

# FCC Picking Up the Pace on Omnibus CPNI NALs

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In February 2009, the FCC [proposed \\$20,000 fines against 600 carriers](#) for failing to file their annual CPNI certifications. The problem with issuing 600 fines of \$20,000 each? The FCC actually has to issue orders in all 600 cases. That process has turned into a bureaucratic quagmire, but -- finally -- there are signs that the FCC is making progress toward resolving the cases.

The Commission got off to a good start: In the summer of 2009, it released 58 orders canceling forfeitures (based on proof that the entity either filed on time or was not required to file) or settling cases against, primarily, very small telcos. After September 1, 2009, however, the FCC did not release another order resolving the Omnibus CPNI forfeitures for almost a year.

Beginning in June of this year, the pace picked up again. Since June 11, the FCC has issued over 40 orders resolving the Omnibus CPNI NALs. One order [canceled 15 NALs](#), again because the entities provided sufficient proof of timely filing. The rest have been settlements of the NALs. They follow essentially the same form: (1) the carrier agrees to implement a Compliance Plan; (2) for two years, the carrier agrees to provide a copy of its CPNI certifications to the Enforcement Bureau; and (3) the carrier pays a small settlement amount. Thus far, the settlements have ranged from [a few hundred dollars](#) to [a few thousand dollars](#) -- far below the \$20,000 proposed.

By my count, the FCC has resolved about 110 cases. It has just under 500 left to go.