Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 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

Reply Comments Of WTA – Advocates for Rural Broadband

WTA – Advocates for Rural Broadband ("WTA") hereby briefly replies to some of the other initial comments filed in proceeding seeking to accelerate network modernization by making it easier and faster for local exchange carriers to discontinue obsolete and inefficient services.[1] WTA in its comments supported the Commission's Notice of Proposed Rulemaking ("NPRM") proposals to eliminate, streamline and/or forbear from the outdated regulatory hurdles that currently delay carriers' efforts to modernize their networks. In contrast, some commenters sought to keep these regulatory anachronisms in place.

The Alarm Industry Communications Committee ("AICC") asserts the Commission must ensure continued interoperability for alarm services citing the FCC's 2016 Technology Transitions Order.[2] However, that Commission decision also specifically indicated that any such protections for alarm services interoperability were not permanent: "At the same time, we

---

[1] These Reply Comments are timely in light of the government shutdown and the procedures adopted by the Commission as a result. https://docs.fcc.gov/public/attachments/DA-25-937A1.pdf

[2] AICC Comments at pp. 11-13, citing *Technology Transitions*, 31 FCC Rcd 8283 (2016).

make clear that carriers are not required to provide access to these capabilities in perpetuity."[3] Indeed, as the Commission further explained in that decision:

> We adopt AT&T's proposal that widely adopted low-speed modem devices—in particular, fax machines, ***home security alarms***, medical monitoring devices, analog-only caption telephone sets, and point-of-sale terminals—should make up the initial list of key applications for which applicants seeking automatic grant must demonstrate that any replacement service offers interoperability. ***We conclude that it is appropriate to expect that replacement services offer compatibility with these devices until 2025, to provide time for the marketplace to migrate to new services and applications that will provide similar functions***.[4] (emphasis added, citation omitted)

The alarm industry have been on notice of the need to transition for almost a decade, so further delays are not warranted.

In urging the Commission not to make the proposed changes, AICC claims that the alternatives to landline connections are inadequate for alarm monitoring use.[5] But the marketplace suggests otherwise -- the majority of alarm systems are now connected via cellular/wireless or Internet service.[6] To bolster its claim to need special protections from this Commission effort to accelerate technology transitions, AICC also contends that: "National crime statistics confirm that burglary rates have declined sharply in recent decades and criminologists and industry analysts point to the rising prevalence of monitored alarms as a key

---

[3] *Ibid* at ¶ 157.

[4] *Ibid* at ¶ 159.

[5] AICC Comments at p. 16 ("While these alternative services may be adequate for general consumer use, they may not provide the specific functionality required for alarm applications").

[6] https://www.security.org/home-security-systems/no-landline/. *See also,* AICC Comments at p. 4 ("While all responding companies now use cellular/wireless communication paths, most still maintain traditional copper POTS lines and cable modem/VoIP services, with nearly all utilizing Internet based IP services.").

contributor."[7] While that certainly may be true, as WTA noted above, most of the alarm monitoring is conducted via wireless or Internet connections, so Commission action here to hasten the technology transition will not lead to a spike in burglaries. Finally, AICC cites to a couple of widespread network outages to support its claim for retaining the notice obligations.[8] AICC recognizes these are very different scenarios[9] – but then asserts: "Each case represents a scenario comparable to the discontinuance and technology transition situations addressed in the NPRM, where network modifications affected services that companies could not adequately prepare for without sufficient advance coordination."[10] Simply put, those unplanned network outages are not comparable situations, and do not justify the Commission rejecting the NPRM's proposal to eliminate outdated discontinuance requirements.

INCOMPAS in its comments "reiterates its position that copper retirement must not be permitted in areas where competitive providers rely on legacy loops to reach end-user customers and where no viable wholesale replacement exists."[11] WTA contends, however, that whatever merit may have existed almost three decades ago when unbundled network elements (UNEs) -- priced at Total Element Long Run Incremental Cost (TELRIC) -- were mandated by

---

7 AICC Comments at p. 7.

8 AICC Comments at pp. 5-6.

9 AICC Comments at p. 6 ("While these events did not constitute formal discontinuances or technology transitions under the Commission's rules.").

10 *Ibid.*

11 INCOMPAS Comments at p. 8.

the Commission to implement the 1996 Telecommunications Act,[12] any purported benefits of such "synthetic competition"[13] no longer makes sense in light of current market conditions.

Finally, several commenters raised issues that are best addressed in other proceedings, if at all, and in any event do not justify keeping the Commission from taking action in this proceeding to streamline the service discontinuation requirements or adopt forbearance of unnecessary requirements. A few commenters complained about some incumbent local exchange carrier ("ILEC") prices for current or alternative services.[14] But such pricing issues are beyond the scope of this proceeding. Moreover, as a general matter WTA notes that price increases in this regulated industry context are not unexpected, given the decreasing demand and high percentage of fixed costs.

Finally, while one of the goals of the proposed deregulatory efforts is to eliminate hurdles that needlessly slow the transition to new technologies like all-IP networks, a few commenters raised issues in this proceeding concerning the specifics of IP interconnection.[15] However, any such issues with regard to the specific details concerning IP transitions are best

---

[12] The merits of TELRIC pricing were criticized not long after it was adopted. *See, e.g.,* Thomas M. Jorde, J. Gregory Sidak & David J. Teece, *Innovation, Investment, and Unbundling,* 17 YALE J. ON REG. 1, 19 (2000), available at https://openyls.law.yale.edu/server/api/core/bitstreams/445e453f-bb02-472a-ad5f-2a97aa6d2c93/content (economic research has explained that forcing an ILEC to share its network with a competitor at total long-run incremental cost (TELRIC) will deter it from investing in its network).

[13] *United States Telecom Ass'n v. FCC*, 359 F.3d 554, 573 (D.C. Cir. 2004).

[14] *See*, The National Association of State 911 Administrators ("NASNA") Comments at pp. 3-4; Bandwidth, Inc. Comments at p. 6; NENA: The 9-1-1 Association Comments at p. 2; Intrado Life & Safety, Inc. ("Intrado") Comments at p. 3 & pp. 7-9.

[15] *See,* Intrado Comments at pp. 4-6; NTCA–The Rural Broadband Association Comments at pp. 9-11.

addressed in the recently-adopted NPRM directly concerning those matters,[16] rather than serving as a basis to delay prompt Commission adoption of the service discontinuance streamlining and forbearance proposed in this proceeding. Likewise, any particular legitimate concerns that commenters raised that are specific to next generation 911 transition issues[17] can be addressed in that proceeding.[18]

In sum, none of the commenters provided any valid basis for the Commission's deferral or rejection of its proposals to streamline the service discontinuance requirement as proposed in the Notice of Proposed Rulemaking.

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: November 17, 2025

---

16 *In the Matter of Advancing IP Interconnection*, FCC 25-73, released October 28, 2025.

17 *See,* NASNA Comments at pp. 2-4; Intrado Comments at pp. 10-11.

18 *Facilitating Implementation of Next Generation 911 Services (NG911),* PS Docket No. 21-479, 39 FCC Rcd 8137 (2024). *Cf.* Intl Center for Law and Economics Comments at p. 8 ("The Commission's concern about potential 911 service disruption can and should be addressed through targeted, technology-neutral requirements on any carrier that interconnects with 911 call paths, rather than by preserving a broad, inefficient, and obsolete rule that applies to all network changes.").