



SMALL COMPANY COALITION

WE BUILT IT, WE MAINTAIN IT, WE VALUE IT!

**Before the
Federal Communications Commission
Washington, D.C. 20554**

Notice on “Information Collections Being Submitted for Review and Approval to Office of Management and Budget,” Agency/Docket Numbers: OMB 3060-0233, 3060-0804, 3060-0819, 3060-1126, FR ID 134448

**Comments of
The Small Company Coalition**

The Small Company Coalition (“SCC”) appreciates this opportunity to engage in dialogue that is very meaningful to our organization, as we have worked to build the record on reducing the federal regulatory burden since our inception in 2012. While we support measures of transparency from recipients of publicly managed funding, we advocate for a balance to be struck between necessary regulation and the understanding that small companies’ resources are best utilized in providing broadband service and serving our communities. Any imbalance in this equation that leans toward over-regulation ultimately reduces the resources available for deploying broadband facilities in the ongoing effort to ensure that rural Americans are not left on the wrong side of the digital divide.

As general proposals, the SCC encourages the Commission to consider, 1) Streamlining regulations that may comprise duplicate information contained in other filings, or in some cases, with state agencies (in addition to federal); 2) Reducing semi-annual filings to annual, where possible; and 3) Working with relevant federal and state agencies to consolidate filing locations into one hub—as it currently stands, companies submit filings in several manners (electronic, paper) across a host of locations (various federal and state websites, as well as traditional mail).

To provide additional context for the suggestions made above, the SCC is providing specific feedback on a number of federal forms/filings as an attachment with these comments. We thank the FCC for its continued action on this issue and would be more than happy to discuss this important matter in more detail if the Commission so desires.

Respectfully submitted,

James J. Kail

Executive Committee Member

**SMALL COMPANY COALITION
FCC COMMENTS RE: REGULATORY BURDEN**

Name of Filing: CIC Report	Filing Due Date: January 31 & July 31	Information Reported: Long-distance CICs	Submit To: SOMOS	Suggested Change/Comments: One filing per year should be sufficient since changes only occur when a CIC is either pulled or given back.
FCC Form 502	February 1 & August 1	The number of NPA NXXs active, reserved, disconnected, and forecasted	NANPA	One filing per year should be sufficient since changes only occur when a CIC is either pulled or given back.
Forecast Line count	April 30	Forecast Line Count in NECA	NECA	Consider combining this filing with the FCC's Form 507.
FCC Form 507	May 31	Line Count	NECA	Consider combining this filing with the Annual Forecast Line Count Data collection. Furthermore, this filing might be more easily submitted directly through USAC.
CPNI Certification	March 1	Annually reported	FCC - ECFS	Consider eliminating this filing altogether since it merely certifies that the carrier is in compliance with the CPNI requirements.
FCC Form 508	March 31	Annually CAF BLS Forecast for support	NECA	This filing may be more easily submitted directly through USAC.
Study Area Boundaries	March 31	Annual Study Area Boundaries	FCC - CORES	Consider eliminating this filing since there normally aren't any changes to the Study Area Boundaries.
Recordkeeping compliance	April 1	3 certifications for recordkeeping compliance	FCC	Consider eliminating these certifications since good recordkeeping is a normal business practice.
FCC 254 (g)	May 1	Long-distance certification	FCC - ECFS & USPS Mail	Consider eliminating this filing since it's outdated. If the filing does remain, sending a paper copy is unnecessary, and it could be more efficient to file directly on the FCC website or through USAC.
FCC FORM 395	May 31	EEO Filing	FCC	This filing is a formality for small carriers that normally have minimal employee turnover and the same information is submitted with each filing.
Performance Measuring Module (PMM) testing	Every quarter (April, July, October, January) testing each month for 7 consecutive days from 6 p.m. to midnight for the best test results for the quarterly filings.	Monthly testing of download and upload speed & latency for randomly chosen subscribers. We are able to keep those randomly chosen subscribers for 2 years unless disconnection or request for removal of the equipment happens prior to the two years, at which point, a new subscriber must be chosen.	USAC - High Cost	This process is very time-consuming and expensive, requiring the services of a third-party vendor to do the testing each month and then review the test results. There are a lot of man-hours involved in pulling randomized subscribers, calling them to ask if they want to participate, and then rolling a truck for installation of the testing equipment. Also, considerable time is spent to report the DS/US/Latency quarterly. Consideration should be given to eliminate the PMM process for small carriers, as our companies are based in the communities that we serve and engage closely with our customers. If we don't provide the service that we market to them, our customers let us know directly.