

[USF Reform](#) [Open Internet](#) [Broadband](#) [IP Transition](#) [USF](#) [Call Completion](#) [Misc.](#) [Upcoming Events](#)

December 3, 2018 HIGHLIGHTS

- Comments [are due](#) January 14, 2019, on the FNPRMs attached to the Rate-of-Return BDS [Report and Order](#). Replies are due February 12, 2019.
- USAC filed its [2018 Rate Floor Data Report](#), providing local voice service rate floor information for all carriers that are below the local urban rate floor benchmark of \$25.50.
- NTCA [expressed support](#) for the draft [RoR USF Reform Order](#) that will be voted on at the December Open Meeting. NTCA also discussed verification of Form 477 data to accurately confirm the extent of any competitive overlap, changes to the BCM calculation, pending petitions for reconsideration regarding model-based support, and other issues. ITTA [expressed support](#) for the draft [RoR USF Reform Order's](#) provisions on: increased funding for A-CAM carriers and attendant commitments to buildout to additional locations at speeds of 25/3 Mbps; ensuring sufficient and predictable support for legacy RoR carriers; a new model offer for legacy carriers; and separate budgets for the model-based and legacy programs. USTelecom [discussed](#) the draft RoR USF Order and FNPRM and how it compares with the proposals in the October 1, 2018 [association letter](#). USTelecom addressed the potential impacts of a second A-CAM offer and the lack of a challenge process in determining competitive overlap. Great Plains, et al. [expressed support](#) for adoption of a voluntary offer of additional funding up to \$200/month per location for existing A-CAM recipients, with modified deployment obligations.
- CenturyLink filed [a letter](#) in support of its [Petition for a Declaratory Ruling](#) that over-the-top VoIP providers and their LEC partners perform the functional equivalent of end office switching and, accordingly, may collect end office local switching access reciprocal compensation.
- The FCC addressed AT&T's petitions for reconsideration regarding Aureon's tariffs: an [Order on Reconsideration](#) denied AT&T's [request](#) that the FCC calculate the CLEC benchmark rate for Aureon's CEA service using the mileage that AT&T alleges CenturyLink would charge for the competitive service; and a [Second Order on Reconsideration](#) denying [AT&T's request](#) for the FCC to find that Aureon's 2012 tariff lost its deemed lawful status over time.
- [AT&T](#) and [Verizon](#) filed comments on the [Public Notice](#) proposing to expand the list of interoperable devices for service discontinuance applications. Replies are due December 13, 2018.
- USAC filed the [Federal Universal Service Support Mechanisms Quarterly Contribution Base](#) for First Quarter 2019.

Other Key Upcoming Dates

- Dec. 7 - Replies [due](#) on the applicability of the [John S. McCain National Defense Authorization Act for Fiscal Year 2019](#) to the FCC's supply chain rulemaking and to the programs the Commission oversees.
- Dec. 13 - Replies [due](#) on expanding the list of interoperable devices for discontinuance applications.

USF Reform

- NTCA [met with](#) Advisors to Commissioners O’Rielly, Carr, and Rosenworcel on November 27, 2018, to express strong support for the draft RoR USF Reform Order that will be voted on at the December Open Meeting. NTCA also discussed verification of Form 477 data to accurately confirm the extent of any competitive overlap, proper calibration of buildout obligations to reflect increased speed targets, changes to the budget control mechanism calculation, the per-line cap on cost-based support, and pending petitions for reconsideration regarding model-based support. NTCA also [met separately with](#) Chairman Pai’s Special Counsel and Wireline Competition Bureau staff on November 29, 2018, to discuss the same issues.
- ITTA [met with](#) Advisors to Chairman Pai and Commissioner Carr on November 27, 2018, to express support for the draft [RoR USF Reform Order’s](#) provisions related to: increased funding for A-CAM carriers and attendant commitments to buildout to additional locations at speeds of 25/3 Mbps; ensuring sufficient and predictable support for legacy rate-of-return carriers; a new model offer for legacy carriers; and separate budgets for the model-based and legacy programs. It also reiterated that the draft’s provisions for funding the A-CAM programs and legacy mechanisms would have a de minimis impact on consumers’ bills.
- USTelecom [met with](#) Commissioner O’Rielly’s Advisor and intern on November 29, 2018, to discuss the draft Rate-of-Return USF Order and FNPRM and how it compares with the proposals in the October 1, 2018 [association letter](#). USTelecom specifically addressed the potential impacts of a second A-CAM offer and the lack of a challenge process in determining competitive overlap.
- Great Plains Communications, Consolidated Companies, and Matthey Consulting [met separately with](#) Commissioners O’Reilly and [Carr](#), their Advisors, and Commissioner Rosenworcel’s Advisor on November 28 and 29, 2018, to express support for adoption of a voluntary offer of additional funding up to \$200/month per location for existing A-CAM recipients, with modified deployment obligations. They also supported extending a new offer of A-CAM support to all companies not currently receiving A-CAM support and not limiting such an offer to those companies that would receive less support under the model than their current support. They also discussed the status of current proceedings before the Nebraska PSC to determine support levels provided to rate-of-return carriers through the Nebraska USF to advance a state goal of 25/3 Mbps broadband.
- Mescalero Apache Telecom [met with](#) Commissioner O’Rielly’s Advisors on November 27, 2018, to request that Commissioner O’Rielly support the adoption of an Order on Reconsideration that will allow MATI to avail itself of the relief provided in the Tribal Opex Order. MATI explained the process it used to determine that it does not, in fact, serve 90 percent of customers with 10/1 Mbps broadband service and should therefore be subject to the relief provided in the Tribal Opex Order.
- GVNW [spoke with](#) Wireline Competition Bureau staff on behalf of Arctic Slope Telephone Association Cooperative on November 26, 2018, to provide an update on ASTAC’s Alaska Plan wireline obligations.
- Sen. Joe Manchin (D-WV) issued [a press release](#) on November 27, 2018, announcing he has submitted a formal challenge (not available) to the Mobility Fund Phase II initial eligible areas map. He claimed the data he submitted proves the coverage map released by the FCC does not accurately depict broadband coverage throughout West Virginia. In May, the FCC granted Sen. Manchin a waiver to participate as a challenger in the Mobility Fund Phase II challenge process.
- Senator Jeanne Dietsch (D-NH) filed a [Petition for Waiver](#) on November 27, 2018, of the rule regarding specific cellular phone sets to be used in the MF-II Challenge Process. She said the wrong T-Mobile sets were purchased initially and the non-compliant sets were replaced with acceptable sets after September, but there are approximately 2500 test records that were collected on the wrong sets. She said T-Mobile was notified of the situation and has agreed to support a request for a waiver.

- The Rural Wireless Association filed [a letter](#) on November 26, 2018, opposing NARUC's request for a second Mobility Fund II challenge process extension to March 15, 2019, asserting such an extension is unlikely to yield additional test points that are statistically significant and will only cost prospective challengers additional time and money. RWA instead urged the Commission to address the problem underlying the MF II challenge process by investigating the 4G LTE coverage claimed by Verizon and require re-filing of Verizon's data to correct its overstated coverage.
- Missouri RSA 5 Partnership, d/b/a Chariton Valley Wireless Services, filed [a Petition](#) on November 26, 2018, requesting the FCC correct the underlying subsidy data and the resulting Mobility Fund Phase II map of areas presumptively eligible and ineligible for MF II support. Chariton Valley also requested a waiver of the MF II challenge process procedures to allow a brief extension of the time period to drive test and submit challenge data related to presumptively ineligible areas in the areas subject to correction. It claimed the current version of the MF II map fails to reflect that Chariton Valley and USCOC of Greater Missouri (US Cellular) are subsidized providers in a large triangular area in Chariton County, Missouri, and therefore renders numerous census blocks in the Subsidized Area as presumptively ineligible for MF II support. It claimed upon correction, additional census blocks in the Subsidized Area will be presumptively eligible for support and additional census blocks will be reflected as served by only one, unsubsidized provider, making these areas reasonable to drive test and challenge.
- Sunset Digital Communications filed a [Petition for Waiver](#) on November 26, 2018, to allow it to acquire and assume SDC Inc.'s rights and obligations as a CAF Phase II auction winner. It claimed grant of the waiver would permit an influx of significant new capital as well as access to technical and operational experience of Point Broadband and ITC.

[Back to Highlights](#)

ICC

- CenturyLink filed [a letter](#) on November 28, 2018, in support of its [Petition for a Declaratory Ruling](#) that over-the-top VoIP providers and their LEC partners perform the functional equivalent of end office switching and, accordingly, may collect end office local switching access reciprocal compensation under the Commission's rules. It said AT&T's proposed reading of the VoIP Symmetry Rule would draw an arbitrary and capricious line between forms of VoIP that are compensable and forms of VoIP that are not compensable, yet AT&T has failed to explain which call scenarios permit a LEC to assess end office switching charges and which do not, and why. CenturyLink claimed it would be impossible for AT&T to do so. It suggested if the Commission decides to embrace AT&T's approach, it will have to explain when access charges are available and when they are not, and provide a reasoned basis for any distinctions it might draw.
- The FCC issued an [Order on Reconsideration](#) on November 28, 2018, dismissing and denying [AT&T's Petition for Reconsideration](#) of the [Order](#) that concluded the investigation into the lawfulness of the interstate switched transport rate contained in Aureon Network Services' Transmittal No. 36 of Tariff F.C.C. No. 1. The FCC denied AT&T's request that the Commission calculate the CLEC benchmark rate for Aureon's centralized equal access service using the mileage that AT&T alleges CenturyLink, the competing ILEC, would charge for the competitive service. The FCC found AT&T's arguments on reconsideration to be procedurally and substantively flawed, and said AT&T's Petition relies on arguments already considered and rejected in this proceeding and offers no new facts.
- The FCC issued a [Second Order on Reconsideration](#) on November 28, 2018, dismissing and denying [AT&T's Petition for Further Reconsideration](#) of the [Order on Reconsideration](#) that affirmed the FCC's findings that Aureon Network Services' 2013 Tariff was not "deemed lawful," but that Aureon's 2012 Tariff remained in effect unless and until AT&T can establish that Aureon employed improper accounting practices to conceal potential rate of return violations. AT&T argued the FCC should find that the 2012 Tariff lost its deemed lawful status over time. The FCC said AT&T's Petition repeated

many arguments the Commission has already fully considered and rejected, and said the 2012 Tariff remains in effect.

- Aureon Network Services filed its [Direct Case](#) on November 28, 2018, in the [proceeding](#) investigating the lawfulness of its tariff revisions to its Tariff No. 1, filed on September 24, 2018. Aureon said the FCC should find that Aureon's tariff rate is lawful, that its good faith fair market value estimates are reasonable, and that its updated cost study fully supports Aureon's filed rate. Aureon said if the Commission determines that additional information is needed to support Aureon's good faith estimate, and that there is no additional data available for Aureon to make a good faith fair market value estimate, Aureon requested a waiver (if the FCC decides to regulate Aureon as an ILEC rather than a CLEC) of the requirement to comply with the fair market value showing in section 32.27(c).
- The Wireline Competition Bureau issued an [Order](#) on November 29, 2018, designating for investigation the appropriate benchmark rate for South Dakota Network's interstate switched access service that is contained in its tariff revisions filed on September 17, 2018. SDN's direct case is due December 11, 2018; oppositions to the direct case are due December 18, 2018.
- South Dakota Network filed [a copy](#) of its response on November 26, 2018, to James Valley Cooperative Telephone Company and Northern Valley Communications' Petition to reject or suspend and investigate SDN's Tariff Transmittal No. 13. It said on September 27, 2018, SDN filed to remove the language in section 5.1 about which Petitioners complain, and therefore this objection is moot. SDN also claimed Petitioners' remaining complaints are not correct and they are without merit and, accordingly, SDN's tariff should be allowed to go into effect.
- South Dakota Network filed [a letter](#) on November 26, 2018, to provide FCC staff with the attached redacted spreadsheet regarding its total known and measurable investments projected between December 31, 2017 and June 30, 2019. South Dakota Network also filed [a redacted letter](#) on November 27, 2018, to provide information at the request of Commission staff from its 2018 annual TRP, among other things.
- Native American Telecom Companies filed [a letter](#) on November 30, 2018, to address the conflicting comments submitted in the access arbitrage proceeding and to urge the Commission to take a more expansive look at the facts. They said they are not convinced there is a problem that requires a regulatory solution, claiming problems are being resolved through negotiation, commercial arrangements, and, in some cases, legal and regulatory complaints. They suggested the Commission adopt an expedited formal complaint or arbitration process instead to deal with any intercarrier compensation disputes, similar to the arbitration provisions of the 1996 Act.
- No comments were filed on Interstate Telecommunications Cooperative's [Petition](#) for a waiver of sections 51.909(a), 51.917(b)(1) and 51.917(b)(7) to allow it to recalculate the rate bands and charges for local switching, tandem switching, and dedicated transport services for two study areas it seeks to merge on January 1, 2019. Replies are due December 12, 2018. [Public Notice](#)

[Back to Highlights](#)

IP Transition

- Comments were filed November 28, 2018, on the [Public Notice](#) proposing to expand the list of key applications and functionalities for which a carrier must demonstrate interoperability when requesting to discontinue a legacy voice service pursuant to the adequate replacement test. [AT&T](#) said the interoperability component of the adequate replacement test is fundamentally misconceived and should be revisited. AT&T indicated it would have less concern with an interoperability component if the Commission determines that certain types of equipment are sufficiently critical and sufficiently dependent on legacy POTs service that interoperability is necessary, but the interoperability component was adopted without any such inquiry. AT&T suggested the Commission eliminate the interoperability prong of the adequate replacement test and consider any interoperability issues that

are raised in the course of a pending section 214 application on a case-by-case basis, taking into account the criticality of the device, the number of users, and the availability and use of alternative devices or services. [Verizon](#) said the goal of this proceeding is to streamline, not to complicate, the nation's IP transition. It suggested the Commission recognize that consumers are already voting with their wallets by migrating to services that do not depend on now-dated networks. Verizon said the Commission should eliminate or reduce the adequate replacement test's interoperability list – it certainly should not expand the list. Reply comments are due December 13, 2018.

[Back to Highlights](#)

Broadband

- The FCC issued an [Erratum](#) on November 29, 2018, to the September 27, 2018 [Declaratory Ruling and Third Report and Order](#) on wireless infrastructure deployment. The Erratum corrected a footnote and amended Appendix A regarding sections 1.40001 and 1.6100.
- Petitioners [City of San Jose, et al.](#) filed a [Motion](#) on November 29, 2018, asking the Tenth Circuit Court to transfer to the Ninth Circuit Court the case addressing petitions for review of the September 2018 [Declaratory Ruling and Report and Order](#) on wireless infrastructure deployment. San Jose, et al. indicated some of the other petitioners supported this transfer request, while others opposed it. Petitions for Review were also filed by: [PRTC](#); [Verizon](#); [City of Seattle, et al](#); [City of Huntington Beach](#); and [Sprint](#).
- Verizon filed a [letter](#) on November 26, 2018, addressing concerns with the page length of its [opposition](#) to the petitions for reconsideration of the August 3, 2018 [Wireless Infrastructure Deployment Order and Declaratory Ruling](#). Verizon asserted its opposition was properly filed and is consistent with the applicable page limits in the Commission's rules. Verizon said for administrative convenience, the Commission adopted uniform deadlines for oppositions and replies for petitions to reconsider any portion of the August 3, 2018 item, but it did not change the applicable page limits. Verizon said it filed a combined opposition to both sets of petitions in the interest of convenience and efficiency, and said to the extent there is any concern about the length of its filing, it asked the Commission for waiver.
- Comcast [met with](#) Acting Special Counsel to Chairman Pai, Commissioner O'Rielly's Legal Advisor, Chiefs of Staff to Commissioners Carr and Rosenworcel, and Wireline Competition Bureau staff on November 26, 2018, to discuss the proceeding on Form 477 data. Comcast discussed the challenges associated with submitting address-level information, saying that data could not be provided in that format in an accurate or timely fashion. Comcast suggested the Commission initiate a pilot program to explore the feasibility of submitting deployment data at the road/street segment level, claiming this approach would provide the Commission with much more granular data than it obtains today and could be prepared and submitted by service providers relatively quickly.
- Sonic Telecom and INCOMPAS [met with](#) Chairman Pai's Wireline Advisor, Chiefs of Staff to Commissioners Carr and Rosenworcel, and Wireline Competition Bureau staff on November 27 and 28, 2018, to discuss USTelecom's [Petition](#) for Forbearance from certain regulatory obligations imposed on ILECs. Sonic claimed granting the Petition would impair 5G deployment and would end fiber deployment by Sonic and others that use unbundled network elements as a bridge to fiber.

[Back to Highlights](#)

Call Completion

- The FCC published a [Notice](#) in the Federal Register on November 27, 2018, seeking PRA comments on the information collection required by the Improving Rural Call Quality and Reliability Act of 2017, which requires the Commission to establish a registry for intermediate providers and requires intermediate providers to register with the Commission before offering to transmit covered voice communications. Comments are due December 27, 2018.

- Verizon [met with](#) Wireline Competition Bureau staff on November 8, 2018, to discuss implementation of the Improving Rural Quality and Reliability Act of 2017 and the ongoing intercarrier compensation proceedings. Verizon said several open ICC proceedings are ripe for decision, and the NPRM on access stimulation, which would address terminating tandem and transit charges that have not yet transitioned to bill-and-keep, is most relevant to rural call completion. It also urged the Commission to adopt flexible service quality standards for intermediate providers and to eliminate the data recording and retention requirements upon full implementation of the RCC Act.

[Back to Highlights](#)

Universal Service

- USAC filed its [2018 Rate Floor Data Report](#) on November 27, 2018, providing local voice service rate floor information for all carriers that are below the local urban rate floor benchmark of \$25.50. It said beginning in July 2018 HCLS and frozen high-cost support based on previous high-cost model support will be reduced where a carrier's local end-user rates plus state regulated fees do not meet the urban rate floor. (Note: On May 19, 2017, the FCC released an [NPRM and Order](#) freezing the local service rate floor at \$18 until the FCC reviews its rate floor policy, or for no more than two years, until July 1, 2019.)
- USAC filed the [Federal Universal Service Support Mechanisms Quarterly Contribution Base](#) for First Quarter 2019 on November 30, 2018. The total projected collected interstate and international end-user revenue base to be used in determining the contribution factor for the USF Support Mechanisms for First Quarter 2019 is \$12,289,162,461, down from \$12,406,691,101 in the previous quarter.
- The Wireline Competition Bureau released a [Public Notice](#) on November 30, 2018, granting, denying, and dismissing various petitions related to actions taken by USAC on E-rate and USF contributions. Petitions for reconsideration or applications for review of these decisions must be filed within 30 days of the Public Notice.
- The Wireline Competition Bureau issued a [Public Notice](#) on November 27, 2018, to announce the launch of the National Lifeline Eligibility Verifier in Missouri, North Carolina, Pennsylvania, and Tennessee as of December 4, 2018. The Bureau said as with previous states where the National Verifier has been launched, the next four states joining the National Verifier on December 4, 2018, will have a soft launch period before fully launching, which will allow ETCs to become familiar with the National Verifier and adjust and test their systems and business processes before use of the National Verifier becomes mandatory.
- In addition to comments filed by [TracFone Wireless](#), which was reported in last week's REGScan, the [National Lifeline Association](#) filed comments on November 23, 2018, in support of Q Link Wireless' [Petition](#) for a limited waiver to use an alternative means to obtain Lifeline National Verifier confirmation of an applicant's eligibility in states in which a hard launch of the national verifier occurs prior to resolution of Q Link's [Petition](#). NLA supported Q Link's waiver solution for all ETCs only as an interim solution, and said the Commission and USAC must promptly move to implement a service provider API in the National Verifier to facilitate an efficient and effective enrollment process that serves consumers while safeguarding the Lifeline program through an independent determination of eligibility. Replies were due November 30, 2018. [Public Notice](#)
- WTA and CoBank [met with](#) Advisors to Chairman Pai and Commissioners O'Rielly, Carr, and Rosenworcel on November 26, 2018, to discuss the [NOI](#) on promoting telehealth for low-income consumers. CoBank discussed its telemedicine pilot program launched in January 2018 in Southwest Georgia and the Rural Health Initiative, a joint nationwide initiative formed by CoBank, WTA Foundation, and Perry Health, to improve access to high-quality healthcare in rural America. WTA discussed its recent [reply comments](#), which discussed the importance of the USF High Cost program in ensuring that rural Americans can use telehealth solutions. WTA and CoBank [also met with](#) Wireline Competition Bureau staff to discuss the same issues.

- The Schools, Health & Libraries Broadband Coalition, New England Telehealth Consortium, and the California Telehealth/OCHIN Broadband Network Services [spoke with](#) Commissioner O’Rielly and his Advisors and Wireline Competition Bureau staff on November 21, 2018, to discuss their frustration with the lack of transparency with the Rural Health Care Program and the pace of funding decisions for 2018 applicants. They asked the Commission to follow through on the underlying rulemaking proceeding to modernize the RHC Program and expressed support for the proposed Connected Care pilot program.
- Hughes Network Systems [met with](#) Wireline Competition Bureau staff on November 29, 2018, to discuss its recommendations for the proposed Connected Care Pilot Program. Hughes asserted the FCC should focus on funding projects that encourage and facilitate broadband adoption, rather than new network deployments, and selection criteria should ensure the widest possible participation by broadband technologies.
- The Utah Education and Telehealth Network filed [two appeals](#) on November 26, 2018, of USAC’s denial of Rural Health Care funding requests for funding year 2017. In the first [appeal](#), UETN asserted USAC confused contract signature dates with the signature dates of the amendments to these contracts that came subsequently, and it asked the Commission to waive the 28-day competitive bidding period for three FRNs and remand these funding requests to USAC for review. In the other [appeal](#), UETN asked the Commission to overturn USAC’s denial of seven FRNs and allow USAC to review these funding requests on their merits.
- ATN International [met with](#) Chairman Pai and Commissioner Carr and their Advisors and Advisors to Commissioners O’Rielly and Rosenworcel on November 27, 2018, to discuss Stage 2 of the Connect USVI Fund. ATN asserted the most effective and expeditious way to bring the Stage 2 Connect USVI funding to bear would be to provide the funding to Viya, the sole ILEC charged with serving the USVI in its entirety as the carrier of last resort and the sole operator of a territory-wide wireline broadband network.
- The Wireline Competition Bureau issued a [Public Notice](#) on November 29, 2018, seeking comment on Sunset Digital Communications’ [Petition](#) seeking ETC designation in Tennessee and Virginia for the purpose of receiving CAF Phase II support. Comments are due December 13, 2018; replies are due December 20, 2018.
- Plains Internet filed a [letter](#) on November 28, 2018, withdrawing its [Petition](#) seeking ETC designation in Texas to receive CAF Phase II support. Plains said the state commissions will exercise jurisdiction for the ETC designation.

[Back to Highlights](#)

Misc.

- The FCC [published](#) in the Federal Register on November 29, 2018, the two FNPRMs that accompanied the [Report and Order](#) that allows certain RLECs that receive fixed high-cost support to transition from RoR regulation to incentive regulation for their business data services. The FNPRMs seek comment on creating a pathway to ending ex ante pricing regulation for the lower speed TDM-based transport services of RoR carriers opting into the incentive regulation framework and on the proposal to remove pricing regulation of the TDM transport services of price cap carriers pursuant to the remand in the Eighth Circuit Court’s decision on the 2017 price cap BDS rules. Comments are due January 14, 2019; reply comments are due February 12, 2019. The Wireline Competition Bureau issued a [Public Notice](#) on November 29, 2018, announcing that comment and reply due dates were published in the [Federal Register](#).
- The Joint Committee on Telecommunications, Utilities, and Energy of the Massachusetts Legislature filed [a letter](#) on November 1, 2018, to encourage the FCC to adopt new rules to combat unlawful robocalls. It specifically supported: maintaining existing rules on which types of calls can be blocked by

providers and expanding them to include other types of calls that are likely to be illegal; encouraging service providers to implement the STIR and SHAKEN protocols; and requiring phone companies to implement caller ID authentication technologies and offering call-blocking tools to all customers at no cost.

- The American Cable Association [met with](#) Commissioner Rosenworcel's Legal Advisor on November 26, 2018, to discuss ACA's proposal that the Commission affirm voice providers' ability to offer robocall blocking tools to their customers on an informed opt-out basis. ACA said there is interest among ACA members in deploying robocall blocking tools on an opt-out basis, but also reluctance to make the sizable investments necessary to do so without the same legal clarity that the Commission has afforded providers who offer these tools on an opt-in basis. ACA requested the Commission promptly issue a declaratory ruling that affirms voice providers' ability to offer robocall blocking tools to their customers on an informed opt-out basis.
- The Wireline Competition Bureau issued a [Public Notice](#) on November 29, 2018, seeking comments on an [application \(supplement\)](#) filed by Curtis H. Hunt and Herman C. Roark (Transferors) and Hilliary Acquisition B2B (Transferee) for transfer of control of Border to Border Communications from Transferors to Hilliary. Comments are due December 13, 2018; replies are due December 20, 2018.
- Hilliary Acquisition B2B (Transferee) filed a [supplement](#) on November 28, 2018, to the [application](#) it filed with Curtis H. Hunt and Herman C. Roark (Transferors) for transfer of control of Border to Border Communications from Transferors to Hilliary and the blanket domestic 214 authorization held by Transferors to Hilliary.
- The Wireline Competition Bureau issued a [Public Notice](#) on November 27, 2018, announcing that the [Report and Order](#) that revised certain toll free numbering rules to promote the efficient allocation of toll free numbers was published in the [Federal Register](#) on October 23, 2018, and the rules in the Order are effective November 23, 2018.
- The FCC issued a [Public Notice](#) on November 27, 2018, seeking comments on Hadlo Technologies' application seeking authorization to obtain NANP telephone numbers directly from the Numbering Administrators for its iVoIP service. Comments are due December 12, 2018.

[Back to Highlights](#)

Upcoming Filing Dates

- Dec. 3 - PRA comments due on an extension of a currently approved information collection associated with FCC Forms 492 and 492-A, Rate-of-Return Monitoring Reports. [Notice](#)
- Dec. 3 - Replies due on the [Public Notice](#) requesting comments on whether certain docketed proceedings listed in the attachment to the Public Notice should be terminated as dormant. [FR](#)
- Dec. 4 - Comments due on an [application](#) filed by Robert L. Hart and STEL-CO, requesting consent for the transfer of control of Le-Ru Telephone and its wholly-owned subsidiary, Le-Ru Long Distance Company, from Mr. Hart to STEL-CO. Replies are due December 11, 2018. [Public Notice](#)
- Dec. 5 - Oppositions due to Aureon's direct case in connection with its Tariff No. 1 revisions filed on September 24, 2018. [Order](#)
- Dec. 7 - Replies due on the applicability of the [John S. McCain National Defense Authorization Act for Fiscal Year 2019](#) to the FCC's Protecting Against National Security Threats to the Communications Supply Chain rulemaking and to the programs the Commission oversees. [Public Notice](#)
- Dec. 10 - PRA comments due on an extension of a currently approved information collection associated with Part 64 pay-per-call rules. [Notice](#)

- Dec. 11- Replies due on an [application](#) filed by Robert L. Hart and STEL-CO, requesting consent for the transfer of control of Le-Ru Telephone and its wholly-owned subsidiary, Le-Ru Long Distance Company, from Mr. Hart to STEL-CO. [Public Notice](#)
- Dec. 12 - Comments due on Hadlo Technologies' application seeking authorization to obtain NANP telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)
- Dec. 12 - Replies due on Interstate Telecommunications Cooperative's [Petition](#) for a waiver of sections 51.909(a), 51.917(b)(1) and 51.917(b)(7) to allow it to recalculate the rate bands and charges for local switching, tandem switching, and dedicated transport services for two study areas it seeks to merge on January 1, 2019. [Public Notice](#)
- Dec. 13 - Comments due on Sunset Digital Communications' [Petition](#) seeking ETC designation in Tennessee and Virginia for the purpose of receiving CAF Phase II support. Replies are due December 20, 2018. [Public Notice](#)
- Dec. 13 - Replies due on expanding the list of key applications and functionalities for which a carrier must demonstrate interoperability when requesting to discontinue a legacy voice service pursuant to the adequate replacement test. [Public Notice](#)
- Dec. 13 - Comments due on an [application \(supplement\)](#) filed by Curtis H. Hunt and Herman C. Roark (Transferors) and Hilliary Acquisition B2B (Transferee) for transfer of control of Border to Border Communications from Transferors to Hilliary. Replies are due December 20, 2018. [Public Notice](#)
- Dec. 18 - Oppositions due to SDN's direct case in the proceeding on the appropriate benchmark rate for SDN's interstate switched access service that is contained in its tariff revisions filed on September 17, 2018. [Order](#)
- Dec. 20 - Replies due on Sunset Digital Communications' [Petition](#) seeking ETC designation in Tennessee and Virginia for the purpose of receiving CAF Phase II support. [Public Notice](#)
- Dec. 20 – Replies due on an [application \(supplement\)](#) filed by Curtis H. Hunt and Herman C. Roark (Transferors) and Hilliary Acquisition B2B (Transferee) for transfer of control of Border to Border Communications from Transferors to Hilliary. [Public Notice](#)
- Dec. 24 - PRA comments due on an extension of a currently approved information collection regarding section 51.803, Procedures for Commission Notification of a State Commission's Failure to Act and Supplemental Procedures for Petitions Pursuant to section 252(e)(5). [FR](#)
- Dec. 27 - PRA comments due on the information collection required by the Improving Rural Call Quality and Reliability Act of 2017, which requires the Commission to establish a registry for intermediate providers and requires intermediate providers to register with the Commission before offering to transmit covered voice communications. [Notice](#)
- Jan. 14 - Comments due on the Second FNPRM and FNPRM that accompanied the [Report and Order](#) that allows certain RLECs that receive fixed high-cost support to transition from RoR regulation to incentive regulation for their business data services. Reply comments are due February 12, 2019. [FR](#)
- Feb. 12 -Replies due on the Second FNPRM and FNPRM that accompanied the [Report and Order](#) that allows certain RLECs that receive fixed high-cost support to transition from RoR regulation to incentive regulation for their business data services. [FR](#)

[Back to Highlights](#)

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