



January 30, 2026

Rep. Kathleen James, Chair
Committee on Energy and Digital Infrastructure
Vermont State House
115 State St
Montpelier, VT 05633

Rep. R. Scott Campbell, Vice Chair
Committee on Energy and Digital Infrastructure
Vermont State House
115 State St
Montpelier, VT 05633

Rep. Laura Sibilila, Ranking Member
Committee on Energy and Digital Infrastructure
Vermont State House
115 State St
Montpelier, VT 05633

RE: Opposition to DR-26-0726 – An act relating to copper-based to fiber-based network transitions and backup power requirements for VoIP service

Chair James, Vice Chair Sibilila and Ranking Member Sibilila

On behalf of CTIA®, the trade association for the wireless communications industry, I write in opposition to this bill.

We recognize the importance of consumer access to 9-1-1 emergency services. However, the Federal Communications Commission (FCC) is the proper venue to consider how to regulate voice over Internet Protocol (VoIP) to promote such access, and the FCC has already considered and addressed the issues in this bill.

This bill could upset the national regulatory framework established by the FCC for wireless and VoIP services. As VoIP is an interstate service subject to exclusive FCC jurisdiction, the Vermont Public Utility Commission (PUC) concluded in 2021 that it should not pursue VoIP regulation. The Vermont PUC found that attempting to impose heavy-handed requirements on VoIP would conflict with the FCC's policy of targeted VoIP regulation. We concur: Interconnected VoIP is and should be governed solely at the federal level through the FCC.

On that point, the FCC has already addressed the issues raised in this bill. For example, as the bill recognizes, the federal 24-hour battery back-up (BBU) requirement for interconnected VoIP services expired last September. The FCC correctly determined that a self-executing sunset of the BBU requirement was appropriate because voice service consumers—many of whom are wireless-only—have competitive choices to reach 9-1-1 emergency services. While the FCC's BBU requirement for VoIP services expired, the FCC's rules continue to require that providers of voice services notify their subscribers about transitions away from legacy landline telephone service. The FCC is presently and comprehensively reviewing those rules to ensure that they promote competition and consumer choice while preserving access to 9-1-1 and other essential communications services.



A state law imposing additional obligations on providers transitioning their voice services from legacy voice copper lines to VoIP would impermissibly conflict with the FCC's approach, which the FCC has established pursuant to authority granted by Congress. In addition, the FCC's comprehensive approach occupies the field of regulation in this area, precluding state regulation.

Rather than creating a patchwork of overlapping state requirements and needless compliance costs, Vermont should continue to foster a national regulatory framework for wireless and VoIP services that encourages investment and innovations that will help to ensure those services are available to Vermonters when they need it most.

For these reasons, CTIA opposes the bill.

Sincerely,

A handwritten signature in black ink that reads "Jeremy Crandall". The signature is written in a cursive, flowing style.

Jeremy Crandall
Assistant Vice President
State Legislative Affairs