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December 4, 2017 HIGHLIGHTS

- [Chairman Pai](#) and Commissioners [Carr](#) and [O'Rielly](#) gave speeches on open internet. Chairman Pai also issued a [fact sheet](#) on the upcoming Restoring Internet Freedom Order. Commissioner Clyburn [responded](#) to Pai's dissent from the 2015 Open Internet [Order](#), and wrote a [post](#) on the draft Order.
- The FCC [announced](#) OMB approval, back dated to September 2016, of the information collection requirements associated with the amendments to sections 51.917(f)(4), 69.4(k), 69.132, 69.311, and 69.416, adopted in the 2016 RoR Reform Order. They are effective December 4, 2017.
- NTCA [discussed](#) the need to remedy shortfalls in high-cost USF support for the model-based and cost-based USF programs. USTelecom [discussed](#) its 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.
- Seven Georgia RLECs who have accepted A-CAM support filed [a letter](#) to urge 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. Similar letters were also filed by [28 Minnesota RLECs](#), [six Oklahoma RLECs](#), [Five Washington RLECs](#), [30 Wisconsin RLECs](#), and [three Arizona RLECs](#).
- [Replies](#) were filed on the parameters and procedures to implement the MF-II challenge process.
- The Wireline Competition Bureau [seeks comment](#) on Venture's Petition for Waiver of Part 51 rules to implement its planned January 1, 2018 merger of two commonly-owned and merged study areas in the same state. Comments are due December 19, 2017; reply comments are due January 3, 2018.
- The FCC released the [Order and FNPRM](#) on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. Comments are due January 17, 2018; replies due February 16, 2018.
- The WCB [announced](#) comments are due December 27, 2017, on the [NPRM and NOI](#) on nationwide number portability between all service providers. Replies due January 26, 2018.
- The [Report and Order](#) allowing law enforcement authorities to access blocked caller ID information [is effective](#) January 2, 2018
- The FCC released the Lifeline [Fourth Report and Order, Order on Reconsideration, MO&O, NPRM and NOI](#). Comments are due January 24, 2018; replies are due February 23, 2018.
- WTA filed [comments](#) supporting NTCA's [Petition](#) for a temporary waiver of the updated minimum service standards applicable to fixed, wireline BIAS eligible for Lifeline support. Replies are due December 12, 2017. [Public Notice](#)
- USAC filed the [Federal Universal Service Support Mechanism Quarterly Contribution Base](#) for First Quarter 2018. Revenues are projected to be down from the previous quarter.

Other Key Upcoming Dates

- Dec. 6 - Comments due to update the record on broadband performance measures for certain CAF high-cost USF support recipients, including price cap carriers, RoR carriers, rural broadband experiment support recipients, and CAF Phase II auction winners. [Public Notice](#)

Open Internet

- [Chairman Pai](#) and Commissioners [Carr](#) and [O’Rielly](#) spoke at Lincoln Network and R Street Institute’s symposium on internet freedom on November 28, 2017. [Pai](#) asserted the plan to restore internet freedom will bring back the same legal framework that was governing the internet three years ago and that has governed the internet for most of its existence. He asserted the reason he is proposing to return to the pre-2015 regulatory framework is that it was an overwhelming success. Pai also responded to criticisms of the plan. Carr and O’Rielly both expressed support for Chairman Pai’s proposal to repeal the 2015 Open Internet Order. [Carr](#) claimed Title II regulation has imposed significant costs, and reversing Title II will put a tried and true framework back in place and will power the deployment, investment, and innovation that will benefit American consumers. [O’Rielly](#) said preemption is necessary to avoid market disrupting regulation, and said Congress is the appropriate venue for any net neutrality rules.
- Chairman Pai issued a [Fact Sheet](#) on November 29, 2017, entitled *Myth vs. Fact; Setting the Record Straight on Chairman Pai’s Restoring Internet Freedom Order*, which discusses rumors about the proposed Order.
- Commissioner Clyburn released a [document](#) on November 30, 2017, entitled *Debunking Chairman Pai’s Claims About Net Neutrality*, to respond to his dissent from the 2015 Open Internet [Order](#). She said some of his predictions, including “courts will not countenance this unlawful power grab” and “the Order will countenance price regulation,” are false, as the D.C. Circuit Court has twice upheld the 2015 Order and no broadband prices have been regulated in the years since the Order.
- Commissioner Clyburn wrote a [post](#) for Medium.com on November 29, 2017, entitled: *The FCC Should Not Give Broadband Providers the Keys to your Internet Freedom*. She said her fellow Commissioners would benefit from hosting their own public forums and listening to the concerns raised by consumers and small businesses as doing so would allow them to hear first-hand what it means to access the internet without fear that their broadband provider will slow down or block their favorite online applications and services. She also said the Commission’s Restoring Internet Freedom proposal tramples over the rights of these communities and will prevent it from adopting any related consumer protections.
- NARUC [met with](#) Commissioner Clyburn’s Legal Advisor on November 28, 2017, to discuss the draft Restoring Internet Freedom Order. NARUC claimed the section on preemption of inconsistent state and local regulations is both unnecessary and overbroad. NARUC also asserted the discussion of the FCC’s forbearance authority cannot be squared with Congressional reservations of authority, and asserted the FCC has the power to forbear from application of specific provisions of the 1996 Act – not independent state law.
- Comcast [spoke with](#) Commissioner O’Rielly’s Legal Advisor on November 28, 2017, to reiterate the need for a clear, affirmative ruling on federal preemption of state and local regulation of broadband internet access service.
- INCOMPAS [met separately with](#) Legal Advisors to Commissioners Rosenworcel and Clyburn on November 27 and 28, 2017, to state that the draft Restoring Internet Freedom Order is a significant departure from almost two decades of bipartisan agreement concerning net neutrality. It also claimed the FCC will have no adequate rules to protect and promote the open internet, and it will have relinquished its ability to enforce net neutrality by finding that the authority it has been granted by Congress is inapplicable.
- The Computer & Communications Industry Association [met separately with](#) Legal Advisors to Commissioners Rosenworcel, O’Rielly, Carr, and Clyburn on November 28 and 29, 2017, to express concern with the fate of the internet ecosystem if the FCC adopts Chairman Pai’s proposed Restoring Internet Freedom Order. CCIAC claimed the FTC is not capable of stepping into the void that the FCC is set to leave regarding oversight of BIAS provider practices. CCIAC asserted differences in the FTC’s

enforcement will create suboptimal results for the internet ecosystem, and said it is unclear how the FTC would enforce against discrimination on communications networks.

- Akamai Technologies sent a [letter](#) to Chairman Pai and Commissioners Clyburn, Carr, O’Rielly, and Rosenworcel on November 30, 2017, to suggest additions to a footnote in the draft Restoring Internet Freedom Order to clarify that content deliver network services differ from paid prioritization. Akamai explained that removing any confusion between localization and prioritization is important because the Commission’s use of these terms could have global regulatory implications.
- The California Association of School Business Officials sent a [letter](#) to Chairman Pai on November 30, 2017, to urge the Commission to maintain the existing open internet rules and focus on policies that lower the barriers to the deployment of new networks.
- The Writers Guild of America East filed [comments](#) on November 30, 2017, on the proposal to roll back the current open internet rules. It said the principles of net neutrality, including the no-blocking and nondiscrimination rules and restrictions on fast-lane pricing and preferences, have served to restrain the enormously powerful and profitable media, telecommunications, and technology giants that would otherwise rule the internet. It urged the Commission to rescind the Declaratory Ruling, Report and Order, and Order, and leave the existing rules governing an open internet in place in their entirety.

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USF Reform

- The FCC issued a [Notice](#) in the Federal Register on December 4, 2017, announcing OMB approval of the information collection requirements adopted in the March 2016 Rate-of-Return USF Reform [Order](#) for a period of three years (from September 20, 2016, through September 30, 2019). The reforms adopted in the Order required RoR LECs to make tariff filings with the necessary tariff materials outside of the normal tariff filing period. The amendments to sections 51.917(f)(4) (revenue recovery for RoR carriers), 69.4(k) (charges to be filed), 69.132 (end user Consumer Broadband-Only Loop charge for non-price cap ILECs), 69.311 (Consumer Broadband-Only Loop investment), and 69.416 (Consumer Broadband-Only Loop expenses) are effective December 4, 2017.
- NTCA [spoke with](#) Chairman Pai’s Advisor on November 29, 2017, to reiterate the need to remedy shortfalls in high-cost USF support for the model-based and cost-based USF programs. NTCA urged 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 help address some of the shortfalls pending further examination of the program budget and consideration of additional measures to promote longer-term predictability and sufficiency.
- USTelecom [met with](#) Commissioner O’Rielly’s Legal Advisor on November 28, 2017, to express 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. USTelecom discussed how the insufficiency of funding has effected broadband providers’ ability to build out fiber to rural areas and data showing the decline in capital investment in broadband over the last two years.
- Seven Georgia RLECs who have accepted A-CAM support filed [a letter](#) on November 28, 2017, to urge 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. They said the mechanism to distribute additional funds 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. Twenty-eight [Minnesota RLECs](#), six [Oklahoma RLECs](#), five [Washington RLECs](#), [Thirty Wisconsin RLECs](#), and [three Arizona RLECs](#) filed similar letters between November 28, and December 1, 2017.
- Reply comments were filed on November 29, 2017, on the parameters and procedures to implement the MF-II challenge process. [NTCA](#) said commenters agreed some of the proposals would prove unnecessarily burdensome for small providers to participate in this process to identify areas eligible for

support. It suggested the Commission: better define what qualifies as a “readily available handset model” under its testing procedures; set an upper limit on the per-device cost of a readily available handset model, regardless of operating system; and require that handsets identified as appropriate for testing not be subject to any network management practices that could or would undermine the value of the data they are used to collect. The [Rural Wireless Association](#) urged the Bureaus to: ensure the challenge process timeline does not impede participation; create an exception for rural areas to the one square mile grid to determine challenge areas; modify the data speed throttling proposal to allow the challenger and challenged carriers to coordinate this issue before the speed test data is recorded; require service providers to identify a variety of handset models appropriate for testing coverage; not require challengers to submit extraneous data parameters when download speeds are the only factor in determining an area’s MF-II funding eligibility; and clarify that a qualified engineer may work directly for an operator or a vendor on behalf of an eligible challenger. [Verizon](#) said the Bureaus should improve the challenge process by: requiring challengers to report information about the server used for speed testing; clarifying that respondents may submit technical data without using the proposed templates; and requiring challengers to conduct all speed tests using devices that are not subject to reduced speed under the terms of the challenger’s service plan. Verizon asserted the Bureaus do not have the authority to adopt CCA’s proposal to reimburse challengers for the costs of mounting a successful challenge, nor to adopt RWA’s proposal that unsubsidized carriers remove usage limits from the devices that challengers use for speed testing, and should not adopt NTCA’s proposal to further delay the start of the challenge window. [U.S. Cellular](#) agreed with commenters that certain proposals in the [Public Notice](#) concerning speed testing performed by challengers, the use of grid cells and buffers, and the challenge process timeline should be modified or rejected to avoid saddling challengers, many of whom are likely to be smaller rural carriers, with burdens that will encumber their efforts and prevent the challenge process from producing accurate findings regarding areas that are eligible for MF-II support. [CCA](#) also filed reply comments. [Public Notice \(attachment\)](#)

- The Alaska Telephone Association filed [PRA comments](#) on November 27, 2017, on the collection of middle mile information from Alaska Plan participants. It said the proposed information collection does not meet the requirements of the PRA because it is unnecessarily broad, as it requires the reporting of extensive last-mile facilities. It also claimed the information is not “necessary” as the PRA requires, nor does it reflect an effort to “reduce[] to the extent practicable and appropriate the burden” of the collection, as the accuracy requirements are so granular as to require manual surveys in many cases.

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ICC

- The Wireline Competition Bureau issued a [Public Notice](#) on November 29, 2017, seeking comment on Venture Communications’ Petition for Waiver of sections 51.909(a), 51.917(b)(1), and 51.917(b)(7) to implement its planned January 1, 2018, merger of two commonly-owned and merged study areas in the same state. Comments are due December 19, 2017; reply comments are due January 3, 2018.

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Broadband

- The FCC released the [Report and Order, Declaratory Ruling, and FNPRM](#) on November 30, 2017, that was adopted at its November 16, 2017 Open Meeting on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. Comments are due January 17, 2018; replies due February 16, 2018.
- Chairman Pai [spoke](#) at Project GOAL’s Conference on “Aging and Technology: Creating Opportunities to Age Well With Innovation.” Pai said compared to the overall population, older adults’ internet usage is 23 percentage points lower, home subscriptions are 22 points lower, and smartphone adoption is 35 points lower. He said the revamped Mobility Fund will invest \$4.53 billion over the next decade to bring 4G LTE service to rural Americans who do not have it today, and the CAF will direct \$2 billion to boost

fixed broadband in currently unserved locations. He also discussed the Open Internet and Rural Health Care items that will be voted on at the FCC's December Open Meeting, and discussed steps the FCC has taken to address unlawful robocallers.

- Commissioner Clyburn [spoke](#) at the Connect South Carolina Community Technology Action Plan Event in South Carolina on November 27, 2017. She said one of the most important tools at the FCC when it comes to bringing affordable broadband to the nation is the Universal Service program, and the FCC is moving towards finalizing another CAF Phase II Auction that it hopes to hold in 2018 and the Mobility Fund Phase II Auction that would follow close behind. She also said the FCC's latest efforts to reform the Lifeline Program will actually decrease the availability of service for those who stand to benefit the most.
- NRECA filed a [letter](#) on November 28, 2017, attaching a copy of its reply comments in the wireline and wireless infrastructure deployment proceedings. NRECA said its reply comments focused on 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 claimed one specific impediment to broadband deployment is restrictive state laws that limit market entry for non-governmental entities, such as electric coops, and urged the FCC to discourage such state laws.
- Google Fiber filed a [letter](#) on November 30, 2017, to express concerns with calls for broad, open-ended indemnification by attachers that elect to use OTMR. It suggested the FCC ensure that any new rules adopting OTMR require entities electing to use OTMR to bear the direct cost of damage to or destruction of facilities, but not impose any obligations to indemnify existing attachers for third-party claims.

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Universal Service

- The FCC released the Lifeline [Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, NPRM and NOI](#) on December 1, 2017, that was adopted at its November 16, 2017 Open Meeting, on measures to bridge the digital divide for Lifeline subscribers and reduce waste, fraud, and abuse in the Lifeline program. Comments are due January 24, 2018; replies are due February 23, 2018.
- The Wireline Competition Bureau issued a [Public Notice](#) on December 1, 2017, announcing the launch of the National Lifeline Eligibility Verifier will be postponed until early 2018. Originally scheduled for six initial states in December 2017, the Bureau said USAC informed it the National Verifier's systems have unresolved potential vulnerabilities that have not yet been addressed under the Federal Information Security Management Act of 2002, which could impact the security of personal subscriber information. [News Release](#)
- WTA filed [comments](#) on November 27, 2017, supporting NTCA's [Petition](#) for a temporary waiver of the updated minimum service standards applicable to fixed, wireline broadband access service eligible for Lifeline support. WTA said raising the minimum standards in the Lifeline program would result in increased prices and decreased Lifeline subscribership, and granting the Petition will ensure that no Lifeline customer is forced to lose his or her service because it is no longer affordable. Replies are due December 12, 2017. [Public Notice](#)
- The Commission placed an item [on circulation](#) on November 21, 2017, on Blanca Telephone Company's request for relief from the Office of the Managing Director's June 22, 2016 letter demanding repayment of a USF debt pursuant to the Debt Collection Improvement Act.
- USAC filed the [Federal Universal Service Support Mechanism Quarterly Contribution Base](#) for First Quarter 2018 on November 30, 2017. 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 2018 is \$12,871,991,125, down from \$13,025,590,609 in the previous quarter.

- The Wireline Competition Bureau released a [Public Notice](#) on November 30, 2017, granting, denying, and dismissing various petitions related to actions taken by USAC on the E-rate program 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 released an [Order](#) on November 27, 2017, granting in part the New York State PSC's motion seeking an extension of the waiver previously granted to implement Lifeline federal eligibility program changes. The Bureau said good cause exists to extend the waiver through April 30, 2018, or the date on which the NYPSC has aligned its eligibility criteria with the Commission's rules and updated its eligibility database accordingly.
- The Michigan PSC filed a [letter](#) on November 30, 2017, asking the FCC for a 12 month extension of the previously-granted [waiver](#) of effective dates of certain Lifeline rules, until December 31, 2018. The MPSC said the Lifeline program for Michigan is different than the eligibility requirements of the FCC's Order for federal reimbursement, and the differences in state and federal eligibility criteria may create confusion for both Lifeline customers as well as Michigan designated ETCs.
- The Bristol Bay Area Health Corporation filed a [letter](#) on November 27, 2017, to express support for Alaska Communications' [proposal](#) to address what it claims is an immediate crisis facing rural health care providers that submitted timely funding requests to USAC for eligible services under the FCC's Rural Health Care program. BBAHC said ACS' proposal provides a path to ensure adequate funding of eligible services in FY 2017 and beyond, and suggested the Commission take immediate action to address the current crisis in RHC support.

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Misc.

- The Wireline Competition Bureau issued a [Public Notice](#) on November 29, 2017, announcing comments are due December 27, 2017, 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. The NPRM and NOI were published in the [Federal Register](#) on November 27, 2017. Replies are due January 26, 2018.
- The FCC published in the [Federal Register](#) on December 1, 2017, the [Report and Order](#) allowing law enforcement authorities under specific circumstances to access blocked caller ID information when needed to identify and thwart threatening callers. The Order is effective January 2, 2018, except for sections 64.1601(d)(4)(ii) and (f), which contain new or modified information collection requirements that require review by the Office of Management and Budget.
- The Wireline Competition Bureau issued a [Public Notice](#) on November 29, 2017, seeking comment on Champaign Telephone Company's [Petition for Waiver](#) of the requirement adopted in the 1980s' cost separation proceeding that "investments once allocated to nonregulated use may not be reallocated to regulated use," consistent with the waiver process contemplated at that time. CTC asserted by granting this waiver, it would be allowed to return its loop investment to regulated costs, which will bring CTC into compliance with the Commission's cost separations requirements and will be consistent with the 2016 Rate-of-Return Reform Order. Comments are due December 19, 2017; replies due January 3, 2018.
- ZipDX [spoke with](#) the FCC's Chief Technology Officer on November 28, 2017, to discuss the potential effectiveness of the draft Robocall Order and the risk of blocking legitimate calls. ZipDX reviewed earlier recommendations regarding how affected callers should be informed that they have been blocked, and stressed the importance of moving forward with a next phase of illegal robocall mitigation

that focuses on stopping the calls at their source, including near-term efforts to make spoofed calls traceable as a prelude to the longer-term deployment of STIR/SHAKEN.

- The FCC filed a [brief](#) in the Eighth Circuit Court on November 17, 2017, in the case reviewing the FCC's Business Data Services [Order](#). The FCC argued it gave ample notice for its BDS rules, and said in excluding legacy transport services from ex ante pricing regulation, it made a reasonable assessment of the record and appropriately balanced the relative risks of under- and over-regulation. The FCC also asserted it reasonably concluded ex ante pricing regulation is not necessary for lower bandwidth legacy termination services except where the agency's competitive market test predicts that competition and the backstop of the Commission's fast-track complaint process will not adequately ensure just and reasonable rates and terms.
- The FCC published a [Notice](#) in the Federal Register on November 29, 2017, announcing OMB approval of an information collection associated with the Business Data Services [Order](#). The amendments to sections 1.776 and 69.701 are effective November 29, 2017.
- CTIA filed [comments](#) on December 1, 2017, on the [FNPRM](#) on the appropriate tiers for calculating terrestrial and satellite international bearer circuit fees, the methodology for calculating cable TV subscribers in multiple dwelling units, and proposing to adopt a regulatory fee for all holders of section 214 international authorizations. CTIA urged the Commission to reject the Submarine Cable Coalition's proposal to replace IBC regulatory fees with a new regulatory fee based on section 214s. CTIA claimed attempts to reform the IBC regulatory fee methodology should not result in placing additional, unnecessary burdens on operators that have no U.S.-international circuits or submarine cables. Replies are due December 18, 2017. [Public Notice](#)
- The North American Portability Management filed a [letter](#) on November 30, 2017, to provide a summary of the NAPM's status updates to the FCC on the transition of the current LNPA, Neustar, to the new LNPA, Telcordia d/b/a/ iconectiv. NAPM said it will continue to file updates of this report with the FCC at the end of each month until the transition is complete.
- The FCC [announced](#) on November 27, 2017, the appointment of Barbara Esbin as Deputy Chief of the Consumer and Governmental Affairs Bureau. Ms. Esbin will focus on overseeing the Bureau's Office of Native Affairs and Policy and its Office of Intergovernmental Affairs.

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Upcoming Filing Dates

- 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 - Comments due on Champaign Telephone Company's [Petition for Waiver](#) of the requirement that "investments once allocated to nonregulated use may not be reallocated to regulated use," consistent with the waiver process contemplated at that time. Replies due January 3, 2018. [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. 19 - Comments due on Venture Communications' Petition for Waiver of sections 51.909(a), 51.917(b)(1), and 51.917(b)(7) to implement its planned January 1, 2018 merger of two commonly-owned and merged study areas in the same state. Replies due January 3, 2018. [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. 3 - Replies due on Champaign Telephone Company's [Petition for Waiver](#) of the requirement that "investments once allocated to nonregulated use may not be reallocated to regulated use," consistent with the waiver process contemplated at that time. [Public Notice](#)

- Jan. 3 - Replies due on Venture Communications' Petition for Waiver of sections 51.909(a), 51.917(b)(1), and 51.917(b)(7) to implement its planned January 1, 2018 merger of two commonly-owned and merged study areas in the same state. [Public 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](#)
- Jan. 17 - Comments due on the [FNPRM](#) on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes. Replies due February 16, 2018.
- 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. 24 - Comments due on the NPRM and NOI portion of the Lifeline [Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, NPRM and NOI](#). Replies are due February 23, 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. 16 - Replies due on the [FNPRM](#) on further changes to the pole attachment rules, network change disclosure processes, and section 214(a) discontinuance processes.
- 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.
- Feb. 23 - Replies due on the NPRM and NOI portion of the Lifeline [Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, NPRM and NOI](#).

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