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June 29, 2026

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: *Improving Customer Service and Protecting Consumers through Onshoring, CG Docket Nos. 26-52, 17-59, 02-278, & 22-2***

Dear Ms. Dortch:

Consumer Technology Association® (CTA)<sup>1</sup> submits these reply comments underscoring the points CTA and others made in the record that industry is competing to provide effective customer service and regulatory intervention is unnecessary and beyond the scope of the Federal Communications Commission’s (Commission’s or FCC’s) authority.<sup>2</sup> The record reinforces what CTA detailed in its comments: the market is a better solution than heavy handed mandates.<sup>3</sup>

**The Record Confirms That Competition Drives Companies to Provide Quality Customer Service**

Commenters agree that companies strive to provide superior customer support.<sup>4</sup> CTA agrees that “market dynamics already discipline poor customer service performance more effectively than prescriptive regulation could” and “[c]ompanies that fail to deliver

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<sup>1</sup> As North America’s largest technology trade association, CTA® is the tech sector. Our members are the world’s largest innovators—from startups to global brands—helping support more than 17 million American jobs. CTA owns and produces CES®—the most powerful tech event in the world.

<sup>2</sup> *Improving Customer Service and Protecting Consumers through Onshoring et al.*, Notice of Proposed Rulemaking in CG Docket No. 26-52; Tenth Further Notice of Proposed Rulemaking in CG Docket No. 17-59; Further Notice of Proposed Rulemaking in CG Docket No. 02-278; Third Further Notice of Proposed Rulemaking in CG Docket No. 22-2, FCC 26-16 (rel. Mar. 27, 2026) (NPRM).

Unless otherwise noted, comments referenced herein were filed in CG Docket No. 26-52 on or about June 2, 2026.

<sup>3</sup> See *generally* Comments of Consumer Technology Association (CTA Comments).

<sup>4</sup> See *generally* CTA Comments at 1-2; Comments of INCOMPAS and the Cloud Communications Alliance at 19-22 (INCOMPAS/CCA Comments); Comments of CTIA at 4-9; Comments of Echostar at 2 (Echostar Comments); Comments of Vistra Corp. at 5-6 (Vistra Corp. Comments).

effective support experiences suffer reputational harm, customer attrition, and competitive disadvantage.”<sup>5</sup> Today, “customer demand and competition between players in the communications marketplace have driven the call center market to significantly improve operations to meet customers’ needs.”<sup>6</sup> This includes ensuring that offshore call center representatives are of high quality (e.g., English proficiency, cultural training, highly educated, and with years or decades of experience) and that offshore call center representatives are highly effective and result in satisfied customers.<sup>7</sup>

### **The Commission Lacks Authority to Mandate Specific Methods of Customer Service Support**

The sweeping proposals contained in the Commission’s NPRM are fundamentally flawed because they lack legal foundation. Indeed, the record confirms that the Commission lacks the statutory authority to implement its proposals.<sup>8</sup> As the Chamber of Commerce *et al.* observe, “[a]ll of the proposed authorities are clear on their face: they do not authorize the [NPRM’s] proposals” and even if “there were ambiguity, the major-questions doctrine would foreclose the significant assertion of authority that the Commission is contemplating.”<sup>9</sup>

The Commission similarly lacks the authority to mandate specific methods of customer support, such as Direct Video Calling (DVC).<sup>10</sup> Doing so would impose a technical standard, which is not allowed under the statute.<sup>11</sup> The Commission has already established performance objectives for industry to ensure accessibility, usability, and compatibility.<sup>12</sup> Additional rules are unnecessary, would be costly, and are beyond the scope of the Commission’s authority.<sup>13</sup>

Current customer support systems provide a wide variety of ways to find assistance, including for individuals with disabilities. Consumers reach companies not only by

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<sup>5</sup> INCOMPAS/CCA Comments at 21; *see also* Vistra Corp Comments at 3 (discussing how “foreign call centers are essential to customer safety, satisfaction and service continuity because, among other things, “[m]issed calls in the utility context can have severe consequences”).

<sup>6</sup> Echostar Comments at 2.

<sup>7</sup> *See generally* Echostar Comments; Vistra Corp Comments at 2.

<sup>8</sup> *See, e.g.*, Comments of the U.S. Chamber of Commerce, Michigan Chamber of Commerce, Georgia Chamber of Commerce, Kentucky Chamber of Commerce, Business Council of New York State, Inc., and Pennsylvania Chamber of Business and Industry at 26-29 (Chamber of Commerce *et al.* Comments); INCOMPAS/CCA Comments at 3-19; Comments of NCTA – The Internet & Television Association at 4-23.

<sup>9</sup> Chamber of Commerce *et al.* Comments at 26.

<sup>10</sup> Comments of the Accessibility Organizations at 11 (“The Commission should require DVC as the *default* method for customer service communications with ASL users.”) (emphasis added) (Accessibility Organizations Comments).

<sup>11</sup> *See* 47 U.S.C. § 617(e).

<sup>12</sup> *See generally* 47 C.F.R. parts 6, 7, and 14.

<sup>13</sup> Other authorities cited in the record, Accessibility Organizations Comments at 14-16, also fail to provide the FCC with requisite authority. This Administration has been clear that its agencies should seek to avoid costly regulations and adhere to best reading of the underlying statute.

phone but also through text, in-app messaging, live chat, social media, website portals and AI-assisted tools. These options: (a) allow consumers to choose the channel that best fits their needs and context; (b) reduce wait times and speed resolution; and (c) enhance accessibility for consumers with disabilities or language preferences. These methods also ensure that companies are fulfilling their legal responsibilities to ensure that their products and services are accessible to and usable by individuals with disabilities, as “readily achievable” or “achievable,” as applicable.<sup>14</sup>

As the Commission evaluates these different communication channels,<sup>15</sup> it should make sure that its policies preserve flexibility so providers can continue innovating to deliver faster, more reliable outcomes for their consumers. This would be consistent with the statute, which directs the FCC to set performance objectives, and prohibits imposing technical mandates.<sup>16</sup> The Commission should reject calls to mandate specific communications technologies, as suggested in the record.<sup>17</sup>

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CTA continues to urge caution on the NPRM’s proposed onshoring and related requirements. The proposals and other suggestions in the record to impose new customer service mandates have the potential to harm the very consumers they aim to protect by increasing costs, decreasing efficiency and slowing innovation. Retaining the current flexibility will allow industry to continue leveraging global expertise and modern tools to deliver fast and accessible support.

Respectfully submitted,

/s/ Rachel Nemeth

Rachel Nemeth  
Vice President, Regulatory & Government Affairs

/s/ J. David Grossman

J. David Grossman  
Vice President, Policy & Regulatory Affairs

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*Executive Order 14192 of January 31, 2025, Unleashing Prosperity Through Deregulation*, 24 Fed. Reg. 9065 (Feb. 6, 2025); *Executive Order 14219 of February 19, 2025, Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative*, 36 Fed. Reg. 10583 (Feb. 25, 2025).

<sup>14</sup> 47 U.S.C. §§ 255, 716; 47 C.F.R. §§ 6.11, 7.11, 14.21.

<sup>15</sup> See NPRM ¶ 62.

<sup>16</sup> See, e.g., 47 U.S.C. § 617(e).

<sup>17</sup> See Accessibility Organizations Comments at 11.