

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reducing Barriers to Network Improvements and Service Changes	)	WC Docket No. 25-209
	)	
Accelerating Network Modernization	)	WC Docket No. 25-208
	)	

**COMMENTS OF WTA – ADVOCATES FOR RURAL BROADBAND**

WTA-Advocates for Rural Broadband (“WTA”) submits these comments in support of the Commission’s proposal to remove unnecessary burdens that inhibit network improvements and service changes.<sup>1</sup> WTA is a national trade association representing approximately 400 small, rural local telecommunications carriers. The typical WTA member company serves fewer than 5,000 customers per service area and has fewer than 50 employees. WTA’s members provide voice, broadband and other communications-related services to some of the most remote, rugged, sparsely populated, and expensive-to-serve areas of the United States, and have been at the forefront of providing advanced services to these very difficult to serve territories. Despite these difficulties, WTA’s members have deployed and continue to deploy modern fiber networks to their customers.

WTA appreciates the efforts the Commission has made and continues to make to eliminate or reduce broadband deployment obstacles, such as the streamlining and forbearance

---

<sup>1</sup> *Reducing Barriers to Network Improvements and Service Changes* FCC 25-37, released July 25, 2025, 90 Fed. Reg. 41940 (Aug. 28, 2025) (hereafter cited as “NPRM”).

proposals in this proceeding. As Congress recognized in 1934 in Section 1 of the Communications Act, and reinforced in Section 706 of the 1996 Telecommunications Act, advanced services should be available to all Americans. And as the *NPRM* recognizes, money is much better spent on network upgrades like fiber deployment than on maintenance of old copper networks.<sup>2</sup> The proposed reforms will facilitate those upgrades and transitions.

The network change notification obligations under review here were placed on the incumbent local exchange carriers (“ILECs”), like our members, based on a desire to “jump start” competition at a time when the ILECs were dominant, and Unbundled Network Elements (UNEs) priced at Total Element Long Run Incremental Cost (TELRIC) was the solution. But given the significant changes over the last 30 years, those regulatory burdens are anachronisms that are unnecessary and counterproductive.

In light of the changed circumstances as well as the fact that notices of networks changes filed with the Commission have received no comments in opposition to over 400 Public Notices, WTA supports the *NPRM*’s proposal to codify the waiver so that notices of network changes would no longer be required to be filed with the Commission.<sup>3</sup> Posting the information on the service provider’s website, and providing notice directly to any interconnected local exchange providers should suffice. WTA also agrees that the Commission

---

<sup>2</sup> *NPRM* at ¶ 1.

<sup>3</sup> *NPRM* at ¶¶ 10-13.

can go even further and hold that the criteria for forbearance from Section 251(c)(5)'s requirements for public notice are met.<sup>4</sup>

The *NPRM* also proposes changes to the requirements imposed on the ILECs with regard to discontinuance of services. These requirements are a vestige of a time when the ILECs were dominant and had “Carrier of Last Resort” obligations imposed upon them. But given the plethora of other technologies that can now provide voice (and data) services, it no longer makes sense to impose a slow and costly process on the ILECs to allow them to discontinue outmoded services. WTA thus supports the *NPRM* proposals, at the very least, to apply streamlined procedures to the service discontinuance process, including deeming facilities-based VoIP and facilities-based wireless services as adequate alternatives to the ILEC's TDM voice services.<sup>5</sup> Indeed, in the case of wireless services, many consumers have “voted with their wallets” and “cut the cord,” with the vast majority of people in the U.S. now living in homes having only wireless phone service.<sup>6</sup> Indeed, WTA concurs with the *NPRM* that the market has evolved so that “all discontinuance applications should be eligible for streamlined processing under current section 63.71(f)(1)” of the Commission's rules.<sup>7</sup>

---

<sup>4</sup> *NPRM* at ¶¶ 14-19. WTA is not sure to what extent there is a serious risk that a lack of mandated notification of network changes to public safety officials might adversely affect 911 service in areas where they have not yet converted to NG911. *NPRM* at ¶ 20. But because WTA's members appreciate the importance of 911 service and are regularly in contact with public safety officials, it would not be burdensome to require that advance notifications be provided to public safety officials that might be affected by network changes.

<sup>5</sup> *NPRM* at ¶¶ 30-31.

<sup>6</sup> According to CDC surveys, the percentages vary by age, but they range from a high of 88.9% (age 25-29) to a low of 57.9% (age 65 and over). <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202506.pdf>.

<sup>7</sup> *NPRM* at ¶ 36.

WTA also believes that it would be appropriate for the Commission to forbear from applying Section 214 discontinuance requirements in the situations identified in the *NPRM*.<sup>8</sup> The availability of alternative services from that provider or other providers means that the discontinuance requirements are not necessary to protect consumers, and the public interest would be enhanced by the elimination of these requirements. As mentioned previously, getting rid of these hurdles to the retirement of these old copper networks will free up money that can be invested in much better networks and services.

Finally, WTA agrees with the *NPRM*'s proposals to eliminate other unnecessary requirements that needlessly slow the carriers' network upgrades, including filing requirements with respect to grandfathered services<sup>9</sup> and lower-speed data communications services,<sup>10</sup> along with the requirement that the service provider notify the governor of service discontinuances.<sup>11</sup>

---

<sup>8</sup> *NPRM* at ¶ 37. WTA cautions the Commission, however, that with respect to two of the six enumerated instances – fixed terrestrial wireless broadband and low earth orbit broadband – it is not enough merely to specify that those two technologies are with “speeds of at least 25/3 Mbps and latency of no more than 100 milliseconds (ms) throughout the affected area.” *Ibid.* With fixed wireless broadband, availability and reliability can be affected by factors such as foliage. And with low earth orbit satellites, the dynamically shared spectrum/capacity (both among the LEO system's customers and between LEO systems) can affect the speeds that customers will actually experience, and may make the service “unavailable” at the requisite speeds in some areas during some times, notwithstanding the nominal “ubiquitous” coverage of LEO systems. For a more detailed discussion of the limitations of LEO satellite service, *see*, WTA Comments in the Section 706 NOI proceeding, GN Docket No. 25-223, filed September 8, 2025 at pp. 11-14, and WTA Reply Comments in the Section 706 NOI proceeding, GN Docket No. 25-223, filed September 23, 2025, at pp. 5-10. Thus, the Commission must specify that for those two technologies, the 25/3 Mbps minimum service speeds must be reliably available.

<sup>9</sup> *NPRM* at ¶¶ 69-72.

<sup>10</sup> *NPRM* at ¶ 78.

<sup>11</sup> *NPRM* at ¶ 94.

Getting rid of all of these unnecessary and anachronistic regulatory requirements will help accelerate the deployment of greatly enhanced networks and robust, new services.

Respectfully submitted,

**WTA – ADVOCATES FOR RURAL BROADBAND**

/s/ Derrick B. Owens  
Derrick B. Owens  
Senior Vice President of Government  
and Industry Affairs  
400 Seventh Street, NW, Suite 406  
Washington, DC 20004  
(202) 548-0202

/s/ Stephen L. Goodman  
Stephen L. Goodman  
Regulatory Counsel  
400 Seventh Street, NW, Suite 406  
Washington, DC 20004  
(202) 607-6756

Date: September 29, 2025