

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

In the Matter of)	
)	
VCXC Petition For Notice of Inquiry On The)	GN Docket No. 13-5
Migration to HD Voice)	
)	
)	

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net Coalition (“VON”)¹ hereby submits these comments in response to the Voice Communication Exchange Committee (“VCXC”) Petition for Notice of Inquiry on the migration to high definition (HD) voice.² VON supports the petition because the implementation of HD voice can provide consumers with the enhanced voice quality they desire, rejuvenate user interest in voice calls, and improve competitiveness of global communications infrastructure—all within the existing structure of the Internet Protocol (IP) transition. To advance its core missions of supporting innovative technologies, ensuring competition, and serving the public interest in high-quality communications options, the Commission should issue a Notice of Inquiry and begin the process of migrating to HD voice.

I. The Benefits of Migration to HD Voice Are Significant.

HD voice technology will provide users with a significantly improved quality of voice communications.³ Standard definition voice services can’t meet the increased requirements of the twenty-first century consumer. The Public Switched Telephone Network cannot transmit

¹ The VON Coalition (www.von.org) works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP enabled communications.

² Public Notice, GN Docket No. 13-5, DA 14-713 (rel. May 23, 2014).

³ Alexandra Chang, *How HD Voice Works to Make Your Calls Sound Drastically Better*, WIRED (April 2, 2013) available at: <http://www.wired.com/2013/04/how-hd-voice-works-to-make-your-calls-clearer/>.

most frequencies in the human hearing range, as it covers just 200 Hz to 3,300 Hz.⁴ Transition to HD voice technology will double the resolution of calls and transmit frequencies from roughly 70 Hz to 7,000 Hz, a range more closely aligned to the human ear's capabilities.⁵

By providing the listener with a greater range of frequencies, HD voice will allow users to hear nuance and have clarity they've never experienced before. HD voice calls will decrease background noise, lessen misunderstandings, and minimize the need to ask speakers to repeat themselves.⁶ These features are particularly important for the elderly or those with a hearing disability. For those who have trouble hearing, HD voice will provide high fidelity calls that are easier to understand. Improved sound quality is also important for those who have a visual impairment, because voice calls can serve as their primary form of communication.

HD voice will also increase revenues needed to upgrade and maintain networks. Since 2000, there has been a 50 percent drop in the use of the PSTN,⁷ which is due, at least in part, to the increasing use of text messaging, email, and Internet-based communications alternatives. HD voice should boost demand for voice services, which in turn will increase revenue for network operators.⁸ These revenues can then be re-invested into network upgrades and maintenance, which are vital to ensure long-term infrastructure needs are met.

II. The Commission Can Facilitate the Transition to HD Voice

No individual network operator can implement the shift to HD voice on its own because of the nature of the technology and the interworking of networks. For both parties to receive an

⁴ *Id.*

⁵ *Id.*

⁶ Eric A. Taub, *Remedies for Better Cellphone Signal and Quality*, THE NEW YORK TIMES, June 26, 2013, available at: <http://www.nytimes.com/2013/06/27/technology/personaltech/remedies-to-enhance-cellphone-signal-and-sound-quality.html>

⁷ Richard N. Clarke, *The Case For Reforming Regulation of PSTN Voice Services*, 2 J. OF INFORMATION POLICY 287 (2012)

⁸ See Voice Communication Exchange Committee, *FAQ*, (June 19, 2014, 1:45pm), <http://vcxc.org/faq.html>.

HD-quality connection, a call must be completed entirely within networks transitioned to HD voice capabilities.⁹ The Commission is in the best position to assist the industry in transitioning to HD voice, particularly as it navigates the transition to IP networks.

The Commission should facilitate the transition to HD voice through a process modeled on the DTV transition.¹⁰ As with HD voice, the DTV transition involved a risk of fragmentation; but after the Commission took the lead, industry and consumers rallied together to make the migration a success. The same reaction will occur when the public begins to understand the advantages of improved voice call technology.

CONCLUSION

The Commission should recognize the benefits of the HD voice—vastly improved voice call quality, boosted consumer demand for voice calls, and increased revenue for network maintenance—and take the lead ushering in a new era of voice calls. The Commission has the successful DTV transition as the blueprint for implementation. For these reasons, VON encourages the Commission to issue a Notice of Inquiry and begin the migration to HD voice.

Respectfully submitted,

VOICE ON THE NET COALITION

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⁹ Chang, *supra* note 3.

¹⁰ See *generally*, Federal Communications Commission, Digital Television (June 19, 2014, 11:55am), <http://www.fcc.gov/digital-television>.