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October 21, 2025

VIA ECFS

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

**Re: WC Docket No. 25-304, Advancing IP Interconnection
WC Docket No. 25-208, Accelerating Network Modernization
WC Docket No. 17-97, Call Authentication Trust Anchor**

On October 17, 2025, Angela Simpson and Alexandra Mays of the Competitive Carriers Association, Chris Shipley of INCOMPAS, Michael Romano and Brian Ford of NTCA – The Rural Broadband Association, and Pam Arluk and Steve Morris of NCTA – The Internet & Television Association (collectively the Associations) met with (1) Danielle Thumann, Senior Counsel, and Callie Coker, Legal Advisor, to Chairman Carr, and (2) Melissa Kirkel and Connor Ferraro of the Wireline Competition Bureau, to discuss the draft Notice of Proposed Rulemaking on IP Interconnection to be considered at the Commission’s October agenda meeting.¹ On October 20, 2025, the same individuals met with Marcus Maher, Senior Legal Advisor to Commissioner Trusty, and on October 21, 2025, they met with Commissioner Anna Gomez and her advisors, Deena Shetler, Edyael Casaperalta, and Jocelyn Brooks.²

The Associations explained that their members have been deploying IP-based voice services for years, are fully supportive of moving to IP-based interconnection and traffic exchange arrangements, and look forward to working with the Commission to complete the IP transition. We also explained that existing *wholesale* interconnection and traffic arrangements that take place at TDM tandems, including arrangements among competitive and rural providers, are a foundational element of the current voice marketplace and generally unaffected by the level of competition for *retail* voice services. Any premature elimination of the statutory regime

¹ *Advancing IP Interconnection*, WC Docket No. 25-304, Notice of Proposed Rulemaking, FCC-CIRC2510-05 (rel. Oct. 7, 2025) (NPRM).

² Mr. Ford did not joint the meeting with Mr. Maher and Mr. Romano did not join the meeting with Commissioner Gomez and her advisors.

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underlying those network arrangements could be extremely disruptive to providers of voice services and their customers, including potential disruption of the transition to NG911.

The Associations noted that the complex factual issues raised in the item might typically be examined through a Notice of Inquiry, but even in the context of a Notice of Proposed Rulemaking we suggested some additions and revisions intended to ensure that the Commission has a sufficiently robust record to move forward in this proceeding. Specifically, we encouraged the Commission to:

- (1) reserve judgment on the causes of any delay in the IP transition and the nature of competition in the voice interconnection marketplace, and convert the NPRM's tentative conclusions on those issues into questions that will develop a more robust factual record, with particular focus on conclusory statements in paragraphs 30, 34, 37, and 39; and
- (2) add questions to the cost/benefit discussion in paragraphs 82-84 explicitly requesting input on the costs/harms to competitive and rural providers, and their customers, if section 251(c) regulation is eliminated.

Please contact the undersigned with any questions about this letter.

Respectfully submitted,

/s/ Steve Morris

Steven F. Morris

cc: D. Thumann
C. Coker
M. Kirkel
C. Ferraro
M. Maher
A. Gomez
D. Shetler
E. Casaperalta
J. Brooks