

**STATEMENT OF
COMMISSIONER GEOFFREY STARKS,
APPROVING IN PART AND DISSENTING IN PART**

Re: *Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services*, WC Docket No. 19-308.

Last November, just a few months after our August 2019 forbearance decision, I concluded that there was not an urgent need for another proceeding and further abandonment of the tools that the 1996 Act gave the Commission to promote competition. I argued then, and still believe, that it would have been better to take more time to let the competitive consequences of our previous forbearance orders play out before moving forward with further deregulation.

Despite those reservations, I recognize the many months of hard work that went into the compromise proposals offered in this proceeding by USTelecom, INCOMPAS, and many of their members. In recent years, simply participating in various forbearance proceedings has placed significant burdens on many smaller providers. I understand the desire of all the parties involved to create some certainty for the coming years, and I respect the parties' judgment that the tradeoffs reflected in the compromise are worth it. I am, therefore, pleased to approve the parts of today's decision that adopt the USTelecom and INCOMPAS compromise proposals.

At the same time, I continue to believe that further deregulatory actions should be based on rigorous data collection, reasoned analysis, and a careful look back at the results of the Commission's recent deregulatory actions. Not every change in the market or new technological development means that our pro-competition rules have become outdated or irrelevant. We have, as the last few months have made clear, a long way to go when it comes to solving internet inequality. Promoting competitive options remains an important part of that effort. For that reason, I respectfully dissent with respect to the remainder of today's decision, and I thank the staff of the Wireline Competition Bureau for their work on this item.