

Wireless Roundup (October 2025)

October 1, 2025

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Government Shutdown

FCC Suspends Most Operations During Government Shutdown. The federal government shutdown that took effect October 1, 2025 has led the FCC to furlough ~88% of its workforce and suspend non-essential functions with exceptions for activities funded through sources other than lapsed appropriations. Licensing services and equipment authorization activities have ceased. Certain spectrum auction, supply chain reimbursement, and Universal Service Fund disbursement activities will continue with minimal staffing. Activities necessary to protect life and safety, among other essential activities, will continue. Notably, the Network Outage Reporting System (NORS), Disaster Information Reporting System (DIRS), and Electronic Comment Filing System (ECFS), among other databases, will remain available.

Please note that comment and filing deadlines are tolled during the shutdown, with a few important exceptions. These include deadlines for responses in enforcement matters, NORS and DIRS filings, certain spectrum auction filings, and responses to Broadband Data Collection (BDC) challenges, which all remain due as scheduled. Unexpected deadlines falling during the shutdown will be extended to the day after the resumption of normal operations, though past

practice suggests the deadlines could be further extended to at least two business days after the agency reopens upon further notice. We provide the original deadlines below but note that FCC notices for bureau-specific guidance should be monitored and preparations for delays in approvals and regulatory actions should be made. FCC guidance on the shutdown can be found [here](#) and [here](#). Wiley's 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**.

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 FCC 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**. Reply comments were set to be due **October 20**.

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 of the questions asked 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**.

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 minuscule, 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**.

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**.

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, as well as to 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**.

FCC Solicits Input on STIR/SHAKEN Extension Categories; Triennial Review: The FCC's Wireline Competition Bureau released a Public Notice seeking 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: (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 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**. Reply comments were set to be due **October 20**.

OSTP Seeks Input on Federal Laws Hindering Artificial Intelligence (AI): As contemplated in the July 23 AI Action Plan, the White House Office of Science and Technology Policy (OSTP) released on Request for Information (RFI) seeking comment on federal statutes and regulations that “unnecessarily hinder the development, deployment, and adoption” of AI technologies within the United States. Before the government shutdown, comments were set to be due **October 27**. See here for Wiley’s overview of the RFI.

Upcoming Meetings and Events

- **FCC Open Meeting:** The next FCC Open Meeting is scheduled for **October 28**. Meeting details can be found here. The tentative agenda will be posted approximately three weeks prior to the meeting.
- **ISPAB October 2025 Meeting:** The Information Security and Privacy Advisory Board (ISPAB) is scheduled to meet on **October 22-23** at the National Institute of Standards and Technology (NIST) National Cybersecurity Center of Excellence (NCCoE). More information can be found here.

Cyber Corner

- **NIST CSF 2.0 Webinar:** NIST plans to hold its next event in its Cybersecurity Framework (CSF) 2.0 Webinar Series, titled “Deep-Dive into the CSF 2.0 Govern Function to Improve Cybersecurity,” on **October 7**. More information can be found here.
- **NIST NCCoE Cybersecurity Workforce Event:** The NIST NCCoE announced that it will hold a quarterly Cybersecurity Connections event and networking lunch on **October 14**. More information can be found here.
- **NIST Semiconductor Workshop:** NIST plans to host an in-person Semiconductor Traceability and Provenance Workshop on **October 21**. More information can be found here.
- **SUSHI@NIST Workshop:** NIST plans to hold its SUSHI Workshop: Sustainable Hardware Security @ NIST titled “Rolling Next-Generation Secure Hardware into Standards” on **October 22-23**. The workshop will focus on enhancing hardware security for national defense and emerging technologies. More information can be found here.

Other Wireless Developments

FCC Adopts Prison Jamming Proposal: On September 30, the FCC adopted a Third Further Notice of Proposed Rulemaking seeking comment on a proposed framework to authorize radio frequency jamming solutions to curb contraband wireless device operation in correctional facilities. Comments will be due 30 days after Federal Register publication, with replies due 45 days after Federal Register publication.

NTIA Spectrum Symposium: The National Telecommunications and Information Administration (NTIA) held its 2025 Spectrum Symposium on **September 10**. The event featured remarks and panel discussion from key officials involved in spectrum policy, including Senator Ted Cruz (R-TX), NTIA Administrator Arielle Roth, and FCC Commissioner Olivia Trusty. Roth announced NTIA's identification of the 1675-1680 MHz band for auction and its plan for delivering on the spectrum pipeline mandates in the One Big Beautiful Bill Act. Officials from NTIA, FCC, the Department of War, Federal Aviation Administration, and National Oceanic and Atmospheric Administration discussed their agencies' perspectives on key bands, including 2700-2900 MHz, the Upper C-band (3980-4200 MHz), 4400-4940 MHz, and 7125-7400 MHz, among others.

Did You Know?

Wiley TMT Practice group members Josh Turner, Megan Brown, Sara Baxenberg, Kat Scott, Henry Gola, Kevin Rupy, Diane Holland, Stephen Conley, Kelly Laughlin and Alexandrine de Bianchi will be attending **Mobile World Congress** in Las Vegas on **October 14-15**. Find out conference details [here](#).

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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Preparing for a Potential Government Shutdown

First FASC Order Could Broadly Impact ICT Supply Chains and National Security in Federal Systems

FCC Tees Up 2022 Quadrennial Review Draft NPRM for September Open Meeting

Broadcast FY 2025 Regulatory Fees Due by September 25, 2025

FCC to Provide Expanded Major Change and New Station Opportunities for Class A, LPTV, and TV Translator Stations

October 1, 2025 FCC EEO Deadlines for Stations in FL, PR, VI, IA, MO, AK, GU, HI, OR, AS, and WA