Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Assessment and Collection of Regulatory Fees for Fiscal Year 2014	)	MD Docket No. 14-92
	)	
	)	
Assessment and Collection of Regulatory Fees for Fiscal Year 2013	)	MD Docket No. 13-140
	)	
	)	
Procedures for Assessment and Collection of Regulatory Fees	)	MD Docket No. 12-201

COMMENTS OF CTIA – THE WIRELESS ASSOCIATION®

CTIA – THE WIRELESS ASSOCIATION®

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CTIA – The Wireless Association® ("CTIA") submits these Comments in response to Commission's Notice of Proposed Rulemaking and Second Further Notice of Proposed Rulemaking (collectively, "*Notice*") seeking input on the collection of regulatory fees in Fiscal Year ("FY") 2014 and on proposals to reform the Commission's policies for assessing and collecting regulatory fees more generally.[1]

I. INTRODUCTION AND SUMMARY

CTIA continues to support Commission efforts to reform the regulatory fee framework so that regulatory fees better reflect the work conducted by Commission staff. The *Notice* unfortunately sets forth several proposals that are inconsistent with the mandates of Section 9 of the Communications Act of 1934, as amended (the "Act") and otherwise lack a rational basis or supporting data regarding how they affect regulatees. Once again it appears that wireless regulatees are targeted for a disproportionate share of regulatory fees, and these comments

[1] *Assessment and Collection of Regulatory Fees for Fiscal Year 2014*, Notice of Proposed Rulemaking, Second Further Notice of Proposed Rulemaking, and Order FCC 14-88, MD Docket Nos. 14-92, 13-140, and 12-201 (rel. June 13, 2013) ("*Notice*").

identify why such proposals are unlawful and in conflict with the purpose of Section 9. CTIA urges the Commission to take the following actions:

- Reject the proposal to incorporate wireless regulatees into the Interstate Telecommunications Service Provider ("ITSP") regulatory fee category, which would fail to meet statutory requirements and raises significant concerns;

- Decline to adopt proposals to reallocate indirect Full Time Equivalent ("FTE") employees away from the International Bureau ("IB") and to a lesser extent the Wireline Competition Bureau ("WCB") – core bureaus under Section 9 of the Act;

- Supply more information to assess the consequences of the proposal to adjust the *de minimis* threshold and reject the proposal to eliminate certain fee categories from paying regulatory fees; and

- Encourage Congress to allow the Commission to apply excess regulatory fees from previous years to the next funding year.

The Commission also should acknowledge that wireless regulatees contribute more to the Commission's overall budget than any other segment of the communications industry.

II. CTIA SUPPORTS COMMISSION EFFORTS TO UPDATE THE REGULATORY FEE PROCESS AND MAKE IT MORE TRANSPARENT, CONSISTENT WITH SECTION 9 OF THE COMMUNICATIONS ACT

A key factor in improving the regulatory fee mechanism is ensuring that the underlying process of how regulatory fees are established, calculated and collected comports with current FTE allocations among bureaus and offices and is transparent to the public and regulatees. The Commission made significant strides last year when it updated its FTE allocation data after 15 years, and CTIA supports revising the FTE allocation at regular intervals to avoid regulatees paying fees based on outdated information of bureau and office FTEs.[2] Such action will help ensure that the regulatory fee mechanism more accurately reflects the work conducted by Commission staff, consistent with the mandate in Section 9 of the Act.

[2] *Id.* ¶ 30.

CTIA also supports the Commission's efforts to make it easier for interested parties to obtain information about regulatory fees, such as enhancing the Commission's website and making regulatory fee waiver decisions public as suggested in the *Notice*.[3]

But further steps should be taken to ensure that the regulatory fee methodology – and any reform efforts – satisfy the requirements of Section 9. This means that the Commission must ensure: (1) regulatory fees are based on the burdens imposed on the Commission, not benefits realized by regulatees[4]; and (2) any "permitted amendment" as defined by Section 9 is in response to changes in law or regulation. In addition, the Commission should strive to correct and address the assessment by the U.S. Government Accountability Office that the regulatory fee process lacks transparency.[5] For starters, parties need further information to fully consider a number of the *Notice's* reform proposals. For example, the Commission should provide: (1) substantive information about its FTE calculations; (2) the data and assumptions from which it based its proposals to reallocate indirect FTEs from bureaus and offices, to increase the *de minimis* threshold for smaller regulatees, and to exempt certain fee categories entirely from regulatory fees; and (3) the effects of its proposed adjustments on regulatees.

III. THE COMMISSION SHOULD RECOGNIZE THAT THE WIRELESS INDUSTRY CONTRIBUTES MORE TO THE COMMISSION'S BUDGET THAN ANY OTHER INDUSTRY SEGMENT

While Congress directed the Commission to base regulatory fees on the burdens regulatees impose on the Commission, the *Notice* is more focused on redistributing FTE

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[3] *Id.* ¶ 35.

[4] *Assessment and Collection of Regulatory Fees for Fiscal Year 2007*, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 15712, 15719-20 (2007) ("Section 9 is clear… that regulatory fee assessments are based on the burden imposed on the Commission, not benefits realized by regulatees.").

[5] Government Accountability Office, *Regulatory Fee Process Needs to be Updated*, GAO-12-686, at 23-25 (Aug. 2012) ("GAO Report").

allocations and regulatory fees so that wireless regulatees (and their customers) bear a larger – and disproportionate – share of the regulatory fee program. For example, with negligible discussion, the Commission proposes to shift $20 million of regulatory fees in FY 2014 from wireline to wireless regulatees (*i.e.*, more than 5 percent of FY 2014 regulatory fees) by combining the wireless and ITSP fee categories.[6] If the Commission is to consider any such proposal, it should also account for the fact that the wireless sector contributes more to the Commission's overall budget than ITSPs, or any other regulated sector for that matter.

The Commission's overall budget for FY 2014 is $449,831,000.[7] Congress directed the Commission to recover approximately $339.8 million through regulatory fees, and $98.7 million through revenues retained from spectrum auctions.[8] These auction revenues cover the following: "the personnel and administrative costs required to plan and execute spectrum auctions; operational costs to manage installment payments and collections activities; development, implementation, and maintenance of all information technology systems necessary for Auctions operations, including development of a combinatorial bidding system; and a proportional share of the general administrative costs of the Commission based on the split of direct FTE hours."[9]

As CTIA demonstrated last year, spectrum auction proceeds – paid largely by commercial mobile radio service licensees – cover more than half of WTB FTEs that would

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[6] *Notice*, ¶ 39. If regulatory fee increases are subject to a 10 percent cap, the Commission estimates that approximately $36 million in regulatory fees will be shifted over four years from wireline to wireless. *Id.* ¶38 n.70.

[7] *Federal Communications Commission, Fiscal Year 2015 Budget Estimates Submitted to Congress*, at 3 (Mar. 2014) ("FY 2015 Budget").

[8] *Notice*, ¶ 4; Consolidated Appropriations Act 2014, Pub. L. 113-76 (2014) at Division D, Title V (authorizing the Commission to collect $339,844.00 in regulatory fees and capping fees from spectrum auctions at $98,700,000).

[9] FY 2015 Budget at 35.

otherwise be covered by wireless regulatory fees.[10] Thus, unlike any other Commission regulatees, spectrum auction winners already pay the federal government for the right to serve their customers through auction payments for spectrum license rights – with those auction payments alone accounting for *more than 20 percent* of the Commission's overall budget.

To put this data into context, under the current fee mechanism, ITSPs would be responsible for approximately 29.33 percent of the Commission's budget for FY 2014.[11] By contrast, wireless regulatees would be responsible for approximately 35 percent of the Commission's budget for FY 2014.[12] Thus, Table 1 in the *Notice* that sets forth the proposed FTE percentages by core bureau for FY 2014 does not fully portray ITSP and wireless contributions to the Commission's overall administrative costs.[13] Rather, the following chart provides a more accurate accounting of each sector's contribution to the Commission's FY 2014 budget:[14]

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[10] Comments of CTIA, MD Docket Nos. 3-140, 12-201, 08-65, at 3-4 (June 19, 2013) ("CTIA 2013 Regulatory Fee Comments"). The Commission does not provide sufficient data this year to estimate the number of FTEs in WTB whose activities are covered by spectrum auction revenue, therefore CTIA relies on last year's estimates.

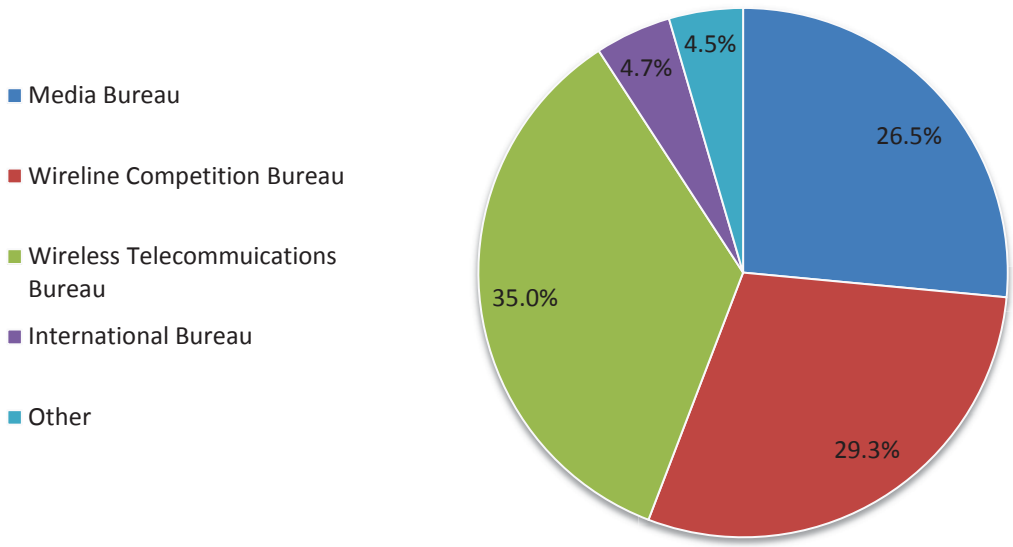
[11] The *Notice* proposes to collect $131,920,000 in ITSP regulatory fees if the Commission maintains the same FTE percentage allocations as in prior years (*see Notice* at Attachment A), which is approximately 29.33 percent of the Commission's $449,831,000 FY 2014 budget.

[12] The *Notice* proposes to collect $59,400,000 in CMRS mobile regulatory fees if the Commission maintains the same FTE percentage allocations as in prior years (*see Notice* at Attachment A). This, combined with $98.7 million of spectrum auction revenues, is approximately 35 percent of the Commission's $449,831,000 FY 2014 budget. CTIA notes that its estimate is conservative because wireless regulatees other than CMRS mobile providers (*e.g.*, CMRS messaging, BRS, and LMDS providers) also pay regulatory fees.

[13] *Notice*, ¶ 18.

[14] The chart reflects the regulatory fees the Commission proposes to collect for each core bureau in FY 2014 as set forth in Attachment A of the *Notice*, except the total WTB percentage is conservatively composed of CMRS mobile fees and spectrum auction revenues but does not include revenues from other wireless regulatees. The "Other" category includes CMRS messaging, BRS, LMDS, and those fees that the FCC collects in advance to cover the term of the license, as well as any other source of funding (*e.g.*, USF) for the FCC's annual budget.

Industry Segments' Overall Share of Contributions to FY 2014 FCC Budget



Even as the wireless sector contributes more to the Commission's overall budget than ITSPs, or any other regulated sector for that matter, some seek to impose a further burden on wireless regulatees. The *Notice* cites the Independent Telephone and Telecommunications Alliance ("ITTA") for the contention that wireline companies bear a disproportionately high burden in regulatory fees.[15] ITTA, however, fundamentally misapprehends the purpose of Section 9 regulatory fees. Indeed, as discussed below, Section 9 of the Act offers no such basis to reallocate regulatory fees. And the success of the wireless marketplace cannot justify higher regulatory fees on wireless licensees. Rather, Section 9 requires regulatory fees to "be tied to the regulatory activities of the agency, and that an industry or class of users will not pay more than their fair share of costs because of industrial growth or success."[16]

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[15] *Notice*, ¶ 36.

[16] H.R. Rep. No. 102-207, pt. 3 (1991). The provisions that became Section 9 of the Act were part of the Omnibus Budget Reconciliation Act of 1993. *See* Pub. L. No. 103-66, § 6003(a) (1993). The House Conference Report accompanying that legislation notes that the provisions regarding regulatory fees were

IV. THE PROPOSAL TO COMBINE THE WIRELESS AND ITSP REGULATORY FEE CATEGORIES CONTRADICTS THE REQUIREMENTS AND PURPOSE OF SECTION 9

CTIA and others expressed serious concerns last year when the Commission proposed to combine wireless regulatees into the ITSP regulatory fee category, identifying several significant faults in the proposal.[17] The *Notice* again seeks comment on incorporating wireless regulatees into the ITSP fee category, but the Commission does not address, much less remedy, the insufficiencies identified last year. Once again, the Commission should refrain from combining the wireless and ITSP fee categories.

A. The *Notice* Fails to Satisfy the Statutory Requirements Necessary to Combine the Two Fee Categories

The *Notice* concludes that its proposal is a "permitted amendment" as defined by Section 9(b)(3) of the Act but then fails to make the showing necessary to make the change it proposes.[18] Specifically, Section 9(b)(3) allows for amendments to the regulatory fee schedule that Congress set forth in Section 9(g) *only* in response to changes in law and regulation that, in turn, change the relationship between a particular category of regulatees and the staff-hours spent regulating them.[19] As the D.C. Circuit has noted, Section 9(b)(3) "clearly limits the Commission's authority to promulgate amendments" to the regulatory fee schedule to those "imposed in response to 'rulemaking proceeding[] or change[] in law.'"[20]

"virtually identical" to those included in a previous bill, and incorporated by reference the analysis from the House Report, quoted here. H.R. Conf. Rep. No. 103-213, pt. 4 (1993).

[17] *See, e.g.*, CTIA 2013 Regulatory Fee Comments at 6-8; Reply Comments of CTIA, MD Docket Nos. 3-140, 12-201, 08-65, at 2-3 (June 26, 2013).

[18] *Notice*, ¶ 40.

[19] 47 U.S.C. § 159(b)(3).

[20] *COMSAT Corp. v. FCC*, 114 F.3d 223, 225 (D.C. Cir. 1997).

The *Notice* identifies no rulemaking or change in law that would have caused the nature of the ITSP and wireless regulatory fee categories to warrant such fundamental changes in the regulatory fee structure for these industry segments. Thus, the Commission's proposal to combine the wireless and ITSP regulatory fee categories does not satisfy the statutory requirements set forth in Section 9 and cannot be adopted.

B. Combining ITSP and Wireless Regulatees Into One Regulatory Fee Conflicts With the Statutory Purpose of Section 9

The *Notice* also asserts that wireless services are "comparable" to wireline services, and that both services "encompass similar regulatory policies and programs."[21] In fact, the proposal ignores the very different WTB and WCB regulatory regimes and distinct burdens that wireless and wireline regulatees impose on Commission staff. For example, WCB is responsible for administering a wide range of wireline carrier regulations and policies that do not apply to wireless carriers, including various tariffing requirements, rate regulation (*e.g.*, price cap, guaranteed rate-of-return), Section 251(b) obligations, and accounting and jurisdictional separations procedures. WTB, in turn, administers highly detailed radio frequency and wireless licensing frameworks that contrast with the simple blanket domestic 214 authorization framework for wireline carriers. Consequently, the responsibilities and day-to-day work of FTEs in WTB and WCB vary to a great degree, making it nonsensical to combine them into one fee category.

Even where there may be similar programs, it is inappropriate to combine the wireless and ITSP fee categories. For example, although the *Notice* suggests that universal service is one policy that encompasses both services, WTB FTEs participate significantly in the development

[21] *Notice*, ¶ 36.

and implementation of universal service policy (for example, WTB administers the Mobility Fund, not WCB).

Moreover, the mere fact that voice service is provided over wireline and wireless facilities is not a basis to combine the services into one regulatory fee category.[22] When Congress established the regulatory fee schedule in Section 9(g), it was well aware that voice was provided over both types of facilities but chose to adopt separate wireless and wireline categories.[23] This commercial service-driven view of regulatory fees ignores the regulatory framework set forth in Section 9 and the actual work done by Commission staff. As the Commission noted just last year, the statute requires the agency to "calculate fees based on what FTEs are doing."[24] Yet here, the Commission's rationale for combining the wireless and ITSP fee categories would be premised on the view that wireless and wireline services are comparable and encompass similar policies – absent any analysis of the different bureaus' FTE work. Further, the *Notice* points out unanswered questions about how the two categories would be combined where ITSP fees are based on revenues and "wireless carriers provide 'voice' service without charge for customers with data plans."[25] The Commission should once again decline this proposal, which does not comport with the statutory requirements set out for Section 9 regulatory fees.

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[22] *Notice*, ¶ 36.

[23] 47 U.S.C. § 159(g).

[24] *Assessment and Collection of Regulatory Fees for Fiscal Year 2013*, Report and Order, 28 FCC Rcd 12351, 12357 ¶ 18 (2013).

[25] *Notice*, ¶ 37 n.69.

V. THE PROPOSALS TO REALLOCATE CERTAIN NON-CORE BUREAU FTES CANNOT BE JUSTIFIED

Last year the Commission – over significant concerns expressed by CTIA and others – redistributed the majority of IB FTEs to the other core bureaus, providing regulatory fee relief for IB regulatees at the expense of other regulatees. This year it proposes to redistribute indirect FTEs in EB, CGB and OET away from IB and WCB, once again "cherry-picking certain divisions" to provide regulatory fee relief to regulatees in certain core bureaus at the expense of others.[26] But as discussed below, these proposals do not accurately reflect the work conducted by these bureaus and offices.

First, the Commission proposes to exclude FTEs from EB's regional and field offices from two core bureaus (IB and WCB) and impose them on the two others (WTB and MB) even though the actual work conducted by FTEs in EB's regional and field offices is not limited only to WTB and MB matters. For example, the *Notice* acknowledges that EB's regional and field offices handle disaster relief efforts involving wireline carriers, and that one FTE is responsible for addressing satellite interference issues.[27] EB's website also notes that the regional and field offices have responsibility for conducting routine on-site investigations of communications facilities. Accordingly, the Commission should reject the proposal to reallocate the FTEs in EB's regional and field offices from IB and WCB and distribute them solely between WTB and MB.

Similarly, the Commission states that EB as a whole primarily focuses on enforcement activity for the wireline, wireless and media/broadcast industries, and seeks comment on splitting the rest of EB FTEs between WCB, WTB and MB, providing relief to IB regulatees. EB,

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[26] Comments of USTelecom , MD Docket Nos. 3-140, 12-201, 08-65, at 7 (June 19, 2013).

[27] *Notice*, ¶ 24.

however, at least occasionally investigates and addresses potential violations by IB regulatees, defying the *Notice's* suggestion that IB regulatees be again excluded from covering their share of regulatory costs.

The Commission's proposal to redistribute CGB FTEs from IB to WTB, WCB and MB, also has fatal flaws. First, the Commission assumes that the work conducted by one of the CGB's divisions – the Consumer Inquiries and Complaints Division ("CICD") with 55 FTEs – is an appropriate proxy for the other 101 FTEs spread throughout the CGB.[28] The CICD, which processes informal complaints, does not reflect the responsibilities and work performed by other CGB FTEs, which handle a wide range of matters that benefit regulatees of all core bureaus, including IB (*e.g.*, the Reference Information Center manages public documents relating to all bureaus). Second, the Commission cites the low number of DBS informal complaints as a basis for its conclusion that the CICD does not handle IB-related matters – but it ignores complaints that relate to other types of IB regulatees. For example, the Commission's 2014 Quarterly Consumer Inquiries and Complaints Report lists international slamming, international rates, and various satellite-related matters as "top consumer issues."[29]

Ultimately, the *Notice* fails to provide sufficient data necessary to properly assess any proposal to reallocate FTEs from one bureau or office to others. The *Notice* lacks information on how many FTEs are in the EB, CGB and OET, how many FTEs in each bureau work on matters relating to each of the core bureaus, as well as the estimated impact these proposals would have on regulatees. Based upon the limited information available, it appears that the Commission's proposals to reallocate EB FTEs would shift the number of EB FTEs allocated to the WTB from

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[28] *Id.* ¶ 24 n.50.

[29] Report of Consumer Inquiries and Informal Complaints, First Quarter, Calendar Year 2014, Top Consumer Issues – Subject Category Reference Guide, *available at* http://transition.fcc.gov/cgb/top-consumer-issues-Q1-2014.pdf.

approximately 65 FTEs to 106 FTEs – a 39 percent difference.[30] Little data is available for parties to assess the number of CGB or OET FTEs that may be affected by these proposals, nor is there sufficient data illustrating the individual and combined effects of these proposals on regulatees.[31] The Commission should decline to move forward on these incomplete proposals.

VI. OTHER PROPOSALS REQUIRE FURTHER DATA TO ASSESS OR SHOULD BE REJECTED

The Commission proposes to increase the *de minimis* threshold for excluding regulatees but fails to provide adequate information for a proper assessment.[32] For example, the Commission should identify how many companies currently qualify for the *de minimis* standard, how many new companies would qualify if a higher threshold were adopted, and – most importantly – how much regulatory fee revenue would be lost under a new threshold. The Commission should refrain from increasing the *de minimis* threshold until parties can understand the impact of the proposal, if not reject it outright.

The Commission should decline to adopt the proposal to eliminate regulatory fee categories simply because the categories individually may account for a small portion of regulatory fees.[33] Collectively, these categories are estimated to contribute more than $2.7 million in regulatory fees in FY 2014,[34] and the Commission's proposal would shift the responsibility of recovering the costs associated with regulating these entities to other regulatees.

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[30] Assuming the proposal would divide EB's regional and field office FTEs equally between WTB and MB, it appears that the number of EB FTEs allocated to WTB would jump from 65.5 FTEs (total number of EB FTEs equals 262, divided by the four core bureaus) to approximately 106 FTEs (one-half of the 114 FTEs from EB's regional and field offices plus one-third of the remaining EB FTEs).

[31] For example, Table 2 of the *Notice* attempts to illustrate the impact on reallocated CGB FTEs and the FTEs from EB's regional and field offices, but does not reflect the Commission's other reallocation proposals.

[32] *Notice*, ¶ 31.

[33] *Id.* ¶ 32.

[34] *Id.* Attachment 1.

These are legitimate regulatory fees that should be collected. In addition, it is unclear what standard the Commission used to determine the excluded categories given that there are other fee categories that appear to account for as small or smaller shares of regulatory fees than those listed in the *Notice*.[35]

VII. THE FCC SHOULD ENCOURAGE CONGRESS TO APPROPRIATE EXCESS FEES FOR FCC USE IN THE NEXT FUNDING YEAR

The Commission routinely over-collects regulatory fees each year, including $10.9 million in FY 2013, and it currently has collected a total of $81.9 million in excess fees.[36] As CTIA and others have pointed out for several years, these substantial fees simply sit in a separate account within the U.S. Department of Treasury and cannot be used without Congressional action. Accordingly, CTIA continues to urge the Commission to encourage Congress to address the disposition of those excess regulatory fees. Specifically, Congress should authorize the Commission to use excess regulatory fees in the next funding year to reduce the collection requirement, which is common practice in other similarly-situated regulatory agencies.[37]

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[35] For example, there are a fifteen fee categories (not including the categories the *Notice* already proposes to exclude) with expected FY 2014 revenues that are less than the $1.5 million that the Commission would exclude by exempting the LPTV/Class A Television and FM Translators/Boosters category from regulatory fees. *Id.*

[36] *Notice*, ¶ 18 n.35.

[37] *See, e.g.*, GAO Report at 34.

VIII. CONCLUSION

The Commission should ensure that any measures to reform the regulatory fee mechanism are consistent with comments and recommendations herein.

Respectfully submitted,

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