

**STATEMENT OF
COMMISSIONER OLIVIA TRUSTY**

Re: *Maximizing Efficiencies in the Universal Service Administration*, WC Docket No. 26-173, Notice of Proposed Rulemaking (August 6, 2026).

The Commission can delegate work, but it cannot delegate its statutory responsibilities.

Last year, the Supreme Court affirmed the constitutionality of the Universal Service Fund. In doing so, it also reaffirmed an important principle: while the Universal Service Administrative Company performs vital administrative functions, the Commission, and the Commission alone, is responsible for making the policy decisions entrusted to us by Congress.¹

Congress has likewise recognized the importance of maintaining appropriate oversight of USAC's role. For example, the Broadband DATA Act makes clear that management of the National Broadband Map, a critical tool for Commission policymaking, cannot be delegated to USAC.² And where Congress has assigned USAC important administrative responsibilities, it has also imposed safeguards to ensure careful stewardship of public resources, as with the Emergency Connectivity Fund.³

What began as a temporary administrative arrangement has, over nearly three decades, evolved into a quasi-permanent structure we rely on today. As that role has grown, it is only appropriate that the Commission periodically examine whether its oversight should evolve as well.

This Notice does exactly that by seeking comment on ways to ensure that USAC operates efficiently and effectively, and as transparently as possible while remaining accountable to the Commission. I especially welcome the opportunity to consider improvements to USAC's outreach and stakeholder engagement, as well as ideas to strengthen oversight and increase transparency into USAC's decision-making.

I thank the Wireline Competition Bureau for its great work on this item.

¹ *FCC v. Consumers' Research*, 606 U.S. 656, 693 (2025).

² Broadband Deployment Accuracy And Technological Availability Act, Pub. L. 116-130, § 806(c)(1) (2020).

³ American Rescue Plan Act of 2021, Pub. L. 117-2, § 7402(c)(2)(A)(ii), (3) (2021) (capping the amount of Emergency Connectivity Funds that could go to expenses for program administration by USAC).