

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

<u>Order Instituting Rulemaking on the</u>)	
<u>Commission's Own Motion into the Service</u>)	Rulemaking 02-12-004
<u>Quality Standards for All Telecommunications</u>)	(Filed December 5, 2002)
<u>Carriers and Revisions to General Order 133-B.</u>)	

REPLY COMMENTS OF THE VON COALITION

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On Behalf of the VON Coalition

June 15, 2007

The VON Coalition¹ (“VON”) respectfully files these reply comments in this proceeding to urge the California Public Utilities Commission (“CPUC” or “Commission”) to refrain from imposing service quality standards on VoIP providers that currently operate in California. The CPUC does not have jurisdiction to impose standards on VoIP providers at this time. Moreover, the Federal Communications Commission (“FCC”) is considering if, whether, and what service quality standards should apply to VoIP providers, and it would be premature to act at this level before the FCC renders its determination. In addition, to the extent the Commission attempts to regulate VoIP, it should in no way attempt to establish regulatory categories different from those established by the FCC or to apply any rules to unregulated non-Interconnected VoIP services.

The VON Coalition applauds the Commission’s desire to update the record in this proceeding and determine three stated issues: whether the Commission should (1) require and publish annual customer satisfaction surveys for telecommunications service; (2) continue to monitor service quality under the Uniform Regulatory Framework (“URF”); and (3) monitor service quality for other local exchange carriers (“LECs”).² It is important to gather updated input from all potentially affected entities given the length of time that this proceeding has been pending before the Commission. Since the time that

¹ The Voice on the Net or VON Coalition consists of leading VoIP companies, on the cutting edge of developing and delivering voice innovations over Internet. The Coalition, which includes AT&T, AccessLine, BMX, BT Americas, CallSmart, Cisco, Convedia, Covad, EarthLink, Google, iBasis, i3 Voice and Data, Intel, Intrado, Microsoft, New Global Telecom, Openwave, Pandora Networks, PointOne, Pulver.com, Skype, Switch Business Solutions, T-Mobile USA, United Online, USA Datanet, VocalData, Veraz Networks, and Yahoo! Works to advance regulatory policies that enable Americans to take advantage of the full promise and potential of VoIP. The Coalition believes that with the right public policies, Internet based voice advances can make talking more affordable, businesses more productive, jobs more plentiful, the Internet more valuable, and Americans more safe and secure. <http://www.von.org>.

² Assigned Commissioner’s Ruling and Scoping Memo, March 30, 2007, at p. 7 (“Scoping Ruling”).

initial comments were filed in 2003, there have been dramatic developments in telecommunications, broadband, and other technologies that serve to offer competitive choices to consumers for telecommunications, broadband, and video services. However, simply because time has lapsed and there are additional technologies that provide voice, broadband, and video services to customers, it does not mean that the historic regulatory framework, such as service quality standards, should be applied to newer and different technologies. Voice over Internet Protocol or “VoIP” is an excellent example of an evolving technology that can significantly boost the opportunities for consumers in California and local and state economies. However, given the activities at the federal level that have already taken place with respect to VoIP, the VON Coalition respectfully submits that the Commission should not take any action to impose service quality regulation on VoIP providers.

1. The CPUC Does Not Have Jurisdiction to Impose Service Quality Requirements on VoIP Providers.

The VON Coalition submits that extending any service quality standards, such as those proposed by The Utility Reform Network³ (“TURN”), is prohibited under federal law. In November 2004, the FCC released the *Vonage Order*⁴ in which it pre-empted an order of the Minnesota Public Utilities Commission applying its intrastate “telephone company” regulations to VoIP services offered by Vonage because it found that VoIP is a jurisdictionally mixed service that cannot be practically separated into its inter and intrastate components for the purpose of complying with state regulatory requirements. Recognizing that innovative and evolving services such as VoIP should not be subject to

³ Opening Comments of the Utility Reform Network on Scoping Memo Issues, pp. 7-11 (May 14, 2007).

⁴ *In re Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, WC Docket No. 03-211 (November 12, 2004), *appeal pending*, *NASUCA v. FCC*, Docket No. 05-1122 (8th Cir.).

a patchwork of regulations that would directly conflict with the goals of the federal Act and the FCC's pro-competitive deregulatory rules, the FCC preempted state regulation of VoIP services. In doing so, the FCC also made clear that pre-empting state regulation of VoIP services was essential to "increase investment and innovation in [VoIP services] to the benefit of American consumers." The FCC has recently confirmed that nothing in its subsequent decisions to apply limited federal rules to VoIP services undermines its holding in the *Vonage Order*. In March 2007, the 8th Circuit Court of Appeals affirmed the FCC's Vonage Jurisdictional Order, which preempted state regulation of VoIP services. Given the nature of VoIP as established by the FCC's Vonage order, any application of state service quality standards to VoIP necessarily would apply to interstate service – and would be preempted under federal law.⁵ Accordingly, it would be premature for the Commission to impose any service quality regulation on VoIP providers.

2. The Commission Should Give Deference to the FCC's Pending Rulemaking on Service Quality Standards for VoIP.

It would be premature also for the Commission to consider any service quality standards on VoIP. The FCC has a pending IP-enabled services proceeding in which it is evaluating whether to apply any traditional common carrier regulations to IP-enabled services, including interconnected VoIP.⁶ The FCC should be allowed to make its determinations on not only whether it will apply such standards, including quality of service, but also, if it determines that it will apply some regulations, what those standards

⁵ See, e.g., *AT&T Corp. v. Public Utility Com'n of Texas*, 373 F.3d 641 (5th Cir. 2004) and *AT&T Communications, Inc. v. Eachus* 174 F.Supp.2d 1119 (D.OR. 2001).

⁶ *In re IP-Enabled Services*, Notice of Proposed Rulemaking, WC Docket No. 04-36 (rel. March 10, 2004).

will be, before the CPUC makes any potentially unlawful and inconsistent determinations on this issue.

Indeed, this Commission has already recognized the deference to be given to the FCC on VoIP regulatory issues. On June 16, 2006, the Commission closed its own investigation to determine the extent to which VoIP should be exempted from regulatory requirements.⁷ On June 15, 2006, the Commission closed its investigation into application of certain state regulatory requirements, finding that “we need not establish a regulatory framework for [VoIP] to resolve any of the issues raised in this investigation at this time.”⁸ The issues under investigation focused on whether VoIP providers should be subject to regulatory requirements including consumer protection rules. In reaching the conclusion to close the proceeding, after it recognized the *Vonage Order*⁹, the Commission noted:

Our investigation centered on determining the appropriate regulatory framework for VoIP. Since the FCC has determined that it is charged with that role and is exercising its authority, we conclude that it is premature for us to assess what our regulatory role over VoIP will be and to address the issues raised in this investigation. We anticipate the role for state commissions will be defined in the future.¹⁰

There has been no showing that circumstances justify a change in the Commission’s determination that it would be premature to address regulation over VoIP. The FCC has neither acted nor “defined” the state commissions’ role in regulation over VoIP. Indeed, if the CPUC were to consider imposing service quality standards, this would be the first time in this country in which a state would regulate non-interconnected

⁷ *Order Instituting Investigation on the Commission’s Own Motion to Determine the Extent to Which the Public Utility Telephone Service Known as Voice over Internet Protocol Should Be Exempted from Regulatory Requirements*, I. 04-02-007 (Filed February 11, 2004).

⁸ D. 06-06-010, p. 1 (June 15, 2006).

⁹ *Id.* at p. 2.

¹⁰ *Id.* at p. 3.

VoIP service and seek to apply service quality standards on interconnected VoIP services.¹¹ While the FCC has applied limited obligations to “interconnected VoIP”¹² providers, which has not included application of service quality standards, there are numerous innovative VoIP services which use a telephone number but are not covered by the FCC’s definition of “interconnected VoIP.” These non-interconnected VoIP services which may use a telephone number but do not allow a user to call the public switched telephone network are not required by the FCC to provide E911 or to pay universal service. At the very least, state obligations should in no-way extend to non-interconnected VoIP services.¹³

In addition, there is no sign of a consumer problem. In a recent survey, nearly 90 percent of Interconnected VoIP early adopter households claim the same or better voice quality and service reliability than traditional landline service.¹⁴ Another study found 85% of VoIP calls exceed PSTN quality, and that VoIP calls connect quicker than PSTN

¹¹ TURN’s proposed service of quality standards do not distinguish or even attempt to identify differences in “interconnected VoIP” and non-interconnected VoIP. TURN’s proposal appears that it would apply to all VoIP technologies.

¹² Interconnected VoIP service means only those VoIP services that are substitutes for traditional telephone services – *e. g.*, only intrastate VoIP services offered to the public for a fee that permit users to receive calls from and terminate calls to the public switched telephone network. In-bound one-way VoIP services, for example, may utilize a telephone number but does not allow the user to make calls to the public switched telephone network.

¹³ If the CPUC wanted to pursue whether there were appropriate quality of service standards for interconnected VoIP, it will need to conduct additional proceedings and workshops to obtain evidence on the technology, the services provided, and reasonable service standards. There has been no showing the VoIP technologies act in the same manner as wireline technologies, particularly with respect to service provisioning, restoration of service, and other quality of service issues. Specific input would have to be solicited from VoIP carriers (which may or may not be certificated before the Commission) to ensure that the CPUC has the full breadth of VoIP offerings and varying methods by which VoIP is operationally provided. It is only at that time, that the CPUC could consider proposing potential standards. At this time, there is no evidence supporting the reasonableness of TURN’s proposed service standards on VoIP. A full and complete evidentiary record would have to be created. Again, however, it is premature for the Commission and VoIP carriers to expend such resources until the FCC has definitively ruled on its jurisdiction over VoIP, the role of state regulatory agencies (if any), and whether it will apply service of quality standards on VoIP. Given the Commission’s previous reticence to impose regulatory schemes on VoIP and likely expenditure of time and resources, it is simply premature for the CPUC to consider the specific TURN proposals.

¹⁴ March 2006 survey by Telephia.

calls¹⁵. Likewise according to J.D. Powers, while customer satisfaction with traditional phone providers fell slightly, new entrant cable operators selling VoIP had subscriber satisfaction scores 30 points above the overall industry.¹⁶

As a result, the VON Coalition submits that it is premature and inappropriate for the CPUC to implement service quality standards on VoIP providers at this time. This Commission recognized that it was premature to act in light of the *Vonage Order*, and to date, no additional event has taken place that would change that conclusion. VoIP can play a critical role in boosting broadband demand, putting new tools in the hands of consumers and small businesses to enhance productivity, manage daily affairs, and enjoy leisure pursuits. The VON Coalition looks forward to working with the Commission to forge pragmatic solutions that enable consumers, businesses, and the economy to achieve the full promise and potential that VoIP can deliver. However, this proceeding is not the proper time or forum to establish service quality standards for VoIP.

Dated and Signed: June 15, 2007

Respectfully submitted,

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¹⁵ According to Minacom's, August, 2006 Standards-Based, North American & Global VoIP Testing Study, VoIP service had a an average Mean Opinion Score (MOS) of 4.2, compared to 3.9 for the PSTN - MOS is a scale commonly used to describe speech quality, ranging from 1 (worst) to 5 (best). In addition to superior sound quality, calls over VoIP connected quicker overall - 8.2 seconds on average, compared to 8.9 seconds for those placed over the PSTN.

http://www.minacom.com/modules/minaweb/download/Internet%20Phone%20Quality%20Increases%20Significantly%20and%20Steadily%20_2_.pdf

¹⁶ Customer satisfaction with traditional phone providers fell 3.3% in 2005 to 670 on a 1,000-point scale, according to J.D. Powers. Cable operators entering new markets, many selling broadband and VoIP, had subscriber satisfaction scores 30 points above the overall industry. Comm Daily 7-13-06

CERTIFICATE OF SERVICE

I, Anita Taff-Rice, certify under penalty of perjury under the laws of the State of California, that the following is true and correct.

I am a citizen of the United States, State of California, am over the age of eighteen years of age, and am not a party to the within cause. On June 15, 2007, I served the following document via electronic mail to the addressees on the California Public Utilities Commission's electronic mail service list for R. 02-12-004:

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Executed this 15th day of June 2007.

/s/Anita Taff-Rice_____

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[Top of Page](#)
[Back to INDEX OF SERVICE LISTS](#)