

Reminder: Federal Communications Commission – May and June Filings

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May 14, 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.

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.

Facilities-based international telecommunications service providers that are classified as dominant also are required to file a quarterly circuit status report. This report is due within 90 days from the

end of the preceding calendar quarter.

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

A. RULEMAKINGS and INQUIRIES

Very Low Power (“VLP”) Device Operations. On April 7, 2025, the National Association of Broadcasters filed a [Petition for Reconsideration](#) of the FCC’s December, 2025, [Third Report and Order](#) in ET Dkt. No. 18-295 and GN Dkt. No. 17-183 (expanding unlicensed VLP device operations within the 6 GHz band). Following the FCC [Public Notice](#) on April 17, 2025, and publication in the April 29, 2025, [Federal Register](#), oppositions are due on **May 14, 2025**, with replies due **May 27, 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 were due on April 30, 2025, and reply comments are due on **May 15, 2025**.

Advanced Air Mobility (“AAM”) Systems and Uncrewed Aircraft Systems (“UAS”). On January 17, 2025, the FCC released a [Notice of Proposed Rulemaking](#) (“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) changes to the service rules for 650 kilohertz of spectrum in the 450 MHz band; (ii) rule changes to permit radiolocation operations in the 24.45-24.65 GHz band; and (iii) “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 (896-901/935-940 MHz band). On January 16, 2025, the FCC released an [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**.

Reconsideration of Wireless Emergency Alerts (“WEAs”) Order. On April 18, 2025, the Alliance for Telecommunications Industry Solutions (ATIS) filed a [Petition for Clarification and/or Reconsideration](#) in PS Dkt. Nos. 15-91 and 15-94, regarding the FCC’s February 28, 2025, [Seventh Report and Order](#) (addressing alert fatigue, WEA consumer opt-outs and silent alerts among other topics). Following publication in the May 1, 2025, [Federal Register](#), oppositions are due on **May 16, 2025**, with replies due on **May 27, 2025**. (See entry, following below, for comments upon the associated Further Notice of Proposed Rulemaking).

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 now due on **May 19, 2025** (extended from May 12, 2025).

Further Rulemaking Regarding Wireless Emergency Alerts. On February 28, 2025, the FCC released the [Eleventh Further Notice of Proposed Rulemaking](#) 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 the 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**.

“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 (such as aviation radar altimeters) 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 were due on April 29, 2025, with reply comments due on **May 29, 2025**.

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 are due on **June 6, 2025**, with reply comments due on **July 7, 2025**.

Registered Industry Traceback Consortium. Pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), the Enforcement Bureau is accepting Letters of Intent through May 23, 2025, for interested consortia (other than the incumbent) to demonstrate their qualifications. Pursuant to an April 17, 2025, [Public Notice](#) in EB Dkt. No. 20-22, comment is sought both on the submitted Letters of Intent and as to the continuation of Industry Traceback Group established by USTelecom – The Broadband Association as the single registered consortium. Comments are due on **June 11, 2025**, and reply comments are due on **June 18, 2025**.

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

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**.

FM Booster Station Origination. On November, 21, 2024, the FCC adopted the [Second Report and Order and Order on Reconsideration](#) in MB Dkt. Nos. 20-401 and 17-105 (as well as RM-11854), addressing broadcaster use of FM booster stations to originate program content and establishing new Rule 74.1206 as well as a new FM Booster Program Origination Notification. Following publication in the May 2, 2025, [Federal Register](#), PRA comments for the new information collection are due on **June 2, 2025**.

Operation of Unmanned Aircraft Systems (“UAS”). On August 21, 2024, the FCC adopted a [Report and Order](#) in WT Dkt. No. 22-323, adopting new rules to “enable UAS operators to access dedicated spectrum for control-related communications with the required reliability. . . and [specifically] provide operators the ability to obtain direct frequency assignments in a portion of the 5030-5091 MHz band.” Following publication in the April 7, 2025, [Federal Register](#), PRA comments on the new information requirements adopted in these rules are due on **June 6, 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 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](#).