

ITCI Industry Watch

IP Interconnection

Last week, the FCC adopted a Notice of Proposed Rulemaking (NPRM), to grant forbearance from ILEC interconnection obligations under Sections 251(c)(2) and 251(c)(6) of the Communications Act. Under the proposal, these obligations would sunset December 31, 2028.

The Commission's goal is to accelerate the industry's transition to all-IP networks by phasing out regulatory requirements that effectively require ILECs to maintain legacy TDM switching facilities. The FCC notes that these networks are obsolete and divert investment away from modern broadband and IP voice services. As of June 2024, approximately 74.5% of residential voice subscriptions and 80.2% of business voice subscriptions were already using IP technology. ILEC access lines account for only 3.1% of the voice telephone market.

Under the NPRM, ILECs would remain subject to the interconnection obligations that apply to all telecommunications carriers, but they would no longer be subject to the additional mandates put on ILECs, they would instead follow the same rules as CLECs. The FCC stresses that the proposal would not prohibit carriers from maintaining TDM interconnection where necessary, but it would remove outdated regulatory requirements.

The FCC also requests feedback on whether the proposed December 31, 2028 transition date provides sufficient time for all providers or whether staggered compliance dates may be needed, particularly for smaller or rural carriers.

The Commission seeks comment on the impacts to public safety and 911 service continuity, including areas where NG 911 has not yet been fully deployed and legacy selective router infrastructure remains in use.

While the proposal may reduce regulatory and compliance burdens for some providers, the FCC acknowledges that small and rural carriers may face transition-related costs. The Commission requests detailed input on such impacts.

Do Not Originate Requirement

The FCC continues to move forward with additional measures to combat illegal robocalling and caller ID spoofing. As part of its Eighth Report and Order under the FCC's Call Authentication/Robocall Mitigation framework, all voice service providers must implement and maintain a "Do Not Originate" (DNO) list solution by December 15, 2025.

A DNO list contains telephone numbers that should never be used to originate outbound calls. These include: Numbers assigned to inbound-only services, unassigned or unused numbers, numbers associated with government agencies or financial institutions that are frequently spoofed. Any calls appearing on your network with a number on the DNO list are presumed to be spoofed and must be blocked.

By December 15, 2025, each provider must use a reasonable DNO blocking mechanism, must block calls originating from numbers on the DNO list before they reach end users, and the list should be updated continuously. Some companies partnered with vendors such as TransNexus, TNS, Somos, or Neustar, others are still deciding. Any approach is acceptable as long as it is effective, regularly updated, and is applied across your network. There are no small-provider exemptions for this rule.

Notes in the News

- Government Shut-down in week 5 - Most FCC electronic filing and database systems remain unavailable to the public. Filing deadlines scheduled during the suspension are extended to the next business day after operations resume.
- BEAD builds can affect High-Cost USF Support - If BEAD funds are used to build over top of areas already supported by USF, USAC and the FCC may later reduce or eliminate USF support because the location is no longer considered "high cost" to serve.



ITCI Celebrated Key Milestone Anniversaries

Jerry Burmeister - 40 years

Lori Deal - 35 years

Teresa Weispfennig - 35 years

Thanks for all your hard work
and dedication!

ITCI Client Seminar



Nov. 19 - 20, 2025

Form Deadlines

December 31, 2025 - Form 509
(CAF-BLS)

December 31, 2025 - MN Tele-Relay
Filing

ITCI Industry Events

November 9-12, 2025 - NECA
Expo

November 19-20, 2025 - ITCI
Client Seminar

December 4, 2025 - MTA GM
Peer Group

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We're here for you!