

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Completing the Transition to Electronic Filing,)	WT Docket No. 19-212
Licenses and Authorizations, and)	
Correspondence in the Wireless Radio)	
Services)	

COMMENTS OF VERIZON

The Commission’s recent efforts to modernize its filing and information retention systems have greatly improved public access to data, decreased costs for applicants and consumers, and improved efficiency for both the Commission and the companies it regulates. But more can be done. First, the Commission should update its electronic filing systems¹ to allow for as many filings as possible to be made electronically. Second, the Commission should allow applicants² to receive FCC notifications electronically. Finally, the Commission should make a few other minor changes to its systems that will facilitate applicants’ use of those systems. Collectively, these small changes to the Commission’s electronic filing systems will increase efficiency and decrease costs for both the Commission and applicants while also improving access to the Commission’s systems and data.

¹ For purposes of this filing, Verizon is using the term “electronic filing systems” to refer to the Commission’s Universal Licensing System (ULS), Antenna Structure Registration System (ASR), the Tower Construction Notification System (TCNS), and the Electronic Section 106 System (“E-106”).

² For purposes of this filing, Verizon is using the term “applicant” to refer to all licensees, applicants, registrants, Tower Notifiers, and any other users of the Commission’s electronic filing systems.

I. THE COMMISSION SHOULD ALLOW ELECTRONIC FILING FOR ALL WIRELESS RADIO SERVICES APPLICATIONS AND PLEADINGS.

While the majority of FCC filings can be made electronically, a number of applications and filings cannot currently be completed in the Commission's electronic filing systems.³ For example, applicants cannot currently file two-step transactions, subleases, pre-close leases, and certain requests for special temporary authorization (STA) in the Commission's ULS. Lessees also cannot currently assign or transfer control leases in ULS. Instead, these applications must be filed on paper in Annapolis Junction. The office there then must forward the application to the appropriate FCC staff for processing. And the applicant must wait for a return package to ensure the application was filed. This manual paper process not only increases preparation and delivery costs for applicants but also decreases the FCC's efficiency in receiving, processing, and acting on these applications.

The Commission thus should consider reviewing its systems to determine whether they, particularly ULS, can be updated to facilitate the electronic filing of at least some of these applications. For example, the Commission might be able to update ULS to allow for two-step transactions to be identified and described on a single form rather than requiring two separate applications—one electronic and one paper—to complete the transaction. ULS also could be updated to incorporate Lease IDs so that lessees could assign leases electronically. Other updates could potentially be made to allow for the electronic filing of subleases and STAs. In considering these updates, however, the Commission should be careful to not make changes that would increase the likelihood of user error. The Commission, for example, should not recode

³ See *Completing the Transition to Electronic Filing, Licenses and Authorizations, and Correspondence in the Wireless Radio Services*, Notice of Proposed Rulemaking, WT Docket No. 19-212, FCC 19-87, at n.16 (Sept. 6, 2019) (“*NPRM*”).

ULS to eliminate the license dropdown box that allows applicants to only work with licenses they already hold. There's a high risk for error in manually entering call signs for every transaction, and staff would have to validate every single application filed for whether the parties had a legal right to do with the call signs named and to check for typos. Such an approach would significantly slow down processing for all applications and could result in significant problems for licensees not involved in the filed application.

To the extent ULS cannot be updated to allow for these types of applications, or an update to ULS to allow for such applications would increase the likelihood of mistakes being made in other applications, the Commission should implement an alternative electronic process. In particular, the Commission could create a new webform to accept non-standard applications filed as PDF forms. This approach would allow these types of applications to be filed immediately, with a confirmation of filing provided by the system electronically. This approach also could allow the webform to automatically notify the correct staff that a non-standard application has been received. The Commission staff could still review the applications prior to processing but the applicants would no longer have to ship applications to the Secretary's office overnight and wait for confirmation of filing from third party delivery services. And the Secretary's office would no longer have to sort through applications and direct them to the correct staff located in different locations. At a minimum, the Commission could create an email address where PDF versions of these applications could be sent.

The Commission similarly should allow for electronic service of any pleadings related to a wireless radio services application.⁴ Currently, the Commission's rules require service to be

⁴ *NPRM* ¶ 10.

manual unless the party agrees otherwise.⁵ Paper service, however, delays an applicants' receipt of pleadings impacting their applications and licenses. Electronic service will allow applicants and filers to more quickly and efficiently receive, consider, and respond to such pleadings without imposing a hardship on the vast majority of filers. To the extent requiring electronic service would pose a hardship for a particular filer, that filer could file a waiver request.

II. THE COMMISSION SHOULD PROVIDE LICENSING AND APPLICATION UPDATES ELECTRONICALLY.

The Commission also should move towards providing licensing and application updates and letters electronically to applicants. As the *NPRM* notes, the Commission printed and mailed approximately 150,000 notices and letters to applicants in 2018.⁶ This manual paper process not only imposes significant costs on the Commission, but also on applicants and on the environment. Applicants that receive paper notices typically receive them at a central mail facility and it can then take days (or longer) for a notice to make its way to the appropriate employee for handling. Paper notices are also difficult to incorporate into any electronic systems that applicants may use for licensing compliance and application monitoring. Electronic delivery of these notices and letters will allow applicants to immediately receive and then, if necessary, route the notice to the appropriate employee so they can quickly and appropriately respond to the FCC communication. Even if the Commission decides to maintain some form of paper delivery of FCC notices, the Commission should, at a minimum, allow applicants to opt-out of that paper delivery and instead request electronic delivery

In implementing this proposal, the Commission should include as much information in both the subject line and the text of the email as possible. This information will facilitate

⁵ See 47 C.F.R. § 1.47(d).

⁶ See *NPRM* ¶¶ 20, 23, 25.

applicants' ability to process and respond to Commission communications. For example, the email subject line should include a description of the action (e.g., Dismissed, Returned, Granted) as well as the application type. The body of the email should, in turn, include the file number, Applicant name(s) and FCC Registration Numbers (FRNs), and a list of any relevant call signs. Ideally, a PDF copy of the letter or notice would be attached to the email. The Commission, however, could also include a direct link to the communication in the body of the email provided the recipient does not subsequently need to log into the electronic filing system to access the document.

III. THE COMMISSION SHOULD ENCOURAGE INDIAN TRIBES, NATIVE HAWAIIAN ORGANIZATIONS, AND STATE HISTORIC PRESERVATION OFFICES TO USE ITS TCNS AND E-106 SYSTEMS.

Although the Commission's TCNS and E-106 systems provide a mechanism for applicants to notify and communicate with Indian Tribes, Native Hawaiian Organizations (NHOs), and State Historic Preservation Offices (SHPOs), many of these entities prefer not to use the Commission's systems. For example, some Indian Tribes and NHOs may be hesitant to use TCNS because information entered into that system is not private and can be accessed by other users of the system. And SHPOs may be prohibited from using E-106 because it does not meet their state laws for document generation, tracking, and retention. Prior to mandating use of either of these systems, the Commission should work with these entities to ensure their concerns regarding how the systems are structured are addressed.

In the interim, the Commission can make several changes to these systems to make them more user-friendly. The method for accessing attachments in E-106, for example, is very cumbersome and time-consuming. If the system would permit viewing of the submission packet as one long PDF, the SHPO could quickly scroll through the entire filing rather than having to individually click on each attachment file separately, making it easier for them to review and

assess. Similarly, in TCNS, Indian Tribes and NHOs cannot currently upload attachments to their filings. Updating TCNS to permit Indian Tribes and NHOs to upload their responses as an attachment would allow them to better sync with their own tracking systems and would allow them to provide responses on official tribal letterhead. The Commission should also allow communications with Indian Tribes and NHOs to include links to the appropriate documentation in TCNS or E-106. Currently, applicants must attach large files with all of the documentation to these email communications, increasing the size of both outgoing and incoming email communications and ultimately filling up parties' inboxes. Permitting links to the correct documentation both would eliminate this data storage requirement (on both sides) and would provide Indian Tribes and NHOs with an easy way to access this documentation at a later date.

Finally, the Commission should eliminate the incentive for Indian Tribes and NHOs to receive paper documentation. Currently, Indian Tribes and NHOs who receive only electronic documents can be referred on the 31st day while Indian Tribes and NHOs who receive only mailed or both mail and email document can be referred on the 36th day. This deviant timing encourages Indian Tribes and NHOs to request paper documentation as it provides them with additional time to review. The Commission should eliminate this incentive to continue to use paper documentation and instead establish a single time frame for review, regardless of whether the Indian Tribe or NHO receives documentation on paper or electronically.

IV. THE COMMISSION SHOULD MAKE OTHER MINOR CHANGES TO ITS PROCESSES TO FACILITATE APPLICANT AND COMMISSION EFFICIENCY.

Several other changes to the FCC's processes and systems would similarly improve efficiency for both applicants and the Commission. For example, the Commission should update the Commission Registration System (CORES) system to allow FRN Administrators to add and remove individuals' access to multiple FRNs at the same time. This management currently must

be done individually for each FRN. As a result, this process can be quite cumbersome for companies with numerous FRNs when employees join, leave, or switch roles within the company. The Commission also should require applicants and other entities using the Commission's electronic systems to have a minimum of two email addresses on file.⁷ Dual email addresses will ensure that the Commission and other entities will always have a back-up email address they can use if one does not work for some reason.

V. CONCLUSION.

In recent years, the Commission has greatly improved public access to data, decreased costs for applicants and consumers, and improved efficiency for both the Commission and the companies it regulates by modernizing its filing and information retention systems. By implementing these additional suggestions, the Commission can do even more to improve the efficiency of its own and those of its regulatees' processes.

Respectfully submitted,

/s/

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⁷ See *NPRM* ¶ 15.