

Reminder: Federal Communications Commission – April and May Filings

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Each month, Kelley Drye's Communications Group offers this reminder of upcoming filing deadlines that may affect our clients and friends. Please review the deadlines below and contact us if you would like assistance or have any questions.

I. Featured Upcoming Compliance Deadlines

II. Filing Deadlines in Select Rulemakings, Inquiries, and Other Proceedings

III. Select Ongoing Filing Requirements

I. FEATURED UPCOMING COMPLIANCE DEADLINES (in chronological order)

A. Form 499-Q Quarterly Telecommunications Reporting Worksheet (due May 1, 2025)

Carriers and providers of interstate and international telecommunications, including, but not limited to, interconnected Voice over Internet Protocol providers, providers offering interstate telecommunications for a fee on a non-common carrier basis, and payphone providers that are aggregators, are required to file the FCC Form 499-Q on a quarterly basis. Carriers and providers must report their actual and projected end user and carrier's carrier interstate and international revenues for each calendar quarter by filing the Form 499-Q.

The Form 499-Q filing reporting historical revenue for January 1 through March 31 of 2025 and projected revenues for July 1 through September 30 of 2025 must be submitted to the Universal Service Administrative Company on or before **May 1, 2025**.

Carriers and providers do not have to submit the Form 499-Q provided they are not required to contribute directly to the universal service support mechanisms, including but not limited to carriers and providers whose annual interstate and international revenues will be *de minimis* or which are international-only carriers and providers.

See also the item under Rulemakings and Inquiries regarding comment solicited on the proposed revisions to the annual and quarterly telecommunications revenues reporting worksheets (FCC forms 499-A and 499-Q) and accompanying instructions: "2026 Annual Telecommunications Reporting Worksheet."

Note: Post-filing revisions to this Form 499-Q filing, if any, must be filed within 45 days after May 1, 2025; *i.e.*, by Monday, **June 16, 2025** (because the 45th day falls on a Sunday).

As a reminder, Form 499-Q filers are required to submit the form electronically through USAC's E-File

system, available at <https://www.usac.org/service-providers/>.

B. Section 64.1900 Geographic Rate Averaging Certification (due May 1, 2025)

Each *non-dominant provider of de-tariffed interstate, domestic, interexchange services* must certify that it provides such service in compliance with its geographic rate average and rate integration obligations pursuant to section 254(g) of the Communications Act. As confirmed in a March 25, 2025, [Public Notice](#), the Certification must be signed by an officer of the company and filed in CC Dkt. No. 96-61 by **May 1, 2025**.

II. FILING DEADLINES IN SELECT RULEMAKINGS, INQUIRIES, AND OTHER PROCEEDINGS

A. RULEMAKINGS and INQUIRIES

AWS-3 Auction Procedures. On March 11, 2025, the Office of Economics and Analytics and Wireless Telecommunications Bureau issued a [Public Notice](#) in AU Dkt. No. 25-117, seeking comment on procedures for Auction 113, intended to include 200 licenses in the 1695-1710 megahertz, 1755-1780 MHz, and 2155-2180 MHz ("AWS-3") bands. Comments were due on April 10, 2025, with reply comments due on **April 25, 2025**.

Commercial Advertisement Loudness Mitigation ("CALM") Act. On February 28, 2025, the FCC released a [Notice of Proposed Rulemaking](#) ("NPRM") in MB Dkt. No. 25-72, requesting comments regarding the necessity for updates to the FCC's rules implementing the CALM Act, including whether the current rules have been effective and what changes might be appropriate. The NPRM also seeks preliminary comment as to the FCC's authority to take action regarding program volume on streaming platforms and, more generally, requests recommendations as to steps that the FCC, industry and standards developers might take to reduce harms to consumers. Following publication in the March 11, 2025, [Federal Register](#), comments were due on April 10, 2025, with reply comments due on **April 25, 2025**. (Associated Paperwork Reduction Act comments are due on May 12, 2025. See next section.)

Telephone Consumer Protection Act ("TCPA"). On March 11, 2025, the Consumer and Governmental Affairs Bureau released a [Public Notice](#) in CG Dkt. No. 02-278, requesting comment on the Edison Electric Institute [Petition for Declaratory Ruling](#) for a clarification of TCPA "prior express consent" analysis. Comments were due on April 10, 2025, with reply comments due **on April 25, 2025**.

4.9 GHz Band Petition for Rulemaking. On March 26, 2025, the Public Safety and Homeland Security Bureau and Wireless Telecommunications Bureau released a [Public Notice](#), in WP Dkt. No. 07-100 / RM-12002, seeking comment on the Association of Public-Safety Communications Officials International ("APCO") February 4, 2025, [Petition for Rulemaking](#). APCO asks the FCC to revise Rule 90.1215 to permit 5G microcell operations in the 4.9 GHz band and, in effect, "modify the part 90 power limits and out-of-band emissions limits to more closely align with the Commission's part 27 rules governing mobile broadband network deployment." Comments are due **April 25, 2025**, with reply comments due on **May 12, 2025**.

"Prosperity Through Deregulation." In a March 12, 2025, [Public Notice](#), in GN Dkt. No. 25-133, the FCC requested "comment on deregulatory initiatives that would facilitate and encourage American firms' investment in modernizing their networks, developing infrastructure, and offering innovative and advanced capabilities." The FCC undertakes this particular review of its regulations – captioned "In Re: Delete, Delete, Delete" -- in response to recent Executive Orders, but notes that

"administrative law requires review of rules to ensure that unnecessary -- or affirmatively detrimental -- rules are not retained." Comments were due on April 11, 2025. A large number of parties from all sectors filed on a wide range of the FCC's regulatory framework. Reply comments are due on **April 28, 2025**.

Positioning, Navigation, and Timing (PNT) Technologies. On March 28, 2025, the FCC released a [Notice of Inquiry](#) in WT Dkt. No. 25-110, seeking comment on how the FCC might effectively "incentivize and support industry efforts to develop complementary PNT technologies and solutions for civil use that may be used in conjunction with GPS" as well as "alternative PNT technologies and solutions that may better achieve PNT resilience nationwide." Comments are due on **April 28, 2025**, with reply comments due on **May 13, 2025**.

"Upper C-Band" Spectrum Usage. On February 27, 2025, the FCC adopted a [Notice of Inquiry](#) in GN Dkt. No. 25-59, seeking comment whether the spectrum in the "upper C-band" (3.98-4.2 GHz) should be reallocated, how in-band and adjacent band services would be impacted, and whether the methods previously used for the transition of the 3.70-3.98 GHz provide a viable model for doing so. Comments are due on **April 29, 2025**, with reply comments due on **May 29, 2025**.

National Environmental Policy Act (NEPA) Rules. On March 31, 2025, the Wireless Telecommunications Bureau issued a [Public Notice](#) in RM-12003, seeking comment on a CTIA [Petition for Rulemaking](#) which "requests that the Commission update and streamline the Commission's NEPA rules in Part 1, Subpart I, to facilitate wireless broadband deployment across the country." Comments are due on **April 30, 2025**, and reply comments are due on **May 15, 2025**.

Emergency Alert System (EAS). On April 2, 2025, the FCC issued a [Public Notice](#) in PS Dkt. Nos. 15-94 and 22-329, regarding a National Association of Broadcasters [Petition for Rulemaking](#) that requests the FCC "allow, but not require, Emergency Alert System (EAS) participants to use software-based EAS encode/decoder (endec) technology instead of a legacy physical hardware device to process EAS messages." Comments are due **May 2, 2025**.

2026 Annual Telecommunications Reporting Worksheet. On April 4, 2025, the Wireline Competition Bureau issued a [Public Notice](#) in WC Dkt. No. 06-122, seeking comment on proposed revisions to the annual and quarterly telecommunications reporting worksheets (FCC forms 499-A and 499-Q) and accompanying instructions. **Comments are due May 5, 2025.**

Submarine Cable Landing License Regulatory Framework. On November 21, 2024, the FCC adopted an [NPRM](#) in OI Dkt. No. 24-523 and MD Dkt. No. 24-524 to examine comprehensively the regulatory framework surrounding submarine cable system landing licenses, proposing, or raising the prospect of, major changes in who must hold a submarine cable license, shorter license terms, periodic reviews of licenses, and other significant rule modifications leading to greater applicant and licensee obligations. Following publication in the March 13, 2025 [Federal Register](#), comments were due on April 14, 2025, with reply comments due on **May 12, 2025**. (Associated Paperwork Reduction Act comments are due on May 12, 2025. See next section.)

Advanced Air Mobility ("AAM") Systems and Uncrewed Aircraft Systems ("UAS"). On January 17, 2025, the FCC released an [NPRM](#) in WT Dkt. No. 24-629, seeking comment on proposed spectrum rules intended to "facilitate the deployment of various manifestations of AAM and UAS operations." The NPRM proposes amendments to the operational rules for "three distinct bands of spectrum," including (i) service rules for 650 kilohertz of spectrum in the 450 MHz band; rule changes to permit radiolocation operations in the 24.45-24.65 GHz band; and "modernizing" of the rules governing Commercial Aviation Air-Ground Systems. Following publication in the March 17,

2025, [Federal Register](#), comments were due April 16, with replies due on **May 16, 2025**.

Broadband Use in the 900 MHz Band. On January 16, 2025, the FCC released a [NPRM](#) in WT Dkt. No. 24-99 / RM-11977, proposing “a framework that will enable increased broadband deployment on all ten megahertz of the band’s spectrum while also maintaining the option of narrowband operations to meet the needs of incumbents in the band.” The NPRM seeks comment on a “proposed voluntary, negotiation-based process to transition the entire ten megahertz in the 900 MHz band for broadband use in counties where broadband proponents and incumbent licensees reach private agreements to do so” and “whether the current 900 MHz broadband rules, such as the eligibility criteria, application requirements and procedures, licensing and operating rules, and technical requirements, are the appropriate vehicles for effectuating a ten megahertz broadband licensing framework.” Following publication in the March 17, 2025, [Federal Register](#), comments are due on **May 16, 2025**, with reply comments due on **June 16, 2025**.

Wireless Emergency Alert (WEA). On February 28, 2025, the FCC released the [Eleventh Further Notice of Proposed Rulemaking](#) (FNPRM) in PS Dkt Nos. 15-91 and 15-94, seeking comment on proposals to “broaden the circumstances where alert originators may send a WEA using the “Public Safety Message” classification” as well as input regarding whether to enable subscribers to further customize their receipt of WEA messages and additional steps the FCC might take to reduce subscriber opt-out rate for WEA. Following publication in the March 18, 2025, [Federal Register](#) and issuance of a [Public Notice](#) on March 19, 2025, comments were due on April 17, 2025, with reply comments due on **May 19, 2025**.

B. Additional PAPERWORK ACT REDUCTION (“PRA”) Comments

Form 481 Information Collection Revision (High-Cost Fund). On March 5, 2025, the FCC issued a [Notice](#) in the Federal Register, seeking PRA comments on proposed revisions to an information collection in connection with FCC Form 481. The proposed revisions are intended to reflect changes that have been made to associated high-cost programs and support and include revisions to Form 481 and the associated instructions. Comments are due on **May 5, 2025**.

Commercial Advertisement Loudness Mitigation (“CALM”) Act. On February 28, 2025, the FCC released a [NPRM](#) in MB Dkt. No. 25-72 (see description in preceding section) regarding the necessity for updates to the FCC’s rules implementing the CALM Act. Following publication in the March 11, 2025, [Federal Register](#), associated Paperwork Reduction Act (“PRA”) comments are due on **May 12, 2025**

Call Blocking. On April 1, 2025, the FCC published a [Notice](#) in the Federal Register, seeking comment on proposed revisions to an information collection regarding unwanted and illegal robocalls. The proposed revisions result from the February 27, 2025, adoption of the [Eighth Report and Order](#) in CG Dkt. No. 17-59. Comments are due **June 2, 2025**.

III. SELECT ONGOING FILING REQUIREMENTS

Assignments of Authorization and Transfers of Control can be filed either as *pro forma* applications or non-*pro forma* applications.

A pro forma assignment or transfer is one in which the form of ownership changes but actual control of the license remains with the same entity or person. Most *pro forma* assignments and transfers may be approved under streamlined Forbearance procedures in the case of most telecommunications carriers (*e.g.*, Section 214 authorization holders, wireless licensees (excluding

those with installment payment or designated entity issues) and earth station licensees). Unlike non-pro forma assignments and transfers of control, where there is a substantial change in direct or indirect ownership or control, *i.e.*, a *de jure* or *de facto* change introducing a new party or person with a controlling interest, requests regarding *pro forma* changes where the ultimate control and ownership remains the same do not require prior FCC approval provided that the parties **notify the FCC of the change within 30 days**. Note that private licenses are not subject to forbearance such that FCC advance approval generally is required for *pro forma* transfers and assignments of private licenses.

Additional Requirements for International Section 214 and Subsea Cable Landing License Applications for Authority or Involving Substantive Assignments, Transfers of Control, or Modifications of such Authority, and for Section 310(b) Petitions

Pursuant to an August, 2024, [Public Notice](#), additional requirements are now in effect for all applications for international Section 214 authorizations and submarine cable landing licenses as well as any applications for assignment, transfer of control or modification, in connection with such authorizations and licenses, where applicants have direct or indirect foreign ownership above threshold levels (generally 10% or more equity or voting interests, or based upon other FCC-recognized indicia of control). The requirements also apply to petitions for declaratory ruling related to foreign ownership under section 310(b) of the Communications Act. Parties making such filings must submit responses to a set of “Standard Questions” to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (the “Committee”) prior to, or concurrent with, filing their application with the FCC and also must submit a copy of their FCC application to the Committee within three business days after filing. Additional information and the Standard Questions (which vary by category of applicant) are available on the Office of International Affairs (“OIA”) dedicated [webpage](#).

Additionally, specified certifications and point of contact information must now be included in all applications involving international Section 214 authorizations or submarine cable landing licenses (regardless of ownership) as well as petitions for declaratory ruling relating to foreign ownership. Details for this required content are available at the OIA dedicated [webpage](#).

Change in FCC Form 499 Filer Information

Filers must update their registration information, including a DC Agent for Service of Process in accordance with these instructions to the FCC Form 499-A. Filers must file updated information within one week of the contact information change. Filers wishing to update Preparer information, headquarters address, billing contact information, or DC Agent for Service of Process, can submit either an FCC Form 499-A or an FCC Form 499-Q or, for billing-related matters only, email USAC’s billing department. Filers wishing to update any other information must submit a revised FCC Form 499-A. For more information, see <https://www.usac.org/service-providers/contributing-to-the-usf/making-revisions/>.

Filers that cease providing telecommunications must deactivate their Filer ID with USAC by submitting a letter with termination date and information on their successor entity to USAC. Filers must also update their CORES ID information with the Commission

Filers must file within 30 days of the date that the company ceases to provide telecommunications service or telecommunications.

FCC: <https://apps.fcc.gov/cores/userLogin.do>

USAC: www.usac.org/service-providers/contributing-to-the-usf/manage-your-499-id

Change in Robocall Mitigation Plans

Voice service providers, gateway providers, and non-gateway intermediate providers are required under the FCC's Caller ID Authentication rules (47 C.F.R. § 64.6300 *et seq.*) to implement an appropriate robocall mitigation program and remit information about that program in the FCC's Robocall Mitigation Database ("RMD"). **Providers are required to update their filings in the RMD within 10 business days of any change to the information provided, including the following:**

- Certification as to the implementation of STIR/SHAKEN in the provider's network;
- The extension(s) that apply to the provider's implementation of the STIR/SHAKEN framework;
- The specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of a robocall mitigation program;
- The provider's commitment to respond to all traceback requests and law enforcement requests for information on illegal robocalling; and
- The provider's business name, d/b/a name(s), former name(s), its legal address and contact information for one person within the company responsible for addressing robocall mitigation-related issues.

The link for remitting the required RMD filing is available [here](#).

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Attorneys in Kelley Drye's Communications Practice Group are experienced in addressing a full range of communications business and regulatory issues, including radiofrequency spectrum allocations, radio system licensing, radio service operating and technical rules, coordination agreements between users, and interference resolution. For more information, please contact your current Kelley Drye attorney or any member of the [Communications Practice Group](#).