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December 17, 2018 HIGHLIGHTS

- At its December 12, 2018 [Open Meeting](#), the FCC adopted a [Report and Order](#) that offers additional funding to carriers that currently receive A-CAM support in exchange for deploying broadband at increased speeds, provides an opportunity for legacy carriers to transition to model-based support, and authorizes additional support for carriers remaining on the legacy rate-of-return support mechanisms in exchange for targeting higher broadband speeds. The accompanying FNPRM seeks comment on implementing an auction mechanism for support in legacy areas that are overlapped by an unsubsidized competitor, addressing budgetary impacts as carriers transition to broadband-only lines, and incorporating a Tribal Broadband Factor into the legacy CAF-BLS mechanism. Comments are due 30 days after the FNPRM is published in the Federal Register; replies due 60 days after FR.
- The FCC adopted five other items at its December 12, 2018 [Open Meeting](#), including: a [Second Report and Order](#) to create a comprehensive database to enable callers to verify whether a telephone number has been disconnected before calling that number, thereby helping to protect consumers with reassigned numbers from receiving unwanted robocalls; a [Declaratory Ruling](#) that classifies SMS and MMS wireless messaging as information services to help prevent consumers from receiving spam robotexts; and a [Report](#) consolidating several previously separate FCC reports into a single report on the state of the broader communications market in the United States.
- The FCC [announced](#) the proposed universal service contribution factor for the first quarter of 2019 will be 20 percent, down from the current 20.1 percent.
- The USDA [announced](#) it is offering up to \$600 million in loans and grants to help build broadband infrastructure in rural America.
- The FCC [released](#) updated data on [fixed broadband deployment](#) and [mobile voice and broadband deployment](#). The FCC's Associate CIO [indicated](#) the National Broadband Map will be decommissioned on December 21, 2018, replaced the new Fixed Broadband Deployment [map](#). Commissioner Rosenworcel [discussed](#) problems with broadband mapping accuracy.
- The FCC [announced](#) it will re-charter the Broadband Deployment Advisory Committee and seeks nominations for membership.
- Reps Greg Walden (R-Ore.) and Marsha Blackburn (R-Tenn.), [requested](#) a briefing on the pending USTelecom forbearance proceeding and on the CAF Phase II auction results.
- Commissioner Rosenworcel [sent letters](#) to major phone companies calling on them to offer free robocall blocking solutions to consumers across the country.
- The [Report and Order](#) that allowed all carriers to use the simpler jurisdictional separations processes previously reserved for smaller carriers [is effective](#) January 1, 2019.
- The Wireline Competition Bureau issued [an Order](#) granting the Petitions for Waiver filed by [Telapex](#) and [Venture Communications](#) of certain Part 51 rules, so each may merge their RoR study areas.
- CenturyLink [said](#) the FCC should adopt the CenturyLink "direct connection" proposal, and it urged adoption of the [NTCA, et al.](#) proposal for addressing access stimulation schemes.

Other Key Upcoming Dates

- Dec. 18 - Oppositions due to SDN's direct case in the proceeding on September 17, 2018 tariff revisions. [Order](#)
- Dec. 18 - Comments due on TracFone's [Petition](#) to alter implementation of the Lifeline National Verifier. Replies are due December 26, 2018. [Public Notice](#)
- Jan. 14 - Comments due on the [FNPRMs](#) attached to the [Order](#) allowing certain RLECs that receive fixed high-cost support to transition from RoR regulation to incentive regulation for their business data services. Replies are due February 12, 2019. [FR](#)

Editor: [Teresa Evert](#) | Assistant Editor: [Shawn O'Brien](#)

USF Reform

- The FCC released a [Report and Order](#) on December 13, 2018, that offers additional funding to carriers that currently receive A-CAM support in exchange for deploying broadband at increased speeds, provides an opportunity for legacy carriers to transition to model-based support, and authorizes additional support for carriers remaining on the legacy rate-of-return support mechanisms in exchange for targeting higher broadband speeds. In the accompanying Order on Reconsideration, the FCC denied three petitions seeking reconsideration of the FCC's decision directing the Wireline Competition Bureau to offer additional A-CAM support up to \$146.10 per-location to all carriers that accepted the revised offers of A-CAM. In the accompanying FNPRM, the FCC seeks comment on implementing an auction mechanism for support in legacy areas that are overlapped by an unsubsidized competitor, addressing budgetary impacts as carriers transition to broadband-only lines, and applying the Tribal Broadband Factor from the A-CAM II offer to legacy carriers. Comments are due 30 days after the FNPRM is published in the Federal Register; replies are due 60 days after Federal Register.
- Hughes Network Systems filed [a letter](#) on December 7, 2018, to summarize the record on Hughes and Viasat's separate Petitions for Reconsideration of the Network Performance Measurements Order and to respond to assertions made by Viasat in its recent filing contesting Hughes's opposition to the Viasat Petition. Hughes asserted the Commission will best promote efficient and accurate outcomes in USF support auctions if it safeguards the bedrock principle that the standards applicable to auction participants must be clear before an auction begins and should not be substantively changed after an auction is over. Hughes said it can do so by denying the Viasat Petition and granting the Hughes Petition.
- Reps. Greg Walden (R-Ore.), Chairman of the House Energy & Commerce Committee, and Marsha Blackburn (R-Tenn.), Chairman of the Subcommittee on Communications and Technology, sent [a letter](#) to Chairman Pai on October 24, 2018, requesting a briefing on the pending USTelecom forbearance proceeding and a historical perspective on the FCC's use of the forbearance process as authorized under the Telecommunications Act of 1996. They also requested a presentation on the CAF Phase II auction results. They said they would be interested to learn more from the Commission on how inflation, cost of capital, replacement and repair expenses, available technologies, and other inputs have changed and how those changes will alter the cost structure of future networks. They would also be interested to learn how the UNEs regime has worked in the marketplace since the FCC's implementation of the Act and to review the results of the recently concluded CAF Phase II auction.
- GVNW and Range Telephone Cooperative [met separately with](#) Advisors to Chairman Pai and Commissioners O'Rielly, Carr, and Rosenworcel on December 10 and 11, 2018, to provide updates from Range on the progress of its A-CAM performance obligations.
- The Rural Wireless Association [met separately with](#) Commissioner Carr and his Legal Advisor, Commissioner O'Rielly and his Advisor, Advisors to Chairman Pai and Commissioner Rosenworcel, and staff from the Rural Broadband Auctions Task Force, the Sprint/T-Mobile Transaction Task Force, and the Wireline Competition Bureau on December 6, 2018, to discuss the Mobility Fund Phase II challenge process, the proposed Sprint/T-Mobile transaction, and the Public Notice on the applicability of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 to the Commission's Protecting Against National Security Threats to the Communications Supply Chain rulemaking. RWA said concerns about overstated coverage by Verizon and T-Mobile have been borne out by the MF II challenge process data. It asked the Commission to further investigate the coverage data submitted by Verizon and T-Mobile and require corrected data going back to the January 4, 2018 time period and, in addition, to prohibit carriers who filed overstated coverage, projected coverage, or false coverage from participating in the MF-II reverse auction. It also suggested the Commission order those carriers that filed overstated coverage to pay the costs incurred by those entities that participated in the challenge process
- T-Mobile filed [a letter](#) on December 14, 2018, to respond to RWA's December 6, 2018 [ex parte](#) wherein RWA claimed T-Mobile overstated its 4G LTE coverage in its submitted Mobility Fund Phase II shapefiles. T-Mobile said it has not been contacted by the Commission regarding the agency's

announced investigation into alleged violations of the MF-II 4G LTE data collection and has no reason to believe that T-Mobile is involved. It asserted RWA's vague and irresponsible statements regarding T-Mobile's MF-II maps are unsupported by any evidence and are patently false. It claimed RWA's misrepresentations are part of an ongoing pattern of baseless allegations against T-Mobile designed to delay or thwart competition in rural America and deprive rural Americans of meaningful choice for broadband services.

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ICC

- The Wireline Competition Bureau issued [an Order](#) on December 11, 2018, granting, to the extent provided for in the Order, the Petitions for Waiver filed by [Telapex](#) and [Venture Communications Cooperative](#) so each may merge their rate-of-return study areas. The Bureau waived the rules to the extent necessary to allow the merged entities to charge uniform adjusted switched access rates and to combine the Base Period Revenue amounts of the merging entities. It noted as participants in the NECA traffic-sensitive tariff, the merged carriers' local switching, dedicated transport, and tandem switching rates of the merging study areas will be included in rate bands reflecting comparable cost groupings, and after they merge, the carriers must charge a single rate for each type of rate element..
- CenturyLink [met with](#) Wireline Competition Bureau staff on December 4, 2018, to discuss access arbitrage. It said the Commission should promptly adopt the CenturyLink "direct connection" proposal, and it urged adoption of the [NTCA, et al.](#) proposal for addressing access stimulation schemes. CenturyLink also suggested the Commission adopt reforms to its 8YY intercarrier compensation rules that: cap database query rates at \$0.0042 and then transition over three years to a cap of \$0.0015; impose a limit of one database query charge per call; transition originating end office access charges to bill-and-keep over three years; cap originating tandem switching and transport charges for both affiliated and unaffiliated traffic at a low, uniform rate, such as \$0.0017; and provide an opportunity for ILECs to recover revenues by permitting them to charge a SLC disciplined by the competitive market and eliminating the ARC.
- AT&T met separately with Advisors to Commissioners [O'Rielly](#) and [Rosenworcel](#) on December 6, 2018, to discuss the access stimulation NPRM. AT&T encouraged adoption of "prong one" in the NPRM, but opposed "prong two," saying it would allow those engaged in arbitrage to dictate the marketplace. AT&T also expressed support for Verizon's November 28, 2018 ex parte that opposed allowing tariffed end office switching charges for over-the-top VoIP traffic that is transmitted over the internet. AT&T encouraged the Commission to complete the ICC transition to a nationwide detariffed regime in which carriers seeks cost recovery from their own end users.
- South Dakota Network filed a redacted version of its [Direct Case](#) on December 11, 2018, in response to the Commission's November 29, 2018 Order designating issues for investigation in SDN's 2018 Tariff No. 1. SDN noted the Commission designated one issue for investigation concerning "the appropriate benchmark rate for SDN's interstate switched access service." SDN asserted: it has used the correct competing ILECs to calculate its benchmark; it used the appropriate services to calculate its benchmark; and its use of a single rate for switched access service is justified.
- Aureon Network Services filed a [Rebuttal](#) on December 12, 2018, to AT&T's [opposition](#) to Aureon's direct case in connection with its Tariff No. 1 revisions filed on September 24, 2018. Aureon asserted the FCC should find that Aureon's tariff rate is lawful, that its good-faith fair market value estimates are reasonable, and that its updated cost study fully supports Aureon's filed rate. [Order](#)
- No replies were filed on Interstate Telecommunications Cooperative's [Petition](#) for a waiver of sections 51.909(a), 51.917(b)(1) and 51.917(b)(7) to allow it to recalculate the rate bands and charges for local switching, tandem switching, and dedicated transport services for two study areas it seeks to merge on January 1, 2019. [Public Notice](#)

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Broadband

- The FCC issued a [Public Notice](#) on December 11, 2018, announcing its intent to re-charter the Broadband Deployment Advisory Committee and seeking nominations for membership on the BDAC. The Commission intends to renew the BDAC's charter for a period of two years, starting on or about March 1, 2019. Nominations for membership to the BDAC are due January 10, 2019.
- The FCC issued a [Public Notice](#) on December 12, 2018, announcing the Wireline Competition and Wireless Telecommunications Bureaus released updated data on [fixed broadband deployment](#) and [mobile voice and broadband deployment](#) as of December 31, 2017. These data were collected through FCC Form 477 and are available on the Commission's website. The fixed broadband data include revisions made by filers through November 13, 2018, while the mobile deployment data include revisions through June 13, 2018.
- Rich Mansfield, Associate Chief Information Officer, [wrote a blog](#) on December 7, 2018, announcing that based on the age of the data and the underlying technology, the National Broadband Map and its Application Program Interface will be decommissioned on December 21, 2018. He said the FCC released a new Fixed Broadband Deployment map in February 2018 to display new data collected by the FCC from carriers on FCC Form 477, which is updated twice annually. The blog provides a link to the new Fixed Broadband Deployment [map](#) and links to mobile broadband maps and other maps.
- Commissioner Rosenworcel [spoke](#) at the Pew Charitable Trusts on December 11, 2018, to discuss problems with broadband mapping accuracy. She noted that while the FCC's latest report shows that 24 million Americans lack access to high-speed internet service, the *New York Times* recently reported 162 million people across the country do not use internet service at broadband speeds. She said the FCC's new fixed broadband map and the map for the Mobility Fund still have problems with accuracy, and suggested: policymakers work collaboratively across all levels of government to get the maps right; the FCC find ways to ensure the maps are consistent so that comparisons between areas with and without service are just and useful; and the FCC explore new ideas about how it can improve the maps.
- The U.S. Department of Agriculture [announced](#) on December 13, 2018, it is offering up to \$600 million in loans and grants to help build broadband infrastructure in rural America. The USDA said telecommunications companies, rural electric cooperatives and utilities, internet service providers, and municipalities may apply for funding through USDA's new ReConnect Program, noting Congress appropriated funds in the fiscal year 2018 budget for this broadband pilot program.
- The Senate [voted](#) on December 11, 2018, to approve the [2018 Farm Bill](#). The bill, among other things, provides \$50 million annual for Community Connect Grant Program, \$10 million annually for middle-mile infrastructure grants and loans, and \$10 million annually for the Innovative Broadband Advancement Program (formally the Rural Gigabit Network Pilot Program) for years 2019-2023. The bill also changes the definition of minimum acceptable speed for rural areas to 25/3 Mbps- up from 4/1 Mbps.
- Sens. Amy Klobucher (D-Minn.) and Shelley Moore Capito (R-WV) [announced](#) on December 14, 2018, passage of the [Measuring the Economic Impact of Broadband Act](#) in the Senate. They said the bill would require the FCC's Bureau of Economic Analysis to conduct a study of the effects of broadband deployment and adoption on the U.S. economy and to consider job creation, business headcount, online commerce, income, education and distance learning, telehealth, telework, agriculture, population growth, population density, broadband speed, and geography in the analysis.
- USTelecom [met with](#) Chairman Pai's Special Counsel on December 13, 2018, to discuss Form 477 and its proposal described in its October 17, 2018 [ex parte](#). It also discussed potential next steps to advance the proposal.

- U.S. TelePacific, Mpower Communications, and Arrival Communications, all d/b/a TPx Communications, [met with](#) Chairman Pai's Legal Advisor on December 7, 2018, to express opposition to USTelecom's [Petition](#) for Forbearance from certain regulatory obligations imposed on ILECs. TPx discussed the continued importance of UNEs and resale to competitive markets and the adverse impact forbearance from section 251(c) obligations would have on its customers. It urged the FCC to deny the Petition.
- The Wireless Telecommunications Bureau issued an [Order](#) on December 10, 2018, denying National League of Cities, et al.'s [Motion for Stay](#) of the September 27, 2018 [Declaratory Ruling and Report and Order](#) on wireless infrastructure deployment. The Bureau said allowing the Order to take effect as scheduled will give wireless providers and the consumers they seek to serve greater certainty due to the clear and objective standards that will govern local governments' review of proposed new deployments going forward, as well as the reduction of investment barriers caused by excessive fees or unduly restrictive land-use requirements.
- The Utilities Technology Council [met with](#) Commissioner O'Rielly's Legal Advisor on December 10, 2018, to urge the Commission to issue an Order to enable utilities to share the 4.9 GHz band with public safety on a co-primary basis. UTC also provided a set of resolutions that formally established UTC's policy positions on a number of issues that were pending in proceedings at the FCC, as well as other issues that were not pending before the Commission. These resolutions were attached.

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IP Transition

- To date, no replies have been filed on expanding the list of key applications and functionalities for which a carrier must demonstrate interoperability when requesting to discontinue a legacy voice service pursuant to the adequate replacement test. [Public Notice](#)

Universal Service

- The FCC Office of Managing Director issued a [Public Notice](#) on December 12, 2018, announcing the proposed universal service contribution factor for the first quarter of 2019 will be 20 percent, down from the current 20.1 percent.
- The Wireline Competition Bureau issued a [Public Notice](#) on December 13, 2018, to announce that effective January 15, 2019, the National Lifeline Eligibility Verifier will fully launch in Hawaii, Idaho, New Hampshire, North Dakota, South Dakota and Guam. The Bureau said ETCs in these five States and one territory will be required to use the National Verifier to make eligibility determinations for all consumers applying for Lifeline service and must cease using legacy eligibility processes for prospective Lifeline subscribers.
- The Wireline Competition Bureau issued a [Public Notice](#) on December 13, 2018, seeking comments on USTelecom, CTIA, and ITTA's [Petition](#) for a one-time waiver of section 54.420, which requires completion of a biennial audit. They said granting the requested waiver would remove the duplication of audits of Lifeline ETCs while still ensuring the Commission's overall policy of rooting out fraud, waste, and abuse in the Lifeline program is not hindered. Comments are due December 27, 2018; replies are due January 3, 2019.
- The Telecommunications Association of Michigan filed a [letter](#) on December 11, 2018, to express support for the Michigan PUC's [request](#) for an extension of Michigan's current Lifeline waiver for an additional six months, until June 28, 2019. TAM asserted extension of the waiver period will, among other things, enable Michigan to implement the administrative changes required by the FCC's Lifeline Orders and revised FCC rules.

- To date, no comments were filed on Sunset Digital Communications' [Petition](#) seeking ETC designation in Tennessee and Virginia for the purpose of receiving CAF Phase II support. Replies are due December 20, 2018. [Public Notice](#)
- In addition to reply comments listed in last week's *REGScan*, replies were filed on December 7, 2018, on the applicability of the [John S. McCain National Defense Authorization Act for Fiscal Year 2019](#) to the FCC's Protecting Against National Security Threats to the Communications Supply Chain rulemaking and to the programs the Commission oversees. The [Rural Wireless Association](#) said section 889(b)(1) of the 2019 NDAA applies only to loan or grant funds and therefore does not apply to USF subsidies. It also claimed section 889 is intended to apply only to the federal government's procurement process, of which the USF is not a part. [Huawei](#) said section 889(b)(1) only applies to federal loan and grant programs, and asserted the USF does not constitute a procurement or a procurement contract that is subject to the prohibition in section 889(b)(1), nor is USAC a federal executive agency and does not obligate or expend USF funds, so these funds are not subject to section 889(b)(1). [All replies available to date](#). [Public Notice](#)
- AT&T [met with](#) Wireline Competition Bureau staff on December 11, 2018, to urge the Commission to move forward with its proposed Uniendo a Puerto Rico Fund and Connect USVI Fund Stage 2 funding for mobile providers, with some modifications. AT&T recommended the Commission allocate funding between the territories based on the latest Census Bureau population figures and not based on the legacy amounts each territory received pre-hurricanes. AT&T also expressed support for disbursing all Stage 2 Mobility Fund support among mobile providers within each jurisdiction based on their FCC Form 477 filings and asked the Commission to reject its proposal to impose MFII service obligations on these recipients.
- Neptuno Media [met with](#) Wireline Competition Bureau staff on December 6, 2018, to discuss Stage 2 restoration funding for Puerto Rico and the US Virgin Islands. Neptuno reiterated its position that carriers like Neptuno should be eligible to receive Stage 2 support on equal footing with the wireline carriers. Neptuno also agreed to provide certain data to assist the staff in determining how certain metrics associated with obtaining Stage 2 funding should be evaluated.
- Chairman Pai sent [letters](#) to Sens. Dan Sullivan (R-AK) and Lisa Murkowski (R-AK) on November 30, 2018, in response to their letter on rural health care in Alaska. Pai said he will commit to three steps he and Sen. Sullivan previously discussed: moving forward with an order adopting new rules for the Rural Health Care Program in 2019; drafting a Public Notice reminding participants of the rules of the program; and reviewing requests from Rural Health Care Program participants seeking relief as expeditious as possible given staff resources.

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Misc.

- The FCC released items on December 13, 2018, which were adopted at its December 12, 2018 [Open Meeting](#), including: a [Report and Order, FNPRM, and Order on Reconsideration](#) on rate-of-return USF reform; a [Second Report and Order](#) to create a comprehensive database to enable callers to verify whether a telephone number has been disconnected before calling that number, thereby helping to protect consumers with reassigned numbers from receiving unwanted robocalls; a [Declaratory Ruling](#) that classifies SMS and MMS wireless messaging as information services to help prevent consumers from receiving spam robotexts; and an [NPRM](#) initiating the 2018 Quadrennial Review of certain broadcast ownership rules. The FCC also adopted the following items: a [Report and Order](#) adopting rule changes for the Upper 37, 39 and 47 GHz bands and provides for an incentive auction mechanism to offer contiguous blocks of spectrum in the Upper 37 GHz and 39 GHz bands and additional spectrum in the 47 GHz band; and a [Report](#) consolidating several previously separate Commission reports into a single report on the state of the broader communications market in the United States.

- The FCC [announced](#) on December 11, 2018, it deleted from the December 12, 2018 Open Meeting [agenda](#) the [Report and Order](#) that will eliminate certain rules which require local posting and maintenance of broadcast licenses and related information in specific locations. The FCC said it already adopted the item.
- The FCC issued a [News Release](#) on December 12, 2018, announcing Commissioner Rosenworcel sent [letters](#) to major phone companies calling on them to offer free robocall blocking solutions to consumers across the country. She said “There are call identification and blocking technologies that are available right now, which some service providers make available at no cost. It is time for every consumer to be able to access these tools for free and stop the incredible surge in these nuisance calls.” The letters ask the companies to provide her with a description of any tools they offer today, including a description of the costs charged.
- The Professional Association for Customer Engagement and Noble Systems [met with](#) Chairman Pai’s Advisor on December 6, 2018, to provide an update on efforts of the PACE-led Communication Protection Coalition to identify and document best practices across the telecommunications ecosystem that will reduce illegal communications while protecting legal communications. They said the CPC intends to issue a report of its recommendations in the first half of 2019. They also discussed the potential costs associated with a reassigned number database, asserting the FCC’s proposal to move all the existing database solutions under one central repository carries potential for high prices by eliminating competition among database providers.
- The FCC [published](#) in the Federal Register on December 11, 2018, the October 17, 2018 [Report and Order](#) that allowed all carriers to use the simpler jurisdictional separations processes previously reserved for smaller carriers, by harmonizing its Part 36 rules with the Commission’s previous amendments to its Part 32 accounting rules. The Order is effective January 1, 2019.
- No replies were filed on an [application](#) filed by Robert L. Hart and STEL-CO, requesting consent for the transfer of control of Le-Ru Telephone and its wholly-owned subsidiary, Le-Ru Long Distance Company, from Mr. Hart to STEL-CO. [Public Notice](#)
- To date, no comments were filed on an [application \(supplement\)](#) filed by Curtis H. Hunt and Herman C. Roark (Transferors) and Hilliary Acquisition B2B (Transferee) for transfer of control of Border to Border Communications from Transferors to Hilliary. Replies are due December 20, 2018. [Public Notice](#)
- The FCC [announced](#) on December 11, 2018, the official opening of the Office of Economics and Analytics. The FCC said this new office will help incorporate economic and data analysis into the policy-making work of the agency, and will include four divisions: the Economic Analysis Division; the Industry Analysis Division; the Auctions Division; and the Data Division.
- No comments were filed on Hadlo Technologies’ application seeking authorization to obtain NANP telephone numbers directly from the Numbering Administrators for its iVoIP service. [Public Notice](#)

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Upcoming Filing Dates

- Dec. 18 - Oppositions due to SDN’s direct case in the proceeding on the appropriate benchmark rate for SDN’s interstate switched access service that is contained in its tariff revisions filed on September 17, 2018. [Order](#)
- Dec. 18 - Comments due on TracFone’s [Petition](#) for an Order directing USAC to alter the implementation of the Lifeline National Verifier and a waiver of section 54.410, as well as a new rulemaking to develop new Lifeline policies. Replies are due December 26, 2018. [Public Notice](#)
- Dec. 20 - Replies due on Sunset Digital Communications’ [Petition](#) seeking ETC designation in Tennessee and Virginia for the purpose of receiving CAF Phase II support. [Public Notice](#)

- Dec. 20 - Replies due on an [application \(supplement\)](#) filed by Curtis H. Hunt and Herman C. Roark (Transferors) and Hilliary Acquisition B2B (Transferee) for transfer of control of Border to Border Communications from Transferors to Hilliary. [Public Notice](#)
- Dec. 24 - PRA comments due on an extension of a currently approved information collection regarding section 51.803, Procedures for Commission Notification of a State Commission's Failure to Act and Supplemental Procedures for Petitions Pursuant to section 252(e)(5). [FR](#)
- Dec. 26 - Replies due on TracFone's [Petition](#) for an Order directing USAC to alter the implementation of the Lifeline National Verifier and a waiver of section 54.410, as well as a new rulemaking to develop new Lifeline policies. [Public Notice](#)
- Dec. 27 - PRA comments due on the information collection required by the Improving Rural Call Quality and Reliability Act of 2017, which requires the FCC to establish a registry for intermediate providers and requires intermediate providers to register with the FCC before offering to transmit covered voice communications. [Notice](#)
- Dec. 27 - Comments due on USTelecom, CTIA, and ITTA's [Petition](#) for a one-time waiver of section 54.420, which requires completion of a biennial audit. Replies are due January 3, 2019. [Public Notice](#)
- Jan. 3 - Replies due on USTelecom, CTIA, and ITTA's [Petition](#) for a one-time waiver of section 54.420, which requires completion of a biennial audit. [Public Notice](#)
- Jan. 4 - PRA comments due on a revision of a currently-approved information collection regarding pole attachment complaint procedures. [Notice](#)
- Jan. 7 - Comments due on issues raised in the [NPRM](#) on promoting telehealth in rural areas related to determining the urban and rural rates used to calculate support in the Telecommunications Program within the Rural Health Care Program. Replies are due January 21, 2019. [Public Notice](#)
- Jan. 14 - Comments due on the Second FNPRM and FNPRM that accompanied the [Report and Order](#) that allows certain RLECs that receive fixed high-cost support to transition from RoR regulation to incentive regulation for their business data services. Reply comments are due February 12, 2019. [FR](#)
- Jan. 21 - Replies due on issues raised in the [NPRM](#) on promoting telehealth in rural areas related to determining the urban and rural rates used to calculate support in the Telecommunications Program within the Rural Health Care Program. [Public Notice](#)
- Feb. 12 - Replies due on the Second FNPRM and FNPRM that accompanied the [Report and Order](#) that allows certain RLECs that receive fixed high-cost support to transition from RoR regulation to incentive regulation for their business data services. [FR](#)

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