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

In the Matter of	)	
	)	
Petition of AT&T for Forbearance	)	
Under 47 U.S.C. § 160(c) from	)	WC Docket No. 26-123
Requirements Imposed on Eligible	)	
Telecommunications Carriers by 47	)	
U.S.C. § 214(e)	)	

REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES, THE NATIONAL CONSUMER LAW CENTER, ON BEHALF OF ITS LOW-INCOME CLIENTS, THE COLORADO OFFICE OF THE UTILITY CONSUMER ADVOCATE, THE PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE, AND THE UTILITY REFORM NETWORK

July 22, 2026

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I. INTRODUCTION AND SUMMARY

The National Association of State Utility Consumer Advocates (NASUCA),[1] the National Consumer Law Center ("NCLC") on behalf of its low-income clients, the Colorado Office of the Utility Consumer Advocate ("CO UCA"), the Pennsylvania Office of Consumer Advocate ("PA OCA") and The Utility Reform Network ("TURN")[2] ("Consumer Advocates") respectfully submit these reply comments in the above captioned docket. NASUCA members represent the interests of individuals and households who rely on Lifeline for affordable voice

[1] NASUCA is a voluntary association of 62 consumer advocate offices. NASUCA members represent the interests of utility consumers in 45 states, the District of Columbia, Puerto Rico, Barbados and Jamaica. NASUCA is incorporated in Florida as a non-profit corporation. NASUCA's full members are designated by the laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. Members operate independently from state utility commissions. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General's office). NASUCA's associate and affiliate members also represent the interests of utility consumers but are not created by state law or do not have statewide authority. Some NASUCA member offices advocate in states whose respective state commissions do not have jurisdiction over certain telecommunications issues.

[2] TURN is a California nonprofit organization that promotes racial and economic equity advancement and accessibility through regulatory and legislative work to achieve safe, reliable, resilient, equitable and affordable communication services. At several levels of government, either directly or through coalitions, TURN advocates for policies that support the widespread deployment of reliable and high-quality communications services.

and broadband services, and the broader community of telecommunications customers who help sustain the program. NASUCA's eight Lifeline resolutions reiterate preserving and strengthening the program's core mission of making essential voice and broadband services affordable for low-income consumers.[3] NASUCA resolutions support maintaining or increasing Lifeline support levels, ensuring service quality and affordability, and requiring eligible telecommunications carriers ("ETCs") to meet strong federal and state standards while actively offering Lifeline services. The resolutions also promote consumer protections for preventing disconnection of basic voice service, allowing discounts on bundled services, improving outreach and enrollment, and protecting uniform oversight across states. NASUCA adopts and incorporates by reference the procedural history and characterization of the issues presented as set forth in TURN's comments.[4]

Consumer Advocates respectfully urge the Commission to deny AT&T's Petition because granting the requested relief would undermine the statutory and regulatory framework

[3] (1) NASUCA Resolution 2019-02, Urging The FCC To Preserve Lifeline Support For Voice Service And To Stay And Study The Scheduled Changes In Lifeline Minimum Services. Available at https://nasuca.org/wp-content/uploads/2019/07/2019-02-NASUCA-Telecom-Resolution-re-Lifeline-for-Voice-Service-Min-Standards.pdf; (2) NASUCA Resolution 2018-01, Urging The FCC And States To Assure That Lifeline Eligible Households In All Regions Of The Nation Have Access To Voice And Broadband Internet Access Services From A Choice Of Providers And Networks, Made More Affordable With Lifeline Support. Available at https://nasuca.org/wp-content/uploads/2013/11/2018-01-NASUCA-Affordable-Lifeline-Support-Resolution_-003.pdf; (3) NASUCA Resolution 2017-05, Urging State Commissions And The FCC To Adopt Policies And Processes To Provide Lifeline Eligible Households With Access To Affordable Lifeline Voice And Broadband Internet Access Services. Available at https://nasuca.org/wp-content/uploads/2017/01/2017-05-NASUCA-Lifeline-Broadband-Resolution-.pdf; (4) NASUCA Resolution 2010-02, Calling for Reform of the Lifeline Program, including Reform for Prepaid Wireless Lifeline Services. Available at https://www.nasuca.org/calling-for-reform-of-the-lifeline-program-including-reform-for-prepaid-wireless-lifeline-services-2010-02/; (5) NASUCA Resolution 2009-06, Calling For Lifeline And Link-Up Program Support For Broadband Internet Access Services And Devices. Available at https://www.nasuca.org/calling-for-reform-of-the-lifeline-program-including-reform-for-prepaid-wireless-lifeline-services-2010-02/; (6) NASUCA Resolution 2006-01, Increasing Participation in Lifeline and Link-Up Telephone Assistance Programs Through Additional and More Effective Public Outreach. Available at https://www.nasuca.org/nasuca-lifeline-resolution-2006-01/; (7) NASUCA Resolution 2005-01, Resolution to Encourage Uniform ETC Standards. Available at: https://www.nasuca.org/resolution-to-encourage-uniform-etc-standards-2005-01/; and (8) NASUCA Resolution 1996-07, Supporting a Reduction in the Residential and Single Line Business Subscriber Line Charges and Increased Federal Contribution to the Lifeline Assistance Program in Response to the Recommended Decision of the Universal Service Joint Board. Available at https://www.nasuca.org/slclifeline-assistance-1996-07/.
[4] The Utility Reform Network (TURN) et al., Comments at 1-2, WC Docket No. 26-123 (filed July 7, 2026).

governing ETCs, create uncertainty regarding the obligations associated with ETC designation, and risk adverse consequences for all Lifeline consumers who depend on reliable and affordable communications services. Consumer Advocates offer these comments because AT&T's requested relief is not limited to the circumstances presented in this proceeding; rather, it could establish a precedent that permits ETCs to relinquish critical obligations without demonstrating that consumers will continue to receive equivalent protections, service availability, and access to Lifeline benefits.

The ETC designation process serves an important consumer protection function by ensuring that carriers receiving the benefits associated with ETC status also assume corresponding responsibilities to serve eligible consumers, maintain compliance with applicable requirements, and support the goals of universal service. Allowing AT&T to withdraw from its ETC obligations based on its Petition, as filed, would improperly separate the benefits and responsibilities of ETC designation and could weaken the Commission's ability to ensure that consumers, particularly low-income and vulnerable households, have meaningful access to affordable voice and broadband services.

Consumer Advocates are concerned that granting AT&T's Petition would create a troubling precedent that invites similarly situated ETCs to seek relinquishment of their obligations, thereby undermining the integrity of the ETC framework and diminishing the Commission's ability to preserve consistent consumer protections across the Lifeline program. Such a shift could reduce accountability, complicate state and federal oversight, and create confusion for consumers regarding which providers are responsible for ensuring continuity of Lifeline service and compliance with universal service obligations. Consumer Advocates do not seek to address the merits of the parties' individual positions in this proceeding or to intervene in this matter. Rather, their interests are in ensuring that any Commission action considers the broader implications of the requested relief, including the potential effects that changes to the ETC framework could have on Lifeline consumers and universal service protections in other jurisdictions. The Commission should therefore consider not only the immediate impact of AT&T's request, but also the precedent that any decision may establish for the administration, oversight, and integrity of the Lifeline program nationwide.

For these reasons, Consumer Advocates support the arguments raised jointly by TURN, the Rural County Representatives of California ("RCRC"), and the California Alliance for Digital Equity (CADE) (TURN, et. al.,[5] and urges the Commission to deny AT&T's Petition. Preserving the existing ETC framework is essential to ensure that Lifeline remains a reliable and effective support mechanism for consumers that it was designed to serve.

II. THE LEGAL STANDARD GOVERNING ETC RELINQUISHMENT PRESERVES STATE AUTHORITY TO PROTECT CONSUMERS

Section 214 of the Communications Act establishes a cooperative federal-state framework governing the designation and relinquishment of ETC status.[6] Under Section 214(e), state commissions generally possess the authority to designate ETCs within their jurisdictions, while Section 214(e)(4) governs the relinquishment of an ETC designation.[7] Before permitting relinquishment, the statute requires the Commission to ensure that "all customers served by the relinquishing carrier will continue to be served" and that the service area is served by at least one other ETC.[8] As the Tenth Circuit explained, Section 254(f) establishes that states "cannot conflict with the federal universal service program, but states are clearly authorized to build upon

[5] Comments of The Utility Reform Network, Rural County Representatives of California, and California Alliance for Digital Equity (TURN et. al.), July 7, 2026.
[6] 47 U.S.C. § 214(e).
[7] *Id*.
[8] *Id*.

the federal program to support universal service."[9] Thus, the federal ETC requirements establish baseline protections rather than an exclusive set of criteria governing state review.

AT&T argues that Section 214(e)(4) requires only a demonstration that another ETC serves the affected area.[10] Consumer Advocates respectfully assert that AT&T's reading improperly transforms a statutory minimum into a ceiling on state authority.[11] Section 214(e)(4) does not limit the inquiry to whether the carrier has identified another ETC in the service territory.[12] Nothing in the statute prevents state commissions from considering additional evidence to ensure that consumers will continue receiving supported telecommunications services after relinquishment.[13] Had Congress intended to limit state commissions to the ministerial determination AT&T proposes, it would have clearly said so. But it did not. This is not the proper venue to contradict this statutory interpretation.

The statutory structure confirms that Congress intended states to retain substantial authority over ETC matters.[14] Section 214 assigns ETC designation authority principally to state commissions, while Section 254(f) expressly preserves the ability of states to adopt additional requirements to advance universal service so long as those requirements are not inconsistent with

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[9] *WWC Holding Co. v. Sopkin*, 488 F.3d 1262, 1275 (10th Cir. 2007).

[10] *Petition off AT&T for Forbearance Under 47 U.S.C. § 160(c) from Requirements Imposed on Eligible Telecommunications Carriers by 47 U.S.C. § 214(e),* WC Docket No. 26-123 (May 20, 2026) at 2 (AT&T Petition).

[11] "The case for federal pre-emption is particularly weak where Congress has indicated its awareness of the operation of state law... and has nonetheless decided to stand by both concepts." *Wyeth v. Levine*, 555 U.S. 555, 575 (2009).

[12] *Lifeline & Link Up Reform & Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, 4004–05 ¶ 111 (2016) ("The relinquishment process not only entails an evaluation of what service providers are present in an area at a given point in time, but of the practical ability of those providers to take on additional consumers....").

[13] *Id*.

[14] *See WWC Holding Co. v. Sopkin*, 488 F.3d 1262, 1275 (10th Cir. 2007) ("[S]tates cannot conflict with the federal universal service program, but states are clearly authorized to build upon the federal program to support universal service."); *Id*. at 1277 ("[F]ederal law does not automatically preclude the PUC from exercising [its § 214(e)] authorities...."). The Tenth Circuit, therefore, recognized that Congress did not intend the federal ETC provisions to occupy the field of universal service regulation or otherwise displace state authority absent a conflict with federal law.(*WWC Holding Co.*)

federal law.[15] Accordingly, federal law establishes a floor, not a ceiling, for state oversight of universal service obligations.[16]

As explained in TURN et. al.'s Comments, both the Fifth and Tenth Circuits have recognized that the Communications Act establishes a cooperative federal-state framework that preserves state authority over ETC matters.[17] In *Texas Office of Public Utility Counsel v. FCC*, the Fifth Circuit held that the mandatory language in Section 214(e) does not prevent states from imposing reasonable ETC requirements consistent with federal law.[18] Likewise, in *WWC Holding Co. v. Sopkin*, the Tenth Circuit explained that Section 254(f) permits states to "build upon the federal program to support universal service" and that federal law does not automatically preclude state commissions from exercising their Section 214(e) authority.[19] These decisions, therefore, confirm that Section 214(e)(4) does not preempt reasonable state procedures designed to ensure continuity of service following ETC relinquishment.

The Commission has similarly recognized that relinquishment determinations require localized, fact-specific review best conducted by state commissions.[20] The Commission has explained that "case-by-case review is better handled by the states" because they possess expertise regarding "the facts on the ground within their respective borders" and are best positioned to determine whether consumers may become unserved and whether alternative providers can serve them.[21] Accordingly, Consumer Advocates respectfully assert that Section

[15] *Id.* at 1275–77.
[16] *Id*.
[17] TURN, *Comments in Opposition to Petition of AT&T for Forbearance Under 47 U.S.C. § 160(c) from Requirements Imposed on Eligible Telecommunications Carriers by 47 U.S.C. § 214(e)*, WC Docket No. 26-123, at 2-4 (filed July 7, 2026)(TURN Comments).
[18] *Texas Office of Public Utility Counsel v. FCC,* 183 F.3d 393, 444–45 (5th Cir. 1999).
[19] *WWC Holding Co.* at 1275, 1277.
[20] Lifeline and Link Up Reform and Modernization et al., WC Dkt. No. 11-42 et al., FCC 15-166, Memorandum and Order (Dec. 28, 2015) at para. 130.
[21] *Id*.

214(e)(4) cannot reasonably be read to reduce relinquishment review to the mere identification of another ETC; such a reading would render the Commission's recognized case-by-case inquiry unnecessary.

AT&T identifies no statutory language, Commission precedent, or judicial authority demonstrating that Section 214(e)(4) preempts state commissions from requiring additional information necessary to determine whether customers will continue receiving supported services after relinquishment.[22] AT&T also mischaracterizes reasonable state review as an impermissible “exit barrier.”[23] State commissions are not imposing additional substantive eligibility requirements on relinquishing carriers; they are performing the very review Congress required to ensure that relinquishment does not leave consumers without supported service.[24] The fact that Section 214(e)(4) assigns certain responsibilities to remaining ETCs does not eliminate the state commission’s independent obligation to determine whether relinquishment can occur consistent with the statutory requirement that all customers continue to be served.[25]

Consumer Advocates respectfully assert that AT&T’s interpretation would produce an anomalous result that is inconsistent with both the text and purpose of Section 214(e)(4). Under AT&T’s reading, a state commission would be required to approve an ETC’s relinquishment whenever another ETC exists in the service area, without regard to whether customers will, in

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[22] *See Wyeth v. Levine*, 555 U.S. 555, 565 (2009) (explaining that courts presume state authority is not displaced absent a “clear and manifest purpose of Congress” and that federal preemption cannot be inferred where Congress has not clearly indicated an intent to supersede traditional state authority).
[23] *AT&T Petition* at 9.
[24] See *Lifeline & Link Up Reform & Modernization et al.*, 31 FCC Rcd. at 4004–05 ¶ 111 (explaining that relinquishment review requires consideration not only of the providers present in an area but also their “practical ability” to serve additional consumers).
[25] *See Hibbs v. Winn*, 542 U.S. 88, 101 (2004) (“A statute should be construed so that effect is given to all its provisions, so that no part will be inoperative or superfluous.”); see also *TRW Inc. v. Andrews*, 534 U.S. 19, 31 (2001) (explaining that courts are reluctant to adopt interpretations that render statutory language superfluous). AT&T's reading of Section 214(e)(4) improperly collapses the statute's distinct requirements by treating the existence of another ETC as the end of the inquiry, thereby depriving the separate requirement that “all customers served by the relinquishing carrier will continue to be served” of independent meaning. 47 U.S.C. § 214(e)(4).

practice, continue to receive reliable and affordable service.[26] As demonstrated herein, Section 214(e)(4) does not direct commissions to approve relinquishment based solely on the existence of another ETC; rather, it permits relinquishment only after the statutory conditions governing withdrawal of an ETC designation, including service by another ETC and notice to the commission and affected consumers, are satisfied.[27]

Frankly, AT&T should not be permitted to accomplish through forbearance what it would otherwise be required to demonstrate through a state relinquishment proceeding: that affected customers will continue to receive adequate service and that universal service protections will remain intact. The existence of alternative providers does not eliminate the need for a fact-specific review of whether those alternatives are sufficient to serve all affected customers, particularly low-income, rural, and high-cost consumers.

Accordingly, the Commission should reject AT&T's narrow interpretation of Section 214(e)(4) and reaffirm that state commissions retain authority to conduct the fact-intensive review necessary to ensure that ETC relinquishment will not undermine universal service or leave consumers without access to supported and reliable telecommunications services. State commissions do not serve, and were not intended by Congress to serve, as ministerial rubber stamps for ETC relinquishment decisions. Rather, Congress entrusted states with evaluating the circumstances surrounding relinquishment and determining whether universal service obligations will continue to be met.

III. AT&T'S INTERPRETATION WOULD REDUCE CONSUMER CHOICE AND INCREASE THE RISK OF SERVICE GAPS FOR LOW-INCOME AND RURAL CUSTOMERS

[26] *See AT&T Petition* at 26.
[27] 47 U.S.C. § 214(e).

Consumer Advocates respectfully submit that adopting AT&T's interpretation of Section 214(e)(4) would undermine the universal service objectives Congress established in the Telecommunications Act. Congress required universal service policies to preserve access to telecommunications services for consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high-cost areas, and required that, before an ETC relinquishes its designation, the remaining ETC or ETCs ensure that all customers served by the relinquishing carrier will continue to be served.[28]

The existence of another ETC designation, on its own, does not satisfy Section 214(e)(4). Congress instead required that, before relinquishment is permitted, the remaining ETC or ETCs "ensure that all customers served by the relinquishing carrier will continue to be served" and provided for sufficient notice to permit the purchase or construction of adequate facilities where necessary.[29] The Commission's post-2011 modernization of the universal service framework did *not* diminish the protections embodied in Section 214(e)(4).[30] To the contrary, while reforming the high-cost program to support modern broadband networks, the Commission retained Rule 54.205's requirement that state commissions ensure all customers continue to be served and allow sufficient time for remaining ETCs to construct or acquire facilities where necessary.[31] These protections are consistent with the Commission's continuing recognition that universal service policies must preserve access to telecommunications and broadband services for consumers in rural, insular, high-cost, and low-income areas.[32]

[28] 47 U.S.C. §§ 214(e)(4); 254(b)(3), (5).
[29] 47 U.S.C. § 214(e)(4); 47 C.F.R. § 54.205.
[30] *Connect America Fund et al., Report and Order and Further Notice of Proposed Rulemaking*, 26 FCC Rcd 17663 ¶¶ 18, 20, 48 (2011) (modernizing the universal service program while preserving and advancing the universal service principles codified in Section 254)(*USF/ICC Transformation Order*).
[31] 47 U.S.C. § 214(e)(4); 47 C.F.R. § 54.205(b)-(c).
[32] 47 U.S.C. § 254(b)(3); *USF/ICC Transformation Order* at ¶¶ 18–21, 63–65 (2011); Connect America Fund et al., Report and Order, 31 FCC Rcd 3087, ¶¶ 1–4 (2016).

AT&T's interpretation also cannot be reconciled with the Commission's own implementation of Section 214(e)(4). Following the USF/ICC Transformation Order and subsequent reforms to the universal service framework, the Commission retained the core requirements of Rule 54.205 that a state commission ensure affected customers will continue to be served, require adequate notice, and permit sufficient time, up to one year, where necessary, for remaining ETCs to purchase or construct facilities to serve those customers.[33] If another ETC's designation alone were sufficient to satisfy Section 214(e)(4), there would be no need for the rule to require a transition period for constructing facilities or other measures to ensure that customers continue to receive service.[34] The Commission's retention of these safeguards, therefore, is consistent with reading Section 214(e)(4)[35] to require more than a ministerial determination that another ETC exists. The reading as offered herein by Consumer Advocates also accords with Congress' universal service directive to protect consumers in rural, insular, high-cost, and low-income areas.

For these reasons, the Commission should deny AT&T's request for forbearance. AT&T's proposed interpretation would effectively circumvent the role Congress assigned to state commissions under Section 214(e)(4), reducing their statutory responsibilities to a ministerial exercise and depriving them of the ability to ensure that relinquishment will not undermine universal service or harm affected consumers.

IV. AT&T HAS FAILED TO DEMONSTRATE THAT FORBEARANCE WOULD PROTECT CONSUMERS OR SERVE THE PUBLIC INTEREST

Section 160 of the Communications Act requires the Commission to determine not only whether regulatory obligations remain necessary, but also whether forbearance will protect

[33] 47 C.F.R. § 54.205(b)-(c); *USF/ICC Transformation Order* at ¶¶ 18-21, 63-65.
[34] 47 U.S.C. § 214(e)(4); 47 C.F.R. § 54.205(c).
[35] 47 C.F.R. § 54.205(c) (allowing up to one year to purchase or construct facilities).

consumers and is consistent with the public interest.[36] Consumer Advocates respectfully assert that AT&T's Petition fails to satisfy the statutory requirements for forbearance. Instead, AT&T's Petition focuses almost entirely on the number of census blocks it claims now qualify for relief while offering little evidence that expanded forbearance would protect affected consumers or serve the public interest.[37]

The Commission's existing ETC framework includes important safeguards designed to protect consumers during service transitions and to ensure that relinquishment of ETC obligations does not occur at the expense of universal service objectives.[38] Rule 54.205 requires a relinquishing carrier to provide advance notice to the state commission and affected consumers and requires the state commission ensure that remaining ETCs will continue to serve customers.[39] The rule also recognizes that a transition may require additional time and resources by allowing remaining ETCs up to one year to purchase or construct adequate facilities where necessary to continue service.[40] These protections reflect the Commission's recognition that the existence of competitive alternatives in a service area does not, by itself, eliminate the potential risks associated with the withdrawal of an incumbent provider's ETC obligations.[41]

This consumer-focused approach is particularly important in rural and high-cost areas, where Congress has recognized that consumers may face unique challenges in obtaining reasonably comparable service and where the Commission's rules require safeguards to ensure that relinquishment does not interrupt service to affected customers.[42] By requiring advance

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[36] 47 U.S.C. § 160(a).
[37] See AT&T Petition at 16-17. NASUCA finds it notable that AT&T used the term "census block" over 80 times in its forty-three page pleading.
[38] 47 U.S.C. § 214(e)(4); 47 C.F.R. § 54.205; *USF/ICC Transformation Order* at ¶¶ 18–21, 63–65.
[39] 47 U.S.C. § 214(e)(4); 47 C.F.R. § 54.205(a)–(b).
[40] 47 C.F.R. § 54.205.
[41] 47 U.S.C. § 214(e)(4); 47 C.F.R. § 54.205(a)–(c).
[42] 47 U.S.C. §§ 254(b)(3), 214(e)(4); 47 C.F.R. § 54.205.

notice, coordination with state commissions, and assurances that affected customers will continue to be served before relinquishment becomes effective, the Commission's rules provide important consumer protections for customers who rely on ETC obligations to maintain access to supported and reliable telecommunications services.[43]

AT&T's request would remove these consumer safeguards before there has been an individualized assessment of whether affected customers will continue to have meaningful access to supported services. This concern is particularly acute in rural and high-cost areas, where geographic conditions, affordability barriers, and limited provider alternatives may make a transition more difficult. Universal service policies are intended to protect consumers in precisely these circumstances, including consumers in rural, insular, high-cost, and low-income areas.[44]

The Commission should therefore deny AT&T's request for forbearance. Granting the Petition would prioritize administrative convenience over the consumer protections embedded in the ETC framework and would risk allowing AT&T to withdraw from its obligations without sufficient assurance that affected customers will remain served with reliable communications services.

V. THE COMMISSION SHOULD REJECT AT&T'S PETITION; IF ANY RELIEF IS GRANTED, THE COMMISSION MUST PROTECT CONSUMERS AND PRESERVE STATE COMMISSION ROLES

Consumer Advocates respectfully request that the Commission deny AT&T's Petition for the reasons set forth herein. However, if the Commission determines that any relief is warranted, we urge the Commission to ensure that such relief includes robust consumer protections and

[43] *Id*.
[44] 47 U.S.C. § 254(b)(3).

preserves a meaningful role for state commissions. State commissions are uniquely positioned to evaluate local conditions, assess impacts on affected consumers, and address service concerns within their respective jurisdictions. The Commission should make clear that any grant of federal forbearance does not eliminate a state commission's authority to enforce applicable consumer protection requirements or to oversee the transition of affected customers consistent with state law. For example:

i) The Commission should expressly clarify that any grant of forbearance does not displace state commission authority to evaluate consumer impacts, oversee customer transitions, and enforce applicable state laws and regulations. State commissions should retain the ability to review local conditions and address service concerns affecting consumers within their jurisdictions.

ii) The Commission should require AT&T to provide advance notice to affected consumers and state commissions sufficient to allow consumers to understand the impact of relinquishment and make informed decisions regarding alternative service options.

iii) AT&T should be required to submit a detailed transition plan demonstrating how affected consumers, including Lifeline subscribers and consumers in rural and high-cost areas, will continue to receive supported services without interruption.

iv) The Commission should require AT&T to demonstrate that existing Lifeline subscribers will be transitioned without interruption and that eligible consumers will continue to have access to Lifeline-supported service.

v) The Commission should require periodic compliance reporting to ensure that relinquishment does not result in service gaps or unintended harm to affected consumers.

vi) AT&T should be required to maintain a dedicated consumer assistance process and promptly address complaints arising from the transition, with unresolved issues reported to the Commission and applicable state commissions.

vii) Any relief should be conditioned on maintaining existing ETC obligations until AT&T demonstrates that affected customers have a viable alternative and that the transition will not interrupt access to supported services.

Without clear safeguards and delineation of state responsibilities, AT&T's requested relief could create uncertainty regarding which regulator is responsible for protecting affected consumers and could leave vulnerable customers without an effective avenue for assistance. If the Commission grants any relief, it should do so only with conditions that maintain accountability, preserve consumer protections, and ensure that universal service obligations are not diminished before adequate replacement arrangements are in place.

VI. CONCLUSION

For the foregoing reasons, Consumer Advocates respectfully urge the Commission to deny AT&T's Petition for Forbearance. Granting AT&T's requested relief would undermine the consumer protections embedded in the ETC framework and would allow AT&T to withdraw from its universal service obligations without demonstrating that affected consumers will continue to receive reliable, affordable, and accessible service, as required by the statutory framework. The Commission should require AT&T to meet its burden under Section 160 by demonstrating that any relief is consistent with consumer protection and the public interest, particularly for low-income, rural, and high-cost consumers who may be disproportionately affected by service transitions.

In addition to, and in light of, AT&T's failure to provide sufficient evidence that existing customers, including Lifeline subscribers, will remain protected, Consumer Advocates urge the Commission to reject AT&T's attempt to rely solely on the existence of alternative providers and generalized deployment data as a substitute for meaningful consumer safeguards. The existence of another ETC or competing service provider does not, without more, establish that all affected consumers will experience a seamless transition or retain equivalent access to supported and reliable services.

Finally, should the Commission determine that any relief is warranted, Consumer Advocates urge the Commission to condition such relief on robust consumer protections, including advance notice requirements, transition planning, coordination with state commissions, and clear accountability measures to ensure continuity of service. Any action by the Commission should preserve a meaningful role for state commissions to evaluate local conditions and address consumer concerns within their jurisdictions, consistent with the universal service objectives of the Communications Act.

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