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### November 27, 2017 HIGHLIGHTS

- The FCC released the draft Restoring Internet Freedom [Declaratory Ruling, Report and Order, and Order](#) that will be considered at its December 14, 2017 Open Meeting. Commission statements: [Pai](#), [O'Rielly](#), [Rosenworcel](#), [Carr](#), and [Clyburn](#). Commissioner Clyburn also issued a [Fact Sheet](#).
- The FCC released the tentative [agenda](#) for its December 14, 2017 Open Meeting. In addition to the above item, it will consider, among other things, an [NPRM and Order](#) to strengthen the Rural Health Care Program.
- [Reply comments](#) were filed to update 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.
- NTCA [urged](#) the FCC to pursue readily available paths to mitigate the insufficiency of USF support. USTelecom [supported](#) both long-term and short-term solutions to ensure sufficiency within the High-Cost USF fund to support the shortfalls in funding for rural areas. Seven A-CAM RLECs from Tennessee [urged](#) the FCC to take action before the end of this year to authorize additional A-CAM funding up to \$200/month per eligible customer location.
- The Alaska Telecom Association, GCI, Copper Valley Telephone, and Bristol Bay Telephone [discussed](#) reporting requirements related to the Alaska Plan.
- The Senate Appropriations Committee released a draft financial services and general [government appropriations bill](#), in which the FCC's fiscal year 2018 budget would total \$322 million.

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### Other Key Upcoming Dates

- Nov. 27 - Comments due on NTCA's [petition](#) seeking temporary waiver of the updated minimum service standards for fixed, wireline BIAS eligible for Lifeline support. Replies due December 12. [Public 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. 29 - Replies due on the specific parameters and procedures to implement the MF-II challenge process. [Public Notice \(attachment\)](#)
- 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](#)

## Open Internet

- The FCC released a draft [Declaratory Ruling, Report and Order, and Order](#) in the Restoring Internet Freedom proceeding that will be considered at its December 14, 2017 Open Meeting. The Declaratory Ruling will: restore the classification of BIAS as an information service, reinstate the private mobile service classification of mobile BIAS, and clarify the effects of the return to an information service classification on other regulatory frameworks. The Report and Order will: adopt transparency requirements that ISPs disclose information about their practices to consumers, entrepreneurs, and the Commission, restore the Federal Trade Commission's ability to protect consumers online from any unfair, deceptive, and anticompetitive practices, and eliminate the Internet Conduct Standard, along with the bright-line rules. The Order will: find the public interest is not served by adding to the already-voluminous record in this proceeding additional materials, including confidential materials submitted in other proceedings. The Order reiterates that the broadband transmission services currently offered by RLECs under tariff differ substantially from the broadband internet access services at issue in this proceeding, and as such are not impacted by this decision to reclassify BIAS as an information service. Commissioners [O'Rielly](#), [Rosenworcel](#), [Carr](#), and [Clyburn](#) issued statements.
- Commissioner Clyburn issued a [Fact Sheet](#) on November 22, 2017, entitled *Understanding Chairman Pai's Proposal to Dismantle Net Neutrality*. The Fact Sheet defined net neutrality, discussed Pai's position on it, and provided a glossary of terms. Clyburn asserted the proposal will eliminate net neutrality.
- CenturyLink [met separately](#) with Legal Advisors to Chairman Pai and Wireline Competition Bureau staff on November 16 and 20, 2017, to say the Commission should not relinquish its authority over internet traffic exchange arrangements, sometimes called interconnection or peering agreements, and CenturyLink would oppose a declaration that the Commission has no authority at all over internet traffic exchange. CenturyLink said while the current Open Internet framework provides for authority to hear complaints only regarding the traffic exchange practices of consumer ISPs, it would be preferable for Commission jurisdiction to cover and provide for the ability to hear complaints regarding the internet traffic exchange practices of all parties engaged in such traffic exchange.
- USTelecom [met with](#) Wireline Competition Bureau and Office of Strategic Planning and Policy Analysis staff on November 20, 2017, to discuss recent declines in broadband investment and lower levels of investment in Europe. It also discussed the consumer survey conducted with NCTA, which was filed on August 28, 2017, and discussed a single federal framework for investment and delivery of broadband services.
- TechFreedom [met separately](#) with Legal Advisors to Chairman Pai and Commissioners Clyburn and Rosenworcel on November 20, 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 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.
- INCOMPAS filed a [letter](#) on November 20, 2017, to reply to what it said were inaccurate and misleading claims that the Commission need not oversee interconnection to enable an open internet and that competition in the residential broadband internet access service marketplace is sufficient to constrain BIAS behavior. INCOMPAS asserted: the record shows large BIAS providers have congested interconnection points, preventing consumers from accessing internet content over the BIAS service they have paid for; there is ample evidence that broadband providers have the incentive and ability to discriminate against OVD traffic, including by congesting interconnection points; and there is inadequate competition for residential high-speed BIAS.

- NCTA [met separately with](#) Chairman Pai's Legal Advisor and Wireline Competition and Wireless Telecommunications Bureau and General Counsel staff on November 16, 2017, to reiterate its support for restoring the Commission's prior classification of broadband internet access service. NCTA urged the Commission to include in its Order a clear, affirmative ruling that confirms the primacy of federal law with respect to BIAS as an interstate information service and that expressly preempts state and local efforts to regulate BIAS. NCTA also said if the Commission chooses to retain its transparency rule, it should eliminate the uncodified "enhancements" to the rule set forth in the Title II Order.
- The Computer & Communications Industry Association [met with](#) Commissioner Clyburn's Legal Advisor on November 16, 2017, to express concern with the direction the Commission appears set to take on Open Internet. CCIA said the Commission's action would restrict the internet freedom that consumers have enjoyed since the dawn of the commercial internet and result in massive changes to the internet ecosystem, as the Commission would abdicate its authority and eviscerate Open Internet rules that the D.C. Circuit upheld just one year ago.
- Twelve non-profit municipal broadband internet service providers [sent a letter](#) to Chairman Pai on November 21, 2017, to urge the Commission to: move forward with its proposal to end utility-style common carrier regulation of ISPs based on Title II; restore the information service classification of the service; and reinstate the bipartisan light touch approach to internet regulation so that they can again invest in networks and roll-out innovative features and services without the dark cloud of Title II regulation.
- Citizens Against Government Waste [met with](#) Commissioner Rosenworcel's Legal Advisors on November 21, 2017, to discuss Open Internet and spectrum. CAGW asserted that an open internet is not equivalent to a Title II designation, and discussed the need for a legislative solution to help guide the FCC in the future for all communications platforms. It also discussed a letter it sent to the Commission that requested reserving some of the TV white space during the spectrum repacking for innovative uses related to bridging the digital divide.
- The Electronic Frontier Foundation filed a [letter](#) on November 22, 2017, to respond to recent efforts to encourage the FCC to preempt state privacy laws. It claimed the FCC lacks legal authority to do so, saying the Communications Act does not support such a wide-reaching preemption, and said within the very provisions the preemption proponents cite in their favor, there exist similar Congressional commands to avoid construing them to limit state privacy laws.
- Netmagic Associates filed a [letter](#) on November 23, 2017, to notify the Commission it sent by email to members of Chairman Pai's staff two articles that it said expressed support for the Commission's announced action on net neutrality.
- CALInnovates met separately with Legal Advisors to [Chairman Pai](#) and [Commissioner Rosenworcel](#) on November 17 and 20, 2017, to discuss the need for clarity around the issue of pre-emption. It also reiterated CALInnovates' preference for a permanent solution to net neutrality through bipartisan Congressional legislation to affirmatively enshrine the concept into law.
- The National Hispanic Media Coalition filed a [letter](#) on November 20, 2017, to submit an analysis of Open Internet consumer complaints and related documents produced in response to its FOIA requests. The report is entitled *Consumer Perspectives on Barriers to Accessing the Open Internet*, was commissioned by NHMC, and is based solely on the consumer complaints and related documents that have been released by the Commission to date.
- The Alarm Industry Communications Committee [met with](#) Wireline Competition Bureau staff on November 15, 2017, to discuss the effects of the upcoming Restoring Internet Freedom Order on competition in the alarm industry. AICC reiterated support for continuation of the bright line rules, claiming without these rules customers may be endangered where alarm signals are not delivered in a timely fashion. AICC also expressed support for adoption of an expedited consideration process for complaints, saying in the event ISPs do block or throttle alarm signals, consumers and alarm companies need a fast track to resolve issues quickly.

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## USF Reform

- NTCA [met with](#) Chairman Pai's Advisors on November 21, 2017, to urge the Commission to pursue readily available paths to mitigate the insufficiency of USF support, including, but not limited to, the immediate use of existing program reserves to mitigate the shortfalls pending further examination of the program budget. NTCA further noted that its May 2016 [Petition for Reconsideration](#) expressly teed up the need for relief and the ensuing effects on consumer rates and carrier cost recovery, and noted the record on the Petition has been fully briefed and closed for fifteen months. NTCA also attached a summary of its 2017 USF budget control impact survey results.
- USTelecom [met with](#) Commissioner Clyburn's Legal Advisor on November 21, 2017, to expressed support for both long-term and short-term solutions to ensure sufficiency within the High-Cost USF fund to support the shortfalls in funding for rural areas. It discussed how the insufficiency of funding has effected broadband providers' ability to build out fiber to rural areas, and discussed the data showing the decline in capital investment in broadband over the last two years.
- Seven A-CAM RLECs from Tennessee filed [a letter](#) on November 21, 2017, to urge the Commission to take action before the end of this year to authorize additional A-CAM funding up to \$200/month per eligible customer location. They said the mechanism to distribute additional funds to advance broadband deployment is already in place, and if they receive additional funding now, they will be able to design their network upgrades in the most efficient manner to better serve their communities.
- The Alaska Telecom Association, GCI, Copper Valley Telephone, and Bristol Bay Telephone [spoke with](#) staff from the Wireline Competition and Wireless Telecommunications Bureaus and USAC on November 16, 2017, to discuss reporting requirements related to the Alaska Plan. They asserted the key factor in evaluating commitments is middle mile infrastructure between communities, not last mile facilities within the community, and said additional reporting beyond the scope of the Alaska Plan Order will divert significant resources from broadband service and deployment.
- The Association of Missouri Electric Cooperatives, Midwest Energy & Communications, HomeWorks Tri-County Electric Cooperative, Alger Delta Cooperative Electric Association, Great Lakes Energy, Indiana Electric Cooperatives, the Arkansas Electric Cooperatives, NRECA, NTCA, and UTC filed [a letter](#) on November 21, 2017, to address certain arguments and proposals regarding the CAF Phase II auction procedures. They discussed validating technical capability to perform, precluding speculative bids, and validating financial capability to perform. They expressed concern that some of the recommendations, if adopted, would reduce accountability and potentially undermine an efficient and fair auction process, and suggested the Commission instead strengthen the upfront short-form review.
- The American Cable Association [met with](#) Rural Broadband Auctions Task Force staff on November 17, 2017, to discuss procedures and requirements for the CAF Phase II auction. It recommended the minimum geographic unit for bidding should be a census block to maximize the number of economically viable lots, and the Commission should continue to ensure that CAF support only be used to deploy facilities and provide service in eligible areas.

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## ICC

- Reply comments were filed on November 13, 2017, to update 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. [NTCA and WTA](#) said further ICC reform cannot be effectuated while high-cost USF support mechanisms remain insufficient to enable fulfillment of universal service obligations. They urged the Commission to undertake a targeted response to any arbitrage rather than wholesale reformation that would wreak disproportionate impacts on parties who are not engaged in any of the alleged practices, and to ensure that network edge and interconnection

standards ensure the ability of rural carriers to connect broadly and affordably. They asserted IP interconnection can be guided by standards set forth by the Communications Act without regard to the underlying technology. [ERTA](#) agreed with NTCA and WTA that it is not a good time to move to bill-and-keep for other access rates and create more RLEC funding shortfalls at the expense of customers, noting the arbitrary cap on the amount of high cost USF support has cut RLEC support multiple times. ERTA opposed defining new network edges, especially if the result would increase costs for rural customers solely to increase revenues for larger companies; agreed with NRIC that no need exists to alter the access-related tandem switching and transport requirements at this time unless and until the FCC establishes a sufficient and predictable federal USF recovery mechanism; and opposed deregulating transit functions, especially if it allows large ILECs to implement new expenses for RLECs with no benefit to customers. [USTelecom](#) indicated it continues to discuss across its membership the best path forward, and has not yet settled on one consensus position or resolution for bringing this proceeding to a close, but said addressing arbitrage should be one of the Commission's top priorities. It also said edge rules must be fair and treat all providers, and eventually all traffic, alike, and it noted this proceeding would benefit from more data and analysis. [AT&T](#) said a default network edge is essential to any comprehensive reform effort because it defines the point at which the financial responsibility for transporting a call shifts from the originating carrier to the terminating carrier. It concluded each of the three general approaches identified in the Refresh Notice could, if properly designed, constitute an appropriate foundation for an end-state bill-and-keep regime, although the details will be important. The [South Dakota Telecommunications Association](#) supported NTCA and WTA's joint comments that urged the Commission to: not undertake any further ICC reforms until it both addresses the current high-cost USF shortfalls and provides for sufficient, supplemental CAF-ICC support; and ensures that states retain their responsibility for defining "network edges" and, at the same time, establishes a rural transport rule applicable to all traffic exchange that will protect RLECs from increased transport obligations. [South Dakota Network](#) said the comments support the need for the Commission to consider the unique issues associated with centralized equal access providers when considering access charge reform, and the comments also showed that access stimulation continues to be a problem, which the Commission should address quickly. [NCTA](#) opposed the ILEC requests to deregulate transit and tandem-switched transport services and shift the "network edge" to an ILEC's end office, claiming these proposals would undermine the goals of the IP transition and shift costs to the ILECs' competitors. It also suggested the Commission expand the universe of transport services that are subject to bill-and-keep to include all situations where the tandem owner and the end office owner are affiliated through an ownership or other financial relationship, and consider requiring companies still operating TDM-based networks to bear the responsibility for IP-TDM traffic conversion. The [Pennsylvania PUC](#) said the Commission should refrain from transitioning originating access and all other transport rates to bill-and-keep at this time, and should not adopt a network edge rule that preempts independent state law. It specified that any action on network edges should explicitly ensure a carrier's freedom to choose how it will deliver traffic on its side of the designated edge in order to reduce arbitrage opportunities, while ensuring adequate compensation for use of other carriers' networks. It also opposed a uniform compensatory regime for all third-party services that carriers use for indirect interconnection with a terminating carrier's network until the current reforms are completed and their results evaluated, and does not oppose Sprint's recommendation that ILECs must provide transit service pursuant to § 251(c)(2) at TELRIC rates. [Teliix](#) asserted much of the so-called 8YY aggregation occurs because of IXC conduct, and LECs providing 8YY origination service must incur major legal and regulatory costs, in addition to substantial network and operating costs, to provide 8YY originating service because large IXCs often attempt to obtain free service. It argued before taking any action on originating access reform, the Commission should do so only as a part of a larger proceeding that examines post-Transformation Order access issues, including the effects of the earlier changes on competition and consumers. [The Texas 911 Alliance, the Texas Commission on State Emergency Communications and the Municipal Emergency Communication Districts Association](#) expressed concern regarding the issue of one POI per LATA for TDM interconnection because the need for redundancy might necessitate having two POIs for 911 traffic in a LATA. They said if the Commission decides to act further to facilitate the IP transition, the associated issue of NG911 POIs should be considered in the same or a separate proceeding, including interconnection. [List of all replies available to date Order, Public Notice, Notice.](#)

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## Broadband

- The FCC issued a [Notice](#) in the Federal Register on November 27, 2017, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with the FCC's consumer broadband services testing and measurement program. The FCC stated all participation in the Measuring Broadband America Program is voluntary and no volunteers' personally identifying information will be transmitted to the Commission. PRA comments are due December 27, 2017.
- The FCC released the [Report and Order, FNPRM, Order on Reconsideration, and MO&O](#) on spectrum bands above 24 GHz, which was adopted at its November 16, 2017 [Open Meeting](#). Comments are due January 23, 2018; replies are due February 22, 2018.
- USTelecom filed [a letter](#) on November 21, 2017, to submit into the record a report entitled *2017 USTelecom Pole Attachment Rate and Pole Ownership Report*. It claimed the report shows the FCC should move forward with its proposal to create a presumption that ILECs are entitled to competitively neutral rates when attaching to investor-owned utility poles, which in turn will remove significant barriers to broadband infrastructure deployment. The report includes survey results from USTelecom's members regarding the status of nationwide pole attachment rates and pole ownership and survey results on rates charged by electric cooperatives throughout the country, including in seven states governed by the Tennessee Valley Authority.
- Verizon [met with](#) Commissioner Carr's staff on November 20, 2017, to discuss its proposal for a One-Touch Make-Ready pole attachment process to help speed fiber and small-cell deployment. It also reviewed the conclusions that Nicholas Vantzelfde of CMA Strategy Consulting reached in his recent report, and asserted his findings provide additional support for the Commission to adopt Verizon's OTMR proposal.
- The Red Cliff Band of Lake Superior Chippewa sent [a letter](#) to Chairman Pai on November 17, 2017, to submit requests, comments, and recommendations on the draft Replacement Utility Poles Report and Order. It requested the FCC share any and all available data that supports its assertion that "...the construction of a replacement for a preexisting utility pole will have no potential to affect historic properties..." and "...there is no likelihood that such pole replacements could affect historic properties." It recommended a system that would allow for tribal participation in areas where it cannot be demonstrated that tribal reviews ever occurred, and recommended language to clarify the term "previously disturbed areas."

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## Universal Service

- The Wireline Competition Bureau issued a [Public Notice](#) on November 22, 2017, announcing the opening of WC Docket No. 17-310, entitled *Promoting Telehealth in Rural America*.
- The FCC issued a [Notice](#) in the Federal Register on November 27, 2017, seeking Paperwork Reduction Act comments on a revision of a currently approved information collection associated with Lifeline/Linkup FCC Forms 555, 481,497, 5629, 5630, and 5631. This revision implements the new forms for the Lifeline program for consumer enrollment and certification, recertification, and one-per household verification. It also implements the transition to payment of the Lifeline reimbursement to ETCs based on data from USAC's NLAD database. The Commission also seeks to update the number of respondents for certain requirements contained in this information collection, thus increasing the total burden hours for some requirements and decreasing the total burden hours for other requirements. PRA comments are due December 26, 2017.
- Sprint filed a [Petition](#) on November 22, 2017, seeking reconsideration of a provision included in the [Order](#) that granted the California PUC's request for additional time to implement the federal

streamlined Lifeline eligibility programs. Sprint said the FCC's mandated shift of the compliance burden onto ETCs should California be unable to meet the April 30 deadline is unreasonable and was imposed without any opportunity for comment. Sprint also said the Order places the burden of performing the initial eligibility determination of California Lifeline applicants, and of performing requisite re-certifications of current Lifeline customers, squarely on the shoulders of the ETCs, such as Assurance Wireless, which do not have the processes or platforms in place to handle this obligation.

- [Sitka Counseling](#) and [Akeela Incorporated](#) filed letters on November 15 and 17, 2017, to express support for Alaska Communications' [proposal](#) to address 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. They both said nothing in the proposal detracts from any universal service program or moves funds from one program to another, and it draws on the relationship between programs that serve many of the same constituents.

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## Misc.

- The FCC released on November 22, 2017, the tentative [agenda](#) for its December 14, 2017 Open Meeting. The Commission will consider: a [Declaratory Ruling, Report and Order, and Order](#) that will return broadband internet access service to its prior classification as an information service and reinstate the private mobile service classification of mobile broadband internet access service; a [Report and Order](#) that would amend the Commission's Emergency Alert System rules; a [NPRM and Order](#) to strengthen the Rural Health Care Program; a [Public Notice](#) addressing co-location on twilight towers; a [Report and Order](#) to harmonize the Commission's rules by eliminating the commercial mobile radio service presumption; a [Notice of Proposed Rulemaking](#) on the electronic delivery of cable communications; and a [Notice of Proposed Rulemaking](#) to amend the national television multiple ownership rule.
- The FCC released a [Report and Order and FNPRM](#) on November 20, 2017, that was adopted at the November 16, 2017 Open Meeting, authorizing television broadcasters to use the Next Generation TV transmission standard (ATSC 3.0) on a voluntary, market-driven basis.
- The FCC published in the [Federal Register](#) on November 27, 2017, the [NPRM and NOI](#) on the regulatory and technological changes that would be required to implement complete nationwide number portability between all service providers. The NPRM proposes to eliminate the N-1 query requirement, and proposes to forbear from the dialing parity requirements for competitive LECs that have remained after the 2015 USTelecom Forbearance Order as they apply to interexchange services. The NOI seeks comment on four NNP models proposed by ATIS and on the implications of these proposals as they relate to public safety, access by individuals with disabilities, tariffs, and intercarrier compensation. Comments are due December 27, 2017; replies are due January 26, 2018.
- The Wireline Competition Bureau issued a [Public Notice](#) on November 22, 2017, announcing the LNPA Transition Oversight Manager will host a follow-up session on November 29, 2017, for contingency rollback planning focused on small service providers. Interested parties may register and find additional details for the small service provider focused session by visiting this [link](#). In addition, materials from the July 12, 2017, August 16, 2017, and October 3, 2017 contingency rollback sessions, as well as other LNPA transition reference documents, are available [here](#).
- The FCC issued a [Public Notice](#) on November 20, 2017, announcing the next meeting of the North American Numbering Council will be December 7, 2017. The primary agenda will be to introduce members of the Committee, set out initial assignments, and provide more information about the working groups. The NANC will also begin discussing how to modernize and foster more efficient number administration in the United States.

- The Senate Appropriations Committee released a draft financial services and general [government appropriations bill](#) on November 20, 2017, in which the FCC's fiscal year 2018 budget would total \$322 million. This figure is equal to the FY2018 budget request, would all come from regulatory fees, and is a reduction from the FY 2017 \$356.7 million budget, which included nearly \$16.9 million for the move of the FCC's Washington headquarters.
- NCTA [filed](#) the PRA comments on November 21, 2017, that it filed with OMB on the revised Part 32 information collection. It claimed the Commission's Part 32 Order information requirements "shift disproportionate costs or burdens onto the public," compromise program objectives, and undermine the Commission's statutory obligation to ensure that pole attachment rates are just and reasonable, and thereby fail to satisfy PRA standards. It argued the Commission claims it need not consider the burden on attaching entities, but said the process chosen by the Commission to meet its statutory obligation to ensure that ILECs do not abuse their monopoly over pole attachments depends on complaints by attaching parties rather than traditional ex ante rate-setting by the Commission. NCTA said OMB should not approve the PRA request until the Part 32 Order is corrected.

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## Upcoming Filing Dates

- 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. 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. 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](#)
- Dec. 26 - PRA comments due on a revision of a currently approved information collection associated with Lifeline/Linkup FCC Forms 555, 481,497, 5629, 5630, and 5631. [Notice](#)
- Dec. 27 - PRA comments due on an extension of a currently approved information collection associated with the FCC's consumer broadband services testing and measurement program. [Notice](#)
- Dec. 27 - Comments due on the [NPRM and NOI](#) on the regulatory and technological changes that would be required to implement complete nationwide number portability between all service providers. Replies are due January 26, 2018. [Federal Register](#)
- 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](#)
- Jan. 23 - Comments due on potential mechanisms to ensure that erroneously blocked calls can be unblocked quickly and without harm to callers and consumers, and ways to measure the effectiveness of robocalling efforts. Replies are due February 22, 2018. [FNPRM](#)
- Jan. 23 - Comments due on the [Report and Order, FNPRM, Order on Reconsideration, and MO&O](#) on spectrum bands above 24 GHz. Replies are due February 22, 2018.

- Jan. 26 - Replies due on the [NPRM and NOI](#) on the regulatory and technological changes that would be required to implement complete nationwide number portability between all service providers. [Federal Register](#)
- Feb. 22 - Replies due on potential mechanisms to ensure that erroneously blocked calls can be unblocked quickly and without harm to callers and consumers, and ways to measure the effectiveness of robocalling efforts. [FNPRM](#)
- Feb. 22 - Replies due on the [Report and Order, FNPRM, Order on Reconsideration, and MO&O](#) on spectrum bands above 24 GHz.

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