

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

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| In the Matter of |) | |
| |) | |
| Advancing IP Interconnection |) | WC Docket No. 25-304 |
| |) | |
| Accelerating Network Modernization |) | WC Docket No. 25-208 |
| |) | |
| Call Authentication Trust Anchor |) | WC Docket No. 17-97 |
| |) | |

COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION

I. INTRODUCTION

The Telecommunications Industry Association (“TIA”) values the opportunity to comment on this matter before the Federal Communications Commission (“Commission”). TIA appreciates the Commission’s effort to accelerate the transition of communications networks to all-Internet Protocol (“IP”) technology by examining its interconnection requirements. In a time of technological transformation, connectivity is the foundation upon which modern innovation is built. Interconnection connects voice networks and, ultimately, callers across the country.

TIA represents manufacturers and suppliers that are leading the way in innovation by bringing to market next-generation networks, products, and services.¹ These members are eager to provide the nuts and bolts of our all-IP future. The voice marketplace has transformed since the Telecommunications Act of 1996 (the “1996 Act”) was passed. Today, “there now exists a multitude of . . . voice service options for consumers in the United States,”² and most voice

¹ *About TIA*, TIA, <https://tiaonline.org/about/> (last visited Jan. 20, 2026). TIA is a U.S.-based trade association and standards development organization representing more than 400 trusted global manufacturers of telecommunications equipment and services.

² *Communications Marketplace Report*, 2024 Communications Marketplace Report, 39 FCC Rcd 14116, 14232 ¶ 154 (2024).

traffic is IP-based.³ TIA therefore applauds the Commission for acknowledging the need for change and exploring how it can refresh its voice interconnection approach to promote IP voice interconnection.⁴ Promoting investment in an all-IP future and sparing providers from purchasing scarce and outdated time-division multiplexing (“TDM”) equipment benefits all.⁵

As the NPRM highlights, it is essential to “reduce regulatory barriers that hinder the transition to all-IP networks by preventing much-needed investment in and deployment of next-generation networks.”⁶ The Commission has a vital role to play in facilitating the IP voice transition through pro-market reforms. Moving forward with modernizing the Commission’s voice interconnection approach is an important part of that broad mission. Facilitating IP voice interconnection by eliminating outdated TDM-focused requirements and developing a modern, IP-focused framework will promote investment in next-generation solutions, result in improved service, and be conducive to greater network efficiency.

II. THE COMMISSION SHOULD USE THIS PROCEEDING TO PROMOTE THE IP VOICE TRANSITION

The Commission’s overall goal should be to promote the transition to IP voice interconnection. As a trade association representing the manufacturers and suppliers of information and communications technology equipment, TIA and its members have a longstanding interest in policies that promote the deployment of secure, resilient, and innovative

³ *Advancing IP Interconnection; Accelerating Network Modernization; Call Authentication Trust Anchor*, Notice of Proposed Rulemaking, FCC 25-73, ¶ 1 (rel. Oct. 29, 2025) (“NPRM”).

⁴ *Id.* ¶ 3.

⁵ See Open Letter from Jonathan Spalter, President and CEO, USTelecom, to President Donald Trump & 119th Congress, at 2 (Jan. 2025), <https://ustelecom.org/wp-content/uploads/2025/01/Broadband-2025.pdf> (“As manufacturers stop producing outdated equipment, some network operators must resort to scouring eBay for parts.”).

⁶ NPRM ¶ 2.

communications networks, including IP voice networks.⁷ TIA concurs with the Commission that IP networks are resilient, flexible, and reliable, offering improved service quality and fewer outages compared to legacy platforms.⁸ As the Commission notes, IP voice also enables important consumer benefits, such as STIR/SHAKEN caller ID authentication.⁹ Additionally, the IP transition provides opportunities to improve the security of 911 networks by integrating robust cybersecurity features, such as encryption, software-based monitoring, automated threat detection, and rapid patching.¹⁰

The Commission should ensure that the steps it takes in this proceeding help to allow consumers and providers alike to enjoy the benefits of the IP transition. It should pursue an approach that leverages the capabilities of IP networks that were not available when the current interconnection framework was developed decades ago. VoIP network architecture is far more flexible than the rigid networks of the past.¹¹ The Commission should pursue an interconnection approach that accounts for modern network design flexibility rather than transpose an outdated, highly constrained model of how networks work.

⁷ *Resolve to be Resilient*, TIA, <https://tiaonline.org/resolve-to-be-resilient/> (last visited Jan. 20, 2026). Among other initiatives, TIA developed and administers SCS 9001, a comprehensive system for global supply chain security management. See Mike Regan, *TIA's SCS 9001 Cyber and Supply Chain Security Standard – Update*, TIA (Jan. 2023), <https://csrc.nist.gov/csrc/media/Presentations/2023/tia-quest-forum-scs-9001-update/images-media/Jan-24-2023-ssca-regan.pdf>.

⁸ NPRM ¶ 12.

⁹ *Id.* ¶ 14.

¹⁰ *Id.* ¶ 12.

¹¹ Compare, e.g., Network Performance Test Plan of AT&T, WC Docket No. 24-220, at 6 (July 19, 2024) (illustrating AT&T Phone-Advanced network architecture), with, e.g., Annabel Z. Dodd, *The Essential Guide to Telecommunications* 170-71 (2d ed. 2000) (explaining central office functions).

III. THE COMMISSION SHOULD SET ASIDE ITS OUTDATED INTERCONNECTION FRAMEWORK

TIA has long supported smart deregulatory measures¹² and supports the Commission’s exploration of how it can use deregulation here as part of its broader exploration of modernizing the voice regulatory ecosystem. As the NPRM notes, changes in the marketplace since the passage of the 1996 Act’s monopoly-ending provisions have reduced competing providers’ reliance on incumbent local exchange carriers (“ILECs”) in provisioning service to their customers.¹³ For example, when Congress passed the 1996 Act, ILECs controlled 99.7% of the local telephone service market, while today ILEC switched access lines account for less than 3.2% of the voice telephony marketplace.¹⁴ TIA specifically supports the proposal to relieve ILECs of outdated interconnection requirements that lock in legacy technology and are based on the monopoly voice environment of the distant past.¹⁵ Making interconnection available “at any technically feasible point” is not necessary, efficient, or sensible given the flexibility of IP voice networks.¹⁶

Regulatory frameworks should evolve to ensure that providers can deploy innovative services efficiently while maintaining essential protections. It will be important for the Commission to develop an approach to IP voice interconnection that promotes market solutions, encourages ongoing investment, and limits regulatory intervention to what is necessary to

¹² *See, e.g.*, Comments of TIA, WT Docket Nos. 25-209 & 25-208, at 5, 7 (Sept. 29, 2025); Comments of TIA, GN Docket No. 25-133 (Apr. 11, 2025).

¹³ NPRM ¶ 34.

¹⁴ *Id.* ¶ 9.

¹⁵ *Id.* ¶ 3.

¹⁶ 47 U.S.C. § 251(c)(2)(B); NPRM ¶ 19.

promote those goals. Stakeholder input will be invaluable for the Commission to develop solutions that achieve transition goals and account for a variety of perspectives.

IV. CONCLUSION

TIA appreciates the Commission's thoughtful approach to voice interconnection modernization in this docket. Replacing outdated, rigid, legacy voice interconnection requirements with consensus-driven IP voice solutions will open market opportunities for technology suppliers and encourage the availability of flexible, resilient, and modern IP-based voice offerings.

Respectfully Submitted,

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