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### December 12, 2016 HIGHLIGHTS

- The FCC issued the [agenda](#) for its December 15, 2016 Open Meeting, and will consider a Report and Order and FNPRM on the transition from TTY technology to real-time text communication over wireless IP networks, a Report and Order and FNPRM to enhance the Emergency Alert System, and a NPRM on satellite systems, an Order updating its FOIA regulations, an Order on the assignment of licenses held by Maritime Communications/Land Mobile, an Order evaluating the Wireless Network Resiliency Cooperative Framework, and an Order addressing a Petition for Reconsideration of a Forfeiture Order for slamming and deceptive marketing.
- The Wireline Competition Bureau [announced](#) USAC has published final Capital Investment Allowance amounts for rate-of-return carriers in 2017.
- The Wireline Competition Bureau [provided guidance](#) to CAF recipients regarding their obligation to report geo-located broadband information and make service milestone certifications to USAC.
- The FCC issued an [Order](#) granting AT&T's [Application for Review](#) and denying SIC's [Petition for Reconsideration](#) of the WCB's 2010 [Declaratory Ruling](#) on undersea cable lease expenses. The FCC also issued an [Order](#) finding SIC improperly received \$27,270,390 from the federal high-cost support mechanisms from 2002 to June 2015, and issued a [Notice of Apparent Liability for Forfeiture and Order](#) proposing a fine of \$49,598,448 on SIC, its parent company Waimana Enterprises, and its former controlling owner. ([News release](#)).
- WTA [supplemented](#) its [response](#) on what measures should be considered to address the high level of interest in A-CAM model-based support. WTA emphasized the need for the FCC to implement A-CAM this year.
- NTCA [discussed](#) the importance of providing sufficient USF support for both the model and non-model USF mechanisms, and the negative effects on consumer rates and broadband access that will arise out of the absence of such support. Sacred Wind and NTCA [discussed](#) USF support and broadband deployment issues.
- The Nebraska Companies [asked](#) the FCC to release the final model offer so that companies can make their final election as soon as possible. TDS Telecommunications and ITTA [discussed](#) what measures should be adopted to address the high level of interest in the A-CAM. TDS [discussed](#) the importance of implementing the A-CAM option for RoR carriers.
- [ATA](#) and [ACS](#) filed comments on the [FNPRM](#) on the process to eliminate duplicative high-cost funding in areas where more than one carrier is receiving support for the provision of 4G LTE service. Replies due January 5. [FR](#)
- Oppositions [are due](#) December 21, 2016 on ACS's [Petition for Reconsideration](#) of the meaning of "high-cost" in the context of the [Order](#) establishing voice and broadband service obligations for ACS. Replies due January 3.
- The [proposed](#) universal service contribution factor for the 1Q 2017 is 16.7 percent, down from 17.4 percent.
- [Comments were filed](#) on AT&T's [Petition](#) for forbearance from certain the tariffing rules. Replies are due December 19. [Public Notice](#).
- USTelecom [opposed](#) [NTIA's](#) Petition for Reconsideration of the [IP Transitions Order](#). Replies due December 19.
- [Comments were filed](#) on what rules should be modified or repealed as part of the 2016 biennial review. Replies due January 3. [Public Notice](#)
- The FCC [will host](#) a webinar on robocalls on December 14, 2016.

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#### Other Key Upcoming Dates

- Dec. 19 - Due date for broadband-only loop service tariffs made on 15-days' notice; petitions due Dec. 27; replies due Dec. 30. [Order](#)

## USF Reform

- The Wireline Competition Bureau issued a [Public Notice](#) on December 6, 2016, announcing USAC has published final Capital Investment Allowance amounts for each rate-of-return carrier in 2017. The Bureau said the final results replace the previously published illustrative results, and reflect final 2015 data, including deployment obligations published by USAC. The allowances shown in the final results will be applicable to 2017 capital investment, absent special circumstances as provided by section 54.303(k) of the Commission's rules. The final results, the template, and the documentation of the methodology are available at <http://www.usac.org/hc/tools/default.aspx>.
- The Wireline Competition Bureau issued a [Public Notice](#) on December 8, 2016, providing guidance to CAF recipients regarding their obligation to report geo-located broadband information and make service milestone certifications to USAC. The Bureau indicated, as required by the 2016 Rate-of-Reform Return Order, USAC has nearly completed the first version of an online portal (the High Cost Universal Service Broadband portal or HUBB) to accept geo-located broadband information and related certifications. The Bureau said carriers must begin filing such information in the HUBB in 2017, and is providing this guidance so that carriers can develop internal policies and procedures to comply with these obligations in 2017.
- WTA filed a [letter](#) on December 8, 2016, supplementing its [response](#) to the Wireline Competition Bureau's [Public Notice](#) on what measures should be considered to address the high level of interest in A-CAM model-based support. WTA emphasized the need for the Commission and the Bureau to implement ACAM in whole or substantial part this year. WTA said the numerous companies electing A-CAM support urge the Commission and Bureau to take the necessary steps this year to put the A-CAM Path into effect so that they can continue making arrangements for the necessary broadband construction and build outs.
- NTCA [spoke with](#) Legal Advisors to Commissioners Pai, Clyburn, and Rosenworcel on December 5 and 6, 2016, to discuss high-cost USF reforms adopted in the March 2016 Order. NTCA emphasized the importance of providing sufficient USF support for both the model and non-model USF mechanisms, and the negative effects on consumer rates and broadband access that will arise out of the absence of such support. NTCA also said if implementation of both mechanisms were to move forward in the near-term without sufficient funding the FCC should ensure that resolution of the model elections does not have a negative effect on companies that did not elect model support and should continue thereafter to consider means of providing sufficient support. NTCA also [spoke with](#) Legal Advisors to Chairman Wheeler and Commissioners O'Rielly and Pai on December 8, 2016, to discuss the same issues.
- Sacred Wind Communications and NTCA [met with](#) Legal Advisors to Commissioners Pai, O'Rielly, and Rosenworcel on December 7, 2016, to discuss the challenges Sacred Wind faces in serving areas of the Navajo Nation in rural New Mexico. Sacred Wind discussed its reliance on high cost USF support and estimated that, even in the wake of recent reforms, standalone broadband in its service territory would cost over \$300 per subscriber, per month. Sacred Wind also discussed its desire to expand to unserved adjacent territory, but explained limitations in the current rules and the uncertainty surrounding USF support has stymied that effort. NTCA discussed the importance of providing sufficient USF support for both the model and non-model USF mechanisms, and the negative effects on consumer rates and broadband access that will arise out of the absence of such support in defiance of the expectations of reform.
- Parrino Strategic Consulting Group, on behalf of the Nebraska Companies, [spoke with](#) Wireline Competition Bureau staff on December 2, 2016, to urge the FCC to expeditiously release the final model offer so that companies can make their final election as soon as possible. The Nebraska Companies said an additional \$50 million of funding would significantly increase broadband deployment, and said if the Commission is not willing to allocate the additional \$50 million they still should proceed promptly to implement the model, claiming the model will result in significantly more broadband deployment than if electing companies remain on legacy.

- On behalf of the Nebraska Companies, Harold Furchtgott-Roth of Furchtgott-Roth Economic Enterprises, [spoke with](#) Commissioner Pai's Legal Advisor on December 8, 2016, to urge the Commission to make a timely decision on the final A-CAM offer so that companies can make their final elections.
- TDS Telecommunications and ITTA [met with](#) Commissioner O'Rielly and his Legal Advisor and Commissioner Clyburn's Legal Advisor on December 1, 2016, to discuss what measures should be adopted to address the high level of interest in the A-CAM. ITTA said while there is justification for the Commission to allocate sufficient additional funding for the A-CAM plan in order to overcome the budgetary shortfall, it understands practical considerations may militate towards the Commission only allocating the additional \$50 million. They asserted the benefits of funding the A-CAM plan fully are apparent and said the actual deployment return will far outweigh the incremental investment.
- TDS Telecommunications [spoke with](#) Legal Advisors to Chairman Wheeler and Commissioners Pai, O'Rielly, Clyburn, and Rosenworcel on November 30, 2016, and met with Commissioner O'Rielly and his Legal Advisor on December 1, 2016, to discuss universal service reform for rate-of-return carriers. TDS described the importance of implementing the A-CAM option for RoR carriers so that customers of those carriers are able to benefit from the additional broadband deployment in rural America that this model option would make possible.
- Frontier Communications filed a [letter](#) on December 9, 2016, indicating it has refined its broadband deployment plans and submitted a list of 515 additional census blocks Frontier plans to incorporate as part of its Phase I Round 2 deployment. Frontier filed another [letter](#) including a list of the specific locations associated with the census blocks it intends to count as part of CAF Phase I Round 2. (See FCC's [ECFS website](#) for attachments).
- Comments were filed on December 6, 2016, on the [FNPRM](#) on the process to eliminate duplicative high-cost funding in areas where more than one carrier is receiving support for the provision of 4G LTE service. [ATA](#) asserted the FCC should identify the amount of support in a way that better accounts for the varying costs of serving different communities, *e.g.*, by the square miles or the census blocks that are overlapped. ATA also said prior to eliminating ongoing support, the FCC should first determine if ongoing support is necessary for 4G LTE coverage to continue in these areas, and said these funds should be directed toward additional 4G LTE service outside overlapped areas as well as some level of sustaining support to operate existing networks in extremely high cost areas. [ACS](#) asserted duplicative support should be discontinued at the end of five years, and repurposed to middle-mile deployment and operation in remote Alaska, with oversight to ensure adequate, affordable, and non-discriminatory access. ACA claimed using the support to provide backhaul capability to the Bush will benefit both wireline and wireless customers. Replies are due January 5, 2017. [FR](#)
- The FCC published in the [Federal Register](#) on December 6, 2016, the [Public Notice](#) announcing ACS filed a [Petition for Reconsideration](#) of the meaning of "high-cost" in the context of the [Order](#) establishing voice and broadband service obligations for Alaska Communications. Oppositions are due December 21; replies due January 3, 2017.
- Windy City Cellular filed a [letter](#) on December 7, 2016 to confirm that it is electing to receive Alaska Plan support as specified in the final model results [released](#) on August 23, 2016. Windy City stated for an annual support amount of \$132,900, it commits to the following mobile broadband deployment obligations over the 10-year period: speeds of at least 4G LTE 118 locations in support-eligible census blocks; and the provision of service upon reasonable request to the remaining 355 locations in census blocks receiving support.
- Alaska Telephone Association member companies filed on December 6, 2016, [additional information](#) on performance obligations detailing improvements in fixed and mobile broadband service which will be accomplished under the provisions of the Alaska Plan Order. [GCI](#) also filed updated performance obligations.

- KPU Telecommunications filed a [letter](#) on December 8, 2016, providing an update to its performance obligations related to its election of the Alaska Plan. KPU said it made some changes in consideration of the [Public Notice](#) released on December 8, 2016, and after discussions with FCC staff.
- ViaSat and WISPA [met with](#) Chairman Wheeler's Legal Advisor and Wireline Competition Bureau staff on December 5, 2016, to discuss their concerns with the Petition for Expedited Waiver filed by New York State's [Petition for Expedited Waiver](#) of the CAF Phase II auction rules to make available to New York the amount of Phase II model-based support that Verizon declined in the state. ViaSat and WISPA claimed the Petition seeks to claim funds in advance of the nationwide reverse auction, in a manner that contravenes the auction framework adopted in the CAF II Report and Order.
- New York, through its chief economic development agency, Empire State Development, filed a [letter](#) on December 5, 2016, to urge the FCC to grant its Petition for Expedited Waiver of the CAF Phase II auction rules. The ESD asserted the FCC will lose an opportunity to facilitate the deployment of broadband infrastructure in rural New York communities if it does not quickly grant the Petition.

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## ICC

- In addition to comments reported in a previous edition of REGScan, comments were filed on December 2, 2016, on AT&T's [Petition](#) asking the FCC to forbear from the tariffing of access charges for tandem switching and tandem-switched transport for all LECs, including intermediate LECs, on all calls to or from LECs engaged in access stimulation. [CenturyLink](#) said the FCC should deny AT&T's request regarding tandem charges and instead, take a more targeted approach that will address a broader range of ongoing arbitrage problems relating to tandem charges. CenturyLink also said the FCC could better address AT&T's request on database query charges by clarifying that those charges are subject to the CLEC benchmark rule. [James Valley Telephone Coop, et al.](#) said the FCC should deny AT&T's Petition for Forbearance because AT&T lacks standing to seek the forbearance as a customer of the services. [List of all comments available to date](#). Replies are due December 19. [Public Notice](#).
- HD Tandem filed an [Amended Opposition](#) on December 7, 2016, to AT&T's [Petition](#) asking the FCC to forbear from the tariffing of access charges for tandem switching and tandem-switched transport for all LECs, including intermediate LECs, on all calls to or from LECs engaged in access stimulation. HD Tandem said it filed the amended opposition to insert the word "not" into the third bullet on the fourth page. Replies are due December 19. [Public Notice](#)

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## Broadband

- Commissioner O'Rielly [spoke](#) before the New England Ratepayers Association on December 6, 2016. He discussed government-owned networks and said localities would be wise to consider what steps a community might take to encourage more private sector investment. He suggested communities could ease access to rights of way, facilitate tower siting, and cut other red tape and requirements, such as demanding that providers donate equipment or provide free service to government buildings. He also said the Commission has begun using cost models and reverse auctions to provide more efficient levels of support, and said the next steps are to finalize the CAF Phase II auction, the Mobility Fund Phase II auction, and Remote Areas Fund. He also discussed future FCC activities and suggested fixes to the FCC's internal process and reorganizing the FCC structure, and removing rules and regulations that have outlived their usefulness.
- Commissioner Pai [spoke](#) at the Free State Foundation's Tenth Anniversary Gala Luncheon on December 7, 2016, discussing the Open Internet Order, broadband, and FCC reform. He said he

believes the Open Internet Order's days are numbered, and said beginning next year the FCC's general regulatory approach will be a more sober one that is guided by evidence, sound economic analysis, and humility, and is optimistic the FCC will respect the limits that Congress has placed on its authority. He asserted that with regards to the municipal broadband Order, the FCC's leadership was more interested in making a political statement than respecting the rule of law. He also said the FCC needs to remove outdated and unnecessary regulations and said it is time to bring more openness and transparency to the FCC.

- Mosaik Solutions [met with](#) Legal Advisors to Commissioners O'Rielly and Pai on December 5 and 6, 2016, to discuss mobile network coverage and performance data. Mosaik discussed the FCC's plans for exclusive use of FCC Form 477 data in the Mobility Fund II context, and expressed concerns about the timeliness and the accuracy of the Form 477 data. Mosaik also discussed the FCC's adoption of the mobile Measuring Broadband America data as a "safe harbor" in the context of the Open Internet transparency rules, and asserted FCC reliance on a single data source will produce an incomplete depiction of mobile network coverage and performance.

## IP Transition

- USTelecom filed an [Opposition](#) on December 8, 2016, to [NTIA's](#) Petition for Reconsideration of the [IP Transitions Order](#) that updated the FCC's review and notice procedures governing the filing and processing of section 214 applications. USTelecom asserted NTIA proposes additional Commission actions that could, if implemented, make it more complicated, timely, and costly for providers to discontinue antiquated legacy services and replace them with next-generation technologies. Replies due December 19. [FR](#)

## Open Internet

- WISPA, ACA, NTCA, and CCA [met with](#) Legal Advisors to Chairman Wheeler, and Commissioners Rosenworcel and Pai on December 5 and 6, 2016, to discuss the item on circulation regarding extending the exemption for small broadband internet access service providers from the enhanced transparency requirements established by the 2015 Open Internet Order. They urged the Commission to grant small BIAS providers a waiver, as contemplated, before the exemption expires on December 15, 2016, and said the proposed waiver would relieve small BIAS providers from the burdens of the enhanced transparency obligations until the Commission determines the proper requirements for those providers.

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## USF

- The FCC Managing Director issued a [Public Notice](#) on December 9, 2016, announcing the proposed universal service contribution factor for the first quarter of 2017 will be 16.7 percent, down from 17.4 percent from the previous quarter.
- The Wireline Competition Bureau released an [Order](#) on December 9, 2016, denying a number of petitions by parties seeking designations as Lifeline-only ETCs. The Bureau said due to the failure of the requesting parties listed in Appendices A and B to file affirmative statements attesting to a continued interest in having the pending applications considered by the Bureau, their applications are denied.
- In addition to requests listed in a previous edition of REGScan, requests were filed seeking forbearance from the requirement for Lifeline-only ETCs to offer Lifeline-supported BIAS services. [All requests available to date](#)

- The Public Utility Division of the Oklahoma Corporate Commission filed [comments](#) on December 9, 2016, on FreedomPop's [Petition](#) seeking designation as a Lifeline Broadband Provider. Given that FCC already conditionally granted FreedomPop's petition, the PUD suggested the FCC should provide specific direction to USAC with regard to what reasonable format for service area descriptions would be consistent with the statute.
- Zing Wireless filed a [Petition](#) on December 8, 2016, requesting streamlined designation as a Lifeline Broadband Provider ETC for the sole purpose of receiving universal service Lifeline support for the provision of broadband internet access service. Zing provided a list of states and zip codes in which it seeks designation.
- Q LINK Wireless [met with](#) Wireline Competition Bureau staff on December 1, 2016, to discuss its [Petition](#) for Designation as a Lifeline Broadband Provider and its response to the Public Utility Division of the Oklahoma Corporation Commission. Q LINK asserted there is no reason to withhold grant of its application and that it has been seeking ETC designations for the FCC-designated states for more than five years.
- The Lifeline Connects Coalition [met with](#) Chairman Wheeler's Legal Advisor and Wireline Competition Bureau staff and [Commissioner Rosenworcel's](#) Legal Advisor on December 2, 2016, to discuss the status of the Lifeline Broadband Provider petitions filed by Coalition members Blue Jay, i-wireless and Telrite to offer Lifeline-supported broadband services. The Coalition also discussed its [Petition](#) for Reconsideration of the Lifeline Order.
- Tele Circuit filed a [Petition](#) on December 8, 2016, seeking streamlined designation as a Lifeline Broadband Provider ETC only for purposes of participation in the Lifeline program and said it will not seek High-Cost support. Commnet Wireless also filed petitions seeking to be an LBP ETC in [Arizona](#) and [Montana](#).
- Reply comments were filed on December 5, 2016, on petitions filed by [Microsoft, et al.](#) and the [Samuelson-Glushko Technology Law & Policy Clinic](#), requesting the FCC allow E-rate subsidized broadband networks to be accessed by students at home for educational purposes. [NTCA](#) urged the Commission to dismiss the petitions, and said they raise several troubling questions, including whether the use of E-rate funds as requested by Petitioners would be inconsistent with section 254(h). [USTelecom](#) asserted the petitions represent an inappropriate and inefficient use of the USF that would jeopardize the integrity of the E-rate program and the sustainability of the E-Rate fund, and should either be denied, or considered by the full Commission in a rulemaking proceeding. [NCTA](#) said the Commission must ensure that granting the petitions will not have negative unintended consequences for the E-rate program and for other federal and private efforts to expand broadband in unserved and underserved areas. [CenturyLink](#) claimed the petitions raise too many problems, and create too many risks for the E-rate program and cannot be granted by the Bureau on delegated authority, but need review and rulemaking by the full commission. [T-Mobile](#) said while there is a compelling need to allow E-rate to fund broadband for educational purposes outside of school, these petitions are unnecessarily narrow and limited vehicles to do so. T-Mobile suggested the Commission should instead waive, forbear from, or modify its rules to allow E-rate to support mobile broadband. [Microsoft](#) asserted there are no legal obstacles to grant of the petitions and said they satisfy the educational purpose requirements of the statute and the Commission's rules. The [Boulder Valley School District](#) said granting the petitions would constitute a great step forward in promoting digital equality and closing the Homework gap. [List of all replies available to date](#) | [Public Notice](#)
- Comments were due December 9, 2016, on proposed changes to the annual and quarterly Telecommunications Reporting Worksheets (FCC Forms 499-A, 499-Q) and accompanying instructions to be used in 2017 to report 2016 revenues. [Public Notice](#)
- Locus Telecommunications filed a [Reply](#) on December 9, 2016, to Neustar's [Opposition](#) to Locus' [Request for Review](#) of the rejection of its requests for review of its TRS, LNP and NANPA fee invoices. Locus had asked the FCC to direct the Program Administrators to recognize Locus as a private carrier, exempt from Title II program fees on private carriage revenue, and issue refunds for Title II program

fees paid. Locus said its request is timely and procedurally sound and that USAC issued no decision for Locus to appeal prior to filing its request.

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## Misc.

- The FCC issued the [agenda](#) for its December 15, 2016 Open Meeting. The FCC will consider a Report and Order and FNPRM on the transition from TTY technology to real-time text communication over wireless IP networks, a Report and Order and FNPRM to enhance the Emergency Alert System, and a NPRM to update, clarify, and streamline the FCC's rules on non-geostationary satellite orbit, fixed-satellite service satellite systems. The FCC will also consider an Order updating its FOIA regulations, an Order on Reconsideration and Memorandum Opinion and Order on the assignment of licenses held by Maritime Communications/Land Mobile, an Order evaluating the Wireless Network Resiliency Cooperative Framework, and a Memorandum Opinion and Order that addresses a Petition for Reconsideration of a Forfeiture Order for slamming and deceptive marketing. The FCC will also consider five items as consent agenda.
- The FCC issued a [Memorandum Opinion and Order](#) on December 5, 2016, granting AT&T's [Application for Review](#) and denying Sandwich Isles Communications' [Petition for Reconsideration](#) of the Wireline Competition Bureau's 2010 [Declaratory Ruling](#) that decided certain disputed Paniolo, undersea cable lease expenses should be included in SIC's revenue requirement for recovery through the NECA pooling process. The FCC directed NECA to discontinue payment of the disputed amounts and to cease allowing SIC to include 50 percent of the disputed lease costs of the Paniolo cable lease expenses, and certain other expenses in its revenue requirement. ([News release](#))
- The FCC issued an [Order](#) on December 5, 2016, finding Sandwich Isles Communications improperly received payments in the amount of \$27,270,390 from the federal high-cost support mechanisms from 2002 to June 2015. The FCC also found management fees paid by Sandwich Isles to its parent company Waimana Enterprises were excessive, and directed USAC to calculate the total amount of improper payments for inflated management fees and to take action to recover those amounts from Sandwich Isles. Further, the FCC directed Sandwich Isles to resubmit its cost studies and high-cost forms for costs incurred in 2013, 2014, and 2015, within 60 days after the date of this Order so that USAC can determine the proper amount of high-cost support, and directed USAC to undertake an investigation of Sandwich Isles' affiliate transactions for costs incurred in calendar year 2016.
- The FCC issued a [Notice of Apparent Liability for Forfeiture and Order](#) on December 5, 2016, proposing a fine of \$49,598,448 on Sandwich Isles Communications, its parent company Waimana Enterprises, and its former controlling owner Albert Hee for apparent violations of the Commission's accounting rules and methods, and submitting and certifying inaccurate data used to obtain millions of dollars in improper high-cost support payments.
- The Department of Hawaiian Home Lands [met with](#) Legal Advisors to Commissioners O'Rielly, [Pai](#), and [Rosenworcel](#) on December 1, 2016, to discuss the proceeding on USF payments and NECA tariff issues relating to Sandwich Isles Communications. DHHL said its primary concern is that native Hawaiians currently served by SIC continue to receive quality telecommunications services and said it is available to assist the FCC in telecommunications matters under FCC jurisdiction that relate to the Hawaiian Home Land. The DHHL also [met with](#) Chairman Wheeler's Legal Advisor and Wireline Competition Bureau staff on December 7, 2016, to discuss the same issues.
- Comments were filed on December 5, 2016, on what rules should be modified or repealed as part of the 2016 biennial review. [Verizon](#) said the FCC should determine whether, and to what extent, tariffs remain necessary in today's marketplace, and said the FCC should ensure network and service change rules do not impede technology transitions. Verizon also suggested the FCC eliminate the Part 32 rules as applied to price cap carriers; repeal the rate averaging rule and the associated certification requirement, and repeal what it says are outdated and unnecessary Universal Service requirements.

[CenturyLink](#) suggested changes to the universal service contribution rules, and Part 69 pricing flexibility rules; and suggested the FCC eliminate: obligations arising under section 272, rule 64.1903 structural separation requirements for independent ILECs, Part 51 interconnection requirements arising under section 251, Part 54 residual ETC voice obligations in high-cost areas where price cap carriers do not receive high-cost universal service support and universal service audit requirements; Part 32 accounting rules; and certain Open Internet rules. [USTelecom](#) said the FCC should eliminate any regulations that inhibit broadband infrastructure investment, suggested the FCC eliminate costly and burdensome accounting, reporting, and recordkeeping regulations, reverse its Title II classification of broadband internet service, and consider whether existing tariffing regulations continue to serve a useful purpose in today's competitive marketplace. [Sprint](#) suggested the FCC eliminate section 64.1310, the payphone annual compensation audit. Sprint said given the dramatic reduction in the use of payphone calling the audit costs imposed by section 64.1310 rule are vastly disproportionate to the revenue being audited. Sprint also suggested the FCC eliminate section 64.1900, which requires non-dominant IXCs to certify annually that they are providing domestic interexchange services in compliance with the geographic rate averaging and rate integration requirements in Section 254(g). [List of all comments available to date](#). Replies due January 3, 2017. [Public Notice](#)

- AT&T, CenturyLink and Verizon [met with](#) Wireline Competition Bureau and General Counsel staff on December 1, 2016, to discuss the elimination of Part 32 obligations for price cap carriers. They maintained obligations under section 272(e)(3) would be unaffected by a shift from Part 32 accounting to GAAP accounting if a GAAP ledger maintained a comparable entry for affiliate transactions subject to the requirement. They also said imputation of affiliate transactions for the small and shrinking amount of services subject to the requirement would be readily available making compliance a non-issue. They also discussed a framework for transitioning from Part 32 to GAAP accounting for the determination of pole attachment rates.
- The FCC issued a [Public Notice](#) on December 8, 2016, announcing the Consumer and Governmental Affairs Bureau will host a webinar on robocalls on December 14, 2016, from 1:00 p.m. to 2:00 p.m. The webinar, which is free and intended for all consumers, will provide information about consumers' rights and the steps they can take to prevent robocalls.
- Panhandle Telephone Cooperative filed a [Petition](#) for Extraordinary Retirement on December 8, 2016, seeking approval for a journal entry to credit Account 3212 - Accumulated Depreciation, and a corresponding journal entry to debit Account 1438 - Deferred Maintenance and Retirements. Panhandle said these journal entries represent the combined effect of the retirement of the fixed wireless local loop network from Account 3212, and the associated cost of removal and salvage value recorded. Panhandle requested the retirement be amortized over five years, beginning with calendar year 2017 and ending in calendar year 2021.
- The Wireline Competition Bureau issued a [Public Notice](#) on December 5, 2016, announcing a LNP administrator transition outreach and education plan webcast will be held on December 13, 2016.
- Neustar filed a [letter](#) on December 2, 2016, responding to the North American Portability Management's [letter](#) which responded to Neustar's [Number Portability Administration Center Transition Status Report](#). Neustar said the Transition Report provided the parties with an opportunity to consider Neustar's substantive and constructive observations, provided by IT experts regarding specific areas in need of improvement, and suggested the parties accept the observations of IT transition professionals to ensure that the transition is on solid footing and to avoid future setbacks.

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## Upcoming Filing Dates

- Dec. 19 - Replies due to oppositions on Petitions for Reconsideration filed by [NASUCA, et al.](#) and [NTIA](#) of the [IP Transitions Order](#) that updated the FCC's review and notice procedures governing the

filing and processing of section 214 applications to discontinue, reduce, or impair service. [FR](#), [Public Notice](#)

- Dec. 19 - Due date for broadband-only loop service tariffs made on 15-days' notice; petitions due Dec. 27; replies due Dec. 30. [Order](#)
- Dec. 19 - Replies due on AT&T's [Petition](#) for forbearance from certain tariffing rules. [Public Notice](#)
- Dec. 21 - Oppositions due to ACS' [Petition for Reconsideration](#) of the meaning of "high-cost" in the context of the [Order](#) establishing voice and broadband service obligations for Alaska Communications. Replies due January 3. [Federal Register](#)
- Dec. 27 - Due date for broadband-only loop service tariffs made on 7-days' notice; petitions due December 29; and replies due December 30. [Order](#)
- Jan. 3 - Replies due on what rules should be modified or repealed as part of the 2016 biennial review. [Public Notice](#)
- Jan. 3 - Replies to oppositions due on ACS' [Petition for Reconsideration](#) of the meaning of "high-cost" in the context of the [Order](#) establishing voice and broadband service obligations for Alaska Communications. [Federal Register](#)
- Jan. 5 - Replies due on the [FNPRM](#) on the process to eliminate duplicative high-cost funding in areas where more than one carrier is receiving support for the provision of 4G LTE service. [FR](#)

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