Reminder: Federal Communications Commission – July and August 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 (in chronological order)

A. Manufacturer Hearing Aid Compatibility Report (Form 655) (due July 31, 2025)

Manufacturers of wireless handsets that are used in the delivery of digital commercial mobile radio service within the scope of FCC Rule 20.19 are required to file information annually regarding their compliance with the FCC's applicable hearing aid compatibility rules by **July 31, 2025** (for the reporting period July 1, 2024 through June 30, 2025). Further information and access to the filing database is available here.

B. Form 499-Q Quarterly Telecommunications Reporting Worksheet (due August 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 April 1 through June 30 of 2025 and projected revenues for October 1 through December 31 of 2025 must be submitted to the Universal Service Administrative Company on or before **August 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.

Note: Post-filing revisions to this Form 499-Q filing, if any, must be filed within 45 days after August

1, 2025, *i.e.*, by Monday, September 15, 2025.

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/.

C. Form 502: Numbering Resource Utilization/Forecast Report (due August 1, 2025)

Section 52.15(f) of the FCC's rules requires carriers that receive numbers from the North American Numbering Plan Administrator ("NANPA"), a pooling administrator, or another telecommunications carrier, to file Form 502 twice annually to report numbering usage and to forecast future numbering resource needs.

The next Form 502 must be submitted to NANPA by **August 1, 2025**, and reflects information for the preceding 6-month period ending June 30, 2025. Form 502 and related information can be found at here.

Broadband Data Collection Announcement

In a June 30, 2025, Public Notice, the Broadband Data Task Force announced the opening on July 1, 2025, of the filing window for the Seventh Broadband Data Collection, which is due by **September 2, 2025**. The Public Notice also announced that the June 2025 update of the Broadband Serviceable Location Fabric (Fabric) is being made available to existing Fabric licensees. Related information is available at https://www.fcc.gov/BroadbandData/filers.

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

A. *RULEMAKINGS and INQUIRIES*

Call Authentication Trust Anchor. On April 29, 2025, the FCC released a Notice of Proposed Rulemaking ("NPRM") in WC Dkt. No. 17-97, seeking comment on its proposal to adopt the conclusion that "effective non-IP caller ID authentication frameworks are developed and reasonably available" and impose the associated requirement that "voice service providers, gateway providers, and non-gateway intermediate providers that have not upgraded their networks to IP implement one or more non-IP caller ID authentication frameworks in their non-IP networks by a date certain." Following publication in the June 16, 2025, Federal Register, comments are due on **July 16, 2025**, with reply comments due on **August 15, 2025**.

Maritime Regulations and RTCM Standards. On June 17, 2025, the FCC issued a Public Notice in WTB RM-12004, seeking comment on the March 31, 2025, Petition for Rulemaking ("Petition") of the Radio Technical Commission for Maritime Services ("RTCM"). The RTCM Petition requests that the FCC revise its Rule 95.2989 provisions to incorporate updated RTCM standards. Comments are due on **July 17, 2025**.

Hearing Aid Compatibility ("HAC") Waiver Request. On July 8, 2025, the Wireless Telecommunications Bureau released a Public Notice in WT Dkt. Nos. 23-388 and 20-3, seeking comment on the July 2, 2025, Petition for Extension of Waiver of CTIA which requests approval for the continued use of a temporary volume control standard to certify handsets as hearing aid compatible beyond the current waiver expiration on September 29, 2025. The Public Notice requests comment on the merits of the proposed extension and the appropriate duration of any such extension. Comments are due on **July 18, 2025**, with reply comments due on **July 28, 2025**.

Handset Unlocking Waiver Request. On June 6, 2025, the WTB released a Public Notice in WT

Dkt. Nos. 06-150 and 24-186 and GN Dkt. No. 21-112, seeking comment on the May 19, 2025, Request for Waiver filed by subsidiaries of Verizon Communications, Inc., in connection with the handset unlocking rule in section 27.16(e) and the additional handset unlocking commitment that was agreed to as a condition for the FCC's approval of Verizon's acquisition of Tracfone. Comments were due on July 7, 2025, with replies due on **July 21, 2025**.

Fiscal Year 2025 Regulatory Fees. On June 5, 2025, the FCC issued an NPRM in MD Dkt. Nos. 25-190 and 24-85, requesting comment on proposed regulatory fees and methodology for the 2025 fiscal year. Comments were due July 7, 2025, with reply comments due on **July 21, 2025**.

Foreign Adversary Ownership of FCC Licenses. On May 27, 2025, the FCC released an NPRM in GN Dkt. No. 25-166 addressing concerns regarding ownership of FCC licensees by individuals or entities that are “owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary.” The NPRM seeks comment on proposals to require both initial and ongoing certifications and disclosures regarding such influence from broad categories of license and authorization holders. Potentially affected license and authorization holders include, without limitation, wireless license-holders and lessees, entities holding section 310(b) declaratory rulings, antenna structure registrants, frequency coordinators, satellite networks, broadcast licensees, multichannel video programming distributors, International High Frequency authorization holders, Section 325(c) permit holders, submarine cable landing licensees, domestic and international Section 214 authorization holders, Eligible Telecommunications Carriers, holders of authority for Voice over Internet Protocol (“VoIP”) direct access to numbers, FCC auction applicants, applicants for equipment certification, Data Network Identification Code holders., International Signaling Point Code holders. Recognized Operating Agencies, Internet-based Telecommunications Relay Services certification holders, and others. Following publication in the June 20, 2025, Federal Register, comments are due on **July 21, 2025**, with reply comments due on **August 19, 2025**.

United States Cellular Corporation – Verizon Spectrum Sale. On June 6, 2025, the Wireless Telecommunications Bureau (“WTB”) issued a Public Notice in WT docket 25-192, establishing a pleading cycle for the thirty-nine (39) spectrum assignment applications filed by Cellco Partnership, a subsidiary of Verizon Wireless and United States Cellular Corporation ("UScellular"). The applications seek approval for UScellular to assign cellular, AWS-1, AWS-3, and PCS licenses from its subsidiaries to Verizon Wireless as part of UScellular’s plan to exit the mobile wireless business. Petitions to deny were due July 7, 2025; oppositions and comments are due **July 22, 2025**, with replies due on **August 1, 2025**.

Foreign Ownership Policies Applicable to Certain Radio Station Licensees. On April 29, 2025, the FCC released an NPRM in GN Dkt. No. 25-149 addressing requirements for public interest analysis of proposed foreign investment in broadcast, common carrier, aeronautical en route, and aeronautical fixed radio station licensees under Section 310(b) of the Communications Act of 1934, as amended. The NPRM seeks comment on the FCC’s proposals “to codify definitions and concepts underlying the foreign ownership rules and practice and to streamline our review processes” noting the FCC’s belief that “these proposals will assist petitioners in providing the relevant information in their initial filings, minimize the need for supplemental filings, and promote efficient and shorter processing times of Section 310(b) petitions.” Following publication in the June 23, 2025, Federal Register and a concurrent Public Notice, comments are due on **July 23, 2025**, with reply comments due on **August 22, 2025**.

Dormant Proceedings Termination. On May 2, 2025, the Consumer and Governmental Affairs Bureau (“CGB”) issued the Ninth Dormant Proceedings Termination Public Notice, in CG Dkt. No. 25-

165, requesting comment whether certain docketed proceedings should be terminated. CGB presented a list of 2,057 proceedings for consideration and asked commenters to identify any additional proceedings that should be terminated. Following publication in the June 9, 2025, Federal Register, comments were due on July 9, 2025 with reply comments due on **July 24, 2025**.

GSO and NGSO Satellite Spectrum Sharing. On April 29, 2025, the FCC released an NPRM in SB Dkt. No. 25-157 to consider the "decades-old spectrum sharing regime" between geostationary (GSO) and non-geostationary ("NGSO") satellite systems operating in the 10.7-12.7, 17.3-18.6, and 19.7-20.2 GHz bands. The NPRM seeks comment regarding strategies that could "ensure highly efficient and effective use of the shared spectrum, and support a more efficient and competitive market for satellite broadband and other in-demand services while uncapping the potential of satellite constellations . . ." Following publication in the June 13, 2025, Federal Register, comments are due **July 28, 2025**, with reply comments due on **August 27, 2025**.

37 GHz Band Service Rules. On April 29, 2025, the FCC released a Further Notice of Proposed Rulemaking ("FNPRM") (with Erratum on June 11, 2025) in WT Dkt. No. 24-243 and GN Dkt. No. 14-177, seeking comment on issues including whether the FCC "should revise the emissions limits for Upper Microwave Flexible Use Service ("UMFUS") operations above 37 GHz to protect passive sensors in the adjacent 36–37 GHz band, whether the initial coordination mechanism can be enhanced by consideration of additional factors like clutter, the development of an automated portal, and/or whether a dynamic sharing mechanism might be considered in the future." Following publication in the June 12, 2025, Federal Register, comments were due on July 14, 2025, with reply comments due on **July 28, 2025**.

Final Frontiers – Expanding Satellite Connectivity. On May 27, 2025, the FCC released an FNPRM and NPRM in SB Dkt. No. 25-180, GN Dkt. Nos. 22-352 and 14-177 and WT Dkt. No. 23-158. The FNPRM seeks comment on "ways to use the 12.7-13.25 GHz band (12.7 GHz band) and the 42.0-42.5 GHz band (42 GHz band) more efficiently and intensively." The NPRM requests comment regarding the potential to open up spectrum in the 51.4-52.4 GHz band (52 GHz band) and certain "W-band" frequencies (specifically, 92.0-94.0 GHz, 94.1-100 GHz, 102.0-109.5 GHz, and 111.8-114.25 GHz), both of which the FCC describes as "large swathes of spectrum that are largely unused for non-Federal services today. . . [and] the subject of considerable interest by stakeholders for commercial satellite use." Following publication in the June 27, 2025, Federal Register, comments are due **July 28, 2025,** with reply comments due on **August 26, 2025**.

NG911 Resiliency, Reliability, Interoperability, and Accessibility. On March 28, 2025, the FCC released an FNPRM in PS Dkt. Nos. 21-479 and 13-75, proposing rules "to both facilitate the NG911 transition and ensure that the transition does not inadvertently create vulnerabilities in critical public safety networks." Following publication in the June 4, 2025, Federal Register, comments are due on **August 4, 2025**, with reply comments due on **September 17**, **2025** (extended from the original schedule for comments to be due on July 21, 2025, and reply comments due on August 18, 2025).

National Television Multiple Ownership Rule. On June 18, 2025, the Media Bureau released a Public Notice in MB Dkt. No 17-318, requesting comments to refresh the record in the Bureau's National Television Multiple Ownership Rule proceeding. The Bureau seeks to update the record since the 2017 NPRM (the "National Cap NPRM") which considered whether to "retain, modify, or eliminate" the FCC's rules imposing the 39% national audience reach cap and/or the UHF discount. Following publication in the July 8, 2025, Federal Register, comments are due on **August 4, 2025**, with reply comments due on **August 22, 2025.**

Updating Telephone Access Charges Regulatory Framework. On June 11, 2025, the Wireline Competition Bureau issued a Public Notice,in WC Dkt. No. 20-71, requesting comments to update the record associated with its 2020 NPRM concerning "Telephone Access Charges." The 2020 NPRM considered whether, and to what extent, to eliminate *ex ante* pricing regulation and tariffing of all Telephone Access Charges and whether to prohibit carriers thereafter from separately listing Telephone Access Charges on customers' telephone bills. Five years later, the Public Notice seeks comment regarding the implications for the FCC's 2020 proposals of subsequent market changes, including any market consolidations, and/or subsequent changes in state regulation. Following publication in the July 7, 2025, Federal Register, comments are due on **August 6, 2025**, with reply comments due on **August 21, 2025**.

B. *Additional PAPERWORK ACT REDUCTION ("PRA") Comments*

Operation of Uncrewed Aircraft Systems ("UAS"). On August 29, 2024, the FCC released a Report and Order in WT Dkt. No. 22-323, adopting new UAS service rules to enable operators to obtain direct frequency assignments in a portion of the 5030-5091 MHz band. Following publication in the May 28, 2025, Federal Register, PRA comments on the new information collection resulting from the Report and Order are due on **July 28, 2025**.

III. SELECT ONGOING FILING REQUIREMENTS

Pro Forma Assignments and Transfers

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 sec*.) 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 negotiating contracts between service providers, and between service providers and their enterprise customers, as well as finding creative solutions to resolve disputes that may arise between interconnecting carriers or between carriers and their customers, or, if necessary, taking such disputes to mediation, to arbitration, or to court. For more information, please contact your current Kelley Drye attorney or any member of the Communications Practice Group.