

**DISSENTING STATEMENT OF
COMMISSIONER ANNA M. GOMEZ**

Re: *Delete, Delete, Delete*, GN Docket No. 25-133, Direct Final Rule (Sept. 30, 2025).

Once again, I want to thank agency staff for identifying Commission rules that may have outlived their usefulness. I know there is growing pressure on them to come up with potential rules for deletion to meet an arbitrary rule reduction quota, so I want to acknowledge their hard work.

My process concerns, however, remain. The procedures used today to erase rules adopted pursuant to notice and comment were put in place without seeking public comment on appropriate processes and guardrails. I cannot support the elimination of substantive rules pursuant to these procedures.

This is particularly concerning when we're dealing with rules that involve accessibility issues. Many of the rules being removed through this process today involve the deaf and blind community. But this Direct Final Rule does little to explain exactly how these changes may impact their ability to receive accessible equipment or make it harder for consumers with disabilities to lodge complaints or understand their rights.

Instead, we give the public just 20 days to review and understand 386 rules they may not even be aware of that are up for removal, and to file significant adverse comments that may or may not be deemed sufficient to stop that process. When it comes to eliminating longstanding protections for vulnerable populations, this is simply not enough.

Take for example the case of the agency's review of our adherence to National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) reviews. Instead of making changes in a vacuum, that Notice of Proposed Rulemaking has allowed remote and distant tribal communities to weigh in about the impact of abandoning these protections altogether.

Through that process, the Organized Village of Kasaan, a tribe in Alaska, has told us that Kasaan village is "home to the only remaining Haida longhouse in the United States, and [their] lands contain burial sites, carving sheds, and traditional food harvesting areas." According to them, previous infrastructure projects "have disrupted salmon spawning grounds and crab habitats, which are central to [their] food security and cultural practices."

As this case shows, this is exactly why we give these communities proper notice and comment periods.

And so, while some of these are not substantive rules, I worry about the public's ability to properly assess the impact of the broader changes we're proposing here.

For this reason, I dissent.