

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

#Solutions2020 Call to Action Plan

-)
-) Public Notice (rel. Dec. 19, 2016)
-) WC Docket Nos. 16-132, 16-106
-) WT Docket No. 16-138
-) WT Docket No. 10-112
-) WT Docket No. 15-180
-) WT Docket No. 16-421
-) WT Docket No. 10-208
-) GN Docket Nos. 14-177, 15-178
-) IB Docket Nos. 15-256, 97-95
-) EB Docket Nos. 16-120, 15-105
-) PS Docket No. 16-128
-) GG Docket No. 16-145
-) RM-11664
-)

COMMENTS OF COMPETITIVE CARRIERS ASSOCIATION

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COMMENTS OF COMPETITIVE CARRIERS ASSOCIATION

Competitive Carriers Association (“CCA”)¹ applauds Federal Communications Commission (“FCC” or “Commission”) Commissioner Mignon Clyburn’s laudable efforts to develop the *#Solutions2020 Call to Action Plan* (“Action Plan”) and appreciates the opportunity to provide feedback on this proposed agenda.² CCA generally supports the Action Plan, and provides targeted suggestions to enhance the deployment of robust, affordable and innovative mobile broadband for all Americans.³

¹ CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents approximately 200 associate members including vendors and suppliers that provide products and services throughout the mobile communications supply chain.

² *#Solutions2020 Call to Action Plan*, Public Notice (rel. Dec. 19, 2016) (“Public Notice”).

³ These comments “reference open proceedings,” and therefore, in accordance with the Public Notice and the FCC’s *ex parte* rules, CCA has submitted these comments via email and ECFS in the following proceedings: WC Docket Nos. 16-132, 16-106; WT

I. IT IS IMPERATIVE THAT THE FCC ESTABLISH POLICIES TO ADVANCE 5G AND BEYOND FOR ALL AMERICANS.

CCA applauds Commissioner Clyburn for acknowledging a variety of available opportunities to facilitate innovation, competition and development of next-generation communications services through the proposed Action Plan. Mobile broadband deployment is an economic growth catalyst that not only expands services to consumers in rural and remote parts of the United States, but also enhances commercial opportunities in areas where broadband coverage is lacking. Indeed, often overlooked benefits of increased mobile broadband deployment include job creation, access to healthcare, and precision agriculture in rural America.⁴ A pro-active approach to promoting 5G deployment and streamlining policies necessary to meet this initiative will be an economic boon that benefits consumers, wireless providers, and the economy, particularly in rural and remote areas of the United States.⁵

Docket Nos. 16-138, 10-112 15-180, 16-421, 10-208; GN Docket Nos. 14-177, 15-178; IB Docket Nos. 15-256, 97-95; EB Docket No. 16-120, ET Docket No. 15-105; PS Docket No. 16-128; CG Docket No. 16-145; RM-11664.

⁴ The White House Council of Economic Advisors has found that broadband provides numerous socio-economic benefits to “communities and individuals, improving labor market outcomes for subscribers, increasing economic growth, providing access to better healthcare, and enhancing civic participation.” *See* White House Council of Economic Advisors Issue Brief, “The Digital Divide and Economic Benefits of Broadband Access,” (Mar. 2016), *available at* https://www.whitehouse.gov/sites/default/files/page/files/20160308_broadband_cea_issue_brief.pdf. In the alternative, studies have shown that non-broadband adopters face substantial challenges engaging in job activities. In 2015, 37% of those without broadband were unable to create a resume, while 27% failed to easily access information about available jobs in their area. <http://www.pewresearch.org/fact-tank/2015/12/28/lack-of-broadband-can-be-a-key-obstacle-especially-for-job-seekers/>.

⁵ *See* Reply Comments of Competitive Carriers Association, WC Docket No. 16-143, (filed Aug. 9, 2016) (*citing* Dr. Raul Katz, *Assessment of the Impact of the Business Data Services Market Dynamics on Innovation and Competition in the U.S. Wireless Market*, July 2016); *Ex Parte* Letter from Rebecca Murphy Thompson, EVP & General Counsel, CCA, MB Docket No. 16-306 (filed Dec. 8, 2016).

To advance these goals, CCA continues to support the FCC’s efforts to unleash additional spectrum for mobile broadband. Most recently, these efforts have focused on the race to 5G deployment, with the FCC making available additional millimeter wave (“mmW”) high-band spectrum for licensed use in its *Spectrum Frontiers* proceeding.⁶ Unleashing 5G spectrum for mobile broadband use is a good first step; however, policymakers including the FCC must do more and act quickly. Moving forward, the Commission should work to promote licensed spectrum opportunities and streamlined infrastructure policies that help to expand rural, regional and nationwide broadband as cost effectively, safely and efficiently as possible.

A. The FCC Should Work with Congress to Help Pass And Implement the MOBILE NOW Act.

The Action Plan recognizes the benefits of certain legislation aimed at streamlining barriers to deployment and providing spectrum to advance 5G wireless broadband services, like The Making Opportunities For Broadband Investment and Limit Excessive and Needless Obstacles To The Wireless Act, or the MOBILE NOW Act. The MOBILE NOW Act is a bipartisan effort that targets the buildout of 5G mobile broadband and addresses multiple pain points in constructing broadband networks, from “dig once” policies, to immediate post-auction funding, to making 500 MHz of spectrum statutorily available to licensees for both fixed and mobile broadband use by 2020.⁷ The bill also seeks to ease barriers and increase certainty for

⁶ See, generally, *In the Matter of Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al.*, GN Docket No. 14-177, IB Docket No. 15-256, RM-11664, WT Docket No. 10-112, IB Docket No. 97-95, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-89 (rel. July 14, 2016) (“*Spectrum Frontiers Report and Order*”).

⁷ Making Opportunities for Broadband Investment and Limiting Excessive and Needless Obstacles to Wireless Act (Jan. 3, 2017) *available at* https://www.commerce.senate.gov/public/_cache/files/dc139eec-a303-47bf-88f8-6abe64325cb1/B30EF9FCB7D36BB155D45356D42F5F7E.mobile-now-text.pdf (the “MOBILE NOW Act”).

entities seeking to deploy wireless infrastructure, such as shot clocks for approving facilities on Federal properties. Finally, the legislation offers incentives for spectrum efficiency among Federal users to codify the Administration's goal of making 500 MHz of Federal spectrum available for private sector use by 2020.⁸

The bipartisan MOBILE NOW Act recently was reintroduced in the Senate by Commerce, Science, and Transportation Committee Chairman John Thune (R-SD) and Ranking Member Bill Nelson (D-FL). CCA applauds the Senators' diligent work to continue to pursue this legislation, which emphasizes the importance of deploying wireless broadband services in rural areas and endeavors to streamline deployment challenges, especially when working with agencies to deploy on Federal land. The FCC should continue to work alongside Congress on this and other legislative opportunities to encourage policies that provide flexibility for wireless carriers to construct networks and potentially acquire new, necessary spectrum that can be used for the deployment of next generation services.

B. Identifying Spectrum Bands Suitable For Licensed Use.

CCA has long supported the FCC's efforts to make more spectrum resources available for mobile broadband, including via unlicensed spectrum.⁹ As is reflected throughout CCA's advocacy, competitive carriers need more spectrum to effectively compete in the marketplace and provide consumers with services they demand. While unlicensed spectrum may provide some relief to spectrum-constrained mobile providers as the industry begins to explore novel

⁸ See John Eggerton, *Senate Commerce Approves Mobile Now Act*, MULTICHANNEL NEWS, Mar. 3, 2016, available at <http://www.multichannel.com/news/congress/senate-commerce-approves-mobile-now-act/403021>.

⁹ Reply Comments of CCA, GN Docket No. 14-177, IB Docket No. 15-256, RM-11664, WT Docket No. 10-112, IB Docket No. 97-95, at 9, 12 (filed Feb. 29, 2016).

pathways towards new spectrum opportunities, the FCC must be mindful of the near-term needs of mobile carriers and their consumers when allocating spectrum for mobile broadband, and especially next-generation 5G services.

For instance, the FCC's *Spectrum Frontiers Report and Order* adopted a framework that will allocate the *entire* 64-71 GHz band for unlicensed use.¹⁰ This policy would make available 14 GHz of contiguous unlicensed spectrum - almost twice the amount as licensed spectrum in the mmW bands.¹¹ Even more troubling is that, of the minimal 3.85 GHz of spectrum designated for licensed use, most is already licensed to incumbent entities. Accordingly, CCA reiterates its recommendation that the FCC reconsider its decision to allocate the entire 64-71 GHz band for unlicensed use, and instead, provide the requisite amount of licensed spectrum needed to advance 5G for the benefit of consumers throughout the country and the economy, the success on which relies so heavily on the success of mobile broadband providers.¹²

C. The FCC Must Promote Efficient and Collaborative Infrastructure Siting Policies.

The Action Plan appropriately recognizes one of the most important underlying issues that the wireless industry must overcome in the upcoming years: carriers “not only need additional spectrum, but also the ability to deploy new or improved wireless facilities or cell sites in a timely manner.”¹³ Indeed, ubiquitous deployment of affordable, next-generation services cannot be achieved without access to connected networks and facilities. CCA continues to

¹⁰ *Spectrum Frontiers Report and Order* ¶ 130.

¹¹ Of the 10.85 GHz of spectrum unleashed by the *Spectrum Frontiers Report & Order*, only 3.85 GHz of spectrum is available for licensed use.

¹² Petition for Reconsideration of CCA, GN Docket No. 14-177, IB Docket No. 15-256, RM-11664, WT Docket No. 10-112, IB Docket No. 97-95, at 7-8 (filed Dec. 14, 2016).

¹³ Public Notice at 3, 5.

support FCC efforts to reduce barriers to infrastructure deployment, including revising the *Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*,¹⁴ alongside broader efforts to ensure that small wireless antennas, associated equipment, and small cell facility deployment policies are promoted, rather than hindered. As CCA has explained, all of these aspects are conducive to foundational 5G network deployment.¹⁵

CCA applauds the FCC's recent focus on streamlining deployment of small cell infrastructure through improved wireless facilities siting policies,¹⁶ and agrees that more work needs to be done to break down infrastructure barriers. To that end, CCA supports and agrees with the six proposals listed in the Action Plan.¹⁷ Specifically, the FCC can facilitate deployment of next-generation broadband networks by exercising its authority to ensure that states and localities handle permitting and access to rights of way without violating Federal laws designed to promote the deployment of services.¹⁸ Relatedly, the FCC should continue to modernize tower siting policies to ensure carriers are able to deploy these facilities without burdensome administrative filing requirements, delays, unreasonable fees, or discriminatory

¹⁴ See Comments of CCA, WT Docket No. 15-180 (filed June 27, 2016).

¹⁵ See *id.*

¹⁶ *Comment Sought on Streamlining Deployment of Small Cell Infrastructure By Improving Wireless Facilities Siting Policies; Mobilitie, LLC Petition for Declaratory Ruling*, WT Docket No. 16-421, Public Notice, DA 16-1427 (rel. Dec. 22, 2016).

¹⁷ Public Notice at 5. CCA supports the following: ensuring that there is transparency on both sides of the table; creating capacity for permitting and making ready work; putting in place processes to streamline the permitting process; establishing stakeholder committees to understand upcoming construction and build-out opportunities; making municipal assets such as fiber, light and power poles, rooftops, street furniture and traffic signals available on a nondiscriminatory basis and attractive terms; and creating broadband-ready building stock by integrating future-looking broadband practices into the process of developing residential and commercial real estate.

¹⁸ See, e.g., 47 U.S.C. § 253.

treatment. The FCC also should look at streamlining siting policies for Federal lands, including the use of “dig once” policies, shot clocks, and support for legislation that furthers these initiatives.¹⁹ Indeed, deployment of towers, small cell facilities, and Distributed Antenna Systems have become increasingly important as broadcasters and competitive carriers prepare to clear and deploy spectrum in the 600 MHz bands, as well as carrier efforts to densify their networks to prepare for 5G. The FCC must continue to ensure all carriers have adequate resources to invest in infrastructure and network deployment – and be offered a fair and equal playing field when it comes to accessing this infrastructure.

D. Advancing Policies That Promote 5G Deployment In Rural America.

CCA and its members know the needs of rural consumers firsthand: many of CCA’s members solely serve rural and remote areas. These customers deserve, and in fact are required to have access to, comparable access to advanced broadband services as those in urban areas. CCA therefore continues to urge the FCC to provide competitive carriers adequate resources necessary to support reasonably comparable service across their coverage areas, and supports the Action Plan’s proposed initiatives to meet this goal.

First and foremost, CCA agrees that the FCC must take action on Phase II of the Mobility Fund while also allowing for an equitable phase-down period for legacy support recipients; flash cuts should be avoided to ensure that consumers in rural and remote areas continue to have

¹⁹ CCA also supports a withdrawal of the Commission’s determination that every wireless facility siting is a “Federal undertaking.” As CCA has explained, the current rules were developed – and intended – for large wireless facilities like full-sized towers. These rules are outdated, and unnecessary for the now commonly-utilized smaller wireless sites. *See* Reply Comments of CCA, PS Docket No. 16-128, WC Docket No. 16-132, WT Docket No. 16-138, at 3-4 (filed Jan. 3, 2017) (“CCA Biennial Review Reply Comments”).

existing service from competitive carriers. Universal service is critical to preserving and upgrading mobile service in rural America.

CCA also encourages the FCC to promote comparable service, by maintaining spectrum holding policies to ensure equitable access to this finite valuable resource. Likewise, the FCC must continue to promote policies to encourage equipment manufacturers and vendors to provide lower cost solutions for 5G equipment and service in rural America. This is especially important to rural and competitive carriers that lack the market power that AT&T and Verizon hold when it comes to accessing the latest and greatest in-demand devices and content.

E. Competitive Carriers Will Continue to Promote Security and Reliability In Communications Networks.

CCA recognizes that network security is a concern meriting attention from members and Federal agencies. However, the Commission should not rely on promulgating new rules in the hope that providers, especially small businesses with limited capital and personnel resources, will simply “rise to the occasion.”²⁰ Accordingly, the Action Plan should facilitate support for small providers in their efforts to participate in developing security frameworks and best practices, implement new data security protections, or join an indicator-sharing program.

CCA agrees that industry stakeholders should lead development and implementation of effective cybersecurity risk management practices and policies.²¹ Indeed, companies are in the best position to know what security threats pose the greatest risk to their customers’ most sensitive data, and are proficient in determining notification and risk management protocols to protect consumers against these threats. CCA also is supportive of voluntary indicator-sharing

²⁰ Similarly, the Commission must recognize that bolstering security is almost always a costly endeavor. Any new security-related rules or initiatives should incorporate a cost-benefit analysis, or a transparent government-led effort to estimate costs.

²¹ See Public Notice at 6.

programs like the Communications Information Sharing and Analysis Center, through which industry and government collaborate to strengthen national security and network resiliency. The FCC’s working group concluded that voluntary mechanisms “can provide macro-level assurance that communications providers are taking the appropriate measures to manage cybersecurity risks.”²² To that end, CCA supports voluntary, flexible methodologies for maintaining data security, which have proven to be more effective than prescriptive regulations.²³ Furthermore, the marketplace will play an important role in effectively disciplining broadband providers’ data security practices.

CCA also agrees that it is critical for all Americans to reach emergency personnel, regardless of whether they are using 3G, 4G LTE, or 5G services. CCA cautions the FCC to be mindful of overly burdensome reporting and notification requests, which have the potential to deter resources and attention away from the important underlying issue: security and reliability.²⁴ The FCC should focus on protecting consumers, not adding overly burdensome regulations to carriers. It also should be mindful of technology transitions away from lower generation networks that could leave rural and remote consumers stranded without access to LTE-only networks, unable to call 911 for emergency services. All of CCA members are working to upgrade their networks, but they need to do so in a safe and efficient manner, putting consumers’ safety first.

²² CSRIC, CYBERSECURITY RISK MANAGEMENT AND BEST PRACTICES WORKING GROUP 4: FINAL REPORT, 28 (March 2015) *available at* https://transition.fcc.gov/pshs/advisory/csric4/CSRIC_IV_WG4_Final_Report_031815.pdf.

²³ *See* Comments of CCA, WC Docket 16-106, at 35 (filed May 27, 2016).

²⁴ *See* CCA Biennial Review Reply Comments.

II. THE FCC SHOULD ENSURE AFFORDABLE COMMUNICATIONS BY FACILITATING DEPLOYMENT OF NEXT-GENERATION COMMUNICATIONS SERVICES.

CCA applauds the Action Plan's principal goal to narrow the gap between quality communications services in urban and rural areas. In reaching this goal, CCA first addresses the Action Plan's suggestions for "Ensuring Affordable Communications" across the United States. Specifically, CCA agrees that "to have affordable service, you must first have service."²⁵ To that end, CCA supports reforms to pole attachment rules to reduce the cost of and time for deployment. At the same, CCA urges the Commission to be wary of proposals seeking to eliminate incumbent local exchange carrier ("ILEC") pole access requirements.²⁶ Competitive carriers require access to ILEC poles to meet growing consumer demands and provide competitive alternatives. Elimination of the ILEC requirements would stunt competitive carriers' abilities to meet these goals, resulting in a detrimental impact on wireless competition.

III. THE FCC SHOULD PROMOTE TECHNOLOGIES THAT FURTHER INNOVATIONS FOR CONSUMERS WITH DISABILITIES.

CCA supports the development of reliable mobile texting solutions for individuals with disabilities, and believes that industry participants and the FCC have jointly taken important strides towards developing innovative technology to achieve such functionality. CCA applauds the FCC's efforts to promote a seamless transition from text telephone technology to real-time text ("RTT").²⁷ As CCA has explained in the RTT proceeding, a clearly articulated and

²⁵ Public Notice at 3.

²⁶ *See, e.g.*, Comments of CenturyLink, WC Docket No. 16-132, EB Docket No. 16-120, WT Docket No. 16-138, at 12 (filed Dec. 5, 2016).

²⁷ *See Transition from TTY to Real-Time Text Technology et al.*, CG Docket No. 16-145, GN Docket No. 15-178, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-169 (rel. Dec. 16, 2016) ("*TTY-to-RTT Order*").

appropriately phased framework for RTT implementation will result in positive outcomes for all stakeholders.²⁸ In the recently released *Report and Order*, the FCC achieves these goals and adopts an implementation framework that affords industry participants the flexibility and time needed to deploy RTT. CCA looks forward to continued work with industry stakeholders and participants to develop industry standards, such as appropriate latency and error rate parameters and device functionality.²⁹

IV. BROADBAND SHOULD BE USED AS A DRIVER OF IMPROVED HEALTH SERVICES.

As noted herein, CCA's membership consists of many rural and regional carriers that serve customers in remote locations, and therefore recognize the critical role that remote patient monitoring can play for these consumers. As acknowledged by the Action Plan, CCA member C Spire's pilot program seeks "to improve healthcare in rural Mississippi for underserved individuals struggling with chronic diabetes through remote monitoring and data analytics."³⁰ This program relies on high-speed mobile broadband communications with easy-to-use handheld devices that link a medical center to patients at home to deliver connected, collaborative and cost-effective care. The Action Plan aptly recognizes that results of the program revealed that "none of those patients had hospital visits, resulting in a \$339,000 savings in Medicare spending."³¹

²⁸ See, e.g., Letter from John Nakahata, Counsel to CCA and T-Mobile, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 16-145, GN Docket No. 15-178 (Dec. 7, 2016).

²⁹ See *TTY-to-RTT Order*, ¶¶ 57, 62 (recommending that industry and consumer stakeholders work together to determine appropriate parameters and technical features).

³⁰ Press Release, C Spire, Groundbreaking Diabetes Telehealth Initiative Wins Major Industry Award From TMC (Jan. 14, 2016), available at https://www.cspire.com/company_info/about/news_detail.jsp?entryId=25000005.

³¹ Public Notice at 9 (emphasis added).

Another CCA member, General Communication, Inc. (“GCI”), also has implemented a successful telehealth program: ConnectMD.³² Through this program, GCI supports the delivery of telemedicine services such as remote patient monitoring to customers in Alaska. These services improve healthcare in areas that traditionally have few physicians and even fewer medical specialists in a variety of medical fields. In most instances, the ConnectMD network is the only way that rural Alaskans may gain access to specialists, and has allowed these communities to offer readily-available, cost-effective health services to their residents, eliminating any need for residents to take long and expensive trips for medical attention. Importantly, ConnectMD also accommodates patients with sudden symptoms, often developing treatment plans without the need for costly hospitalization. Accordingly, CCA encourages the FCC to take action to promote and encourage additional telehealth projects in the near-term.

Similarly, CCA supports the promotion of programs like iSelectMD, which offers mobile access to medical care through an online portal that connects patients to medical professionals in their area. The program offers interactive discussions with medical professionals, along with access to treatment plans and prescription medication when appropriate.³³ Many CCA members, including Bluegrass Cellular, Carolina West Wireless, Chat Mobility, and MTPCS, LLC engage in broadband health programs like iSelectMD, to ensure consumers in their network footprints continue to have access to the best service and programs available.

³² See GCI ConnectMD, <http://www.connectmd.com/> (last visited Jan. 10, 2016).

³³ See iSelectMD, Revolutionizing and Reimagining Healthcare, *available at* <http://www.iselectmd.com/iselectmd-mobile/> (last visited Jan. 9, 2017).

V. CONCLUSION.

CCA appreciates the opportunity to comment on Commissioner Clyburn's Action Plan and respectfully asks that the foregoing be taken into consideration for the final report. CCA looks forward to continued work with the Commission to promote robust, affordable broadband connectivity to all areas of the United States.

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