

IRREGULATORS

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

In the Matter of)	
)	
Accelerating Wireline Broadband Deployment by)	WC Docket No. 17-84
Removing Barriers to Infrastructure Investment)	
)	
Accelerating Wireline Broadband Deployment by)	
Removing Barriers to Infrastructure Investment)	
)	
Technology Transitions)	
)	
Adopted: March 20, 2025)	

**APPLICATION FOR A FULL REVIEW BY THE FULL COMMISSION;
& OTHER ACTIONS REQUESTED**

IRREGULATORS

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TO: Secretary
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DOC-410304A1
GN Docket No. 13-5, WC Docket No. 17-84
Federal Communications Commission
Washington, DC 20554

RESTART THE PROCEEDING WITH COMMENT PERIOD.
REQUEST OPEN MEETING AND DEBATE: TO CLARIFY
AND REMOVE THE BURDENS AND ALLEVIATE OUR HARMS.

April 19th, 2025

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- RE: We request an immediate halt to the wireline bureau order and order of clarification of March 20th, 2025 and the reopening of this proceeding for full public comments and full review by all Commissioners.
- RE: We request an open meeting and debate with the FCC.
- RE: This Request and the information supplied herein is tied to Delete, Delete, Delete, the FCC Joint State Board on Jurisdictional Separations, and both have an open comments period.

1) The Regulations and Laws:

We base our right to request a full review via § 1.115 application for review of action is pursuant to delegated authority.

§ 1.115 Application for review of action taken pursuant to delegated authority, “DA”.

(a) Any person aggrieved by any action taken pursuant to delegated authority may file an application requesting review of that action by the Commission. Any person filing an application for review who has not previously participated in the proceeding shall include with his application a statement describing with particularity the manner in which he is aggrieved by the action taken and showing good reason why it was not possible for him to participate in the earlier stages of the proceeding. Any application for review which fails to make an adequate showing in this respect will be dismissed.”

The retirement of the copper networks has been an embarrassment of monumental proportions for decades and it is the irony in 2025 that the footprints of AT&T, Verizon and Centurylink are, in fact, the original Bell system state telecommunications utilities, most of which started by the turn of the century -- the 20th Century -- hiding in plain sight. And the utilities are NOT just the copper wires, referred to as legacy, but include all of the fiber optic wires that have been installed as part of the state utility, from the back haul, BDS, and all other data services. Moreover, the construction budgets went to wireless, leaving the copper wires to deteriorate and created the Digital Divide. This was also a bait and switch as Verizon and AT&T continually made claims that they will be putting in fiber, when their track record shows a continuous stream of broken promises.

The fact is that not one reference was made about the wires in question being part of the state utility that the holding companies control. For example, AT&T controls 21 state telecom utilities and in each state there were multiple deregulations -- with financial commitments, and fiber commitments, But at the core, there have been an undercurrent where customers have become defacto investors, being charged for network upgrades most never received. And the regulators failed the public as there is no recognition by the FCC dealing with any of these issues.

And over the last 3 decades, we have been on record with documentation, etc. Thus, since 2001, the IRREGULATORS, (and previously New Networks Institute and Teletruth) were harmed, as was the American Public.

2) We and America are being harmed.

The removal of the legitimate process and the IRREGULATORS right to be heard and defend the Public Interest (including seniors, low income families and rural and inner city residents, and all of us on the other side of the Digital Divide) has been put on mute.

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We were not invited to the FCC to meet with staff, and it is harmful that we had comments that would have been presented but there was no opportunity, Worse, there was no discussion by the Commissioners, But, at the core, history is repeating and it is harming all of us.

3) We have been part of these proceedings since 2001, and filing at the FCC since 1994;

We have filed multiple times pertaining to these issues. And we have documented continuously our concerns about severe fundamental missing material facts. We also found the manipulation of almost every data point and worse, the FCC's reliance on corporate funded, phone and cable company supplied data, which was also promulgated by their associations.

4) PARTIAL LIST OF IRREGULATORS, NEW NETWORKS INSTUTUTE AND TELETRUTH, FCC FILINGS FROM 2012-2018

Date	Type of Filing	Proceeding ID	Page
2/17/2018	REPLY	17-84, 12-353	
7/18/2017	REPLY	17-84, 17-79, 17-83,	630
7/18/2017	REPLY	13-5, 12-353, 80-286"	
3/7/2016	REPLY	13-5	17
2/3/2016	LETTER	12-353	12
2/3/2016	LETTER	13-5	12
12/16/2015	EXPARTE	13-5	63
9/30/2015	OTHER	13-5	10
12/16/2015	EXPARTE	12-353	63
9/30/2015	OTHER	12-353	10
1/28/2013	COMMENT	12-353	15
		Total	832

- Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment WC Docket No. 17-84
- Technology Transitions GN Docket No. 13-5

5) Over the last 3 decades we have shown that the FCC's data and analysis are biased and using manipulated data -- nothing has changed in 2025.

There are volumes of missing material facts. The analyses are biased and without merit, and the order may be violating basic state and federal laws. And we exposed how the FCC et al rolled out deregulation after deregulation that was dedicated to create the Digital Divide, and let the underlying networks deteriorate.

6) Access Line Accounting Manipulation. The Majority of Copper Wires are Missing.

Understating the number of copper wires is creating the false narrative.

- **AT&T told investors that** only 5% of the current lines being used are copper. But it is the slight-of-hand with the definition that is problematic.

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AT&T states:

“Only 5% of our residential customers are still using copper voice technology.”

NOTICE: “Residential”, “voice” and “copper” terms omit and hide every other line that is data or even business lines, and we assume these lines are also going to be shut off, like DSL, or U-verse, or VoIP lines — i.e., AT&T has intentionally not called attention that the company never did the upgrades of the 21 state telecom utilities it controls, and these other lines can be shut off.

Take AT&T U-Verse: Did you know that the voice service with U-verse, which uses the identical copper wires, is now an “IP” service and NOT COUNTED AS A COPPER LINE.

AT&T has made multiple announcements about fiber optics, but there is no written commitments for the number of fiber optic wires to the home. How many of these lines are going to be upgraded to fiber? History tells us that most of this is a bait and switch for crap wireless-fiber to the press release, as one reporter put it.

Thus, this definition is missing data lines, or business lines and it is missing all of the backhaul and business data services.

7) AT&T’s Wireless Substitute for Fiber? Or even phone service?

We examined this issue:

- [AT&T “Crap Wireless” Is Not Reliable: AT&T Claims No Responsibility.](#)
- AT&T claims that it is rolling out fiber, but history tells us that it’s more a cover up as the real goal is a replacement — substitute using ‘crap wireless’, also known as Fixed Wireless Access (FWA). But this is no substitution or equivalent service to wireline infrastructure.

The proposed AT&T plans are for a service called “Advanced Home Phone” and it is designed to replace the existing copper home phone with another except it is a wireless product. In 2025, AT&T refuses to take any responsibility for this service, including the most critical — E911 emergency service.

AT&T supplies us with “Terms and Conditions”, and other documents.

“5.2.5.2 Limitations of 911 Service: AT&T Phone — Advanced Service is not the same as traditional wireline telephone service, and 911 service doesn’t work the same as with traditional wireline telephones. You agree to tell anyone who may use your AT&T Phone.”

“Advanced Service of the limitations of 911 service. AT&T makes no warranty that access to 911 will be uninterrupted, timely, secure, or error-free.”

“AT&T makes no warranty that AT&T Phone Service is appropriate for or capable of use with monitored burglar or fire alarms or medical monitoring systems or devices. Use of such systems is at your own risk.”

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8) How Much Deceptive Accounting can they put in one Order? There are really multiple orders and clarifications .

At the bottom the web page for this [proceeding there are 4 different PDF documents](#) and when we examined them we realized that part of these were different.

One document highlights that the USTelecom association had filed a petition for a waiver to remove specific obligations on lines with bundles and stand alone voice calling -- USTelecom gave specific data that claimed only 1.5% of All American households were using a stand alone wireline phone

“USTelecom asserts that since the Commission adopted the Alternative Options Test, the voice marketplace is increasingly less reliant on stand-alone voice services, with the percentage of adults living in landline-only households falling to 1.3 percent of all households as customers choose alternative voice options such as mobile and interconnected VoIP service”

Notice that it claims that households, stand-alone voice, equals:

- 1.3% of the US households
- 132 million US households
- Only 1.7 million total copper-stand alone lines in the entire US.

This number is missing all business, all data services, and the households in this analysis only has service over the copper wire, and does not have a cell phone.

What this petition is doing is adding a slice to deregulate so that any variation of a family that has a copper phone line -- can be in the collection of wires that can be shut off.

But how ridiculous is this -- The Verizon NY 2020 Annual Report has 1.8 million copper lines listed, the last year the numbers weren't redacted. And NY has always been 7% of the wireline business, and thus approximately 30 million basic POTS copper wires were in use as an estimate.

Now take the data lines, and all of the other business lines not counted like back haul. In New York, Verizon had \$3.8 billion for special access and backhaul lines -- and there were zero access lines listed.. But Verizon NY Annual Report showed that local service at the time was about \$1.1 billion in revenues, with 1.8 million lines.

And yet, in 2025, the USTelecom is still putting out information that in- totality is pure gibberish.

The FCC should have asked for the total number of access lines by category, as it is clear that USTelecom and the telcos are supplying analysis to maneuver the public interest

How can the FCC rely on this data from USTelecom? It demands an explanation.

We filed multiple times against the USTelecom's analysis of access lines because it does what AT&T did -- they leave out the majority of lines in service using manipulated and deceptive language.

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- [USTelecom Attempts to Kill Off Competition Using Access Line Accounting Deception.](#)
- See 2018 [filed comments](#) for the complete story; See [USTelecom Petition](#), and [Comments](#)

We asked: How many total access lines does AT&T, Verizon and CenturyLink have in use today and how many are part of and are funded via the existing state utilities?

They only included voice, residential, copper basic phone service in all of their numbers.

9) Investment is in the pocketbooks of those who pay for the infrastructure upgrades --

The FCC never mentions that customers have been and continue to pay for network upgrades -- copper to fiber, that most will never get. Not once did the FCC look at the flows of money or how the construction for fiber to the home that was moved to wireless circa 2012.

This quote is from Verizon NY's series of rate increases that started 2 decades ago and were never halted.

June 2009: [Statement by NY Public Service Commission:](#)

"We are always concerned about the impacts on ratepayers of any rate increase, especially in times of economic stress...Nevertheless, there are certain increases in Verizon's costs that have to be recognized. This is especially important given the magnitude of the company's capital investment program, including its massive deployment of fiber optics in New York. We encourage Verizon to make appropriate investments in New York, and these minor rate increases will allow those investments to continue."

11) Verizon New York diverted billions of dollars of the utility construction budgets to build out their wireless business.

In 2012, the NY State [Attorney General claimed](#) that 75% of the capital expenditures in New York State went to fund the building of the fiber optic wires to cell sites and to FiOS, not to the maintain the state's copper networks

"Verizon New York's claim of making over a 'billion dollars' in 2011 capital investments to its landline network is misleading. In fact, roughly three- quarters of the money was invested in providing transport facilities to serve wireless cell sites and its FiOS. Wireless carriers, including Verizon's affiliate Verizon offering wireless, directly compete with landline telephone service and the company's FiOS is primarily a video and Internet broadband offering....Therefore, only a fraction of the company's capital program is dedicated to supporting and upgrading its landline telephone service."

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- 12) But it is the manipulation of the accounting formulas that stick the majority of the expenses into 1 category, local service, the copper wires. However, the fiber optic wires for FiOS and for U-verse and FWA are all part of the state utility telecommunications network and classified as Title II -- a direct contradiction, to everything being said about Net Neutrality.
- 13) This is from the Verizon New Jersey FiOS cable TV 'statewide' deployment of fiber to the home, starting 2006-2007, and published by the NJ Board of Public Utilities. This language is in almost every Verizon FiOS cable franchise, as we pointed out in our 2014 Net Neutrality filing.

FTTP network is being performed under the authority of Title II

"Verizon NJ has been upgrading its telecommunications facilities in large portions of its telecommunications service territory so that cable television services may be provided over these facilities. This upgrade consists of deploying fiber optic facilities directly to the subscriber premises. **The construction of Verizon NJ's fiber-to-the-premises FTTP network (the FTTP network) is being performed under the authority of Title II of the Communications Act of 1934 and under the appropriate state telecommunications authority granted to Verizon NJ by the Board and under chapters 3 and 17 of the Department of Public Utilities Act of 1948.** The FTTP network uses fiber optic cable and optical electronics to directly link homes to the Verizon NJ networks."

12) Virtually, No one was notified about these previous network changes in any meaningful way.

With all of the jargon in these paragraphs explaining the requirements that are in place so that there is proper notification of the parties involved,

We find -- Garbage, Garbage, Garbage. There is no proof that the FCC actually investigated why no one had objections when the FCC put out the notice for copper retirement.

Brendan Carr's press release claims that no one, out of 400 filed network retirements had any comments.

"Adopts an order that waives costly and excessive notice requirements in cases where they provide no demonstrable benefit. In fact, over the past two years, the FCC has processed more than 400 network change disclosure filings and not once has the FCC received a comment in opposition."

This game is rigged. The FCC provides no survey or proof that their methodology to tell customers they are about to be disconnected actually worked.

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But, our research, based on 40 years of consumer and small business surveys, knows that putting a link on a web site that no one ever goes to, expecting the public to understand who the FCC is, is ludicrous.

This excerpt, shows that their methodology is being waived because it is too burdensome -
- The incumbent LEC is actually the state telecommunications public utility that the FCC or the companies fail to disclose .

But this list of obligations and notices shows just how far the FCC will go to get rid of regulations to allow the companies to walk all over our customer rights.

We want the FCC to show America proof that the 400 **network change disclosure filings** gave the customers ample notification -- Based on the FCC's statements, the FCC failed the public.

This cut from the document

- **FCC CONCLUSION:** We hereby waive, for a period of two years, all filing requirements with the Commission that are imposed by the network change disclosure rules, as discussed below.

But then we get the largest piece of regulatory con you will come across-- The redefinition of the actual requirements so that if the service doesn't work -- close enough.

This is not one order but a collection of steps that are strip mining the rights of due process and getting to do what the company wants -- screw the community.

This order says that the substitution product can be "similar", "in the totality" so then the company doesn't have to execute some basic tests.

"We clarify that a technology transition discontinuance applicant that elects to "show[], based on the totality of the circumstances," that a replacement service has substantially similar network performance and availability as the service being discontinued need not conduct the performance testing described in the *2016 Technology Transitions Order* and its Technical Appendix. By contrast, an applicant that elects to "certify[]"—rather than "show[]"—that a replacement service has substantially similar network performance and availability must follow the testing described in the *2016 Technology Transitions Order* and its Technical Appendix. This clarification is consistent with the *2016 Technology Transitions Order*, which distinguishes between "performance testing" and "a demonstration based on the totality of the circumstances" and made clear that a technology transition discontinuance applicant could choose *either* approach

Similar Performance? "Totality of the circumstances"; "Substantially similar" -

This is a 'best efforts' attempt that if that crap wireless doesn't work then they warned the person -- because it was similar to a working e911 call or the health alert never connected to call the ambulance, but was close.

Conclusion: This game is rigged and those who have a conscience need to dig deeper to understand how you were misled and deceived.

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In our Delete, Delete, Delete Comments, we expose that at the core of America's communications is a rotten apple, and we present documented proof that the financial accounting, USOA regulations have been manipulated so that the entire state telecommunications utility is being dismantled illegally, and the local phone networks -- have been illegally charged for expenses that it did not incur, and rates increases on customers, claiming that it was losing money when in fact, the subsidiaries have failed properly to pay for the use of the networks. They are using the utility as a cash cow to illegally fund wireless.

So why is that it that overseas communications prices are fraction of what we pay? The creation of made up junk fees, has been an outcome because there is no serious competition.

Verizon wireless is a resale product to Comcast, Spectrum and Cox, under their brand name, but the wholesale prices are controlled by Verizon. And since Verizon is in bed with the cable companies they have monopolies on some parts, a duopoly on another. But AT&T and Verizon appear to be doing identical financial manipulations, using their associations as the sales people.

For the IRREGULATORS
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