

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Proceeding to Consider) Rulemaking 22-08-008
Changes to Licensing Status and Obligations of)
Interconnected Voice over Internet Protocol Carriers)

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net Coalition (“VON”)¹ hereby submits these brief comments in response to the Assigned Commissioner’s Amended Scoping Memo and Ruling in the second phase of the above-captioned proceeding.² These comments are timely filed pursuant to the schedule adopted in the Ruling.³

Background

The Ruling seeks comments on technical and implementation issues that have arisen in the application of the new regulatory framework for interconnected VoIP providers, including the definition of facilities for interconnected VoIP providers. More specifically, the Ruling asks what telecommunications facilities are utilized to provide nomadic-only interconnected VoIP services including to originate and/or terminate voice traffic to the public switched telephone network.⁴ VON provides the following in response to two questions in the Ruling.

¹ VON is a trade association that advocates for a fresh approach to regulation for Internet communications. For more information, see www.von.org.

² Assigned Commissioner’s Amended Scoping Memo and Ruling (the “Ruling”), R.22-08-008 (issued April 3, 2025).

³ Id. at page 6 (establishing a comment deadline of April 28, 2025).

⁴ Id. at pages 3-4.

Discussion

1) What facilities are involved when nomadic-only interconnected VoIP service providers on-ramp and off-ramp voice traffic to the Public Switched Telephone Network?

Response:

The facilities involved, if any at all, when nomadic-only interconnected VoIP service providers on-ramp and off-ramp voice traffic to the PSTN turns not on the nomadic or fixed nature of the provider but on whether the provider has obtained its own numbers directly from the NANPA, owns its own facilities to host phone numbers, *and* has entered into direct interconnection agreements with other carriers to exchange traffic between networks.

Most nomadic-only VoIP providers are not facilities-based: they do not obtain their own numbers, own or operate the telecommunications infrastructure needed to host those numbers, or have direct interconnection agreements with other voice providers. Instead, they obtain numbers from third-party voice network providers and rely on those providers to host the phone numbers. Those third party providers own the necessary telecommunications infrastructure and have entered into the interconnection requirements necessary for them to on- and off-ramp traffic to the PSTN.

When a user of a non-facilities based nomadic VoIP provider makes a phone call, the VoIP provider hands the call off to its third-party provider, who will then on-ramp the call to the PSTN. For incoming calls, the third party provider will receive the call from the PSTN, and then off-ramp the call from the PSTN to hand it off to the VoIP provider, so the VoIP provider can deliver the call to its user.

Some nomadic-only VoIP providers may obtain numbers directly from NANPA. These providers may be facilities-based, and may host those numbers on their own networks. Any provider that hosts its own numbers would likely have facilities somewhere in the United States. Those providers likely have entered the interconnection agreements necessary for them to handle the PSTN connections themselves. These facilities need not be in California for a nomadic-only VoIP user to make and receive

calls from California telephone numbers.

2) If at all, how does the “cloud-based architecture and dynamic, flexible infrastructure,” which party comments described as being used in the provision of nomadic-only interconnected VoIP service, rely upon telecommunications infrastructure?

Response:

The cloud-based architecture used by nomadic-only VoIP providers’ to deliver service to their users does not rely on any telecommunications infrastructure. Nomadic-only providers do not have a physical connection to the end user. Instead, their customers rely on a separate data connection to access the nomadic VoIP service, similar to how the user would access any other internet application. The end customer connects to the VoIP providers’ cloud architecture via any data connection or internet connection, which is generally secured by the customer from a third party of the customer’s choosing.

Conclusion

VON looks forward to working with the Commission and interested parties in the second phase of this proceeding. Please contact the undersigned should you have questions.

Respectfully submitted,

Voice on the Net Coalition

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