



September 29, 2025

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

**VIA ELECTRONIC SUBMISSION**

**Re: Notice of Proposed Rulemaking on Reducing Barriers to Network Improvements and Service Changes<sup>1</sup>**

Dear Secretary Dortch:

The U.S. Chamber of Commerce (“Chamber”) respectfully submits comments to the Federal Communications Commission (“FCC” or “Commission”) in the above referenced proceeding. For Americans to continue to reap the benefits of the digital economy and stay at the cutting edge of connectivity, communications providers must have flexibility in the technology they use. Policymakers should avoid technology mandates and embrace a technology neutral approach to determine what services are provided to consumers. The Chamber offers the following comments to facilitate communications technology modernization.

**I. Grandfathering Waivers**

The Commission should make permanent the grandfathering waivers from earlier this year that streamlined the Section 214 application process. These filing requirements no longer serve the public interest given that current customers can keep their existing service, and newer customers have better options available in the marketplace. Even worse, the filing requirements today make the process of transitioning customers to modern technologies more difficult and costly. Codifying the waivers promulgated by the Commission in March and May of this year will remove these barriers to the transition and maintain the progress in easing the transition.

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<sup>1</sup> 90 Fed. Reg. 41940 (August 28, 2025) available at <https://www.govinfo.gov/content/pkg/FR-2025-08-28/pdf/2025-16540.pdf>.

## II. Eliminating 214 Filing Requirements Through Forbearance

The Commission should further streamline the process by eliminating Section 214 filing requirements through forbearance. Remaining customers still on traditional telephony have many voice technology solutions to choose from—Voice of Internet Protocol (“VOIP”), mobile wireless, as well as fixed wireless and satellite that offer more than what legacy voice services do. Providers should not be required to get Commission approval to stop offering legacy services where there are more than adequate alternative solutions available, especially in cases where providers can move customers to another one of their own services. Eliminating these application requirements, while keeping the customer notification requirements, will save resources, increase certainty for businesses, and remove the possibility of delays caused by waiting for the public notice of application, allowing providers to shift their investments more quickly to newer technologies.

While forbearance is the best option and provides the greatest certainty, if the Commission does not forbear from 214 filing requirements it should amend its rules to simplify the existing tests for legacy voice replacement with one streamlined rule for technology transition discontinuances.<sup>2</sup>

## III. Recognizing Newer Modern Technologies as Solutions

The Commission should recognize newer, modern technologies as alternatives to replace legacy services. Recently, the Broadband Equity Access and Deployment (“BEAD”) Program rules were updated to recognize satellite more explicitly as a high-speed broadband solution, defined as minimum speeds of 100/20 Mbps and less than one hundred millisecond latency. This is also supported by state BEAD program award decisions. These benchmarks are significantly more robust than what is needed for voice communications. As these speeds are not necessary for voice calls<sup>3</sup>, the Commission should recognize that in areas where high-speed broadband is available, whether that is over fiber, cable, fixed wireless, or satellite, consumers have access to adequate replacement voice service through the use of over-the-top VoIP services and other widely available alternative voice services.

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<sup>2</sup> *Id.* at para. 26.

<sup>3</sup> [How Much Bandwidth is Needed for VoIP? | 360Connect](#)

#### IV. New Technology for Reconnection

The Commission should allow providers to leverage newer technologies to get customers connected more quickly in cases of copper theft and damage. Spending time and money on repairing outdated services does not make sense when newer options are available. Instead, incidents of copper theft and damage should be seen as opportunities to transition away from out-of-date services to more modern ones. Where these incidents occur, providers should be able to seek automatic approval for permanent discontinuance of copper through the Emergency 214 process, helping accelerate the transition.

#### V. Identify Obstacles to Progress

The FCC should identify additional obstacles to network modernization progress, including state and local rules that are not aligned. Even if FCC approval for transition is granted, providers cannot discontinue services in states that maintain Carrier of Last Resort (“COLR”) or Eligible Telecommunications Carrier (“ETC”) obligations. Since communications networks provide interstate services, one state should not hold providers back from fully realizing the effects of the transition. To ensure outdated state requirements do not hinder progress made at the federal level, the Commission should declare that federal law preempts COLR and ETC obligations for services that otherwise meet the Commission’s criteria for discontinuance.

We look forward to working with you to ensure consumers are connected with the most cutting-edge technologies. If you require more information, please contact me at [jcrenshaw@uschamber.com](mailto:jcrenshaw@uschamber.com).

Sincerely,

A handwritten signature in black ink, reading "Jordan Crenshaw". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jordan Crenshaw  
Senior Vice President  
Chamber Technology Engagement Center  
U.S. Chamber of Commerce