



Advocates for Rural Broadband

Matt Johnson
President

Kelly Worthington
Executive Vice President

July 17, 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, WC Docket Nos. 25-311 and 25-208; Schools and Libraries Universal Support Mechanism; Federal-State Joint Board on Universal Service, CC Docket Nos. 96-45 and 97-21; Advancing IP Interconnection; Accelerating Network Modernization; Call Authentication Trust Anchor, WC Docket Nos. WC Docket Nos. 25-304, 25-208 and 17-97; Reforming the High-Cost Program for an All-IP Future; Connect America Fund: A National Broadband Plan for our Future High-Cost Universal Support, WC Docket Nos. 26-96 and 10-90

Dear Ms. Dortch:

On Wednesday, July 15, 2026, Derrick Owens and Stephen Goodman of WTA – Advocates for Rural Broadband (“WTA”), along with WTA members Rick Darsey (Pelican Broadband), Mark Gailey (Totah Communications) and Jason Hendrix (Range), met in-person with Danielle Thumann, Senior Counsel to Chairman Carr, to discuss rural broadband and telecommunications issues, including the above-captioned proceedings.

WTA addressed the comments it had filed in these various proceedings, as well as briefly touching on the High-Cost Program Reform proceeding, with comments to be filed in early August. WTA explained how all of these proceedings are interrelated, and emphasized that they should all be addressed in a holistic fashion to ensure there is a smooth transition to all-IP networks without any adverse effects on rural customers. Moreover, as an overarching principle, the Commission must be mindful that Congress directed the Commission in Section 254(b)(3) of the Communications Act to ensure that rates and services in rural areas are reasonably comparable to rates and services in urban areas. With regard to the IP Interconnection and Intercarrier Compensation proceedings, WTA first indicated that Intercarrier Compensation was not the reason for IP transition delays, as the fact that 80% of WTA’s members have initiated or completed the transition to all-IP networks demonstrates. Our members indicate that PSAPs and access tandems still requiring TDM are holding up the transition. WTA also explained that a company will incur significant costs, some of which will be ongoing, before it realizes any savings from transitioning to an all-IP network. WTA also indicated that it has suggested a three-tiered deadline for completing the transition – three years for the largest ILECs, five years for mid-sized ILECs and seven years for small ILECs. With regard to the IP Interconnection

proceeding, WTA indicated that it was one of many issues being addressed in separate proceedings affecting the transition to IP, including NG-911, Robocalling, USF Support and Telephone Access Charges.

In discussing the High Cost Support proceeding, WTA explained that support for rural service goes back to the 1934 Communications Act, and includes various measures undertaken by the Commission, including Separations and Settlements (revised under the Ozark Plan in 1970), access charges and Subscriber Line Charges to accommodate long-distance competition in the early-1980's, and then Commission action following the Telecommunications Act of 1996. While it makes sense to re-examine these different decades-old programs, what remains critical is ensuring that the Commission honors Congress' directive in Section 254(b)(3). WTA's members explained the adverse effects on its customers if the Commission eliminates or reduces the support they receive under these various programs.

Finally, WTA talked about the comments it filed in the Managing Director's Office inquiry on USAC, explaining how the USAC audit process is "Kafkaesque," with impossibly short timelines to respond to document requests, inconsistent directives from different audit teams, audits that drag on for years, and disputes over the treatment of non-material items (including the failure of one company to retain in its records the original receipt for a backhoe purchased in 1978 that, while still in service, had long-since been fully depreciated).

Respectfully submitted,

WTA – ADVOCATES FOR RURAL BROADBAND

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cc: Danielle Thumann