Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

REPLY COMMENTS OF THE WIRELESS INFRASTRUCTURE ASSOCIATION

The Wireless Infrastructure Association ("WIA")[1] respectfully submits these reply comments in response to the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceedings.[2] WIA supports the Commission's proposal to streamline the network modernization process because for too long a frozen regulatory structure has led to inefficient investment in backwards-looking technologies. The Commission's proposals are a sensible plan that will allow network operators to invest more efficiently in forward-looking broadband technologies, like wireless, that will serve customers across the country for years to come.

The American public has fully embraced wireless communications—mobile and fixed—as their preferred means of connectivity. Wireless has become the dominant means of connecting by voice, with "79 percent of American adults liv[ing] in households that rely solely on cell phones for voice calling."[3] In fact, many Americans have more than one wireless device as "U.S. Wireless

[1] The Wireless Infrastructure Association ("WIA") represents the businesses that build, develop, own, and operate the nation's wireless infrastructure. Members include infrastructure providers, wireless carriers, and professional services firms that are responsible for telecommunications facilities around the globe.

[2] *Reducing Barriers to Network Improvements and Service Changes; Accelerating Network Modernization*, Notice of Proposed Rulemaking, and Orders or Reconsideration, WC Docket Nos. 25-209; 25-208, FCC 25-37 (rel. July 25, 2025) ["*Network Modernization NPRM*"].

[3] Comments of USTelecom, WC Docket Nos. 25-208, 209, at 8 (filed Sept. 29, 2025) (citing the Center for Disease Control's National Center for Health Statistics).

connections grew again [last year] now reaching 579M—that's 1.7 connections for every person."[4] Meanwhile, 5G fixed wireless access is, for the third year in a row, the fastest growing form of home broadband; capturing 99 percent of new subscriptions—a one-year subscribership increase of 2.7 million homes for a total of nearly 12 million homes subscribing to this technology—and this total is expected to increase to over 20.4 million over the next three years.[5] The staggering adoption statistics for mobile and fixed wireless belie some commenters' claims that wireless is a less desirable or second-class technology—wireless is competing, and winning, against wireline technologies (cable, fiber, and DSL) every day all to the benefit of the American consumer.[6]

Wireless services, underpinned by wireless infrastructure, perform for Americans. Commenters detracting from wireless capabilities reliability cannot substantiate their claims with current information. For example, Public Knowledge and CWA cite a nearly decade old study to suggest that foliage, distances, and weather conditions make wireless unreliable.[7] The study admits that at that time it was written, 5G standards had not yet been defined so "[s]uggesting that 5G can currently or in the near to medium term serve as a substitute for adequate wireline service is suggesting that a non-existent, not-deployed technology should serve as an alternative."[8] The

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[4] Patrick Halley, *Over 13 Million Homes and Counting: Maximizing the Promise of 5G Home Internet Service with Smart Policies*, WIA (Aug. 21, 2025), https://wia.org/over-13-million-homes-and-counting-maximizing-the-promise-of-5g-home-internet-service-with-smart-policies/. *See also* CTIA, *Annual Survey Highlights*, at 4 (2025), https://api.ctia.org/wp-content/uploads/2025/09/2025-Annual-Survey-Highlights.pdf.

[5] CTIA, *Annual Survey Highlights* at 6.

[6] *See* Patience Haggin, *A Fight Between Cable and Wireless Providers Means Cheaper Home Internet for You*, WALL ST. J. (June 24, 2025), *https://www.wsj.com/business/telecom/a-fight-between-cable-and-wireless-providers-means-cheaper-home-internet-for-you-b36cc086*.

[7] Comments of Public Knowledge and CWA, WC Docket Nos. 25-208, 209, at 14 (filed Sept. 29, 2025) (citing CTC Technology & Energy, "*Mobile Broadband Service Is Not an Adequate Substitute for Wireline*" (Oct. 2017), available at https://www.ctcnet.us/wp-content/uploads/2017/10/CTC-Mobile-Broadband-White-Paper-final-20171004.pdf [hereinafter "CTC Report"]).

[8] CTC Report at 1.

report instead finds that "[e]ven DSL networks can deliver a higher bandwidth, more reliable experience to consumers than can mobile. . . ."[9] History has shown otherwise. 5G networks now cover over 330 million Americans[10] and offer median download speeds in the 158 Mbps - 299 Mbps range.[11] Also, the study based its hypothesis about the reliability of 5G on an assumption that millimeter wave spectrum would be the 5G spectrum of choice when in fact mid-band spectrum, with much different propagation characteristics, is the 5G workhorse with millimeter wave deployed in more dense areas.[12] There is no question that modern wireless networks are outperforming legacy copper facilities, disproving a decade-old predictive report to which the Commission should give no weight.

Finally, for areas undergoing a technology transition, consumers and policy makers alike have substantial visibility into whether wireless is available in any given area. In fact, mapping of wireless coverage has never been better. Congress passed the Broadband DATA Act in 2020, requiring wireless providers to report their coverage area with a high degree of precision.[13] The law requires providers to "take into consideration the effect of clutter" and provide other technical information to the Commission about performance at the cell edge.[14] Five years later, the

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[9] *Id.*

[10] *See* CTIA, *5G in America*, https://www.ctia.org/the-wireless-industry/5g-in-america (last visited Nov. 18, 2025).

[11] Ookla, *United States Speedtest Connectivity Report,* https://www.ookla.com/research/reports/united-states-speedtest-connectivity-report-h1-2025 (last visited Nov. 18, 2025) (providing data on U.S. network performance from January through June 2025).

[12] CTC Report at 20 ("The use of high-capacity, high-frequency, millimeter-wave spectrum will make these wireless signals even more susceptible to attenuation problems caused by foliage and buildings than current wireless technologies.").

[13] Broadband Deployment Accuracy and Technological Availability Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) (codified at 47 U.S.C. §§ 641-646) ["Broadband DATA Act"].

[14] *Id.* at § 642(b)(2)(B).

Commission has fully implemented the law and providers have refined their collection techniques. Today, the FCC's National Broadband Map not only shows LTE wireless coverage as initially required by the statute, but also where two different speed types of 5G are available on a location-by-location basis.[15] Further, these maps are updated twice a year, have now incorporated the results of consumer challenges, and providers must attest to their accuracy under federal law.[16] While some point to the limitations inherent in any mapping exercise, it is no longer the case that "wireless service may be available a mile down the road but . . . that distant services is of no use"[17]—coverage maps have evolved significantly to more effectively pinpoint performance and availability.

The coverage provided is essential too because Americans overwhelmingly turn to their wireless devices in times of need. The record shows that "80% of all 911 calls today are made over wireless phones"[18] because of their convenience and reliability. No communications system is infallible, yet wireless systems deliver massive reliability for Americans every day. In addition to this convenience and reliability, wireless networks are turbo-charging public safety operations. Modern broadband networks are critical for NG9-1-1 systems which rely on "multimedia-rich, all-Internet Protocol ("IP") environments"[19] that cannot be supported by legacy copper networks. Meanwhile, ubiquitous and high-speed wireless networks have unleashed new tools for first responders, including transforming ambulances into mobile emergency rooms allowing life-saving

[15] *See* FCC, National Broadband Map, https://broadbandmap.fcc.gov/home (last visited Nov. 18, 2025).

[16] Broadband DATA Act at Sec. 643.

[17] Comments of AARP, WC Docket Nos. 25-208, 209, at 14 (filed Sept. 29, 2025).

[18] Comments of USTelecom at 19.

[19] Comments of NENA: The 9-1-1 Association, WC Docket Nos. 25-208, 209, at 1 (filed Sept. 29, 2025).

care to be administered while patients are in transport.[20] Additionally, innovative network management that leverages 5G network's unique capabilities have enabled network operators to provide additional dedicated capacity and coverage for first responders, ensuring reliable connectivity no matter where the emergency is.[21]

The Commission is correct to consider how its network modernization rules can spur the deployment of new advanced services, like wireless communications, as a replacement for legacy services. Americans already overwhelmingly depend on wireless services so WIA supports the Commission updating its rules and policies to reflect the realities of the modern communications market and also to spur greater investment in new technologies moving forward.

Respectfully submitted,

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[20] *See, e.g.*, James Careless, *How 5G Is Shaping the Future of Public Safety Technology for First Responders*, ALL THINGS FIRSTNET (Sept. 1, 2025), https://allthingsfirstnet.com/how-5g-is-shaping-the-future-of-public-safety-technology-for-first-responders/.

[21] *See, e.g.*, T-Mobile, *First Responders Get Top Priority on America's Best Network*, https://www.t-mobile.com/t-priority (last visited Nov. 18, 2025).