

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Request for Review by)	WC Docket No. 06-122
MeetingOne.com Corp. of Decision by the)	
Universal Service Administrative Company)	

REPLY COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net Coalition (VON Coalition)¹ hereby submits these brief reply comments in response to the petition filed by MeetingOne Corp, seeking review of a decision of the Universal Service Administrative Company that MeetingOne is subject to universal service contribution obligations for its IP audio conferencing services.²

According to the petition, MeetingOne customers can participate in live conference calls, record their conference calls and retrieve those recordings from MeetingOne servers as desired. MeetingOne states these services are provided exclusively over the Internet. Though users' calls may originate as TDM, calls are converted by a third party telecommunications carrier into IP packets before they are sent to the MeetingOne network (composed of gigabit Ethernet circuits) over the Internet. MeetingOne allows the packets onto its network using session initiation protocol and

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP enabled communications. VON Coalition members are developing and delivering voice and other communications applications that may be used over the Internet. VON Coalition members include AT&T, Cisco, Google, iBasis, Microsoft, Skype, T-Mobile, Vonage and Yahoo.

² Public Notice, DA 10-793 (rel. May 7, 2010), announcing that reply comments in this matter are due on or before June 22, 2010.

real-time transport protocol, where they are combined with other packets associated with the specific conference.³

The VON Coalition is not taking any position on whether MeetingOne should contribute to the Universal Service Fund (“USF”), but submits that any Commission decision on the MeetingOne petition should specifically delineate the limits of USF application to collaboration and conferencing services. Online collaboration tools are information services as defined by the Communications Act, are today exempt from USF, and they should continue to be exempt.⁴ However, the very existence of MeetingOne’s petition, which was the result of MeetingOne’s uncertainty regarding the limits of USF applicability, demonstrates that this clarification is necessary. Although the industry understands that revenues from information services are not included within the assessment for USF contributions, there continues to be uncertainty regarding the limits of those information services with respect to collaboration and conferencing. Therefore, the Commission should use this opportunity to provide this much-needed clarity.

Specifically, the Commission should confirm that any service that includes a bundle of collaborative features that are information services -- such as PC-to-PC VoIP, document sharing, desktop sharing, instant messaging and video conferencing – should remain exempt from USF, even if the service includes a feature that would allow PSTN users to join a collaboration session. The FCC cannot expand USF to include contributions from information service providers without specific Congressional changes

³ MeetingOne Corp. Request for Review of Universal Service Administrator Decision, CC Docket No. 96-45, filed May 3, 2010, at 3-4.

⁴ The 1996 Act creates a distinction between “telecommunications services” and “information services.” The first consists of pure transmission services offered to end users without change in form or content, and subject to common-carrier regulation. 47 U.S.C. § 153(43). The second, in contrast, offers the ability, for example, to store, retrieve, utilize and/or manipulate “information.” 47 U.S.C. § 153(20). Information services are not subject to regulation under Title II of the Communications Act. See, National Cable & Telecommunications Assn. v. Brand X Internet Services, 545 U.S. 967, 970 (2005).

