

November 24, 2026
Marlen H. Dortch, Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

RE: The Grant of Verizon's Section 214 Application Will Have Significant Detrimental Effects on Those Living in Affected Areas (WC Docket No. 26-116, WC Docket No. 26-170, WC Docket No. 26-227, WC Docket No. 26-252).

Dear Ms. Dortch:

The National Association of State Utility Consumer Advocates (NASUCA) respectfully submits this letter urging the Commission to remove Verizon's Section 214 application[1] from the streamlined application process and ultimately reject it. Verizon's applications request to cease providing service in nine states across 277,000 residential and business Plain Old Telephone Service (POTS) lines is deficient as it does not adequately outline why Verizon Wireless's service is an adequate replacement, does not show that granting of the application would be in the public interest, and would harm public safety.[2] For these reasons NASUCA asks the Commission to remove Verizon's applications as referenced above from expedited consideration and complete a full investigation into whether its services can serve as an adequate replacement for traditional POTS. NASUCA also requests that the Commission reconsider its automatic grant

[1]

[2] Section 63.71Application of Verizon, WC Docket No. 26-277, at 1-4 (filed Aug. 10, 2026), https://www.fcc.gov/ecfs/document/26110070306/1 (Verizon 214 Petition).

of the two earlier petitions (WC Docket Nos. 26-170 and 26-116) to prevent disparate treatment of POTS customers across states based solely on Verizon's choice of how to group its filings.

Verizon claims that it currently has 46,000 customers using its fixed wireless POTS voice replacement service and 115 million wireless connections and reaches 99% of the US population.[3] However, as NASUCA has pointed out before, Verizon relies primarily on the national broadband map to show that wireless services are available in any given area.[4] The National Broadband Map continues to be an unreliable source for in-home wireless network service. The Commission, itself, issues a warning that the map does not include information on the availability of mobile wireless broadband service while indoors.[5] Further, Verizon provides no evidence demonstrating the availability or coverage of its wireless network, or that true adequate alternatives exist for the very POTS users they seek to discontinue service and maintenance to. . Instead, Verizon chooses to focus on the alleged awards and accolades it has received, none of which establish the availability of wireless service in the affected areas.[6] Although these awards may speak to the general, non-premise-specific availability of Verizon's wireless services, they do not demonstrate that those services will provide performance

---

[3] *Id*. at 12-13.
[4] *See* Section 63.71 Application of Verizon, WC Docket No. 26-116, at 11 (May 15, 2026), https://www.fcc.gov/ecfs/document/10515068977832/1 ("FiveState Application"); *See also* Section 63.71 Application of Verizon, WC Docket No. 26-170, at 13 (July 7, 2026), https://www.fcc.gov/ecfs/document/26109998545/1 ("Eight State Application").
[5] *See* Federal Communications Commission, About, FCC National Broadband Map, https://broadbandmap.fcc.gov/about (last accessed Sept. 21, 2026) ("The coverage areas are meant to represent the areas where a user should be able to establish a mobile connection, either outdoors or moving in a vehicle, and achieve certain upload and download speeds. Please note that the map does not include information on the availability of mobile wireless broadband service while indoors. Moreover, because the coverage map is based on propagation modeling, a user's actual, on-the-ground experience may vary due to factors such as the end-user device used to connect to the network, cell site capacity, and terrain.")
[6] Verizon 214 Petition at 15-18; Five State Application at 11, Eight State Application at 10-12.

comparable to the POTS networks currently serving vulnerable and high cost to serve customers. . For example, the Board of Supervisors of Fauquier County noted that, in large sections of the county, mobile wireless services do not reach speeds of even 5 Mbps download and 1 upload.[7] This type of comment is not alone. Commenters from across Virginia and New Jersey shared that in their most hard to reach areas, wireless service coverage is spotty, weak, and in many cases, absent altogether.[8] Section 214(a) of the Communications Act prohibits a carrier from discontinuing, reducing, or impairing service unless the Commission determines that neither present nor future public convenience and necessity will be adversely affected.[9] Accordingly, the Commission must ensure that the proposed discontinuance will not deprive affected customers of access to adequate and reliable communications services. Where, as here, the record contains substantial evidence calling into question the availability and adequacy of Verizon's proposed replacement service, the Commission should not permit the petition to be automatically granted without further scrutiny. Instead, the Commission should undertake a meaningful review of Verizon's claims and supporting evidence to determine whether customers will have access to a reasonable substitute and whether the proposed discontinuance would adversely affect the public convenience and necessity.

---

[7] *See* Comments of the Board of Supervisors of Fauquier County at 1.

[8] *See*, Comments of Tazwell County at 2-3; Comments of the Borough of Franklin Lakes at 1-2; Comments of the New Jersey Board of Public Utilities; Comments of the Town of Warrenton, Virginia at 2-3; Comments of Loudon County, Virginia at 1-2; Comments of Fairfax County, Virginia at 1-2; Comments of the Viginia State Corporation Commission at 1-2; Comments of the Madison County Board of Supervisors at 1-2; Comments of the Dickenson County Board of Supervisors at 2-4; Comments of Virginia Senator Russet W. Perry at 1-2; Comments of the Stafford County Board of Supervisors at 1-3; Comments of the School Board of Rappahannock County, Virginia at 1-2; Comments of the Virginia Association of Counties at 2; Comments of the Virginia Municipal League; Comments of Representative Suhas Subramanyam at 1-2.

[9] 47 U.S.C. § 214(a).

Second, Verizon asserts that its mobile and fixed wireless POTS replacement services comply with all applicable regulatory requirements governing the availability and functionality of 911 services.[10] Verizon dismisses significant public safety concerns, arguing that backup power is unnecessary during shorter outages and that, during extended outages, consumers can simply rely on their vehicles or portable power banks to keep their wireless devices charged.[11] These claims willfully miss the point that outages lasting multiple days strain backup power resources as well, and such assertions do little to address the practical challenges and risks consumers may face in maintaining access to emergency services during power outages. A power bank is, at its heart, a battery that needs to be recharged, and consumers may find weather conditions too severe to sit outside in their car while devices charge. In these instances, a wireline voice connection can keep customers whose devices have failed, or who never had them in the first place, connected to the information they need to remain safe. Further, as NASUCA has highlighted in previous dockets, 911 systems continue to rely on wireline networks and critical information, such as dispatchable location, often relies on wireline services. [12] Absent evidence demonstrating that Verizon's proposed replacement services will maintain reliable access to communications, including 911, during prolonged power outages, the Commission should not grant the petitions pending before it.

Third, at the time of this writing, more than 500 comments have been filed in this docket, many from consumers expressing concern that granting Verizon's petition would deprive them of their only reliable means of communication. These concerns are not merely expressions of

[10] Verizon 214 Petition at 20; Five State Petition at 7; Eight State Petition at 7.
[11] Verizon 214 Petition at 20; Five State Petition at 13; Eight State Petition at 14.
[12] *See* Reply Comments of the National Association of State Utility Consumer Advocates, WC Docket Nos. 25-304, 25-208, 17-97, at 4-5, 7-9 (Feb. 19, 2026).

dissatisfaction; they constitute relevant evidence regarding the availability and adequacy of replacement services and the potential adverse effects of the proposed discontinuance. Section 214(a) requires the Commission to determine that the public convenience and necessity will not be adversely affected before authorizing discontinuance. The Commission cannot satisfy that obligation by disregarding substantial evidence in the record. Nor can it issue a decision that fails to meaningfully address significant consumer concerns without risking arbitrary and capricious review under the Administrative Procedure Act. The Commission must therefore carefully consider the experiences of affected consumers before granting Verizon's petition.

Finally, the FCC should reconsider its decision to grant Verizon's prior applications in WC 26-116 and WC 26-170 and avoid treating telephone customers of member states differently despite parties and intervenors echoing the same concerns about replacement coverage, risks to public safety, and violating the public interest.[13] In its first prior application, Verizon requested streamlined approval to discontinue service in Alabama, Tennessee, Georgia, Iowa, and Mississippi impacting 8,080 residential and business POTS lines.[14] In the second application, Verizon requested approval to discontinue service in eight states, Florida, Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin, impacting 140,000 residential and business POTS lines.[15] Similar to WC Docket No. 26-227, a variety of parties intervened with

[13] *Petroleum Communications, Inc. v. F.C.C.*, 22 F.3d 1164, 1172, 306 U.S. App. D.C. 82, 90 (C.A.D.C., 1994) ("We have long held that an agency must provide adequate explanation before it treats similarly situated parties differently.") (citing *See, e.g., New Orleans Channel 20, Inc. v. FCC,* 830 F.2d 361, 366 (D.C.Cir.1987); *Public Media Center v. FCC,* 587 F.2d 1322, 1331 (D.C.Cir.1978); *Melody Music, Inc. v. FCC,* 345 F.2d 730, 733 (D.C.Cir.1965)).
[14] Section 63.71 Application of Verizon, WC Docket No. 26-116, at 1 ("Five State Petition").
[15] Verizon 214 Petition filed July 7, 2026 in Proceeding WC 26-170 at 2 ("Eight State Petition").

concerns and objections requesting removal of the streamlined application.[16] For example in 26-170, the Nebraska Public Service Commission requested that the Commission "allow for a more evidenced-based review of the geographic areas." [17]The Minnesota Department of Commerce and Office of the Minnesota Attorney General pointed out that heavily forested and hilly terrain can create conditions that deteriorate wireless performance.[18] These concerns directly call into question whether Verizon's proposed alternatives would provide adequate and reliable service throughout the affected areas.

Individual consumers have also shared their frustration with replacing a system that is reliable,[19] Others discussed concerns about natural disasters and the importance of reliability, and how the petition would impact rural areas and the ability to contact emergency services.[20] Like in this Application, the prior two applications harm the public interest and these harms are not

---

[16] *See* IRUC General Counsel's Office Letter filed August 5, 2026; Joint Comments of the Minnesota Department of Commerce and Minnesota Office of the Attorney General- Residential Utilities Division, Comments of the Nebraska Public Service Commission,

[17] *See* Comments of the Nebraska Public Service Commission, WC Docket No. 26-170 at 1, 13-14, 16-18.

[18] *See* Joint Comments of the Office of the Minnesota Attorney General and Minnesota Department of Commerce, WC Docket No. 26-170 at 3, 4 (citing *New Cingular Wireless PCS, LLC v. Clay Cnty., Mo.*, 2025 WL 3500544, at *1 (W.D. Mo., 2025) (discussing how providers of cellphone service need appropriate line of site, lack of obstruction to interact and provider reliable coverage to function); *APT Minneapolis, Inc. v. Stillwater Tp.*, 2001 WL 1640069, at *1 (D. Minn., 2001) ("The necessary number and location of the antennas is determined by radio frequency engineering which takes into account several factors including population demands, topographical constraints...").

[19] *See* Richards Comment Submitted July 23, 2026 in WC Docket No. 26-170; Arburg Comment Submitted July 27, 2026 in WC Docket No. 26-170; Oakley Comment Submitted August 14, 2026 in WC Docket No. 26-170.

[20] *See* Oakley Comment Submitted August 14, 2026 in WC Docket No. 26-170; Szczepankiewicz Commented Submitted August 14, 2026 in WC Docket No. 26-170; Thornton Comment Submitted August 18, 2026 in WC Docket No. 26-170; Pannatoni Comment Submitted August 21, 2026 in WC Docket No. 26-170; Pell Comment Submitted August 19, 2026 in WC Docket No. 26-170; Oneill Comment Submitted September 4, 2026 in WC Docket No. 26-170; Simonoff Comment Submitted August 24, 2026 in WC Docket No. 26-170.

distinguishable among the states. Instead, Verizon's choice to file to discontinue service in some jurisdictions before others would be the leading cause of disparate treatment.

NASUCA again thanks the Commission for the opportunity to file this letter and urges the Commission to deny Verizon's petitions that are still pending and rescind and reopen the petition considered "approved", and to take a hard look at the real effects this cessation of service is likely to have on some of the most remote and vulnerable households in the nation.

Respectfully submitted,

/S/ David Springe

David Springe, Executive Director
National Association of State Utility Consumer Advocates (NASUCA)
8777-B Piney Orchard Parkway Suite 173
Odenton, MD 21113
(785) 550-7606
david.springe@nasuca.org