDS Report and Order](#) affecting TDM transport services and remanded them to the FCC for further proceedings. The FCC asserted in its request that a stay will avoid extensive and unnecessary disruption in the BDS market while it addresses on remand the notice issue.
- The Wireline Competition Bureau issued a [Public Notice](#) on November 5, 2018, to announce the secure data enclave for highly confidential business data services data hosted by NORC at the University of Chicago and used by authorized parties for accessing and analyzing highly confidential data filed in the price cap BDS proceeding will reopen for purposes of commenting on the Second [FNPRM](#). The NORC Data Enclave will reopen after the summary of the FNPRM is published in the Federal Register and will close 14 days after reply comments are due, unless at least one interested party provides a timely and compelling argument demonstrating that continued access to the data is necessary to their meaningful participation in the proceeding.
- Chairman Pai sent [letters](#) to AT&T, Verizon, Comcast, Charter, and other voice providers on November 5, 2018, urging them to adopt a robust call authentication system to combat illegal caller ID spoofing and launch that system no later than next year. Pai asked those companies that have not yet established concrete plans to protect their customers using the SHAKEN and STIR standards to do so without delay. Pai posed questions to the providers regarding their implementation plans.
- The FCC issued a [News Release](#) on November 6, 2018, reporting that the Enforcement Bureau Chief Rosemary Harold and Chief Technology Officer Eric Burger sent [letters](#) to voice providers that are not participating in traceback efforts, calling on them to assist industry efforts to trace scam robocalls that originate on or pass through their networks. Harold and Burger said "A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination . . . Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country."
- ZipDx [met with](#) FCC staff on November 1 and 2, 2018, to suggest tracing calls back to the source and stopping them there has proven effective in recent enforcement cases. It claimed many providers are participating in traceback, implementing know-your customer procedures, and taking other steps to ensure their platforms are not conduits for illegal robocalls. ZipDx asked the Commission to issue an Enforcement Advisory, similar to that for Rural Call Completion in 2013, calling on all providers to participate as warranted in industry efforts to stop illegal calls at the source.
- No comments filed on Consolidated Long Distance's application seeking authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)

- To date, no replies were filed on applications filed by Townes Telecommunications, Tatum Telephone, Electra Telephone, and Hilliary Acquisition Corp requesting Commission approval for the transfer of control of TTI's direct subsidiaries, Tatum and Electra, to Hilliary. [Public Notice](#)
- Altice USA filed a [Petition for Waiver](#) on November 9, 2018, of section 52.15(g)(2) to allow Altice USA to receive wireless telephone numbers directly from the numbering administrators based on its infrastructure-based MVNO.

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Upcoming Filing Dates

- Nov. 13 - Reply comments due 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. [Public Notice FR](#)
- Nov. 13 - Comments due on Mid-Hudson Data's [Petition](#) seeking ETC designation in the State of New York in all areas in which it has been awarded CAF Phase II support via the New NY Broadband Program. Reply comments are due November 20, 2018. [Public Notice](#)
- Nov. 14 - PRA comments due on revisions to currently approved information collections associated with sections 214, 222(e) and 251. [FR](#)
- Nov. 16 - Comments due on the [Public Notice](#) requesting comments on whether certain docketed proceedings listed in the attachment to the Public Notice should be terminated as dormant. Replies due December 3, 2018. [FR](#)
- Nov. 16 - Comments due on the applicability of the [John S. McCain National Defense Authorization Act for Fiscal Year 2019](#) to the FCC's Protecting Against National Security Threats to the Communications Supply Chain rulemaking and to the programs the Commission oversees. Replies are due December 7, 2018. [Public Notice](#)
- Nov. 19 - PRA comments due on a new information collection to establish an intermediate provider registry. [Notice](#)
- Nov. 19 - Replies due to oppositions to [petitions for reconsideration](#) of the [Wireless Infrastructure Deployment Order and Declaratory Ruling](#). [Public Notice](#)
- Nov. 19 - Replies due to Petitions for Reconsideration of the Network Testing [Order](#). [FR](#)
- Nov. 20 - Replies due on Mid-Hudson Data's [Petition](#) seeking ETC designation in the State of New York in all areas in which it has been awarded CAF Phase II support via the New NY Broadband Program. [Public Notice](#)
- Nov. 23 - Comments due on Q Link Wireless' [Petition](#) for a limited waiver to use an alternative means to obtain National Verifier confirmation of a Lifeline applicant's eligibility in states in which a "hard launch" of the National Verifier occurs prior to resolution of Q Link's [Petition](#). Replies are due November 30, 2018. [Public Notice](#)
- Nov. 27 - Comments due on Interstate Telecommunications Cooperative's [Petition](#) for a 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 study areas it seeks to merge on January 1, 2019. Replies are due December 12, 2018. [Public Notice](#)

- Nov. 28 - Comments due on expanding the list of key applications and functionalities for which a carrier must demonstrate interoperability when requesting to discontinue a legacy voice service pursuant to the adequate replacement test. Reply comments are due December 13, 2018. [Public Notice](#)
- Nov. 30 - Replies due on Q Link Wireless' [Petition](#) for a limited waiver to use an alternative means to obtain National Verifier confirmation of a Lifeline applicant's eligibility in states in which a "hard launch" of the National Verifier occurs prior to resolution of Q Link's [Petition](#). [Public Notice](#)
- Dec. 3 - PRA comments due on an extension of a currently approved information collection associated with FCC Forms 492 and 492-A, Rate-of-Return Monitoring Reports. [Notice](#)
- Dec. 3 - Replies due on the [Public Notice](#) requesting comments on whether certain docketed proceedings listed in the attachment to the Public Notice should be terminated as dormant. [FR](#)
- Dec. 5 - Oppositions due to Aureon's direct case in connection with its Tariff No. 1 revisions filed on September 24, 2018. [Order](#)
- Dec. 7 - Replies due on the applicability of the [John S. McCain National Defense Authorization Act for Fiscal Year 2019](#) to the FCC's Protecting Against National Security Threats to the Communications Supply Chain rulemaking and to the programs the Commission oversees. [Public Notice](#)
- Dec. 10 - PRA comments due on an extension of a currently approved information collection associated with Part 64 pay-per-call rules. [Notice](#)
- Dec. 12 - Replies due on Interstate Telecommunications Cooperative's [Petition](#) for a 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 study areas it seeks to merge on January 1, 2019. [Public Notice](#)
- Dec. 13 - Replies due on expanding the list of key applications and functionalities for which a carrier must demonstrate interoperability when requesting to discontinue a legacy voice service pursuant to the adequate replacement test. [Public Notice](#)
- Dec. 24 - PRA comments due on an extension of a currently approved information collection regarding section 51.803, Procedures for Commission Notification of a State Commission's Failure to Act and Supplemental Procedures for Petitions Pursuant to section 252(e)(5). [FR](#)

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