

May 28, 2026

**VIA ECFS**

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

**Re: Promoting Consumer Choice and Wireless Competition Through Handset Unlocking Requirements and Policies, WT Docket No. 24-186**

Dear Ms. Dortch:

The undersigned companies appreciate all of the work done by Chairman Carr and the Federal Communications Commission (Commission or FCC) to benefit consumers and protect their access to affordable critical mobile phone services while taking careful action to protect consumers and companies from fraud. In support of these goals, we write to urge the Commission to adopt a clear, uniform requirement that mobile devices be automatically unlocked within 180 days after activation.<sup>1</sup> Automatic mobile device unlocking is essential to protecting consumer choice, promoting competition, and lowering costs in the mobile marketplace. Allowing a “lock period” of 180 days gives providers enough time to protect against the significant fraud concerns identified by the FCC and to ensure mobile devices are not exploited for criminal acts. We urge the FCC to prioritize the needs of consumers and their families over large corporations’ abilities to thwart competition.

**Mobile Connectivity Is Essential and Consumers Must Be Free to Switch**

Americans rely on their mobile devices in nearly every aspect of daily life, from work and education to healthcare, commerce, and public safety. While consumers today may have multiple options when purchasing mobile service, most mobile providers continue to lock devices to their networks, effectively preventing customers from switching to more affordable or consumer-friendly mobile services without

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<sup>1</sup> The record of the handset unlocking proceeding demonstrates the 60-day locking period is insufficient to combat fraud. *See, e.g.*, Comments of NCTA – The Internet & Television Association, WT Docket No. 24-186; Comments of Comcast, WT Docket No. 24-186. *See Service Rules for the 698-746, 747-762 and 777- 792 MHz Bands; Promoting Consumer Choice and Wireless Competition Through Handset Unlocking Requirements and Policies; Application of Verizon Communications Inc. and America Movil, S.A.B. de C.V. for Consent to Transfer Control of International Section 214 Authorization*, Order, DA 26-43 (WTB Jan. 12, 2026), finding that “the 60-day unlocking period that Verizon is subject to is insufficient to deter the handset fraud that it is confronting.” By contrast, a 180-day locking period will provide sufficient time for providers to detect and prevent the fraud allowed by the 60-day period. At a later time, the Commission should revisit whether a 180-day locking period continues to reflect the appropriate balance of consumer freedom and device security concerns, and if not, whether a shorter locking period should be required.

obtaining a new device.<sup>2</sup> Recent data shows that households are overspending by up to \$1,200 annually on mobile service, as compared to prices for the same services they could obtain from the increasing number of competitive options in the marketplace.<sup>3</sup>

By locking devices, providers do not merely restrict hardware – they restrict consumers. Device locking ties entire families and group plans to a single carrier, even when better-priced or better-suited options are available elsewhere. This practice weakens competition by allowing large providers to retain customers without having to earn their continued business. It is particularly harmful to those consumers who must wait for an additional time period even after they have completely paid off the device.<sup>4</sup>

### **Device Locking Harms Competition and Affordability**

Carriers offer a variety of justifications for device locking, but the practical effect is the same: customers are handcuffed to a single provider, making it financially difficult or operationally burdensome to change service providers. Two providers lock prepaid customers' handsets for 365 days, which is particularly egregious for those lower income customers who have fully paid for their device.<sup>5</sup>

This lack of mobility:

- Suppresses price competition;
- Discourages innovative service offerings;
- Disadvantages new market entrants and alternative business models; and
- Disproportionately harms price-sensitive consumers and families.

### **Automatic Unlocking Is a Balanced, Pro-Consumer Solution**

Requiring automatic device unlocking within 180 days would eliminate an anticompetitive and anti-consumer practice while still allowing providers to protect against fraud and theft, preventing bad actors from using mobile devices to facilitate broader criminal enterprises.

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<sup>2</sup> Aiden Buzzetti, *NEW POLL: 9 in 10 Voters Want Unlocked Cellphones and the Ability to Switch Providers When They Want*, Bull Moose Project (Apr. 10, 2026), <https://bullmooseproject.org/press/new-poll-9-in-10-voters-want-unlocked-cellphones-and-the-ability-to-switch-providers-when-they-want>.

<sup>3</sup> *Better for Competition, Better for Consumers: Cable Delivers for Mobile Consumers*, available at <https://spectrumfuture.com/wp-content/uploads/2025/04/Cable-Delivers-for-Mobile-Consumers.pdf>.

<sup>4</sup> “If a Verizon Gift Card is used to purchase a smartphone or pay off a remaining balance, the unlocking process will be delayed by 35 days.” <https://www.verizon.com/about/consumer-safety/device-unlocking-policy> (visited 5/18/26).

<sup>5</sup> The Prepaid Device Unlocking Policies of Verizon and T-Mobile are as follows; “Devices purchased from us will remain locked to the network until the completion of 365 days of paid and active service.” Verizon Unlocking Policy, <https://www.verizon.com/about/consumer-safety/device-unlocking-policy> (visited May 18, 2026); “At least 365 days must have passed since the device was activated on the T Mobile network. If the device was activated less than 365 days ago, then the Prepaid account associated with the device must have had more than \$100 in refills during that period for each line active on the account. In addition, more than 14 days must have passed since the device was purchased.” T-Mobile Device Unlock Policy, <https://www.t-mobile.com/responsibility/consumer-info/policies/sim-unlock-policy> (visited May 18, 2026).

Serious concerns with device fraud can be addressed by a 180-day locking period that will allow carriers to address fraud while maintaining consumer choice. We agree that a 60-day device locking period did not allow companies enough time to detect fraud. The 180-day period allows sufficient time for providers to identify and address patterns that indicate fraud. Fraud prevention methods like blacklisting, operating system updates, and other helpful tools, in combination with a 180-day locking period, provides a balanced approach that promotes both consumer choice and fraud prevention.<sup>6</sup>

We respectfully urge the Commission to act to protect consumers' right to switch providers by adopting a uniform, automatic mobile device unlocking requirement. Doing so would advance the FCC's longstanding goals of competition, consumer protection, and lowering costs in the communications marketplace.

Respectfully submitted,

ACA Connects  
NTCA – The Rural Broadband Association  
Rural Wireless Association  
SpaceX

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<sup>6</sup> As stated above, the appropriate locking period could be shortened in the future when the Commission revisits the balance of consumer freedom and device security concerns.