



April 28, 2025

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, D.C. 20054

**In Re: Delete, Delete, Delete (GN Docket No. 25-133).**

Dear Ms. Dortch:

The U.S. Chamber of Commerce (“Chamber”) appreciates the Federal Communications Commission’s (“FCC” or “Commission”) *Public Notice* to alleviate “unnecessary regulatory burdens and facilitate network and infrastructure modernization and offering new and innovative services.”<sup>1</sup> The robust response to the *Public Notice* indicates a broad desire to right-size regulations in light of the present legal, marketplace, and technological realities. We encourage the Commission to move promptly to prioritize and pursue regulatory modernization.

In our earlier comments, the Chamber offered forty-two areas of regulatory reforms that broadly would modernize media and video regulations, ensure fairness and due process in enforcement, connect all Americans, rein in abuse of the Telephone Consumer Protection Act, reform the equipment authorization process, and unleash the space economy.<sup>2</sup> The record underscores significant support for these areas of reform.

Moreover, we offer several additional reforms for consideration that will allow the Commission to update regulations to fit the modern era, bolster the equipment authorization process, and strengthen the emerging space economy.

Finally, the Chamber respectfully requests the Commission refrain from pursuing changes to its digital discrimination rules until the Eighth Circuit Court of Appeals has completed its review. But we recommend that the Commission terminate the Further Notice of Proposed Rulemaking in this proceeding as it is beyond the Commission's authority, is

---

<sup>1</sup> *In Re: Delete, Delete, Delete*, Public Notice, GN Docket No. 25-133, at 1 (Mar. 12, 2025) (“Public Notice”).

<sup>2</sup> See Comments of the U.S. Chamber of Commerce et al., GN Docket No. 25-133 (filed April 11, 2025) (“Chamber Comments”).

unnecessary and contrary to marketplace facts, and would impose substantial costs and burdens on businesses without any corresponding consumer benefit.

## **I. The Record Reinforces that the Commission Should Prioritize These Areas for Reform.**

### *A. Modernizing Media and Video Regulations*

The media and video marketplaces have dramatically transformed over the last few decades due to the substantial technological changes brought by high-speed broadband internet. The Internet distribution of video, media, and audio content has been a boon to consumers, increasing choice, enabling the use of new and innovative technologies and business models, and expanding the ability for content creators to reach new customers and vice versa.

However, the Commission's legacy regulations on video and media have neglected to account for these technological and marketplace changes. The record underscores the widespread desire to modernize media and video regulations.<sup>3</sup> These include updating Cable Act regulations,<sup>4</sup> revising the Local Radio Ownership Rule,<sup>5</sup> consolidating burdensome broadcaster reporting obligations,<sup>6</sup> updating closed captioning requirements,<sup>7</sup> revisiting rules on navigation devices,<sup>8</sup> reversing all-in-pricing,<sup>9</sup> and repealing content-related programming obligations.<sup>10</sup>

### *B. Reducing Barriers to Connect All Americans*

Connecting all Americans to 21<sup>st</sup> century communications services should be a high priority of the Commission. Tailored and targeted regulatory obligations tied with smart permitting rules are essential to achieving this objective. Commenters widely recognized that the Commission must right-size existing regulatory obligations and avoid imposing new rules that would increase compliance costs that hinders capital investment and innovation. This

---

<sup>3</sup> Comments of NTCA – The Rural Broadband Association, GN Docket No. 25-133, at 4 (filed April 11, 2025) (“NTCA Comments”); Comments of the International Center of Law & Economics, GN Docket No. 25, at 8 (filed April 11, 2025) (“ICLE Comments”); *See generally*, Comments of the National Association of Broadcasters, GN Docket No. 25-133 (April 11, 2025) (“NAB Comments”).

<sup>4</sup> *See generally*, Comments of the NCTA – The Internet & Television Association, GN Docket No. 25-133 (filed April 11, 2025); Comments of the Free State Foundation, GN Docket No. 25-133, at 11 (filed April 11, 2025) (“FSF Comments”).

<sup>5</sup> NAB Comments at 10; Comments of the U.S. Small Business Association Office of Advocacy, GN Docket No. 25-133, at 6 (filed April 11, 2025) (“SBA Comments”).

<sup>6</sup> NAB Comments at 16; Comments of Sinclair, Inc., GN Docket No. 25-133, at 18 (filed April 11, 2025) (“Sinclair Comments”); SBA Comments at 6.

<sup>7</sup> Comments of ACA Connects, GN Docket No. 25-133, at 18 (April 11, 2025) (“ACA Connects Comments”).

<sup>8</sup> FSF Comments at 9; NCTA Comments at A-1.

<sup>9</sup> FSF Comments at 9; ACA Connects Comments at 10; NTCA Comments at 22; NCTA Comments at 11.

<sup>10</sup> NAB Comments at 44; Sinclair Comments at 16; SBA Comments at 8; NCTA Comments at 15.

includes closing rulemaking proceedings and repealing regulations pertaining to novel network security obligations,<sup>11</sup> usage-based pricing for broadband plans,<sup>12</sup> and outdated common carrier obligations.<sup>13</sup> The Commission should also focus on modifying existing regulatory requirements, such as streamlining consumer broadband labeling rules,<sup>14</sup> repealing expanded data breach requirements,<sup>15</sup> revising outage reporting rules,<sup>16</sup> and updating the broadband mapping process.<sup>17</sup>

Further, commenters underscored the need for smart permitting rules to build communications infrastructure.<sup>18</sup> For example, the Commission should provide permanent regulatory relief to modernize antiquated copper networks,<sup>19</sup> limit the scope of environmental and housing preservation review only to when the Commission plays a substantial oversight role,<sup>20</sup> and reform its submarine cable licensing rules to unlock additional private sector investment to strengthen resiliency and connectivity.<sup>21</sup>

### *C. Ensuring Fairness and Due Process in the Commission's Enforcement Proceedings.*

A fair and appropriate enforcement process is a cornerstone to all the Commission's regulatory responsibilities and objectives. Many commenters highlighted that a comprehensive review of the Commission's regulations should include a review of its enforcement practices.<sup>22</sup> The U.S. Supreme Court's decision in *SEC v. Jarkesy* raises a question if the Commission's pursuit of civil penalties in its in-house enforcement proceedings violates the Seventh Amendment's right to a jury trial.<sup>23</sup> Further, the Administration recently issued Executive Order 14219, *Directing the Repeal of Unlawful Regulations*, which directs agencies to focus on

---

<sup>11</sup> ACA Connects Comments at 7; NCTA Comments at 13; CCA at 19; SBA Comments at 14; Comments of CTIA, GN Docket No. 25-133, at A-13 (April 11, 2025) ("CTIA Comments").

<sup>12</sup> CTIA Comments at A-5; ICLE Comments at 21.

<sup>13</sup> NTCA Comments at 2; Comments of USTelecom – The Broadband Association, GN Docket No. 25-133, at 16 (April 11, 2025) ("USTelecom Comments").

<sup>14</sup> ACA Connects Comments at 11; CTIA Comments at A-4; NTCA Comments at 11; Comments of the Competitive Carriers Association, GN Docket No. 25-133, at 8 (April 11, 2025) ("CCA Comments"); USTelecom Comments at 8; Comments of WISPA – The Association for Broadband Without Boundaries, GN Docket No. 25-133, at 3 (April 11, 2025) ("WISPA Comments").

<sup>15</sup> ACA Connects Comments at 16; Comments of the Information Technology Industry Council, GN Docket No. 25-133, at 11 (April 11, 2025) ("ITI Comments"); NTCA Comments at 20; CCA Comments at 23; USTelecom Comments at 23; WISPA Comments at 5; CTIA Comments at A-17.

<sup>16</sup> ACA Connects Comments at 14; CCA Comments at 15; USTelecom Comments at 12.

<sup>17</sup> CTIA Comments at A-3; Comments of Verizon, GN Docket No. 25-133, at 12 (April 11, 2025) ("Verizon Comments"); Comments of INCOMPAS, GN Docket No. 25-133, at 10 (April 11, 2025) ("INCOMPAS Comments"); CCA Comments at 2; USTelecom Comments at 9.

<sup>18</sup> INCOMPAS Comments at 6; ICLE Comments at 18.

<sup>19</sup> USTelecom Comments at 3; Verizon Comments at 11.

<sup>20</sup> CTIA Comments at A-8; Verizon Comments at 13; CCA Comments at 10; SBA Comments at 12.

<sup>21</sup> *See generally*, Comments of the International Connectivity Coalition, GN Docket No. 25-133 (April 11, 2025).

<sup>22</sup> Comments of AT&T, GN Docket No. 25-133, at 16 (April 11, 2025); CTIA Comments at A-22; ICLE Comments at 17.

<sup>23</sup> Thomas M. Johnson, White Paper on FCC Enforcement Bureau Reform, Wiley (Jan. 29, 2024), <https://comms.wiley.law/8/5148/uploads/white-paper-on-fcc-enforcement-bureau-reform-01.29.2024-tj.pdf>.

repealing regulations that are inconsistent with recent U.S. Supreme Court decisions, including *SEC. v. Jarkesy*.

Multiple lawsuits testing the application of *Jarkesy* to the Commission's enforcement processes are ongoing.<sup>24</sup> On April 17<sup>th</sup>, the United States Court of Appeals for Fifth Circuit vacated the Commission's multi-million-dollar forfeiture order on AT&T on the basis that the Commission violated AT&T's constitutional right to a jury trial and an Article III decisionmaker.<sup>25</sup> This decision implicates not just AT&T, but other regulated parties subject to the Commission's in-house enforcement proceedings. Until legal clarity is provided by either the Congress or the courts, the Commission should pause the assessment of any forfeiture penalties that are inconsistent with the Fifth Circuit's decision.

#### *D. Reforming the Telephone Consumer Protection Act*

The Telephone Consumer Protection Act ("TCPA") is an important law to protect consumers from fraudulent robocallers and other bad actors. Unfortunately, the TCPA's expansive private right of action has also been a boon for the plaintiff's bar and serial plaintiffs, which has imposed substantial litigation and compliance costs on legitimate businesses while not effectively deterring bad actors. Commenters broadly agreed that the Commission should take action to clarify TCPA requirements.<sup>26</sup> This includes modifying the consent revocation rule, for which the Commission recently granted a one year stay of certain aspects of the rule in recognition of compliance burdens associated with the rule.<sup>27</sup> Further, many commenters echoed the need for a comprehensive review of TCPA regulations to provide clarity to regulated parties and increase compliance<sup>28</sup> as well as clarify that the TCPA does not cover text messaging.<sup>29</sup>

#### *E. Updating Equipment Authorization Rules*

The Commission is the single regulator of radio spectrum and utilizes an equipment authorization process to ensure all electronic devices comply with federal rules on electromagnetic interference. The record demonstrates that there is a broad desire for the

---

<sup>24</sup> AT&T Inc. v. FCC, No. 24-60223 (5th Cir. April 17, 2025); T-Mobile USA, Inc. v. FCC, No. 24-1225 (D.C. Cir. filed June 27, 2024); Verizon Comm'c v. FCC, No. 24-1733 (2nd Cir. filed June 28, 2024).

<sup>25</sup> AT&T Inc. v. FCC, No. 24-60223 (5th Cir. 2025).

<sup>26</sup> SBA Comments at 3; *See generally*, Comments of American Bankers Association et al., GN Docket No. 25-133 (April 11, 2025) ("American Bankers et al. Comments"); Comments of the National Association of Mutual Insurance Companies, GN Docket No. 25-133, at 3-6 (April 11, 2025).

<sup>27</sup> Comments of the National Association of Chain Drug Stores, GN Docket No. 25-133, at 1-2 (April 11, 2025); NCTA Comments at 13; American Bankers Association et. al Comments at 6; ITI Comments at 9; Comments of the National Association of Automobile Dealers, GN Docket No. 25-133, at 2 (April 11, 2025) ("NADA Comments"); ICLE Comments at 20; *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278, Order, DA 25-312 (Apr. 7, 2025).

<sup>28</sup> INCOMPAS Comments at 19.

<sup>29</sup> NADA Comments at 1.

Commission to reform its equipment authorization process and related requirements.<sup>30</sup> This includes addressing outdated labeling requirements,<sup>31</sup> device importation,<sup>32</sup> and equipment authorization regulatory guidance.<sup>33</sup> This will strengthen the consumer and electronic device industry and enable the industry to supply affordable devices to consumers faster.<sup>34</sup>

#### *F. Unleashing the Space Economy*

The space economy is expected to reach \$1 trillion by 2040 and, among other benefits, is foundational for core communications infrastructure as the Global Position System has substantial potential to help close the digital divide.<sup>35</sup> Commenters highlighted how the Commission can continue to reduce regulatory barriers to strengthen American leadership in outer space.<sup>36</sup> Notably, efficient interagency coordination between the Commission and other relevant federal agencies is critical to enable all space-related licensing activities and provide certainty and clarity for industry.<sup>37</sup> Further, many commenters noted that the Commission should review its approach to regulating orbital debris.<sup>38</sup>

## **II. The Commission Should Consider Additional Regulatory Reforms.**

### *A. Section 628(b) Reform*

The Cable Act prohibits a cable operator or a satellite broadcast programming vendor from engaging in unfair methods of competition or unfair or deceptive acts or practices with the goal of limiting video programming to consumers.<sup>39</sup> While the prohibition has worked to ensure consumers can access programming, the Commission has pursued an expansive interpretation of the provision beyond its initial purpose to justify restrictions on bulk-billing arrangements in condominiums and apartment buildings.<sup>40</sup> To maintain 628(b)'s initial intent, the Commission should eliminate the bulk billing rule and clarify the intent of the statute. This

---

<sup>30</sup> See generally, Comments of the Telecommunications Industry Association, GN Docket No. 25-133 (April 11, 2025) ("TIA Comments"); Comments of the Consumer Technology Association, GN Docket No. 25-133, at 1-3 (April 11, 2025) ("CTA Comments"); CTIA Comments at A-9.

<sup>31</sup> TIA Comments at 2; ITI Comments at 5; CTA Comments at 3.

<sup>32</sup> ITI Comments at 4; CTA Comments at 3.

<sup>33</sup> CTA Comments at 2.

<sup>34</sup> TIA Comments at 2.

<sup>35</sup> John Neal, *Exploring Economic Opportunity in Space*, U.S. CHAMBER OF COMM. (Sept. 6, 2023), <https://www.uschamber.com/space/economic-opportunity-in-space>.

<sup>36</sup> See generally, Comments of Capella Space Corp., GN Docket No. 25-133 (April 11, 2025) ("Capella Space Comments"); Comments of the Satellite Industry Association, GN Docket No. 25-133 (April 11, 2025) ("SIA Comments"); Comments of the Commercial Space Federation, GN Docket No. 25-133 (April 11, 2025) ("CSF Comments"); ICLE Comments at 15.

<sup>37</sup> Capella Space at 7-8; SIA Comments at 2-3; CSF Comments at 5.

<sup>38</sup> CSF Comments at 4.

<sup>39</sup> 47 U.S.C. § 548(b).

<sup>40</sup> 47 C.F.R., § 76.1001(b) (application to terrestrial programming) and § 76.2000(b) (application to MTE agreements).

will prevent regulatory overreach by future Commissions and provide clarity to regulated entities on their legal obligations under 628(b).<sup>41</sup>

### *B. Composite Systems Testing for Fixed Installations*

The Commission requires additional equipment authorization testing for composite systems, which is defined as a “system that incorporates different devices contained in a single enclosure or in separate enclosures connected by wire or cable.”<sup>42</sup> The Commission should eliminate the requirement for additional testing of composite systems when that system is part of a fixed installation. Each component of a composite system already undergoes an independent certification. Moreover, this requirement is particularly burdensome on large composite systems such as data centers, which are fixed and cannot be efficiently transported to an accredited laboratory.

### *C. Suppliers Declaration of Conformity*

As part of the equipment authorization process, the Commission requires a product to either adhere to the Suppliers Declaration of Conformity (“SDoC”) or Certification processes. The Commission should modernize its equipment authorization processes, which includes moving lower risk products exclusively to the process. The current processes are unclear, lack consistency, and subject some products to overlapping requirements with multiple parties.<sup>43</sup> This streamlining will enable the private sector to more expeditiously deploy products and provide consumers with more choice at a lower cost.

### *D. TCPA Wireless Exemption*

Last year, the Commission proposed a Further Notice of Proposed Rulemaking (“FNPRM”) that would apply TCPA requirements to robocalls and robotexts from wireless carriers.<sup>44</sup> The Commission’s 1992 TCPA Order exempted wireless carriers from TCPA requirements on the grounds that carriers should be able to communicate directly with their customers.<sup>45</sup> This was later codified by the Telephone Disclosure and Dispute Resolution Act.<sup>46</sup> Consequently, the Commission should close this FNPRM.

Wireless carriers have a special interest in contacting their customers about issues impacting their service. For example, carriers need to contact customers about a service-

---

<sup>41</sup> NCTA Comments at 10.

<sup>42</sup> 47 C.F.R. §§ 2.947 and 15.31(k).

<sup>43</sup> CTIA Comments at A-8.

<sup>44</sup> *In the Matter of Strengthening the Ability of Consumers To Stop Robocalls*, CG Docket No. 02-278, Report and Order and Further Notice of Proposed Rulemaking, FCC 24-24 (Mar. 5, 2024).

<sup>45</sup> *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 92-90, Report and Order, DA 92-443 (Sept. 19, 1992) (“1992 TCPA Order”).

<sup>46</sup> See Telephone Disclosure and Dispute Resolution Act, Pub. L. No. 102-556, 106 Stat 4181 (1992); 47 U.S.C. § 227(b)(2)(C).

impacting event or billing issues.<sup>47</sup> Moreover, some customers are only able to be contacted through their wireless device in the event they provide insufficient contact information. Further, the FNPRM underscores a broader tension within the TCPA in that it would inhibit the ability for a business to effectively communicate with consumers.

#### *E. Cable Attribution Rules*

The Commission subjects cable operators and certain programmers to program access and program carriage obligations, such as mandatory carriage and licensing requirements, if they own five percent or more in a cable programming network.<sup>48</sup>

The video marketplace is highly competitive, yet traditional MVPDs, including cable operators, are still subject to legacy regulations from decades ago related to programming they own, including through small minority passive investments. Also, the five percent threshold under the cable rules is defined broadly, including both voting and non-voting interests, and with no exceptions for minority interest holders or when a single majority shareholder is present or for insulated interests (i.e. interests that have no role in the management or key decisions of a cable network). Further, technological and marketplace changes have lessened the initial justification for these special restrictions on attribution adopted over three decades ago given the rise of internet video streaming services. Finally, the attribution rules were adopted when there was significant vertical integration between cable programming networks and cable operators. Today, the percentage of national cable programming networks in which cable operators have an ownership interest is at 5.8%, down from 9.1% in 2017 and dramatically less than the 52.8% reported in 1994.

Accordingly, the Commission should harmonize cable's program attribution requirements to mirror the more flexible attribution rules applicable to the broadcast industry, including by attributing only *voting* interests of 5% or more and applying the single majority shareholder and insulated limited partner exceptions.

#### *F. Review Uneven Space Satellite Licensing Requirements*

The Commission imposes numerous licensing regulations on space companies seeking to launch and operate satellites from the United States that are more stringent than our global competitors.<sup>49</sup> For example, some U.S. buildout milestones are more stringent than international standards.<sup>50</sup> The U.S. needs to strike a balance. In some cases, it should exercise leadership to bring international standards in line with U.S. policy. But in other cases, U.S. requirements are needlessly restrictive and disadvantage American companies or companies that seek licensing in the United States. These overly restrictive rules threaten America's

---

<sup>47</sup> CTIA Comments at A-21.

<sup>48</sup> 47 C.F.R. § 76.1300.

<sup>49</sup> CSF Comments at 3.

<sup>50</sup> 47 C.F.R. § 25.164; 47 C.F.R. 25.161(a)(2).

leadership in space innovation and deployment by penalizing U.S.-headquartered companies and licensees compared to foreign competitors who operate under more flexible regulatory regimes. Further, these rules create an adverse regulatory environment that discourages companies from seeking a U.S. license.

#### *G. Responsive Launch Missions*

National security programs are increasingly needing to launch space assets at short notice, known as responsive space missions. However, the Commission does not have an established process to expeditiously approve these missions if a commercial operator is involved. The Commission should set clear rules to treat responsive launch missions as federal uses and allocate the necessary spectrum on behalf of the government customer even if the requestor is a commercial operator. This will allow the federal government's commercial operator partners to quickly respond to the needs of federal national security agencies and bolster partnership between the public and private defense sectors.

#### *H. Commercial Remote Sensing Regulatory Affairs (CRSRA) Determination*

CRSRA is an office within the U.S. Department of Commerce's Office of Space Commerce that licenses commercial remote sensing. A license is not required for non-remote sensing activity. However, when a satellite operator applies for spectrum from the Commission, the Commission recommends that applicants provide a determination from National Oceanic and Atmospheric Administration ("NOAA") for the satellite to be licensed (either the NOAA Part 960 license or a waiver letter).<sup>51</sup> Although this is not a legal requirement, the existing licensee experience is that the Commission treats a determination from NOAA as a precondition for the grant of a Commission license. The Commission should not consider a NOAA license determination or a waiver to be a Commission requirement for receiving a Commission license. These are independent licensing determinations and should be maintained separately by the agency of jurisdiction. Moreover, it creates uncertainty for applicants considering this practice is not a legal requirement.

### **III. The Commission Should Refrain from Addressing the Existing Digital Discrimination Rules Until the Eighth Circuit Completes Its Review and Should Terminate the Related FNPRM.**

In November 2023, the Commission adopted the *Digital Discrimination Order*, which sought to address alleged "digital discrimination" in the broadband marketplace and to ensure equal access to broadband across income level, race, ethnicity, color, religion, and national

---

<sup>51</sup> See FCC Part 5 Experimental and Special Temporary Authority (STA) Space Station Application Checklist, <https://www.fcc.gov/space/part-5-experimental-and-special-temporary-authority-sta-space-station-application-checklist> (accessed April 23, 2025).

origin.<sup>52</sup> In the *Order*, the Commission embraced a legally questionable and onerous disparate impact standard, where a business can be held liable for legitimate business, pricing, and deployment decisions even if it did not intend to discriminate.<sup>53</sup> Moreover, the *Order* applies not just to broadband providers, but to any entity that affects access to broadband, which could include infrastructure companies, construction, and landlords.<sup>54</sup> In January 2024, the U.S. Chamber, the Texas Association of Business, and the Longview Chamber of Commerce filed a lawsuit against the *Order*.<sup>55</sup> The rule is currently under review before the Eighth Circuit Court of Appeals.

Many commenters proposed that the Commission eliminate these rules, underscoring the substantial adverse impact of the rule on legitimate business decisions, including small businesses.<sup>56</sup> While the Chamber agrees that the *Order* is both unlawful and harmful, we request that the Commission refrain from taking steps to revise or reverse the *Order* until the Eighth Circuit completes its review.

Some commenters also called for the Commission to close the digital discrimination further notice of proposed rulemaking ("FNPRM").<sup>57</sup> This FNPRM, which is not addressed in the pending court challenge, should be closed. The FNPRM is beyond the Commission's statutory authority, is unnecessary and contrary to marketplace facts, and would impose substantial costs and burdens on businesses without any corresponding consumer benefit.

#### IV. Conclusion

The Chamber appreciates the Commission's focus on modernizing its regulatory frameworks, and we look forward to working with the Commission to achieve this goal. For any questions, please reach out to me at [mfurlow@uschamber.com](mailto:mfurlow@uschamber.com).

Sincerely,



---

<sup>52</sup> *Implementing the Infrastructure Investment and Jobs Act: Prevention and Elimination of Digital Discrimination*, Report and Order and Further Notice of Proposed Rulemaking, GN Docket No. 22-69, 38 FCC Rcd 11440 (2023) ("Digital Discrimination Order:").

<sup>53</sup> Matt Furlow, *How the Biden Admin's Regulatory Overreach Impedes Internet for All*, U.S. CHAMBER OF COMM. (June 14, 2024), <https://www.uschamber.com/technology/broadband/how-the-fccs-regulatory-overreach-impedes-internet-for-all/>

<sup>54</sup> Digital Discrimination Order at 85.

<sup>55</sup> Petition for Review, Chamber of Comm. of the U.S. et al. v. FCC, No. 24-60048 (5th Cir. Jan. 31, 2024).

<sup>56</sup> NTCA comments at 8; ACA Connects Comments at 8; CCA Comments at 7; Comments of the National Multifamily Housing Council et al., GN Docket No. 25-133, at 16 (April 11, 2025); WISPA Comments at 4; SBA Comments at 11.

<sup>57</sup> NTCA Comments at 10.

Matt Furlow  
Senior Director and Policy Counsel  
U.S. Chamber of Commerce