

June 12, 2025

VIA ECFS

Marlene H. Dortch, Secretary
Office of the Secretary, Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Wireless Telecommunications Bureau Seeks Comment on Verizon's Petition for Waiver of the Commission's Section 27.16(e) Handset Unlocking Rule and Verizon's Tracfone Unlocking Commitment
Docket Nos: WT 06-150; WTB 24-186; GN 21-112

Dear Ms. Dortch,

In light of President Trump's directive to federal agencies to jettison old, outdated, and counterproductive regulations, we support the Federal Communications Commission's efforts in this regard. In particular, we support Verizon's petition to waive the unlocking rule and strongly feel that FCC action to remove this burdensome regulation is long overdue.¹ Some of the signers submitted comments in support of the FCC's proposal in the proceeding on *Promoting Consumer Choice and Wireless Competition Through Handset Unlocking Requirements and Policies* last year.²

Clearing the regulatory underbrush can best be accomplished by strategic policy making that identifies and eliminates regulations that have outlived their usefulness or, in some cases, should never have been adopted at all. One regulatory inefficiency that should be swiftly addressed is the continued existence of the C-Block rules, which include the unlocking rule and were adopted by the FCC in 2007. Even at that time, the Commission acknowledged the open access and device unlocking requirements the C-Block rules imposed were experimental in nature and could present "unanticipated drawbacks." Now, nearly two decades later, those drawbacks have become plainly evident and need to be addressed.

Today's wireless marketplace is fiercely competitive, and wireless technologies have dramatically evolved from what they were 20 years ago, an unlocking mandate continues to unnecessarily impose unique burdens on what amounts to a single provider that impedes competition and the benefits it brings to consumers. It has also inadvertently opened a way for criminals, many of them in other countries, to unfairly profit from American consumers.

¹ Verizon Petition for Waiver. (filed May 19, 2025), <https://www.fcc.gov/ecfs/search/search-filings/filing/1051935705713>

² Reply Comments of 60 Plus Association et al., *Promoting Consumer Choice and Wireless Competition Through Handset Unlocking Requirements and Policies*, WT Docket No. 24-18 (filed Sept. 16, 2024), <https://www.fcc.gov/ecfs/document/1091603938031/1>

The unlocking rule has created a huge law-and-order problem. For example, sophisticated international organized crime rings have been able to avoid protections against the trafficking of lost, stolen, or fraudulently obtained devices. They can rake in enormous profits by illicitly acquiring heavily subsidized U.S. phones and reselling them abroad. This criminal enterprise costs Verizon and its customers billions of dollars, forces law enforcement agencies to expend valuable time and resources to pursue handset trafficking fraud and related criminal activity, and hinder access to subsidized devices for honest U.S. consumers, including seniors, lower-income families, and workers.

Waiving the unlocking rule as a start – but ultimately going broader to eliminate the C-Block rules – all of which are clearly unnecessary in the modern wireless market, would benefit American consumers by giving them access to better deals and blocking devices and resources from being diverted to bad actors. In accordance with the commendable mandate from the Trump administration for federal agencies to eliminate unwarranted and onerous regulations, we strongly encourage the FCC to act as quickly as possible.

Sincerely,

James L. Martin, Founder/Chairman
60 Plus Association

Bret Swanson, Founder
Entropy Economics

Saulius “Saul” Anuzis, President
American Association of Senior Citizens

Mario H. Lopez, President
Hispanic Leadership Fund

Steve Pociask, Founder
American Consumer Institute

Tom Giovanetti, President
Institute for Policy Innovation

Bronwyn Howell, PhD
Nonresident Senior Fellow
American Enterprise Institute

Petrus Potgieter, PhD, Researcher
Institute for Technology and Network
Economics

Tom Schatz, President
Citizens Against Government Waste

Seton Motley, Founder
Less Government

Matthew Kandrach, President
Consumer Action for a Strong Economy
(CASE)

Roslyn Layton, PhD, Senior Fellow
National Security Institute
George Mason University

James Erwin, Executive Director
Digital Liberty

CC: Hon. Brendan Carr, Chairman, FCC
Hon. Anna Gomez, Commissioner, FCC