

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

**In the Matter of
Delete, Delete, Delete**

GN Docket 25-133

**REPLY COMMENTS OF
THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES**

I. INTRODUCTION

The National Association of State Utility Consumer Advocates (NASUCA) responds to comments submitted pursuant to the Federal Communication Commission’s (Commission or FCC) March 12, 2025, Public Notice, which requested input on “identifying FCC rules for the purpose of alleviating unnecessary regulatory burdens.”¹

NASUCA is a voluntary association of state utility consumer advocate offices that represent the interests of utility consumers in 45 states, the District of Columbia, Puerto Rico, Barbados and Jamaica across 61 different consumer advocate offices.² NASUCA member offices represent consumers who will ultimately feel the impacts of any changes to the Commission’s rules. Communication service providers deliver services that are essential for daily human interaction, economic opportunity, education, health and medical services, government efficiency, and safety. Rules are necessary to ensure that companies provide these services effectively, affordably, and fairly to all consumers. NASUCA urges the Commission to tread carefully and deliberately with any modifications to its rules so stakeholders have adequate time to fully consider and respond to proposed changes and to ensure consumers are not inadvertently harmed for the sake of expediency. The primary factor in determining whether to eliminate a regulation or Commission order should be consumer protection.

¹ See In Re: Delete, Delete, Delete, GN Docket No. 25-133, Public Notice, DA 25-219 (Mar. 12, 2025) (Delete Public Notice).

² NASUCA’s full members are designated by the laws of their respective jurisdictions to represent the interests of utility consumers before state and federal utility regulators and in the courts. NASUCA’s associate and affiliate members are recognized utility consumer advocate organizations in their respective jurisdictions.

II. COMMENTS

A. Broadband Labels

In 2022, pursuant to a Congressional directive,³ the Commission adopted the Broadband Label Order requiring broadband providers to include labels to assist consumers in understanding and comparing broadband services.⁴ As stated on the FCC website, “The adopted rules require broadband providers to display, at the point of sale, labels displaying key information consumers want – prices, speeds, fees, data allowances, and other critical information.”⁵ The resulting labels offer consumers a clear understanding of the prices and services Internet Service Providers (ISPs) have available by location.

Interest groups representing ISPs and others argue these rules are burdensome and onerous⁶ and request modifications to the rules. Some examples of proposed modifications that will reduce transparency include requests to remove government fees from the labels,⁷ to provide links to the information rather than directly displaying the information at the time of sale,⁸ or to completely remove the requirements.⁹ These modifications, however, will undermine the very transparency intended by Congress and the FCC with these labels, and any changes must be carefully considered in the existing rulemaking.¹⁰ Furthermore, given the statutory requirement that the “Commission *shall* promulgate regulations to require the display of broadband consumer labels,”¹¹ the Commission cannot consider eliminating the requirement for broadband labels entirely.

B. Legacy Voice Requirements

Copper networks remain vital to many Americans and legacy networks still fulfill essential functions even as technological changes sweep across the nation. Copper-based landline phones continue to offer unique reliability during power outages and emergencies, unlike VoIP and mobile services that rely on electricity and battery life. The term “modernization” is used in

³ 47 U.S.C. §1753.

⁴ *Empowering Broadband Consumers Through Transparency*, Report and Order and Further Notice of Proposed Rulemaking, CG Docket No. 22-2, (rel. Nov. 17, 2022) [hereinafter *2022 Report and Order*].

⁵ Broadband Consumer Labels (October 15, 2024) <https://www.fcc.gov/broadbandlabels>.

⁶ Comments of USTelecom – The Broadband Association at 8, *In re: Delete, Delete, Delete* GN Docket No. 25-133 (filed April 11, 2025).

⁷ *See id.*

⁸ *See id.* at 9.

⁹ *See* Comments of U.S. Small Business Administration at 11, *In re: Delete, Delete, Delete* GN Docket No. 25-133 (filed April 11, 2025).

¹⁰ *See* 2022 Report and Order at 43.

¹¹ 47 U.S.C. §1753.

many comments, however for many Americans, particularly the elderly and those living in rural, high-cost areas, *modern equals costly*. Service providers have not chosen to modernize their networks in all areas and to all consumers due to cost. In many areas where fiber is available, it is unaffordable for those living on a fixed income yet make slightly too much to receive Lifeline support.

Despite the reliability and affordability of legacy voice service for many households, US Telecom argues that rules should be modified to allow the company to discontinue legacy voice service without FCC approval,¹² which would mean companies could discontinue its service with no investigation or oversight of the potential impacts on consumers. Abandoning requirements for telephone providers to maintain copper landlines in the absence of a wired, comparable voice service subject to state and federal consumer protection rules would be nothing short of irresponsible and will leave vulnerable consumers without a necessary means of communication.

Legacy voice service also enables consumers to choose stand-alone long-distance service. The Telecom Act of 1996 codified the requirement for telephone companies to use Carrier Identification Codes to presubscribe consumers to the long distance carrier of their choice, a practice which arose after the AT&T Divestiture.¹³ US Telecom admits that “VoIP platforms are unable to support the Carrier Identification Code routing needed to transfer a call to an alternate provider,”¹⁴ but twists that failing of VoIP platforms into a rationale for eliminating legacy voice service. The Commission should maintain requirements for legacy service to protect consumer choice.

C. Toll-Free Number on Paper Bills

In its comments, US Telecom claims that the rule requiring paper bills to list a toll-free number for subscribers to inquire about and dispute charges is “egregiously outdated.”¹⁵ This requirement, however, increases accessibility for certain consumers and protects against potential internet scams. Many providers offer consumers who have visual impairments the option of a large-print paper bill. For these consumers, an easy to locate customer service telephone number that they can call when they have a question or concern about their charges is important.

¹² See Comments of USTelecom – The Broadband Association at 3-6.

¹³ As US Telecom summarized in their comments, the “...Commission required ILECs to maintain equal access for existing customers who were presubscribed to a stand-alone long-distance provider and grandfathered existing presubscription as of the date of the order, until the customer terminates their current stand-alone long-distance service or until further forbearance is granted based on a more well-developed record concerning existing customers.” *Id.* at 22.

¹⁴ *Id.*

¹⁵ *Id.* at 20.

Some consumers are savvy and recognize that they should go to the provider's own website to locate a toll-free customer service telephone number. However, many consumers will run an internet search for "Comcast customer service" or "Verizon phone number" and will call the first number in the search results. In many cases, that first number may not be the correct number, and in worst cases, it could be a "lookalike number" that tricks a consumer into calling a scammer. The requirement to provide an official toll-free number on paper bills prevents this type of situation from occurring and protects vulnerable consumers from whom digital literacy is an issue. The Commission should reject US Telecom's arguments and maintain its requirement to include a toll-free number for subscribers to dispute charges on paper bills.

D. 911 Reporting Requirements

Commenters request the Commission eliminate 911 outage reporting rules that went into effect on April 15, 2025.¹⁶ NASUCA urges the Commission to maintain these rules as written and only consider modifications within a rulemaking where the Commission can develop a full record on the implementation and impact of these rules.

III. CONCLUSION

NASUCA urges the Commission to tread carefully and deliberately with any modifications to its rules. The primary factor in determining whether to eliminate a regulation or Commission order should be consumer protection, and the Commission must ensure consumers are not inadvertently harmed for the sake of expediency.

Respectfully submitted,

/s/ David Springe
David Springe, Executive Director
The National Association of State Utility
Consumer Advocates (NASUCA)
8777-B Piney Orchard Pkwy
Odenton, MD 21113
(785) 550-7606 (mobile)
david.springe@nasuca.org

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¹⁶ See Comments of USTelecom at 12-13; see also Comments of U.S. Small Business Administration at 13.