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August 2, 2021

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: WC Docket No. 06-122

Dear Ms. Dortch:

The Voice on the Net Coalition¹ opposes the Bureau's proposal to expand the 499 filing requirement to system integrators.² Requiring all systems integrators to file Form 499s – without any substantive explanation for the change -- would have the effect of requiring them to track regulated revenues in the U.S., create new tax software to pass through assessments, report quarterly to USAC, perform true-ups annually, and subject themselves to audit – even if they are not required to make any payments to support the USF, TRS, NANPA, or LNPA programs. System integrators that have an obligation to pay these fees already file 499s.

Expanding the obligation to entities with no such obligation casts too large a net, exceeds the jurisdiction of the FCC by capturing entities not subject to payments under the identified programs, and will create significant uncertainty in the enterprise marketplace. The FCC's contribution requirements are clear, and entities subject to those requirements are capable of assessing, applying and complying with them when applicable. There is no justification for expanding the filing obligation, as proposed by the Bureau.

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of internet communication. For more information, see www.von.org.

² See Public Notice, Wireline Competition Bureau Seeks Comment on Proposed Changes to the 2022 FCC Form 499-A, FCC Form 499-Q, and Accompanying Instructions, WC Docket No. 06-122 (issued July 1, 2021) at p. 2.

