



Advocates for Rural Broadband

Matt Johnson
President

Kelly Worthington
Executive Vice President

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), Jason Hendricks (Range), Bruce Todd (Strata Networks), James Wescott (CTC Telecom), Dan Endries (Smartoptics), Joe Krzizike (Ekinops), Dave Ryan (Strata Networks) and Chris Hopp (Alpine Communications), met in-person with Harsha Mudaliar, Policy Advisor and External Affairs Liaison to Commissioner Gomez, 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. Further complicating the transition are the shortages of chips and fiber due to data center demands. Moreover, WTA emphasized that 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

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cc: Harsha Mudaliar