Since the invention of electronic filing systems, access to referenced material has become easier than ever. It seems to be in the best interest of the agency to go through with this proposal.

As stated in the discussion section of the proposed rules, the cross-referencing rule was created when tariffs were filed as hard copies. Since electronic filing eliminates the large amount of resources, it makes sense to allow carriers to cross reference now. All tariffs are filed in the FCC’s electronic data base which is accessible by the public. The concern that tariffs would reference something inaccessible or difficult to find is no longer a concern because all the tariffs are accessible and in one place. It has become a procedural step that is no longer applicable because of technological advance. It is beneficial for the FCC to modify this rule considering these advancements.

Since it requires carriers to file for special waivers every time a carrier wishes to cross reference other tariffs and because those special waivers are granted frequently with no obvious negative impact, the FCC should eliminate this procedural rule. It taxes the resources of the FCC by forcing carriers to continue to file special waivers. Bureaucratic agencies need to streamline their processes and eliminate any waste. One of the main reasons agencies subvert political principals like Congress and the President or go against public interest is because of a lack of bureaucratic resources. To eliminate this procedural step would promote democratic ideals within the agency and allow for a better response to public interest and political mandates.

It also creates unnecessary processes for companies that wish to file these claims. It is economically inefficient for the carriers and for the FCC. While I believe this claim to be true, there should be a cost-benefit analysis of changing this rule from a bureaucratic perspective.

I believe the agency is handling the elimination of this rule appropriately. It is logical to proceed in the current way.

I see no reason to exclude specific carrier types. Bureaucratic rules should be applicable across the board to all carriers to promote equity in the rules.