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## Regulatory Review

*The Miller Isar, Inc. Regulatory Review is a monthly report designed to provide readers 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 legal counsel.*

### FEDERAL NEWS



#### USTELECOM UNE-RESALE FORBEARANCE PETITION GRANTED

On August 2, 2019, the Commission issued a [memorandum opinion and order](#) granting the last two rule forbearance requests in USTelecom’s 2018 [petition for forbearance](#). Citing to significant competition, the Commission granted USTelecom’s request to forbear from regulations requiring price cap regulated incumbent local exchange carriers to make unbundled network element (UNE) analog loops available to competitors at avoided-cost. The Commission also granted forbearance on price cap regulated incumbent local exchange carrier service resale obligations. The Commission based its decision on data reflecting the level of competition, with a focus on IP-based voice and wireless services, finding that “reliance on UNE Analog loops (and other unbundled network loops) has not just declined in relative terms, but absolutely. Over just one year, from June 2016 to June 2017, voice subscriptions relying on unbundled loops dropped from 2.6 million to 1.8 million, a more than 30% drop. Indeed, competitive local exchange carriers (CLECs) who use UNE Analog Loops admit that they—and their customers—have alternative options at lower cost.” According to the Commission “...perhaps the greater cost comes from the disincentive that continued unbundling mandates create for competitors to invest in their own facilities-based networks and transition their customers to next-generation services.” The Commission goes on to note that “certain regulatory protections remain to guard against unjust and unreasonable rates for price cap LEC voice telecommunications services. These include section 251(b)(1) resale availability; the prohibitions against unjust and unreasonable charges and unjustly or unreasonably discriminatory practices in sections 201 and 202 of the Act and the complaint process under section 208 of the Act; section 214 legacy voice service discontinuance oversight; and Eligible Telecommunications Carrier requirements to offer voice telephony at rates reasonably comparable to national average urban rates...” The Commission also predicated its forbearance on public policy goals of promoting broadband deployment. A transition period was adopted to allow CLECs to find service and network alternatives. CLECs may order UNE analog loops for an additional six months and have three years to transition UNE-based subscribers to “alternative arrangements” – alternative TDM facilities or IP-based voice services. The three-year period also applies to transition the loop portion of enhanced extended loops and DS1 circuits. Incumbent UNE rates are to remain at regulated rates though CLECs and price cap regulated incumbents may negotiate for replacement arrangements at market-based rates. The same transition periods apply to resold services at avoided cost discounts. Commissioner Rosenworcel dissented from the decision, stating that the Commission’s action could harm consumers who still rely on legacy TDM services. Commissioner Starks also dissented in part consistent with competitive industry arguments – that the order “ignores the value of (intramodal) competition.” [news release](#) (WC Docket 18-141)

## **PRICE CAP REGULATED ILEC BDS FORBEARANCE ORDER EFFECTIVE SEPTEMBER 6**

On August 7, 2019, the Commission published a [notice](#) in the *Federal Register* announcing that its July 12, 2019 [report and order on remand](#) granting price cap regulated incumbent local exchange carriers relief from *ex ante* pricing regulation for lower speed TDM transport business data services becomes effective September 6, 2019. A [public notice](#) publicly released the list of common language location identification codes of price cap incumbent local exchange carrier wire centers subject to the forbearance granted in the July 12, 2019 report and order on remand. The bureau said it received no objections to its [announcement](#) on releasing this list. (WC Docket Nos. 16-143, 05-25, 18-141, GN Docket No. 13-5, and RM-10593).

## **FCC FORM 477 SUBMISSIONS DUE SEPTEMBER 3**

On August 9, 2019, the Commission's Office of Economics and Analytics issued a [public notice](#), to announce that the filing deadline for FCC Form 477 is September 3, 2019. The Form is to contain data as of June 30, 2019. The FCC Form 477 filing interface is available at this [link](#). Filing information on how to file Form 477 can be found [here](#).

## **FRAUD DIVISION NOW OFFICIAL**

The Commission's Enforcement Bureau Fraud Division has been officially formed following [Federal Register](#) publication of the Commission's [order](#) creating the Division, effective August 13, 2019. The new division is tasked with investigating and prosecuting Universal Service Fund fraud. It will collaborate with the Commission's Office of Inspector General, the U.S. Department of Justice and other law enforcement agencies to prosecute unlawful conduct.

## **CALLER ID ORDER RELEASED**

On August 5, 2018, the Commission released its [Second Report and Order](#) amending truth in caller ID rules. According to the Commission, "The Truth in Caller ID Act of 2009 prohibits anyone from causing a caller ID service to knowingly transmit misleading or inaccurate caller ID information ("spoofing") with the intent to defraud, cause harm, or wrongly obtain anything of value. However, until passage of the RAY BAUM'S Act last year, the Truth in Caller ID Act did not extend to text messages or international calls. The new rules extend these prohibitions to text messages, calls originating from outside the United States to recipients within the United States, and additional types of voice calls, such as one-way VoIP calls." [Press Release](#) [Pai Statement](#) [O'Rielly Statement](#) [Rosenworcel Statement](#) [Starks Statement](#) (Docket Nos. 18-335 11-39).

## **SECTION 706 NOI CIRCULATED**

On August 2, 2018, the Commission [circulated](#) an "Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, Notice of Inquiry."

## **TOLL FREE NUMBER EXPERIMENTAL AUCTION SCHEDULED FOR DECEMBER 17**

On August 1, 2019, the Commission [announced](#) that the date for its experimental auction of numbers in the new 833 toll free NPA is December 17, 2019. The Commission noted that for the first time, it will be using an auction mechanism to assign toll free numbers. The auction will include approximately 17,000 numbers in the 833 toll free code for which there have been multiple, competing requests. [Pai Statement](#), [O'Rielly Statement](#). On August 2, 2019, the Commission released a [Public Notice](#) adopting procedures to be used in the 833 experimental auction pertaining to: Application requirements, including disclosures and certifications, as well as prohibitions and restrictions on applicants, which will promote auction integrity; Bidding procedures, including upfront payments, bidding format and period, and payments due in case of default; and Post-auction procedures, including payment deadlines and toll free number reservation requirements. (AU Docket No. 19-101; WC Docket No. 17-192; CC Docket No. 95-155)

## **TOLL FREE NUMBER AUCTION INFORMATION COLLECTION PRA COMMENT DEADLINES SET**

On August 7, 2019, the Commission published a [notice](#) in the *Federal Register* requesting Paperwork Reduction Act comments regarding new information collection associated with participation in the 833 toll free NPA number auction. The Commission seeks emergency review and approval for use of the new FCC Form 833 to be used by companies to apply for access. The Form will be used to determine if an applicant is qualified to bid in the auction. Comments are due September 6, 2019. A separate *Federal Register* [notice](#) also seeks PRA comments on letters of authorization to be used in verifying the relationship between a responsible organization and a potential subscriber, and on collecting data on secondary market transactions. PRA comments are due October 7, 2019.

## **CENTURYLINK SETTLES CRAMMING INVESTIGATION**

On August 13, 2019, the Commission's Enforcement Bureau issued an [order](#) that approves a Consent Decree with CenturyLink, resolving the Bureau's investigation into whether CenturyLink placed unauthorized third-party charges on customer wireline telephone bills. The Bureau initiated its investigation following customer cramming complaints alleging that they had been assessed unauthorized charges on CenturyLink bills for long distance services from various third-party resellers, and claimed they had difficulty getting timely refunds. CenturyLink agreed to pay a \$550,000 settlement to the United States Treasury and agreed to discontinue third-party billing arrangements, with limited exceptions, and to implement a process for providing refunds or credits to customers with valid complaints about unauthorized charges. [news release](#) (File No. EB-TCD-16-00022562)

## **COMMISSION ISSUES DIGITAL OPPORTUNITY DATA COLLECTION ORDER-FNPRM**

On August 6, 2019 the Commission released the [Report and Order and Second Further Notice of Proposed Rulemaking](#) regarding a new Digital Opportunity Data Collection adopted at the Commission's August 1, 2019 Open Meeting. The new data collection is intended to enhance broadband deployment data accuracy. Digital Opportunity Data Collection is distinct from the existing Form 477 collection and will gather geospatial broadband service availability data specifically targeted toward advancing universal service goals. All broadband service providers are to submit granular maps of the areas where they have broadband-capable networks and make service available. According to the Commission, "The order '[a]dopts a process to collect public input on the accuracy of service providers' broadband maps, facilitated by a crowd-sourcing portal that will gather input from consumers as well as from state, local, and Tribal governments." The Second Further Notice of Proposed Rulemaking requests comment on how best to incorporate mobile wireless coverage data into the Digital Opportunity Data Collection and how to improve satellite broadband reporting. Commissioners Rosenworcel and Starks partially dissented, expressing concerns including the appropriateness of designating the Universal Service Administrative Co. to oversee the new Digital Opportunity Data Collection mechanism and exclusion of pricing information.

On August 22, 2019, the *Report and Order* was [published](#) in the *Federal Register*. The order becomes September 23, 2019, except for paragraphs 44 through 51 and 57 through 65 of the order and sections 54.1401 and 54.1402(b) and (c), (d)(2) and (e), which are delayed. The accompanying *Second Further Notice of Proposed Rulemaking* was also published in the *Federal Register* on August 22. Comments are due September 23, 2019; replies are due October 7, 2019. Paper Work Reduction Act comments on the information collection are due October 21, 2019. (WC Docket Nos. 19-195 and 11-10)

## **LOCAL COMPETITION INFORMATION COLLECTION PAPER WORK REDUCTION ACT COMMENTS DUE SEPTEMBER 23**

On August 22, 2019, the Commission published a [notice](#) in the *Federal Register* requesting Paperwork Reduction Act comments on an extension of a currently approved collection associated with sections 251 and 252 regarding local competition. Comments are due September 23, 2019.

## **COMMISSION RELEASES FY 2019 REGULATORY FEES ORDER**

On August 27, 2019, the Commission released a [report and order and further notice of proposed rulemaking](#) adopting a schedule of regulatory fees. The Commission expects to assess and collect \$339,000,000 in regulatory fees for fiscal year 2019. A fiscal year 2019 schedule of regulatory fees appears at appendix C of the report and order. The Commission adopted the regulatory fee

regime proposed in a notice of proposed rulemaking released in May. Regulatory fee payments are due September 30, 2019. The Commission increased the DBS fee rate to \$0.60 per subscriber so that the DBS fee approaches the cable television/IPTV fee, based on the Media Bureau full-time equivalents devoted to issues that include DBS; and implemented a new methodology for calculating the full power broadcast television regulatory fees based on an average of the actual population and the Designated Market Groupings, which the Commission adopted in FY 2018. The Commission also amended its rules to implement RAY BAUM'S Act, detailing the Act's modifications to section 9 and the new section 9A. "Section 9(e)(2) of the RAY BAUM'S Act permits the Commission to exempt a party from paying regulatory fees if 'in the judgment of the Commission, the cost of collecting a regulatory fee established under this section from a party would exceed the amount collected from such party. . . .' In the FY 2019 NPRM, we sought comment on how to implement section 9(e)(2) and on a proposed section 9(e)(2) *de minimis* fee exemption of \$1,000," the Commission noted. The report and order adopted the \$1,000 *de minimis* exemption. "Based on these allocations and the requirement to collect \$339,000,000 in regulatory fees this year, we project collecting approximately \$25.39 million (7.49%) in fees from International Bureau regulatees; \$85.15 million (25.12%) in fees from Wireless Telecommunications Bureau regulatees; \$106.64 million (31.46%) from Wireline Competition Bureau regulatees; and \$121.82 million (35.93%) from Media Bureau regulatees," the FCC said. The order becomes effective upon publication in *the Federal Register*. The Further Notice of Proposed Rulemaking seeks comment on proposals to amend the Commission's schedule of regulatory fees for FY 2020.

On August 30, 2019, the Commission released a [public notice](#), announcing opening of the Commission's automated filing and payment system for fiscal year 2019 regulatory fees. Fee payments are due September 24, 2019. The Commission noted that although the regulatory fees would not become effective until the August 27, 2019 report and order and further notice of proposed rulemaking is published in the *Federal Register*, regulatees could submit payments at any time before the effective due date. Also on August 30, 2019, the Commission issued an [erratum](#) to its report and order and further notice of proposed rulemaking amending paragraph 1, third sentence of the order to read "[t]hese regulatory fees are due in September 2019." Comments are due September 30, 2019, 30 days following Federal Register publication; replies are due 60 days after publication. (MD Docket No. 19-105)

#### **COMMISSION IMPLEMENTS KARI'S LAW AND RAY BAUM'S ACT 911 RULES**

On August 1, 2019, the Commission adopted a *Report and Order* implementing Kari's Law and RAY BAUM'S Act pertaining to direct 911 access from multiline telephone systems (MLTS). Kari's Law, named after a woman murdered by her estranged husband in 2013 in a Texas motel room while her young daughter was prevented from calling 911 because she didn't dial "9" first, requires multi-line telephone systems to enable users to dial 911 directly, without having to dial a prefix (such as a '9') to reach an outside line. Kari's Law also requires MLTS to provide notification, such as to a front desk or security office, when a 911 call is made in order to facilitate building entry by first responders and requires MLTS equipment manufactured, imported, sold, leased, or installed after February 16, 2020, to be capable of enabling users to dial 911 directly without first dialing a prefix. The Commission said that, "The new rules provide clarity and specificity to these statutory requirements so that companies can effectively meet their legal obligations." Section 506 of RAY BAUM'S Act requires the Commission to adopt rules requiring that 'dispatchable location information,' including street address, floor level, and room number of a 911 caller, "is conveyed with 911 calls, regardless of the technological platform used, so that first responders can be quickly dispatched to the caller's location," the news release observed. "The new rules apply dispatchable location requirements to multi-line telephone systems, fixed telephone service, interconnected Voice over Internet Protocol (VoIP) services, Telecommunications Relay Services, and mobile texting services. Mobile wireless services are already required to provide either dispatchable or coordinate-based location information with 911 calls," the FCC said. The order also consolidates the Commission's 911 rules from multiple rule sections into a single rule section. In September 2018, the Commission released a *Notice of Proposed Rulemaking*, proposing the rules adopted under the *Report and Order*. Commissioners Jessica Rosenworcel and Geoffrey Starks dissented in part from the *Report and Order*, arguing that some provisions should have been more stringent. [Pai Statement](#); [O'Rielly Statement](#); [Carr Statement](#), [Rosenworcel Statement](#), [Starks Statement](#). [Release](#) (PS Dockets Nos. 18-261 17-239, 11-117)

#### **CALLER ID ORDER BECOMES EFFECTIVE FEBRUARY 5, 2020**

On August 30, 2019 the Commission's [second report and order](#) amending the Truth in Caller ID was [published](#) in the *Federal Register*. Following publication, the *Second Report and Order* becomes effective February 5, 2020. The *Second Report and Order* revised caller ID spoofing rules to cover communications originating outside the United States directed at recipients

within the United States, expanded the scope of communications covered by its caller ID spoofing rules, and adopted a number of definitions, including text message, text messaging service and voice service, among other things. The amendments implement the anti-spoofing provisions of the RAY BAUM'S Act.

#### **RURAL DIGITAL OPPORTUNITY FUND NPRM RELEASED**

On August 2, 2019, the Commission released a [Notice of Proposed Rulemaking](#), proposing establishment of a new Rural Digital Opportunity Fund (RDOF). The Commission seeks comment regarding a \$20.4 billion RDOF commitment over the next ten years to “bring broadband service at minimum speeds of 25/3 Mbps to millions of Americans living in the areas that need it most—including those living on Tribal lands.” According to the Commission, “our two-phase approach will ensure that completely unserved areas are prioritized, so that support can begin to flow quickly while we work to improve the data needed to most efficiently target support over the longer term. At the same time, by awarding support through a competitive bidding mechanism and targeting investment to areas where there is currently no private sector business case to deploy broadband without assistance, the Commission will ensure that its limited universal service support is awarded in an efficient and cost-effective manner, without overbuilding to areas that already have service.” The proposals include measures to require accountability to ensure that the Commission’s investments “are used wisely to deliver intended results.” Commissioners Rosenworcel and Starks partially dissented, raised concerns about support distribution without completing improvements to the FCC’s broadband data collection. Commissioner Rosenworcel also criticized the RDOF proposal for being too modest in its goals. (WC Docket Nos. 19-126 and 10-90)

#### **INTERNET ACCESS AND VOICE TELEPHONE SERVICE REPORTS RELEASED**

On August 28, 2019 the Commission’s Office of Economics and Analytics Industry Analysis Division released a report on [Internet Access Services](#) status as of December 31, 2017, and a separate report on [Voice Telephone Services](#), also as of December 31, 2017. The Internet Access Services Report, reflects Internet Access – defined by the FCC as Internet connections in service with more than 200 kilobits per second in one direction and reported through the FCC Form 477 – usage over time. According to the Report, total Internet connections increased by about 4% between December 2016 and December 2017 to 421 million. Mobile Internet connections increased 4.5% year-over-year to 313 million in December 2017, while fixed connections grew to 108 million – up about 2% from December 2016; In December 2017, 3% of fixed connections (or 3 million connections) were slower than 3 Mbps downstream, 11% (or 12 million connections) were at least 3 Mbps downstream but slower than 10 Mbps, 17% (or 18 million connections) were at least 10 Mbps downstream but slower than 25 Mbps, 32% (or 34 million connections) were at least 25 Mbps downstream but slower than 100 Mbps, and 38% (or 41 million connections) were at least 100 Mbps. The companion Voice Telephone Report, also derived from the FCC Form 477 found that as of December 2017, the data shows that there were 50 million end-user switched access lines in service, 67 million interconnected VoIP subscriptions, and 340 million mobile subscriptions in the United States, or 456 million retail voice telephone service connections in total. Over the three-year period, interconnected VoIP subscriptions increased at a compound annual growth rate of 7%, mobile voice subscriptions increased at a compound annual growth rate of 2%, and retail switched access lines declined at a compound annual growth rate of 12% per year. Of the 116 million wireline retail voice telephone service connections (including both switched access lines and interconnected VoIP subscriptions) in December 2017, 60 million (or 52%) were residential connections and 56 million (or 48%) were business connections.

#### **NUMBERING UTILIZATION REPORT RELEASED**

On August 16, 2019, the Commission’s Office of Economics and Analysis released a [report](#) on numbering resource utilization. The report contains Numbering Resource Utilization and Forecast Report data as of March 16, 2018, and porting and toll-free data as of December 31, 2017.

#### **COMMISSION MAKES ITSP – CMRS REGULATORY DATA AVAILABLE**

On August 9, 2019, the Commission released a [public notice](#), announcing that fiscal year 2019 interstate telecommunications service provider and commercial mobile radio service data have been made publicly available. The data may be viewed at the

Commission's [electronic filing and payment system](#) (Fee Filer). Providers may access the Fee Filer system using their federal registration number and password.

### IN THE COURTS

#### **D.C. CIRCUIT REMANDS PARTS OF SMALL CELL DEPLOYMENT ORDER TO FCC APPEAL**

On August 9, 2019, the U.S. Court of Appeals for the D.C. Circuit released a [decision](#) regarding petitions for review of the Commission's March 2018 [second report and order](#). The *Second Report and Order* adopted new rules to streamline the wireless infrastructure siting review process. In its decision, the court concluded the Commission had failed to justify its determination that review of small cell deployments was not in the public interest to require. The court vacated a portion of the Commission's order that exempted small cells from environmental and historic preservation reviews, while affirming provisions dealing with tribal review under the National Historic Preservation Act (NHPA) and promulgation of the order itself. The order clarified that the deployment of small cells does not constitute a "federal undertaking" under the NHPA or a "major federal action" under the National Environmental Policy Act. Requests to vacate the order's changes to tribal involvement in a section 106 review and to vacate the order in its entirety were denied. Commissioner Carr issued a [statement](#) on the decision. *United Keetoowah Band of Cherokee Indians in Oklahoma et al. v. FCC* (Consolidated cases beginning with no. 18-1129)



#### **COMMISSION FILES BRIEF IN ONE-TOUCH MAKE READY POLE ATTACHMENT ORDER APPEAL**

On August 22, 2019, the Commission filed a [brief](#) with the U.S. Court of Appeals for the Ninth Circuit (San Francisco, CA) responding to [American Electric Power Corporation, et al.](#) and the [city of Portland, Oregon](#) petitions for review of Commission's August 3, 2018 pole attachment [report and order and declaratory ruling](#). The ruling had authorized carriers to make one-touch make-ready changes on most pole attachments when required, made further reforms to the pole attachment process, and concluded section 253(a) prohibits state and local moratoria on telecommunications facilities deployment. In its brief, the Commission provided the legal basis for its findings. (NOS. 18-72689 (L), 19-70490)

### STATE REGULATORY NEWS



#### **COLORADO – TRS Surcharge Increased**

The Public Utilities Commission has adopted an increase in Colorado's monthly telecommunications relay service surcharge. Effective October 1, 2019, the new surcharge will be \$0.06 per line, an increase from the current \$0.04 per line that has been in effect since March 1, 2018. The Commission found that "additional actions and events" had taken place requiring an increase of the surcharge. (Case 19M-0415T)

#### **FLORIDA – Commission Report Shows Wireline Migration to VoIP and Wireless Continue**

A Florida Public Service Commission report on the status of telecommunications competition in the state shows that the migration from wireline to wireless and voice over Internet protocol telephony services continues. The annual report, required for the state Legislature under Florida law, concluded that "For the eighth year in a row, the number of business landlines exceeded residential landlines, although both experienced significant drops in 2018. Residential landlines declined 23.6 percent, while business landlines declined 23 percent," the PSC said. CenturyLink was reported to be the largest residential landline provider, "despite experiencing a 30.2 percent decline in residential lines last year. AT&T's residential landlines declined 19.8 percent, and Frontier's declined 24.1 percent during the same period." Residential wireline customer migration to VoIP has increasing slightly, though business migration is significant. Carriers reported about 1.9 million total wireline access lines in Florida for 2018, about 23 percent fewer than the previous year, according to the report. There are an estimated 20.8 million wireless subscriptions in Florida and more than 4.5 million VoIP connections.

## **PENNSYLVANIA – Tentative Order to Revoke Operating Authority for Carriers Reporting Zero State Revenues**

On August 1, 2019, the Pennsylvania Public Utility Commission entered a [\*Tentative Order\*](#) in a proceeding to investigate revocation of operating authority for companies that report zero intrastate revenues. The *Tentative Order* finds that companies “that have reported zero gross intrastate operating revenues for three or more years are deemed to be no longer providing public utility service for compensation in Pennsylvania and, consequently, are no longer entitled to hold a Commission-issued [certificates of public convenience (CPCs)].” According to the Order, “Section 1102 of the Code specifies that a CPC is required prior to beginning to “offer, render, furnish or supply” service “within this Commonwealth.” 66 Pa. C.S. § 1102(a)(1) (emphasis added). Moreover, to obtain a CPC as a public utility in Pennsylvania, an entity must offer its service to the public for compensation. 66 Pa. C.S. §§ 102(1)(i), (ii), (iv)-(vii). Thus, it follows that all certificated public utilities must have intrastate revenues, demonstrating intrastate service to the public for compensation in Pennsylvania, to qualify for public utility status in Pennsylvania.” The Commission concludes that “A public utility holding a CPC that has reported zero gross intrastate revenues for several years indicates that it is no longer providing jurisdictional public utility service in Pennsylvania for compensation. Therefore, a CPC for that entity is no longer necessary or proper for the service, accommodation, convenience, or safety of the public under Section 1103(a) of the Code.” The Commission lists several companies that have not reported intrastate telecommunications revenues under the Commission’s decertification criteria and is initiating a proceeding to cancel operating authority for those companies. To the extent that a carrier on the list challenges the cancellation of its Certificate, the carrier must file comments within 20 days after publication of a Tentative Order in the *Pennsylvania Bulletin*. In accordance with due process, any such challenges may be referred to the Commission’s Bureau of Investigation and Enforcement for investigation and for whatever further action may be warranted. (M-2019-3010251) (Thanks to Mike Gruin, Stevens & Lee)

### **COMPLIANCE REPORTING DUE IN SEPTEMBER**

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

#### **FEDERAL REPORTS DUE IN SEPTEMBER**

|              |   |
|--------------|---|
| September 1  | FCC Form 477                                      |
| September 30 | FCC Form 492                                      |
| September 30 | FCC Form 507 (2Q)                                 |
| September 30 | High Cost Loop 2nd Quarter Forms & Certifications |
| September 30 | Universal Service Support "Use" Certification     |

Copies of FCC forms are available on the Internet at: <http://www.fcc.gov/formpage.html>.