



# Reminder: Federal Communications Commission – November and December Filings

November 24, 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, particularly with respect to determining revised deadlines in view of the recent federal government lapse in funding.

## **Notice regarding the effects of the recent U.S. Federal Government Lapse in Funding on filing deadlines.**

Effective 12:00:01 a.m. EDT on October 1, 2025, the FCC suspended most of its operations pending resolution of the appropriations standoff (the “Suspension”). In Public Notices issued on September 30, 2025, and November 13, 2025, certain filing deadlines occurring during the Suspension were extended. Pursuant to a November 17, 2025, **“Revisions To Deadlines” Public Notice** (“RTD Public Notice”), the FCC issued updated guidance regarding deadlines for filings, including certain further extensions. Generally, the first filing deadline in a proceeding that fell between October 1, 2025, and November 17, 2025, inclusive, was extended to November 18, 2025. With limited exceptions discussed in the RTD Public Notice, where a filing’s due date was extended in this manner, the due dates for any subsequent reply or responsive pleadings were extended for an equivalent length of time (to sustain the period between filings within the proceedings).

This advisory includes a list below of certain items with filing deadlines that have been extended as a result of the Suspension (marked accordingly). Prospective filers should carefully review the **RTD Public Notice** as well as any subsequent proceeding-specific notices to determine the revised deadlines for any filings affected by the Suspension. Kelley Drye attorneys are also available to assist with any questions you may have regarding applicable extensions.

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### **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. 911 ANNUAL RELIABILITY CERTIFICATIONS (due December 12, 2025)**

Covered 911 service providers (as defined in Commission Rule 9.19(a)(4)) must certify annually

regarding their compliance with the requirement to take reasonable measures to provide reliable 911 service with respect to: (i) 911 circuit diversity; (ii) central office backup power; and (iii) diverse network monitoring. Certifications shall be filed through the Commission's online portal at <https://apps2.fcc.gov/rcs911/>. Instructions regarding how to file the report and how to register new users in the portal are provided in an August 11, 2025, [Public Notice](#). The RTD Public Notice extended the deadline for this certification filing (usually due on October 15<sup>th</sup>) to **December 12, 2025**.

#### **B. Revisions to November 3, 2025, Form 499-Q Quarterly Telecommunications Reporting Worksheet (due December 18, 2025)**

Carriers and providers of interstate and international telecommunications that seek to revise their November 3, 2025, Form 499-Q filing must do so within 45 days of the Form 499-Q filing deadline, *i.e.*, by **December 18, 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. Quarterly Section 1.767(I) Submarine Cable Licensee Reports (due December 29, 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, such as those licensees identified as being dominant along certain routes in their grants of cable landing authority; 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.

#### **D. Quarterly Sec. 63.10(c) Dominant International Carrier Reports (due December 29, 2025)**

International telecommunications service providers that are classified as dominant along routes to one or more destination markets 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:**

### **1. Proceedings with Extended Filing Deadlines due to the Suspension:**

Pursuant to the [RTD Public Notice](#), the majority of initial rulemaking comments originally due between October 1, 2025, and November 17, 2025, became due on November 18, 2025. Where rulemaking submissions were due prior to the Suspension, responsive filings (*e.g.*, reply comments) originally due during the Suspension also generally became due on November 18, 2025.

In cases where a filing's due date was extended to November 18, 2025, the due dates for any subsequent reply or responsive pleadings generally have been extended for an equivalent length of time. To calculate these extended filing deadlines for reply comments or other responsive pleadings, the RTD Public Notice states:

*Where reply comments or responsive pleadings are permitted with respect to initial filings **with due dates extended by this Public Notice**, the filing deadlines for such reply or responsive pleadings will be extended for a period of time equivalent to the extension provided for initial filing so as to afford responding parties the same amount of time. Thus, for example, if comments in a rulemaking proceeding were originally due on October 15 and reply comments were due fifteen days later, comments are now due on November 18 . . . and reply comments are due fifteen days thereafter on December 3.*  
(RTD Public Notice, p.4)

Please note that the RTD Public Notice included a number of exceptions to the general guideline for extensions. It also states that the Bureaus and Offices may issue further public notices to set further-revised filing deadlines in particular proceedings. Although we have included a few notes below regarding such variances or anomalies, **interested parties should closely review both the RTD Public Notice and the agency releases in the relevant Commission proceedings to confirm applicable extended due dates for any filings they intend to submit.**

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**Disaster Information Reporting System (“DIRS”).** On August 6, 2025, the FCC released the [Third Further Notice of Proposed Rulemaking \(“FNPRM”\)](#) in PS Dkt. Nos. 21-346 and 15-80; ET Dkt. No. 04-35, seeking comment on proposals to ensure continued collection of information necessary for effective disaster response through the DIRS system while (i) streamlining the reporting process to eliminate duplicative or unnecessary data collection; (ii) eliminating the reporting requirement for resellers and mobile virtual network operators; and (iii) incorporating a limited amount of new information with “significant public safety value” into the reports, among other possible reforms. Following publication in the September 2, 2025, [Federal Register](#), comments were originally due on October 2, 2025, with reply comments now due on **December 18, 2025**. [See RTD Public Notice, p. 3, note 6.] *Original date(s) extended due to the Suspension.*

**Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (“TRACED Act”).** On August 27, 2025, the Wireline Competition Bureau released a [Public Notice](#), in WC Dkt. No. 17-97, seeking (i) input for its annual statutory reevaluation of existing undue hardship implementation extensions; and (ii) comment to inform the FCC’s 2025 triennial assessment of “the efficacy of the technologies used for [the] call authentication frameworks” and whether it is in the public interest to revise or replace these frameworks. Following publication in the September 3, 2025, [Federal Register](#), comments were originally due on October 3, 2025, with reply comments due on **October 20, 2025**. *Original date(s) extended due to the Suspension.*

**Supplemental Coverage from Space (“SCS”) Authorization Applications and Waiver Requests.** On September 5, 2025, the Space Bureau, Wireless Telecommunications Bureau, and Public Safety and Homeland Security Bureau (together, the “Bureaus”) issued a [Public Notice](#) in SB Dkt. No. 25-201, ICFS File Nos. SAT-MOD-20250612-00145, SAT-AMD-20250718-00181, and SAT-AMD20250903-00248, requesting comment on the applications for SCS authorization filed (1) jointly by AST & Science, LLC (“AST” *aka* AST Space Mobile) and various indirect subsidiaries of AT&T, AST’s partners; (2) jointly by AST and Cellco Partnership d/b/a Verizon Wireless and its affiliates (“Verizon”); and (3) jointly by AST and First Responder Network Authority (ULS File Nos. 0010538493, 0011607666, and 0011654129). The Bureaus also request comment on waiver requests associated with the applications intended “to allow AST, AT&T, and Verizon to deploy SCS in areas within the Continental United States (CONUS) and Hawaii geographic independent areas (GIAs) where the terrestrial wireless carriers do not hold spectrum and for AST to provide SCS on certified

but not authorized devices.” Filing instructions are provided in the [Public Notice](#). Comments and petitions were originally due on October 6, 2025; responses to comments and oppositions to petitions were due on **October 16, 2025**; and replies to responses or oppositions were due on **October 23, 2025**. *Original date(s) extended due to the Suspension.*

**Business Data Services.** On August 8, 2025, the FCC released a [Notice of Proposed Rulemaking and Third FNPRM](#) in WC Dkt. Nos. 21-17 and 17-144, seeking comment on proposals to update the regulatory framework for incumbent local exchange carriers’ business data services to reflect changes in technology and the marketplace as well as “recent Executive Orders and Commission initiatives.” Proposals include the elimination of (or forbearance from) certain rate regulation and tariffing obligations and other deregulatory steps as well as possible updates to the FCC’s competitive market tests to rely on more current data. Following publication in the September 4, 2025, [Federal Register](#), comments were originally due on October 6, 2025, with reply comments due on **October 20, 2025**. *Original date(s) extended due to the Suspension.*

**E-Rate Program Eligible Services List.** On September 30, 2025, the Wireline Competition Bureau issued a [Public Notice](#) in WC Dkt. No. 13-184, requesting comment on the proposed eligible services list for the schools and libraries universal service support mechanism in funding year (“FY”) 2026. Along with a number of proposed changes, the amended list reflects the removal of Wi-Fi services for school buses and hotspots as eligible services. Comments were originally due on October 15, 2025 with reply comments due on **October 30, 2025**. *Original date(s) extended due to the Suspension.*

**Signal Booster Operations - Petition for Rulemaking.** On September 16, 2025, the Wireless Telecommunications and Public Safety and Homeland Security bureaus issued a [Public Notice](#), requesting comment on the [petition](#) filed by the Safer Buildings Coalition (“SBC”) for a rulemaking to adopt a “comprehensive authorization framework” for obtaining the consent of spectrum licensees for signal booster operations.” The bureaus specifically seek comment on whether improperly deployed signal boosters cause interference to public safety radio communications and, if so, whether the problem is as pervasive as SBC claims, whether SBC’s proposed revisions would be effective in addressing the issue, and whether alternative solutions would be more effective. Comments were originally due, in RM-12009, on October 16, 2025, with reply comments now due, per a separate note in the [RTD Public Notice](#), on **December 18, 2025**. [See RTD Public Notice, p. 3, note 7.] *Original date(s) extended due to the Suspension.*

**Interconnected Voice over Internet Protocol (“VoIP”).** On September 16, 2025, the Wireline Competition Bureau issued a [Public Notice](#), in WC Dkt. No. 25-288, seeking comment on the [Petition for Declaratory Ruling](#) of Far Homes, Inc. d/b/a Tin Can, which requests that the FCC declare the Company’s service (described as restricted access to whitelisted contacts provided through the Public Switched Telephone Network) “does not constitute interconnected [VoIP] for purposes of the applicability of “VoIP-related provisions of Title II of the Communications Act of 1934, as amended.” In the alternative, Tin Can requests a good-cause waiver of regulatory requirements applicable to interconnected VoIP. Comments were originally due on October 16, 2025, with reply comments due on **October 31, 2025**. *Original date(s) extended due to the Suspension.*

**EchoStar Spectrum Transactions (2).** On September 30, 2025, the Wireless Telecommunications Bureau (“WTB”) and the Space Bureau issued two public notices establishing the pleading cycles for EchoStar’s proposed sales of spectrum:

- 1) The [Public Notice](#) in WT Dkt. No. 25-303 addresses the applications of AT&T and EchoStar for assignment of 3.45 GHz and 600 MHz band spectrum and related waivers. Petitions to deny were

due on October 30, 2025; oppositions were due on **November 14, 2025**, and replies were due on **November 24, 2025**. *Original date(s) extended due to the Suspension.*

2) The [Public Notice](#) in GN Dkt. No. 25-302 addresses the applications of Spectrum Business Trust 2025-1, Space Exploration Technologies Corp. (“SpaceX”), and EchoStar for assignment of AWS-4 and AWS-H block spectrum licenses and certain earth station licenses as well as related waivers. In a November 17, 2025 [Public Notice](#), WTB and the Space Bureau temporarily tolled the pleading cycle for the SpaceX-EchoStar transaction, noting receipt of amended applications from the parties. A revised pleading cycle will be announced in a subsequent public notice.

**Alaska Connect Fund (“ACF”).** Pursuant to the November 1, 2024 [Alaska Connect Fund Report and Order and FNPRM](#), which established the ACF high-cost plan for remote Alaska, beginning on January 1, 2027 for eligible mobile-provider participants, the Wireless Telecommunications Bureau issued a [Public Notice](#) in WC Dkt. No. 23-328 on September 30, 2025, requesting comment on the initial Eligible-Areas Map and the Performance Plan Template for the ACF. Comments were originally due on October 31, 2025, with reply comments due on November 14, 2025, **now extended** by a November 19, 2025, [Public Notice](#) with comments due on **December 4, 2025**, and reply comments due on **December 19, 2025**. *Original date(s) extended due to the Suspension and subsequent Public Notice.*

**Eliminating Barriers to Wireline Deployments.** On September 30, 2025, the FCC adopted a [Notice of Inquiry](#) (“NOI”) in WC Dkt. No. 25-253, requesting comment on obstacles that wireline telecommunications service providers experience when seeking access from state and local governments to public rights-of-way, including delays, fees, and in-kind compensation requirements, and whether these factors “have the effect of prohibiting the provision of wireline telecommunications services in violation of section 253.” The NOI also requests commenters to more broadly address additional forms of state and local requirements “that have a prohibitive effect on wireline telecommunications deployments and services within the meaning of section 253” and to suggest specific state or local statutes, regulations, or legal requirements that the Commission should consider for preemption. Comments were originally due on November 17, 2025, with reply comments due on **December 17, 2025**. *Original date(s) extended due to the Suspension.*

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## **2. Filing Deadlines for the following proceedings are not affected by the Suspension:**

**Submarine Cable Security.** On August 7, 2025, the FCC adopted a [Report and Order and FNPRM](#) in OI Dkt. No. 24-523 and MD Dkt. No. 24-524. The Report and Order adopted a number of rules intended to expedite the deployment of submarine cables touching U.S. territory, while at the same time enhancing the security and resilience of these facilities, with particular focus on preventing foreign adversary threats. Building upon these changes, the FNPRM seeks comment on proposals that could significantly alter the submarine cable regulatory framework, including: (i) grant of a blanket license to entities that own or operate Submarine Line Terminal Equipment (“SLTEs”), subject to certain exclusions and routine conditions, such as a tailored foreign adversary annual report; (ii) new certifications and routine conditions related to foreign adversaries to further protect submarine cables from national security risks; (iii) steps to expedite deployment of submarine cables that connect to the United States by presumptively excluding submarine cable applications from referral to the relevant Executive Branch agencies if they meet certain standards; and (iv) requiring existing licensees to remove covered equipment or services from their submarine cable system, within a specified timeframe prior to the expiration of the license.

The FNPRM also requests comment regarding how the Commission can use its authority to incentivize and encourage the adoption and the use of trusted technologies produced and provided by the United States and its foreign allies. Following publication in the October 27, 2025, [Federal Register](#), comments are due on **November 26, 2025**, with reply comments due on **December 26, 2025**.

**Next Gen TV Transition.** On October 29, 2025, the FCC released a [Fifth FNPRM](#) in MB Dkt. No. 16-142, seeking comment on its tentative proposal to eliminate the simulcasting requirement for stations that transition to ATSC 3.0 (Next Gen TV), while continuing to permit simulcasting on a “voluntary, simplified basis.” The FNPRM also requests comment on a number of related issues and aspects of the Next Gen TV transition. Following publication in the November 20, 2025, [Federal Register](#), comments are due on **January 20, 2026**, with reply comments due on **February 18, 2026**. Paperwork Reduction Act (PRA) comments on the information collection requirements proposed in the FNPRM are due on **January 20, 2026**.

### **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](http://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 providing investors, lenders, and communications companies with end-to-end guidance for the legal and practical aspects of ownership, asset and financing transactions, with a particular expertise in helping clients successfully negotiate their way through regulatory due diligence, any Federal, State, or local approvals that may be required, and national security reviews by the Executive Branch agencies (e.g., Team Telecom and CFIUS reviews). For more information, please contact your current Kelley Drye attorney or any member of the [Communications Practice Group](#).