

**STATEMENT OF  
COMMISSIONER GEOFFREY STARKS**

Re: *Updating the Intercarrier Compensation Regime to Eliminate Access Arbitrage*, WC Docket No. 18-155, Further Notice of Proposed Rulemaking (July 14, 2022).

In 2011, the Commission recognized that local exchange carriers undertaking access stimulation was harmful and took action. Ever since, the Commission has been forced to play Whack-a-Mole in intercarrier compensation. Bad actors enter into access revenue sharing agreements and hit certain traffic ratio triggers—WHACK. New arbitrage schemes created between 2011 and 2019—WHACK. But this is no game, and today we take the next step in hitting bad actors seeking to take advantage of our rules to harm consumers and enrich themselves.

So, while I'm frustrated that we must continuously use scarce resources to modify our rules due to harmful actions from a small group of carriers, I'm heartened by the hard work of Commission staff in the Wireline Competition and Enforcement Bureaus, and the changes we propose in this item. I thank the Bureaus' staff and approve the item.