

**STATEMENT OF
MICHAEL O'RIELLY**

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

This item follows the Commission's previous Orders partially granting USTelecom's Petition for Forbearance from the 1996 Telecom Act's unbundling provisions and related requirements. While I supported the actions taken by the Commission to provide relief on certain transport, analog loop, and other elements, those decisions were limited in scope and left intact some components of the FCC's unbundled network elements (UNE) regime that we revisit here.

I have long been critical of regulatory silos that disparately and artificially burden a particular subset of competitors. I also rightfully acknowledge that the competitive and regulatory landscape has completely changed since the 1996 Telecom Act, and that the rise of intermodal facilities-based competition has far eclipsed regulatory-based competition in transforming the communications marketplace. And, as the draft acknowledges, this competitive environment is only bound to get fiercer as 5G wireless technologies enter the residential market for broadband services. Nonetheless, I don't take lightly the decision to overhaul our UNE framework, and will be approaching this proceeding carefully and with an open mind.

I look forward to reviewing the record closely and will vote to approve.