

CCA 2026 ADVOCACY AGENDA

UNIVERSAL SERVICE FUND

Many CCA members rely on the Universal Service Fund (USF) to deploy, maintain, and upgrade networks in hard-to-serve and high-cost areas that may not otherwise present a business case for deployment. CCA continues to prioritize a sufficient and predictable USF for rural America that rewards carriers for serving subscribers in high-cost areas.

USF Reform/Contribution Reform. Congress continues to explore policies to modernize the USF, and a bipartisan, bicameral Working Group is creating a revamped policy framework. CCA will engage in stakeholder discussions and encourage policies that preserve, expand, and protect legacy investments, particularly in rural areas. CCA will also advocate for a stable funding base for the future via meaningful and comprehensive contributions reform, including expanding the base where possible to reflect current and future network uses and minimize financial impacts on CCA member customers. This includes assessment on "big tech" companies including digital advertisers and large streaming providers that ride on communications networks.

Mobile Support/5G Fund. CCA will continue to seek reforms to the FCC's 5G Fund and other federal mobile funding programs to expand and update those programs. CCA will support the status quo until suitable updates occur and oppose implementation approaches that rely on flawed mapping, impose unrealistic obligations, or undermine the business case for rural deployment. CCA will support abeyance of D.C. Circuit litigation challenging the FCC's 5G Fund framework pending more clarity on Congressional next steps.

Operational Expense Support for Rural Wireless Networks. CCA will advocate for action to address the lack of ongoing operational expense (OPEX) support for mobile networks serving rural and high-cost areas. CCA will support individual carrier waiver petitions and urge the FCC and Congress to evaluate broader, programmatic solutions to support reasonable operating and maintenance expenses for mobile facilities to prevent stranding federally supported infrastructure.

Broadband Data Collection. CCA will advocate for federal agencies to comply with the Broadband DATA Act to facilitate the submission of data (including crowdsourced), data challenges, fabric layer challenges, and transparent use of data key to inform policies important to members. CCA will advocate for the FCC to utilize mobile mapping data as opposed to outdoor stationary data for mobile mapping and policymaking related to mobile communications.

Affordability. Affordability support is crucial to ensuring connectivity for low-income consumers in many CCA member service areas. CCA will support efforts to address potential fraud in any affordability program and work to ensure retention of a subsidy program structured to provide stable, sustainable, long-term affordability support for low-income and tribal areas, particularly in the context of the Congressional USF Working Group.

USF Legal and Administrative Stability. Following the Supreme Court’s decision in *Consumers’ Research v. FCC*, CCA will engage with the FCC to preserve continuity, predictability, and funding sufficiency for supported services. CCA will advocate against disruptive, piecemeal changes that undermine investment clarity for rural and competitive providers. CCA will monitor ongoing litigation related to the E-Rate and Rural Healthcare Programs and potentially re-engage if needed to protect the broader USF framework.

INFRASTRUCTURE

The ability to build, upgrade, and maintain networks efficiently is key to connecting consumers and competing. CCA members often serve areas with unique environmental and geographic challenges that complicate infrastructure work. CCA will advocate to better facilitate the deployment of infrastructure by its members and secure policies that spur and support deployment of competitive communications services.

Historic/Environmental Review & Siting Barriers. Siting reform is critical to overcoming barriers to broadband deployment. In 2025, the Administration and the FCC took steps to spur infrastructure deployment by advancing permitting reforms, reducing regulatory uncertainty, and reassessing legacy requirements that slow network investment. CCA will support fast and efficient implementation of reforms, advocate for additional common-sense streamlining measures (e.g., the RAIL Act), and ensure that regulatory processes appropriately account for the unique geographic, environmental, and resource constraints faced by competitive and rural carriers.

Broadband Equity Access and Deployment (BEAD) Program. CCA will support preservation of full state BEAD allocations, retention of “non-deployment funds” for flexible state use, and use of non-deployment funds in ways that advance CCA member interests (e.g., mobility projects, increased tribal connectivity, state/local permitting reform).

Satellite. CCA supports regulatory initiatives to facilitate satellite technology that does not interfere with existing networks as a competitive means to increase connectivity and enhance public safety communications, particularly in unserved rural areas and as additional backhaul alternatives. CCA will advocate for additional flexibility in the FCC’s direct-to-device rules to facilitate use of the technology by non-nationwide competitors.

AI. CCA supports initiatives to advance AI deployment, particularly in rural areas as a means to improve edge connectivity and as an economic development tool (e.g., data centers, rural carriers as anchor tenants). CCA supports federal efforts to prevent a state patchwork of regulations that could stall AI expansion. CCA will advocate policies that do not impede member ability to use AI in their networks and will oppose efforts to include legacy telecom switching infrastructure in AI legislation or to require opt-ins for use of personal information in AI models.

Federal Funding. CCA will continue to educate policy makers about and advocate for technological neutrality in broadband infrastructure programs, encouraging eligibility by established and knowledgeable carriers in funding programs as a means to help ensure successful outcomes.

ReConnect/Farm Bill. CCA will advocate for prioritization of additional connectivity technologies and opportunities as Congressional discussions surrounding reauthorization of the Farm Bill progress and will continue outreach to the Rural Utilities Service (RUS) to encourage increased opportunities for CCA member participation in its programs.

Twilight Towers. CCA will encourage all stakeholders to continue to work together to address Twilight Tower reform and support clarity/minimal regulatory burdens surrounding twilight towers.

SPECTRUM

Spectrum access is crucial for many CCA members' growth and innovation, as wireless and mobile applications are a key driver of the American economy and will be into 6G and beyond. CCA will be a leading advocate for developing sources of new spectrum suitable for members' use. CCA will support policies that promote equitable access to spectrum, including through reasonable aggregation policies, appropriate reserve prices, sufficiently small license sizes, appropriate power levels, bidding credits, etc. CCA will support increased flexibility in existing bands where possible. CCA will also support public/private collaboration and interagency cooperation on spectrum issues.

Auction Policy. The AWS-3 re-auction is scheduled for June 2026, and preparations are underway for the Upper C-Band auction, which by statute must be completed by July 2027. CCA will advocate for auction procedures and frameworks that promote competition. Competitive carriers' spectrum needs often differ from nationwide providers, and spectrum auctions must be designed with a level playing field that facilitates participation so carriers in rural areas have a fair opportunity to access the spectrum they need. CCA will support smaller license areas (e.g., counties, RSAs, BTAs especially in the western U.S.), the use of rural/small carrier set asides, larger bidding credits, and strong spectrum screens.

Long-Term Spectrum Strategy. The FCC’s spectrum auction authority was reinstated through September 30, 2034. Legislation directed the FCC to identify and auction at least 800 MHz of spectrum for commercial wireless use including at least 100 MHz from the Upper C-Band. It also requires NTIA to identify 500 MHz of federal government spectrum for reallocation/auction for full-power commercial or shared use between 1.3- 10.5 GHz. CCA will work within U.S. government spectrum planning processes to make available the most spectrum possible in the bands best suited for CCA members now and into the future, maximizing opportunities for spectrum to be used on an exclusive, full-power, licensed basis for commercial wireless use ideally (or under improved sharing arrangements if necessary).

Lower- and Mid-Band Spectrum. CCA will support efforts to increase availability and flexibility in bands critical to rural coverage, including 600 MHz, lower 3 GHz, mid-band, and other un/under-utilized spectrum suitable for licensed commercial use.

3.5 GHz (CBRS) and Sharing Frameworks. CCA will continue to advocate for increased power levels wherever possible and for increased flexibility in the CBRS band while opposing proposals that would displace existing users or further constrain commercial operations.

Upper Microwave Flexible Use Service (UMFUS). As the FCC considers modernizing the UMFUS framework, CCA will support a more flexible, streamlined licensing and coordination regime that reduces administrative burdens and facilitates greater use of UMFUS spectrum for fixed, backhaul, and other innovative services—particularly in rural and hard-to-serve areas.

FCC Inventory Auctions. Inventory auctions can provide carriers with valuable access to spectrum through re-licensing of returned, cancelled, or idle licenses across multiple bands. CCA will work with the FCC to encourage timely inventory auctions and improved access to secondary market opportunities.

NETWORK POLICY ISSUES/IP TRANSITION

CCA members stretch resources as far as possible to innovate and deploy networks in challenging areas. CCA members often have unique needs, financial and resource constraints, and technical challenges. CCA will continue to advocate for competitive network policies to meet member needs and that are not unduly burdensome.

IP Interconnection. The IP transition and related interconnection challenges remain a significant operational and cost concern for competitive carriers. CCA will continue to engage with the FCC and relevant stakeholders to promote policies and practices that facilitate the IP transition, reduce reliance on outdated interconnection arrangements, prevent anti-competitive activity and outcomes (e.g., ILEC caps on legacy tandems), and account for the unique circumstances faced by carriers operating in remote and high-cost areas.

Robocalls/Robotexts. CCA will continue to promote flexible, scalable robocall mitigating approaches and emphasize parity across the call chain to avoid disproportionate burdens on small carriers.

Nationwide Number Portability. CCA will collaborate with members and industry on any nationwide number portability issues that arise, and CCA will work to increase policymaker awareness of the need for nationwide number portability solutions to address the barrier to subscribers caused by lack of portability. CCA will also work to resolve nationwide number portability issues as part of the pending IP interconnection proceeding at the FCC.

VoLTE Handoff. Seamless transitions between networks are key to consumers, and some CCA members have experienced challenges with VoLTE handoff between carriers resulting in dropped calls which can lead to negative competitive and safety impacts. CCA will work with members and educate/advocate before policymakers on issues faced by competitive carriers to obtain consumer-focused, collaborative industry-led solutions.

Roaming. Consumers expect their devices to connect wherever they live, work, or travel. Nevertheless, competitive carriers often experience technical and business challenges with roaming. CCA will support pro-competitive roaming policies, including VoLTE and 5G roaming, and explore regulatory solutions to the reduction in competitive roaming revenues.

Workforce. The competitive communications industry requires a robust, properly trained workforce for carriers to keep up with innovations, consumer demand, and regulatory requirements. This is particularly true with the unprecedented funding going into infrastructure projects. CCA will engage with the policy makers on communications workforce initiatives to develop a sufficient workforce to meet the demands of all members (e.g., knowledge sharing, apprenticeships).

NETWORK SECURITY

Network security and cybersecurity remain a significant focus for carriers and policymakers as networks and consumer privacy are at growing risk of exploitation. CCA will work to ensure that its members have timely and actionable information and resources needed to protect their networks and customers. CCA will advocate for a cohesive federal mitigation strategy, encourage policymakers to balance the benefits and burdens of proposals, and support streamlining of duplicative regulatory reporting/compliance requirements where appropriate.

Cybersecurity. CCA will support coordinated federal cybersecurity initiatives (e.g., trusted tech), oppose new cybersecurity mandates that lack clear legal authority, and work to ensure any new cybersecurity initiatives balance compliance burdens and potential business impacts with desired regulatory outcomes, do not inadvertently jeopardize security, and allow small and regional carriers sufficient time for compliance. CCA will also work to ensure that any privacy regulation

preserves the ability of carriers and vendors to access data needed to monitor and improve their networks.

Secure and Trusted Communications Networks Reimbursement Program. CCA will work to facilitate member completion of Rip and Replace projects, support reasonable extensions, and work for improvements to the FCC's administration of the Program to ensure it operates smoothly and efficiently.

Supply Chain. CCA will monitor federal supply chain initiatives related to networks and other items of interest to CCA members (e.g., drones), including tariffs and security-related restrictions, etc. and advocate for policies that account for increased costs and limited vendor alternatives faced by smaller carriers.

PUBLIC SAFETY

CCA will advocate for reasonable regulations and technical solutions that do not jeopardize the security of carrier networks or unduly burden members and emphasize the cumulative burdens of regulatory requirements on smaller carriers with significant resource constraints.

Location Accuracy/Location-Based Routing. Carriers are required to implement location-based routing for 911 calls by May 13, 2026. CCA will collaborate with members throughout the implementation process and help address challenges that arise. With respect to future LBR proposals (e.g., relating to texts), CCA will advocate for reasonable rules that do not create burdensome or cost-prohibitive requirements.

988. CCA will continue to work with members to support the implementation of georouting solutions for calls to 988 as the December 2026 non-nationwide compliance deadline approaches. CCA will also continue to advocate for flexible, industry-driven approaches to any expansion of georouting requirements, including for text messages, that appropriately reflect carrier capabilities and resource constraints.

FirstNet Reauthorization. The nationwide first responder communications network (FirstNet) is subject to Congressional reauthorization, or it will sunset in 2027. As part of the reauthorization process, CCA will advocate for increased transparency, rigorous oversight, and pro-competitive conditions (e.g., increased partnerships/RAN sharing, heightened interoperability, more reasonable limitations on who qualifies for FirstNet) where possible to ensure a fair and competitive environment focused on the needs of local public safety providers on the front lines of emergency response. CCA will also support efforts of the Coalition for Emergency Response and Critical Infrastructure (CERCI) to advocate for local control of the 4.9 GHz band currently used by public safety organizations across the country and expand use of the band to CII users as opposed to giving additional spectrum to FirstNet.

Wireless Emergency Alerts. CCA will oppose efforts to make the WEA program mandatory or unreasonably expand the program. CCA will continue to highlight the marketplace challenges that smaller carriers face in implementing WEA and will recommend that any additional obligations and implementation deadlines appropriately reflect those challenges.

NG911. CCA will work with members to ensure they have the necessary resources to transition to NG911. NG911 capabilities, access, and technologies have also drawn the interest of Congress, and CCA will continue to monitor relevant legislation.

Network Resiliency. CCA continues to monitor network resiliency proposals from Congress and the administration to ensure these efforts balance public safety needs without unduly burdening carrier resources. CCA will work to reduce member burdens associated with outage notifications to enable carriers to focus more of their resources on resolving outages.

DEVICES

Consumer devices are a key component of communications networks, and consumers demand the newest devices and functionalities. Internet of Things (IoT) devices are also proliferating and leveraging networks for myriad consumer and business applications. CCA will work to ensure that its members have acceptable access to devices and functionalities to stay competitive and meet consumer demand.

Access. Access to devices and relevant software/functionalities remains paramount for competitive carriers. CCA offers business and policy solutions to ensure members have access to the devices consumers demand and continues to explore innovative partnership arrangements through its Business Innovation Group (BIG). CCA will continue working to ensure that competitive carriers have timely access to devices with full functionality, software upgrades, and other resources from manufacturers.

Phone Unlocking. CCA will continue its advocacy to reject a universal unlocking mandate in favor of rules that are practical and allow flexibility.

Device Functionality/Operability. CCA will work to ensure OEMs facilitate necessary device functionality for all carriers, including to support VoLTE services and 911. CCA will also work to ensure device operability for members and their customers.

IoT. CCA will support policies that enable IoT deployments by competitive carriers without imposing unnecessary regulatory barriers.

HAC Compliance. CCA will help members with any policy issues arising from the December 14, 2026 equipment vendor deadline for full HAC compliance in the United States.

TAX

Alleviating tax burdens on competitive carriers results in increased investment in innovation and connectivity. Legislation in 2025 included policies helpful to CCA members, such as permanently restoring and expanding bonus depreciation and expensing for domestic research and development. CCA will continue to urge Congress to avoid hindering investment, growth, and connectivity when considering revenue-raising mechanisms and policies.

Broadband Funding. CCA will advocate for Congress to exempt broadband funding programs from being taxed as income to support efficient programs and maximize benefits from finite funding programs.

CONSUMER ISSUES

Safe Connections Implementation. CCA will continue to work with members to ensure they have the information and resources necessary to implement the rules required by the Safe Connections Act.

SIM Swap and Port-Out Fraud Order Implementation. CCA will continue to support members when/if they are required to implement the FCC's SIM swap and port-out fraud rules and will emphasize the role of brands in preventing fraud.

TRS. CCA will advocate for lowering TRS expenses or ideally eliminating the program as alternative technology continues to evolve.

RF Exposure. CCA will support a uniform, evidence-based approach in any renewed RF exposure proceedings and work to ensure any related disruptions to infrastructure deployment.

REGULATORY BURDENS

CCA will engage in White House, Congressional, and/or relevant administrative agency advocacy to reduce or eliminate burdensome regulatory requirements on CCA members (e.g., excessive/incremental public safety regulations) while ensuring sufficient administrative agency resources to accomplish needed functions such as auctions, USF administration, and licensing. CCA will support Administration deregulatory efforts to the fullest extent possible to reduce regulations without adding additional costs to CCA members, and will support regulatory modernization proceedings to update compliance and reporting frameworks to better align with current technologies and data flows while preserving strong consumer protections.