



Advocates for Rural Broadband

Matt Johnson
President

Kelly Worthington
Executive Vice President

February 9, 2026

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Reforming Legacy Rules for an All-IP Future; Accelerating Network Modernization,
Notice of Proposed Rulemaking, WC Docket Nos. 25-311 and 25-208

Dear Ms. Dortch:

On Thursday, February 5, 2026, Derrick Owens and Stephen Goodman of WTA – Advocates for Rural Broadband (“WTA”), along with Evelyn Jerden of LICT Corporation and Mark Gailey of Totah Communications, met via videoconference with Marcus Maher, Senior Legal Advisor to Commissioner Olivia Trusty, to discuss the Commission’s Draft Notice of Proposed Rulemaking in the above-captioned proceeding. WTA explained that while the Draft NPRM made a few fleeting references to the role of intercarrier compensation in preserving universal service, local rate affordability is an issue of critical importance to WTA’s members and their customers. Moreover, it is of critical importance to Congress, which specifically codified service at “comparable rates” in rural and urban areas in Section 254(b)(3) of the Communications Act. WTA also explained that the Commission’s goal of accelerating the deployment of all-IP networks raises a plethora of issues that are being addressed in separate proceedings (including IP interconnection, NG911, reliability, cybersecurity), but all of these issues need to be addressed in a harmonious and timely manner.

In addition, WTA urged the Commission not to eliminate intercarrier compensation in light of the critical role it plays currently for ensuring “comparable rates,” but if it is eliminated it should be phased out in a manner that recognizes the impact may be particularly severe for some carriers. WTA explained that when the Commission changed the Subscriber Plant Factor (SPF) based on relative usage to a flat 25%, it provided an eight year transition that could be extended to twelve years for carriers that were most affected by the change. *Amendment of Part 67 of the Commission's Rules & Establishment of a Joint Bd.*, 89 F.C.C.2d 1 (1982), affirmed *MCI Telecommunications Corporation v. FCC*, 750 F.2d 135 (DC Cir 1984).

Finally, WTA explained that in many states, rate increase limits or the need to go through long and expensive rate cases in order to increase rates means that local rate increases may not be a solution to a loss of intercarrier compensation revenues. Moreover, such local rate

increases also contradict the Congressional principle of rural rate affordability embodied in Section 254(b)(3).

Respectfully submitted,

WTA – ADVOCATES FOR RURAL BROADBAND

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cc: Marcus Maher