

**CONCURRING STATEMENT OF  
COMMISSIONER GEOFFREY STARKS**

Re: *Connect America Fund*, WC Docket No. 10-90; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92.

Over the last decade, the FCC has taken numerous steps, including the 2011 Transformation Order, to update its rules to support the transition to IP-based networks. During that time, we have repeatedly recognized that many of the technical distinctions in our rules are no longer relevant and may impede the IP transition. The 2015 Declaratory Ruling underlying today's action was adopted to help ensure that those rule changes promoted and protected competition.

While I recognize that the D.C. Circuit's decision narrowed our policy options, I have concerns about the approach the Commission has taken today. To that end, I will concur. Today's decision purports to advance competition in the voice services market, but it is more likely to deter competition by disadvantaging over-the-top VoIP providers. In many recent decisions, the Commission has proceeded as if our work to promote competition is done. The facts on the ground make clear that isn't true. We must continue to support competitive choices that promote better service and lower prices for American consumers.