

Reminder: FCC Filings Due March 2011

February 9, 2011

Please be reminded of the upcoming due dates for the Reports listed below:

Customer Proprietary Network Information Certifications

All telecommunications carriers and interconnected VoIP providers must file an annual report certifying their compliance with the Federal Communications Commission's ("Commission") rules regarding Customer Proprietary Network Information (CPNI). The report covers calendar year 2010 and must be filed with the Commission by **March 1, 2011**.

Please note: The Commission's Enforcement Bureau recently released a FCC Enforcement Advisory addressing the importance of making timely and compliant filings and noting that filers now have the option of filing CPNI certifications via a new Commission web application, in addition to filing via ECFS, mail or by hand delivery.

Form 477: Local Competition and Broadband Report

The Local Competition and Broadband Report, containing data as of December 31, 2010, must be filed by **March 1, 2011**. The report requires the submission of information regarding broadband connections in individual states.

Who Must File:

1. ILECs or CLECs that provide local exchange service to one or more end user customers;
2. facilities-based providers of mobile telephony services that serve one or more mobile telephony subscribers;
3. entities (including all commonly-owned or commonly-controlled affiliates) that are facilities-based providers of broadband (i.e., faster than 200 kbps, in at least one direction) connections (including both wired lines and wireless channels) to one or more end users in a state; and
4. providers of interconnected VoIP services that provide interconnected VoIP service to one or more subscribers in a state.

Reporting Basis:

In addition to specific reporting requirements contained in the Form 477 Instructions, for all broadband technologies other than terrestrial mobile wireless, filers must report broadband subscribership information by Census Tract.

Filing Process:

The Form 477 Report must be submitted via an FCC web-based interface and filers will need to use

their Federal Registration number ("FRN") and associated password to access the system.
Revised Form 499-Q Quarterly Telecommunications Reporting Worksheet

Carriers required to contribute to universal service support mechanisms must report their actual and projected end user and wholesale revenues for each calendar quarter by filing FCC Form 499Q on a quarterly basis. **Filers making revisions** to the February 1, 2011 Form 499-Q filing must submit the revisions to the Universal Service Administrative Company ("USAC") no later than **March 18, 2011**.
Revised Form 499-A Annual Telecommunications Reporting Worksheet

All providers of interstate telecommunications service and all common carriers are required to file FCC Form 499-A with USAC each year with limited exceptions. **Filers making revisions** to their previous year's Form 499-A Telecommunications Reporting Worksheet filing **which result in a decreased contribution** must submit the revisions to USAC by **March 31, 2011**.

Please be advised that attorneys in Kelley Drye & Warren's Communications practice group are experienced in addressing Federal Communications Commission reporting issues and are able to assist clients in filing the reports. For more information regarding this client advisory, please contact your usual Kelley Drye attorney or any member of the Communications practice group. For more information on the Communications practice group, please click [here](#).