

# Reminder: Federal Communications Commission – September and October 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 August 1, 2025, Form 499-Q Quarterly Telecommunications Reporting Worksheet (due September 15, 2025)**

Carriers and providers of interstate and international telecommunications that seek to revise their August 1, 2025, Form 499-Q filing must do so within 45 days of the Form 499-Q filing deadline, *i.e.*, by **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/>.

#### **B. Annual FCC Regulatory Fees (due September 25, 2025)**

The FCC collects annual regulatory fees from most federal licensees and other regulated entities to offset costs associated with the FCC’s enforcement, public service, policy, and rulemaking activities. Fees vary by type of licensee or operating entity. In several [public notices and related fact sheets](#) issued on September 5, 2025, and in the September 8, 2025, Federal Register publication of the [FY 2025 Regulatory Fees Report and Order](#) (“Report and Order”), the FCC announced that the deadline for payment of FY25 regulatory fees by licensees and other regulatees is **September 25, 2025**. The 2025 Regulatory Fee Schedule for providers of interstate and international telecommunications and telecommunications services (including on a non-common carrier basis), radio frequency spectrum licensees, broadcast licensees, satellite and earth station licensees, and submarine cable operators, among others, is set out in Appendix B to the Report and Order. Additional information, including industry-specific guidance and instructions for the payment process, is provided at <http://www.fcc.gov/regfees>. (See FY 2024 - Who Owes Fees and What Is My Fee.)

- **All regulatory fees are to be paid electronically through CORES.**
- **The FCC will not issue bills for the regulatory fees.** It is the payer’s responsibility to pay the fees it owes based on the Commission’s rules and the Report and Order (regardless of the amount posted in the CORES system).
- **Failure to meet the regulatory fee payment deadline will result in the assessment of late payment penalties, set by statute at 25%.** The FCC does not ordinarily waive late payment penalties.

### **C. Quarterly Section 1.767(I) Submarine Cable Licensee Reports**

**(due September 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; 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 September 29, 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.

### **E. 911 ANNUAL RELIABILITY CERTIFICATIONS (due October 15, 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 the August 11, 2025, [Public Notice](#).

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

### **A. RULEMAKINGS and INQUIRIES**

**Incarcerated People’s Communications Services (“IPCS”).** On August 11, 2025, the Wireline Competition Bureau issued a [Public Notice](#) in WC Dkt. Nos. 23-62 and 12-375, seeking comment on the Public Interest Parties’ July 30, 2025, [Application for Review](#) of the Bureau’s June 30, 2025 Order “suspend[ing] the compliance deadlines for rules adopted in the 2024 Incarcerated People’s Communications Services (IPCS) Order... until April 1, 2027, or any alternative date the Commission

sets as part of further action in the IPCS proceeding.” Oppositions were due on August 29, 2025, with replies to oppositions due on **September 15, 2025**.

**Universal Service Fund (“USF”) Working Group Inquiry.** On August 1, 2025, the bipartisan, bicameral USF Working Group opened a portal for stakeholder comments regarding the state of the USF and preferred strategies to reform and improve the programs. Specific questions are presented via the USF Working Group [portal](#). Comments are due on **September 15, 2025**, to be submitted through the portal or via email to [USFWorkingGroup@fischer.senate.gov](mailto:USFWorkingGroup@fischer.senate.gov).

**NG911 Resiliency, Reliability, Interoperability, and Accessibility.** On March 28, 2025, the FCC released a [Further Notice of Proposed Rulemaking](#) (“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 were 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).

**Priority Access License (“PAL”) Channel Limit - Waiver Request.** On September 5, 2025, the Wireless Telecommunications Bureau issued a [Public Notice](#) in WT Dkt. No. 25-274, seeking comment on the request by Citizens Band License Co. LLC (“CBLC”) and NE Colorado Cellular, Inc. (d/b/a Viaero Wireless) in ULS File No. 0011687350 for a waiver of FCC Rule 96.31(a) (the aggregation limit of up to four PALs in any county-based license area) in connection with a proposed assignment from CBLC to Viaero of ten PALs in Colorado. Comments are due on **September 17, 2025**.

**National Environmental Policy Act (“NEPA”) Regulations.** On August 14, 2025, the FCC released a [Notice of Proposed Rulemaking](#) (“NPRM”) in WT Dkt. No. 25-217, seeking comment regarding how the FCC should revise its rules to “streamline the environmental review process, promote efficiency, and encourage deployment of infrastructure that results in more competition and technological innovation.” The NPRM also requests comment on possible effects upon the FCC’s historic preservation rules and recommendations whether any parts of the current rules should be deleted. Following publication in the August 19, 2025, [Federal Register](#), comments are due on **September 18, 2025**, with reply comments due on **October 3, 2025**.

**Broadband Pole Attachments.** On July 25, 2025, the FCC released the [Fourth FNPRM](#) in WC Dkt. No. 17-84, seeking comment on various proposals intended to facilitate deployment of broadband facilities on utility poles. Following publication in the August 22, 2025, [Federal Register](#), comments are due **September 22, 2025**, with reply comments due on **October 21, 2025**.

**Slamming and Billing Rules.** On July 25, 2025, the FCC adopted an [NPRM](#) in CG Dkt. No. 17-169 and CC Dkt. No. 98-170, seeking comment whether the current carrier change (“slamming”) rules, truth-in-billing rules and billing format rules are still necessary for consumer protection. The NPRM also requests comment on proposals to “modify and simplify” these rules to reduce regulatory burdens. Following publication in the August 22, 2025, [Federal Register](#) and issuance of a concurrent [Public Notice](#), comments are due on **September 22, 2025**, with reply comments due on **October 21, 2025**.

**Section 706 Report to Congress on Broadband Deployment.** On August 8, 2025, the FCC released the [Nineteenth Section 706 Report Notice of Inquiry](#) (“NOI”), in GN Dkt. No. 25-223, seeking “objective data and other evidence reflecting the state of broadband deployment and availability” and requesting a wide range of interested parties “to bring to our attention new issues concerning

the availability of advanced telecommunications capability and recommend new ways to measure deployment and evaluate availability.” The NOI also seeks input regarding possible regulatory barriers to “deployment, expansion, competition, and technological innovation” in advanced telecommunications capabilities. Comments were due on September 8, 2025, with reply comments due on **September 23, 2025**.

**Emergency Alert System (“EAS”) and Wireless Emergency Alerts (“WEA”).** On August 8, 2025, the FCC adopted an [NPRM](#) in PS Dkt. No. 25-224, seeking input for its “reexamination” of the EAS and WEA, particularly addressing the purposes of these alerting systems, their current level of effectiveness and how they might best be modernized to enhance their usefulness while reducing stakeholder burdens. Following publication in the August 26, 2025, [Federal Register](#), comments are due on **September 25, 2025**, with reply comments due on **October 10, 2025**.

**Telecommunications Relay Services (TRS).** On June 27, 2025, the FCC released an [NPRM](#) in CG Dkt. No. 03-123 and RM-11931, seeking comment on the proposed elimination of the FCC rule requiring that Text Telephone (TTY)-based TRS be capable of communicating in the American Standard Code for Information Interexchange (ASCII) format, which the NPRM characterizes as “outdated and rarely used today.” Following publication in the August 27, 2025, [Federal Register](#), comments are due on **September 26, 2025**, with reply comments due on **October 14, 2025**.

**5.35-5.46 GHz Restricted Band Emissions - Waiver Request.** On August 27, 2025, the Office of Engineering and Technology issued a [Public Notice](#) in ET Dkt. No. 25-260, requesting comment on the July 11, 2025, [petition for waiver](#) of Securaplane Technologies, Inc. for a certification waiver of FCC Rule 15.205(a) requirements “to allow its Range Controlled Radar (RCR) system that operates with a center frequency of 5.8 GHz to radiate non-spurious emissions into the 5.35-5.46 GHz restricted frequency band.” The RCR is an intrusion detection sensor installed in aircraft wheel wells. Comments are due on **September 26, 2025**, with reply comments due on **October 14, 2025**.

**Reducing Barriers to Network Improvement and Service Changes.** On July 25, 2025, the FCC released an [NPRM](#) in WC Dkt. Nos. 25-209 and 25-208, seeking comment on “deregulatory options to encourage providers to build, maintain, and upgrade their networks,” including proposals to reduce or eliminate network change filing/notice requirements and proposals for forbearance relief and/or rule revisions to reduce the burdens of telecommunications service discontinuance obligations. Following publication in the August 28, 2025, [Federal Register](#) and issuance of a concurrent [Public Notice](#), comments are due **Sept. 29, 2025**, with reply comments due on **Oct. 27, 2025**

**Disaster Information Reporting System (DIRS).** On August 6, 2025, the FCC released the [Third 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 are due on **October 2, 2025**, with reply comments due on **November 3, 2025**.

**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 are due on **October 3, 2025**, with reply comments due on **October 20, 2025**.

**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”) and various indirect subsidiaries of AT&T; (2) jointly by AST and Celco 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 are due on **October 6, 2025**; responses to comments and oppositions to petitions are due on **October 16, 2025**; and replies to responses or oppositions are due on **October 23, 2025**.

**Business Data Services.** On August 8, 2025, the FCC released an [NPRM 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 are due on **October 6, 2025**, with reply comments due on **October 20, 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](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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**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 a full range of communications business and regulatory issues, including the obligations of affected wireline, wireless, and satellite providers and operators to pay annual FCC regulatory fees. We also assist affected entities with questions arising from obligations to submit a variety of service provider reports, such as the determination of service classifications and associated completion, where applicable, of the FCC's Telecommunications Reporting Worksheet (Forms 499-A and 499-Q). For more information, please contact your current Kelley Drye attorney or any member of the [Communications Practice Group](#).