

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

In the Matter of	)	
	)	
Reforming Legacy Rules for an All-IP Future	)	WC Docket No. 25-311
	)	
Accelerating Network Modernization	)	WC Docket No. 25-208

**COMMENTS OF THE  
MICHIGAN PUBLIC SERVICE COMMISSION**

On February 19, 2026, the Federal Communications Commission (FCC or Commission) released a Notice of Proposed Rulemaking (NPRM) in the above captioned proceedings to seek input on how to best ensure a smooth transition to all-IP networks for carriers that appropriately recognizes potential challenges and encourages investment in modern infrastructure.<sup>1</sup> Per the schedule established in the NPRM, initial comments are due May 26, 2026 and reply comments are due June 22, 2026.<sup>2</sup> The Michigan Public Service Commission (MPSC) offers the following comments. While the MPSC limits its comments in this filing, silence on a particular issue should not be interpreted as agreement or acquiescence on that issue.

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<sup>1</sup> FCC's February 19, 2026, NPRM, p 2, available at <https://docs.fcc.gov/public/attachments/FCC-26-11A1.pdf>.

<sup>2</sup> Federal Register April , 2026, Publication, available at [Federal Register :: Reforming Legacy Rules for an All-IP Future; Accelerating Network Modernization](#)

The MPSC comments to address the proposed preemption of state law in the furtherance of all-IP network deployment and infrastructure modernization. The Commission, in its Notice of Proposed Rulemaking has outlined that it “may preempt state law in certain circumstances, including where state regulation ‘negates a valid federal policy.’” Notice of Proposed Rulemaking, p 77 (internal citation omitted). The Commission further addresses that “[s]uch a conflict can arise when a law ‘stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress.’” *Id.* at 78.

The MPSC seeks to emphasize that, as stated in the Notice of Proposed Rulemaking, “the Supreme Court has found that the inquiry into whether state law poses an obstacle sufficient to allow preemption requires consideration of ‘the relationship between state and federal laws as they are interpreted and applied, not merely as they are written.’” *Id.* The MPSC does not seek to interfere with federal goals to create a uniform system of federal regulation but to emphasize the long-standing collaboration between the federal and state regulatory bodies and to urge the Commission to limit preemption to actual conflicts with federal law as opposed to wide-sweeping preemption of state authority.

Since the passage of the federal Telecommunications Act 30 years ago, states and the Commission have worked jointly to implement the goals of the Act. The continued collaboration of state and federal commissions allows state regulatory bodies to address issues unique to their states, maintain working relationships with smaller providers, and allow for the efficient use of federal resources.

State commissions like the MPSC are in an ideal position to understand the unique issues related to telecommunications within their state and have the expertise to address these issues while federal laws and rules address nationwide issues and set standards for state commissions to follow. This collaborative approach has allowed the Commission to focus on national issues and policy rather than having to directly address potentially differing issues in all 50 states, which would take up time and resources that could instead be focused on larger policy concerns. While modernizing the country's telecommunications network is a worthwhile goal, the MPSC urges the Commission to adopt policies that work collaboratively with state commissions rather than focusing on preemption when deciding how best to encourage providers to adopt new technology and maintain critical telecommunications services and necessary consumer protections. State commissions are also in the best position to be aware of the unique telecommunications landscape and the variety of providers that operate in their state and any potential problems that should be taken into account as part of the transition to an all-IP based network. If state law and regulations are universally preempted and this transition is done sweepingly at the federal level, there is a potential that local issues could be overlooked.

The MPSC has established working relationships with many of the telecommunications providers operating in Michigan, including smaller providers that may not have business before the Commission. These relationships allow the MPSC to work with providers to resolve disputes through informal discussion

without the time or expense of a formal proceeding. When a dispute does require formal proceedings, the MPSC is in the best position to adjudicate that dispute in a timely manner since its staff already has a thorough understanding of the telecommunications landscape in Michigan. Since the Commission has oversight of the entire United States, it is unrealistic to expect small single-state or regional providers to have that same working relationship with the Commission. As an example, if the Commission preempts the states from resolving provider-to-provider disputes that could come about as part of this transition to all-IP networks, resolutions may take more time and resources to be addressed by the Commission compared to if they are handled at the state level by the MPSC or its counterparts in each state.

End users have also benefited from the current collaborative approach. When customers have problems that they cannot resolve directly with their provider, they have the opportunity to come to the MPSC for assistance. The staff at the MPSC can then serve as the intermediary between the customer and the provider to resolve the issue. The MPSC staff knows the providers operating in Michigan and the unique challenges that may exist in serving particular areas of the state. This expertise is a useful tool in helping resolve any telecommunications issues that the customers in Michigan may have. The MPSC complaint staff has heard from customers who were frustrated when told that the issue they are having is one of federal jurisdiction and that they need to file a complaint with the Commission rather than being able to have it addressed at the state level.

The MPSC appreciates the opportunity to provide comments on this important issue and urges the Commission, as a policy, to work collaboratively with the states whenever possible rather than seeking to preempt state law. This collaborative partnership has allowed the Commission to focus on “big picture” issues that affect the entire country while state commissions can address specific matters in their states. Under this approach, the telecommunications network has advanced while vital customer protections and critical infrastructure have been maintained. While the Commission has vast expertise in many areas of telecommunications, it would not be an efficient use of its time and staffing resources to resolve issues from all 50 states when they could have been handled at the state level. Instead, the Commission should seek to continue the collaborative partnership with state commissions and even strengthen that partnership where possible. This will allow the Commission to utilize the expertise of the state commissions on the telecommunications landscape in their states while more efficiently using its resources to handle national policy. This approach has worked well since 1996 and can continue to serve the telecommunications providers and customers in Michigan and throughout the country.

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

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