

Reminder: Federal Communications Commission – June and July Filings

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June 10, 2025

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. Revisions to May 1, 2025, Form 499-Q Quarterly Telecommunications Reporting Worksheet (due June 16, 2025)

Carriers and providers of interstate and international telecommunications that seek to revise their May 1, 2025, Form 499-Q filing must do so within 45 days of the Form 499-Q filing deadline, *i.e.*, by **June 16, 2025** (because the 45th day, June 15, 2025, 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. Quarterly Section 1.767(I) Submarine Cable Licensee Reports (due June 30, 2025)

Submarine cable licensees that (i) are, or are affiliated with, carriers with market power in any of the submarine cable licensee's WTO Member destination countries; and (ii) have sought streamlined processing of a cable landing license, pursuant to section 1.767 of the Commission's rules are required to file a provisioning and maintenance report and a circuit status report within 90 days from the end of the preceding calendar quarter, *i.e.*, by **June 30, 2025** (because the 90th day, June 29, 2025, falls on a Sunday).

C. Quarterly Sec. 63.10(c) Dominant International Carrier Reports (due June 30, 2025)

International telecommunications service providers that are classified as dominant are required to submit (i) a quarterly international traffic and revenue report and (ii) a quarterly provisioning and maintenance report. These reports are due within 90 days from the end of the preceding calendar quarter, *i.e.*, by **June 30, 2025** (because the 90th day, June 29, 2025, falls on a Sunday).

Facilities-based international telecommunications service providers that are classified as dominant

also are required to file a quarterly circuit status report. This reports is due within 90 days from the end of the preceding calendar quarter, *i.e.*, by **June 30, 2025** (because the 90th day, June 29, 2025, falls on a Sunday).

D. Form 481 (“Carrier Annual Reporting Data Collection Form”) (due July 1, 2025)

Carriers required to submit the annual FCC Form 481 report (service providers participating in the Lifeline program and/or High Cost program) must do so by **July 1, 2025**. See the USAC website for [further information and instructions for filing](#) through the Universal Service Administrative Company (USAC) [E-file system](#).

E. 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](#).

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

A. RULEMAKINGS and INQUIRIES

Broadband Use in the 900 MHz Band (896-901/935-940 MHz band). On January 16, 2025, the FCC released a [Notice of Proposed Rulemaking](#) (“NPRM”) in WT Dkt. No. 24-99 / RM-11977, proposing to modify licensing rules for these bands yet again by adopting “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 were due on May 16, 2025, with reply comments due on **June 16, 2025**

Launch Communications Act (LCA) Petitions for Reconsideration. On May 16, 2025, the FCC issued a [Public Notice](#) of two petitions for reconsideration in Dkt. No. 13-115; specifically the April 7, 2025, Aerospace and Flight Test Radio Coordinating Council, Inc. [Requests for Clarification or, in the Alternative, Petition for Partial Reconsideration](#); and the GE HealthCare Technologies Inc. [Petition for Reconsideration](#). Both petitions address the December 31, 2024, [Third Report and Order](#) in which the FCC implemented certain provisions of the LCA. Following publication in the May 30, 2025, [Federal Register](#), oppositions are due on **June 16, 2025**, with replies due on **June 26, 2025** (the FCC informs us that a correction is being published in the Federal Register to reflect this date).

Wireless 911 Location Accuracy. On March 27, 2025, the FCC adopted a [Sixth Further Notice of Proposed Rulemaking](#) in PS Dkt. No. 07-114, seeking comment on proposed measures to improve wireless 911 location information in support of the work of Public Safety Answering Points and first responders. Following publication in the May 7, 2025, [Federal Register](#) and an FCC [Public Notice](#), comments were due on June 6, 2025, with reply comments due on **July 7, 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 ("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 are due **July 7, 2025**; oppositions and comments are due **July 22, 2025**; and replies are due on **August 1, 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. ("Verizon"), 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 are 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 are due **July 7, 2025**, with reply comments due on **July 21, 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 are due on **July 9, 2025** with reply comments due on **July 24, 2025**.

NG911 Resiliency, Reliability, Interoperability, and Accessibility. On March 27, 2025, the FCC adopted a [Further Notice of Proposed Rulemaking](#) 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 **July 21, 2025**, with reply comments due on **August 18, 2025**.

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

Call Authentication and Robocall Mitigation Database - PRA Comments. On April 21, 2025, the FCC issued a [Federal Register Notice](#), requesting comment on proposed revisions to the currently approved information collections for call authentication and the Robocall Mitigation Database ("RMD"), including changes arising from recent decisions that addressed (i) the use of third parties in the caller ID authentication process and (ii) procedures and technical frameworks to enhance the reliability and quality of RMD submissions. PRA comments are due on **June 20, 2025**.

Form 481 Information Collection - PRA Comments. On May 28, 2025, the FCC issued a [Public Notice](#) requesting comments on proposed revisions to the current Form 481 information collection, including to the form and its instructions, to reflect new and modified requirements. PRA comments are due on **June 27, 2025**.

Spectrum Sharing Rules for Non-Geostationary Orbit, Fixed-Satellite Service ("NGSO FSS") Systems - PRA Comments. On May 28, 2025, the FCC published a [Federal Register Notice](#), seeking comment on new information collection requirements arising from the April 21, 2023 [Report and Order](#) in IB Dkt. No. 21-456 (revising the FCC rules pertaining to spectrum sharing) and the November 15, 2024 [Second Report and Order and Order on Reconsideration](#) (further revising the

NGSO FSS sharing rules). The request describes the proposed new information collection requirements as “needed to determine the technical qualifications of licensees and market access grantees to operate an NGSO FSS space station and to determine whether operations under an NGSO FSS authorization serve the public interest, convenience and necessity.” PRA comments are due on **June 27, 2025**.

Unlawful Robocalls: Do Not Originate Requirements - PRA Comments. On February 28, 2025, the FCC released the [Eighth Report and Order](#) in CG Dkt. No. 17-59 (Advanced Methods to Target and Eliminate Unlawful Robocalls). Following publication in the June 10, 2025 [Federal Register](#), PRA comments on the modified information collection outlined in paragraphs 9-14 of the Report and Order, concerning use of a reasonable do-not-originate list, are due on **July 10, 2025**.

Operation of Unmanned 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, such as the proper classification of novel fiber-based and wireless communications services – whether they qualify as information services, telecommunications service, non-regulated telecommunications, or otherwise – and the ramifications of that classification, as well as strategies that may be available for structuring those services to eliminate or minimize the applicable regulation. For more information, please contact your current Kelley Drye attorney or any member of the [Communications Practice Group](#).