



March 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, March 5, 2026, Derrick Owens and Stephen Goodman of WTA – Advocates for Rural Broadband (“WTA”), along with WTA members Evelyn Jerden (LICT), Mark Gailey (Totah Communications), Karen Jackson-Furman and Katie Williams (WK&T), Jim Meyers (Penasco Valley Telecom), Greg Reed (Wheat State Technologies), Mike George (Pelican Broadband) and Chris Hopp (Alpine Communications), met in-person with Marcus Maher, Senior Legal Advisor to Commissioner Olivia Trusty, to discuss rural broadband and telecommunications issues, including the above-captioned proceeding. WTA emphasized all of the “moving parts” that must be addressed in a holistic fashion to ensure a smooth transition to all-IP networks. These issues include: where interconnection occurs and where the network edge is defined; who bears the costs of transport; NG911 coordination; intercarrier compensation; reliability; cybersecurity (including the risks of DDoS attacks); CALEA compliance; jurisdictional assignments of IP traffic (and the possible impact on State USF funds); federal USF reforms; the need for subsidies for the short-term costs increases to implement all-IP networks; and the required transition period. The Commission listed most of these relevant proceedings in footnote 2 of the Draft Report and Order on copper retirement that will be voted on at the Commission meeting later this month. Further complicating the transition are the shortages of chips and fiber due to data center demands. Moreover, as an overarching principle, Congress directed the Commission in Section 254(b)(3) of the Communications Act to ensure that rates and services in rural areas are comparable to rates and services in urban areas.

Respectfully submitted,

WTA – ADVOCATES FOR RURAL BROADBAND

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

cc: Marcus Maher