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Regulatory Review

The Miller Isar, Inc. Regulatory Review is a monthly report designed to provide clients with information regarding regulatory and policy matters that may impact their business operations. The Regulatory Review is provided for informational purposes only and does not constitute legal opinion or legal counsel. Comments and suggestions are always welcome.

FEDERAL REGULATORY NEWS

COMMISSION INITIATES BROADBAND SERVICES NOI

On June 17, 2010, the Commission initiated new proceeding to “identify the legal approach that will best support its efforts to ensure universal access to affordable, high-quality broadband services; promote broadband innovation, investment, and competition; and protect and empower consumers.” The Commission’s Notice of Inquiry begins a public process to consider possible frameworks for addressing the high-speed connections most consumers use to access the Internet. Specific comments are sought regarding whether the Commission’s “information service” classification of broadband Internet service remains legally sound and adequate to support effective performance of the Commission’s responsibilities; the consequences of classifying broadband Internet connectivity as a “telecommunications service” to which all the requirements of Title II of the Communications Act; Chairman Genachowski’s “third way” under which the Commission would reaffirm that Internet content and applications remain generally unregulated under Title I of the Communications Act; identification of Internet connectivity service that is offered as part of wired broadband Internet service as a telecommunications service; and forbearance under Section 10 of the Act from applying all provisions of Title II other than the small number that are needed to implement fundamental universal service, competition and market entry, and consumer protection policies. **Comments are due July 15, 2010.** (GN Docket No. 10-127)

Presentation: [PowerPoint](#)

NOI: [Word](#) | [Acrobat](#)

Genachowski Statement: [Word](#) | [Acrobat](#)

Copps Statement: [Word](#) | [Acrobat](#)

McDowell Statement: [Word](#) | [Acrobat](#)

Clyburn Statement: [Word](#) | [Acrobat](#)

Baker Statement: [Word](#) | [Acrobat](#)

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COMMISSION DENIES QWEST REQUEST FOR CHANGE IN MARKET “STATUS QUO”

On June 22, 2010, the Commission denied a Qwest Corporation request to change the current pro-competition policy status quo for the Phoenix, AZ market. The Commission noted that it had applied a data-driven and economically sound “market power” analysis to determine whether Qwest had demonstrated that the competition policies governing traditional telephone services in Phoenix were no longer necessary. Although the Commission concluded that Qwest failed to demonstrate that it no longer had market power for the relevant services in Phoenix, it acknowledged the significant growth of wireless and residential cable voice services. The Commission indicated that stronger evidence of lack of market power in future proceedings could result in a different outcome. The Wireline Competition Bureau contemporaneously released a Public Notice seeking comment on the application of the *Qwest-Phoenix* framework to two pending proceedings on remand from the D.C. Circuit, one from Verizon regarding six metropolitan areas and another from Qwest regarding four metropolitan areas, as well as future similar requests. (Docket No. 09-135)

News Release: [Word](#) | [Acrobat](#)

MO&O: [Word](#) | [Acrobat](#)

Genachowski Statement: [Word](#) | [Acrobat](#)

Copps Statement: [Word](#) | [Acrobat](#)

McDowell Statement: [Word](#) | [Acrobat](#)

Baker Statement: [Word](#) | [Acrobat](#)

Public Notice: [Word](#) | [Acrobat](#)

WIRELINE COMPETITION BUREAU SETS DEADLINE FOR USF ELECTRONIC-ONLY PAYMENTS

On June 2, 2010, the Commission’s Wireline Competition Bureau (Bureau) announced that it has set August 31, 2010 as the deadline for processing electronic fund transfers of federal universal service fund payments to the Universal Service Administrative Company (USAC). After August 31, 2010, if a recipient of universal service support payments fails to provide the required financial institution information on its FCC Form 498 to enable payment by EFT, USAC will not make universal service support payments to that entity until the entity provides the required information. On September 28, 2009, the Bureau announced that, pursuant to the Debt Collection Improvement Act of 1996 (DCIA), all federal universal service fund support payments must be made by electronic funds transfer. Universal service fund support payments were directed to provide financial institution information and other relevant information on FCC Form 498 (Service Provider Identification Number and Contact Information Form. (DA No. 10-270). (Docket No. 02-6). http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-10-270A1.doc

COMMISSION E-RATE NPRM PUBLISHED IN FEDERAL REGISTER

On June 9, 2010, the Commission published a Notice of Proposed Rulemaking in the [Federal Register](#) seeking comment on several potential reforms to reduce administrative inefficiencies in the E-Rate program by eliminating rules that have not effectively served their intended purpose, while continuing to protect against waste, fraud, and abuse. **Comments are due July 9; replies July 26.**

NECA BROADBAND PAPER URGES MINIMIZATION OF TECHNICAL AND REGULATORY ARBITRAGE

A National Exchange Carriers Association (NECA) [paper](#), “United States’ Broadband Goals: Managing ‘Spillover Effects’ to Increase Availability, Adoption and Investment,” urges the Commission to “minimize opportunities for technological and regulatory arbitrage as new products and services are developed, and to remove the need to continuously update regulation to catch up with technology and the market. The paper addresses a variety of “spillover” scenarios illustrating instances where actions by some users or carriers could affect others. Regarding the federal universal service fund specifically, the paper proposes that Fund contribution methodology should be modified “to ensure it promotes network cost recovery and assures the USF remains sustainable over time.” NECA urged “more research into fund flows between end users, Internet service providers (ISPs), content delivery networks (CDNs), and content providers (CPs), as well as network arrangements among ISPs, CDNs, and backbone transport providers.”

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COMMISSION RELEASES NUMBER PORTABILITY PUBLIC NOTICE

On June 15, 2010, the Commission issued a [Public Notice](#) seeking comments on a petition filed by CenturyLink for waiver of the August 2, 2010 deadline for implementation of one-business day number porting. CenturyLink requests an extension of time until May 1, 2011 to implement the one-business day porting requirement due to the recent merger of CenturyTel with Embarq Systems. CenturyLink is in the midst of integrating two operating systems and claims strict compliance with the August 2010 deadline would be costly, wasteful, and harmful to the public. **Comments due June 29; replies due July 6, 2010.** (WC Docket No. 07-244)

COMMISSION AND FDA SCHEDULE PUBLIC HEALTH TECHNOLOGY MEETING

On June 15, 2010, the Commission and Food and Drug Administration announced that they have [scheduled](#) a joint public meeting on July 26 and 27 to discuss ways to promote investment and innovation in health technology by streamlining government processes. The meeting is a follow up on the National Broadband Plan's recommendation to use the power of broadband to improve health care. [Public Notice](#)

COMMENTS SOUGHT ON LIFELINE AND LINK-UP ELIGIBILITY

The Federal-State Joint Board on Universal Service, on June 15, 2010, released a Public Notice requesting comments on Lifeline and Link-Up Eligibility, Verification, and Outreach Issues Referred to Joint Board. On May 4, 2010, the Commission released an order referring to the Federal-State Joint Board on Universal Service questions regarding eligibility, verification, and outreach rules for the universal service low-income programs. In the *Referral Order*, the Commission asked the Joint Board to recommend changes to the Lifeline and Link Up eligibility, verification, and outreach rules that may be necessary "given significant technological and marketplace changes since the current rules were adopted, based on consideration of: (1) the combination of federal and state rules that govern which customers are eligible to receive discounts through the Lifeline and Link Up programs; (2) best practices among states for effective and efficient verification of customer eligibility, both at initial customer sign-up and periodically thereafter; (3) appropriateness of various outreach and enrollment programs; and (4) the potential expansion of the low-income program to broadband, as recommended in the National Broadband Plan." The Commission requested that the Joint Board prepare a recommended decision regarding these issues and submit its decision to the Commission within six months of release of the *Referral Order*. The Joint Board now seeks public comment on the questions presented in the *Referral Order*. Public Notice: [Word](#) | [Acrobat](#)


STATE REGULATORY NEWS

COLORADO – Governor Vetoes VoIP Dereg Bill

Colorado Governor Bill Ritter (D) has vetoed HB 1281, a bill which would have exempted Public Utilities Commission regulation of interconnected voice over Internet protocol providers, while relaxing regulation of basic local exchange services under certain circumstances. The Governor's veto noted that despite the limited amount of federal and state regulation of VoIP services, enactment was premature, noting "preemptively barring the state from regulating VoIP at this time is unwise, considering activity at the federal level concerning VoIP," particularly in light of the fact that the Federal Communications Commission has not yet established whether VoIP services are information or telecommunications services. "The implications of the classification are wide-ranging and will determine what kinds of regulations are warranted for VoIP. While I am taking no position on whether VoIP is a telecommunication service or about the manner in which it should be regulated, if at all, it is important to permit the FCC the time to make its decisions concerning VoIP," the Governor said. The bill would also have reclassified Qwest Corporation's local exchange service from Part 2 to Part 3 services subject to a relaxed regulatory framework. On this point, the Governor found that the Commission already has authority to reclassify Qwest's service without legislative amendments. Several groups including the AARP had opposed the measure as undermining consumer interests.

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GEORGIA – Telecommunications Reform Bill Enacted

On June 4, 2010, Georgia Governor, Sonny Perdue (R) signed HB 168, a bill that institutes several telecommunications reforms, into law. The new law primarily affects the State's universal service fund, intercarrier compensation and other telecommunications statutes. Under the new law, Georgia's Universal Access Fund (UAF) will be scheduled to sunset. UAF disbursements will be subject to a significantly more restrictive approval process before the Public Service Commission. Originally, the UAF, established in 1995 to compensate rural incumbents for the cost of providing service to high cost areas, was to have been eliminated altogether. The new law also contains provisions governing inter-carrier compensation, and now requires Commission approval before carriers may add billing line items to recoup costs. The Commission is also precluded from asserting jurisdiction over broadband service, voice over Internet protocol, or wireless services.  [PDF Version](#)

ILLINOIS – Telecommunications Deregulation Bill Signed Into Law

On June 15, 2010 Illinois Governor Pat Quinn (D) enacted HB6425, a bill touted as moving the telecommunications industry into market-based regulation. The new law amends the decade old Illinois Telecommunications Act by removing provisions that were deemed archaic and no longer necessary. Among other things, the new law limits Illinois Commerce Commission oversight of wireless, broadband, and voice-over-Internet protocol service providers, and designates all Illinois telecommunications markets "competitive" and eligible for market-based regulation. Carriers subject to market-based regulation are required to provide basic local exchange services under one of three services packages priced at the same rate levels in effect on Jan. 1, 2010. Service packages include a "basic package" consisting of an access line and 30 local calls for \$3.05 in Chicago, \$6.03 in surrounding neighborhoods and \$9.50 in the rest of the state; an "extra package" consisting of an access line and unlimited local calls priced at \$10.00 in Chicago, \$13.00 in surrounding areas, and a "plus package" consisting of an access line, unlimited local calls and the customer's choice of two vertical services offered by the carrier priced at \$16.00 in Chicago, \$19.00 in surrounding neighborhoods, and \$19.85 in the rest of the state. These rates will be frozen for the next three years. The Commission is explicitly prohibited from regulating "rates, terms, conditions, quality of service, availability, classification, or any other aspect of the service," for broadband services; IP-enabled services, including interconnected VoIP service rates, wireless, and information services. The Commission retains authority to certify wireless carriers to provide service in the state and certify them as eligible telecommunications carriers. The Commission scheduled a June 24, 2010 workshop to address implementation methodology.

IOWA –High Volume Access Service Access Rate Rules Adopted

The Iowa Utilities Board has adopted new rules intended to prevent local exchange carriers from artificially increasing switched access rates. Following a September 2009 decision which found that that eight local exchange carriers failed to comply with the terms of their intrastate tariffs and artificially inflated access rates, the Board initiated a rulemaking proceeding to address the effects of high volume access services (HVAS) on local exchange carrier revenues. A HVAS is defined as a one causing "rapid increase in access volumes," or access growth of more than 100% in six months. Under the rules, a local exchange carrier that will add a new HVAS customer must notify interexchange carriers of the telephone numbers that will be used by the HVAS customer, and the expected date the HVAS service will be initiated. An interexchange carrier may then request negotiations concerning the access rates applicable to calls to or from the HVAS customer, under the new rule. The parties must then negotiate "reasonable terms and procedures for the exchange of traffic." If negotiations prove unsuccessful, the Board may be petitioned to set the rate for access services for HVAS traffic based on the incremental cost of providing HVAS service. The Board noted that "HVAS typically results in significant increases in interexchange call volumes and can include chat lines, conference bridges, call center operations, help desk provisioning, or similar operations. These services may be advertised to consumers as being free or for the cost of a long distance call." (Docket RMU-2009-0009)

MAINE – Cable IP Telephony Subject to Commission Regulation, Hearing Examiner Finds

A Maine Public Utilities Commission hearing examiner has concluded that voice over Internet protocol services provided by Time Warner Cable Digital Phone LCC and Comcast Phone of Maine LLC constitute "telephone services" under

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Maine law and are subject to the commission regulation, accordingly. The conclusion follows a two year investigation into whether static or “fixed” VoIP services such as those provided by the two companies are subject to Commission regulation and necessity certificates of public convenience and necessity. Time Warner and Comcast had maintained that their IP-based service is subject to the Federal Communications Commission’s Vonage decision, which preempted state entry and pricing regulation of VoIP services. Comcast argued further that its services are not subject to state regulation under the U.S. Supreme Court’s “Brand X” decision, which affirmed the FCC’s decision that IP-based service offerings would not be subject to traditional telecommunications “common carrier” regulation. Staff and the Maine Public Advocate argued that the Companies’ services were not preempted from state regulation. The hearing examiner found that telephone service is defined as “the offering of a service that transmits communications by telephone, whether the communications are accomplished with or without the use of transmission wires..” under state statute. On this point, the hearing examiner concluded “... that the statutory language defining ‘telephone service’ is broad, unambiguous, and readily encompasses digital VoIP service.” Regarding the matter of federal preemption, the hearing examiner cited to an Eighth Circuit decision regarding the FCC Vonage preemption order on appeal where the court had noted the “practical impossibility of severing the intrastate from the interstate aspects of nomadic VoIP service” that permitted the federal preemption of state regulation in the Vonage proceeding. The Hearing examiner was further persuaded by the fact that fixed VoIP services are considered a substitute for traditional, circuit-switched telephone service, noting that consumers could not effectively tell the difference between conventional telephony and the VoIP services provided by the companies. On June 10, 2010, Comcast filed a motion to delay a decision on the matter for 30 to 45 days in order to hold oral argument on the hearing examiner’s ruling before the Commission issued a final decision in the matter. Comcast’s motion was denied. (Docket 2008-421)

MICHIGAN – Carriers Oppose State USF Contribution Calculations

Michigan carriers, in comments filed with the Michigan Public Service Commission, are objecting to the Commission’s state universal service fund (USF) contribution calculations that have based the current contribution factor of 0.431% on 2008 revenues rather than current revenues. On May 17, 2010, the Commission proposed the state USF contribution factor in accordance with 2008 revenue data submitted by carriers earlier this year following enactment of a new law limiting switched access rates. The Commission had requested revenue data in January to establish new access rules and the total size of the intrastate switched toll access rate restructuring mechanism. The monthly contribution factor was then based on one twelfth of a provider’s 2008 intrastate telecommunications services revenues ... multiplied by the contribution factor.” The carriers argued that 2008 revenue data was now stale, and did not reflect the decline in wireline revenues experienced since. They argued that carriers would effectively be over compensating the USF. The carriers urged the Commission to allow contributions to be based on current revenues. Smaller competitive carriers argued that the methodology was discriminatory and not competitively neutral. According to the companies, providers who were authorized to provide service prior to 2009 would bear a disproportional compensation burden. The first contribution payment is due in September 2010. (Case No. U-16183)

MICHIGAN – Commission Report Finds Increase In CLEC Market Share

A report released by the Michigan Public Services Commission regarding the status of the State’s telecommunications industry finds that wireline lines served by competitive local exchange carriers accounted for 24.2% of total wirelines in 2009, an increase of 4.2% over the previous year. The report reflects the results of a survey conducted of 40 incumbent and 129 competitive local exchange carriers in the State. According to the report, 3,907,129 wirelines were served in 2009, a reduction of almost 300,000 lines from 2008; 947,068 lines were provided by competitors through their own facilities, through unbundled network element loops, local wholesale arrangement, and resale of incumbent providers’ services in 2009; AT&T Michigan accounted for the largest share of total wirelines in 2009 at 60.8%, although the incumbent continues to lose share. AT&T’s market share of wirelines fell from 64.2% in 2008 and from a high of 81% in 1999. Verizon held 10.7% of wirelines in 2009, down from 11.5% in 2008, but relatively stable from 11.5% in 1999.

MINNESOTA – Commission Sets TAM Rate

On June 1, 2010, the Minnesota Public Service Commission approved the fiscal year 2011 Telecommunications Access Minnesota (TAM) surcharge at \$0.10 per month for each wired and wireless access line and connection in Minnesota. The new surcharge is to become effective on the first day of the first billing cycle on or after August 1,2010. Local

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exchange service providers were directed to reflect this surcharge in their tariffs. No change is needed unless the provider lists the specific rate in its tariff. (Docket Nos. P-999/M-10-5 and P-999/M-10-212)

MISSOURI – Industry Association Seeks Clarification on Minor Complaint Process

The Missouri Telecommunications Industry Association (MTIA) has asked the Missouri Public Service Commission to clarify that current informal Commission complaint resolution and mediation procedures should apply to small complaints just as they do with other larger formal complaints. The request responds to a March 24, 2010 Missouri Commission proposed rule that create a separate complaint process for “small (consumer) complaints,” those involving disputes of \$3000.00 or less, through adoption of new Sections 13 and 14 under 4 CSR 240-2.070. Small complaints would carry separate filing and response deadlines and case assignment and hearing procedures. Although MTIA stated that it generally supported the new rules, the association maintained that a potential conflict might exist because the proposed rules do not contain an informal complaint prerequisite. The association maintains that a clarification is needed to maintain consistency with Commission rules that complaints over the reasonableness of rates, or charges of utilities must signed by at least 25 consumers or purchasers of the service MTIA noted that the proposed rules would allow a small formal complaint to be filed by a single customer. MTIA maintains that the rule should be amended to continue to apply the 25-signatory requirement for filing small formal complaints. The Commission was also urged to incorporate language allowing parties in small complaint hearings to participate by telephone, in order to reduce costs and travel expenses and clarify that either party to the complaint may object to the use of the small formal complaint procedure. (Case No. AX-2010-0249)

NEW YORK – Commission Merger Authority Legislation Mulled By Committee

The New York Assembly Corporations, Authorities, and Commissions Committee met in mid June to consider AB 2208, a bill that would expand the Public Service Commission's regulation of mergers and acquisitions in the telecommunications industry. Under the bill, a percent of the financial "benefits" of a telecommunications merger or acquisition would be allocated to either ratepayers or in-state infrastructure investment. For any merger or acquisition with having a \$200M or more gross revenue impact to be approved, the Commission would have to ensure that there would be short-term and long-term economic benefits to ratepayers; that the transaction would maintain or improve the financial condition of the resulting telephone corporation and not unreasonably allocate debt to a divestiture entity created from an existing telephone corporation; maintain or improve service quality; is fair and reasonable to both union and nonunion employees; provides benefit to state and local economies; and would not adversely affect competition. The Commission would also have to consider "reasonable alternatives," to the transaction and determine whether comparable short-term and long-term economic savings could be achieved through other means while "avoiding possible adverse consequences" of the transaction. The measure has failed to pass in the last three legislative sessions.

OHIO – Telecommunications Deregulation Bill Enacted

Ohio Governor Ted Strickland (D) has signed SB 162, a bill touted as modernizing the State's telecommunications statutes, into law. Under the new law, Ohio's utilities code is streamline. Several telecommunications reporting requirements are removed and alternative-regulation rules for telephone companies repealed. The new law also explicitly precludes the Public Utilities Commission from regulating interconnected voice-over-Internet-protocol service and limiting jurisdiction over wireless service. The new law also simplifies the certification process for some local exchange carriers, clarifies unfair or deceptive practices and regulations for the industry, and amends Ohio service withdrawal, Lifeline service, and rates, terms and conditions rules for certain services, while providing the Commission with additional investigative and enforcement authority. Ohio's Office of Consumer Counsel and other consumer advocate groups had originally opposed the bill, arguing that it had the potential to erode service quality standards for telephone companies. Many of the concerns expressed by opponents were addressed in the final language, though consumer interests expressed disappointment over provisions that allow telephone companies to raise rates up to \$15 per year, beginning in 2012.

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WISCONSIN – Commission Directs AT&T To Amend CLEC Collo Rates

The Wisconsin Public Service Commission has directed AT&T to amend its process for calculating rates associated with providing power in collocated spaces. The Commission’s order adopts a new rate calculation methodology for providing 48 volt power access to competitors under new, successor, or current interconnection agreements based on usage rather than on AT&T’s billing in accordance with ordered current consumption. In September 2009, CLECs TDS Metrocom LLC and McLeodUSA Telecommunications Services, Inc., d/b/a PAETEC Business Services had petitioned the Commission to initiate an investigation into AT&T billing practices for power provided at collocations. The CLECs argued that AT&T’s billing methodology was discriminatory and required the companies to pay more than AT&T pays for use of the same power in its equipment. According to the CLECs, AT&T collocation power rates in Wisconsin exceeded rates in Georgia, Illinois, Minnesota, and Texas by degrees ranging from 160% to 317%. The Commission concluded that AT&T’s billing on ordered power does not apportion costs among users and reasonably reflect the costs caused by various users. The new pricing methodology developed by staff, is consistent with federal Total Element Long Run Incremental Cost pricing standards, and now divides the forward-looking cost of providing power by the projected total number of units that AT&T is likely to provide to itself and collocators. The new rates now include a \$12.44 charge for DC power plant, usage and HVAC (per amp of usage) for power arrangements of less than 50 amps, and a rate of \$11.08 for DC power plant usage and HVAC (per amp of usage) for power arrangements of 50 amps or more. (Docket 6720-TI-221)

COMPLIANCE REPORTING JULY

The following report listing has been compiled from past reporting requirements and is provided exclusively for informational purposes. Reporting requirements are subject to change and should be verified by filers.

FEDERAL REPORTS DUE IN JULY

International Traffic Data due July 31

REPORTS DUE IN JULY

Due Date	Jurisdiction	Report Name
July	Alaska	Access Minutes Report
July	Alaska	Carrier and Area Specific Bulk Billed Report
July	Missouri	Relay Missouri Statement
July	Rhode Island	Telecommunication Education Access Fund
July	Rhode Island	Telecommunications Relay Service Report
July 1	Idaho	ID Universal Service Fund Form
July 1	Nevada	Annual Revenue & Assessment Report
July 1	Rhode Island	Revenue Reporting Form (and Changes in Statement of Business Operations)
July 1	Rhode Island	Telecommunications Provider Annual Invoice
July 5	Oklahoma	Oklahoma Universal Service Fund Annual OKUSF Assessment True-up

Due Date	Jurisdiction	Report Name
July 10	Alaska	Alaska Telecommunications Relay Services Fund - Remittance of Surcharges Collected
July 10	Arkansas	State of Arkansas Universal Service Fund
July 10	California	Combined California PUC Telephone Surcharge Transmittal
July 10	California	Employee Compensation, Dues, and Subscriptions
July 10	Georgia	Local Service Indicators Data Requests
July 10	New York	Service Quality Performance
July 15	Alabama	Revised Survey of Competitive Local Exchange Carriers
July 15	Alaska	Annual Filings by Non-Pooling Companies ("Section 705 Report")
July 15	California	Quarterly Fee Statement for CPUC Utilities Reimbursement Account
July 15	Florida	Competitive Local Exchange Carrier (CLEC) Data Request
July 15	Florida	Florida Telecommunications Relay, Inc. (FTRI) Monthly Surcharge Collection Report
July 15	Georgia	Georgia Telecommunications Relay Service (TRS) Monthly Surcharge Collection Report
July 15	Georgia	Revised Universal Access Fund Quarterly Deposit Report
July 15	Kansas	Kansas Universal Service Fund 2004/2005 Wireless and Wireline Carrier Remittance Worksheet
July 15	Kentucky	Commonwealth of Kentucky Telecommunications Relay Service Fund Telecommunications Devices for the Deaf Distribution Fund

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Due Date	Jurisdiction	Report Name	Due Date	Jurisdiction	Report Name
July 15	Kentucky	Commonwealth of Kentucky Universal Service Fund	July 25	Minnesota	Minnesota Annual 911/TAM/TAP Fees Report Form
July 15	Maryland	Gross Operating Revenues Derived from MD Intrastate Operations	July 25	Texas	Texas Universal Service Fund Worksheet
July 15	Nebraska	Nebraska USF & E911 Remittance Worksheet	July 30	Alaska	Regulatory Cost Charge Quarterly Return
July 15	Nevada	Nevada Universal Service Fund Carrier Remittance Worksheet	July 30	Colorado	Low Income Telephone Assistance Program
July 15	North Carolina	North Carolina Access Line Report - Rule 17-2(K)	July 30	Connecticut	Quality of Service, Semi-Annual Report
July 15	North Carolina	Questions for Competing Carriers Report	July 30	Georgia	Quarterly Report of Georgia Operations (no formal name)
July 15	Oklahoma	State of Oklahoma Universal Service Fund Carrier Remittance Worksheet	July 30	Illinois	Section 757, Exhibit A LEC Quarterly Report to Commission
July 15	Pennsylvania	Pennsylvania Universal Service Fund, FY2004 Carrier Remittance Monthly Worksheet	July 30	Mississippi	Mississippi Dual Party Fund Statement of Revenues
July 15	Pennsylvania	Slamming Cramming Complaint Form	July 30	Nebraska	State of Nebraska Dual Party Relay Surcharge Form
July 15	Puerto Rico	Puerto Rico Universal Service Fund July 2004 - December 2004 Carrier Remittance Worksheet	July 30	Nevada	TDD Surcharge for Assistance to Persons With Impaired Speech or Hearing Report Form
July 15	Rhode Island	E911	July 30	Puerto Rico	Income Statement of Telecommunications Companies
July 15	South Carolina	The Public Service Commission of South Carolina SC Dual Party Relay System Invoice	July 30	Puerto Rico	Informe de Revendedores de Servicio (Reseller List)
July 15	Utah	Legislative Information Report	July 30	South Carolina	SCPSC CLEC Quarterly Service Quality Report
July 15	Vermont	Vermont Universal Service Fund Carrier Remittance Worksheet	July 30	Tennessee	Wireline Activity Tennessee-CCN Authority
July 15	Virginia	Telecommunications Relay Service Monthly Report	July 30	Vermont	Monthly Disconnect Report
July 20	Alaska	State of Alaska Universal Service Fund Monthly Carrier Remittance Worksheet	July 30	Vermont	Vermont Service Quality Performance Index Report
July 20	Arizona	Arizona Universal Service Fund Carrier Remittance Worksheet	July 30	Virginia	Semi-Annual Economic Reporting Requirements for CLECs
July 20	Colorado	CO Telecommunications Relay Service Surcharge	July 30	Virginia	Service Quality Report
July 20	Idaho	Idaho Telecommunications Service Assistance Plan (ITSAP)	July 30	Wyoming	Telecommunication Companies Revenue & Assessment Report (Wyoming Universal Service Fund)
July 20	New Hampshire	Telecommunications Relay Service Remittance	July 31	Hawaii	Public Utility Fee Bill
July 20	North Carolina	Service Quality Objectives Report	July 31	Hawaii	State of Hawaii PUC Telecommunications Relay Service Worksheet
July 20	Pennsylvania	Remittance Form for Monthly Telecommunications Relay Service (TRS) Surcharge Collections	July 31	Oregon	Oregon Telephone Assistance Program Reimbursement Form
July 20	Utah	Utah Universal Service Fund Surcharge Remittal Statement	July 31	Virginia	Geographic Areas Served in Virginia
July 20	Washington	Telecommunications Relay Service, Washington Telecommunications Assistance Program, and E911	AD HOC REPORTS		
July 21	New York	TAF Adjustment Input Form	Ad hoc	California	Service Quality Pursuant to G.O. 133(B)
July 21	New York	Targeted Accessibility Fund Monthly Online Reporting Form	Ad hoc	Federal	499Q <i>de minimis</i> determination notice
July 21	Oregon	Residential Services Protection Fund Surcharge Remittance Form	Ad hoc	Federal	Communications Assistance for Law Enforcement Act (CALEA), System Security and Integrity compliance Policies and Procedure Manual
July 22	Arkansas	Arkansas Intrastate Carrier Common Line Pool Report	Ad hoc	Federal	Designation of Agent for Service of Process

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Ad hoc	Federal	FCC CORES Registration, CORES Update/Change Form, CORES Certification Form
Ad hoc	Federal	International Settlements Modification Request
Ad hoc	Federal	Network Outage Reporting
Ad hoc	Federal	Notification of Change of Name
Ad hoc	Federal	Operating Agreements and Contracts
Ad hoc	Florida	Service Quality Report
Ad hoc	Idaho	ID TRS Fund Form
Ad hoc	Louisiana	Affidavit of Compliance Louisiana Underground Facility/Utility Damage Prevention Law
Ad hoc	Louisiana	Technical/Market Trial Report
Ad hoc	Nebraska	Change of Address/Contact Information form
Ad hoc	New Hampshire	Contact Information Sheet
Ad hoc	New York	(Targeted Accessibility Fund) Annual Forecast Report Form
Ad hoc	New York	Emergency Plan
Ad hoc	Oregon	Oregon Universal Service Identification Worksheet
Ad hoc	Pennsylvania	Supplier Company Contacts
Ad hoc	South Carolina	Authorized Utility Representative Information
Ad hoc	Texas	Outage Report
Ad hoc	Wyoming	Update Form
Ad Hoc	Wyoming	WY USF Assessment True Up Form
Ad hoc	Federal	Notification of Affiliation with a Foreign Carrier
Certification Anniversary	Tennessee	Small and Minority Owned Telecommunications Business Participation Plan
fiscal year	Alaska	Annual Operations Report
fiscal year	Alaska	Annual Operations Report Form
fiscal year	Louisiana	Annual Financial Reports
fiscal year	Puerto Rico	Annual Gross Income Statement of Telecommunications Companies
Non-Commission	North Carolina	Telecommunications Relay Service Fund Report
Non-Commission	Washington	Washington Telecommunications Relay Service and Telephone Assistance Program
Notification	Arkansas	Annual Affidavit of Switchless Reseller to the Carrier Common Line Pool
Notification	Nebraska	Nebraska Universal Service Fund Contact and Revenue Information
Notification	Tennessee	Lifeline/Linkup Survey
Notification	West Virginia	WV Gross Receipts Revenue Report
Post Certification	Federal	Designation of Agent for Service of Process
Post Certification	Oregon	Oregon Universal Service Identification Worksheet
Regional	Idaho	911 Surcharge Report

MILLER ISAR NEWS

Miller Isar, Inc. is completing a multi-state Qwest regulatory certification and separate four-state certification project. The firm was also engaged to prepare comments to the Federal Communications Commission regarding promulgation of new rules governing the provision of video relay services.

MILLER ISAR, INC. ONLINE

Miller Isar, Inc.'s web site is designed to provide clients and the public with access to important regulatory information. Please visit us at www.millerisar.com, and now on Facebook and Twitter

For additional information, please contact Andrew Isar at aisar@millerisar.com, or 253.851.6700