



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
DELETE, DELETE, DELETE)	GN Docket No. 25-133
)	
To: The Commission		

**REPLY COMMENTS OF
NATIONAL TAXPAYERS UNION FOUNDATION**

April 28, 2025

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Introduction

On behalf of National Taxpayers Union Foundation (NTUF), I respectfully submit these reply comments in response to the Federal Communications Commission's (FCC) "DELETE, DELETE, DELETE" notice of inquiry.¹ Based in Washington, D.C., NTUF is the research and educational affiliate of National Taxpayers Union, the oldest taxpayer advocacy organization in the United States. NTUF conducts evidence-based policy research on economic, technology, and regulatory issues of interest to taxpayers, including U.S. and international approaches to artificial intelligence, emerging technologies, and data protection.

NTUF welcomes the Commission's recognition that creating a more favorable regulatory environment for technological innovation can enhance economic growth and global competitiveness. To that end, we appreciate the FCC's commitment to carefully reviewing existing regulations and programs to modernize telecommunications policy and support efficient, innovation-driven outcomes for consumers.

Our initial comments emphasized the importance of applying a balanced, evidence-based approach to reforming the Universal Service Fund: preserving programs that remain essential to public welfare while eliminating or modernizing outdated, duplicative, or unduly burdensome provisions. These reply comments build upon that foundation by reviewing a broader set of regulations that the Commission should consider keeping, amending, or eliminating.

More specifically, we:

- Support the retention of rules that continue to serve important transparency, accessibility, or public safety goals;
- Recommend specific reforms where regulatory mandates impose disproportionate burdens or have become misaligned with evolving market realities; and
- Encourage the Commission to adopt a proportionate, flexible approach that will enhance consumer protection, expand accessibility, support innovation, and bolster the competitiveness of the telecommunications sector.

By adopting a balanced, well-calibrated approach across a range of regulatory issues, from satellite spectrum policy to broadband deployment, the Commission can better align its regulatory frameworks with the needs of a rapidly changing economic landscape and strike a careful balance among competing priorities of technological innovation, data privacy, security, and the removal of regulatory barriers for small and medium-sized businesses.

¹ Federal Communications Commission, Public Notice: IN RE: DELETE, DELETE, DELETE, GN Docket No. 25-133, DA 25-219 (rel. Mar. 12, 2025).

I. Space, Spectrum, and Radio Communications Policy

1. Orbital Debris Management

Recommendation: Keep. Improve coordination with the National Aeronautics and Space Administration (NASA) and the Department of Defense.

The FCC's orbital debris mitigation rules require satellite operators to develop and submit plans for the safe disposal of spacecraft at the end of their operational lives.² As the number of satellites in orbit has increased dramatically with the expansion of commercial satellite constellations and small satellite deployments, concerns over orbital debris and space sustainability have become significantly more acute.³ Clear, enforceable debris mitigation standards are essential to preserving the long-term viability of key orbital regions and minimizing collision risks that could jeopardize satellite communications infrastructure, scientific missions, and future space operations.⁴

The Commission should retain the orbital debris mitigation requirements and continue to strengthen interagency coordination with NASA, the Department of Defense, and other relevant entities. Improving technical alignment and data sharing across agencies would enhance the effectiveness of debris mitigation efforts while ensuring that regulatory requirements reflect evolving best practices in orbital management. A coordinated approach would better safeguard orbital environments and strengthen the foundations for the long-term development of the commercial space sector.

2. Satellite Spectrum Policy

Recommendation: Keep but implement ongoing reviews to accommodate new entrants and technologies.

The FCC's satellite spectrum rules govern the licensing, allocation, and use of frequencies for satellite communication systems.⁵ Recent updates to these rules, such as streamlining licensing procedures and expanding flexible-use allocations, have enhanced opportunities for small satellite operators, commercial constellations, and emerging space-based services.⁶ As technological innovation accelerates and new classes of satellite services enter the market, maintaining flexible and predictable spectrum access remains critical to supporting competition and innovation in the U.S. space sector.⁷

In light of these developments, the Commission should retain its updated satellite spectrum framework but commit to periodic reviews to accommodate new entrants, technological

² 47 C.F.R. § 25.114(d)(14) (2024).

³ *Mitigation of Orbital Debris in the New Space Age*, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-54, 35 FCC Rcd 4156 (2020).

⁴ *Id.* at 4157.

⁵ 47 C.F.R. pts. 25, 101 (2024).

⁶ *Streamlining Licensing Procedures for Small Satellites*, Report and Order, FCC 19-81, 34 FCC Rcd 13077 (2019).

⁷ *Facilitating Satellite Broadband Competition Through Streamlined Satellite and Earth Station Licensing Rules*, Notice of Proposed Rulemaking, FCC 24-31, 89 FED. REG. 32558 (2024).

developments, and evolving market dynamics. Flexibility in licensing procedures, efficient spectrum sharing mechanisms, and regulatory predictability are essential to balancing the needs of incumbent users, new commercial operators, and broader public interest objectives. A well-calibrated, forward-looking spectrum policy is essential to supporting long-term growth and innovation in the satellite communications sector.

3. Foreign Ownership Restrictions for Broadcast Licenses

Recommendation: Keep and reform. Maintain but liberalize reporting requirements and streamline waiver processes.

The FCC’s foreign ownership rules cap foreign investment in U.S. broadcast licensees at 25%, with waivers allowed subject to public interest demonstration.⁸ These restrictions were originally grounded in national security and public policy concerns regarding control of domestic communications infrastructure. However, the rigid application of ownership caps can unnecessarily restrict access to capital, deter foreign investment in U.S. media markets, and create compliance complexity without necessarily advancing security objectives.

Accordingly, the Commission should consider liberalizing the foreign ownership framework for broadcast licenses while maintaining appropriate transparency and oversight mechanisms. More specifically, reporting requirements should be preserved to monitor foreign ownership structures, but the waiver process should be streamlined to provide greater predictability and reduce administrative delays for applicants. A more flexible, risk-based approach would align regulatory policy with modern investment realities while safeguarding legitimate national security interests through targeted review rather than blanket restrictions.

4. Amateur Radio Rules (Part 97)

Recommendation: Keep and amend. Remove obsolete provisions and modernize technical standards.

The Federal Communication Commission’s Part 97 rules govern non-commercial amateur radio operations, establishing technical standards, licensing procedures, and operating expectations for amateur operators.⁹ Amateur radio continues to serve valuable purposes, including emergency communications support, technical experimentation, and promoting public interest in telecommunications technologies.¹⁰ However, several provisions within Part 97 have become

⁸ 47 U.S.C. § 310(b) (2024) (enacted by the Communications Act of 1934, PUB. L. NO. 73-416, 48 Stat. 1064).

⁹ 47 C.F.R. pt. 97 (2024).

¹⁰ FCC, *Amateur Radio Service*, <https://www.fcc.gov/wireless/bureau-divisions/mobility-division/amateur-radio-service> (last updated June 23, 2021).

increasingly outdated due to technological advancements, changes in communications practices, and the evolution of emergency response systems.¹¹

Considering these developments, the Commission should consider amending Part 97 to remove obsolete requirements and modernize technical standards while preserving the core functions of amateur radio. Updating equipment specifications, streamlining licensing processes, and eliminating legacy rules that no longer reflect contemporary practices would reduce unnecessary regulatory burden and support the needs of the amateur radio service. A targeted modernization effort would enhance the relevance and functionality of the amateur service while ensuring that regulatory structures keep pace with technological change and market developments.

5. General Mobile Radio Service and Personal Radio Services

Recommendation: Reform. Eliminate license requirements and harmonize technical rules with unlicensed personal radio services.

The General Mobile Radio Service (GMRS) provides short-distance, two-way voice communications for personal, family, and group use, operating in the 462 and 467 MHz bands.¹² Unlike similar services such as the Family Radio Service (FRS), GMRS still requires users to obtain an individual license, complete an application process, and pay a licensing fee.¹³ Although GMRS and FRS equipment are increasingly integrated into the same consumer devices, the licensing distinction between the two services persists, contributing to consumer confusion and imposing administrative burdens disproportionate to any public benefits achieved.¹⁴

Accordingly, the FCC should eliminate the individual licensing requirement for GMRS and harmonize technical rules with unlicensed personal radio services. Given the widespread integration of GMRS functionality into consumer devices and functional overlap with services that operate without a license, the current framework for GMRS is increasingly difficult to justify. Reforming the GMRS licensing regime would simplify the regulatory environment, reduce compliance costs, and promote more consistent consumer access to short-distance communication technologies while preserving appropriate technical standards to minimize radio interference.

II. Broadband Deployment

1. Broadband Consumer Label

Recommendation: Keep but amend. Maintain the core requirement but simplify label content and streamline compliance requirements, especially for smaller internet service providers (ISP).

¹¹ *Amendment of Part 97 of the Commission's Amateur Radio Service Rules to Modernize Communication Modes and Technologies*, Notice of Proposed Rulemaking, FCC 22-82, 87 FED. REG. 76345, ¶¶ 1–3, 6 (2022).

¹² 47 C.F.R. § 95.1703 (2024).

¹³ 47 C.F.R. § 95.1705 (2024).

¹⁴ *Amendment of Part 95 Personal Radio Services Rules*, Report and Order, FCC 17-57, 32 FCC Rcd 4292 (2017).

The Broadband Consumer Label requirement seeks to promote transparency by mandating that ISPs disclose certain service attributes, such as price, speed, and data allowances, in a standardized format.¹⁵ While transparency remains a critical consumer protection goal, the current label format risks overwhelming consumers with excessive technical detail and imposes relatively greater compliance burdens on smaller providers.¹⁶

In light of these concerns, the Commission should retain the label requirement but simplify its core content to highlight essential service characteristics, while relegating secondary technical information to supplemental disclosures.¹⁷ Compliance obligations should also be scaled based on provider size and subscriber base, enabling small and rural providers to meet core label requirements without being subject to the additional compliance obligations applicable to larger entities. A proportionate, streamlined approach would better align the provision's intended purpose of enabling transparency and informed consumer choice while minimizing disproportionately higher regulatory burdens for smaller, rural ISPs.

2. Pole Attachment Rules

Recommendation: Keep. Maintain access guarantees but encourage expedited resolution of disputes and equitable rate structures.

Pole attachment rules are essential in supporting broadband deployment, particularly in rural, underserved areas, where the costs of building new infrastructure independently can be prohibitive for internet service providers.¹⁸ By allowing ISPs to attach equipment to existing utility poles at regulated rates and terms, the current framework seeks to lower barriers to entry, promote network expansion, and enhance service competition.¹⁹ However, bureaucratic delays by local and municipal governments in granting access and protracted dispute-resolution processes can significantly impede deployment timelines and increase costs, particularly for smaller and regional providers.²⁰

Therefore, streamlining the adjudication process and promoting equitable, cost-based rate structures would reduce bureaucratic deployment barriers while preserving adequate protections for existing infrastructure owners. A balanced approach would ensure that pole attachment policies continue to support broadband expansion and accessibility while respecting the legitimate operational and investment interests of both internet service providers and private-sector pole owners.

¹⁵ *Broadband Consumer Labels*, Report and Order, FCC 23-32, 88 FED. REG. 37626 (June 8, 2023).

¹⁶ FCC 22-86 at ¶¶ 73–76.

¹⁷ See FCC 22-86 at ¶¶ 73–76 (acknowledging concerns about regulatory confusion and burdens on small providers).

¹⁸ *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Third Report and Order and Declaratory Ruling, WC Docket No. 17-84, FCC 18-111, at ¶¶ 112–115 (2018).

¹⁹ FCC 18-111 at ¶¶ 2, 112–115.

²⁰ FCC 18-111 at ¶¶ 112–115.

3. Copper Retirement Rules

Recommendation: Amend. Retain consumer protection while targeting procedural rigidity that impedes technological upgrades.

The copper retirement rules require broadband providers to notify the FCC and affected customers before discontinuing legacy copper-based services.²¹ While these requirements were designed initially to safeguard consumers during technological transitions, they now risk impeding the deployment of faster broadband infrastructure by introducing procedural complexity and prolonging reliance on outdated networks.²² Furthermore, as some providers noted in prior filings to the Commission, maintaining legacy copper networks often diverts resources from investing in more resilient, higher-performance broadband technologies without delivering commensurate consumer benefits.²³

Considering these challenges, the Commission should amend the existing rules to preserve essential consumer protections, such as providing reasonable notice to affected customers, while streamlining procedural requirements that unnecessarily delay network modernization. Such reform would better reflect the current technological developments and market conditions, as modern fiber-based and next-generation broadband services are superior to copper-based connections in speed and reliability.²⁴ Modernizing the copper retirement framework would help ensure that regulatory obligations facilitate, rather than impede, investment in future networks while minimizing redundant infrastructure costs for providers and consumers.

4. Public Mobile Services (Part 22)

Recommendation: Eliminate. Remove obsolete regulatory provisions while preserving only those rules necessary to govern remaining legacy services.

The Commission's Public Mobile Services (Part 22) rules govern early mobile radio services, including analog cellular networks and paging systems that originated several decades ago.²⁵ Although these rules were essential in regulating mobile communications during the early years of wireless technologies, advances in technology since then have greatly reduced their relevance. Most mobile services operate under more modern regulatory frameworks codified in Part 27 (which applies to Advanced Wireless Services (AWS), Personal Communications Services (PCS), and 600 MHz services) and Part 90 (which applies to private land mobile radio services). In contrast, the number of active licenses remaining under Part 22 remains limited and continues to decline as

²¹ 47 C.F.R. §§ 51.325–51.335.

²² *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, WC Docket No. 17-84, FCC 17-154 at ¶¶ 4, 67, 71 (2017).

²³ FCC 17-154 at ¶ 71.

²⁴ *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Third Report and Order, WC Docket No. 17-84, FCC 18-111 at ¶¶ 2, 130 (2018).

²⁵ 47 C.F.R. pt. 22 (2023).

carriers transition to digital, Internet Protocol (IP)-based, and higher-bandwidth mobile technologies.²⁶

In light of these developments, maintaining Part 22 regulations in their entirety imposes significant administrative costs without delivering commensurate consumer protection or regulatory oversight benefits. Many of the technical standards embedded in Part 22 are outdated, based on analog technologies that no longer underpin commercial networks.²⁷ Therefore, the Commission should repeal provisions within Part 22 that are no longer necessary, retaining only those few rules necessary to ensure continuity for residual specialized or non-commercial licensees.

III. Consumer and Data Protection

1. Robocall Restrictions

Recommendation: Keep. Retain current rules while expanding enforcement capacity and technological traceability.

The FCC’s restrictions on autodialed and prerecorded calls without prior consent remain among its most publicly recognized and broadly supported consumer protection measures.²⁸ Despite substantial enforcement activity, robocalls continue to be a significant source of consumer frustration and fraud.²⁹ The volume of illegal and unwanted robocalls undermines public trust in telecommunications networks and poses tangible privacy and economic harm to consumers.³⁰

The Commission should retain the current robocall restrictions while prioritizing stronger enforcement mechanisms and enhanced technological traceability. Expanding the adoption of caller authentication frameworks, such as STIR/SHAKEN protocols, and improving coordination with state and federal enforcement partners would bolster the Commission’s ability to identify violators, deter unlawful conduct, and maintain public confidence in the telecommunications system.³¹

2. TCPA Consent Revocation

Recommendation: Amend. Clarify permissible revocation channels and establish a safe harbor framework.

Under the Telephone Consumer Protection Act (TCPA), consumers can revoke consent to receive autodialed or prerecorded calls through any “reasonable” method.³² While intended to ensure broad consumer protection, the lack of specificity regarding acceptable revocation channels has created

²⁶ 47 C.F.R. pt. 27 (2023); 47 C.F.R. pt. 90 (2023).

²⁷ *Review of the Commission’s Part 95 Personal Radio Services Rules*, Report and Order, FCC 17-57, 32 FCC Rcd. 4292 (2017).

²⁸ 47 U.S.C. § 227; 47 C.F.R. § 64.1200 (2024); *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC 18-177, 34 FCC Rcd 4876, 4879–80 (2019).

²⁹ FCC, *Report on Robocalls and Spoofing*, CG Docket No. 17-59, at 4–5 (2022).

³⁰ *Id.* at 4–5.

³¹ *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, Declaratory Ruling and Order, FCC 15-72, 30 FCC Rcd 7961, ¶¶ 55–63 (2015).

³² *Id.* at ¶¶ 55–63.

legal ambiguity and heightened compliance risks for legitimate businesses.³³ Inconsistent judicial interpretations and varying consumer expectations complicate efforts to maintain accurate consent records and implement effective opt-out mechanisms.

As one possible solution, the Commission should consider amending its rules to specify acceptable methods for consent revocation and establish a safe harbor framework for businesses that adopt clearly defined opt-out procedures. Providing standardized revocation channels would reduce compliance uncertainty while preserving consumers' right to withdraw consent easily and effectively. A balanced approach would protect consumer privacy and autonomy without exposing providers to unpredictable litigation risks.

3. SIM Swap Recordkeeping

Recommendation: Keep. Retain the rule while encouraging the adoption of secure customer authentication practices.

The Commission's requirement that wireless providers maintain records of SIM card changes serves as a safeguard against identity theft and fraud. SIM swap attacks—where criminals illicitly transfer a user's phone number to another SIM card to access sensitive accounts—have increased significantly in recent years, exposing consumers to financial loss, data breaches, and unauthorized account access. In this context, the Commission's recordkeeping requirement is critical in promoting accountability, facilitating investigations, and strengthening data security for mobile users.³⁴

While the rule remains an essential element of consumer protection, complementary measures could further strengthen its effectiveness. For example, encouraging providers to implement additional secure authentication measures, such as multi-factor identity verification or the use of secure PINs before SIM card changes, would further mitigate risks of fraud.³⁵ Such authentication steps would reinforce the recordkeeping obligations by reducing the incidence of unauthorized SIM changes, enhancing consumer trust and promoting greater security in mobile telecommunications services.

4. Data Breach Notification Requirements

Recommendation: Amend. Better align breach notification obligations with broader privacy law.

The Commission's data breach notification rules require reporting of certain customer data breaches even when no concrete harm to consumers has been demonstrated.³⁶ While these rules seek to promote timely transparency, the absence of a materiality threshold and the growing divergence from state and federal privacy frameworks present significant compliance challenges. Nevertheless,

³³ *Id.* at ¶¶ 55–63.

³⁴ *Amendments to CPNI Rules to Protect Consumers from SIM Swap and Port-Out Fraud*, Report and Order, FCC 22-99, FED. REG. 79190, ¶¶ 1–5 (2022).

³⁵ See FCC, *Protecting Consumers from SIM Swap and Port-Out Fraud*, <https://www.fcc.gov/sim-swap-and-port-out-fraud> (last updated Mar. 28, 2024).

³⁶ *Data Breach Reporting Requirements for Telecommunications Carriers and Interconnected VoIP Providers*, Report and Order, FCC 23-111, 89 FED. REG. 16488 (2024).

timely notification remains critical to protecting consumer privacy and maintaining trust in telecommunications services.

Given the rising importance of safeguarding personal data, the breach notification requirement should be retained but refined. More specifically, the Commission should seek to align breach reporting obligations with emerging national and state-level privacy frameworks, emphasizing uniform national standards and harm-based reporting thresholds. A more consistent and risk-based approach would enhance consumer protection, improve regulatory clarity, and help streamline the increasingly complex patchwork of overlapping federal and state privacy requirements.

5. Consumer Privacy and Identity Verification

Recommendation: Keep as is.

The Commission's requirement that providers verify a consumer's identity before granting access to account information remains a fundamental and necessary safeguard against unauthorized access.³⁷ With the increasing prevalence of identity theft and fraud, ensuring that only properly authenticated users can modify or obtain sensitive account information is essential to data security and trust in telecommunications services.³⁸

Considering such risks, the FCC should consider retaining this provision without any modification. Eliminating or weakening identity verification requirements would expose consumers to greater risks of fraud and data breaches, undermining efforts to safeguard data privacy and security. The modest compliance burden imposed by the rule is outweighed by its critical role in preserving consumer security and mitigating vulnerabilities in an environment of evolving cybersecurity threats.

6. Transparency Rules for Broadband Pricing

Recommendation: Keep as is.

The broadband transparency rules, mandated under the Infrastructure Investment and Jobs Act, require providers to disclose clear and standardized information regarding broadband pricing, speeds, and service terms.³⁹ These rules seek to enhance transparency, promote informed decision-making, and strengthen competitive discipline among providers by ensuring that consumers have access to comparable and accurate information at the point of sale.⁴⁰

³⁷ *Protecting Consumers from SIM Swap and Port-Out Fraud*, Report and Order and Further Notice of Proposed Rulemaking, FCC 23-99 at ¶¶ 1–5, 88 FED. REG. 79190 (2023).

³⁸ *Id.* at ¶¶ 10–15.

³⁹ Infrastructure Investment and Jobs Act, PUB. L. NO. 117-58, § 60504, 135 Stat. 429, 1248–1251 (2021).

⁴⁰ *Broadband Consumer Labels*, Report and Order and Further Notice of Proposed Rulemaking, FCC 22-86, 87 FED. REG. 76030 (2022).

Considering its benefits, the FCC should retain the current framework.⁴¹ While compliance requires some operational adjustments by broadband providers, the associated regulatory burdens appear broadly proportionate to the substantial consumer benefits achieved. Clear disclosure requirements further mitigate information asymmetries, reinforcing competitive pressures and enabling consumers to make more informed choices among service offerings. Maintaining strong transparency standards remains an essential complement to broader efforts to promote affordability and expand access to high-quality broadband services.

III. Media Ownership and Broadcasting Regulations

1. Local Radio Ownership Limits

Recommendation: Amend. Relax ownership limits, particularly in mid-sized and large markets where digital substitutes are abundant.

The FCC's Local Radio Ownership Rule limits the number of AM and FM stations a single entity can own within a given market, with caps scaled according to market size.⁴² For example, in markets with 45 or more stations, a single entity may own up to eight stations, with no more than five in the same service (AM or FM).⁴³ Originally designed to prevent excessive concentration in a legacy broadcast environment, these rules reflected the technological and market conditions of a pre-digital media landscape.

However, the rapid growth of digital streaming services, podcasts, satellite radio, and other online content platforms has substantially diversified audio media markets and expanded consumer choice, reducing the relative importance of AM and FM stations within a broader and more dynamic ecosystem.⁴⁴ At the same time, the shift of audiences toward digital media has increased competitive and financial pressures on traditional radio broadcasters, which must now compete against larger national and global digital platforms.

Accordingly, the Commission should amend the Local Radio Ownership Rule to relax existing limits, particularly in mid-sized and larger markets where digital substitutes are widely available. Updating ownership caps to reflect the broader competitive ecosystem would better align regulatory policy with current market realities, promote efficiencies of scale in local broadcasting, and enhance the ability of traditional radio stations to compete for audiences and advertising revenue in an increasingly fragmented media environment.

⁴¹ Moreover, the Infrastructure Investment and Jobs Act of 2021 imposes a statutory obligation on the Commission to implement broadband consumer labeling and transparency measures. As a result, the Commission may not rescind these requirements unless and until Congress modifies the underlying statutory mandate. See Infrastructure Act § 60504(a).

⁴² 47 C.F.R. § 73.3555(a) (2023).

⁴³ 47 C.F.R. § 73.3555(a)(1)(i) (2023).

⁴⁴ 2022 *Communications Marketplace Report*, GN Docket No. 22-203, 37 FCC Rcd 15514, 15689–90 ¶¶ 295, 297 (2022).

2. Public Inspection File Requirements

Recommendation: Keep. Retain core obligations while continuing to digitize and simplify reporting.

The Public Inspection File requirements mandate that broadcasters maintain accessible records related to ownership, public affairs programming, political advertising, and related compliance information.⁴⁵ These obligations are designed to promote accountability and transparency and provide regulators and the public with insights into how broadcast providers serve the public interest. However, compliance can impose substantial administrative burdens, particularly on smaller stations with limited personnel and technical capabilities.⁴⁶

While the transparency benefits of the Public Inspection File remain important, continued efforts are necessary to reduce these compliance burdens, particularly for smaller broadcasters. The core obligations should be retained, but further digitization and streamlining of reporting processes would help reduce unnecessary costs. Expanding centralized electronic filing systems and simplifying required disclosures would allow broadcasters to meet transparency goals more efficiently, preserving public access to meaningful information without unduly straining operational capacities, especially for small and independent stations.

3. Lowest Unit Charge for Political Advertising

Recommendation: Keep as is.

The FCC's Lowest Unit Charge (LUC) rule mandates that broadcasters offer legally qualified political candidates the lowest rate charged for comparable advertising time during designated election periods.⁴⁷ This requirement is designed with a view to promoting fairness in political communication and ensuring continued access to broadcast media, particularly for less well-funded campaigns.⁴⁸ Ensuring candidates' access to affordable advertising opportunities supports broader democratic participation and strengthens the competitiveness of the electoral process.⁴⁹

Eliminating or weakening this protection would risk giving disproportionate advantages to wealthier candidates and incumbents with greater financial resources. Maintaining equitable access to broadcast airtime remains essential to preserving the integrity and competitiveness of the electoral system. As such, the Commission should retain the Lowest Unit Charge rule without modification.

⁴⁵ 47 C.F.R. § 73.3526 (2023); 47 C.F.R. § 73.3527 (2023).

⁴⁶ See *Expansion of Online Public File Obligations to Cable and Satellite TV Operators and Broadcast and Radio Licensees*, Report and Order, 31 FCC Rcd 526, 530–31 ¶¶ 9–10 (2016).

⁴⁷ 47 U.S.C. § 315(b).

⁴⁸ 47 C.F.R. § 73.1942 (2023).

⁴⁹ 47 U.S.C. § 315(b); 7 C.F.R. § 73.1942 (2023).

4. Foreign Sponsorship Identification for Broadcast Programming

Recommendation: Keep and amend. Retain core requirements but simplify documentation processes.

The FCC’s Foreign Sponsorship Identification rule, developed in 2021, requires broadcasters and cable operators to disclose when foreign governments, affiliated entities, or political parties sponsor programming.⁵⁰ These requirements were designed to serve national security and transparency objectives by ensuring that audiences are made aware when content is foreign funded.⁵¹

While concerns about foreign information operations have risen in recent years, available evidence suggests that radio and television stations are not primary targets for such operations. Foreign influence operations have been more closely associated with social media platforms and digital media channels rather than traditional broadcast outlets.⁵² Nevertheless, maintaining clear disclosure obligations for broadcasting remains important to uphold public trust and preserve transparency within the broader communications landscape.

As such, the Commission should retain the core disclosure requirements but amend the current rules to streamline compliance. Simplification efforts could include adopting a risk-tiered compliance framework, providing standardized certification templates, creating safe harbors for good-faith certification compliance, and clarifying diligence obligations and endpoints. Such measures would preserve transparency and national security safeguards while reducing unnecessary operational complexity and ensuring that compliance efforts remain focused on genuine risks.

V. Disability Access and Emergency Services

1. Hearing Aid Compatibility Requirements for Wireless Handsets

Recommendation: Keep as is.

The FCC’s hearing aid compatibility rules require that wireless handsets be designed and manufactured to support users with hearing aids, ensuring that individuals with hearing impairments can access essential mobile communication services.⁵³ Although device innovation has accelerated

⁵⁰ *Sponsorship Identification Requirements for Foreign Government-Provided Programming*, Report and Order, FCC 21-42, 36 FCC Rcd 5922 (2021).

⁵¹ *Id.* at ¶ 2.

⁵² See, e.g., Office of the Director of National Intelligence, *Foreign Threats to the 2020 U.S. Federal Elections*, March 2021, <https://www.dni.gov/files/ODNI/documents/assessments/ICA-declass-16MAR21.pdf>; U.S. Senate Select Committee on Intelligence, *Report on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election*, Vol. 2, 2019, https://www.intelligence.senate.gov/sites/default/files/documents/Report_Volume2.pdf.

⁵³ 47 C.F.R. § 20.19 (2023).

and many manufacturers have voluntarily offered improved accessibility features, particularly for higher-end devices, market forces alone have not consistently ensured universal compatibility.⁵⁴

More specifically, lower-cost and mid-range devices have lagged in compliance—a gap that could widen further with the deployment of 5G technologies and emerging network standards, as the FCC recognized in the *Hearing Aid Compatibility Report and Order* in 2020.⁵⁵ Given the increasing centrality of mobile connectivity to economic opportunities and emergency communications, preserving clear compatibility standards remains necessary to prevent the reemergence of access barriers.

Given these concerns, the Commission should retain the hearing aid compatibility requirements. Regulatory standards continue to play a critical role in guaranteeing baseline accessibility across a heterogeneous mobile device marketplace and ensuring that accessibility obligations evolve alongside communications technologies. Maintaining these protections is essential to promoting access, supporting public safety objectives, and advancing the broader goal of universal service.

2. Text-to-911 Service

Recommendation: Keep as is.

The FCC’s Text-to-911 framework enables individuals to contact emergency services by text message in jurisdictions where local public safety answering points (PSAPs) have deployed the necessary technology.⁵⁶ This service is particularly critical for individuals with hearing or speech impairments, for whom traditional voice communication may be inaccessible. In addition, the framework provides an essential backup channel during network congestion or emergencies where voice services are disrupted, offering an additional layer of resilience to the emergency communications infrastructure.⁵⁷

Considering these benefits, the FCC should retain the Text-to-911 rules. As mobile communications technology continues to evolve, maintaining multiple pathways for emergency access remains a critical component of public safety policy. The Text-to-911 requirement ensures that individuals who cannot place a voice call, whether due to disability, network conditions, or other barriers, retain the ability to request emergency assistance. Continued support for this capability is essential to promoting accessibility, public safety, and the broader goal of universal service.

⁵⁴ *Amendment of the Commission’s Rules Governing Standards for Hearing Aid-Compatible Handsets*, Report and Order, FCC 20-155, 35 FCC Rcd 12588 (2020).

⁵⁵ *Id.* at ¶ 3.

⁵⁶ *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, Report and Order and Further Notice of Proposed Rulemaking, FCC 14-118, 29 FCC Rcd 9846 (2014).

⁵⁷ *Id.* at 9848 ¶ 4.

3. Wireless Emergency Alerts and Enhanced 911 (E911) Accuracy

Recommendation: Keep as is.

The Wireless Emergency Alerts (WEA) system enables authorized government agencies to send geographically targeted emergency alerts to mobile devices, including alerts for natural disasters, missing children (AMBER Alerts), and public safety threats.⁵⁸ By delivering time-sensitive warnings directly to individuals' mobile devices, WEA enhances the emergency communications infrastructure's reach, speed, and overall effectiveness.⁵⁹ The WEA system also provides critical support for individuals lacking immediate access to broadcast or wired communication channels during emergencies.⁶⁰

Considering their importance, the Commission should retain the wireless emergency alert provisions without modification. WEA remains an essential component of the national emergency communications framework, particularly as mobile device usage continues to increase across all demographic groups. Maintaining strong WEA requirements ensures that emergency managers can deliver targeted, life-saving information quickly and broadly. Continued support for WEA is essential to protecting public safety and ensuring that the emergency communications system remains effective and accessible.

4. Accessibility Requirements for Advanced Communications Services

Recommendation: Keep as is.

The Twenty-First Century Communications and Video Accessibility Act (CVAA) requires that providers of advanced communications services, such as text messaging, email, video conferencing, and interconnected voice services, ensure their offerings are accessible to users with disabilities.⁶¹ As digital communication technologies have become more central, the CVAA requirements have played an essential role in embedding accessibility into the design of emerging services. By setting clear accessibility obligations early in the technology development cycle, the CVAA framework seeks to support the development of telecommunications technologies that are accessible by design.⁶²

Considering its importance, the Commission should retain the CVAA framework without modification. Ensuring that new communications platforms remain accessible to individuals with hearing, vision, speech, or mobility impairments is essential to preserving meaningful participation in society, including employment, education, healthcare, and public services. Continued enforcement

⁵⁸ 47 C.F.R. 10.400 (2024).

⁵⁹ 47 C.F.R. § 10.1 (2024).

⁶⁰ *Id.*

⁶¹ Twenty-First Century Communications and Video Accessibility Act of 2010, PUB. L. NO. 111-260, 124 Stat. 2751 (codified at 47 U.S.C. §§ 153(1), 255, 617, 619 (2024)).

⁶² *Id.* at §§ 617, 619.

of the CVAA framework is essential to preventing the reemergence of accessibility gaps as technologies evolve, thereby reinforcing both accessibility and broader universal service objectives.

Conclusion

The Commission should eliminate the remaining paper-based reporting and notification requirements and implement full digital reporting wherever feasible. Transitioning fully to electronic systems would streamline compliance, reduce administrative costs for both regulated parties and the Commission itself, and enhance transparency and data accessibility for the public. Modernizing these processes would align the Commission's practices with broader government-wide digital modernization initiatives while preserving the substantive informational objectives underlying existing reporting rules.

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