

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Reducing Barriers to Network Improvements and)	WC Docket No. 25-209
Service Changes)	
)	
Accelerating Network Modernization)	WC Docket No. 25-208

REPLY COMMENTS OF THE MICHIGAN PUBLIC SERVICE COMMISSION

I. Introduction

On July 25, 2025, the Federal Communications Commission (FCC or Commission) released a Notice of Proposed Rulemaking (NPRM) seeking comment on deregulatory options to encourage providers to build, maintain, and upgrade their networks such that all consumers and businesses can benefit from technological strides in the communications marketplace, while safeguarding consumers' access to critical emergency services such as 911.¹ Per the schedule established in the Public Notice related to these proceedings released on August 28, 2025, comments were due on September 29, 2025 with reply comments due October 27, 2025.² However, due to the lapse in federal government funding and pursuant to the information provided in the FCC's September 30, 2025 Public Notice, the reply comment due date has been extended.³ The Michigan Public Service Commission

¹ Notice of Proposed Rulemaking, WC Docket Nos. 25-208 and 25-209, (July 25, 2025) [FCC-25-37A1.pdf](#)

² Public Notice, WC Docket Nos. 25-208 and 25-209, (August 28, 2025) [DA-25-768A1.pdf](#)

³ Public Notice, DA 25-922, (September 30, 2025) [DA-25-922](#)

(MPSC) respectfully submits these reply comments in regard to issues raised in the above captioned dockets.

While the MPSC limits its reply comments, silence on a particular issue should not be taken as agreement or acquiescence on that issue. The MPSC appreciates the opportunity to comment on the FCC's more detailed approach in looking at various situations and issues that are affected by a provider discontinuing service.

II. Discussion

The MPSC welcomes and supports opportunities for providers to further advance and modernize their networks. While the number of landline customers continues to decline as customers choose to migrate to alternative technologies for their communication needs, the MPSC agrees with NTCA – The Rural Broadband Association (NTCA) that “[t]he Commission must be careful, however, to distinguish between reforms that will remove burdensome and unnecessary regulatory red tape and changes that could inadvertently harm rural consumers, create regulatory uncertainty, or frustrate the mission of universal service.”⁴ The MPSC further supports the sentiments of Public Knowledge and the Communications Workers of America (PK/CWA) which notes that “the Commission must not abandon its central purpose, ensuring that all Americans remain connected to voice service, which continues to be the most important way to communicate with emergency services, and the primary means of communication for many elderly Americans, rural Americans, and other vulnerable populations.”⁵

⁴ Comments of NTCA – The Rural Broadband Association, WC Docket Nos. 25-208 and 25-209, (September 29, 2025) [NTCA Network Modernization 092925.pdf](#), p 2.

⁵ Comments of Public Knowledge and Communications Workers of America, WC Docket Nos. 25-208 and 25-209, (September 29, 2025) [PKCWA Transition Comments 9.29.25.docx](#), p 6.

Any alternative replacement technology must also be able to be compatible and support existing devices used with legacy time division multiplexing (TDM) technology such as alarm and security systems, devices for the hearing impaired, and fax machines to allow for a seamless transition. In their comments, the Accessibility Organizations raise the concern that “certain legacy relay options, namely TTY, and analog-based captioned telephone service (CTS), and speech-to-speech Relay (STS) are becoming obsolete without suitable replacements for individuals who still rely on TDM-based services.”⁶ The MPSC urges the Commission to ensure these issues are addressed so that no one loses critical access to telecommunications as a result of the transition to IP-based networks.

Additionally, alternative technologies that the FCC allows to replace TDM should continue to be reliable and support 9-1-1 with no coverage gaps during use, not just at the time an incumbent local exchange carrier may apply to discontinue service. Any federal standards allowing these legacy providers to discontinue TDM service should be robust and ensure that all customers continue to have reliable replacement options for voice service. These standards will likely require continued reporting to the FCC and further investment of the legacy carriers into new replacement technologies in the areas they continue to serve.

The FCC should also ensure that replacement voice services are available to all customers in an area and that coverage is resilient. This is especially important because the jurisdiction over the types of replacement services continues to be limited. State commissions, which are in the best position to be able to assist customers, may not have the

⁶ Comments of Communication Service for the Deaf, Deaf Equality, Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing, and TDIforAccess, Inc. (collectively, the Accessibility Organizations.) WC Docket Nos. 25-208 and 25-209, (September 29, 2025), <https://www.fcc.gov/ecfs/document/10930402911741/1>, p 2.

express authority to assist customers if there are service quality and accessibility issues with the replacement services.

The MPSC agrees with AARP in its support for comprehensive outreach and education by the FCC on consumer impact of transitions away from legacy copper services, and considers outreach and consumer education to be essential to minimize the potential for consumer harm during any transition.⁷ The MPSC also agrees with AARP that, “[s]ufficient time is critical to alert consumers to the potential discontinuance of service they may have relied on for decades; to enable consumers to navigate the process and to raise any questions and concerns; and to allow consumers adequate time to learn about alternative services offered in their area.”⁸ The allowance of a sufficient amount of time to transition to another provider is even more essential for ensuring that critical customers such as government institutions, schools, medical facilities, and large businesses with multi-line systems can successfully and seamlessly transition their oftentimes large and complicated telecommunications infrastructure systems to another service or provider.

Further, the FCC should consider that eliminating or reducing any notice requirements reduces transparency. If issues arise when providers and customers are unaware of an impending discontinuance affecting them, it could create a slowdown in the transition while matters are halted and resolved. In addition, the elimination of notice requirements can cause disruptions in communications that impact public safety. The Alarm Industry Communications Committee notes in its comments that the public safety benefits of monitored alarm systems depend on reliable alarm signaling connectivity, which can be compromised when alarm companies and their customers lack adequate notice of

⁷ Comments of AARP, WC Docket Nos. 25-208 and 25-209, (September 29, 2025) <https://www.fcc.gov/ecfs/document/10929206597247/1>, pp 7-8.

⁸ *Id.* at p 10.

telecommunications network changes.⁹ The FCC should take the potential impact to public safety into account as well when considering changes to the notice requirements.

Like other commenters in this proceeding, the MPSC also supports that any voice service replacement be offered to customers on a standalone basis. As NTCA notes, “the Commission must ensure in evaluating any service alternatives that consumers retain access specifically to standalone voice service and are not forced to purchase bundled broadband service simply to obtain and maintain access to voice communications. This is particularly critical for customers who may not need or want broadband service but require reliable voice service for emergency access. Any replacement service assessment under the consolidated rule must preserve the availability of standalone voice options at reasonable rates.”¹⁰

The MPSC believes that the FCC must also take wholesale network interconnection issues and technical arrangements into consideration when evaluating its discontinuance rules and policies. As stated by INCOMPAS in its comments addressing interconnection issues related to incumbent providers transitioning to IP based networks: “competitive carriers are being compelled to rely on legacy technologies that incumbents are abandoning, while being denied access to modern, scalable alternatives. The result is a forced dependence on overpriced deteriorating facilities that not only inhibit competition but threaten service continuity for mission-critical communications, including emergency 911

⁹ Comments of the Alarm Industry Communications Committee, WC Docket Nos. 25-208 and 25-209, (September 29, 2025) <https://www.fcc.gov/ecfs/document/10929981417935/1>, p 3.

¹⁰ Comments of NTCA – The Rural Broadband Association, WC Docket Nos. 25-208 and 25-209, (September 29, 2025) [NTCA Network Modernization 092925.pdf](#), p 6.

traffic.”¹¹ INCOMPAS goes on to recommend that the FCC “establish a clear, enforceable framework for IP interconnection that covers local exchange traffic and, in particular, public safety obligations.”¹² The MPSC agrees that the FCC should work with competitive providers to ensure they are able to continue providing service as incumbents switch to newer technology and urges the Commission to take these issues into consideration when deciding how to shape discontinuance policy so that the networks continue to run efficiently, safely, and that no customers lose service or are left behind as advancement to IP networks continue and incumbent local exchange carriers grandfather and discontinue legacy services offered to other telecommunications providers.

The MPSC supports a transparent process that continues to allow competitive local exchange carriers (CLECs) the opportunity to easily be able to receive network disclosure notifications that could potentially impact their networks and ability to provide critical services and the delivery of 9-1-1 calls. Those CLECs also should continue to have the ability to voice their concerns to the FCC and the MPSC supports the comments of PK/CWA in noting, “it is prudent for the Commission to take a more cautious approach in the midst of this generational transition in the industry to prevent unintended disruptions that might be caused because of such network changes.”¹³

¹¹ Comments of INCOMPAS, , WC Docket Nos. 25-208 and 25-209, (September 29, 2025), <https://www.fcc.gov/ecfs/document/1092970371624/1>, pp 4-5.

¹² *Id.* at p 5.

¹³ Comments of Public Knowledge and Communications Workers of America, WC Docket Nos. 25-208 and 25-209, (September 29, 2025) [PKCWA Transition Comments 9.29.25.docx](#), p 9.

III. Conclusion

Landlines over copper have been an effective tool for communication for well over 100 years, and while the MPSC recognizes that great advancements have been made and there are now more efficient technologies that allow customers to communicate, the FCC must carefully weigh and take into consideration both rural customers as well as older Americans and vulnerable populations in weighing and crafting policies for legacy providers to discontinue TDM service and allowing replacement with alternative services for voice communication. While many consumers and businesses have chosen to transition away from landline service, as of the most recent FCC Voice Telephone Services Report there are still over 18 million switched access lines in service in the United States, with over 350,000 of those lines being in the state of Michigan.¹⁴ Many of the areas where landlines are still commonly in use are rural areas where few competitive options exist and wireless service can be unreliable due to factors such as geography and weather. In allowing for the replacement of TDM service for other types of voice service, the FCC must ensure that call quality and reliability remain for all areas in which a legacy provider applies to discontinue service and that replacement services are compatible with existing TDM technology and devices.

The FCC also must ensure that as the transition to IP interconnection takes place, that it protect against unintended consequences of a discontinuance impacting CLECs or other retail providers of telecommunications service in order to adhere to rigid timelines or goals for providers that wish to retire their copper networks and facilities that CLECs depend on to provide service. In these matters, the MPSC also encourages providers to work together to resolve these issues and develop realistic timelines for network

¹⁴ [Voice Telephone Services Report](#), (last accessed 11/18/2025.)

transitions. The MPSC thanks the Commission for the opportunity to provide reply comments regarding this important proceeding.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION**

Steven D. Hughey (P32203)
Anna B. Stirling (P84919)
Assistant Attorneys General
Public Service Division
7109 W. Saginaw Hwy., 3rd Floor
Lansing, MI 48917
(517) 284-8140

DATED: November 18, 2025