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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:

- **Rural Digital Opportunity Fund (RDOF)** | *WC Docket No. 19-126*

PUBLIC COMMENT REGARDING THE NEED FOR ALGORITHMIC STANDARDS, ADMINISTRATIVE TRANSPARENCY, AND COMMERCIAL CONFLICT MITIGATION

The undersigned, an independent, unsubsidized Fixed Wireless Access (FWA) broadband operator, submits these Comments to formally address the lack of clear, public standards governing how the Commission utilizes artificial intelligence (AI) to evaluate public submissions, and the unaddressed conflicts of interest inherent in those tools.

I. The Technological Shift Between 2019 and 2026

When the Commission opened WC Docket No. 19-126 in 2019 to establish the Rural Digital Opportunity Fund, the administrative framework assumed that human analysts would read, evaluate, and verify the technical assertions, speed tests, and localized deployment challenges submitted to the record.

Between 2019 and 2026, the capabilities and deployment of automated large language models and automated summarization tools have scaled exponentially. It is widely understood that federal agencies, including the Commission, now deploy internal automated AI summarization tools to process large volumes of public text and compile sentiment data.

While private corporate trades, state legal bars, the financial industry, and sister federal entities have established clear, binding ethical guidelines and human-in-the-loop mandates for AI use, the Commission has failed to provide a clear, public, written explanation detailing exactly how AI algorithms filter, condense, or alter the meaning of complex technical filings submitted by independent operators.

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II. The Asymmetry of Transparency and the Purpose of the Commission

The public expects and understands why Law Enforcement Agencies (LEAs)—such as the Federal Bureau of Investigation (FBI) or the Central Intelligence Agency (CIA)—maintain highly classified, non-disclosed operational frameworks for technology deployments due to national security.

However, the Commission is not an LEA. The stated intent and core statutory purpose of the Commission is to act as a transparent public interest body. Operating hidden, un-audited automated summarizers behind closed doors—especially during critical procedural windows like the "Sunshine Period" freeze—is completely unacceptable.

If the Commission uses automated algorithms to flatten unique, independent ground-level speed test data and technical objections into generalized AI sentiment charts, the agency creates artificial straw-man arguments. This practice allows regulators to easily dismiss valid operational complaints. Denying the public a clear understanding of the tools processing their data directly undermines the core purpose of administrative rule-making.

III. Unmitigated Commercial Conflicts of Interest Mandate Immediate Investigation

A critical, yet dangerously overlooked issue is the direct legal and financial overlap between the commercial owners of these AI systems and the corporate recipients of RDOF funding.

The Commission must be strictly prohibited from utilizing any automated AI or natural language processing tools developed by technology conglomerates that hold direct legal ties, joint ventures, or investment stakes in active RDOF recipients—specifically within the space-based low-Earth orbit (LEO) sector. Allowing a technology provider's software to summarize, filter, or pass judgment on the public records of its own commercial partners or competitors creates a severe conflict of interest.

The fact that the Commission has deployed these tools without first establishing strict corporate firewall protocols or public disclosure requirements regarding tech-vendor ownership ties suggests an administrative vulnerability that begs immediate independent oversight and investigation.

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IV. Conclusion

The Commission must adopt and publish formal, binding standards regarding its internal use of AI tools to evaluate dockets, and implement an immediate ban on tools carrying commercial conflicts of interest. To maintain public trust, the agency must provide written confirmation that human analysts are reading and evaluating technical performance disputes, rather than delegating the evaluation of public infrastructure funds to compromised software models.

Respectfully submitted,

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