

Reminder: Federal Communications Commission – March and April 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. Revisions to February 3, 2025, Form 499-Q Quarterly Telecommunications Reporting Worksheet (due March 20, 2025)

Carriers and providers of interstate and international telecommunications that seek to revise their most recent Form 499-Q (due February 3, 2025) filing must do so within 45 days of the Form 499-Q filing deadline (which, in the first quarter of 2025, was February 3 because February 1 was a Saturday).

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. Supply Chain Annual Reporting (due March 31, 2025)

Pursuant to Section 5 of the Secure and Trusted Communications Networks Act of 2019 and [§1.50007 of the Commission’s rules](#), providers of advanced communications service are required to submit their annual Supply Chain Annual Report (unless exempted as described below). In this submission, due by **March 31, 2025**, for information **as of December 31, 2024**, providers must report and certify whether they have purchased, rented, leased, or otherwise obtained any covered communications equipment or service on the list of covered communications equipment and services (the “[Covered List](#)”) on or after August 14, 2018. Providers with such covered communications equipment or service must submit information annually “including the type, location, date purchased, rented, leased or otherwise obtained, and any removal and replacement plans.” (47 C.F.R. § 1.50007). Filings are required from:

- Providers that reported and certified such covered communications equipment and/or services in 2024; and

- Providers reporting the presence of newly obtained covered equipment or services (since their last report).

Providers that do not have any covered communications equipment or services are only required to submit an initial report and certification. Therefore, a provider that made, or relied upon, such a certification for the 2024 report and that still has no covered communications equipment or services (as currently included in the Covered List) is not required to make a filing this year.

Providers are reminded that the Covered List is subject to change. Should the Commission subsequently add equipment and/or services to the Covered List (as it did in March 2022, September 2022, and July 2024), providers with such equipment or services must report on these ***within 60 days of any change to the Covered List.***

Instructions for the submissions, access to the filing portal, and more extensive materials regarding the Supply Chain Annual Reporting requirement are located at <https://www.fcc.gov/supplychain>.

C. Quarterly Sec. 63.10(c) Dominant International Carrier Reports (due March 31, 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. Facilities-based international telecommunications service providers that are classified as dominant also are required to file a quarterly circuit status report. These reports are due within 90 days from the end of the preceding calendar quarter (i.e., **March 31, 2025**).

D. Quarterly Section 1.767(I) Submarine Cable Licensee Reports (due March 31, 2025)

Submarine cable licensees that are, or are affiliated with, carriers with market power in any of the submarine cable's destination countries 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., **March 31, 2025**). Note that affected licensees are often required to acknowledge this status at the time of their applications, and the status is typically reiterated in the public notice of the grant. The status can also be triggered after a grant.

E. Submarine Cable Circuit Capacity Reports (due March 31, 2025)

Each year the FCC collects data regarding capacity held on international submarine cable facilities by cable system operators and, separately, capacity holders through the following reports:

- **Cable Operators on International Submarine Cable Systems - Circuit Capacity Report**

Licensee(s) of submarine cables between the United States and a foreign point must report available and planned capacity on the cable as of December 31, 2024.

- **Capacity Holders on International Submarine Cable Systems - Circuit Capacity Report**

Cable landing licensees and common carriers that hold capacity on the U.S. end of submarine cable systems between the United States and foreign points, as of December 31, 2024, must report available capacity held via cable ownership, indefeasible right of use, or inter-carrier lease on the U.S. end of such systems.

The circuit capacity reports are due **March 31, 2025**, and must be submitted via the [online filing portal](#). Filers should be sure to review the FCC's [Section 43.82 filing manual](#) for further details

regarding the reports.

F. Form 499-A Annual Telecommunications Reporting Worksheet (due April 1, 2025)

All intrastate, interstate, and international providers of telecommunications within the United States, including, but not limited to, telecommunications common carriers, interconnected VoIP providers, telecommunications providers that provide services on a non-common carrier basis (i.e., private carriage), and payphone providers that are aggregators are required to file FCC Form 499-A with the Universal Service Administrative Company (“USAC”) each year with limited exceptions. In addition, non-interconnected VoIP providers with interstate end-user revenues subject to Telecommunications Relay Service (“TRS”) contributions must file the Form 499-A to report the revenues.

The Form 499-A is used to determine a company’s required contribution to the Universal Service Fund (“USF”), as well as to the Local Number Portability Administration (“LNPA”), North American Numbering Plan Administration (“NANPA”) and TRS funds. The Form 499-A is also the basis for a carrier’s annual FCC regulatory fee (i.e., the Interstate Telecommunications Service Provider (“ITSP”) Fee).

For new providers, the Form 499-A also serves as part of a carrier’s FCC registration, and registration is due [within 30 days of commencing provision of telecommunications as a private carrier, telecommunications service, interconnected VoIP service, or payphone service as an aggregator].

The Form 499-A worksheet, reporting CY 2024 revenues, must be filed by **Tuesday, April 1, 2025**. Filers are required to submit the Form 499-A electronically through USAC’s available at <https://www.usac.org/service-providers/>. Additional guidance is available in the FCC’s October 30, 2023, [release](#) of the [2025 Form 499-A](#) and associated [2025 Form 499-A Instructions](#).

NOTE: Any *revisions to a filer’s 2024 Form 499-A* (reporting CY 2023 revenues and due on or before April 1, 2024) which effect a reduction in the filer’s USF contribution obligations are due by **April 1, 2025**. There is no deadline for Form 499-A revisions that result in an increased contribution obligation.

G. Accessibility Recordkeeping Compliance and Contact Information Reporting Requirement (due April 1, 2025)

Telecommunications service providers, providers of advanced communications services (“ACS”) like electronic messaging, in-app voice calls and video conferencing, interconnected VoIP providers (collectively, “service providers”) and equipment manufacturers, subject to sections 255, 716, or 718 of the Communications Act (as amended by the Twenty-First Century Communications and Video Accessibility Act (“CVAA”)) are required to comply, subject to certain exceptions, with recordkeeping requirements to demonstrate that services and equipment are accessible by individuals with disabilities.

Service providers, providers of ACS, and equipment manufacturers must submit an annual certification that records are being kept in accordance with the rules. The certification must state that the service provider or manufacturer has established operating procedures to ensure compliance with the recordkeeping requirements and that records are being kept accordingly. An authorized officer with personal knowledge of the representations in the certification must submit an affidavit or declaration, executed under penalty of perjury, verifying the truth and accuracy of the certification. The certification also must include contact information for the person(s) responsible for resolving consumer complaints and the agent designated for service of formal and informal

complaints.

The certification must be submitted by **Tuesday, April 1, 2025**, utilizing the Federal Communications Commission's online filing system which can be found at <https://apps.fcc.gov/rccci-registry/>. Additional guidance for filers is available [here](#)

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

A. RULEMAKINGS and INQUIRIES

Reallocation of the 1675-1680 MHz band. On January 8, 2025, the Wireless Telecommunications Bureau ("WTB") released a [Public Notice](#) in WT Dkt. No. 19-116, requesting comments "to supplement the record on a proposal to re-allocate the 1675-1680 MHz band for shared use between incumbent federal operations and non-federal fixed or mobile operations on a co-primary basis." WTB points to developments in the proceeding since the last round of comments, citing, in particular, reports prepared by NOAA (filed by NTIA) in 2022 and 2024. The 2024 report found that it may be technically feasible to share the 1675-1680 MHz band, which NOAA uses for transmission of time-sensitive satellite data, with commercial wireless services, subject to certain conditions. Following publication in the January 29, 2025 [Federal Register](#), comments were due on February 29, 2025, with reply comments due on **March 17, 2025**.

Ultra-Wideband ("UWB") Waiver Requests. On February 25, 2025, the Office of Engineering and Technology issued Public Notices, seeking comment on two waiver requests in connection with UWB door lock systems that would operate in the 6-10 gigahertz band. The [Public Notice](#) in ET Dkt. No. 25-102 addresses [Lumi United Technology Co. LTD Request for Waiver](#) while the [Public Notice](#) in ET Dkt. No. 25-103 addresses the [U-tec Group Inc. Request for Waiver](#). In each of these proceedings, comments are due on **March 27, 2025**, with replies due on **April 11, 2025**.

Satellite Space Station and Earth Station Regulatory Fees. On February 25, 2025, the FCC released a [Further Notice of Proposed Rulemaking](#) ("NPRM") in MD Dkt. No. 24-85, requesting comment on proposals to revise methods for assessment of regulatory fees on space and earth stations. The proposals were initially issued in a March 2024 [NPRM](#), but further action was delayed to allow for additional comment and review. Following publication in the March 13, 2025 [Federal Register](#), comments are due on **March 27, 2025**, with replies due on **April 11, 2025**.

Auction of AWS-3 Spectrum. On February 28, 2025, the FCC released a [Notice of Proposed Rulemaking](#) ("NPRM") in GN Dkt. Nos. 25-70, 25-71, and 13-185, addressing a future auction of AWS-3 spectrum that is currently not licensed (i.e., in FCC inventory). Rule changes proposed in the NPRM are intended to update the AWS-3 service rules regarding bidding credits and legislative actions regarding how agencies may categorize "small business concerns" taken since the spectrum was originally auctioned in 2014. The NPRM also notes the FCC's decision in 2019 to incorporate a pre-auction Tribal licensing window for the 2.5 GHz band and seeks comment whether the *Spectrum and Secure Technology and Innovation Act* mandate for use of "competitive bidding" allows the FCC to adopt a similar Tribal licensing window for the AWS-3 spectrum and the potential benefits were it to do so. Comments are due on **March 31, 2025**, with reply comments due on **April 14, 2025**. [See *related item below regarding auction procedures*.]

Text-to-988 Georouting. On February 19, 2025, the Wireline Competition Bureau issued a [Public Notice](#) in Dkt. No. 18-336, requesting "additional, targeted comment on potential privacy issues involved in georouting text-to-988." The inquiry follows on the FCC's October 18, 2024, [Third Further Notice of Proposed Rulemaking](#) regarding implementation of the National Suicide Hotline Act of

2018. Following publication in the March 4, 2025, [Federal Register](#), comments are due on **April 3, 2025**, and reply comments are due on **April 18, 2025**.

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 are due on **April 10, 2025**, with reply comments due on **April 25, 2025**. [*See related item above regarding possible AWS-3 rule changes.*]

Commercial Advertisement Loudness Mitigation (“CALM”) Act. On February 28, 2025, the FCC released a [Notice of Proposed Rulemaking](#) 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 are due on **April 10, 2025**, with reply comments due on **April 25, 2025**. Associated Paperwork Reduction Act (“PRA”) comments are due on **May 12, 2025**.

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 are due on **April 10, 2025**, with reply comments due on **April 25, 2025**.

Submarine Cable Landing License Regulatory Framework. On November 21, 2024, the FCC adopted a [Notice of Proposed Rulemaking](#) 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 are due on **April 14, 2025**, with reply comments due on **May 12, 2025**. PRA comments associated with this proceeding are due on **May 12, 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 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**.

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

Reporting Requirements for Commercial Television Broadcast Station Blackouts. On January 3, 2025, the FCC released a [Report and Order](#) (“Order”) in MB Dkt. No. 23-427, adopting a requirement that it be notified “of broadcast station blackouts lasting over 24 hours that occur on cable and satellite TV platforms due to a retransmission consent negotiation impasse.” The Order further calls for the establishment of a “centralized, Commission-hosted database of basic blackout information” to increase transparency regarding the frequency and duration of such events. New information collection requirements arising from the Order are subject to PRA review. Following publication in the January 23, 2025 [Federal Register](#), PRA comments are due on **March 24, 2025**.

Rules for FM Terrestrial Digital Audio Broadcasting System. On September 24, 2024, the Commission adopted the [First Report and Order](#) in MB Docket No. 22-405, authorizing digital FM station operation with asymmetric power on the digital sidebands and adopting proposed modifications to Schedule 335-FM and rule sections 73.404 and 73.406. Following publication in the February 26, 2025, [Federal Register](#), PRA comments on these proposed changes are due on **March 28, 2025**.

E-Rate Program Information Collection. On July 29, 2024, the FCC adopted a [Report and Order \(“R&O”\)](#) in WC Dkt. No. 21-31, regarding the distribution of Wi-Fi hotspots and services under the E-Rate Program for off-premises use. Pursuant to publication in the March 5, 2025, [Federal Register](#), PRA comments are requested by **April 4, 2025**, regarding new information requirements adopted in the R&O.

IoT Labeling Program. On September 10, 2024, the Public Safety and Homeland Security Bureau issued a [Public Notice](#) announcing the filing window to apply for designation as Cybersecurity Labeling Administrators (“CLAs”) and Lead Administrator for the IoT Cybersecurity labelling program. Among other responsibilities attaching to the CLAs and the Lead Administrator will be the creation, management and implementation of a cybersecurity risk management plan. Following publication in the March 7, 2025, [Federal Register](#), PRA comments on the revised requirements for CLA creation, management and implementation of these plans are due **April 7, 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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This reminder is made available for informational purposes only and does not constitute legal advice to the reader. Kelley Drye does not assume an obligation to update the information provided herein or correct any inadvertent errors.

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Attorneys in Kelley Drye's Communications Practice Group are experienced in addressing universal service filing and affected provider contribution issues and are available to assist clients with determining how to report their revenues for universal service purposes and to respond to FCC and Universal Service Administrative Company ("USAC") inquiries, investigations, and audits. For more information, please contact your current Kelley Drye attorney or any member of the [Communications Practice Group](#).