December 9, 2019 HIGHLIGHTS

- The FCC issued the agenda for its December 12, 2019, Open Meeting. The FCC will consider nine items, including an order on remand and declaratory ruling clarifying that a local exchange carrier partnering with a VoIP provider may assess end office switched access charges only if the carrier or its VoIP partner provides a physical connection to the last-mile facilities used to serve the end user.

- The FCC announced the 2020 reasonable comparability benchmarks for fixed voice and broadband services, posting of urban rate survey data and explanatory notes on the data, and the required minimum usage allowance for ETCs.

- The October 2019 order on reconsideration on CAF testing procedures and performance measures is effective January 8, 2020. The FCC also issued an erratum to the order on reconsideration, making minor corrections to paragraph (2) under section 54.320(d) (compliance and recordkeeping).

- The Wireline Competition Bureau granted seven petitions for waiver of the March 1, 2018 deadline to upload and certify geocoded location information data with USAC through the HUBB portal.

- Chairman Pai announced he intends to establish the 5G Fund, which would make up to $9 billion in USF support available to carriers to deploy advanced 5G mobile wireless services in rural America. This new fund would replace the planned Mobility Fund Phase II. The FCC issued a report that found the 4G LTE coverage data is not sufficiently reliable for the purpose of moving forward with MF II.

- NTCA offered suggestions on the Rural Digital Opportunity Fund. USTelecom, AT&T, et al. also discussed the RDOF.

- Comments were filed on the effectiveness of the FCC’s 2012 tribal engagement further guidance. Replies are due January 6, 2020.

- The USDA announced it is providing $6 million to expand high-speed broadband infrastructure in Oregon, $18.88 million in Yakutat, Alaska, $12.8 million in Illinois, and $62.3 million in Alabama. The funding is through the USDA’s ReConnect pilot program.

- The Wireline Competition Bureau approved NECA’s 2020 modifications of average schedule high cost loop support formulas for the period beginning January 1, 2020, through December 31, 2020.


- The House Subcommittee on Communications and Technology held a hearing on FCC oversight. Witnesses included Chairman Pai and Commissioners Carr, O’Rielly, Rosenworcel and Starks.

- The FCC announced the chairs and vice chairs of the four working groups for precision agriculture connectivity task force.

Other Key Upcoming Dates

- Jan. 6 - Replies due on the effectiveness of the 2012 tribal engagement further guidance, steps to assist parties with their engagement efforts, and on pending petitions for reconsideration.
USF Reform

- The Wireline Competition Bureau and the Office of Economics and Analytics issued a public notice on December 5, 2019, announcing the 2020 reasonable comparability benchmarks for fixed voice and broadband services for ETCs subject to broadband public interest obligations, including rate-of-return carriers, incumbent price-cap carriers receiving CAF Phase II support, RBE providers, and CAF Phase II Auction winners. The Bureau and OEA also announced the posting of the fixed voice and broadband services data collected in the most recent urban rate survey, and explanatory notes regarding the data, on the Commission's website, as well as the required minimum usage allowance for ETCs subject to public interest obligations for fixed broadband. The 2020 rates are as follows: local voice service is $34.81; reasonable comparability benchmark for voice services is $54.76; and reasonable comparability benchmarks for broadband range from $73.81 for 4/1 Mbps (250 GB usage allowance) and $158.82 for 1000/100 Mbps (unlimited usage). The benchmarks for Alaska Plan carriers are higher. ETCs providing fixed voice and broadband services must certify they meet the benchmarks in the FCC Form 481 filed no later than July 1, 2020.

- The October 2019 order on reconsideration on CAF testing procedures and performance measures was published in the Federal Register on December 9, 2019. The order addressed several petitions for reconsideration and applications for review of the 2018 Performance Measures Order and provides flexibility for smaller carriers by making targeted modifications to the testing procedures carriers must use to show their networks perform at the Commission's speed and latency standards. The order is effective January 8, 2020.

- The FCC issued an erratum on December 4, 2019, to the order on reconsideration on performance testing. The erratum corrected paragraph (2) under section 54.320(d) (compliance and recordkeeping for the high-cost program), in appendix A of the order.

- The Wireline Competition Bureau issued an order on December 2, 2019, granting seven petitions for waiver of the March 1, 2018 deadline to upload and certify geocoded location information data with USAC through the High Cost Universal Broadband portal. The Bureau said the waivers are warranted because the petitioners all describe confusion with new HUBB filing requirements and agreed that there may have been technical difficulties with accessing or certifying information in the newly deployed HUBB. The Bureau said it expects that, after this initial reporting and certification deadline, ETCs are familiar with their reporting requirements and the HUBB interface, and said it is unlikely to grant future petitions with similar facts.

- Chairman Pai announced on December 4, 2019, he intends to establish the 5G Fund, which would make up to $9 billion in USF support available to carriers to deploy advanced 5G mobile wireless services in rural America. This new fund would replace the planned Mobility Fund Phase II, which would have provided federal support for 4G LTE service in unserved areas. Pai said this investment would be allocated through a reverse auction and would target hard-to-serve areas with sparse populations and/or rugged terrain. Pai said this new fund would set aside at least $1 billion specifically for deployments facilitating precision agriculture needs. The FCC also issued a report on December 4, 2019, in which Commission staff found the 4G LTE coverage data submitted by providers is not sufficiently reliable for the purpose of moving forward with MF II. The report recommended the FCC terminate the challenge process, audit the coverage filings of carriers in other proceedings before the FCC, and take additional steps to make sure that coverage data is accurate.

- Vantage Point Solutions met with Wireline Competition Bureau staff on December 2, 2019, to discuss a recent analysis it performed on actual broadband customer traffic. VPS asserted this analysis provides insights into the level of cross-talk, speed, and capacity present on customer broadband services today. It also discussed the FCC’s acceptable location of the customer and IXP testing endpoints, as required by the Commission’s recent order on reconsideration regarding performance testing. VPS asked the FCC to consider alternative solutions that would result in more accurate performance testing results, such as adding the cross-talk measurement to the performance test measurement. VPS also
discussed the difficulties associated with verifying that a specific test server is in the same building as an acceptable autonomous systems number.

- NTCA met with Chairman Pai’s rural broadband advisor on December 3, 2019, to discuss the Rural Digital Opportunity Fund. NTCA asserted the current weighting proposals for the RDOF will fall short of achieving reasonable comparability, and suggested the FCC promote the deployment of the most capable services possible in the initial rounds of the RDOF auction, and then to turn to a Remote Areas program to address those areas still remaining unserved thereafter. NTCA discussed its RDOF weighting proposals, urged the FCC to recognize the benefits conferred by services providing symmetrical upload and download speeds through the adoption of a 15 point symmetrical bonus, and discussed the need for more forward-looking usage limitations than those proposed. NTCA also discussed steps the FCC should take to ensure greater accountability in the use of RDOF distributions, and the significance of reasonable transitions between universal service support mechanisms. NTCA also met with Commissioner Carr’s legal advisor on December 4, 2019, to discuss the same issues.

- NTCA met with Commissioner O’Rielly and his legal advisor on December 4, 2019, to discuss the Rural Digital Opportunity Fund. NTCA discussed the weighting needed to recognize the values of relative speeds and symmetrical services in the RDOF auction, and the importance of greater accountability both prior to bids and following awards. NTCA also discussed the need for carefully planned transitions from prior support mechanisms to RDOF and other auction support, particularly where a provider has outperformed expectations and surpassed prior buildout obligations.

- USTelecom, AT&T, CenturyLink, Consolidated, Frontier, Verizon and Windstream met with Wireline Competition Bureau and Rural Broadband Auctions Task Force staff on November 26, 2019, to discuss USTelecom’s comments on the Rural Digital Opportunity Fund. They discussed transition issues, offered a proposal modifying the Commission’s letter of credit requirement, and urged the Commission to conduct the auction based upon the best available data set. They requested the FCC work with the vendor of the Connect America Cost Model to update the location counts underlying the model as the counts are based on 2011 data that has changed since then. They also asked the FCC to consider adjusting its proposal for speed tiers.

- The California Public Utilities spoke with Wireline Competition Bureau staff on December 3, 2019, regarding the Rural Digital Opportunity Fund. CPUC staff discussed the benefits of a federal-state partnership for USF programs, and the desire of the CPUC to leverage California Advanced Service Fund dollars with the federal program to make cost-effective use of both federal and state ratepayer dollars. CPUC said it offered to engage with all other states that commented in the RDOF and CAF proceeding to develop federal-state partnership options in order to best leverage both federal and state expenditures for broadband infrastructure supporting underserved and unserved communities.

- The National Rural Electric Cooperative Association filed a letter on December 5, 2019, to address proposals by CenturyLink and ITTA that electric cooperatives comply with the Commission’s pole attachment regulations as a condition to participating in the Phase 1 auction of the RDOF. NRECA asserted the proposed condition is outside the scope of this proceeding, and the NPRM addresses the proposed Phase 1 auction without even mentioning pole attachments or pole attachment regulation. NRECA also responded to NCTA and AT&T on pole attachments rates. NRECA asserted the notion that cooperative pole attachment rates impair broadband deployment is not credible.

- WISPA filed a letter on December 2, 2019, to respond to the Fiber Broadband Association’s letter on the performance tier weighting issues raised in WISPA’s comments and reply comments on the Rural Digital Opportunity Fund. WISPA asserted FBA does not substantiate FBA’s consultant’s analysis or resulting weights, but instead cites deployment statistics. WISPA claimed these statistics do not, however, provide any additional evidence supporting the FBA analysis or it proposed weights.

- The Fiber Broadband Association sent a letter to Chairman Pai on December 5, 2019, on his announcement of a new universal service fund to bring 5G mobile wireless connectivity to hard-to-serve areas. FBA asserted Pai’s announcement of the new 5G Fund highlights the need to ensure that in adopting rules for the RDOF, the Commission also takes a forward-looking view and supports networks that will be fundamental communications infrastructure for the future.
The Fiber Broadband Association filed a letter on December 5, 2019, addressing WISPA’s December 2, 2019, ex parte, which responded to FBA’s letter on the performance tier weighting issues raised in WISPA’s comments on the Rural Digital Opportunity Fund. FBA said it sees no need to comment further on the arguments WISPA makes regarding issues under consideration in the RDOF and stands by its November 14, 2019 letter.

Comments were filed on December 5, 2019, on the effectiveness of the FCC’s 2012 tribal engagement further guidance, steps the FCC can take to assist parties with their engagement efforts, and refreshing the record on pending petitions for reconsideration that were filed on the tribal engagement obligation reporting. USTelecom said the legal arguments it raised about the tribal engagement rule in its previously-filed petitions for reconsideration remain valid. It also asserted the Commission should clarify that only ETCs that actually receive and spend high-cost support to deploy and maintain facilities to serve Tribal lands must comply with this rule. NTTA recommended the Commission adopt a set of best practices for ETCs receiving support, enact serious and consistent enforcement with the rules, and adopt a penalty structure to be applied in the event of noncompliance. Sacred Wind Communications recommended the FCC maintain tribal engagement requirements for all service providers receiving high-cost federal support to serve tribal communities, but enhance its tribal engagement guidelines to further encourage two-way communications between ETCs and Tribes. Gila River Telecommunications suggested the Commission: improve broadband availability data to better target resources; make clear that it intends to take a more robust approach to enforcing the existing obligations for tribal engagement; convene a voluntary process to determine what course of action is mutually agreeable to the parties to get broadband to a tribal area where an ETC determines it is not able to deploy broadband for the foreseeable future; and elevate the Office of Native Affairs and Policy to a separate office within the Commission’s organizational chart. The Alaska Rural Coalition urged the Commission to consider the unique challenges facing Alaska carriers and not narrowly tailor the tribal engagement guidance to traditional tribal structure most often found on reservations in the lower 48 states. public notice. Replies are due January 6, 2020. all comments available

ICC

CenturyLink spoke with legal advisors to Commissioners Carr, Starks, Rosenworcel, and O’Rielly on December 2, 2019, regarding the draft order on remand and declaratory ruling on the VoIP symmetry rule. CenturyLink asserted the Transformation Order made clear that the Commission believed in 2011 it was adopting a rule that did not provide different compensation for over-the-top and facilities-based VoIP, and said the draft order cannot be reconciled with the way the Transformation Order implemented the VoIP-PSTN framework, including the safe harbor the Commission adopted. CenturyLink urged the Commission to reject the draft Order and instead grant CenturyLink’s petition.

Teliax filed a letter on December 4, 2019, on the draft order on remand and declaratory ruling on the VoIP symmetry rule. Teliax asserted the draft order should be removed from consideration at the December 12, 2019 Open Meeting because it errs by failing to address important issues. Teliax asserted the FCC should address these issues and make proposed determinations, claiming the alternative is a likely rejection of any final order by the court of appeals. Teliax claimed in the event the FCC concludes tandem switching, rather than end office switching is applicable, the Commission should clarify that OTT VoIP providers and their CLEC partners are permitted to recover tandem switching charges every time switching is performed.

Verizon met with advisors to Commissioners Rosenworcel and O’Rielly on December 3, 2019, to discuss the draft order on remand and declaratory ruling on the VoIP symmetry rule. Verizon expressed support for the conclusion that the VoIP symmetry rule permits LECs to assess end office switched access charges only if the LEC or its VoIP partner provides a physical connection to the last-mile facilities used to serve an end user, and supports the finding that this ruling should have retroactive effect. Verizon suggested an edit to footnote 64 in the draft order, claiming the modified language would emphasize that LEC-VoIP partnerships may assess charges for non-end office access
services only if they provide the functional equivalent of such services. Verizon also met with Chairman Pai’s advisor on December 5, 2019, to discuss the same issues.

- Bandwidth filed a letter on December 5, 2019, to respond to Verizon’s letter that suggested a revision to footnote 64 in the draft order on remand and declaratory ruling on the VoIP symmetry rule. Bandwidth said, if as the draft order indicates, the Commission intends to reverse the 2015 declaratory ruling, Bandwidth expressed support for Verizon’s request to ensure the Commission make clear that the tandem-switched transport functions provided in originating and terminating calls to “over-the-top” VoIP customers are compensable as tandem switching and transport services in accordance with LEC switched access tariffs.

Back to Highlights

Broadband

- The FCC issued a public notice and news release on December 6, 2019, announcing Chairman Pai appointed chairs and vice chairs to lead the four working groups for precision agriculture connectivity task force. The chairs and vice chairs of these working groups, along with the chair and vice chair of the task force are listed in the attachment to the public notice. The FCC said full membership of the working groups will be announced at a later date.

- The FCC issued a public notice on December 6, 2019, extending the deadline to submit nominations for membership to the Intergovernmental Advisory Committee. The deadline for submission of nominations to the next term of the IAC will be extended until January 13, 2020. The mission of the IAC is to provide advice to the Commission on telecommunications issues affecting local, state and tribal governments, including broadband adoption and deployment.

- The USDA announced on December 3, 2019, it is providing $6 million to expand high-speed broadband infrastructure that will provide e-connectivity for nearly 650 new customers in Wheeler and Grant counties, Oregon. The USDA said Oregon Telephone will use this funding to deploy 89 miles of fiber, providing network speeds ranging from 30 Mbps to 1 Gbps. The USDA also announced it invested $18.88 million in Yakutat, Alaska, $12.8 million in rural Illinois, and $62.3 million in rural Alabama. The funding is through the USDA’s ReConnect pilot program.

- Replies are due December 9, 2019, on the 15th Broadband Deployment Report Notice of Inquiry that initiates the next annual assessment of the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion.

- The Managing Director issued an order on December 6, 2019, making non-substantive revisions to parts 1, 20, and 43 of the Commission’s rules by eliminating a redundant and obsolete provision and revising other related provisions of the Commission’s rules for consistency, in conformance with the report and order that established the Digital Opportunity Data Collection.

- NATOA met with legal advisors to Commissioners Rosenworcel, Carr, and Starks, and Wireless Telecommunications Bureau and Wireline Competition Bureau staff on December 4, 2019, to discuss WIA’s petitions for rulemaking and declaratory ruling regarding section 6409(a) of the Spectrum Act of 2012, and CTIA’s petition for declaratory ruling regarding section 6409 and the rules implementing section 224 of the Communications Act. NATOA discussed concerns with the proposals in the petitions consistent with its comments and reply comments. NATOA claimed the requested changes are such that the Administrative Procedures Act requires a rulemaking process.

- The Wireless Telecommunications Bureau issued a public notice on December 2, 2019, announcing the rural tribal priority window will open on February 3, 2020, and will close on August 3, 2020. The Bureau said the FCC established a website that provides access to information regarding the window, including the location and dates of outreach and education opportunities, and a mapping tool to assist tribes in assessing their eligibility and the amount of unassigned 2.5 GHz spectrum over their Rural
Tribal Lands. The FCC will host a workshop at its headquarters on January 14, 2020. In July 2019, the Commission established the rural tribal priority window.

Robocalls

- The House passed the Pallone-Thune TRACED Act on December 4, 2019. The bill, among other things, requires: carriers to offer call-authentication technology to everyone at no additional charge; opt-in or opt-out robocall blocking be offered at no additional charge to consumers; gives the FCC the ability to step up enforcement actions against unlawful robocalls with a longer statute of limitations and increased fines in certain cases; and helps the FCC and responsible carriers traceback and cutoff suspect phone companies that are responsible for sending vast numbers of unlawful robocalls. [summary of bill].

- The Senate Committee on Commerce, Science and Transportation will meet on December 11, 2019, to markup 13 bills, including: S. 2204, Data Analytics Robocall Technology Act; S. 2363, Telecommunications Opportunities for Workers Engaging in Real (TOWER) Infrastructure Deployment Act; S. 2881, 5G Spectrum Act; and S. 2661, National Suicide Hotline Designation Act.

Universal Service

- The Wireline Competition Bureau released an order on December 6, 2019, approving NECA’s 2020 modifications of average schedule high cost loop support formulas for the period beginning January 1, 2020, through December 31, 2020.

- USAC filed the Federal Universal Service Support Mechanisms Quarterly Contribution Base for first quarter 2020 on December 2, 2019. 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 2020 is $11,129,976,956, up from $11,017,439,561 in the previous quarter.

- The FCC issued a report and order on December 3, 2019, making permanent the E-Rate category two budget approach it adopted in 2014 to fund internal connections. The Commission also simplified and streamlined the category two budget approach to allow applicants to make more effective use of category two funding, and decreased the administrative burden of applying for category two services.

- The FCC released a public notice on April 29, 2019, announcing petitions for reconsideration of the August 2019 rural health care order have been filed by USTelecom, the state of Alaska, Alaska Communications, the SHLB Coalition, and the North Carolina Telehealth Network Association and Southern Ohio Health Care Network. Oppositions to the petitions will be due 15 days after this public notice is published in the Federal Register, and replies to oppositions will be due 10 days after the time for filing oppositions has expired.

- The SHLB Coalition met with Chairman Pai’s advisor on November 26, 2019, to discuss its petition for reconsideration and clarification of the rural health care report and order. SHLB asserted rural health care consortia that participate in the Healthcare Connect Fund are likely to bear the brunt of any reductions in funding if the total demand exceeds the funding cap and that applicants in the Healthcare Connect Fund and the Telecommunications Program should be treated equally. SHLB also claimed USAC does not currently have the expertise to engage in rate-setting for the Telecommunications Program and urged the Commission to provide USAC with additional resources to engage in this work.
Misc.

- The FCC issued the agenda on December 5, 2019, for its December 12, 2019, Open Meeting. The FCC will consider an order on remand and declaratory ruling that would promote continued investment in IP-based networks by clarifying that a local exchange carrier partnering with a VoIP provider may assess end office switched access charges only if the carrier or its VoIP partner provides a physical connection to the last-mile facilities used to serve the end user. The FCC will also consider: an NPRM that would propose to designate 988 as the 3-digit number for a national suicide prevention and mental health crisis hotline; an NPRM that would take a comprehensive look at the rules for the 5.9 GHz band and propose, among other things, to make the lower 45 MHz of the band available for unlicensed operations and to permit Cellular Vehicle to Everything (C-V2X) operations in the upper 20 megahertz of the band; an NPRM on removing the existing non-federal allocations in the 3.3-3.55 GHz band as a step towards potential future shared use between federal incumbents and commercial users; an NPRM on modernizing requirements for notices cable operators must provide consumers and local franchise authorities; a report and order that would revise the Commission’s Noncommercial Educational Broadcast Station and Low Power FM Station comparative processing and licensing rules; and three enforcement actions.

- The House Subcommittee on Communications and Technology of the Committee on Energy and Commerce held a hearing on December 5, 2019, on FCC oversight. Witnesses included Chairman Pai and Commissioners Carr, O’Rielly, Rosenworcel and Starks. Pai discussed items the FCC will consider at the December 2019 Open Meeting, and items the FCC recently adopted, including the supply chain order and 911 order. O’Rielly discussed spectrum; Rosenworcel discussed the T-Mobile-Sprint merger, public safety, 5G security, and closing the homework gap; Starks discussed internet inequality, improving the USF programs, network security and 5G; and Carr discussed 5G and telehealth.

- Huawei Technologies filed a petition for review of the Commission’s supply chain order with the U.S. Court of Appeals for the Fifth Circuit on December 5, 2019. Huawei asked the Court to hold that the order is unlawful and to vacate it.

- Comments were filed on December 6, 2019, on the FNPRM on proposals to amend the FCC’s schedule of regulatory fees for FY 2020. CenturyLink suggested the FCC reallocate many costs currently recovered from international bearer circuits to be indirect costs. It also suggested the Commission rebalance the distribution of fees paid by IBCs among the three types of IBC payors. The Satellite Industry Association urged the FCC to eliminate the satellite IBC fee and reassess the appropriate split between space station and earth station regulatory fees, and reform other aspects of the fee framework and make regulatory fee information more accessible. Comments were also filed by Maranatha Broadcasting Company and PMCM TV. Reply comments are due January 6, 2020. order

- No comments were filed on a section 214 application filed by Charles W. Crow, Ruth Ann Crow, and David R. Crow (transferors) and New Florence Telephone, requesting consent to transfer control of Farber Telephone from transferors to New Florence. Reply comments are due December 11, 2019. public notice

- The FCC issued a Small Entity Compliance Guide on December 3, 2019, on the August 2019 public notice that adopted procedures for the auction of certain toll-free numbers in the 833 code. The guide is designed to help individuals and small businesses understand the requirements and other procedures for the auction and provides information on compliance requirements, record keeping and reporting requirements and the implementation date.

- The August 2019 report and order on calls to 911 made from multi-line telephone systems was published in the Federal Register on December 5, 2019. The order is effective January 6, 2020. Compliance will not be required for certain Part 9 rules until the Commission publishes a document in the Federal Register announcing the compliance date. The Public Safety and Homeland Security Bureau issued a public notice on December 5, 2019, to announce the August 2019 report and order effective date.
The Public Safety and Homeland Security Bureau and the Managing Director issued an erratum on December 2, 2019, to the August 2019 report and order on calls to 911 made from multi-line telephone systems. The erratum made corrections to text in the order and the appendices.

Upcoming Filing Dates

- Dec. 11 - Replies due on a section 214 application filed by Charles W. Crow, Ruth Ann Crow, and David R. Crow (transferors) and New Florence Telephone, requesting consent to transfer control of Farber Telephone from transferors to New Florence. public notice

- Dec. 16 - PRA comments due on a revision of a currently approved information collection associated with the urban rates survey. notice

- Dec. 16 - PRA comments due on an extension of a currently approved information collection associated with section 69.123, density pricing zone plans. notice

- Dec 24 - PRA comments due on an extension of a currently approved information collection associated with FCC Form 833, application to participate in a toll-free number auction. FR

- Dec 24 - PRA comments due on an extension of a currently approved information collection associated with numbering resource optimization- phase 3. FR

- Dec 27 - Comments due on Department of Commerce notice of proposed rulemaking seeking comment on implementation of the May 15, 2019 executive order which prohibited any transactions involving information and communications technology or services designed, developed, manufactured, or supplied by persons owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary. notice

- Jan. 6 - Replies due on the effectiveness of the FCC’s 2012 tribal engagement further guidance, steps the FCC can take to assist parties with their engagement efforts, and refreshing the record on pending petitions for reconsideration that were filed on the tribal engagement obligation reporting. public notice

- Jan. 6 - Replies due on the FNPRM on proposals to amend the FCC’s schedule of regulatory fees for FY 2020. FR, order

- Jan. 13 - PRA comments due on a revision of a currently approved information collection associated with FCC Form 477, Local Telephone Competition and Broadband Reporting. The revisions to the information collection are necessitated by the August 2019 report and order on the new Digital Opportunity Data Collection. notice

- Jan. 27 - PRA comments due on a revision of a currently approved information collection associated with tariffing rules. The revisions to the information collection are necessitated by the access arbitrage order. notice