

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON D.C. 20554**

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

REPLY COMMENTS OF THE MICHIGAN PUBLIC SERVICE COMMISSION

On March 12, 2025, the Federal Communications Commission (FCC or Commission) issued a Public Notice in the above captioned proceeding. The Notice states that the FCC seeks comment from interested parties identifying FCC rules that should be eliminated or modified to remove unnecessary regulatory burdens and encourage network and infrastructure investment by firms subject to FCC regulation. Per the schedule established in the Public Notice, initial comments were due on April 11, 2025, and resulted in over 800 filings by interested individuals and organizations, with reply comments due on April 28, 2025. The Michigan Public Service Commission (MPSC) offers the following reply comments.

In its comments, the Colorado Public Utility Commission (COPUC) requests that in evaluating costs and benefits of rules for potential modification or elimination that the Commission “put a heavy weight on the benefits to the public of consumer protection, public safety, and accessibility.”¹ The COPUC suggests “a

¹ Comments of the Colorado Public Utility Commission p. 2.

“first do no harm” approach to consumer protection, public safety regulations, and accessibility, and to consider the broader benefits that such regulations may provide beyond a strict weighing of tangible costs and benefits.”² The MPSC agrees with the COPUC in requesting that the Commission carefully consider the benefits to the public beyond a strict tangible cost-benefit analysis. While the MPSC supports removing **unnecessary** regulatory burdens and improving efficiency, care should be taken to avoid unintended impacts to the public.

As previously stated, there were over 800 comment filings in this proceeding, and they propose a variety of changes to FCC rules. Due to the volume of filings and the fact that this is the initial step in any potential rule changes, the MPSC is not responding to any specific proposed rule change or elimination in these reply comments. This should not be interpreted to suggest that the MPSC either supports or opposes any particular changes to FCC rules. Instead, the MPSC will reserve potential comments on any specific changes for subsequent proceedings implementing any rule modifications or eliminations the Commission chooses to pursue.

The MPSC thanks the Commission for the opportunity to comment in this proceeding. The MPSC agrees that removing unnecessary regulatory burdens and encouraging investment in system modernization and innovation are worthwhile goals. Due to technological advancement, changes in the industry, or other factors, some rules may no longer be necessary. However, the MPSC urges the Commission

² *Id.*, pp. 2-3.

to consider carefully any impact on the public interest that the elimination or modification of any rule might have and to give careful consideration to the areas of public safety, accessibility, and consumer protection, as suggested by the COPUC in its initial comments. This approach will allow the Commission to remove regulations that may no longer be necessary and improve efficiency, while at the same time avoiding potential harms to the public.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**

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