

# FCC Proposal Intended to Speed the Industry Transition to IP Interconnection

October 20, 2025

The Federal Communications Commission (FCC) has released a draft notice of proposed rulemaking on advancing IP interconnection, scheduled to be considered at the October 28 FCC open meeting. The proposal would sunset at the end of 2028 the requirements for incumbent local telephone companies to provide interconnection in the analog time division multiplexing (TDM) format on demand and collocation for the purpose of interconnection to other local exchange carriers (LECs).

If the current proposal is adopted without any change, incumbent carriers no longer would have a specific obligation to interconnect with other carriers in TDM – the default format for telephone calls for many decades – once the sunset date passes. The elimination of this obligation could impact the transmission of voice calls in general and connections to 911.

The core proposal is to sunset TDM interconnection requirements by using the FCC's authority to forbear from requirements under the Communications Act if it determines those requirements are not necessary to protect competition or consumers. The forbearance would affect the obligation of incumbents to interconnect at any technical feasible point and the obligation to allow other carriers to place their facilities in incumbent switching locations. It would not affect a separate provision, known as Section 251(a), that requires all carriers to interconnect with one another on reasonable terms and conditions, but the FCC also will consider whether that provision includes interconnection with voice over IP (VoIP) telephone services, and, if so, how it should be applied.

The notice acknowledges that the proposal to sunset the interconnection and collocation requirements raises a range of other issues, particularly how interconnection will occur and be regulated. It asks for comments on these issues, including the following:

- **Impact on 911:** The impact of eliminating interconnection requirements on 911 services, particularly in light of the ongoing transition to next generation 911 and the need for current 911 interconnection arrangements to stay in place until public safety answering points (PSAPs) choose to convert to next generation services.
- **Current industry practices:** Factual information about IP interconnection.
- **Interconnection requirements after Section 251(c)(2) sunsets:** What new requirements should be in place following sunset of the TDM interconnection requirement, including whether the FCC should adopt a duty to interconnect for IP traffic or negotiate IP interconnection in good faith and where points of interconnection should be located if the current requirements no longer are in place.
- **Legal authority:** Its authority to adopt rules governing IP interconnection, including interconnection between providers of VoIP, and whether Section 251(a) or Section 201 interconnection, which impose the same requirements on all carriers, is an appropriate path for IP interconnection.
- **Telephone numbering:** If there should be any changes to the rules under which VoIP providers get access to telephone numbers.
- **Interconnection via the public internet:** The extent to which interconnection via the public internet is acceptable, and particularly whether it would produce acceptable call quality.

Comments and reply comments on the notice would be due 30 and 60 days after Federal Register publication, which likely would occur before the end of the year. Cooley professionals can assist in evaluating what steps the FCC may take in this proceeding and the potential impact of the proposed changes on your business.

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