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Sent: Tuesday, May 19, 2026 2:13 PM
To: Nicole Ongele <Nicole.Ongele@fcc.gov>; PRA <PRA@fcc.gov>
Subject: [EXTERNAL]: Information Collection Being Reviewed by the Federal Communications Commission

Federal Communications Commission
Office of the Secretary
Re: OMB Control No. 3060–0298 – Part 61, Tariffs (Other than the Tariff Review Plan)

To Whom It May Concern:

I submit this comment in opposition to the proposed revision and renewal of the information collection requirements associated with OMB Control Number 3060–0298 concerning Part 61 tariff and reporting obligations.

While the Commission states that this collection is necessary to ensure that telecommunications services are offered in a “just and reasonable” manner, the proposed continuation and expansion of these reporting obligations impose substantial compliance burdens on carriers without sufficient evidence that the collection materially improves consumer protection, competition, or regulatory efficiency.

The Commission estimates an annual burden of 170,314 hours across 3,756 respondents. This is an extraordinary administrative burden, particularly for small and mid-sized telecommunications providers that lack dedicated regulatory compliance departments. The Commission’s notice acknowledges the need to reduce burdens on entities with fewer than 25 employees, yet the proposal fails to identify any meaningful exemptions, streamlined filing mechanisms, or safe harbors for smaller providers.

In practice, these reporting and tariff-related obligations disproportionately favor larger incumbent carriers that possess the legal, accounting, and compliance infrastructure necessary to absorb ongoing regulatory costs. Smaller competitive providers, VoIP operators, rural carriers, and emerging IP-enabled service providers face significantly higher relative costs. This risks suppressing competition and innovation in communications markets that the Commission has historically sought to open and modernize.

The Commission also references “Access Arbitrage” and “Access Stimulation” concerns as justification for continued information collection. However, the FCC already possesses substantial enforcement authority under Sections 201, 202, 208, 502, and 503 of the Communications Act. Broad industry-wide reporting mandates should not be used as a substitute for targeted enforcement against demonstrably abusive actors. Imposing expansive disclosure obligations on compliant providers because of isolated abuses elsewhere in the industry is neither narrowly tailored nor economically efficient.

Additionally, the telecommunications market has evolved substantially since many of these tariff-related rules were originally adopted. Large portions of the industry now operate in highly competitive, IP-based, and detariffed environments. Maintaining legacy reporting structures designed for monopoly-era telecommunications regulation risks perpetuating outdated administrative frameworks that no longer reflect modern network architecture or business models.

Beyond the direct administrative burden, the expansion of carrier reporting and identity-linked telecommunications requirements raises serious privacy and civil liberties concerns. Increasingly, consumers are being required to present government-issued identification or provide extensive personal information simply to obtain access to basic communications services. Telephone and internet access are now essential utilities necessary for participation in modern economic, educational, political, and social life.

Mandating identification for communications access creates substantial risks including:

1. Increased exposure of sensitive personal information through data breaches and unauthorized disclosures;
2. Expanded opportunities for surveillance, tracking, and profiling of lawful communications activity;
3. Chilling effects on anonymous speech, whistleblowing, journalism, and political organizing;
4. Exclusion of vulnerable populations, including individuals without government-issued identification, undocumented persons, unhoused individuals, victims of domestic violence, and others seeking confidential communications access;
5. Creation of centralized databases linking identities to communications activity that may later be used for purposes unrelated to the original justification for collection.

The Commission should carefully consider whether forcing carriers to collect, retain, or disclose additional identifying information is compatible with longstanding American principles protecting anonymous expression and private communications. Any expansion of such practices should be subject to strict necessity standards, narrow tailoring, data minimization requirements, and meaningful oversight safeguards.

For these reasons, I respectfully urge the Commission and the Office of Management and Budget to reject the proposed information collection revision under OMB Control No. 3060–0298.