

Regulatory Compliance Landscape: How to Navigate the Reporting Requirements

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Recent Federal Communication Commission (FCC) orders proposing large forfeitures against companies for failing to timely file and pay contributions to the Universal Service Fund and the Telecommunication Relay Service fund, along with numerous citations being issued for failing to file Broadband Data Collection reports highlight the need for stringent regulatory compliance processes.

There are a myriad of reporting and compliance requirements depending on the services you are providing. An important initial step is to conduct an inventory of the regulatory requirements for your company. This will include current filings, a review of updates and reminders from trade groups you may belong to, such as the Regulatory Updates provided by ACA Connects through the members' lounge and those provided by state organizations, consultants, and law firms.

Developing a compliance program ensures that all regulatory matters are captured in one place. Assigning a compliance coordinator responsible for overall compliance monitoring is essential. The compliance coordinator should ensure that the responsible departments and individuals complete the filings.

A helpful tool to easily track regulatory compliance matters can be set up using

an Excel Workbook or other similar program. The key is setting up a useful compliance document that captures and tracks, at a minimum: *Filing Type, Due Date, Reminder Dates, State/Federal Req., Service Type (Voice, Broadband, Cable), Hyperlink to Filing Site, Hyperlink to Rule, Responsible Party for Filing, Status, and Frequency*. Having the categories sortable enhances the usefulness of the document.

To increase efficiency, the compliance document should also capture the contact information for responsible individuals and the log-in credentials for each agency, such as FCC's CORES and USAC databases.

Once the tracking document is complete, the coordinator disseminates it along with written procedures to the responsible departments and individuals. The responsible individual will receive filing reminders and should confirm the filing status to the coordinator. The tracking document is updated by the coordinator and forwarded to all responsible individuals on a periodic basis (e.g., monthly).

The compliance coordinator should also be responsible for incorporating any new reporting requirements. Notifications of new reporting requirements are available through the member advisories provided by ACA Connects, other trade organizations,



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consultants, and law firms, including Cinnamon Mueller client updates. If you would like to receive Cinnamon Mueller's client update, sent via e-mail, please send your request and e-mail address to tlogan@cinnamonmueller.com.

In addition to reporting requirements, the compliance coordinator should keep abreast of new compliance mandates such as the new Broadband Label requirements. In addition to its member advisories, ACA Connects keeps its members informed on new compliance mandates through webinars, including a monthly update from Washington DC, along with the annual regulatory requirements webinar Cinnamon Mueller provides with ACA Connects every January. Past webinars are available on-demand in the ACA Connects members' lounge.

For more information on setting up a compliance program or conducting a compliance audit, contact Bruce Beard at bbeard@cinnamonmueller.com or Alma Hoxha at ahoxha@cinnamonmueller.com. ■