

**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	)	

**REPLY COMMENTS OF AT&T SERVICES, INC.**

AT&T Services, Inc., on behalf of its affiliates (“AT&T”) hereby submits these reply comments in response to the Commission’s *Notice of Proposed Rulemaking* (“NPRM”) seeking comment on various efforts to streamline and modernize its online filings, specifically the Universal Licensing System (“ULS”), Antenna Structure Registration database (“ASR”), Tower Construction Notification System (“TCNS”), and Electronic Section 106 System (“E-106”).<sup>1</sup> The record developed in this proceeding so far echoes AT&T’s and others’ call for broader modernization and reform of ULS.<sup>2</sup> In addition, in these reply comments AT&T joins Verizon’s call for the development of an electronic submission process for certain non-conforming applications.

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<sup>1</sup> *Completing the Transition to Electronic Filing, Licenses and Authorizations, and Correspondence in the Wireless Radio Services*, Notice of Proposed Rulemaking, FCC 19-87 (Sept. 3, 2019) (“NPRM”).

<sup>2</sup> As AT&T indicated in its opening comments, the Commission has proposed various requirements that would not impact AT&T because AT&T is already taking the actions the Commission proposes to require, such as maintaining an up-to-date email address on its FCC licenses. On these proposals, AT&T takes no position.

## **I. COMMENTERS SUPPORT ACTIONS TO MODERNIZE ULS BEYOND THOSE PROPOSED BY THE COMMISSION.**

In its opening comments, AT&T encouraged the Commission to think broadly about how it could update its online filing systems – and ULS in particular – to be more efficient, functional, and user-friendly. Commenters in this proceeding have similarly echoed AT&T’s observations about the age and limitations of ULS. AT&T agrees with the Enterprise Wireless Alliance that “ULS has begun to suffer from the aging process” and that “updating it [should] be among the FCC’s highest priorities.”<sup>3</sup> The Blooston Licensees, meanwhile, note the “substantial technological changes over the past 20 years since the implementation of ULS.”<sup>4</sup> In the Commission’s recent Biennial Review and secondary markets proceedings, commenters proposed a variety of updates and reforms that would enhance ULS.<sup>5</sup>

Although the development of ULS was a significant achievement that greatly enhanced wireless licensing,<sup>6</sup> ULS had certain limitations from the start that need to be addressed if the Commission is to truly modernize its electronic filing systems. Certain filings remain impossible to make electronically,<sup>7</sup> while other classes of filings envisioned by the Commission’s rules have

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<sup>3</sup> Comments of the Enterprise Wireless Alliance, WT Docket No. 19-212, at 2 (Oct. 30, 2019) (“EWA Comments”).

<sup>4</sup> Comments of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP, WT Docket No. 19-212, at 1 (Oct. 30, 2019) (“Blooston Comments”).

<sup>5</sup> See, e.g., Comments of CTIA – The Wireless Association, WT Docket No. 19-38, at 17-22 (filed June 3, 2019) (“CTIA Comments”).

<sup>6</sup> See, e.g., EWA Comments at 1 (“The pre- and post-Universal Licensing System [] worlds are light-years apart in terms of accessibility, both for inputting data and extracting useful and accurate information from what others have filed.”).

<sup>7</sup> *Id.* at n. 16.

never been developed.<sup>8</sup> AT&T agrees with Verizon that the Commission “should update its electronic filing systems to allow for as many filings as possible to be made electronically” and that, in so doing, the Commission will “increase efficiency and decrease costs for both the Commission and applicants while also improving access to the Commission’s systems and data.”<sup>9</sup>

## **II. THE COMMISSION SHOULD PERMIT ELECTRONIC SUBMISSION OF NON-STANDARD APPLICATIONS.**

By making even a few small reforms to ULS, the Commission could greatly enhance the transparency and efficiency of ULS, benefiting both licensees and the public. In its opening comments, AT&T highlighted several proposed reforms that, if implemented, would greatly enhance ULS. However, AT&T recognizes that the Commission may not have the necessary funding to update ULS and, even if it does, such reforms cannot happen overnight. For this reason, AT&T strongly supports Verizon’s proposal that the Commission permit non-standard applications to be submitted electronically in PDF form.<sup>10</sup>

Currently, non-conforming applications, such as subleases and leasebacks, must be filed on paper in Annapolis Junction, and that office must then forward the application for processing. Because filers of paper applications do not have the benefit of ULS controls that detect certain typographical errors and invalid entries, a ministerial error in an application may not be detected

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<sup>8</sup> *The Wireless Telecommunications Bureau Announces FCC Form 608 is Available for Filing Spectrum Leasing Notifications and Applications and Private Commons Arrangements*, Public Notice, DA 06-1723, at 3 (Aug. 28, 2006)

<sup>9</sup> Comments of Verizon, WT Docket No. 19-212, at 1 (“Verizon Comments”).

<sup>10</sup> *Id.* at 3.

until it reaches Commission staff, and at that point filers often are required to start the process over again. This process is unpleasant and inefficient for applicants and Commission staff alike.

AT&T agrees with Verizon that the Commission should implement an alternative electronic process to accept these applications online. While applicants would still need to manually type entries into a PDF, such a process would enable applications to be filed immediately with electronic confirmation of receipt.<sup>11</sup> Furthermore, if the application contains a typographic error that makes inputting the application into ULS impossible, these errors could be corrected much faster and more efficiently through a PDF submission process. And, critically, neither third-party delivery services nor the Secretary's office would need to take any part in the filing process.<sup>12</sup>

In its comments, Verizon suggests that the Commission either create a webform for receipt of such non-conforming applications or create an email address where PDF versions of these applications could be sent.<sup>13</sup> AT&T enthusiastically supports either proposed solution. However, AT&T notes that the Commission has a third option that would allow for the submission of non-conforming applications in PDF form while not requiring the Commission to change anything. Specifically, the Commission could confirm that non-standard applications may be uploaded via the existing "Submit a Pleading" link on ULS. Because this electronic filing process already requires filers to associate their submission with call signs and/or file numbers in ULS, it can be leveraged to much more efficiently enable applicants to submit non-

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<sup>11</sup> Verizon Comments at 3.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

standard applications to the Commission and automatically route them to the appropriate entries in ULS and/or Commission personnel.<sup>14</sup>

### **III. CONCLUSION**

AT&T supports the Commission's efforts to enhance the process of electronic licensing and encourages the Commission to think broadly and comprehensively update ULS. In the interim, the Commission can greatly enhance the online filing and licensing process by permitting electronic transmission of non-conforming licensing applications.

Respectfully Submitted,

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<sup>14</sup> AT&T cannot think of any application purpose other than an application for a new license that would not be associated with either an existing call sign or file number. Although this filing approach would not work for the (presumably) rare case of an application for a new license being filed on paper, it should work well for all other filings.