

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: *Reform of Certain Part 61 Tariff Rules*, WC Docket No. 18-276; *Petitions for Limited Waiver of Rule 61.74(a)*, WC Docket No. 17-308.

Kudos to the Chairman for his continued efforts to modernize and reform our existing regulations. Here, the anachronistic tariff cross-referencing ban and a similarly outdated filing requirement for price cap carriers are rightfully set for the dust bin. To the extent that these reforms eliminate unnecessary burdens for those that prepare such tariffs, it's hard to imagine any downside, especially since not one soul raised an objection in the record.

At the same time, put me down as someone who is open to much broader reforms and the comprehensive elimination of unnecessary tariff rules. The whole concept of tariffing is antiquated, inefficient, generally irrelevant, and helps preserve outdated communications networks at the expense of modern architecture and deployment. One example that deserves exploration and serious consideration for quick implementation involves transit service. That is, to the extent we can work through issues related to transit responsibility and path choice, as some have suggested, we could and should completely detariff transit services. This idea is far from radical and can be done without creating perverse consequences—all to the benefit of American consumers in the long run.

And, the same goes for many other aspects of tariffing. Out they should go, too. All we need to do is overcome the regulatory inertia of the status quo and grab the opportunity to put this entire structure in our rearview mirror.