

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

In the Matter of)
)
) WC Docket No. 25-253
Build America: Eliminating Barriers to)
Wireline Deployments)
)

REPLY COMMENTS OF THE WIRELESS INFRASTRUCTURE ASSOCIATION

The Wireless Infrastructure Association (“WIA”)¹ respectfully submits these reply comments to highlight responses in the record to the Commission’s Notice of Inquiry (“NOI”) in the above-captioned proceeding.² For WIA’s members actively deploying wireline solutions, as well as the important role fiber backhaul and wireline deployments play in the broader wireless ecosystem, ensuring a predictable, proportionate, and transparent permitting process is crucial. However, as commenters highlight, there still exists significant uncertainty—along with excessive and onerous requirements—for many of these deployments. Accordingly, WIA supports the Commission proceeding with creating rules consistent with recommendations in the record to ensure the timely deployment of these networks.³

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 *Build America: Eliminating Barriers to Wireline Deployments*, Notice of Inquiry, FCC 25-66 (rel. Sept. 30, 2025) [“NOI”].

³ *See generally*, Comments of Crown Castle Fiber, WC Docket No. 25-253 (Nov. 18, 2025); Comments of T-Mobile USA, Inc., WC Docket No. 25-253 (Nov. 18, 2025) [“Comments of T-Mobile”]; Comments of USTelecom, WC Docket No. 25-253 (Nov. 18, 2025); Comments of Incompas, WC Docket No. 25-253 (Nov. 18, 2025); Comments of U.S. Chamber of Commerce, WC Docket No. 25-253 (Nov. 18, 2025).

This proceeding is further timely as the world finds itself on the precipice of the AI revolution. The country that will lead in this revolution will have to lead in broadband connectivity as well. Broadband will be foundational to both the training and deployment of AI systems, enabling the fast transmission of vast amounts of data among and between consumers, researchers, and industry.⁴ WIA applauds the Commission for its leadership in this space through its “Build America” Agenda including this proceeding and the related wireless NPRM.⁵ As considered in the Administration’s AI Action Plan⁶ and recent Executive Order,⁷ the FCC has an important role in ensuring Americans have access to the connectivity today that will be instrumental for the nation’s continued leadership in this revolution and beyond. WIA agrees and supports the recommendations in the record and discussed below which present effective and actionable insights to support that mission.

While WIA recognizes the important role of local governments in managing public resources and ensuring public safety, the record demonstrates that excessive delays, non-cost-based fees, and inconsistent permitting practices are not merely the result of responsible

⁴ See, e.g., Comments of USTelecom at 3 (“[The NOI] provides an important opportunity to establish consistent, fair, and transparent standards that will turbocharge America’s next-generation network infrastructure deployment and accelerate American leadership in AI.”); Comments of U.S. Chamber of Commerce at 3-4 (discussing the impacts of a patchwork of inconsistent AI regulations could jeopardize this nascent ecosystem).

⁵ *Build America: Eliminating Barriers to Wireless Deployments*, Notice of Proposed Rulemaking, WT Docket No. 25-276 (rel. Sept. 30, 2025).

⁶ See *America’s AI Action Plan* at 3 (July 2025), <https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf> (directing the FCC to evaluate whether state AI regulations interfere with the agency’s obligations under the Communications Act).

⁷ See E.O. 14365, *Ensuring a National Policy Framework for Artificial Intelligence*, 90 Fed. Reg. 58499 at 58500 (Dec. 16, 2025) (“[T]he Chairman of the Federal Communications Commission shall, in consultation with the Special Advisor for AI and Crypto, initiate a proceeding to determine whether to adopt a Federal reporting and disclosure standard for AI models that preempts conflicting State laws.”).

stewardship, but often constitute material barriers to deployment.⁸ The Commission's authority under Section 253 is clear: state and local requirements that prohibit or have the effect of prohibiting the provision of telecommunications services are inconsistent with congressional objectives to facilitate the rapid and ubiquitous deployment of communications networks and should not be allowed.⁹

Accordingly, as numerous commenters highlight, the Commission should use this opportunity to address these persistent barriers to deployment. Consistent themes from commenters that require FCC action include excessive or otherwise discriminatory fees,¹⁰ in-kind compensation demands,¹¹ unrelated permit conditions,¹² and other permitting requirements that are unpredictable or otherwise cause delays.¹³ WIA further agrees with the many commenters who encourage uniform best practices from the Commission along with enforceable rules, including shot clocks and deemed-granted remedies in order to improve the deployment landscape.¹⁴ Finally, as some commenters provide, these rules should be equally applicable to wireline infrastructure regardless of whether other, non-telecommunications services can or could

⁸ *See generally*, Comments of Crown Castle Fiber; Comments of T-Mobile; Comments of Incompas; Comments of U.S. Chamber of Commerce.

⁹ *See* 47 U.S.C. § 253. *See also* Comments of Crown Castle Fiber at 16-18 (discussing the regulatory and procedural history supporting the Commission applying Section 253 authority to wireline deployments); Comments of T-Mobile at 7-11 (providing examples of excessive state and local reviews have created substantive barriers to deployment).

¹⁰ Comments of Crown Castle Fiber at 16-24; Comments of USTelecom at 4-8.

¹¹ Comments of Incompas at 16-17; Comments of T-Mobile at 12.

¹² Comments of Incompas at 17-18 (providing specific examples of unrelated conditions required for permit processing); Comments of USTelecom at 6-8.

¹³ Comments of Crown Castle Fiber at 13-17; Comments of T-Mobile at 2, 7-9; Comments of U.S. Chamber of Commerce at 2-3.

¹⁴ *See* Comments of Incompas at 8.

travel over that infrastructure.¹⁵ Ensuring its siting rules apply to wireline infrastructure that supports so-called “comingled services” is instrumental to the Commission supporting technological advancements and enabling new connected solutions.¹⁶

WIA urges the Commission to adopt clear, enforceable standards in this proceeding that will eliminate unnecessary barriers to wireline deployment, promote competition, and accelerate the availability of high-speed communications services to all Americans. Based on the responses in the record from the businesses and organizations working to deploy broadband every day, there is clear need for the Commission to act to remove excessive and onerous reviews that delay and deter these needed deployments. WIA looks forward to working with the Commission and all stakeholders to craft rules that will bring connectivity and the associated opportunities to all Americans.

Respectfully submitted,

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¹⁵ See Comments of Incompas at 35 (“Together, these authorities support the Commission’s power to preempt state and local measures that materially inhibit the deployment or use of telecommunications facilities, including facilities that deliver both regulated telecommunications services and co-mingled data or AI-enabled applications.”); Comments of Crown Castle at 27 (pointing to the Commission’s previous action in applying siting protections to comingled infrastructure and urging clarity on the issue in this proceeding).

¹⁶ See Comments of Crown Castle at 27 (citing *In re Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment et al.*, Declaratory Ruling and Third Report and Order, 33 FCC Rcd 9088 at para. 167 (2018)).

December 18, 2025