



**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 18-3

June 25, 2018

Investigation by the Department of Telecommunications and Cable on its own Motion into Accounting Practices and Recordkeeping of Telecommunications Carriers

NOTICE OF INQUIRY

On June 25, 2018, the Department of Telecommunications and Cable ("Department") issued an Order opening a Notice of Inquiry ("NOI") into the accounting practices and recordkeeping of telecommunications carriers to ensure proper maintenance and reporting of the data necessary for the Department to fulfill its regulatory duties.

The Federal Communications Commission ("FCC") no longer relies on its Form M for collecting financial and operational data from telecommunications carriers, and has forborne from requiring the filing of similar data in its Automated Reporting Management Information System ("ARMIS"). *See, e.g., In re Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain Legacy Telecommunications Regulations*, 28 FCC Rcd. 7627, 7654-56 (2013). Further, on February 24, 2017, the FCC released an Order that modified the required accounting practices of telecommunications carriers. *In re Comprehensive Review of the Part 32 Unif. Sys. of Accounts*, 32 FCC Rcd. 1735 (2017) ("Accounting Order"). In the *Accounting Order*, the FCC amended its Part 32 Uniform System of Accounts for all telecommunications carriers, and allowed price cap carriers to elect to use generally accepted accounting principles ("GAAP") for regulatory accounting purposes, under certain conditions. *Id.* at 1739-40.

The Department seeks comment on the potential impact of these federal changes in Massachusetts, including what data are currently available for reliance in calculating rates for attachments to telecommunications carrier-owned poles; if and how the changes in the *Accounting Order* should be implemented in Massachusetts; what impact, if any, the *Accounting Order* may have on Massachusetts pole attachment rates; whether the Department should require telecommunications carriers to file data necessary to calculate pole attachment rates; what accounting systems the Department should require, if any, of telecommunications carriers; whether the Department should require telecommunications carriers to maintain continuing property records; and whether and how the Department should facilitate transparency of pole attachment rates. Further details about the scope of the inquiry can be found in the Department's Order Opening Notice of Inquiry, a copy of which is available for public viewing during normal business hours (8:45 a.m. to 5:00 p.m.) at the Department's office, 1000 Washington Street, Suite 820, Boston, MA 02118, and is posted on the Department's website at <http://www.mass.gov/dtc/>.

The Department will accept initial written comments on the issues and questions identified in the Order Opening Notice of Inquiry until 5:00 p.m. on July 25, 2018. The Department will accept reply comments until 5:00 p.m. on August 9, 2018. Comments should be filed by email attachment to dte.efiling@mass.gov, or in hardcopy to:

Shonda D. Green, Department Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

The text of each submission must specify: (1) the docket number; (2) the name of the person or company submitting the filing; and (3) a brief descriptive title of the document (e.g.,

comments or reply comments). Each submission should also include the name, title, and telephone number of a person to contact in the event of questions about the filing.

The Department may, after receiving public comments, establish additional process in this matter, if necessary. For questions about this NOI, please contact Department Secretary Shonda D. Green at Shonda.Green@mass.gov or (617) 305-3580.