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### November 13, 2017 HIGHLIGHTS

- The FCC released the [agenda](#) for its November 16, 2017 Open Meeting. The FCC will consider, among other things: a [Report and Order](#) that would authorize voice service providers to block certain types of robocalls that falsely appear to be from telephone numbers that do not or cannot make outgoing calls; a [Report and Order](#) to eliminate the requirement for historic preservation review where utility poles are replaced with substantially identical poles that can support antennas or other wireless communications equipment; a [Report and Order, Declaratory Ruling, and FNPRM and Order](#) on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) service discontinuance processes; and a [Fourth Report and Order, Order on Recon., MO&O, NPRM, and NOI](#) to adopt and propose measures to bridge the digital divide for Lifeline subscribers and reduce waste, fraud, and abuse in the Lifeline program.
- Commissioner Carr was [appointed](#) to serve on the Federal-State Joint Board on Universal Service and the Federal-State Joint Board on Jurisdictional Separations, replacing Chairman Pai on these Boards. Carr and Commissioner Rosenworcel will serve on the Federal-State Joint Conference on Advanced Services.
- The FCC [announced](#) the 2018 local voice service rate floor is \$25.50, the reasonable comparability benchmark for voice services is \$45.38, and reasonable comparability benchmarks for broadband service offerings range from \$85.54 for 4/1 Mbps to \$217.43 for 1000/100 Mbps.
- NTCA [discussed](#) the need to address outstanding issues on high-cost USF reform. Thirty-seven Iowa RLECs [asked](#) the FCC to allocate additional A-CAM funding up to \$200/month per eligible customer location. Great Plains, TDS, et al. [discussed](#) the benefits and efficiencies that would be realized from funding the A-CAM Plan at \$200/month per location this year. Copper Valley Telephone and GVNW [support](#) maintaining at least the overall budget level of \$4.5 billion for the high-cost USF into 2018 pending further study.
- [Comments were filed](#) on the parameters and procedures to implement the MF-II challenge process. Replies due November 29, 2017. [Public Notice \(attachment\)](#)
- The FCC [granted](#) USTelecom's [Motion](#) for an extension of time to file replies on the [Public Notice](#) on updating the record on ICC reform issues. Replies are now due November 20, 2017.
- The FCC [granted](#) in part AT&T's Complaint against Iowa Network Services for charging AT&T for centralized equal access service on traffic destined for CLECs engaged in access stimulation.
- Verizon [discussed](#) 8YY arbitrage, arguing FCC action to transition originating access rates and the remaining transport rates to bill-and-keep is overdue. GCI [said](#) 8YY traffic should return to its earlier treatment as terminating for purposes of intercarrier compensation, with a reasonable transition period and glide path. AT&T [discussed](#) 8YY call flows, database query charges, arbitrage, and its Petition for Forbearance from such access charges.

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#### Other Key Upcoming Dates

- Nov. 20 - Replies due on updating the record on ICC reform issues. [Public Notice](#), [Notice](#)
- Nov. 29 - Replies due on the specific parameters and procedures to implement the MF-II challenge process. [Public Notice \(attachment\)](#)

## USF Reform

- The Wireline Competition Bureau released a [Public Notice](#) on November 8, 2017, announcing the 2018 voice service rate floor, the reasonable comparability benchmarks for fixed voice and broadband services, and the required minimum usage allowance for ETCs subject to public interest obligations. The 2018 urban average monthly local voice service rate (the rate floor) is \$25.50, and the reasonable comparability benchmark for voice services is \$45.38. The 2018 reasonable comparability benchmarks for broadband service offerings range from \$85.54 for 4/1 Mbps with a capacity allowance of 170 GB to \$217.43 for 1000/100 Mbps with an unlimited allowance. The benchmarks for Alaska Plan carriers are higher. ETCs providing fixed voice and broadband services must certify they meet the benchmarks in the FCC Form 481 filed no later than July 1, 2017. The Bureau noted in May 2017, the Commission froze the local voice rate floor at which support reductions would occur at \$18 until July 1, 2018, or until the Commission takes further action. Carriers will not be subject to any support reductions for any rate that is at least \$18, but carriers must still report their rates to the extent those rates are below the 2018 rate floor (i.e. \$25.50) in their annual Form 481 filings. It also announced the posting of the fixed voice and broadband services data collected in the most recent urban rate survey, and explanatory notes regarding the data, on the Commission's [website](#).
- NTCA [met with](#) Legal Advisors to Commissioners O'Rielly and Clyburn on November 3, 2017, to discuss the need to address outstanding issues teed up for reconsideration or further action in connection with high-cost USF reforms, including a path toward helping to mitigate the insufficiency of USF support and greater prospective confirmation on the eligibility of certain expenses for cost recovery. NTCA also observed that, even as longer-term measures with respect to USF budgets are considered, the Commission can and should take action now with respect to near-term USF sufficiency in response to the fully-briefed record arising out of its Petition for Reconsideration.
- Thirty-seven Iowa RLECs filed [a letter](#) on November 8, 2017, requesting the Commission allocate additional A-CAM funding up to \$200/month per eligible customer location for all companies nationwide that voluntarily elected USF funding under the A-CAM model. They claimed the Commission already supported as Commission public policy A-CAM funding at \$200/month per location in the original RoR Reform Order, and thus such an increase in funding will require no additional policy determinations by the Commission. They also asserted A-CAM companies will be required to accept the additional buildout obligations under the conditions of the Order issued in December 2016 should the Commission act by the end of 2017.
- Great Plains Communications, TDS Telecom, Ritter Communications, Blackfoot, and ITTA [met separately with](#) Commissioners Clyburn, Carr, and Rosenworcel and their Advisors on November 6, 2017, to discuss the benefits and efficiencies that would be realized from funding the A-CAM Plan at \$200/month per location this year, including the application of additional, specific build-out obligations.
- Copper Valley Telephone and GVNW [met with](#) Legal Advisors to Commissioners O'Rielly, Carr, Rosenworcel, and Clyburn on November 2, 2017, to express support for maintaining at least the overall budget level of \$4.5 billion for the high-cost USF into 2018 pending further study, and expressed concern regarding the cumulative year-over-year effect of the loss of a net interest annual accrual of \$53.5 million on FUSF deposited in the bank. They also discussed the metric for broadband target speeds in the US, including for carriers facing the unique challenges in Alaska.
- Comments were filed November 8, 2017, on the parameters and procedures to implement the MF-II challenge process. [NTCA](#) said some of the proposals would prove unnecessarily burdensome for the small providers who must participate in this process to obtain accurate identification of areas eligible for support. It requested the Commission require that handsets identified for use in speed testing not be subject to any network management practices that may affect accuracy, and that the Commission be mindful of the seasonal limitations associated with an attempt to gather data in many parts of rural America as it finalizes its timeline. [The Rural Wireless Association](#) urged the Commission to: provide prospective challengers at least 30 days' notice ahead of the USAC challenge portal opening; create an exception to the use of one square kilometer grid for rural areas; require service providers to identify a variety of handset models appropriate for testing coverage; and clarify that a "qualified engineer" may

work directly for an operator or a third party on behalf of an eligible challenger. It opposed the proposal to require challengers to provide several other data parameters associated with a speed test and opposed the TMS triangulation method to rebut a challenge. [Verizon](#) said the Commission should: require challengers to report information about the server used for speed testing; clarify that respondents may submit technical data without using the proposed templates; and require challengers to conduct all speed tests using devices that are not subject to reduced speed under the terms of the challenger's service plan. [All comments available to date](#). Replies due November 29, 2017. [Public Notice \(attachment\)](#)

- Reid Consulting Group [met separately with](#) Advisors to Chairman Pai and Commissioners Rosenworcel, Carr, and O'Rielly and Wireline Competition Bureau staff on November 3, 2017, to discuss its concerns regarding residential broadband in rural areas and issues regarding the CAF in the effort to resolve availability gaps. It discussed carrier performance, reverse auction sub-optimizations, and proposed solutions. It said incumbents relying on dilapidated copper plant is particularly troublesome, and claimed reverse auctions guarantee minimum functionality, i.e., a race to the bottom.
- U.S. Cellular [met with](#) FCC staff on November 6, 2017, to discuss the use of package bidding in the upcoming CAF Phase II auction and the complexities it presents for small bidders. U.S. Cellular asked the Commission to limit burdens on small carriers at the short form stage, including the filing of specific frequencies to be used and propagation maps. It also asked the Commission to limit bidders' ability to switch tiers between rounds, claiming this increases complexity and opacity, disadvantaging small applicants with fewer resources.
- Seven Michigan State Senators sent [a letter](#) to Chairman Pai and Commissioners Clyburn, O'Rielly, Carr, and Rosenworcel on October 17, 2017, to urge the FCC to ensure that providers willing to serve an area with 1 Gbps and 100 Mbps have a real chance to do so. They urged the Commission to adopt sufficient up-front reviews and safeguards for the CAF Phase II auction to ensure that only those capable of truly delivering this service in sparsely populated areas are able to participate in the auction.

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## ICC

- The Wireline Competition Bureau issued [an Order](#) on November 9, 2017, granting in part USTelecom's [Motion](#) for an extension of time to file reply comments on the Public Notice to update the record on ICC 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. Reply comments are now due November 20, 2017.
- The FCC issued an [Order](#) on November 8, 2017, granting in part AT&T's Complaint against Iowa Network Services, d/b/a Aureon Network Services, for charging AT&T for centralized equal access service on traffic destined for CLECs engaged in access stimulation. The Commission concluded that Aureon is subject to the Commission's rate cap and rate parity rules, and it violated those rules by filing tariffs containing rates exceeding those prescribed by the Commission. The FCC said it will determine in the damages phase of this proceeding what Aureon's rates should have been and whether refunds to AT&T are warranted. It ordered Aureon to revise its tariff to file rates that comply with the Commission's rules. The FCC otherwise disagreed with AT&T's assertions that Aureon acted unlawfully.
- The FCC issued a [Public Notice](#) on November 9, 2017, seeking comments on Verizon's [Petition for Waiver](#) of rule 61.74(a) when one of Verizon's FCC tariffs references another. Verizon claimed the current rule requires it to obtain special permission in advance for filings related to tariffed discount plans, contract tariffs, and other offerings that span more than one tariff. It explained it offers customers the same or very similar access services under each of its four tariffs, including special access services at DS3 speeds and below, and claimed many of its customers purchase these services under tariffed

discount plans, and although it appears in four tariffs, it is a single, national plan, substantively identical in each of the tariffs. Comments are due December 11, 2017; replies are due January 10, 2018.

- Verizon [met with](#) Wireline Competition Bureau staff on November 2, 2017, to discuss 8YY arbitrage. It argued Commission action to transition originating access rates and the remaining transport rates to bill-and-keep is long overdue, and asserted the delay has allowed both 8YY- and transport-based arbitrage schemes to proliferate. It said, at a minimum, it is time for the Commission to end access stimulation by reducing transport rates to bill-and-keep for those carriers engaged in access stimulation.
- GCI [met with](#) Wireline Competition Bureau staff on November 2, 2017, to restate its position that 8YY traffic should return to its earlier treatment as terminating for purposes of intercarrier compensation, with a reasonable transition period and glide path. GCI also reviewed the unique network architecture in Alaska, in which IXCs carry calls that go beyond the local calling area, often even when the calling and called parties are served by the same LEC.
- AT&T [spoke with](#) Wireline Competition Bureau staff on November 7, 2017, to discuss 8YY call flows, database query charges, and arbitrage. AT&T expressed continued support for its Petition for Forbearance from such access charges as well as broader ICC reform.
- To date, no replies were filed 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](#)

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## Broadband

- Chairman Pai sent a [letter](#) to L. Elizabeth Bowles, Chair of the Broadband Deployment Advisory Committee, on November 8, 2017, in response to her [letter](#) reporting on the progress made by the BDAC. Pai said he asked FCC staff to schedule the next BDAC meeting for January 23-24, 2018, as recommended by Ms. Bowles, and said this schedule gives the BDAC additional time to reach the right solutions on its model codes and in other key areas, as well as an extra day of deliberations to finalize its recommendations and report.
- Commissioners O'Rielly and Clyburn spoke at the Broadband Deployment Advisory Committee meeting on November 9, 2017. [O'Rielly](#) said the barriers preventing providers from bringing fixed and wireless broadband throughout the nation have increased despite the existence of the BDAC, claiming barriers being imposed are not caused by a failure to collaborate, but a failure to heed current law and a resistance to allowing citizens access to modern communications unless certain localities impose their will or extract bounties from providers. He also said the debate over the BDAC's makeup is an unnecessary distraction, suggesting the Chairman should be given some deference on his selection choices. [Clyburn](#) said not every broadband problem is an infrastructure problem, and said for the millions who depend on Lifeline, particularly those in our dense urban centers, infrastructure is not the problem, affordability is.
- USDA's Assistant to the Secretary for Rural Development Anne Hazlett [announced](#) on November 6, 2017, the USDA is awarding [more than \\$200 million](#) in Community Connect grants to bring broadband to hundreds of unserved and underserved rural communities. The USDA is awarding nine grants in West Virginia, Minnesota, Oklahoma, Tennessee, Virginia, and Washington, as well as 10 loans in rural parts of Illinois, Iowa, Kansas, South Dakota, Tennessee, Utah, Virginia, and Wisconsin.
- Rep. Anna G. Eshoo (D-Calif.), along with 13 other Member of Congress, sent a [letter](#) to Chairman Pai on November 7, 2017, urging him to expand representation of state and local government officials on the Broadband Deployment Advisory Committee. They asserted as the BDAC currently stands, more

than three out of four seats are filled by representatives from the biggest wireless and cable companies, and claimed of the numerous local government representatives that applied to join the BDAC, only one was originally selected to serve on the 30-member committee.

- The National Association of Counties, National League of Cities, et al. sent a [letter](#) to Chairman Pai on November 3, 2017, to urge the FCC to more fully consider local perspectives in the NPRMs on wireline and wireless broadband infrastructure, and requested the FCC provide for an appropriate level of local government representation on the BDAC. They asked the FCC to share drafts of all BDAC working documents on the FCC's homepage, and provide sufficient time for the BDAC to develop informed opinions that can be shared in interim final reports that are made subject to public review, among other things.
- NRECA [met with](#) Commissioner Rosenworcel's Legal Advisor on November 3, 2017, to discuss the wireline infrastructure deployment [NPRM and NOI](#) and impediments to broadband deployment in rural communities, especially those served by rural electric cooperatives. NRECA claimed deploying broadband to rural communities served by electric cooperatives is simply more expensive due to the lower population density, and not caused by unregulated pole attachment rates. NRECA also discussed interest by some electric coops to participate in the upcoming CAF II auctions, and said the auction complexity makes it harder for small entities to participate and compete.
- Comcast and Charter Communications [met with](#) Legal Advisors to Commissioners Carr and O'Rielly and Wireline Competition Bureau and Office of Strategic Planning staff on November 1, 2017, to discuss the draft [Report and Order, Declaratory Ruling, and FNPRM](#) on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes, that will be considered at the November 16, 2017 Open Meeting. They urged the FCC to reaffirm precedent holding overlashers need not "obtain additional approval from or consent of the utility for overlashing other than the approval obtained for the host attachment," and "are not required to give prior notice to utilities before overlashing." They also [met with](#) Legal Advisors to Chairman Pai and Commissioners Clyburn and Rosenworcel on November 6, 2017, to discuss the same issues.
- NCTA [met with](#) Legal Advisors to Chairman Pai and Commissioners Clyburn, Carr, O'Rielly, and Rosenworcel on November 6, 7, and 8, 2018, to discuss pole attachment issues in the wireline infrastructure deployment [NPRM and NOI](#) and the draft [Report and Order and FNPRM](#) on further changes to the pole attachment rules. NCTA encouraged the FCC to make a finding that the current overlashing policy has been successful in promoting safe and efficient network deployment and reaffirm that pole owners may not require prior approval for overlashing to facilities that already have been approved. NCTA also claimed some proposals for one-touch make-ready do not strike the necessary balance, and asked the FCC to promote transparency around pole attachment rates, terms and conditions by granting its Petition for Reconsideration of the Part 32 Order.
- AES Corporation, Arizona Public Service Company, ComEd, Consumers Energy, et al. [met with](#) Chairman Pai and his Legal Advisor and Commissioner Clyburn's Legal Advisor on November 1, 2017, to discuss the wireline infrastructure deployment [NPRM and NOI](#). They discussed their proposal to improve the process by which communications companies may attach their facilities to electric distribution poles, and reiterated support for one-touch make-ready.
- The American Cable Association [met with](#) Chairman Pai's Senior Counsel and Legal Advisors on November 3, 2017, to discuss the draft [Report and Order and FNPRM](#) on further changes to the pole attachment rules. ACA supported the proposed Order's pole attachment reforms to exclude from pole attachment rates capital costs recovered via make-ready fees and to establish a 180-day shot clock for resolution of pole access complaints. ACA also supported the proposed rulemaking to address requests by attachers to overlash existing wires or install drops from poles to customers without filing pole attachment applications.
- Verizon [met with](#) Legal Advisors to Chairman Pai and Commissioner Clyburn on November 3, 2017, to discuss issues raised in the [draft Report and Order](#) on replacement poles. It suggested minor changes or clarifications to better account for the way in which these facilities are deployed would make these reforms significantly more meaningful without compromising historic properties. Verizon asked the

Commission to amend or clarify the draft Order to allow the replacement pole to be located up to 10 feet from the replaced pole to allow construction of the replacement pole prior to removing the existing pole. Verizon also [met with](#) Legal Advisors to Commissioners O’Rielly and Rosenworcel on November 6, 2017, and [with](#) Wireless Telecommunications Bureau staff on November 2, 2017, to discuss the same issues.

- CTIA and the Wireless Infrastructure Association [met with](#) Wireless Telecommunications Bureau staff on November 2, 2017, to urge the Commission to update the section 106 Tribal consultation process and procedures to protect sites of historic, religious, and cultural significance to Tribes while enabling the efficient delivery of advanced communications services and technologies nationwide. They also said the [draft Report and Order](#) proposing to streamline the process of deploying wireless broadband should ensure meaningful relief from unnecessary regulatory requirements for replacement facilities that have no potential to affect historic properties.
- CTIA filed a [letter](#) on November 9, 2017 on the [draft Report and Order](#) on replacement poles. CTIA said the Commission should revise the rule to delete the same hole requirement, and instead state that the exclusion applies where the replacement pole is located in the immediate vicinity of the original pole and the original pole is removed once the replacement is complete. CTIA also said the FCC should revise the height limitation rule to state that the replacement pole does not exceed the height of the original pole by more than one foot or 10 percent of the height of the original pole, whichever is greater.
- Sprint [met with](#) Commissioner Clyburn’s Legal Advisor on November 2, 2017, to discuss the need to reform the historic review process, claiming the costs for section 106 review constitute a substantial barrier to the deployment of small cells. Sprint also discussed the draft Order on replacement poles, and asserted the [draft Report and Order](#) defines replacement poles in an ambiguous manner and does not explicitly address whether traffic signals and street lights are exempt from review. Sprint also [met with](#) Legal Advisors to Chairman Pai and Commissioners Clyburn, Rosenworcel, and O’Rielly on November 6 and 7, 2017, to discuss the same issues.
- Sprint [amended](#) its ex parte [notice](#) filed on October 26, 2017, after meeting with Wireless Telecommunications Bureau and General Counsel staff to discuss regulatory barriers to the deployment of small cell infrastructure, including the costs imposed by the current tribal review process. Sprint urged the Commission to adopt reasonable interpretations of potentially ambiguous terms rather than impose the highest possible costs and burdens on wireless deployment, particularly in situations such as street light replacement where the potential impact on eligible historic properties is minimal.
- The WEC Energy Group filed a [letter](#) on November 8, 2017, on the [draft Report and Order](#) on replacement poles. WEC said it is concerned the proposed language could instead complicate the pole replacement process and would have a significant effect on utility pole owners, and recommended changes to the proposed exclusion for utility pole replacements that support antennas.
- The Thlopthlocco Tribal Town Historic Preservation Office filed a [letter](#) on November 8, 2017, on the [draft Report and Order](#) on replacement poles. The THPO expressed concern that the Commission has not conducted tribal consultation regarding this issue, and disagreed with the claim that no historic preservation review is necessary for pole replacement.
- The Broadband Access Coalition [met with](#) Commissioners Carr and Rosenworcel and Commissioner Clyburn’s Legal Advisor on November 8, 2017, to discuss its proposal to amend and modernize the FCC’s rules to enable deployment of high-throughput licensed point-to-multipoint fixed wireless broadband services in the 3700 – 4200 MHz band.
- The Senate Subcommittee on Communications, Technology, Innovation, and the Internet held a [hearing](#) on November 7, 2017, entitled “Advancing the Internet of Things in Rural America.” The hearing examined the uses and benefits of the Internet of Things in rural communities and the infrastructure needs necessary to advance the IoT market to ensure rural America has access to

products and devices that are driving the digital economy. Testimonies were given by: [Michael Adcock](#), Telehealth Center University of Mississippi Medical Center; [David Armitage](#), Cartasite; [Timothy Hassinger](#), Lindsay Corporation; [Angela Siefer](#), National Digital Inclusion Alliance; and [Michael Terzich](#), Zebra Technologies.

- CTIA filed a [letter](#) on November 8, 2017, detailing the results of a Harris Poll survey it commissioned of over 500 business leaders across the healthcare, transportation, energy, and manufacturing industries. CTIA said the survey finds, among other things: wireless is critical to U.S. businesses and businesses increasingly rely on wireless; the U.S. must be a leader in 5G and 5G will help grow U.S. businesses; and businesses across industries are investing in wireless. CTIA asserted the combination of sound Commission policies and industry innovation, investment, and deployment will ensure American victory in the race for 5G.

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## Open Internet

- The FCC issued a [Public Notice](#) on November 7, 2017, to announce that to facilitate a review of the record, all filings in the Restoring Internet Freedom record, as of November 3, 2017, are available via download. The filings are provided in JSON files, in batches of 10,000, compressed into three archive files.
- AT&T [met with](#) Chairman Pai's Legal Advisor on November 2, 2017, to urge the FCC to undo the classification of broadband internet access services as telecommunications services under Title II. AT&T asserted the FCC has clear authority to treat BIAS as an information service, and under the APA need only explain its reasons for undoing its 2015 reclassification. AT&T also discussed the FCC's authority to preempt state-by-state regulation of broadband internet services, claiming that authority is supported by a long line of precedent, including the Vonage Order and the Eighth Circuit's subsequent affirmation of that Order.
- Verizon [met with](#) Wireless Telecommunications, Wireline Competition Bureau, and General Counsel staff on November 6, 2017, to assert Title II regulation of broadband services is harmful to investment and innovation. Verizon said the Commission should ensure that any regulatory framework that applies to BIAS recognizes that these services are inherently interstate, and it should prevent states and localities from undermining the Commission's national light-touch framework with a patchwork of contrary state or local regulations. Verizon also met with [Commissioner Carr](#) and his Legal Advisor to discuss the same issues, as well as the importance of the Commission's work to support development of 5G technologies.
- The Free State Foundation [met with](#) Chairman Pai's Legal Advisor on November 6, 2017, to discuss open internet issues. Free State claimed broadband internet access services are Title I information services and not Title II telecommunications services, and asserted the FCC does not possess authority to regulate broadband ISPs as common carriers. Free State also asserted the FCC lacks authority under section 706 to regulate broadband ISP's practices, and argued mobile broadband is a private, not common, carrier service. The Free State Foundation also [met with](#) Commissioner Carr on November 7, 2017, to discuss the same issues.
- TechFreedom [met separately](#) with Commissioner O'Rielly and his staff and Chairman Pai's Chief of Staff on November 9, 2017, to discuss the Open Internet proceeding as well as the ongoing litigation challenging the 2015 Open Internet Order. It discussed whether classifying broadband as a telecommunications service under Title II constitutes a major question requiring express congressional authorization. It also discussed what section 230(c) of the Communications Decency Act means for the Commission's ability to enforce the current no-blocking rule. TechFreedom also provided an op-ed entitled *Net Neutrality: Two Sleeper Legal Issues May Force Congress to Act* and a memorandum summarizing pending litigation before the Supreme Court for organizations potentially interested in filing amicus briefs in the case.

- The International Center for Law and Economics [met separately with](#) Chairman Pai and his Legal Advisor, Commissioners O’Rielly and Carr and their Legal Advisors, and Legal Advisors to Commissioners Rosenworcel and Clyburn on November 2, 2017, to discuss Open Internet issues. ICLE asserted Congress is the proper place for the enactment of fundamentally new telecommunications policy, and the Commission should base its regulatory decisions interpreting Congressional directives on carefully considered empirical research and economic modeling. ICLE also urged the FCC to ensure that the rules adopted in this proceeding appropriately preempt state regulation.
- Etsy and some of its sellers [met with](#) Commissioner Clyburn and her Chief of Staff on October 27, 2017, to express concern with efforts to repeal the 2015 Open Internet [Order](#). Etsy also asserted that given consumer reliance on mobile to access the internet, neutrality protections should be consistent across desktop and mobile devices, and urged the Commissioner to treat mobile and desktop as one in the same.

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## IP Transition

- The Pennsylvania PUC filed a [letter](#) on November 7, 2017, on the draft [Report and Order, Declaratory Ruling, and FNPRM](#) on copper retirement.. The PUC opposes aspects of the proposed revisions to the existing copper network retirement rules that would eliminate the requirements of direct notice to retail customers, state commissions, governors, Tribal Nations, and the Department of Defense. The PUC said the FCC’s existing rules have not impeded copper network replacement projects in Pennsylvania, and asserted the current Commission rules governing notice requirements to end-users help minimize customer confusion and the frequency of informal and/or formal complaints that are or may be associated with copper network replacement projects.
- AT&T [spoke with](#) Wireline Competition Bureau staff on November 7, 2017, to discuss the draft [Report and Order, Declaratory Ruling, and FNPRM](#). AT&T discussed section 214 service discontinuance and proposed rules 51.333(b)(2) and 51.333(c) on network change notices.
- Windstream [met with](#) Legal Advisors to Commissioners Clyburn and O’Rielly on November 7, 2017, to discuss the draft [Report and Order, Declaratory Ruling, and FNPRM](#) on the network change disclosure processes and section 214(a) service discontinuance. Windstream opposed any elimination of the improvements to the copper retirement notification process made in the 2015 Technology Transitions Order. Windstream requested the FCC modify draft paragraph 52, and it proposed that rule section 51.333(a) make clear that an ILEC must provide notice of network changes and copper retirements to those wholesale entities whose circuits are directly affected by the planned network changes or copper retirements. Windstream also requested the FCC ask questions about whether it should extend the waiting period for copper retirements that affect large numbers of circuits used by wholesale entities to provide retail service.
- INCOMPAS filed a [letter](#) on November 9, 2017, on the draft [Report and Order, Declaratory Ruling, and FNPRM](#) on further changes to the network change disclosure processes and section 214(a) discontinuance. INCOMPAS urged the FCC to refrain at this time from reducing the standard waiting period for copper retirements from 180 days to 90 days after the FCC issues its public notice. INCOMPAS also urged the FCC not to conclude that a carrier customer need not seek approval from the FCC to discontinue, reduce, or impair a service pursuant to section 214(a) when the change in service directly affects only carrier-customers.
- Public Knowledge and the Communications Workers of America [met with](#) Commissioner Clyburn’s Legal Advisor on November 2, 2017, to argue the Commission should reject the changes to the copper retirement notice and discontinuance rules proposed in the draft [Report and Order, Declaratory Ruling, and FNPRM](#). They claimed the draft Order’s proposal to completely eliminate the advance notice

requirement for retail customers and to reduce the advance notice requirement for interconnecting carriers from 180 to 90 days will leave consumers, small businesses, and anchor institutions confused and unprepared when incumbent carriers decide to retire their copper networks.

- Public Knowledge, the CWA, and the AARP met with Legal Advisors to [Chairman Pai](#) and [Commissioner O’Rielly](#) on November 7, 2017, to discuss the draft [Report and Order, Declaratory Ruling, and FNPRM](#) on the network change disclosure processes and section 214(a) service discontinuance. They suggested the FCC reject the changes to the proposed copper retirement notice and discontinuance rules, saying doing so will result in a downgrade for rural America and hurt the nation’s most vulnerable populations.
- CWA, Public Knowledge, et al. sent a [letter](#) to Chairman Pai on November 9, 2017, on the draft [Report and Order, Declaratory Ruling, and FNPRM](#) on the network change disclosure processes and section 214(a) discontinuance. They asserted replacing the section 214 discontinuance functional test with the tariff test will result in a downgrade in service for millions of rural Americans, and claimed without the functional test, carriers could deploy low-quality replacement networks that do not meet the needs of a community.
- Public Knowledge, the CWA, the Institute for Local Self Reliance, National Digital Inclusion Alliance, National Hispanic Media Coalition, Kentucky Resources Council, and the Utility Reform Network filed [ex parte comments](#) on November 9, 2017, on the Wireline Infrastructure Deployment FNPRM. They claimed the draft Order does not adequately address concerns about the reinterpretation of the definition of service under section 214, and asserted the reversal of section 214 rules in a Declaratory Ruling is in violation of the APA. They urged the Commission to maintain the functional test, fulfill its statutory mandate to protect the public interest, and fully comply with the APA.
- ADT filed a [letter](#) on November 7, 2017, on the draft [Report and Order, Declaratory Ruling, and FNPRM and Order](#) on the network change disclosure and section 214(a) discontinuance processes. ADT claimed the Order threatens to disrupt vital alarm monitoring services and creates an unfair competitive advantage for ILEC alarm company affiliates competing with ADT and other alarm companies. ADT claimed the proposed changes will enable ILECs to inform their affiliates of copper retirement or other network changes long before a customer’s existing chosen outside provider would be given notice, providing an unfair head start for the ILEC-affiliated companies to plan for such changes and to engage in marketing campaigns focused on converting and upselling their services.

## Call Completion

- The VON Coalition [met with](#) Legal Advisors to Chairman Pai and Commissioners Clyburn, O’Rielly, Carr, and Rosenworcel and Consumer Bureau staff on November 2, 2017, to reiterate: its support for elimination of rural call completion reports; its opposition to application of cramming regulations to providers of interconnected VoIP; its position that the Commission should maintain the deadlines for the transition to bill-and-keep for intercarrier compensation; and its concern that new robocall regulations not result in the blocking of legal calls or hinder the development of new technologies and services that may use telephone numbers in ways that are different than traditional wireline or wireless carriers.

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## Universal Service

- Replies were filed on November 7, 2017, on the sufficiency of budgets for Category Two services under the E-rate program. [USTelecom](#) said the FCC should reject recommendations to increase the Category 2 budget per school or library and to alter E-rate funding by permitting the shifting of E-rate funding from the building or eligible entity level to within a school district or library system. [E-rate Central](#) recommended the FCC clarify that the current Category 2 budget rules are based on rolling five-year budgets extending beyond FY 2019 for those applicants not receiving funding commitments

in FY 2015, and that the FCC has no intention of terminating funding for Category 2 equipment and services. The [Wisconsin Dept. of Public Instruction](#) expressed support for comments to continue Category Two for at least another five years beyond its 2019 expiration date and not revert back to the previous 2-in-5 year funding process. The [Council of the Great City Schools](#) urged the Commission to continue funding Category 2 services for internal connections and wireless deployment and allow the use of Category 2 budgets district-wide, rather than limiting them to the school level. The [Texas State Library and Archives Commission](#) expressed the importance of continuing the budget allocation for C2 funding. [CSM](#) said feedback from its clients indicates the Category Two per-student and floor budget amounts are not sufficient to provide the infrastructure updates needed to support ubiquitous wireless connectivity on school campuses. [Public Notice. All replies available to date.](#)

- Q Link Wireless [spoke with](#) Chairman Pai's Legal Advisor and Wireline Competition Bureau staff on November 2, 2017, to discuss the draft [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#) on Lifeline. Q Link expressed concern about the timing of the proposed elimination of port freezes, and said without a port freeze, a Lifeline consumer could commit service fraud simply by porting from one Lifeline provider to another. Q Link suggested the Commission move the consideration of the elimination (or retention) of port freezes to the NPRM portion of the draft to more carefully examine the cost-benefit tradeoffs between unfettered consumer choice in the absence of port freezes and increased costs to providers from fraud or providing multiple provider-subsidized handsets to the same customer.
- NARUC [met separately](#) with the FCC General Counsel and Legal Advisors to Chairman Pai and Commissioners Clyburn, O'Rielly, and Rosenworcel on November 1 - 2, 2017, to discuss the digital divide, Lifeline, CAF, and wireless and wireline infrastructure. NARUC said deficits in federal funding for the federal high-cost USF program must be addressed, and claimed the continued delay in the release of a Joint Board recommended decision on USF contribution reform necessarily impacts State programs. NARUC also said the FCC should not eliminate state copper retirement notifications, and asserted the composition of the BDAC lacks balance.
- NARUC will consider three telecommunications-related [resolutions](#) at its 2017 annual meeting and education conference on November 12-15, 2017. The resolutions are: E911 access and enterprise communications systems; ensuring the federal Lifeline program continues to provide services to low-income households; and bridging the digital divide.
- Sprint [met with](#) Legal Advisors to Commissioners Rosenworcel, O'Rielly, and Clyburn on November 7, 2017, to discuss the draft Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#). Sprint said it does not support the elimination of non-facilities-based service providers from the Lifeline program because of the disruption such a policy would cause for all program participants. Sprint also opposed any flash cut elimination of the broadband port freeze rule. Sprint urged the Commission to evaluate the impact the National Verifier will have on reducing waste, fraud, and abuse before considering such a radical change to the Lifeline program.
- CTIA sent a [letter](#) to Chairman Pai and Commissioners O'Rielly, Clyburn, Carr, and Rosenworcel on November 8, 2017, to express concern with the draft Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#). CTIA urged the FCC to recognize that Lifeline, especially wireless Lifeline, remains a critical tool that enables low-income consumers to access 21<sup>st</sup> Century occupational, educational, health, and public safety communications. CTIA questioned whether the proposal to limit Lifeline support to facilities-based providers would serve those goals, and said the proposal to impose a "maximum discount level" could make Lifeline-supported broadband and voice services less accessible to low-income Americans.
- TracFone Wireless [met with](#) Commissioner Clyburn's Legal Advisor on November 6, 2017, to discuss the draft Lifeline [Fourth Report and Order](#). TracFone claimed if this item is adopted, it would hamper the ability of telecommunications providers to offer Lifeline services, reduce choice and competition in the Lifeline market, depress broadband investment, and deprive low-income customers of access to the Lifeline program.

- NASUCA filed [comments](#) on November 8, 2017, opposing the part of the draft Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#) to discontinue Lifeline support for non-facilities-based service providers. NASUCA said more than 75 percent of low-income families in the Lifeline program use non-facilities-based services and elimination of this service would end its provision of critical communication services to millions of low-income households. NASUCA also said there is no credible argument that eliminating non-facilities-based service will spur investment in voice and broadband capable networks.
- The National Consumer Law Center, et al. [met with](#) Legal Advisors to Chairman Pai, Commissioners Carr, Clyburn and O’Rielly, and Wireline Competition Bureau staff on November 6 and 7, 2017, to discuss the draft Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#). They expressed concern with the proposal to remove non-facilities-based resellers from the Lifeline program, about the treatment of Tribal entities, and the need to look at the cost-benefit of the proposed Lifeline changes.
- The Lifeline Connects Coalition [met with](#) Commissioner Rosenworcel’s Legal Advisor on November 6, 2017, to discuss the draft [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#) on Lifeline. It said the draft Order is a drastic departure from the Chairman’s claims to support affordable broadband for low-income consumers suffering from the digital divide. The Coalition said the proposal to eliminate resellers should be removed or moved to the NOI.
- The Schools, Health & Libraries Broadband Coalition, along with fourteen other entities, sent a [letter](#) to Chairman Pai and Commissioners Clyburn, Carr, O’Rielly and Rosenworcel on November 9, 2017, to ask the Commission not to move forward with the draft Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#). They claimed the proposed reforms could make it impossible for many low-income consumers to obtain access to affordable broadband services.
- Native Public Media filed a [letter](#) on November 7, 2017, asking the Commission to delay a vote on the draft [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#) on Lifeline. It said the Order will have a serious, adverse effect on many low-income members of Tribal Nations who depend upon Enhance Lifeline Tribal Support for vital communications services. It also said the following proposed changes to the ELTS must be corrected: limiting ELTS to residents of rural areas on Tribal lands; using the E-rate program definition of “rural” to identify Tribal areas eligible for ELTS; tasking USAC with the creation of maps to show where ELTS is available; and limiting ELTS support to facilities-based service providers.
- The National Congress of American Indians filed a [letter](#) on November 8, 2017, to express opposition to the draft Lifeline [Fourth Report and Order](#). NCAI claimed the Order threatens to negatively change the Tribal Lands Lifeline program and limit Lifeline subsidies on Tribal lands without proper prior consultation with Tribal Nations. NCAI asserted limiting the enhanced Tribal subsidy in the manner contemplated in the draft Order contradicts the universal service principles mandated by Congress in the Communications Act and is inconsistent with the government-to-government relationship that the Commission shares with all federally-recognized Tribal Nations.
- Cherokee Nation filed a [letter](#) on November 8, 2017, to express opposition to the draft Lifeline [Fourth Report and Order](#) that would limit Lifeline subsidies on tribal lands. It said limiting access to the enhanced Tribal Lifeline subsidy based on population density ignores the uniqueness of each tribal nation and expressly ignores one of the goals of the program. It also expressed concern about the lack of Tribal consultation, and urged the Commission to ensure that timely and meaningful government-to-government consultation is executed prior to the adoption of any changes regarding the Tribal Lifeline subsidy program.
- Airvoice Wireless filed [reply comments](#) on the draft Lifeline [Fourth Report and Order](#) on November 8, 2017. It claimed the proposed changes to the tribal Lifeline program do not account for the added expenditures faced by resellers offering premium Lifeline service offerings and run counter to the public interest.

- The National Hispanic Media Coalition [spoke with](#) Commissioner Rosenworcel's Legal Advisor on November 8, 2017, to discuss concerns with the treatment of tribal nations in the draft Lifeline [Fourth Report and Order](#). NHMC said the proposed changes to the availability of enhanced Lifeline support to rural areas, elimination of enhanced Lifeline support for non-facilities-based Lifeline providers, and other changes would have significant consequences on the availability of Lifeline for tribes and tribal members.
- The Confederated Tribes of the Colville Reservation filed a [letter](#) on November 7, 2017, to express opposition to the draft [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#) on Lifeline. It claimed the proposed rule changes would have a significant and adverse impact on Tribal Nations and the FCC failed to properly consult with Tribal Nations on the proposed changes. It asked that the Office of Native Affairs and Policy schedule a consultation with affected tribes, and the FCC defer any action on this item until the consultation has been completed.
- The Oglala Sioux Tribe [met with](#) Office of Native Affairs and Policy and Wireline Competition Bureau staff on November 6, 2017, to discuss the Tribe's position on third-party verification and recertification of Lifeline eligibility. It said the recertification process does not comport with Tribal culture or abilities of subscribers, so a new method is necessary. The tribe suggested using Tribal programs that are proxies to re-certify annually.
- A group of civil rights, racial justice, media, technology, library, arts, labor, Tribal Nations, and consumer advocates sent a [letter](#) to Chairman Pai and Commissioners Clyburn, Carr, O'Rielly and Rosenworcel on November 8, 2017, to express concern with the draft Lifeline [Fourth Report and Order](#). They claimed the item will severely destabilize the program and erode Lifeline's promise to bring affordable communications services to low-income households, Tribal households, veterans, the elderly, and people with disabilities, and urged the Commission to reject the Lifeline item as currently drafted.
- The California PUC filed a [Petition](#) on November 8, 2017, seeking a temporary waiver of the Commission's Lifeline recertification and non-usage rules for subscribers affected by the recent California wildfires. The CPUC asked for a four-month suspension of the non-usage rules for subscribers in the affected counties.
- Alaska Communications filed a [letter](#) on November 3, 2017, submitting a proposal to address what it says is the immediate crisis facing rural health care providers that submitted timely funding requests to USAC for eligible services under the FCC's Rural Health Care universal service program. ACS claimed the proposal provides a path to ensure adequate funding of eligible services in funding year 2017 and beyond, and provides a method of redress for the shortfall that occurred in FY 2016 as a result of pro rata reductions to approved RHC applications filed between September 1st and November 30, 2016.
- Alaska Communications [met with](#) Chairman Pai's Legal Advisor on November 2, 2017, to discuss the need for a stable, long-term solution to budgetary issues surrounding the Rural Health Care USF support mechanism. It urged the Commission to increase the RHC program budget to account for the expanded role of telemedicine in rural America, work with USAC to mitigate the impact of the long-delays in issuing funding commitments for Funding Year 2017, and amend sections 54.609(d)(1) and (d)(3) to cap support based on the lower of the rural rate for terrestrial service or for a functionally equivalent satellite service.

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## Misc.

- The FCC released the [agenda](#) for its November 16, 2017 Open Meeting. The FCC will consider: a [Report and Order](#) that would authorize voice service providers to block certain types of robocalls that falsely appear to be from telephone numbers that do not or cannot make outgoing calls; a [Second Report and Order, Order on Reconsideration, and MO&O and Order](#) on spectrum bands above 24

GHz; a [Report and Order](#) to eliminate the requirement for historic preservation review where utility poles are replaced with substantially identical poles that can support antennas or other wireless communications equipment; a [Report and Order, Declaratory Ruling, and FNPRM and Order](#) to revise and seek comment on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes; a [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM, and NOI](#) to adopt and propose measures to bridge the digital divide for Lifeline subscribers and reduce waste, fraud, and abuse in the Lifeline program; an [Order on Reconsideration and NPRM](#) that updates the broadcast ownership and attribution rules; an [NPRM](#) seeking comment on whether to eliminate Form 325, Annual Report of Cable Television Systems; and a [Report and Order and FNPRM](#) authorizing television broadcasters to use the Next Generation TV transmission standard (ATSC 3.0) on a voluntary, market-driven basis.

- The FCC issued an [Order](#) on November 13, 2017, appointing Commissioner Carr to serve on the Federal-State Joint Board on Universal Service and the Federal-State Joint Board on Jurisdictional Separations, replacing Chairman Pai on these Boards. It also indicated Carr and Commissioner Rosenworcel will serve on the Federal-State Joint Conference on Advanced Services by virtue of their positions on the Commission.
- CTIA filed [a letter](#) on November 8, 2017, suggesting the Commission modify the draft [Report and Order](#) on robocalls to include the following clarifications: carriers will not be held liable for any good-faith call blocking by offering a safe harbor; and permissible sharing of CPNI is not limited to sharing a subscriber's Do Not Originate request, but includes any information sharing required for traceback or other robocall abatement.
- Neustar [met with](#) Legal Advisors to Chairman Pai and Commissioners Clyburn, Carr, Rosenworcel, and O'Rielly on November 6 and 7, 2017, to discuss the draft [Order](#) on robocalls. It said beyond the permissive blocking of calls, the Commission should encourage industry to use commercially-available products to provide more information to consumers about incoming calls. It claimed products that make this information available are already on the market and can be integrated in service offerings, and suggested the Commission do more to support these solutions in the forthcoming Report and Order.
- ZipDX [spoke separately with](#) Chairman Pai and Commissioner Carr's staff on November 7 and 9, 2017, to discuss robocall mitigation. It claimed the rate of robocall complaints has been rising relentlessly despite mitigation efforts to date, and asserted analysis of millions of complaints shows that even if carriers elect to implement blocks in compliance with the FCC's pending Order, only a small fraction of robocalls will be impacted. ZipDX asked the FCC to put regulatory effort into mitigation at the source of the calls by requiring all originating providers to vet their customers before providing access to volume calling resources and spoofing capability. It said they should also include a verified Charge Number in all calls to enhance traceability.
- The Consumers Union and the National Consumer Law Center filed [a letter](#) on November 9, 2017, to discuss the process through which legitimate calls should be unblocked, if they are incorrectly blocked by phone providers. They said the proposed Report and Order provides a good framework for addressing the problem of blocked legitimate calls, but the FCC should provide limits on the suggested challenge mechanism. They urged caution in considering any universal whitelist, and said if a whitelist is adopted, it should be limited to calls that are clearly true emergency calls, and phone companies should provide the opportunity to opt in to a free, advanced robocall-blocking system that automatically identifies and, if the consumer would prefer, automatically blocks unwanted calls. It also suggested phone companies be required to implement Caller ID authentication as soon as possible.
- ATIS [met separately with](#) staff from Chairman Pai's office and the [Wireline Competition Bureau](#) on November 2, 2017, to discuss industry efforts to combat unlawful robocalling, including efforts to progress the Signature-based Handling of Asserted information using toKENs (SHAKEN) framework and the SHAKEN Governance and Certification Authorities. ATIS provided an update on the industry's on-going efforts to further refine the roles and functions of the STI governance authority and STI policy administrator, and indicated it is prepared to serve as the SHAKEN Governance Authority.

- Danal filed [a letter](#) on November 1, 2017, claiming the FCC's proposed reassigned numbers database will not address the present TCPA compliance issue entirely because it is limited to number reassignment history only and does not definitively identify any given number's true owner. Danal claimed its solution is comprehensive and includes, but is not limited to, data around reassignments, deactivations, ports, and ownership verification. It recommended the FCC try its TCPA compliance solution, and proposed a safe harbor program for businesses that use any FCC certified TCPA compliance solution.
- Replies were due November 9, 2017 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.

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### Upcoming Filing Dates

- 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 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. 20 - 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. [Order](#), [Public Notice](#), [Notice](#)
- Nov. 23 - Comments due on the joint [petition](#) of Cheyenne River Sioux Tribe Telephone Authority and CenturyLink QC for a study area waiver. Replies are due December 8, 2017. [Public Notice](#)
- Nov. 23 - Comments due on the joint [petition](#) of CenturyLink and Nunn Telephone for a study area waiver to permit CenturyLink to transfer a portion of its Eaton-Ault Exchange with four subscriber lines and four other non-active end-user locations from CenturyLink to Nunn. Replies due December 8, 2017 [Public Notice](#)
- Nov. 24 - PRA comments due on a revised information collection associated with its February 24, 2017 Order that revised Part 32 reporting requirements. [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](#)

- Nov. 27 - Comments due on NTCA [petition](#) seeking temporary waiver of the updated minimum service standards applicable to fixed, wireline broadband access service eligible for Lifeline support. Replies due December 12 [Public Notice](#)
- Nov. 29 - Replies due on the specific parameters and procedures to implement the MF-II challenge process. [Public Notice \(attachment\)](#)
- Dec. 1 - Comments due on the [FNPRM](#) on the appropriate tiers for calculating terrestrial and satellite international bearer circuit fees and the methodology for calculating cable TV subscribers in multiple dwelling units. It also seeks comment on the proposal to adopt a regulatory fee for all holders of section 214 international authorizations. Replies are due December 18, 2017. [Public Notice](#)
- Dec. 4 - Comments due on the voluntary remand by the [D.C. Circuit Court](#) of the FCC's Tariff Investigation [Order](#) that found certain provisions in tariffed pricing plans for business data services offered by AT&T, CenturyLink, Frontier, and Verizon were unlawful. Replies are due December 19, 2017. [Public Notice](#)
- Dec. 4 - PRA comments due on an extension of a currently approved information collection associated with Telecommunications Reporting Worksheets, FCC Forms 499-A and 499-Q. [Notice](#)
- Dec. 5 - PRA comments due on a new information collection associated with the Mobility Fund Phase II challenge process. [Notice](#)
- Dec. 6 - Comments due on updating the record on broadband performance measures for certain CAF high-cost USF support recipients, including price cap carriers, rate-of-return carriers, rural broadband experiment support recipients, and CAF Phase II auction winners. [Public Notice](#)
- Dec. 8 - Replies due on the joint [petition](#) of Cheyenne River Sioux Tribe Telephone Authority and CenturyLink QC for a study area waiver. [Public Notice](#)
- Dec. 8 - Replies due on the joint [petition](#) of CenturyLink and Nunn Telephone for a study area waiver to permit CenturyLink to transfer a portion of its Eaton-Ault Exchange with four subscriber lines and four other non-active end-user locations from CenturyLink to Nunn. [Public Notice](#)
- Dec. 11 - Comments due on Verizon's [Petition for Waiver](#) of rule 61.74(a) when one of Verizon's FCC tariffs references another. Replies are due January 10, 2018. [Public 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. 12 - Replies due on NTCA [petition](#) seeking temporary waiver of the updated minimum service standards applicable to fixed, wireline broadband access service eligible for Lifeline Support. [Public Notice](#)
- Dec. 15 - PRA comments due on an extension of a previously approved information collection associated with Form 480 (Rural Call Completion Data). [Notice](#)
- Dec. 18 - Replies due on the [FNPRM](#) on the appropriate tiers for calculating terrestrial and satellite international bearer circuit fees and the methodology for calculating cable TV subscribers in multiple dwelling units. It also seeks comment on the proposal to adopt a regulatory fee for all holders of section 214 international authorizations. [Public Notice](#)

- Dec. 19 - Replies due on the voluntary remand by the [D.C. Circuit Court](#) of the FCC's Tariff Investigation [Order](#) that found certain provisions in tariffed pricing plans for business data services offered by AT&T, CenturyLink, Frontier, and Verizon were unlawful. [Public Notice](#)
- Dec. 26 - PRA comments due on the information collection requirements to implement sections 201 and 251, to provide for physical collocation on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, and to promote deployment of advanced telecommunications services without significantly degrading the performance of other services. [Notice](#)
- Jan. 4 - Due date for the filing of 4G LTE coverage data pursuant to the Mobility Fund II Challenge Process Order. [Public Notice](#)
- Jan. 10 - Replies due on Verizon's [Petition for Waiver](#) of rule 61.74(a) when one of Verizon's FCC tariffs references another. [Public Notice](#)

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