Before the
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
Washington, D.C.

In the Matter of	)	
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Regulatory Reform on Artificial Intelligence	)	OSTP-TECH-2025-0067
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COMMENTS OF COMPETITIVE CARRIERS ASSOCIATION

Competitive Carriers Association[1] ("CCA") respectfully submits these comments in response to the Office of Science and Technology Policy's Request for Information ("RFI") on advancing artificial intelligence ("AI") innovation and development in the United States through regulatory reform.[2] CCA emphasizes that sustained investment in communications infrastructure, particularly in rural America, is necessary to the successful adoption of AI technologies and to maintaining U.S. global leadership in this field.

I. The Win-Win Potential for AI in Rural Areas

President Trump and his Administrations have recognized the importance of rural America and worked to ensure these communities share in the nation's prosperity.[3] One of the first actions

[1] CCA is the nation's leading association for competitive providers and stakeholders across the United States. Members range from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers, as well as vendors and suppliers that provide products and services throughout the communications ecosystem.

[2] Office of Science and Technology Policy, *Regulatory Reform on Artificial Intelligence*, Request for Information, 90 Fed. Reg. 46422 (Sept. 26, 2025) ("RFI").

[3] *See, e.g.,* White House Office of Intergovernmental Affairs, *Promoting Rural Prosperity in America* (Oct. 2020) (detailing rural-focused activities of the first Trump Administration), https://trumpwhitehouse.archives.gov/wp-content/uploads/2020/10/Promoting-rural-prosperity-in-america.pdf.

of the current Administration was issuing an Executive Order to remove barriers to American leadership in AI, leading to the creation of America's AI Action Plan. This plan focuses on accelerating data center deployment and advancing AI innovation and adoption to strengthen U.S. global leadership.[4]

Since the release of the AI Action Plan, the White House has taken meaningful steps to encourage AI deployment across multiple sectors. In communications, efforts to speed up permitting for data center infrastructure are especially important.[5] These actions will not only accelerate the benefits of AI nationwide but also advance broader policy priorities. For example, streamlining AI-related permitting can also accelerate broadband deployment in rural areas, creating opportunities and benefits for both AI innovation and adoption.

CCA applauds America's AI Action Plan as an important milestone toward ensuring U.S. leadership in this critical technology. CCA strongly supports the plan and asks OSTP to recognize communications networks—especially 5G mobile broadband and supporting middle-mile and backhaul connections—as a core layer of AI infrastructure. End-to-end AI performance depends not only on compute and storage capacity, but also on the low-latency, high-reliability, and secure connectivity that links data centers, edge locations, users, and devices. Treating 5G networks as AI-enabling infrastructure—eligible for streamlined permitting, coordinated funding, and cross-agency alignment—would accelerate adoption, ensure rural parity, and maximize the return on federal AI investments. Because most Americans will experience AI primarily through mobile

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[4] Removing Barriers to American Leadership in Artificial Intelligence, Executive Order 14179, 90 Red. Reg. 8741 (Jan. 23, 2025). *See also Winning the AI Race: America's AI Action Plan* (July 23, 2025) ("AI Action Plan"), https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf.

[5] *Accelerating Federal Permitting of Data Center Infrastructure,* Executive Order 14318, 90 Fed. Reg. 35385 (July 23, 2025), https://www.whitehouse.gov/presidential-actions/2025/07/accelerating-federal-permitting-of-data-center-infrastructure/.

environments, this network layer is just as essential to America's AI infrastructure as data centers and energy systems.

CCA members Nokia and Ericsson have both highlighted the close connection between AI and communications infrastructure. Nokia has described how AI will transform network operations and enable new use cases, with communications providers serving as both users of AI – through applications such as network management, customer service, and dynamic spectrum sharing – and enablers of AI for others through fixed and mobile connectivity.[6] Ericsson has similarly discussed how smart 5G connectivity can drive opportunities in rural areas, including the future of farming through smart agriculture.[7]

GPU and AI computing leader Nvidia has also emphasized that AI-powered communications and 5G will be central to advancing edge applications that are vital to America's competitiveness and global leadership. As Nvidia notes:

> [The] Adoption of AI is especially important for telecom companies, because of their unique placement in the daily lives of nearly every person on the planet. Not only are they key enablers of foundational services such as voice and internet, but they're also the trusted source of local infrastructure, becoming a platform for innovation and adoption of all kinds of software, including AI. Telecom operators will be both adopters of AI and the engine that pushes AI solutions to billions of customers in nearly every country on the planet.[8]

5G networks enable more processing at the network to occur at the "edge" of the network—closer to the user—reducing latency for real-time applications. With the right policies and support, rural

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[6] *See* Nokia, *The AI revolution: Preparing for a surge in 5G uplink traffic* (Dec. 17, 2024) (detailing how AI will transform mobile networks and facilitate AI applications and uses), https://www.nokia.com/blog/the-ai-revolution-preparing-for-a-surge-in-5g-uplink-traffic/.

[7] Ericsson, *The Future of Farming: How Smart Agriculture Can Help Reach Key Sustainability Goals,* https://www.ericsson.com/en/about-us/new-world-of-possibilities/imagine-possible-perspectives/smart-farming (last visited Oct. 22, 2025).

[8] Nvidia, *State of AI in Telecommunications: 2025 Trends Survey Report* at 9 (2025), https://resources.nvidia.com/en-us-ai-in-telco/telco-report-state-o.

networks, including 5G towers sites, can advance AI adoption and improve network efficiency by using available capacity to support AI processing near end users. This creates a win-win opportunity: connecting Americans today while enabling new business models that sustain and expand rural network investments. The United States Artificial Intelligence Institute has likewise highlighted the importance of AI in rural areas for national leadership and success in the Fourth Industrial Revolution.[9] The Administration's continued focus on AI presents a prime opportunity to close the digital divide, strengthen rural economies, and drive innovation that delivers benefits far beyond AI itself.

II. Potential Regulatory Barriers to the Success of AI in Rural America

The RFI seeks to advance AI Action Plan by "identifying the regulatory and procedural barriers that unnecessarily slow safe, beneficial AI deployment."[10] It identifies a category of regulations that would tend to thwart AI advancement through "the lack of regulatory clarity, where insufficient guidance and rules that plausibly cover AI systems delays adoption, increases compliance costs, and slows innovation."[11] Telecommunications and data connectivity is key to the advancement of AI in the United States. Connectivity must be ubiquitous, low-latency, and high speed. That requires modern interconnection among networks, since AI systems and applications depend on the ability to exchange data dynamically and reliably across all platforms. This is particularly true for the more insular and rural areas of the United States, with high potential for AI infrastructure locations, data centers, and next-generation manufacturing facilities. Even

[9] United States Artificial Intelligence Institute, Bridging the Digital Divide: Leveraging AI for Inclusive Transformation in Rural Communities (Apr. 28, 2025), https://www.usaii.org/ai-insights/bridging-the-digital-divide-leveraging-ai-for-inclusive-transformation-in-rural-communities.

[10] RFI at 46423.

[11] *Id.*

more, rural areas are ripe with potential for AI adoption and AI-based economic development opportunities.

Fragmented or inconsistent state-level regulations could slow progress. For example, some states have proposed rules—such as New Jersey's draft regulation requiring opt-in consent before using personal data to train AI systems[12]—that, while well-intentioned, could impede legitimate and beneficial AI uses-cases; a coordinated federal approach would help prevent a patchwork of state laws that could hamper AI investment and innovation.

A. FCC Proceedings Potentially Impacting AI in Rural Areas

The Federal Communications Commission ("FCC") is the primary regulator of private sector communications in the United States. A core goal of the FCC-administered Universal Service Fund ("USF") is to close the digital divide by ensuring that no areas are left behind by providing similar levels of service in rural and urban areas. Maintaining and upholding the USF will be key to the realization of U.S. global leadership in AI. Alongside the U.S. government, CCA argued in support of the Universal Service Fund, and the U.S. Supreme Court upheld the USF framework in its decision earlier this summer in *FCC v. Consumers Research*.[13] Nevertheless, there are regulatory aspects of the USF that threaten to jeopardize the proliferation of AI, particularly in rural areas, and there are other regulatory items pending before the FCC that would similarly undermine the Administration's goals insofar as they relate to AI and economic development in rural areas of the country. CCA wishes to emphasize the importance of these proceedings to OSTP.

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[12] *See* Davis Wright Tremaine LLP, "New Jersey Proposes Comprehensive Privacy Regulations," *Privacy & Security Law Blog* (June 18, 2025), available at https://www.dwt.com/blogs/privacy--security-law-blog/2025/06/new-jersey-privacy-regulations-proposed (describing proposed New Jersey Division of Consumer Affairs regulations that would require opt-in consent before using personal data to train artificial-intelligence systems).

[13] *FCC v. Consumers Research,* 145 S. Ct. 1825 (2025).

First, the FCC has pending reconsideration petitions of its August 2024 5G Fund order that created a framework to disburse funding to deploy 5G infrastructure in rural America.[14] Granting these reconsideration petitions and restructuring the 5G Fund as requested would facilitate the deployment of high-grade mobile connectivity to the edge in rural communities needed to power AI applications and adoption. Second, also pending before the FCC are requests to enable rural wireless companies to recoup operational expenses from the USF that are essential to maintaining connectivity in some of the most rural areas of the country. Without this support, connectivity in rural areas will decline—increasing the digital divide and robbing these areas of the opportunities that AI could provide. Reductions in service availability because of the lack of USF support for operational expenses will cut off access to all connectivity, creating a significant barrier to advancing AI services in rural America.

Finally, the FCC is evaluating reforms to interconnection rules to ensure that the entire country is seamlessly connected. Efficient and effective interconnection is key to the origination, routing, and completion of all communications traffic. It will also be key to the levels and quality of connectivity needed to support AI applications and widespread AI adoption. Full Internet Protocol ("IP")-based interconnection among networks is a necessary prerequisite for realizing the full benefits of AI. AI-driven applications—such as real-time analytics, edge computing, and intelligent network management—depend on seamless, low-latency data exchange across multiple networks and providers. Without ubiquitous IP interconnection, AI systems cannot function end-

[14] *Establishing a 5G Fund for Rural America,* Second Report and Order, Order on Reconsideration, and Second Further Notice of Proposed Rulemaking, FCC 24-89, GN Docket No. 20-32, 89 Fed. Reg. 101358 (Dec. 13, 2024). *See also* Petition for Reconsideration of Coalition of Rural Wireless Carriers, GN Docket No. 20-32 (filed Jan. 13, 2025); Petition for Reconsideration of the Rural Wireless Association, Inc., GN Docket No. 20-32 (filed Jan. 10, 2025).

to-end, particularly in rural and regional areas where traffic often traverses several networks. Ensuring technically and economically feasible IP interconnection across all networks will therefore be foundational to enabling nationwide AI innovation, deployment, and competition.

As it currently stands, the FCC is proposing to forbear from regulations that ensure that the interconnection framework in the United States remains seamless, competitive, and fair. This jeopardizes existing and future technologies relied upon to maintain the level of connectivity needed to support AI-enabled innovation. CCA urges the OSTP to emphasize the importance of a modern, consistent national interconnection framework that supports full IP interconnectivity as a critical building block for AI development and adoption. Establishing such a framework would ensure interoperability across networks, enhance reliability, and provide the technical foundation necessary to power the next generation of AI-driven applications and services. AI's success depends on national consistency in network connectivity. OSTP's leadership in promoting an interoperable, IP-based interconnection framework will ensure that the United States remains at the forefront of AI-enabled communications and innovation.

B. Other Agency Opportunities to Drive AI Success in Rural America

Other federal agencies that play an important role in expanding rural communications infrastructure, which is a key part of America's AI leadership, include the National Telecommunications and Information Administration ("NTIA") and the U.S. Department of Agriculture ("USDA"). NTIA's broadband programs, such as the Broadband Equity Access and Deployment ("BEAD") Program, and USDA's ReConnect Program help bring high-speed internet to rural communities. CCA encourages the White House to keep supporting and strengthening these programs to build strong, reliable rural networks that will be vital to advancing the nation's AI goals.

For example, NTIA is currently reviewing its guidance on how states may use "non-deployment" funds under the BEAD program.[15] These funds represent a meaningful pool of resources, and CCA believes they would have the greatest impact if directed toward expanding mobile connectivity in rural areas. Focusing available BEAD resources on mobile deployment would advance both broadband and AI-readiness by ensuring that the communications infrastructure needed to support future AI applications is in place.

Similarly, any new funding appropriated to the USDA's ReConnect program could help accelerate AI adoption in rural areas by prioritizing grants or loans to companies investing in projects that expand mobile broadband and strengthen network performance. Prioritizing projects that enhance rural wireless networks will help build the technical foundation for future AI innovation without diverting limited resources from essential communications needs.

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[15] NTIA, *BEAD Restructuring Policy Notice* at 15 (June 6, 2025), https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf.