

## **VON Statement for the Iowa Utilities Board's August 9, 2016 Meeting**

Good morning. My name is Joseph Cohen and I represent the Voice on the Net Coalition, or "VON" Coalition. The mission of the VON Coalition is twofold:

1. To advocate for public policies that support the availability and adoption of Internet communications products, including Voice Over Internet Protocol and other IP-enabled applications, products, and services that consumers access over broadband and the Internet, and
2. to educate its members on regulatory and policy issues of business importance.

To facilitate its mission, the VON Coalition focuses on several key objectives, including:

- Education of regulators, legislators and media worldwide about Internet communications opportunities, technologies, products, benefits, and practices;
- Recommending action on regulation and legislation that affects the interests of the Internet communications industry;
- Providing a forum for discussion by the members of the Internet communications industry, to educate on important legal and regulatory policy issues, and encourage the exchange of ideas.

Members of the VON Coalition include a broad range of companies like Microsoft, Google, Skype, and Vonage. A complete listing of our members can be found on our website: [von.org](http://von.org).

The Board's proposals to deregulate VoIP assume that VoIP is a telecommunications service subject to Board regulation. Throughout this proceeding, the VON Coalition has maintained that, because interconnected VoIP is an information service, it is exempt from regulation by the Board. Under federal law, information services are exempt from telecommunications regulation, which includes state regulation.

While the FCC has asserted limited jurisdiction over interconnected VoIP services, it has not treated interconnected VoIP as a traditional telecommunications service. It has also not granted the states authority to impose specific obligations on interconnected VoIP providers, other than state Universal Service Fund obligations and the payment of state and local fees to support 911.

Instead of merely deregulating VoIP, which the Board does not have the authority to regulate in the first place, the Board should follow the lead of at least 31 states and the District of Columbia and codify a regulatory safe harbor for VoIP. Specifically, the Board should adopt the safe harbor proposed by AT&T, CenturyLink, and Verizon that would change the definition of "telephone utility" to make clear that VoIP is not regulated. States that have already adopted safe harbors realize that there is no benefit to imposing legacy telephone regulations on VoIP, and that doing so may cause the loss of investment. The Board should consider the actions of these states and adopt a VoIP safe harbor of its own. Thank you.