

February 12, 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 Monday, February 9, 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 Danielle Thumann, Senior Counsel, and Callie Coker, Legal Counsel, in the Office of Chairman Carr. WTA discussed 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 also 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, robocalling, cybersecurity and USF reform), 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, telephone access charges or CAF ICC, in light of the critical role these revenue streams play currently for ensuring “comparable rates,” but if they are eliminated, they 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).

Respectfully submitted,

**WTA – ADVOCATES FOR RURAL BROADBAND**

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