

Wireless Roundup (November 2025)

November 3, 2025

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Government Shutdown

FCC Continues to Suspend Most Operations During Government Shutdown. As the government shutdown continues, Federal Communications Commission (FCC or Commission) operations remain significantly impacted. Key licensing databases continue to be down; however, the Network Outage Reporting System (NORS), Disaster Information Reporting System (DIRS), and Electronic Comment Filing System (ECFS), along with certain other systems, remain accessible.

Please note that most comments and filing deadlines remain tolled during the shutdown, with the same few exceptions that the Commission previously announced. While the FCC continues to circulate and vote on items at its monthly meetings, FCC leadership has acknowledged that fewer items than expected were circulated for November, and this trend could continue into future months if the shutdown persists. FCC guidance on the shutdown can be found [here](#) and [here](#). Wiley's most recent client alert on the shutdown can be found [here](#).

Key Wireless Deadlines

FCC Invites Comment on Revising and Streamlining NEPA Rules: The FCC released this Notice of Proposed Rulemaking (NPRM) in response to recent amendments to the National Environmental Policy Act (NEPA) and Executive Order 14154, *Unleashing American Energy*, which, among other things, directed agencies to “prioritize efficiency and certainty over any other objectives” in implementing NEPA. In light of these changes, the NPRM seeks comment on revising the FCC’s rules implementing NEPA and other environmental review processes. Specifically, the Commission encourages commenters to weigh in on how the FCC can streamline its environmental review processes, promote efficiency, and encourage the deployment of telecommunications infrastructure. The NPRM also invites commenters to identify what parts of the FCC’s environmental rules may now be unnecessary and should be deleted, recognizing that some rules are entwined with the FCC’s National Historic Preservation Act framework as well. Before the government shutdown, reply comments were set to be due October 3. **Current FCC guidance suggests comments will be due on the next business day after normal operations resume.**

Commission Proposes Elimination of Rate Regulation and Tariffing Obligations for BDS Provided by ILECs: In this NPRM and third Further Notice of Proposed Rulemaking (FNPRM), the Commission solicits comments on proposals to eliminate certain regulations applicable to business data services (BDS) provided by incumbent local exchange carriers (ILECs). Specifically, the item proposes to eliminate *ex-ante* pricing regulations and tariffing obligations for end user channel termination services provided by ILECs and seeks comment on deregulating and detariffing rates charged for transport services provided by rate-of-return carriers. Alternatively, the Commission invites comments on general updates to the Commission’s regulatory framework and competitive market tests to “better align those tests with current market conditions based on current data.” Before the government shutdown, comments were set to be due October 6 and reply comments were set to be due October 20. Current FCC guidance suggests comments will be due on the next business day after normal operations resume.

FCC Solicits Feedback on Wide-Ranging Proposals for Emergency Alerting Systems: In this NPRM, the FCC invites comment on a wide range of topics related to the nation’s emergency alerting systems, including the Wireless Emergency Alerts system and Emergency Alert System. Many questions in the NPRM are high-level, inviting commenters to discuss, among other subjects: (1) the potential opportunity for non-government entities to participate in emergency alert distribution; (2) the possibility of implementing video-rich content in emergency alerts, including videos from the President; and (3) opportunities for the Commission to improve the number of devices receiving emergency alerts, including a wide array of consumer electronics that currently do not receive alerts. Before the government shutdown, reply comments were set to be due October 10. Current FCC guidance suggests reply comments will be due on the next business day after normal operations resume.

Commission Invites Comment on Removing TRS ASCII Compatibility Requirements: In this NPRM, the Commission proposes amending its rules to eliminate the requirement that traditional, text telephone-based telecommunications relay services (TRS) be capable of communicating in American Standard Code for Information Interchange (ASCII) format. Finding that usage of the ASCII format in modern communications

network is minor, the Commission invites comment on its proposal to remove the requirement, with the Commission tentatively concluding that maintaining the rule will not serve the Commission's mandate under Section 225 to make TRS available to the largest extent possible, and in the most efficient manner. Commenters are also encouraged to weigh in on the Commission's tentative findings that elimination of the rule will outweigh any costs imposed. Before the government shutdown, reply comments were set to be due October 14. Current FCC guidance suggests reply comments will be due on the next business day after normal operations resume.

Commission Invites Comment on Necessity of Current Slamming and Truth-In-Billing Rules: In this NPRM, the Commission takes a look at its slamming and Truth-in-Billing rules, which prevent telephone service providers from charging wireline telephone customers for local, local toll, or long-distance service without customer permission and lay out requirements for billing transparency for telephone service, respectively. Acknowledging that the goals of the rules are "simple and commonsense," the NPRM nonetheless acknowledges that implementation has produced "complicated, highly prescriptive, and outdated regulations that may stifle innovation without giving consumers much in the way of additional protection." As such, the Commission invites comment on the necessity of the rules and on measures for modernizing and simplifying the implementation of slamming and Truth-in-Billing rules. Before the government shutdown, reply comments were set to be due October 21. Current FCC guidance suggests reply comments will be due on the next business day after normal operations resume.

FCC Solicits Input on Proposals to Reduce Barriers to Network Improvements and Service Changes: In this NPRM, the Commission proposes a variety of deregulatory measures designed to encourage telecommunications providers to "build, maintain, and upgrade their networks" to provide the maximum benefit to consumers, specifically by amending the FCC's discontinuance rules. In particular, the NPRM proposes to eliminate all filing requirements in the FCC's current network change disclosure rules, consolidate the current rules implementing the FCC's discontinuance regime pursuant to Section 214 into one rule, and remove existing discontinuance requirements to reduce the regulatory burden on providers transitioning from legacy networks. Commenters are invited to weigh in on these proposals, comment on the Commission's discontinuance regime more broadly, and identify opportunities for further deregulation. In several places the NPRM seeks comment on the availability and adequacy of wireless and satellite alternatives to legacy voice and data services. Before the government shutdown, reply comments were set to be due October 27. Current FCC guidance suggests reply comments will be due on the next business day after normal operations resume.

FCC Solicits Input on STIR/SHAKEN Extension Categories; Triennial Review: The FCC's Wireline Competition Bureau released a Public Notice requesting comment on two recurring statutory obligations under the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act. *First*, the Bureau asks whether two existing extensions based on "undue hardship" granted by the FCC for implementation of the STIR/SHAKEN caller-ID authentication framework should be revised or extended for: (1) providers that cannot obtain the Service Provider Code token necessary to participate in STIR/SHAKEN, and (2) small voice service providers that originate calls via satellite using North American Numbering Plan (NANP) numbers. *Second*, the Bureau seeks comment on the second triennial assessment of the efficacy of the STIR/SHAKEN caller ID

authentication framework as a tool to combat illegal robocalls. Before the government shutdown, comments were set to be due October 3 and reply comments were set to be due October 20. Current FCC guidance suggests comments will be due on the next business day after normal operations resume.

November Open Meeting

Upper C-Band NPRM: On October 30, FCC Chairman Brendan Carr released the tentative agenda for the November Open Meeting. Notably, Carr announced that the Commission will consider an NPRM exploring options to free up between 100 and 180 megahertz of Upper C-band spectrum for auction and proposing bidding procedures and licensing, operating, and technical rules. The draft NPRM can be found [here](#).

Reversing CALEA Declaratory Ruling: The Commission will also consider an order that would rescind a previous Declaratory Ruling interpreting the Communications Assistance for Law Enforcement Act (CALEA) as imposing substantive cybersecurity requirements on telecommunications carriers. The draft Order on Reconsideration can be found [here](#).

Modernizing the Telecommunications Relay Services (TRS): The FCC will consider an NPRM seeking comment on reform proposals that would facilitate TRS's transition from legacy analog services to IP-based alternatives. The draft NPRM can be found [here](#).

Direct Final Rule in *Delete, Delete, Delete*: As a part of the *Delete, Delete, Delete* proceeding, the FCC will also consider a Direct Final Rule that would move to delete approximately 21 rules and requirements as part of the Commission's efforts to modernize its regulatory framework. The draft Direct Final Rule can be found [here](#).

Upcoming Meetings and Events

- **FCC Open Meeting:** The next FCC Open Meeting, discussed above, is scheduled for **November 20**.
- **FTC's 18th Annual Microeconomics Conference:** The Federal Trade Commission's (FTC) Bureau of Economics and the Tobin Center for Economic Policy at Yale University will host the 18th Annual FTC Microeconomics Conference on **November 13-14** in Washington, DC. Conference details can be found [here](#).

Cyber Corner

CMMC Implementation Rule Published, Setting Effective Date for Program Kickoff. On September 10, the U.S. Department of Defense published a Final Rule containing the Cybersecurity Maturity Model Certification (CMMC) program contract clauses. The Final Rule is effective **November 10**.

Other Wireless Developments

FCC Adopts NPRM to Overhaul and Modernize Part 25 Satellite Rules with New Part 100 Replacement. On **October 28**, the FCC adopted an NPRM that proposes to replace existing satellite communications rules in Part 25 with an entirely new Part 100. The proposal would consolidate and reorganize existing rules, delete unnecessary or outdated ones, and introduce new frameworks meant to streamline the licensing processes for satellites and earth stations. Comments will be due **45 days after** Federal Register publication, with reply comments due **75 days after** Federal Register publication.

Commission Approves NPRM Seeking More Intensive Use of 24+ GHz Bands Shared between UMFUS and FSS. On **October 28**, the Commission adopted a Notice of Proposed Rulemaking that proposes comprehensive reforms to siting rules for earth stations in the Upper Microwave Flexible Use Service (UMFUS) bands. The proposal also calls for input on how the Commission can encourage more intensive use of the UMFUS bands, which are shared between terrestrial and Fixed-Satellite Service (FSS) operators. Comments will be due **30 days after** Federal Register publication, with reply comments due **60 days after** Federal Register publication.

FCC Enacts Direct Final Rule to Delete 400 Obsolete or Unnecessary Wireless-Related Rules. As part of its *Delete, Delete, Delete* proceeding, the FCC approved a Direct Final Rule that will delete approximately 400 predominantly wireless-related rules considered to be obsolete, expired, duplicative, unnecessary, or no longer used in practice. Comments will be due **20 days after** Federal Register publication, and the Direct Final Rule will take effect **60 days after** Federal Register publication unless the FCC receives significant adverse comments to the rule.

Supply Chain Security Equipment Authorization Order and FNPRM Approved at October Open Meeting. At the October 28 Open Meeting, the Commission adopted a Report and Order (R&O) and FNPRM in the Secure Equipment Act proceeding. The Order (1) clarifies that equipment on the Covered List includes modular transmitters; (2) prohibits authorization of devices that include covered modular transmitters; (3) provides a procedure to limit previously granted authorizations to prohibit continued marketing and importation; and (4) clarifies the term “produced by” as used in the FCC’s Covered List rules. The FNPRM seeks comment on expanding the universe of device components that trigger Covered List exclusions, the definition of “critical infrastructure” as used in the Covered List, and measures to curb the availability of unauthorized equipment in the U.S. market. Comments on the FNPRM will be due **30 days after** Federal Register publication and reply comments **45 days after** publication.

Did You Know?

Wiley launched a Trump Administration Resource Center and Resource Guide to track Executive branch priorities during the second Administration of President Trump. With Wiley’s deep-rooted understanding of Washington and today’s evolving regulatory landscape, the Resource Center and Resource Guide provide critical insights, actionable intelligence, practical solutions, and guidance across key industries to help businesses stay ahead of the curve and manage challenges in 2025 and beyond.

In addition, Wiley recently launched a Trump Administration Tariff Tracker. It offers a high-level, real-time overview of the latest developments under the Trump Administration, organized by category and updated as new actions unfold.

Wiley created an AI hub, All Things AI, to showcase thought leadership and insights on AI legal and regulatory matters.

Wiley launched a Federal Infrastructure Resource Center, highlighting the federal government's initiative to invest in our nation's infrastructure, including the \$42 billion Broadband Equity Access and Deployment (BEAD) Program.

Wiley created a Sanctions and Export Controls Resource Center, which hosts our latest insights related to sanctions, export controls, digital currency, cybersecurity and privacy, and other issues surrounding Russia's invasion of Ukraine.

Check out our Consumer Protection Download Newsletter; the latest edition is available [here](#).

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FCC Releases Draft Proposal for Sweeping Space Modernization Reforms

California Finalizes Pivotal CCPA Regulations on AI, Cyber Audits, and Risk Governance

FCC Tees Up Next Gen TV Transition for October Open Meeting

Day 7 of the Government Shutdown: Updates on Activities of Selected Departments and Agencies

Fraud and Scam Prevention Series: Report Identifies Broad Problems and Offers Complex Recommendations

FCC Approves Broadcast Ownership NPRM, Advancing 2022 Quadrennial Review