

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

In the Matter of)	
)	
Delete, Delete, Delete)	GN Docket No. 25-133
)	

**REPLY COMMENTS OF
THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

I. Introduction

The Telecommunications Industry Association (“TIA”) appreciates the opportunity to provide reply comments on the Federal Communications Commission’s (“FCC” or “the Commission”) Public Notice (“PN”) seeking input on potential Commission regulations that could potentially be streamlined or revised. TIA appreciates the broad interest shown by commenters for the Commission’s deregulatory effort and supports many of the parties’ proposals. Commenters suggested several helpful proposals that would streamline and simplify many issues facing manufacturers of information communications technology (“ICT”) equipment without harming consumers or the Commission’s mission. Specifically, TIA supports the record’s emphasis on updating the Commission’s equipment authorization rules and regulations constraining the importation of next-generation devices. For similar reasons, TIA supports proposals to streamline regulatory burdens for removing copper from legacy networks.

II. Commenters Agree That the Commission Has Several Opportunities to Streamline Existing Equipment Authorization Rules Without Generating Any Risk of Harmful Interference or Harming Consumers.

Commenters joined TIA in urging that the Commission “undertake a comprehensive review of its existing regulations in its equipment authorization program.”¹ This is appropriate because the “equipment authorization process is widely viewed as fragmented and complex, creating challenges for technology equipment manufacturers seeking efficient market access.”² As a result, revisiting the equipment authorization regulations “would have a substantial positive impact on both ICT manufacturers and vendors, as well as everyday U.S. consumers.”³

Commenters Agree that the Commission Should Expand the Existing Supplier’s Declaration of Conformity (“SDoC”) Process. The record is clear that more radiofrequency (“RF”) devices could and should be equipment authorized with the SDoC process rather than certification.⁴ Hewlett Packard Enterprise (“HPE”) correctly observes that “[n]ot only is the SDoC program faster and cost[] convenient, the SDoC program additionally offers innovative and advanced capabilities for manufacturers to quickly compete with revolutionary solutions or technology beyond the confinement of FCC certification standards.”⁵ The Information Technology Industry Council (“ITI”) notes that “the FCC could move some lower risk intentional radiators, or even all intentional radiators over time, to the SDoC process in lieu of Certifications, similar to the process that currently works for the EU.”⁶ Similarly, CTIA

¹ See TIA Comments at 2; *see also* U.S. Chamber Comments at 13-14 (requesting the Commission “pursue an omnibus review of the equipment certification process to remove regulatory red tape to bolster innovation in the electronic device industry”).

² ITI Comments at 2.

³ TIA Comments at 2.

⁴ See, e.g., CTA Comments at 2; CTIA Comments at A-8; HPE Comments at 2; ITI Comments at 3.

⁵ HPE Comments at 2.

⁶ ITI Comments at 2.

advocates expanding SDoC to all Part 15 devices.⁷ TIA encourages the Commission to seriously consider these proposals and begin proceedings to expand the use of SDoC to authorize a wider variety of RF devices to reduce unnecessary burdens on manufacturers and vendors in ways that will ultimately benefit consumers through lower costs and improved access to innovative products.

TIA Supports Commenters Advocating for Common Sense Reform of the FCC's Knowledge Database ("KDBs"), including Pre-Approval Guidance ("PAG"). The Commission's equipment authorization rules are heavily supported and fleshed out by KDB publications and the KDB inquiry process, which allows for a direct dialogue with the FCC Lab. Although this combination of public and private guidance is tremendously useful for determining compliance with the Commission's rules, it has led to "restrictions [that] are not reflected in the Rules" or are otherwise outdated.⁸ TIA agrees that the Commission "should review and update guidance documents to remove antiquated restrictions not in line with current technological advancements."⁹ Likewise, removing or significantly reducing the technologies on the PAG list "will relieve unnecessary burdens of workloads on the FCC" as well as reduce the risk of "delays on the manufacturer/supplier production deadline or creating other manufacturer/supplier constraints."¹⁰ Commenters generally agree that if the PAG process remains in place,

⁷ CTIA Comments at A-8.

⁸ See U.S. Chamber Comments at 13; *see also* MWF Comments at 3 ("Over time, certain procedures required by the FCC Lab for product certification have either taken on a redundancy or become unnecessary.").

⁹ See U.S. Chamber Comments at 13; *see also* CTA Comments at 2 (suggesting reforms to specific KDB publications); CTIA Comments at A-10 (suggesting reforms to other KDB publications); MWF Comments at 4-5 (same).

¹⁰ HPE Comments at 2-3.

technologies should only be listed for the minimum amount of time necessary for the Commission and industry to become accustomed to authorizing the technologies.¹¹

The Record Supports Modernizing Existing Disclosure and Labeling Rules. Commenters echo TIA's request that the Commission should streamline its labeling and other disclosure rules.¹² The Mobile & Wireless Forum ("MWF") correctly observes that combining QR code technology with comprehensive product information achieves the goal of providing users with information necessary to use a product appropriately far better than outmoded requirements for packaging or product labels.¹³ Therefore, the Commission should rescind the proscriptions on QR codes or RFID tags in lieu of on-screen display of information or external packaging information and generally allow for significantly more digital labeling.¹⁴ Like TIA, CTIA also supports deleting Rule 15.105(b) as no longer relevant.¹⁵

III. The Record Supports the Revision of Existing Import Rules and Limits.

Commenters suggest various ways to reform the importation conditions for RF devices.¹⁶ For example, the record overwhelmingly supports removing certain importation limits on the

¹¹ See CTIA Comments at A-9 (technologies should not be on the PAG list for more than two years); ITI Comments at 2-3 (asserting that the PAG process should after it has been used on a technology for 12 months, and no more than two years); MWF Comments at 3 (advocating that technologies on the PAG list should be deleted after a technology is used for 18 months, and after 18 months, the review authority for Data Referencing can be delegated to a TCB).

¹² See TIA Comments at 3-4; *see also* CTIA Comments at A-9 – A-10; ICLE Comments at 16 (requesting the FCC remove unintentional radiator compliance statements for professional-grade satellite hardware as these "mandates add complexity without any substantial consumer-protection benefit"); ITI Comments at 4-6.

¹³ MWF Comments 6-8.

¹⁴ See *id.*; *see also* CTA Comments at 3; CTIA Comments at A-9; ITI Comments at 4-6; TIA Comments at 3-4.

¹⁵ CTIA Comments at A-10; TIA Comments at 4.

¹⁶ See, e.g., TIA Comments at 6 ("This rule sets forth eleven separate, permissible reasons that RF devices can enter the country. The Commission should review these requirements and remove or at least streamline some of them").

number of devices that can enter the country with respect to pre-sale and pre-authorization certification device importation limits.¹⁷ The U.S. Chamber observes that “the low cap means that devices may not be able to be displayed at all retail locations when the devices are first launched, and there will be delays in fulfilling pre-orders for devices.”¹⁸ CTIA similarly recommends easing restrictions in the import conditions to reflect marketplace realities and deleting the recordkeeping requirements in Rule 2.1204(b).¹⁹ TIA recommends that the Commission heed these suggestions to support more access to innovative devices.

IV. TIA Supports Streamlining the Commission’s Process for Removal of Copper from Legacy Networks.

TIA agrees with the many commenters that urge the Commission to build on its efforts to streamline the process for network modernization and associated copper retirement.²⁰ TIA commends Chairman Carr for his recent actions directing the Wireline Competition Bureau to provide waivers and clarifications to ease some of the regulatory burdens associated with network modernization,²¹ and is encouraged that the Chairman views these as just “an initial set

¹⁷ CTA Comments at 3; ITI Comments at 4; U.S. Chamber Comments at 14.

¹⁸ U.S. Chamber Comments at 14.

¹⁹ CTIA Comments at A-9.

²⁰ See Comments of the International Center for Law and Economics at 18 (“ICLE Comments”); Comments of the International Technology Industry Counsel ITIC at 3 (“ITIC Comments”); Comments of the Taxpayers Protection Alliance at 1-3 (“TPA Comments”); Comments of the U.S. Chamber of Commerce at 19-20 (“Chamber Comments”); Comments of USTelecom – The Broadband Association at 4-6; Comments of Verizon at 11-12.

²¹ *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment et al.*, Order, DA 25-248 (WCB rel. Mar. 20, 2025); *Technology Transitions*, Order on Clarification, DA 25-250 (WCB rel. Mar. 20, 2025); *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Order, DA 25-251 (WCB rel. Mar. 20, 2025); *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Order, DA 25-252 (WCB rel. Mar. 20, 2025).

of actions.”²² TIA agrees with USTelecom and Verizon that the Commission should work towards making the Bureau’s waivers permanent through codification or other means.²³

The Commission’s discontinuance and network change notification rules force providers to expend significant resources on maintaining legacy, underutilized copper-based networks, rather than expending that capital to build the high-speed broadband networks delivering services that consumers need and want. By any measure, consumer demand for legacy voice services has dropped precipitously over the last 20 years as Americans predominantly rely on wireless voice services.²⁴ Nevertheless, a subset of historically “incumbent” carriers remain subject to federal obligations that effectively force them to maintain their little used copper networks. The burdens of these regulations have long outweighed their benefits. The record in this proceeding provides strong support to permanently alleviate these burdens by streamlining the process for carriers to modernize their networks.

²² *FCC Cutting Red Tape to Unleash New Infrastructure Investments*, Press Release, Office of FCC Chairman Brendan Carr, Mar. 20, 2025, <https://docs.fcc.gov/public/attachments/DOC-410304A1.pdf>.

²³ See USTelecom Comments at 4-6; Verizon Comments 11-12; see also U.S. Chamber Comments at 20; TPA Comments at 1.

²⁴ See USTelecom Comments at 4-5.

V. Conclusion

TIA appreciates this opportunity to provide input on much-needed reform and streamlining of some of the Commission's more technical and antiquated rules and regulations.

TIA stands ready to assist the Commission as it continues its work on streamlining its requirements to the benefit of U.S. consumers and American goals and leadership.

By: /s/ Colin Andrews
Colin Black Andrews
Senior Director, Government Affairs

TELECOMMUNICATIONS INDUSTRY
ASSOCIATION
1201 Wilson Boulevard, Floor 25
Arlington, VA 22204

April 28, 2025