

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reducing Barriers to Network Improvements and Service Changes	)	WC Docket No. 25-209
	)	
Accelerating Network Modernization	)	WC Docket No. 25-208

**REPLY COMMENTS OF  
NTCA–THE RURAL BROADBAND ASSOCIATION**

**I. INTRODUCTION AND SUMMARY**

NTCA–The Rural Broadband Association (“NTCA”)<sup>1</sup> hereby submits these reply comments in response to the Notice of Proposed Rulemaking issued by the Federal Communications Commission (“Commission”) in the above-captioned proceedings.<sup>2</sup> In its initial comments, NTCA supported the Commission’s proposal to consolidate the Adequate Replacement Test and Alternative Options Test into a single streamlined rule while urging the Commission to ensure that any such framework includes meaningful safeguards for rural consumers.<sup>3</sup> NTCA continues to support a consolidated approach, but the record demonstrates several critical issues

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<sup>1</sup> NTCA is an industry association composed of approximately 850 community-based companies and cooperatives that provide advanced communications services in rural America and more than 400 other firms that support or themselves are engaged in the provision of such services. In the context of offering voice services, many NTCA members are incumbent local exchange carriers and rural telephone companies as defined in the Communications Act of 1934, as amended, and are referred to herein as “rural local exchange carriers” or “RLECs.”

<sup>2</sup> Reducing Barriers to Network Improvements and Services Changes; Accelerating Network Modernization, WC Docket Nos. 25-209, 25-208, Notice of Proposed Rulemaking, FCC 25-37 (rel. July 25, 2025) (“NPRM”).

<sup>3</sup> See Comments of NTCA–The Rural Broadband Association, WC Docket Nos. 25-209, 25-208 (filed Sept. 29, 2025) (“NTCA Comments”).

that require careful attention to ensure that streamlining does not come at the expense of consumer protection or public safety.

## **II. THE CONSOLIDATED TEST MUST RELY ON VERIFIED DATA, NOT UNRELIABLE MAPPING ASSUMPTIONS.**

The Commission’s proposal to classify mobile wireless service and satellite service as adequate replacements for discontinued wireline voice service raises concerns in the absence of more reliable data confirming that such services are in fact available. As a threshold matter, the Broadband Data Collection does not gather, and the NBM therefore does not depict, the availability of voice services at a granular serviceable location (*i.e.*, Fabric ID) level; rather, the Commission today collects voice *subscriptions* (not availability) at the *state or census tract* levels (and not at individual locations). Thus, at least based upon present data collections, the Commission lacks the information necessary to ascertain whether substitutable voice service even *might* in theory be available in any given area or at a given location.

Moreover, there are substantive concerns with respect to the reliability of the limited data that is gathered and published today. As NTCA has documented in other proceedings, the National Broadband Map (“NBM”) continues to contain significant discrepancies in coverage claims, particularly in rural areas.<sup>4</sup> These mapping deficiencies cannot be ignored when making decisions about service discontinuances that would leave rural consumers without access to reliable voice communications. NTCA’s initial comments therefore urged the Commission to require verification beyond mapping data before accepting mobile wireless service as an adequate

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<sup>4</sup> Ex Parte Letter from Michael R. Romano, Executive Vice President, NTCA to Marle H. Dortch, Secretary, FCC, WC Docket Nos. 19-195, 11-10, 10-90, 14-58, 09-197, 16-271, RM-11868 (filed May 2, 2024) (documenting broadband mapping issues).

replacement – drive-testing results, for example, could be used to demonstrate actual coverage throughout the affected area.<sup>5</sup> The record supports this concern – AARP notes for example that “many communities continue to experience spotty (or no) wireless coverage.”<sup>6</sup> The Rural Wireless Association has similarly documented persistent issues with the accuracy of mobile coverage data.<sup>7</sup> Given that mobile wireless service remains unreliable in many rural areas due to topography, foliage, and other factors, the Commission must require meaningful verification rather than accepting theoretical coverage claims at face value.<sup>8</sup>

A few commenters suggested that satellite service availability justifies forbearance from discontinuance applications.<sup>9</sup> Putting aside that, as far as NTCA is aware, there is no reporting of any kind presently as to whether, to what degree, and where satellite providers may offer voice services or the degree of subscription to such services, this argument misunderstands both the limitations of satellite voice service and the realities of rural communications needs. Satellite services that appear to be available in the market today face significant constraints including latency issues, weather-related disruptions, and capacity limitations that render them inadequate

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<sup>5</sup> NTCA Comments at 6-7.

<sup>6</sup> Comments of AARP, WC Docket Nos. 25-209, 25-208, at 13-14 (filed Sept. 29, 2025). As AARP goes on to note (“[w]ireless service may be available a mile down the road, but for the older adult experiencing a time-sensitive medical emergency, *that distant service is of no use*”). Emphasis added.

<sup>7</sup> Petition for Reconsideration of the Rural Wireless Association, Inc., GN Docket No. 20-32 (filed Jan. 10, 2025).

<sup>8</sup> NTCA Comments at 7.

<sup>9</sup> See Comments of USTelecom-The Broadband Association, WC Docket Nos. 25-209, 25-208, at 7-8 (filed Sept. 29, 2025) (“USTelecom Comments”).

substitutes for terrestrial voice service in many circumstances. The Commission should reject arguments for forbearance or streamlined processing based on satellite availability without verified evidence where such service is available and further confirmation that such service provides truly comparable access.

Finally, as NTCA explained in initial comments, the proposed widely adopted alternative voice service test is inherently fact-specific and unsuitable for presumptive streamlined treatment.<sup>10</sup> The record reinforces this concern, and without reliable data about actual service adoption and availability the Commission cannot make meaningful determinations about what constitutes widely adopted service in a given area. This test should be available only through waiver proceedings where carriers present verified market data for Commission review.

**III. ENSURING THAT CONSUMERS ARE PROTECTED AS TECHNOLOGY TRANSITIONS OCCUR REQUIRES ACCESS TO STANDALONE VOICE SERVICE, RELIABLE 911 SERVICE AND A CLEAR IP INTERCONNECTION FRAMEWORK THAT ENSURES ALL CALLS ARE SEAMLESSLY EXCHANGED.**

As stated in initial comments, it is essential that consumers retain access to standalone voice service and are not forced to purchase bundled broadband service simply to obtain and maintain access to voice communications.<sup>11</sup> This requirement goes to the heart of the Commission's universal service mission and its obligation to ensure that *each of* voice telephony and broadband access remains available at reasonably comparable rates in rural areas.<sup>12</sup> Arguments

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<sup>10</sup> NTCA Comments at 7-8.

<sup>11</sup> NTCA Comments at 6.

<sup>12</sup> *See* Comments of AARP, WC Docket Nos. 25-209, 25-208, at 3 (filed Sept. 29, 2025).

that market forces alone will preserve standalone voice options ignore the realities of rural markets where consumer bargaining power is limited.

The standalone voice requirement connects directly to public safety concerns raised multiple times in the record.<sup>13</sup> The Commission has made significant progress in driving investments in modernizing the nation’s 911 infrastructure and spurring the transition to Next Generation 911,<sup>14</sup> but many public safety answering points continue to rely on legacy TDM-based systems for receiving and routing emergency calls.<sup>15</sup> The Commission must require carriers to demonstrate that 911 service will remain fully functional throughout technology transitions, not simply presume that replacement services will adequately support emergency communications.

These consumer protection and public safety concerns cannot be fully addressed without resolving fundamental questions about IP interconnection.<sup>16</sup> Meaningful technology transitions require more than changes to retail service offerings, they require as well clear rules governing how carriers interconnect to exchange traffic across IP networks. The current absence of such rules creates uncertainty that deters investment and risks cost-shifting from larger carriers to smaller

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<sup>13</sup> See Comments of NENA: The 9-1-1 Association, WC Docket Nos. 25-209, 25-208, at 2 (filed Sept. 29, 2025).

<sup>14</sup> See Facilitating Implementation of Next Generation 911 Services (NG911), PS Docket No. 21-479, Report and Order, FCC 24-78 (rel. Jul. 19, 2024).

<sup>15</sup> See Comments of NASNA, WC Docket Nos. 25-209, 25-208, at 2 n.4 (filed Sept. 29, 2025) (“over 36 selective routers (copper-based TDM) [are] active and transporting 911 calls to PSAPs throughout the country”).

<sup>16</sup> Comments of Bandwidth Inc., WC Docket Nos. 25-209, 25-208, at 7-9 (filed Sept. 29, 2025) (explaining that without Commission guidance on IP interconnection, “there is a high likelihood that calls will fail and the reliability of 911 will deteriorate during the slow pace of the transition to NextGen 911”).

rural providers.<sup>17</sup> In fact, the Commission is currently considering a rulemaking on IP interconnection that proposes to forbear from the current interconnection framework, yet it remains unclear as of now what framework will emerge and how it will ensure calls (including 911) will be routed and completed on a reliable basis as the transition to IP continues.<sup>18</sup> The Commission should not authorize discontinuance of these services absent clear rules governing IP interconnection alternatives and verified availability of adequate replacements.

## **V. FORBEARANCE ARGUMENTS ARE PREMATURE AND INADEQUATELY SUPPORTED**

Some commenters have argued for forbearance from discontinuance requirements rather than adoption of a consolidated rule framework.<sup>19</sup> While NTCA does not oppose forbearance in principle, the arguments and limited facts presented in this record do not satisfy the statutory criteria under Section 10 of the Act for a sweeping grant of forbearance. As discussed above, theoretical coverage depicted on the NBM bears little resemblance to consumers' actual experience with these services, particularly in rural areas. Consumer protection, a key requirement under Section 10(a)(2), demands verification of service availability and adequacy, not assumptions based on flawed mapping data. Forbearance at this juncture, without detailed analysis of local conditions, would create regulatory uncertainty rather than the clarity the record seeks. A consolidated rule with meaningful verification requirements would provide clearer guidance to

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<sup>17</sup> Comments of INCOMPAS, WCK Docket Nos. 25-209, 25-208, at 4 (filed Sept. 29, 2025).

<sup>18</sup> See *ex parte* letter, NCTA, NTCA, INCOMPASS, CCA, WC Docket No. 25-304, et al., (fil. Oct. 21, 2025).

<sup>19</sup> See Comments of Fiber Broadband Association, WC Docket Nos. 25-209, 25-208, at 3-5 (filed Sept. 29, 2025); USTelecom Comments at 4-23 (arguing for conditional forbearance from Section 214(a) discontinuance requirements where marketplace alternatives exist and carriers provide customer notice).

carriers while ensuring that rural consumers maintain access to reliable voice services during technology transitions.

#### IV. CONCLUSION

NTCA supports the Commission's goal of streamlining discontinuance processes to facilitate technology transitions. A consolidated rule can achieve this objective while maintaining essential consumer protections but only if the Commission requires verified data rather than accepting unreliable mapping assumptions, preserves standalone voice service, and addresses 911 and interconnection issues comprehensively. The Commission should adopt a consolidated rule framework that incorporates these safeguards and reject premature arguments for forbearance.

Respectfully submitted,



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