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## "VoIP: Why is it not your parents' Plain Old Telephone Service (POTS)?"

As policymakers consider the regulatory treatment of IP-centric networks and services CompTel/ASCENT proposes, as a guide, the following **VoIP Policy Principles**:

1. Decisions regarding VoIP issues should be clearly articulated and easily applied to all network configurations which carry VoIP traffic. While the main goal of regulation should be to foster, and not constrain, adoption of innovative applications such as VoIP, an equally important secondary goal must be that those regulations deemed necessary are clearly understood by network service providers, capable of implementation by service providers across all network architectures, and objectively enforceable by regulators or co-carriers.
2. VoIP is an IP-based application and as such is an information service, not a telecommunications service.
3. VoIP services are interstate services that fall under exclusive federal jurisdiction and are exempt from state regulatory oversight.
4. Access to ILEC last-mile bottleneck facilities must remain available to competitive carriers at TELRIC rates.
5. Inter-carrier compensation must be corrected in order to provide a fair and equitable methodology for actual cost recovery. A system should be established with incentives to ensure that traffic is routed and terminated in the most efficient manner, consistent with the performance that would be expected in a competitive wholesale market
6. To the extent that VoIP services are used as a substitute for traditional telecommunications service, issues such as E911 should be resolved through industry cooperation with state and federal regulators.
7. The need for and the interests of national security, as addressed under CALEA, should be addressed through separate and targeted proceedings which can be addressed separate from economic without relying on a regulatory reclassification of VoIP services.
8. The existing Universal Service contribution methodology must be fixed before VoIP service providers should be considered for inclusion. A flat rate, technology neutral approach to assessment triggers should be considered.

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*CompTel/ASCENT is the largest association representing nearly 400 facilities-based carriers, providers using unbundled network elements, global integrated communications companies, and their supplier partners. Association members include companies of all sizes and profiles that provide voice, data and video services in the U.S. and around the world.*