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No. 17-05

MAY 31, 2017

Regulatory Review

The Miller Isar, Inc. Regulatory Review is a monthly report designed to provide clients with information regarding regulatory and policy matters that may impact their business operations. The Regulatory Review is provided for informational purposes only and does not constitute legal opinion or counsel.

FEDERAL REGULATORY NEWS



BUSINESS DATA SERVICES REPORT AND ORDER RELEASED

On April 28, 2017, the Commission released a [Report and Order](#) on business data services (BDS, formerly private line services), adopted during its April 20, 2017 Open Meeting. The Report and Order streamlined former requirements for incumbent local exchange carriers based on a recognition of wide spread competition in the BDS market. The Commission also establishes a new BDS regulatory framework that minimizes government intervention to bring new technologies, products and services to businesses and consumers.

COMMISSION RELEASES BROADBAND INTERNET ACCESS SERVICES NPRM

On May 23, 2017, the Commission released its Open Internet [Notice of Proposed Rulemaking](#) (NPRM) adopted at its May 18, 2017 [Open Meeting](#). The NPRM propose to return broadband Internet access services to Title I information service regulation; to return to the Commission’s original classification of mobile broadband internet access service as a private mobile service; and requests comment on the existing rules governing Internet Service Provider practices. Comments are due July 17, 2017 and replies are due August 16, 2017. (Docket No. 17-108) [Commissioner Pai Statement](#), [Commissioner Clyburn Statement](#), [Commissioner O’Reilly Statement](#), [News Release](#)

CLYBURN DEPARTURE COULD UNDERMINE PAI AGENDA

There is growing concern over Commissioner Clyburn’s potential departure from the Commission when her term ends in June. According to reports, Commissioner Clyburn could leave the Commission upon the termination of her term, leaving Commissioners Pai and O’Reilly without a quorum. Her departure, coupled with a protracted replacement process could lead to an extended period where the Commission may be unable to act on much of Chairman Pai’s agenda. Commissioner Clyburn has the option of remaining until the end of the current Congress if no replacement is named.

SMALL ENTITY REGULATORY FEE GUIDANCE ISSUED

On May 17, 2017, the Commission issued a [Small Entities Compliance Guide](#) as an aid on compliance with assessment and collection of fiscal year 2016 regulatory fees. Detailed information regarding the fiscal year 2016 regulatory fees is contained in the September 2, 2016 [Order](#) on Assessment and Collection of Regulatory Fees for Fiscal Year 2016. A schedule of regulatory fees is contained at the end of the Guide.

COMMISSION FISCAL YEAR 2018 BUDGET ESTIMATES SENT TO CONGRESS

On May 23, 2017, the Commission delivered its [fiscal year 2018 budget estimates](#) to Congress. The Commission requests \$322,035,000 in budget authority from regulatory fee offsetting collections, representing a decrease of \$17,809,000 or 5.2 percent from the FY 2017 level of \$339,844,000. A budget authority of \$111,150,000 is requested for the spectrum auctions program, representing a decrease of \$5,850,000 or 5 percent from the FY 2017 level of \$117,000,000. Staffing is estimated at 1,448 Full Time Equivalents (FTE's) for regulatory fee offsetting collections and the spectrum auctions program. This request represents a decrease of 102 FTEs or 6.6 percent from the FY 2017 enacted level of 1,550.

FAIRPOINT – CONSOLIDATED TRANSACTION APPROVED

On May 8, 2017, the Commission's Wireline Competition Bureau, International Bureau, and Wireless Telecommunications Bureau released a joint [Memorandum Opinion and Order](#) (MOO) approving the transfer of operating authorities from FairPoint Communications Inc. to Consolidated Communications Holdings, Inc., under a \$1.5 billion merger of the companies. According to the MOO, "We have carefully and thoroughly reviewed the record and conclude, on balance, that the potential public interest benefits of the transaction outweigh the potential for public interest harms. The Applicants have no overlapping service areas and we find that the transaction will result in some cost savings, improved service quality, and enhanced broadband services." No petitions to deny the transaction or comments in opposition were received. (WC Docket No. 16-417)

3Q17 USF SUPPORT MECHANISM FUND SIZE PROJECTION FILED

On May 3, 2017 the Universal Service Administrative Company (USAC) filed [Federal Universal Service Support Mechanisms Fund Size Projections](#) for the Third Quarter 2017. The High Cost Support Mechanism funding requirements are projected to be \$1.125 billion. ([Appendices](#) available on USAC's website). On May 24, 2017, USAC filed [revisions](#) to Fund size projections. The revised High Cost Support Mechanism funding requirements are projected to be \$1.115 billion.

REPLY COMMENTS ON CENTURYLINK TANDEM RATE REDUCTION STAY SUBMITTED

On May 11, 2017 reply comments regarding CenturyLink's [Petition](#) for Limited Stay of years six and seven of the Commission's intercarrier compensation transition in the 2011 USF/ICC Transformation Order for terminating access were filed. [ITTA](#) – The Voice of America's Broadband Providers agreed with the majority of commenters that the Commission should grant the Petition. ITTA noted that the few comments filed in opposition to the Petition were meritless. The group maintained that the confusion associated with the years six and seven terminating access rate transitions per section 51.907 of the Commission's rules may foster the competitive harm and arbitrage that the Commission's intercarrier compensation transition was designed to eliminate. [CenturyLink](#) said the majority of comments support the Petition and supplement the record regarding the irreparable harm that will follow if the stay is not granted. The incumbent claimed the oppositions actually support grant of the Petition because they exemplify one of the core reasons underlying the need for the stay, i.e., the fact that carriers throughout the industry are likely to take a variety of different approaches to the section 51.907(g) requirements in the year six annual tariff filing process. [Sprint](#) said commenters opposing the Petition have demonstrated the requested stay is both procedurally defective and contrary to the public interest, and should accordingly be denied. Sprint argued to the extent there is any confusion regarding application of sections 51.907(g) and (h), the Commission should expeditiously issue guidance that the term "affiliate" as used in the rules should be interpreted consistent with the definition of affiliate codified in section 3 of the Telecommunications Act (47 U.S.C. §153(1)). [Public Notice](#) Replies were also filed by [T-Mobile](#), [Wide Voice](#), and [HD Tandem](#)

COMMENTS SOUGHT ON POLE ATTACHMENT REFORM, COPPER RETIREMENT, BROADBAND REPORTING AND OPEN INTERNET COMPLAINT PROCEDURES

On May 16, 2016, the Commission [published](#) in the *Federal Register* the Notice of Proposed Rulemaking (NPRM) section of the [NPRM, NOI, and Request for Comment](#) released April 21, 2017 regarding removal of regulatory barriers to infrastructure investment. The NPRM seeks comment on pole attachment reforms, changes to the copper retirement and other network change notification processes, and changes to the section 214(a) discontinuance application process. Comments are due June 15, 2017; replies are due July 17, 2017.

Also on May 16, 2017, the Commission issued a [Notice](#) in the *Federal Register* seeking Paperwork Reduction Act (PRA) comments on an extension of a currently approved information collection associated with FCC Form 477- Local Telephone Competition and Broadband Reporting. PRA comments are due June 15, 2017.

And on May 16, 2016, the Commission also published a [Notice](#) in the *Federal Register* requesting PRA comments regarding extension of the previously approved formal complaint procedures for the Open Internet rules. The rules established a formal complaint process to address Open Internet disputes that cannot be resolved through the Commission's informal complaint system or alternative means. The rules further authorize any party to file a claim alleging that another party violated a rule and asking the Commission to rule on the dispute. Comments are due July 17, 2017.

NCTA - USTELECOM PETITION FOR DECLARATORY RULING ON BROADBAND SPEED DISCLOSURES

On May 15, 2017, NCTA – The Internet & Television Association and USTelecom filed a [Petition for Declaratory Ruling](#) asking the Commission for a ruling that confirms and clarifies federal regulatory broadband speed disclosures. The organizations asked the Commission to confirm that a broadband provider's description of speeds based on the average peak-hour metric complies with the Commission's transparency requirements and, unless and until broadband Internet access (BIAS) is no longer classified as a telecommunications service, that such a characterization of actual broadband performance is just and reasonable under section 201. They also asked the Commission to reaffirm BIAS providers may comply with the 2010 Open Internet Order's Transparency Rule through alternative disclosures beyond this safe-harbor approach.

NEW NUMBER PORTABILITY ADMINISTRATION CENTER TESTING BEGINS

On May 15, 2017, iconectiv, the new Local Number Portability Administrator (LNPA), began industry testing as part of the transition to the new Number Portability Administration Center (NPAC). In the first test phase, companies that access the NPAC via a direct service order administration (SOA) or local service management system (LSMS) interface can validate proper interfaces with the iconectiv NPAC, to be followed by service providers and service bureau testing. Testing is mandatory for companies with a direct SOA or LSMS interface to the NPAC and optional for all other groups. Optional testing will begin when mandatory testing is complete in the second half of 2017. Other phases include LTI GUI, group and round robin, ancillary services and data migration testing. Users are encouraged to register with the NPAC as soon as possible. Additional information is available at www.numberportability.com

COMMISSION RELEASES 2016 PERFORMANCE REPORT

On May 23, 2017, the Commission released its [Fiscal Year 2016 Annual Performance Report](#). The report summarizes Commission progress in fulfilling strategic goals and meeting its performance commitments contained in its fiscal year 2016 Annual Performance Plan. Included in the report was discussion regarding recent broadband initiatives, reforms to modernize the high-cost USF mechanisms to support broadband deployment, establishing a framework for the Connect America Fund Phase II competitive auction, launching the Mapping Broadband Health in America tool, conducting regional tribal training and consultation workshops, and modernizing and reforming the Lifeline program.

IN THE COURTS

D.C. CIRCUIT DENIES OPEN INTERNET ORDER PETITIONS FOR REHEARING

On May 1, 2017, the U.S. Court of Appeals for the D.C. Circuit issued an [Order](#) denying six [petitions for en banc rehearing](#) of the Commission's 2015 open internet [decision](#). The judges maintained that the action would be "unwarranted" given the Commission's plan to dismantle the order and its Title II approach for broadband services on its own. Judges Sri Srinivasan and David S. Tatel issued a concurring opinion, suggesting that an *en banc* review would be "particularly unwarranted at this point in light of the uncertainty surrounding the fate of the FCC's Order." The opinion noted that the Commission will soon consider a notice of proposed rulemaking to replace the existing Title II approach with a "markedly different one." "In that light, the *en banc* court could find itself examining, and pronouncing on, the validity of a rule that the agency had already slated for replacement," they noted. Circuit Judges Janice Rogers Brown and Brett M. Kavanaugh dissented from the denial of the petitions. Judge Brown pointed to the long-standing "light-touch" Internet regulation, as compelled by the Telecommunications Act of 1996, noting that when Commission regulation "went beyond a light touch, this Court intervened. However, the regulatory proposal now before the court seeks to end this longstanding consensus." In his dissent, Judge Kavanaugh said that net neutrality rule was "unlawful and must be vacated." He noted that Congress "did not clearly authorize the FCC to issue



the net neutrality rule... Congress has debated net neutrality for many years, but Congress has never enacted net neutrality legislation or clearly authorized the FCC to impose common carrier obligations on Internet service providers.” Judge Kavanaugh maintained that the net neutrality rule violated the First Amendment to the Constitution, which he said “bars the government from restricting the editorial discretion of Internet service providers, absent a showing that an Internet service provider possesses market power in a relevant geographic market.” The Commission “has not even tried to make a market power showing,” Judge Kavanaugh said, concluding that the rule violated the First Amendment. The Commission considered release of a Notice of Proposed Rulemaking at its May 18 meeting, proposing reclassifying broadband Internet access service as an information service subject to “light-touch” regulation under Title I of the Communications Act. Chairman Pai stated that the opinion, “is important going forward, however, because it makes clear that the FCC has the authority to classify broadband Internet access service as an information service, as I have proposed to do,” noting further, “I also agree with many of the points made by Judges Brown and Kavanaugh in their compelling opinions explaining why the Commission’s Title II Order was unlawful.” [Chairman Pai](#) and [Commissioner O’Rielly](#) statements. *United States Telecom Association v. FCC* (case 15-1063)

NINTH CIRCUIT TO REHEAR COMMON CARRIER EXEMPTION CASE *EN BANC*

The U.S. Court of Appeals for the Ninth Circuit (San Francisco) has decided to rehear a case involving Federal Trade Commission (FTC) authority over non-common-carrier operations of companies that also serve as common carriers *en banc*. In 2014, the FTC alleged that AT&T had engaged in unfair and deceptive marketing practices by “throttling” wireless broadband customers with “unlimited” data plans. AT&T originally sought to have the suit dismissed by the U.S. District Court for the Northern District of California. The Company had argued that its status as a common carrier in its provision of wireless voice service entitled it to the common carrier exemption, even for the provision of wireless broadband service, which was not a common carrier service at the time. The FTC maintained that AT&T’s common carrier exemption only applied when an entity is engaged in the provision of a common carrier service. The district court rejected AT&T’s motion for dismissal, and AT&T appealed. In 2016, the Ninth Circuit rejected the FTC’s argument, concluding that “the language and structure of the FTC Act that the common carrier exception is a status-based exemption and that AT&T, as a common carrier, is not covered by section 5” of the Act that prohibits unfair methods of competition and unfair or deceptive business practices (“*Federal Trade Commission v. AT&T Mobility LLC*” (case 15-16585)). The FTC had sought *en banc* review of the panel’s decision. Ninth Circuit Chief Judge Sidney Thomas released an order for rehearing, noting, that the 2016 decision by the Court’s three-judge panel, “shall not be cited as precedent by or to any court of the Ninth Circuit.” Some maintain that the 2016 panel ruling had created a potential enforcement gap following the Commission’s recent removal of broadband privacy rules. Additionally, it is believed that with Commission reclassification of broadband Internet access as an information service - a non-common-carrier service - no agency would have authority to oversee Internet service providers that are also common carriers in their other activities. The Court’s decision to review the case was supported by Chairman Pai. [The Hill](#) notes that “if the Ninth Circuit decision is upheld after the court rehears the case, repealing the net neutrality rules won’t be enough to restore the FTC’s authority over broadband companies. That would likely require an act of Congress.”

SPRINT AND WINDSTREAM PETITION TO OVERTURN BDS REPORT AND ORDER

On May 8, 2017, Sprint Corp. and Windstream Services LLC filed a [Petition for Review](#) with the U.S. Court of Appeals for the District of Columbia Circuit, asking the Court to overturn the Commission’s April 28, 2017 [Report and Order](#) addressing the regulation of business data services (BDS). The Report and Order had found that there is strong competition in the BDS market and revised the Commission’s BDS regulatory framework by eliminating *ex ante* price regulation of packet-based BDS and transport services and legacy time division multiplex (TDM) services in counties that “deemed competitive,” following a transition period. Sprint and Windstream characterized the BDS order as “arbitrary, capricious, and an abuse of discretion; violates the notice-and-comment requirements of the Administrative Procedure Act; violates other federal laws including, but not limited to, the Communications Act of 1934 (as amended), the Commission’s regulations, and the Constitution; and is otherwise contrary to law.”

BEFORE CONGRESS

SENATE LEGISLATION WOULD NULLIFY FCC OPEN INTERNET ORDER

On May 1, 2017, Senator Mike Lee (R-UT) issued a [press release](#) to announce that he and eight other senators had introduced the “Restoring the Internet Freedom Act,” bill. The bill would nullify the Commission’s 2015 Open Internet [Order](#) and prohibit the Commission from issuing a similar set of rules in the future. Co-sponsors include Senators John

Cornyn (R-TX), Tom Cotton (R-AR), Ted Cruz (R-TX), Ron Johnson (R-WI), Rand Paul (R-KY), Thom Tillis (R-NC), Ben Sasse (R-NE) and James Inhofe (R-OK).

SENATE BILL SEEKS COLLECTION OF VALID AND DETAILED BROADBAND COVERAGE DATA

On May 11, 2017, Senator Joe Manchin (D-WV) issued a [Press Release](#) to announce that he and Senators Roger Wicker (R-MS), Brian Schatz (D-HI), Deb Fischer (R-NE) and Jerry Moran (R-KS) had introduced the “Rural Wireless Access Act of 2017” Under the bill the Commission would be required to collect broadband coverage data that is valid, consistent and robust. Manchin said “[t]his legislation is an important step towards ensuring our ongoing efforts to close the broadband gap are guided by a realistic understanding of the mobile broadband coverage currently available to rural consumers.”

“BROWSER” PRIVACY MEASURE GIVES FTC ISP INFORMATION USAGE OVERSIGHT

Representative Marsha Blackburn (R - TN), chair of the House communications and technology subcommittee, has introduced HR 2520, the Balancing the Rights of Web Surfers Equally and Responsibly Act (BROWSER Act), a bill that would require broadband Internet access service and edge service providers (ISPs) to give their users clear notification of their privacy policies and choices about the use of their information. Under the bill, providers would have to use an opt-in method of obtaining user consent for use or sale of sensitive information including information regarding online communications, web browsing, or app usage. The bill would authorize the Federal Trade Commission (FTC) to enforce abuses by broadband Internet access service providers, currently exempt from FTC enforcement under the FTC Act's “common carrier exemption.” Web browsing history, the content of communications, app usage, Social Security numbers, and precise geo-location information would be considered “sensitive information,” in addition to categories that the FTC already treats as sensitive, such as financial information, health information, and information pertaining to children under the age of 13 years. State laws governing usage of user information by ISPs or edge providers would be preempted. The BROWSER Act is intended to address what has been viewed as a gap or lack of clarity regarding the privacy obligations of broadband ISPs, following enactment of a Congressional Review Act (CRA) resolution earlier this year. The CRA resolution annulled the Commission’s 2016 broadband ISP privacy rules and eliminated Commission authority to adopt “substantially similar” regulation in the future. Commission Chairman Ajit Pai, has maintained that there is no gap in Commission authority over ISP privacy obligations despite the CRA resolution, because the underlying statutory provisions in section 222 of the 1934 Communications Act, as amended, still apply. A notice of proposed rulemaking adopted by the Commission on May 17, 2017 would reverse the Commission’s 2015 decision to classify broadband Internet access service as a telecommunications service subject to Title II of the Act.

STATE REGULATORY NEWS



GEORGIA – UAF Surcharge Adopted

On May 16, 2017, the Georgia Public Service Commission approved an amended state Universal Access Fund (UAF) contribution factor of 4.9 percent of quarterly state revenue. All Certificate of Public Convenience and Necessity holders are subject to the UAF assessment, which is due quarterly. The new rate becomes effective July 1, 2017 and first payment is due October 30, 2017 for the quarter ending September 30, 2017. (Docket No. 32235.)

OREGON – House Passes Disputed Tax Interest Payment Bill

The Oregon House has passed [House Bill 2407](#) a measure to impose interest on disputed tax debts. Under the measure, companies disputing taxes in excess of \$1M would be subject to interest payments on disputed amounts pending dispute resolution. The bill is specifically aimed at Comcast, which has had an ongoing eight year tax dispute with the state totaling \$147M.

PENNSYLVANIA – TRS Surcharge to Remain Unchanged

The Pennsylvania Public Utility Commission has approved retention of the current \$0.04 per line per month telecommunications relay service surcharge for incumbent and competitive local exchange carrier commercial and residential subscribers beginning July 1, 2017, through June 30, 2018. The monthly surcharge is used to fund three

programs: the TRS program, the Telecommunications Device Distribution Program, and the Print Media Access System Program. (Docket M-2017-2582552)

UTAH – Per-Connection USF Surcharge Rulemaking Initiated

The Utah Public Service Commission has initiated a rulemaking proceeding to implement state law that addresses how the Utah Universal Public Telecommunications Service Support Fund (UUSF) may be funded. Under SB 130 enacted in March, a UUSF surcharge would be applied to the number of access lines maintained by a provider. The UUSF is currently funded through a surcharge applied to each provider's billed intrastate retail rates. The new surcharge would be assessed on all providers that facilitate telecommunications services, including providers using voice-over-Internet protocol (VoIP) technology. Utah Administrative Code R746-360-5 is to be amended to include the new surcharge amount and method of recovery. Base on initial comments, the Commission decided “to move forward with a rule change that will fund the UUSF through a per-connection surcharge rather than through a revenue-based remittance, based on the location of a physical or billing address within Utah associated with an access line.” Under a draft rule, providers would remit 1.65% of billed intrastate retail rates through July 31, 2017. As of Aug. 1, 2017, providers would collect from end-users \$0.36 per month per access line from end users having a physical endpoint or address within the state of Utah. The surcharge would apply directly to each end-user as a separate charge and would not be included in, nor paid from, the provider's rates or telecommunications revenues. The Utah Office of Consumer Services and the Utah Rural Telecom Association (URTA), as well as CenturyLink, support commission to adopt a per-connection monthly UUSF fee. Comcast has urged delaying on UUSF collection until a full investigation is completed to determine the impact on subscribers and competitive neutrality of the approach. Comments on the proposed rules are due by July 3. (Docket 17-R360-01)

WEST VIRGINIA – New Law Prohibits Commission IP and VoIP Service Regulation

Governor Jim Justice (R) has signed SB 180, a bill that prohibits Public Service Commission jurisdiction of Internet protocol-enabled service and voice-over-Internet protocol-enabled service and transactions involving telephone company entities under common ownership into law. Under the new law, IP-enabled service is defined as “any service, capability, functionality, or application provided using Internet protocol, or any successor protocol, that enables an end user to send or receive a communication in Internet protocol format, or any successor format, regardless of whether the communication is voice, data, or video.” The new law defines VoIP as any service that “enables real-time two-way voice communications that originate or terminate from the user's location using Internet protocol or a successor protocol; and uses a broadband connection from the user's location.” The definition includes any service that “permits users to receive calls that originate on the public switched telephone network and to terminate calls on the public switched telephone network.” Additionally, the Commission is explicitly precluded from asserting jurisdiction over any transaction involving a telephone company if all entities involved in the transaction are under common ownership.

WEST VIRGINIA – Customer-Provided Conduit Rules Approved

On May 17, 2017, the West Virginia Public Service Commission adopted new rules regarding customer-provided conduit following enactment of Senate Bill 678 in 2016, which required the Commission to promulgate rules. Under the rules, a “telephone public utility” may not prohibit use of customer provided conduit or “other underground construction.” The rules also require coordination among multiple service providers when applicable. The new rules become effective August 1, 2017. [General Order No. 187.48](#)

COMPLIANCE REPORTING JUNE

COMPLIANCE REPORTING JUNE

The following report listing has been compiled from past reporting requirements and is provided exclusively for informational purposes. Reporting requirements are subject to change and should be verified by filers.

Geographic Rate Averaging and Rate Integration Certification letter were due on May 1.

FCC Form 395 - Common Carrier Annual Employment Report and Discrimination Complaint Report, May 31 (16 employees or more).

Companies should also anticipate the upcoming FCC International Report due July 31.

REPORTS DUE IN JUNE

Due Date	Jurisdiction	Report Name
June	Alaska	Access Minutes Report
June	Alaska	Carrier and Area Specific Bulk Billed Report
June	Missouri	Relay Missouri Statement
June	Rhode Island	Telecommunication Education Access Fund
June	Rhode Island	Telecommunications Relay Service Report
June 1	Idaho	ID Universal Service Fund Form
June 1	New Jersey	Statement of Gross Intrastate Revenues from Operations
June 1	Ohio	CLEC Data (Report)
June 1	South Dakota	South Dakota Public Utilities Commission Annual Report
June 1	Wyoming	Gross Intrastate Retail Revenue
June 9	California	Combined California PUC Telephone Surcharge Transmittal
June 10	Alaska	Alaska Telecommunications Relay Services Fund - Remittance of Surcharges Collected
June 10	Arkansas	State of Arkansas Universal Service Fund
June 10	California	Employee Compensation, Dues, and Subscriptions
June 10	New York	Service Quality Performance
June 15	Alabama	Revised Survey of Competitive Local Exchange Carriers
June 15	Florida	Florida Telecommunications Relay, Inc. (FTRI) Monthly Surcharge Collection Report
June 15	Georgia	Georgia Telecommunications Relay Service (TRS) Monthly Surcharge Collection Report
June 15	Kansas	Kansas Universal Service Fund 2004/2005 Wireless and Wireline Carrier Remittance Worksheet
June 15	Kentucky	Commonwealth of Kentucky Telecommunications Relay Service Fund Telecommunications Devices for the Deaf Distribution Fund
June 15	Kentucky	Commonwealth of Kentucky Universal Service Fund
June 15	Nebraska	Nebraska USF & E911 Remittance Worksheet
June 15	North Carolina	North Carolina Access Line Report - Rule 17-2(K)
June 15	North Carolina	Questions for Competing Carriers Report
June 15	Oklahoma	State of Oklahoma Universal Service Fund Carrier Remittance Worksheet
June 15	Pennsylvania	Pennsylvania Universal Service Fund, FY2004 Carrier Remittance Monthly Worksheet
June 15	Puerto Rico	Puerto Rico Universal Service Fund July 2004 - December 2004 Carrier Remittance Worksheet
June 15	Rhode Island	E911

Due Date	Jurisdiction	Report Name
June 15	South Carolina	The Public Service Commission of South Carolina SC Dual Party Relay System Invoice
June 15	Tennessee	Telecommunications Devices Access Program ("TDAP")
June 15	Vermont	Vermont Universal Service Fund Carrier Remittance Worksheet
June 15	Virginia	Telecommunications Relay Service Monthly Report
June 20	Alaska	State of Alaska Universal Service Fund Monthly Carrier Remittance Worksheet
June 20	Arizona	Arizona Universal Service Fund Carrier Remittance Worksheet
June 20	Colorado	CO Telecommunications Relay Service Surcharge
June 20	Idaho	Idaho Telecommunications Service Assistance Plan (ITSAP)
June 20	New Hampshire	Telecommunications Relay Service Remittance
June 20	Pennsylvania	Remittance Form for Monthly Telecommunications Relay Service (TRS) Surcharge Collections
June 20	Utah	Utah Universal Service Fund Surcharge Remittal Statement
June 20	Washington	Telecommunications Relay Service, Washington Telecommunications Assistance Program, and E911
June 21	New York	TAF Adjustment Input Form
June 21	New York	Targeted Accessibility Fund Monthly Online Reporting Form
June 21	Oregon	Residential Services Protection Fund Surcharge Remittance Form
June 22	Arkansas	Arkansas Intrastate Carrier Common Line Pool Report
June 25	Minnesota	Minnesota Annual 911/TAM/TAP Fees Report Form
June 25	Texas	Texas Universal Service Fund Worksheet
June 30	Arkansas	Arkansas Public Service Commission Service Performance Report
June 30	Connecticut	2004 Connecticut TRS Supplemental Data Collection
June 30	Mississippi	Mississippi Dual Party Fund Statement of Revenues
June 30	Nebraska	State of Nebraska Dual Party Relay Surcharge Form
June 30	North Carolina	Lifeline Report
June 30	Oregon	Oregon Telephone Assistance Program Reimbursement Form
June 30	Pennsylvania	Lifeline Report
June 30	Tennessee	Wireline Activity Tennessee-CCN Authority
June 30	Texas	CLEC/CTU Annual Information Reporting Requirements
June 30	Texas	IXC, PPC, and Other Uncertificated Nondominant Telecommunications Carriers Reporting Requirements
June 30	Vermont	Monthly Disconnect Report

Due Date	Jurisdiction	Report Name
June 30	Vermont	Vermont Service Quality Performance Index Report
June 30	Virginia	Service Quality Report
June 30	Wyoming	Telecommunication Companies Revenue & Assessment Report (Wyoming Universal Service Fund)

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[Special Access Deregulation: What You Need to Know](#) By Andrew Regitsky, May 5, 2017 10:00:00 AM On April 28, 2017 the FCC released the text of its Report and Order (Order) in Docket 17-43, capping the decade long proceeding by detariffing and eliminating pricing rules for most ILEC special access services. Price cap regulation will continue for ILEC DS1 and DS3 end user channel terminations only in counties that fail a competitive market test and are classified as non-competitive. CLECs will also have to detariff their special access services. The Order will become effective 60 days after it appears in the Federal Register. The industry has up to three years from the Order’s effective date to transition to the new detariffing requirements. Here are the important points special access suppliers and customers need to know: [Read more »](#)

[CenturyLink Seeks Stay of Tandem Transport Transition to Bill-and-Keep](#) By Andrew Regitsky, May 12, 2017 10:00:00 AM The 2017 Annual Access Filings are a month away as part of the movement of terminating access rates to bill-and-keep, price cap ILECs (and mirroring CLECs) are required to reduce their tandem-switched transport rates to \$0.0007 as the final interim step before reducing them to \$0.00 in 2018. Now, however, that expected reduction is in some doubt. [Read more »](#)

[Will “Bright-Line” Net Neutrality Rules Be Eliminated?](#) By Andrew Regitsky, May 19, 2017 10:00:00 AM By a 2-1 party line vote yesterday, the FCC voted to approve a Notice of Approved Rulemaking (NPRM) that will substantially remake regulations for the Internet. Although in theory the Commission has an open mind when it begins a new proceeding, in this Docket (17-108) it is no secret that the two Republican Commissioners plan on using their majority to reclassify broadband Internet access as a Title I information service and do away with the vague rule providing it with authority to regulate all ISP future Internet behavior. [Read more »](#)

[FCC’s BDS Competitive Market List Cannot Pass the Laugh Test](#) By Andrew Regitsky, May 26, 2017 10:00:00 AM On May 15, 2017 the FCC finally released the list of

competitive, non-competitive and grandfathered markets it identified in its Business Data Services (BDS) Report and Order (Order) in Docket 17-43. In that Order, the Commission decided to eliminate price cap regulation for ILEC DS1 and DS3 special access services in counties deemed “competitive,” and in counties that previously obtained Phase II pricing flexibility (grandfathered counties), while keeping price cap regulation on DS1 and DS3 channel terminations in “non-competitive” markets.

[Read more »](#)

LIGHT READING FROM CORPORATE COUNSEL DAILY UPDATE

Privacy Regulations and the Power of State AGs

Companies that handle sensitive personal information, both of consumers and of their employees, should be aware that... [READ MORE »](#)

Building Compliance Skills SEAL Style Compliance will always be a people business. You can have the regulatory framework down, understand the business, and... [READ MORE »](#)