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

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 INCOMPAS

INCOMPAS
Christopher L. Shipley
Executive Director of Public Policy
1100 G Street NW, Suite 800
Washington, DC 20005
cshipley@incompas.org

January 20, 2026

TABLE OF CONTENTS

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

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 INCOMPAS

INCOMPAS, by its undersigned counsel, hereby submits these comments in response to the Federal Communication Commission's ("Commission") *Notice of Proposed Rulemaking* ("*NPRM*" or "*Notice*") on accelerating the transition of communications networks to all Internet Protocol ("IP") technology and completing the technology transition.[1]

I. INTRODUCTION AND SUMMARY

INCOMPAS, the competitive communications and artificial intelligence infrastructure association, represents a broad coalition of competitive communications providers, broadband builders, and technology innovators committed to expanding access, innovation, and competition in American communications markets. Our members, which include competitive local exchange carriers ("CLECs"), voice over IP ("VoIP") providers, as well as fiber-based network operators that serve millions of customers across the United States, depend on reliable, nondiscriminatory interconnection and access to incumbent facilities to deliver voice services, enterprise connectivity, and public safety communications.

[1] *See Advancing IP Interconnection, Accelerating Network Modernization, Call Authentication Trust Anchor,* WC Docket Nos. 25-304, 25-208, 17-97, Notice of Proposed Rulemaking, FCC 25-73 (rel. Oct. 29, 2025) ("*NPRM*" or "*Notice*").

INCOMPAS supports the Commission's goal of modernizing legacy networks and accelerating the transition from time-division multiplexing ("TDM") to IP-based technologies. The benefits of IP networks, including improved call quality, network efficiency, enhanced security, and support for next-generation services, are well-established and our members have been industry leaders in deploying these technologies. INCOMPAS members were among the first in the industry to adopt all-IP networks and services and are actively working to enhance voice services and preserve public safety, like call attestation and seamless 911 connectivity, as the broader public switched telephone network ("PSTN") is now undergoing massive shifts toward all IP-interconnection.

However, forbearance from TDM interconnection obligations cannot precede the establishment of a workable, enforceable, and competitively neutral transition framework.[2] This proceeding raises fundamental questions about how best to complete the technology transition and update the Commission's rules in light of evolving market realities. INCOMPAS anticipates that the record in this proceeding will reveal a troubling disconnect: competitive providers overwhelmingly support IP interconnection and have made substantial investments in IP-capable infrastructure, yet incumbent local exchange carriers ("ILECs") continue to require competitors to rely on TDM-based trunk-side interconnection, including for mission-critical 911 services.[3] The majority of INCOMPAS members have deployed fiber-based networks and are ready to complete the transition to all-IP interconnection. However, based on geographic locations and

[2] *See NPRM* at para. 55 (seeking comment on the appropriate regulatory framework for interconnection for IP voice services).

[3] *See* Comments of INCOMPAS, WC Docket Nos. 25-209, 25-208, 3-6 (filed Sep. 29, 2025) (urging the Commission to address IP interconnection before eliminating legacy discontinuance and copper retirement rules).

operational needs, these providers necessarily rely on ILEC-provided collocation and interconnection arrangements, which may include both IP and TDM components depending on what the ILEC makes available. This reliance is not a matter of preference, but of practical necessity given continued ILEC controls over essential facilities.

Competitive providers that use collocation today typically have maintained those arrangements for many years, often decades, and continue to pay state-approved tariffed rates, including both recurring and non-recurring charges, to ILECs for the use of collocated space. These are not free riders seeking uncompensated access; they are customers paying for services under rates that state public utility commissions have found to be just and reasonable. The elimination of collocation rights would strand these long-standing, paid-for arrangements and the substantial network investments built around them.

Meanwhile, while ILECs are rapidly abandoning TDM for their own retail operations, they have not abandoned it completely and show very little genuine interest in doing so for wholesale interconnection. Major ILECs continue to provide connections to residential customers using both copper and fiber. ILECs maintain TDM infrastructure where it serves their business interests, yet simultaneously argue that competitive providers should be denied access to the same facilities. At the same time, ILECs continue to require competitors to rely on TDM-trunk side interconnection for mission-critical services like 911.

Perhaps most importantly, competitive providers have built networks and formulated business plans that rely on the use of collocation arrangements, continued availability of certain UNEs, and access to dark fiber based on the legal and regulatory structure established by the Telecommunications Act of 1996—a structure that has been in place for nearly 30 years. These business plans, network architectures, and capital investments cannot be unilaterally upended in

a matter of two years when there has been no commensurate development of reasonable and nondiscriminatory IP interconnection rules and regulations designed to enable competitive providers to transition their networks in an orderly fashion. The *Notice's* proposed December 31, 2028 forbearance date provides inadequate time for this transition, particularly given that ILECs have not offered viable IP alternatives

Absent adequate safeguards, the forbearance from sections 251(c)(2)[4] and (c)(6)[5] proposed by the Commission in the *Notice* would entrench incumbent control over interconnection arrangements, increase costs and operational risks for competitive providers, and threaten the reliability of public safety communications. These concerns are not theoretical—they are grounded in the real-world experiences of INCOMPAS members who have sought IP interconnection options for years, only to be told by ILECs that such arrangements are unavailable or economically infeasible.[6]

If the Commission proceeds with forbearance, any acceptable alternative framework must, at a minimum: (1) ensure that competitive providers are not compelled to remain on TDM

[4] 47 U.S.C. § 251(c)(2).

[5] 47 U.S.C. § 251(c)(6) (requiring ILECs to "provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier").

[6] *See*, *e.g.*, Letter of Tamar E. Finn, Counsel to Bandwidth Inc. and Bandwidth.com CLEC, LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 25-209, 25-208, 21-17, 17-144, 17-97, 13- 97, et al. (filed Sep. 18, 2025) ("Bandwidth *Ex Parte* Letter") (explaining that ILECs have not offered INCOMPAS member Bandwidth "a method of interconnection that permits Bandwidth to bring newly deployed Ethernet transport facilities to interconnect with a tandem to (1) exchange traffic from/to the ILEC's TDM customers or (2) deliver 911 traffic to a selective router").

while ILECs migrate their own networks to IP; (2) preserve meaningful interconnection protections during and after the transition in accordance with section 251(c);[7] and (3) maintain existing collocation arrangements of competitive providers in incumbent facilities to effectuate IP interconnection.[8] These requirements are essential to avoid the IP interconnection transition from becoming a vehicle for ILECs to eliminate competition and increase costs for end users.

II. COMPETITIVE VOICE SERVICE PROVIDERS ARE LEADERS IN THE TRANSITION TO IP NETWORKS

A. The Current State of Interconnection for Competitive Voice Service Providers

INCOMPAS members have been deploying IP-based voice networks for decades and are fully supportive of moving to IP-based interconnection and traffic exchange. Our competitive voice service providers have made substantial investments in IP-capable switching equipment, Ethernet transport facilities, and IP-ready collocation arrangements. However, INCOMPAS members typically maintain a hybrid network that deploys VoIP-to-TDM and TDM-to-VoIP gateways that sometimes still rely on unbundled network element ("UNE") interoffice dark fiber routes. Often within these networks, providers collocate equipment in the incumbent's facilities enabling TDM and IP interconnection and transport of traffic to and from the network. These investments demonstrate our members' commitment to network modernization and their readiness to complete the IP transition. Despite these investments and their strong preference for IP interconnection, the majority of remaining TDM voice traffic flows through indirect interconnection arrangements at TDM tandems controlled by large ILECs.

[7] 47 U.S.C. § 251(c)(2).

[8] 47 U.S.C. § 251(c)(6).

At the same time, INCOMPAS members consistently report that ILECs: (1) continue to require DS1/DS3-based interconnection using outdated TDM protocols; (2) decline to offer Ethernet-based alternatives to tandems or selective routers; and (3) refuse to migrate trunk-side interconnection to IP even where technically feasible.[9] Direct connections among competitive or rural providers can still present challenges, while direct IP-based arrangements with ILECs are very rare. Among other issues, these dynamics continue to cause what industry participants have termed the "TDM-in-the-middle problem," where even fully IP-capable networks must convert their traffic to TDM to traverse ILEC networks, only to convert it back to IP on the other side.

This dynamic is particularly troubling because competition at the retail level, and the declining market share of large ILECs in retail voice services, has no bearing on the importance of these tandem-based arrangements to rural and competitive providers. ILECs continue to control critical chokepoints in the network infrastructure that competitive providers must access to serve their customers. The Commission's retail market share data, while relevant to some regulatory questions, obscures the persistent bottleneck power that ILECs exercise over wholesale interconnection.

Moreover, replacing the existing tandem arrangements will be a major undertaking that could be highly disruptive to voice callers—including during the critical transition to Next Generation 911 ("NG911")—if not carried out with the utmost care. INCOMPAS posits that this will necessitate the inclusion of explicit safeguards to prevent unreasonable requirements by incumbents. In contrast with their frequent public statements about copper loop retirement timelines and costs, large ILECs have provided little public information about plans to retire TDM tandems or the cost and timing of successor IP-based arrangements. This information

[9] *Ibid*, n. 6.

asymmetry places competitive providers at a severe disadvantage with critical business planning and their own network evolution.

B. Business Interests Are Responsible for the Persistence of TDM, Not Section 251(c)(2) Interconnection Obligations

According to members, the *Notice* misses the mark in attributing delays in achieving IP interconnection and traffic exchange to the existence of Section 251(c) interconnection obligations under the Telecommunications Act of 1996.[10] The consistent and longstanding experience of INCOMPAS members is that large ILECs have made business decisions not to facilitate IP-based arrangements, regardless of the regulatory framework. Furthermore, contrary to suggestions in the *NPRM*, large ILECs are not incurring meaningful capital expenditures for TDM-based interconnection arrangements and are fully compensated at rates for operational costs at highly-inflated business data services ("BDS") rates.[11] The existing TDM infrastructure has long been fully depreciated, and ILECs continue to generate substantial revenues from these legacy arrangements which the ILECs have allowed to be in place for decades without significant requests to increase those rates. There is simply no economic incentive for ILECs to voluntarily migrate to IP-based interconnection when they can continue to extract monopoly rents from TDM facilities.

[10] 47 U.S.C. § 251(c)(2) (requiring ILECs to "provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier's network . . . for the transmission and routing of telephone exchange service and exchange access").

[11] Following deregulation of these services, published BDS rates have climbed precipitously over the last five years. According to publicly filed tariff information, in January 2020, AT&T charged an average rate of $508 for Mux services and $74 for a T-1 connection. Those prices increased to $34,166 and $13,513 respectively in December 2025. Frontier's price increases were even more dramatic with average rates of $684 for Mux services and $255 for T-1 connections in January 2020 and $162,889 and $51,145 respectively in December 2025.

Tellingly, large ILECs have not suggested, let alone committed, that they would facilitate IP interconnection arrangements if Section 251 interconnection requirements were eliminated. If ILECs actually wanted these arrangements to happen, competitive providers would not have spent the last decade pressuring them to offer IP alternatives—ILECs would be pressuring competitors to migrate. The absence of any such ILEC initiative reveals their true motivations.

Premature forbearance without adequate safeguards will likely lead to dropped calls, including calls to 911, and significant increases in the prices of existing arrangements[12]—if the ILEC agrees to continue them at all. This would provide large ILECs with an unwarranted windfall for their failure to invest in IP-based arrangements and would punish the competitive providers that have already made those investments in good faith.

C. IP Interconnection Is Technically Feasible and Operationally Mature

The Commission must establish a clear, enforceable framework for IP interconnection that covers numbered voice services and, in particular, public safety traffic. IP interconnection is technically feasible. IP-based solutions to replace TDM tandems have been known to the Commission since 2022. Working from a recommendation to the North American Numbering Council,[13] INCOMPAS joined an effort with other leading trade associations (collectively, the SIP Interconnection Working Group) to identify "options that all voice service providers can use

[12] Existing arrangements will be priced on a commercial basis, and given the negotiating leverage that ILECs maintain, prices will be set by incumbents with little to no ability for competitors to negotiate, terms, conditions, or rates.

[13] *See* CALL AUTHENTICATION TRUST ANCHOR WORKING GROUP, NORTH AMERICAN NUMBERING COUNCIL, FCC, DEPLOYMENT OF STIR/SHAKEN BY SMALL VOICE SERVICE PROVIDERS (2021), *available at* https://nancchair.org/docs/October_13_2021_CATA_Working_Group_Report_to_NANC.pdf (recommending that the Commission permit industry to develop and propose a solution to the SIP interconnection problem within 6-12 months of the date of the report.)

to exchange voice traffic in IP, the cost and security considerations of each, as well as expectations for voice providers as they negotiate interconnection agreements."[14] This effort was undertaken to encourage and advance deployment of the STIR/SHAKEN call authentication framework by all voice service providers—another area where voice service providers have made a considerable investment and which requires IP interconnection to be fully effective. The SIP Interconnection Working Group submitted that providers interested in exchanging [Internet Protocol Voice Service] ("IPVS") traffic in a manner consistent with the STIR/SHAKEN framework could exchange traffic: (1) via dedicated connection, (2) over the Internet, or (3) via third party transport provider, depending upon factors such as volumes of traffic and geographic location of interconnection equipment. Additionally, the Working Group agreed to a series of market-based expectations for IPVS providers, including that all providers should be expected to negotiate the terms and conditions of an IP interconnection agreement in good faith, while retaining discretion not to negotiate with providers actively engaged in illegal behavior.

Unfortunately, expectations that all providers negotiate agreements in good faith have not materialized. This agreement and expectation was an important step in addressing this longstanding IP interconnection hurdle in order to maximize the effectiveness of the STIR/SHAKEN framework. Consequently, in many situations, the problem of TDM-in-the-middle persists today. As the Commission plans the IP transition, it should closely monitor the current state of IP interconnection and insist that all providers negotiate interconnection agreements in accordance with the solutions and expectations included in the Report.

[14] Letter of SIP Interconnection Working Group Co-Chairs to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97 (filed Nov. 16, 2022).

These industry efforts were undertaken specifically to: (1) eliminate the TDM-in-the-middle problems; (2) enable end-to-end IP call flows; (3) reduce operational complexity and costs; and (4) support enhanced services such as high-definition voice and real-time text for accessibility. The technical standards and operational best practices for IP interconnection are well-established and have been successfully deployed in commercial settings both domestically and internationally.

The persistence of TDM interconnection is therefore not a technical problem—it is a business and regulatory problem. The technology exists, the standards are mature, and competitive providers are ready and willing to implement IP-based solutions. Carriers have every incentive to migrate when provided a viable, nondiscriminatory path to do so. However, in the absence of a new clear interoperability framework and during the transition to a new future state, the Commission must retain and enforce safeguards that prevent ILECs from unilaterally dismantling the trunk-side infrastructure upon which competitive providers and the public still rely. What is missing is a framework that requires ILECs to make these options available on reasonable and nondiscriminatory terms.

III. INCUMBENT RELUCTANCE TO FACILITATE IP INTERCONNECTION THREATENS PUBLIC SAFETY, ROBOCALL MITIGATION EFFORTS, AND COMPETITION

The competitive voice service industry initially expected that providers would negotiate IP interconnection agreements in good faith, relying on commercial incentives and market forces to drive the transition. This expectation has not been realized. According to our members, many ILECs have declined to negotiate IP interconnection, have used their control over legacy facilities as leverage in negotiations, or have delayed migration without technical justification.

As a result, competitive providers find themselves trapped between sunsetting TDM rules and the absence of a reliable IP alternative. ILECs are retiring TDM infrastructure for their own operations while simultaneously refusing to provide IP interconnection options to competitors. This creates an untenable situation where competitive providers must either maintain expensive legacy equipment or face the prospect of being unable to complete calls at all. Without Commission intervention to establish a mandatory IP interconnection framework, critical services including 911, STIR/SHAKEN caller ID authentication, and caller identity information solutions, such as the IP-enabled Rich Call Data ("RCD") standard, will face severe disruption.[15]

A. 911 and NG911 Services Face Immediate Threats and Interruption

The proposed forbearance, absent a concomitant mandate for IP interconnection, creates an unacceptable risk to both traditional 911 ecosystems as well as NG911 services. Successful E911 call delivery remains heavily dependent on trunk-side interconnection to selective routers and Public Safety Answering Points ("PSAPs"). In legacy 911 networks and many transitional NG911 networks, selective routers receive 911 calls from various voice service providers and forward those calls to the particular PSAP that serves the caller's geographic area. If competitive

[15] Letter of INCOMPAS, NTCA—The Rural Broadband Association, the Cloud Communications Alliance, and the Voice on the Net Coalition, CG Docket No. 17-59, WC Docket No. 17-97 (fil. Feb. 13, 2024) ("Joint Association IP Interconnection Letter"). In February, INCOMPAS joined the Cloud Communications Alliance, the Voice on the Net Coalition, and NTCA—The Rural Broadband Association calling for the Commission to address the lack of an IP interconnection framework. The joint associations noted that "[w]ithout a framework, providers are not incented to exchange voice traffic in IP, undermining the robustness and security of our telecommunications infrastructure. Several critical developments, including the implementation of STIR/SHAKEN and other forthcoming caller ID authentication initiatives, have been, and will continue to be, impeded without ubiquitous IP interconnection." INCOMPAS urges the Commission to "proactively examine and endorse measures that promote IP interconnection."

providers lose the ability to interconnect with these selective routers, E911 calls will fail to reach PSAPs.[16]

The timing of the proposed forbearance in the *Notice* is particularly problematic given the measured pace of NG911 deployment. According to a 2024 report to Congress, only seven states are in the "jurisdictional end" of NG911 deployment, meaning that all PSAPs in the state are using the emergency services IP network ("ESINet") and all traffic has been transformed to IP. Twenty-three states are in either the "intermediate" or "transitional" stages in which the ESINet has been implemented and some portion of call modification has begun. Meanwhile, 15 states are in either the "legacy" stage in which no change or progress to NG911 has been made or the "foundational" stage in which the state has begun the procurement process for NG911 components..[17] This means that a material portion of PSAPs still depend on legacy 911 infrastructure.[18] Yet the Commission proposes forbearance from TDM interconnection

[16] The Commission has repeatedly emphasized that 911 reliability is paramount. *See, e.g., 911 Reliability*, FCC, https://www.fcc.gov/911-reliability (last visited Jan. 20, 2026) (indicating that ensuring that the public can always reach 911 is a top priority and reporting that the Commission's rules require "communications service providers to complete 911 calls, notify 911 call centers of outages, and certify that they are taking certain reliability measures"); *Facilitating Implementation of Next Generation 911 Services (NG911)*; *Location-Based Routing for Wireless 911 Calls*, PS Docket Nos. 21–479, 18–64, Report and Order FCC 24–78 (2024) ("PS Docket Nos. 21–479, 18–64; FCC 24– 78 ("*NG911 Report and Order*") ("The rules are intended to expedite the NG911 transition and help ensure that the nation's 911 system functions effectively and reliably, with advanced capabilities.").

[17] *See* CONGRESSIONAL RESEARCH SERVICE, R48015, FUNDING THE TRANSITION TO NEXT GENERATION 911 (NG911): CONSIDERATION FOR CONGRESS (2024), *available at* https://www.congress.gov/crs-product/R48015#:~:text=9,.%2214%20See%20Figure%202.

[18] *See* Comments By NENA: The 9-1-1 Association, WC Docket No. 25-304, et al., 1-2 (filed Dec. 18, 2025) (reiterating concerns on rapid decommissioning of TDM services that many PSAPs still depend on and suggesting that any transition order must accommodate the five-year purchasing schedule for infrastructure upgrades on which many local and state governments rely).

obligations with a December 31, 2028 sunset date, creating a dangerous gap between the elimination of legacy interconnection protections and the completion of NG911 deployment.

The premature elimination of TDM interconnection obligations increases failure risk, limits redundancy and resiliency, and creates unacceptable exposure for mission-critical emergency services. If ILECs are permitted to retire TDM facilities without providing equivalent IP interconnection, competitive providers will have no path to deliver 911 calls to the PSAPs that have not yet transitioned to NG911. The consequences could be catastrophic, including emergency calls that never reach dispatchers, victims unable to summon help, and preventable loss of life.

Any transition framework that jeopardizes 911 reliability is fundamentally flawed and must be reconsidered. Without mandatory IP interconnection requirements, there is no guarantee that ILECs will offer IP interconnection for 911 traffic delivery before every PSAP transitions to NG911. The Commission cannot simply hope that ILECs will act responsibly as history has shown that they will not provide IP interconnection voluntarily when they can profit from maintaining control over legacy facilities.

Moreover, any transition framework that fails to establish clear obligations to exchange voice calls under IP interconnection threatens to undermine the fundamental principle of the PSTN: that every caller can reach every other caller connected to the network. If there are no rules of the road governing IP interconnection, voice calls will fail, making prior rural call completion failures look minor in comparison.[19] The stakes are even higher for 911 calls, where call completion failures can mean the difference between life and death.

[19] *See, e.g. Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154 (2013) (finding that intermediate providers were failing to complete calls to rural areas, causing severe call completion problems).

B. NG911 Interconnection Presents Additional Competitive Concerns

Even where NG911 infrastructure *is* being deployed, INCOMPAS members face troubling interconnection requirements imposed by ILECs. Large ILECs are demanding that competitive providers use interconnection circuits that can only be purchased from the ILEC itself for interconnection to the NG911 network. These arrangements give ILECs a monopoly chokepoint where they can charge whatever they want, as competitive providers have no alternative options available.

This problem is compounded by recent changes to cost recovery mechanisms for NG911. Under the old TDM interconnection model for 911 selective routers, state and local 911 authorities often reimbursed competitive carriers for the cost of dedicated trunks used to connect to the selective router.[20] However, under many NG911 deployments, this reimbursement has been eliminated and competitive providers are susceptible to ILECs' non-competitive rates for interconnection without any offsetting reductions.

Given the potential threat to public safety, this arrangement is unjust and unreasonable. Competitive providers are being forced to pay monopoly rates to ILECs for circuits that are essential to providing critical public safety services, while simultaneously collecting and remitting 911 surcharges that were historically intended to cover these costs. ILECs are effectively double-dipping—collecting monopoly rents from competitive carriers while those

[20] Under legacy TDM 911 systems, state and local 911 authorities often reimbursed carriers for the cost of dedicated trunks connecting to selective routers. This reimbursement model is being eliminated in many NG911 deployments, requiring competitive carriers to bear the full cost of ILEC-provided interconnection facilities. *See NG911 Report and Order* at para. 145.

same carriers fund 911 infrastructure through surcharges. The Commission must address this issue as part of any IP interconnection framework.

C. Alarm Monitoring Services Depend on Reliable Interconnection

Alarm monitoring companies provide critical public safety services by monitoring security systems, fire alarms, and medical alert devices in homes and businesses. These companies rely on ILEC tandems for call routing from customer premises to their central monitoring stations. If ILECs discontinue TDM interconnection services without providing equivalent IP alternatives, alarm signals may fail to transit from customer premises through the network to monitoring centers.

The lack of a clear IP interconnection framework means there is no guaranteed path for alarm communications in an IP environment. Alarm monitoring companies, like competitive voice providers, have sought to negotiate IP interconnection with ILECs but have been met with refusals or economically unreasonable terms. Without Commission action to mandate IP interconnection, the transition away from TDM could leave millions of homes and businesses without functioning alarm monitoring, creating severe public safety risks.

D. STIR/SHAKEN Efficacy Is Undermined by TDM Networks

The STIR/SHAKEN caller ID authentication framework represents a major step forward in combating illegal robocalls and caller ID spoofing.[21] However, STIR/SHAKEN can only function effectively in end-to-end IP networks. When calls traverse TDM networks—which remains common due to ILECs' refusal to provide IP interconnection—the digital signatures that

[21] *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a)— Knowledge of Customers by Entities with Access to Numbering Resources,* WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3263, paras. 47-48 (2020).

authenticate caller identity are stripped from the call, rendering STIR/SHAKEN protections useless.

The data demonstrates the severity of this problem. According to analysis by TransNexus cited in joint comments filed by INCOMPAS and the Cloud Communications Alliance, only 38.8% of signed calls arrive at terminating providers with SHAKEN information intact as of October 2025.[22] This represents minimal improvement from 24% in 2022, demonstrating that TDM networks in the call chain continue to strip authentication information at unacceptably high rates.

The primary cause of this authentication failure is persistent TDM interconnection. When an originating carrier signs a call using STIR/SHAKEN in its IP network, but that call must then traverse an ILEC's TDM tandem to reach the terminating carrier, the SHAKEN signature is lost. The terminating carrier receives an unsigned call and has no way to verify the caller's identity. This creates a significant competitive disadvantage for smaller carriers who must rely on ILEC tandems, while larger carriers with end-to-end IP networks can successfully convey SHAKEN information.[23]

Without closing this IP/TDM gap, the Commission's efforts to enhance caller ID verification and combat robocalls will remain incomplete. Consumers will continue to receive calls without authentication, undermining trust in the calling system. Worse for the public, bad

---

[22] *See* Joint Comments of INCOMPAS and Cloud Communications Alliance, *STIR/SHAKEN Triennial Review*, WC Docket No. 17-97, at 12-15 (filed Nov. 18. 2025) ("INCOMPAS-Alliance Comments") (citing TransNexus data showing only 38.8% of signed calls arrive at terminating providers with SHAKEN information intact).

[23] 47 C.F.R. § 64.6301 *et seq.* (STIR/SHAKEN implementation rules). The Commission's rules require voice service providers to implement STIR/SHAKEN in their IP networks, but cannot prevent the stripping of authentication when calls traverse TDM facilities controlled by ILECs.

actors will continue to exploit the gaps in STIR/SHAKEN deployment to perpetrate fraud and harassment. The only solution is to mandate IP interconnection so that calls can remain in IP format throughout their journey across the network.

E. Rich Call Data and Caller Identity Solutions Require IP Interconnection

The Commission has initiated proceedings to explore RCD and enhanced caller identity information as tools to restore trust in voice calling.[24] These technologies allow originating carriers to include verified information about the caller, such as business name, reason for calling, and even logos, that display on the recipient's phone. RCD has significant potential to reduce consumer confusion, enable consumers to make informed decisions about which calls to answer, restore confidence in the PSTN, and support legitimate businesses in reaching their customers.[25] However, RCD, which is an IP-enabled standard, can only function in IP networks. Like STIR/SHAKEN, RCD depends on the ability to pass structured data along with the voice call itself. This requires end-to-end IP connectivity and cannot work when calls must traverse TDM facilities that strip all data except basic signaling information.[26]

---

[24] *See Advanced Methods to Target and Eliminate Unlawful Robocalls*, Fifth Report and Order, Third Further Notice of Proposed Rulemaking, and Second Declaratory Ruling, 38 FCC Rcd 1821 (2023) (seeking comment on Rich Call Data and caller ID authentication frameworks).

[25] *See* INCOMPAS-Alliance Comments at 6-7 (urging the Commission to support non-proprietary RCD solutions in order to better facilitate caller ID authentication and further the goals of the TRACED Act).

[26] *Signature-based Handling of Asserted Information Using toKENS (SHAKEN): Calling Name and Rich Call Data Handling Procedures*, ATIS-100094.2, April 30, 2025 ("This specification expands the SHAKEN framework, introducing mechanisms for authentication, verification, and transport of calling name as well as other enhanced caller identity information (*e.g.*, images, logos) and call reason, and describes how they are handled in various call origination and termination scenarios.").

INCOMPAS urges the Commission to adopt an appropriate regulatory framework for IP interconnection that will facilitate caller identity information verification and transmission. With this framework in place, RCD can be made available under protocols based on non-proprietary standards that will be honored across the network regardless of the provider. Once IP interconnection is assured, industry can put in place a caller presentation framework that (1) leverages STIR/SHAKEN protocols to enable and accelerate RCD deployment, (2) mandates that all voice providers operating IP networks must be capable of accepting and passing RCD, and (3) requires interoperability. Any proprietary solutions for RCD must be interoperable with STIR/SHAKEN protocols so that the standard is honored and available across the entire network, regardless of which carriers or platforms are involved. Without this interoperability requirement, RCD could become fragmented, with different walled gardens of caller identity information that do not communicate with each other.

None of this is possible without universal IP interconnection. If ILECs continue to require TDM interconnection for their tandem services, RCD will fail for the majority of voice calls, just as STIR/SHAKEN authentication fails today. The Commission must therefore make IP interconnection mandatory as part of any framework for caller identity information and RCD.

F. An IP Interconnection Mandate Is Necessary to Preserve Competition

As the Commission considers its forbearance proposals, the agency should note that the current transition environment creates severe competitive imbalances. Competitive providers are being compelled to rely on TDM facilities that incumbents no longer use for their own services. These facilities are increasingly scarce, increasingly expensive, and often available only from the incumbent ILEC itself. This is not a natural market outcome, but rather the result of ILEC control over essential interconnection and collocation facilities.

In order to be successful, the Commission must recognize that the success of the technology transition depends not only on the loop side of the network, but also on reliable, nondiscriminatory trunk-side interconnection. Competitive providers continue to rely on ILEC-controlled facilities for tandem and end-office interconnection, selective router access, and transport and routing of 911 calls. If ILECs are permitted to retire legacy facilities unilaterally, dictate interconnection technologies, or withdraw access without providing adequate IP alternatives, the transition will fail and competition will be eliminated.

For all these reasons—protecting 911 and public safety services, enabling STIR/SHAKEN and RCD to function effectively, and preserving competition—the Commission must mandate IP interconnection as part of any forbearance from legacy TDM obligations. The alternative is a fragmented, unreliable communications network that fails consumers, endangers public safety, and eliminates competition.

IV. COLLOCATION REQUIREMENTS UNDER SECTION 251(c)(6) PROTECT COMPETITION, PUBLIC SAFETY, AND INFRASTRUCTURE INVESTMENTS

The Commission's proposal to partially forbear from Section 251(c)(6) collocation requirements "to the extent that it obligates collocation of interconnection equipment" raises particularly acute concerns for INCOMPAS members.[27] Collocation rights have been a cornerstone of telecommunications competition for nearly three decades, enabling competitive providers to establish a physical presence in ILEC facilities to interconnect their networks efficiently and cost-effectively.[28] Forbearance from these obligations, particularly to the extent

[27] *See Notice* at para. 16.

[28] *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, First Report and Order, 11 FCC Rcd 15499, 15759 at para. 636 (1996) ("*Local Competition Order*") (establishing physical collocation as the preferred method for interconnection because it

that the proposals would interrupt current collocation arrangements, would have devastating consequences for competition, public safety, and infrastructure deployment.

A. Public Safety Implications of Eliminating Collocation Rights

Based on their operational experience delivering emergency communications, INCOMPAS members have indicated that without continued access to ILEC facilities, competitive providers will lose the ability to route 911 calls reliably, particularly during the vulnerable transition to NG911. Emergency services depend on reliable physical interconnection infrastructure, and collocation provides the redundancy and network resiliency that are essential for emergency call routing.

The loss of collocation rights could fragment emergency call routing pathways and create single points of failure in the 911 system. When competitive providers collocate in ILEC facilities, they establish diverse, physically separate paths for emergency calls, ensuring that a failure in one facility does not prevent emergency calls from reaching public safety answering points ("PSAPs"). If collocation is eliminated, competitive providers would be forced to rely on ILEC-provided transport services, reducing diversity and potentially compromising the reliability of 911 services.

This concern is particularly pressing as the industry transitions to NG911, which will enable the public to send text, images, and video to 911. NG911 requires robust, IP-based network infrastructure with sufficient capacity and redundancy to handle multimedia communications in emergency situations. Eliminating collocation rights at this critical juncture could undermine the Commission's NG911 deployment goals and put public safety at risk.

"provides competitive LECs with the most flexibility and generally is the most economical and practical option for interconnection").

B. Impact on Competition in Rural and Underserved Markets

Members have also raised concerns that relaxing collocation requirements will have severe impacts on competition, particularly in rural areas and underserved markets. Collocation enables these competitive carriers to serve customers without duplicating the entire local infrastructure, which would be economically infeasible in most rural areas. Alternative IP interconnection points may not exist in many geographic areas, particularly in rural regions where carrier-neutral colocation facilities and internet exchange points are scarce or nonexistent. In these markets, ILEC central offices are often the only practical locations where competitive providers can interconnect their networks with the ILEC's facilities and with other carriers. Forbearance from Section 251(c)(6) would eliminate this option, effectively foreclosing competition in precisely those areas where it is most needed.

The rural broadband gap remains one of the nation's most pressing challenges, as recognized by Congress in its recent efforts to fund broadband deployment programs.[29] Competitive providers play a crucial role in bridging this gap, often serving areas that ILECs have neglected or underserved. Eliminating collocation rights would entrench ILEC monopolies in rural markets and undermine efforts to expand broadband access to unserved and underserved communities.

C. Threat to Fiber Facilities and Broadband Network Infrastructure

In addition to voice interconnection, collocation sites serve as critical access points for competitive fiber infrastructure. Many competitive carriers, including INCOMPAS members,

[29] *See*, *e.g.*, Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429 (2021) (appropriating $42.45 billion for the Broadband Equity, Access, and Deployment Program to expand broadband infrastructure).

use collocation arrangements to establish fiber backhaul connections, interconnect their broadband networks, and provide high-capacity services to business and institutional customers. These collocated facilities represent substantial capital investments—often millions of dollars per location—in network equipment, fiber optic cables, power systems, and environmental controls.

The elimination of collocation rights could strand these fiber investments and force competitive providers to abandon facilities that are critical to their network operations. In many cases, there are no viable alternative locations where carriers could relocate their equipment while maintaining network connectivity. The loss of physical access to ILEC central offices could force costly network redesigns, service discontinuations, and in some cases, complete withdrawal from markets where competitive providers currently serve customers.

This outcome would directly undermine Congressional broadband deployment goals and the Commission's own deployment priorities. Congress has appropriated tens of billions of dollars through programs such as the Broadband Equity, Access, and Deployment ("BEAD") Program to expand broadband infrastructure. Much of this infrastructure depends on competitive providers having access to facilities for network interconnection and backhaul. Eliminating Section 251(c)(6) protections would work at cross-purposes with these federal broadband initiatives and could waste taxpayer investments in broadband deployment.

D. Protection of Existing Embedded Networks

Competitive carriers have made substantial capital investments in collocated equipment based on the reasonable expectation that Section 251(c)(6) collocation rights would continue to be available. These investments were made in reliance on federal law and Commission

regulations that have been in place for nearly three decades.[30] Many existing TDM-based arrangements continue to serve customers effectively and reliably, and an abrupt elimination of collocation protections would create stranded investment and service disruption risks.

INCOMPAS members have consistently emphasized the need for grandfathering provisions to protect these legitimate reliance interests. At a minimum, any forbearance from Section 251(c)(6) must include comprehensive protections for existing collocated networks, including: (1) preservation of current collocation arrangements and pricing agreements; (2) fair compensation if ILECs seek to reclaim space previously allocated to competitive carriers; and (3) prohibition on retroactive disruption of functioning competitive infrastructure.

Without such protections, competitive providers could face the prospect of being forced to abandon equipment they own, losing access to customers they have served for years, and writing off investments made in good faith reliance on federal law. This would be fundamentally anticompetitive and would discourage future infrastructure investment by creating regulatory uncertainty about whether such investments will be protected.

V. THE COMMISSION MUST UNDERTAKE A COMPLETE AND MANAGED TRANSITION TO IP INTERCONNECTION FOR NUMBERED VOICE SERVICES

Given the substantial concerns outlined above, INCOMPAS urges the Commission to adopt a cautious, measured approach to any forbearance from Sections 251(c)(2) and 251(c)(6). If the Commission concludes that some degree of regulatory relief is warranted to facilitate the

[30] *See, e.g.*, *Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, End User Common Line Changes*, CC Docket Nos. 96-262, 94-1, 91-213, 95-72, First Report and Order, 12 FCC Rcd 15982 at para. 179 (1997) (recognizing that collocation supports competitive entry and consumer benefits).

IP transition, it should adopt strong transitional protections and clear conditions to ensure that competition, public safety, and network reliability are preserved.[31]

A. Section 251(c)(2) Obligations Remain Essential

Section 251(c)(2) of the Telecommunications Act requires ILECs to provide interconnection for the transmission and routing of telephone exchange service and exchange access.[32] These obligations were established by Congress specifically to prevent ILECs from using their control over essential facilities to disadvantage competitors and harm consumers.[33] The transition from TDM to IP technology does not eliminate the underlying market power that Section 251(c)(2) was designed to address.

As trade associations including NCTA—The Internet & Television Association and the Competitive Carriers Association have recognized in prior proceedings, ILEC bottleneck control persists in the IP era.[34] Competitive providers must still interconnect with ILEC networks to complete calls to and from their customers, and ILECs retain the technical and economic ability to impose unreasonable terms for such interconnection. The shift from circuit-switched to packet-switched technology does not diminish this fundamental asymmetry.

The Commission should therefore retain Section 251(c)(2) interconnection obligations throughout the IP transition and should clarify that these obligations apply equally to IP-based

---

[31] 47 U.S.C. § 251(d)(2) (requiring Commission to consider, in establishing regulations to implement Section 251, "the need to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications services, and safeguard the rights of consumers").

[32] 47 U.S.C. § 251(c)(2).

[33] *See generally Local Competition Order*.

[34] *See Notice* at n. 87.

interconnection. This would provide competitive providers with the regulatory certainty they need to continue investing in their networks and ensure that ILECs cannot use the transition as an opportunity to impose discriminatory terms.

B. Grandfather Existing Collocation Arrangements

At a minimum, any forbearance order must include comprehensive grandfathering provisions to protect existing collocated networks and pricing agreements. Competitive providers have invested hundreds of millions of dollars in collocation facilities based on the longstanding regulatory framework established by the Telecommunications Act. These investments were made in good faith and with the reasonable expectation that collocation rights would remain available.

Grandfathering provisions should ensure that: (1) all current collocation arrangements continue under their existing terms and conditions; (2) pricing for grandfathered arrangements remains subject to the Commission's just and reasonable standard; (3) ILECs cannot unilaterally terminate or substantially modify grandfathered arrangements without Commission approval; and (4) if ILECs seek to reclaim space previously allocated to competitive carriers, they must provide fair compensation for any stranded investments and reasonable transition periods to allow carriers to relocate their equipment.

Furthermore, grandfathering should extend not just to current physical arrangements, but also to the ability to adjust commercial arrangements to upgrade and modify equipment to support IP-based services. Competitive providers must be able to evolve their collocated networks to support modern IP protocols without losing the benefit of their grandfathered arrangements. Otherwise, the grandfathering provisions would provide only temporary

protection and would force carriers to choose between maintaining legacy TDM equipment or abandoning their collocation rights.

C. Retain Collocation Requirements During the Transition Period

The Commission should maintain Section 251(c)(6) collocation obligations until competitive alternatives have been proven viable in practice. The mere theoretical availability of carrier-neutral colocation facilities or IP-based interconnection is insufficient. Instead, the Commission must ensure that such alternatives actually exist, are accessible to competitive providers of all sizes, and provide equivalent functionality to traditional collocation arrangements.

To this end, the Commission should establish clear, objective metrics for evaluating when forbearance from Section 251(c)(6) would be appropriate. These metrics should include: (1) geographic availability of alternative interconnection points, measured on a granular, market-by-market basis; (2) demonstrated willingness of ILECs to provide IP interconnection on reasonable terms; (3) cost comparability between collocation and alternative arrangements; and (4) maintenance of network diversity and redundancy for public safety purposes.

D. Condition Any Forbearance on Meaningful Competitive Safeguards

If the Commission proceeds with forbearance despite the concerns raised by INCOMPAS and other parties, it must condition such forbearance on the establishment of meaningful competitive safeguards. First, ILECs should be required to demonstrate that they have established effective alternative IP interconnection options before forbearance takes effect. This demonstration should include evidence that: (1) IP interconnection for numbered voice services is available at reasonable cost and on nondiscriminatory terms; (2) the performance and reliability of IP interconnection is equivalent to or better than legacy TDM arrangements; (3) IP

interconnection is geographically available throughout the ILEC's service territory; and (4) sufficient capacity exists to handle current and projected traffic volumes.

Second, the Commission should mandate non-discriminatory IP interconnection terms. ILECs should be required to offer IP interconnection on the same terms and conditions to all requesting carriers, without discrimination based on carrier size, technology platform, or competitive position. These non-discrimination requirements should extend to pricing, service quality, network performance, and operational processes.

Third, the Commission should establish streamlined dispute resolution mechanisms specifically for IP interconnection disputes.[35] Given the technical complexity of IP networks and the rapid pace of technological change, traditional complaint processes may be too slow and cumbersome to address emerging issues. The Commission should consider expedited arbitration procedures, similar to those available under Section 252 for interconnection agreements, to resolve IP interconnection disputes quickly and efficiently.

Fourth, the Commission should explore the potential for carrier-neutral locations as an alternative to traditional ILEC-controlled collocation sites. This could include promoting the development of independent interconnection facilities, similar to internet exchange points, where multiple carriers can interconnect on neutral terms. The Commission could facilitate this development through regulatory incentives, technical standards development, or other appropriate mechanisms.

Finally, the Commission should affirm that IP interconnection agreements for the exchange of traffic are subject to the bill-and-keep compensation rules contained in 47 C.F.R. §§

[35] 47 U.S.C. § 252 (establishing procedures for negotiation and arbitration of interconnection agreements).

51.701–51.715.[36] These regulations establish a default bill-and-keep framework for the exchange of telecommunications traffic, which has proven workable and efficient for interconnection arrangements.[37] Clarifying that bill-and-keep applies to IP interconnection would provide regulatory certainty, reduce transaction costs associated with negotiating complex intercarrier compensation arrangements, and prevent ILECs from using the IP transition as an opportunity to impose new termination charges or access fees that were eliminated under the prior intercarrier compensation reform proceedings. The Commission should make clear that numbered voice services exchanged via IP interconnection are subject to the same bill-and-keep principles that currently govern such traffic, ensuring competitive neutrality and preventing discriminatory pricing based on technology platform.

E. The Transition Must Include Phased Implementation with Realistic Timelines

In the *Notice*, the Commission suggests a date certain of December 31, 2028 for the elimination of interconnection obligations.[38] While the transition to IP is necessary and supported by our members, it should not be dictated by an arbitrary date certain without meaningful and enforceable safeguards and guidelines in place. Furthermore, two years to require providers to pivot and redesign fundamental aspects of their networks is simply not realistic, particularly when the IP interconnection framework itself has not yet been established.

Instead, the Commission should adopt a phased approach that takes into account the magnitude of changes required. Voice service providers must undertake significant

[36] 47 C.F.R. § 51.701 *et seq*.

[37] *See Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (*USF/ICC Transformation Order*) (establishing bill-and-keep framework for intercarrier compensation).

[38] *See Notice* at para. 44.

modifications to how voice traffic is provided, including redesigning networks that have relied for decades on and currently use interoffice transport and traffic exchange arrangements. These changes require substantial capital investments in short order and the negotiation of new IP interconnection agreements with multiple parties. All of these required steps take considerable time to execute properly, even for providers whose networks already extensively use fiber infrastructure. The physical infrastructure is only part of the equation—providers must also modify software systems, operational support systems, billing platforms, and network management tools to support IP interconnection.

Moreover, the timing of any forbearance has significant financial implications. Capital budgets for 2026 have already been set by most competitive providers and approved by their boards of directors or investors. A forbearance deadline that forces unplanned capital expenditures puts providers at a severe disadvantage with investors and financial institutions. Obtaining financing for major network modifications typically requires significant lead time (often six months to a year or more) to prepare business cases, conduct due diligence, negotiate terms, and close financing arrangements. An arbitrary two-year deadline does not account for these practical business realities.

Another critical factor is the competitive dynamics created by a specific forbearance deadline. Setting a date certain for forbearance, regardless of whether reasonable and nondiscriminatory terms, conditions, and rates are available, unequivocally puts competitive providers at a significant disadvantage vis-à-vis incumbents. As the deadline approaches, incumbent leverage and negotiating power over IP interconnection arrangements, interoffice transport options, and even use of UNEs increases dramatically. This renders competitive providers in positions where they may be forced to agree to terms, conditions, and rates that are

neither reasonable nor included in existing budgets and business plans, simply to avoid service disruptions when the forbearance takes effect. This is the antithesis of a competitive marketplace and would reward ILECs for their refusal to voluntarily offer IP interconnection on reasonable terms over the past decade.

Implementation should therefore be phased based on provider size and capabilities, with initial compliance obligations on high-volume transit and terminating providers. Large ILECs with substantial resources and technical capabilities should be required to offer IP interconnection first, followed by smaller LECs on a reasonable schedule. This approach recognizes that carriers have different levels of resources and technical sophistication, and allows the industry to develop best practices and resolve technical issues through early implementation before requiring universal compliance.

At a minimum, if the Commission determines it must establish a specific date—again, with recognition of specific phased-in implementation requirements that must be met—the Commission should establish the beginning of a transition path that aligns with the end of the UNE-Dark Fiber forbearance timeline in February 2029.[39] Providers made substantial business decisions based on that date regarding network design and implementation, including decisions about where to deploy fiber facilities versus where to rely on dark fiber UNEs. A forbearance date of December 2028 for interconnection and collocation, coming just two months before the dark fiber transition deadline, could put providers relying on the UNE-Dark Fiber forbearance timeline at a severe disadvantage and force them to make rushed decisions about network architecture without adequate time to evaluate all options.

[39] 47 CFR § 51.319(c)(2)(iv).

However, a date certain is ultimately less important than the Commission providing sufficient oversight and establishing appropriate safeguards to ensure that the transition happens in a manner that preserves competition and occurs without disruption to voice services or other critical services, particularly 911 and public safety communications.

VI. CONCLUSION

The transition away from TDM to IP-based networks presents a significant opportunity to modernize the nation's telecommunications infrastructure, improve network resiliency, and enhance public safety communications. However, this transition must be managed carefully to ensure that it strengthens competition, interconnection, and the Commission's broader public interest goals for voice services. INCOMPAS and its members are fully committed to completing the IP transition and have invested substantially in IP-capable networks to support that goal. However, forbearance from Sections 251(c)(2) and 251(c)(6), critical Telecommunications Act obligations, without enforceable safeguards, continued collocation rights, and viable IP interconnection paths would undermine these goals and harm consumers, competitive providers, and public safety.

As this filing has demonstrated, the threats posed by premature forbearance are real and immediate. 911 services face potential disruption, STIR/SHAKEN authentication will continue to be hindered, and enhanced caller presentation solutions cannot be deployed without end-to-end IP connectivity. Perhaps most concerning, competitive providers face the prospect of being locked out of markets they have served for decades. ILECs continue to make decisions that perpetuate TDM-based interconnection, not because of regulatory requirements, but because the existing arrangements are profitable and serve to disadvantage competitors. Eliminating the regulatory backstop of Section 251 obligations before establishing workable IP alternatives

would simply entrench ILEC market power and allow them to extract monopoly rents during and after the transition.

INCOMPAS therefore urges the Commission to: (1) proceed cautiously with any forbearance proposals and ensure that adequate safeguards are in place before eliminating longstanding competitive protections; (2) retain interconnection for numbered IP voice service as well as collocation protections during the transition to ensure that competitive providers can continue to serve their customers; and (3) mandate IP interconnection as a condition of any forbearance to protect public safety, enable robocall mitigation, and preserve competition. By taking these steps, the Commission can ensure that the IP transition delivers on its promise of improved service, greater efficiency, and continued innovation for the benefit of all Americans.

Respectfully submitted,

INCOMPAS

/s/ Christopher L. Shipley

Christopher L. Shipley
Executive Director of Public Policy
2025 M Street NW, Suite 800
Washington, DC 20036

January 20, 2026