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NEWSLETTER

Wireless Roundup (September 2025)
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August 29, 2025

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Key Wireless Deadlines
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'Delete, Delete, Delete' Deadline to Oppose Coming Soon:
Following Federal Communications Commission (FCC or Commission)
Chairman Carr's *Delete, Delete, Delete* Public Notice, this Direct Final
Rule (DFR) eliminates several of the rules that were targeted for
deletion by commenters without receiving significant adverse
comments, forgoing standard notice-and-comment rulemaking
procedures. The DFR removes 71 rule provisions that it states
"regulate obsolete technology, are no longer used in practice by the
FCC or licensees, or are otherwise outdated or unnecessary."
Comments are due **September 9**. If no significant adverse comments
are received, the rules identified in the DFR will be removed **October
20**.

**FCC Seeks Comment on Expanded TCB and Equipment
Authorization Rules:** In this Report and Order (R&O) and Further
Notice of Proposed Rulemaking (FNPRM), the FCC adopts new rules
to limit ownership of telecommunications certification bodies (TCBs),
test labs, and other facilities by foreign adversaries, while also
seeking comment on further expanding those rules. In particular, the
Commission proposes expanding the prohibition on ownership of
TCBs, test labs, and laboratory accreditation bodies by foreign
adversary entities to include facilities that are subject to the
jurisdiction of a foreign adversary country, as well as seeking

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comment on related issues. Reply Comments are due **September 15**.

Commission Requests Input on Updates to NG911 Rules: In this FNPRM, the FCC solicits feedback on proposed changes to the Commission's rules ensuring the transition from legacy 911 networks to internet protocol (IP)-based Next Generation 911 (NG911) networks. Specifically, the FNPRM proposes to update the definition of "covered 911 service provider" contained in the Commission's existing 911 reliability rules, to update the reliability standards for providers of "critical" NG911 functions to ensure the reliable delivery of 911 traffic to NG911 delivery points, and to establish NG911 interoperability requirements for interstate transfer of 911 traffic between Emergency Services IP Networks. Finally, the FCC also seeks comment on proposals to modify the certification and oversight mechanisms in the existing 911 reliability rules and proposals to facilitate local 911 authorities' acquisition of reliability and interoperability certifications directly from covered 911 service providers. Reply Comments are due **September 17**.

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. The NPRM seeks comment on revising the FCC's rules implementing NEPA and other environmental review processes in light of these changes. 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. Comments are due **September 18**. Reply comments are due **October 3.**

Commission Invites Comment on Necessity of Current Slamming and Truth-In-Billing Rules: In this NPRM, the Commission takes a look at its own 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. Comments are due **September 22**. Reply Comments are due **October 21**.

Commission 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. Comments are due **September 25**. Reply Comments are 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 ASCII format. Finding that usage of the ASCII format in modern communications network is miniscule, 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. Comments are due **September 26**. Reply Comments are due **October 14**.

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 transition 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. Comments are due **September 29**. Reply Comments are due **October 27**.

STIR/SHAKEN Update

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 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. Comments will be due 30 days after publication in the Federal Register, and reply comments will be due 45 days after publication in the Federal Register.

FCC's STIR/SHAKEN Third-Party Authentication Rules Effective September 18: The FCC's third-party authentication rules were recently published in the Federal Register include establishing an effective date September 18, 2025. The rules authorize providers with a STIR/SHAKEN implementation obligation to engage

third parties to perform the technological act of digitally "signing" calls, so long as: (1) the provider with the implementation obligation makes the "attestation-level" decisions for authenticating caller ID information; and (2) all calls are signed using the certificate of the provider with the implementation obligation (i.e., not the certificate of a third party). The rules also explicitly require all providers with a STIR/SHAKEN implementation obligation to obtain a Service Provider Code (SPC) token from the Secure Telephone Identity (STI) Policy Administrator and present that token to a STI-Certificate Authority to obtain a digital certificate. Finally, the rules include recordkeeping requirements for third-party authentication arrangements to enable the FCC to monitor compliance with and enforce its rules.

Upcoming Meetings and Events

- **FCC Open Meeting:** The next FCC Open Meeting is scheduled for **September 30**. Meeting details can be found here. The tentative agenda will be posted approximately three weeks prior to the meeting.

- **2025 NTIA Spectrum Policy Symposium:** The National Telecommunications and Information Administration (NTIA) will host a public spectrum policy symposium on **September 10**. Meeting information can be found here.

- **FCC CPAAC Meeting:** The FCC's Consumer Protection and Accessibility Advisory Committee (CPAAC) will hold its first meeting of the current term on **September 10**. CPAAC information can be found here, and meeting details can be found here.

- **CSRIC IX Meeting:** The Communications Security, Reliability, and Interoperability Council (CSRIC) IX will meet to provide recommendations to the FCC regarding best practices the agency can implement on **September 25**. Meeting information can be found here.

Cyber Corner

- **NIST NCCoE Cyber AI Profile Virtual Working Sessions:** The National Institute of Standards and Technology (NIST) National Cybersecurity Center of Excellence (NCCoE) announced that it will hold virtual working sessions regarding the NIST Cybersecurity Framework Cyber Artificial Intelligence (AI) Profile:

  - The "Thwarting AI-enabled Cyber Attacks" working session will be held on **September 2**. More information can be found here.

- **The Federal Cybersecurity & Privacy Professionals Forum:** The Federal Cybersecurity & Privacy Professionals Forum sponsored by NIST will hold its quarterly meeting to discuss issues and items related to protecting non-national security systems on **September 16.** More information can be found here.

- **NIST FISSEA Fall Forum:** The NIST Federal Information Security Educators (FISSEA) will hold its "Collaborative Cybersecurity: Building a Community of Awareness and Action" quarterly forum on **September 30**. More information can be found here.

- ***CISA Seeks Comment on SBOM Minimum Elements (open for comment)***: On **August 22**, the Cybersecurity and Infrastructure Security Agency (CISA) published in the Federal Register a Request for Information seeking comment on draft guidance, "2025 Minimum Elements for a Software Bill of Material (SBOM)." The guidance is an update to the 2021 guidance originally published by NTIA. The updates are intended to address "expanded capabilities and functionalities of SBOM tooling" and "increased maturity of SBOM implementation." Comments are due **October 3**.

- ***NIST Releases "Control Overlays" for AI Systems Concept Paper***: On **August 14**, NIST released a concept paper, *SP 800-53 Control Overlays for Securing AI Systems*, which lays out NIST's plans to build out AI use cases for which to develop tailored 800-53 controls. NIST is accepting comments on the concept paper and plans to release draft use cases for comment in early 2026.

- ***NIST Unveils Consortium for SSDF Guidance and Hosts Webinar August 27***: On **July 30**, NIST announced the creation of a "Software Supply Chain and DevOps Security Practices Consortium" and released for comment a draft project overview for "DevSecOps" practices that will provide example implementations of the practices laid out in the Secure Software Development Framework (SSDF). Comments are due **September 14**. NIST also held a webinar to discuss the SSDF guidance development process on August 27.

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 Enforcement Action Removes Over 1,200 Providers from Robocall Mitigation Database

FCC's Looming STIR/SHAKEN Requirements May Raise USF Obligations and Exposure for Certain Providers

FCC Considers Significant Overhaul of Nation's Alert and Warning Systems

Cyber Regulatory Harmonization: The Prospects and Potential Impacts of Current Efforts

Annual Update to ETRS Form One Due By October 3, 2025