

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

In the Matter of

Advancing IP Interconnection	)	WC Docket No. 25-304
Accelerating Network Modernization	)	WC Docket No. 25-208
Call Authentication Trust Anchor	)	WC Docket No. 17-97

**COMMENTS OF THE VOICE ON THE NET COALITION**

The Voice on the Net (“VON”) Coalition<sup>1</sup> hereby submits these comments in response to the Notice of Proposed Rulemaking (the “NPRM”)<sup>2</sup> in the above-referenced dockets, wherein the Commission seeks comment on proposals that would facilitate the transition from TDM to IP-based networks and encourage interconnection between IP networks. VON strongly supports the Commission’s push for all-IP interconnection. VON submits these comments to (1) explain the benefits of all IP networks, including anti-fraud controls and NG911, and (2) encourage the Commission to use its existing statutory authority to mandate complete IP-interconnection. VON recommends against taking up the classification of VoIP in this proceeding or revisiting the Commission’s decades’ old decision to pre-empt state regulation of VoIP.

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<sup>1</sup> The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of internet communications. See [www.von.org](http://www.von.org).

<sup>2</sup> *Notice of Proposed Rulemaking*, WC Docket No. 25-304, WC Docket No. 25-208, WC Docket No. 17-97 (rel. October 29, 2025); see also, 90 Fed. Reg. 54266 (November 26, 2025) (establishing a comment date of December 26, 2025). The comment date was extended to January 20, 2026. See, Second Order Granting Extension of Time, DA 25-1065 (rel. December 16, 2025).

## **Current Landscape and Benefits of all IP Networks**

For most of the voice communications ecosystem, the transition to all IP networks has happened organically as consumers and businesses have migrated from TDM networks to VoIP services delivered over cable, fiber, or wireless infrastructure. Today, there are more than 64 million interconnected VoIP subscriptions (representing almost 80 percent of fixed line services), while traditional switched services have declined to about 18 million access lines.<sup>3</sup>

Customers opt for VoIP over traditional telephony because VoIP offers more robust services and features, such as enterprise cloud PBXs, AI integrations, multi-factor authentication and security features, voicemail-to-email, multi-channel communications, and the ability to take phone numbers anywhere as calls can be received and originated over any internet connection.

The industry has moved to IP networks because they more readily support voice, video, and data services on a unified, packet-based platform. IP networks offer better call quality and higher redundancy at lower costs than traditional TDM networks. They are also necessary for the ubiquitous availability of NG911 services and to realize the full benefits of the STIR/SHAKEN framework. As long as TDM continues to exist in the network, these benefits cannot be realized; for example, STIR/SHAKEN attestations will continue to be stripped from the SIP headers. Full IP-interconnection will ensure that signed/authenticated calls reach the terminating carrier with all necessary data intact, including in the future, rich

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<sup>3</sup> See *NPRM* at para. 1; Voice Telephone Services Report: Status as of June 30, 2024, at page 2, issued May 2025 and found at <https://docs.fcc.gov/public/attachments/DOC-411462A1.pdf> (last visited December 24, 2025).

call data.<sup>4</sup>

For these reasons, VON members, along with the Commission and a broad cross-section of the communications industry, support full IP-interconnection. In earlier phases of this proceeding, VON encouraged the Commission to require all voice service providers (“VSPs”) to transition to IP networks by December 31, 2028, or two years after the effective date of rule adopted in this proceeding, whichever is later.<sup>5</sup> This deadline, over nine years after the passage of the TRACED Act, aligns with other Commission proposals in this proceeding,<sup>6</sup> and provides VSPs additional time to update their networks.

**The Commission Should Rely on Its Plenary Authority Over Numbers to Mandate IP-Interconnection**

The Commission seeks comments on the appropriate regulatory framework for interconnection for IP voice services, including the scope of traffic and services that framework should encompass, and whether there should be a duty to interconnect or to negotiate in good faith.<sup>7</sup> The Commission should use its existing authority under Section 251 to require timely IP-IP interconnection for all *numbered voice* services. Section 251(e)(1) provides the Commission with plenary authority over the North American Numbering Plan. The Commission has historically relied on this authority to grant interconnected VoIP providers direct access to numbers and to impose conditions on their use of those numbers.<sup>8</sup>

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<sup>4</sup> *NPRM* at paras. 11-15.

<sup>5</sup> Comments of the Voice on the Net Coalition, WC Docket No. 17-97 (filed July 16, 2025) at 1.

<sup>6</sup> *NPRM* at paras. 16, 44.

<sup>7</sup> *NPRM* at paras. 55-64.

<sup>8</sup> *Numbering Policies for Modern Communications*, Report and Order, 30 FCC Rcd 6839, para. 78 (2015) (granting providers direct access to numbers); Telephone Number Requirements for IP-Enabled Services Providers; Local Number Portability Porting Interval and Validation Requirements; IP-Enabled Services; Telephone Number Portability; Numbering Resource Optimization, WC Docket Nos. 07-243, 07-244, 04-26, CC Docket Nos. 95-116, 99-200, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd

A mandate for IP voice interconnection is a logical and necessary outgrowth of this authority to ensure the efficient routing of numbered traffic.

In addition, the TRACED Act granted the FCC authority to require that *all voice service providers* implement the STIR/SHAKEN caller ID authentication framework in their IP networks regardless of technology used.<sup>9</sup> The FCC has expressly acknowledged that a complete IP transition is necessary to ensure full implementation of STIR/SHAKEN,<sup>10</sup> and thus mandating IP interconnection is not only reasonable but necessary for the FCC to fulfill its statutory obligations under the TRACED Act.

Importantly, rooting the Commission's authority to compel IP interconnection in its plenary authority over numbers makes clear that the IP interconnection mandate should apply solely to *numbered voice services*. This framework enables the FCC to oversee interconnection of numbered voice services without creating market distortions, and allows the FCC to act decisively on these essential services without trying to create new rules for number-independent IP voice services or other non-voice IP traffic.<sup>11</sup> These markets are functioning effectively today.

Because the Commission can rely on its clear authority under Section 251 and 227b, it need not address VoIP classification at this time. Any reconsideration of VoIP classification should only happen in a dedicated proceeding that can consider and address the myriad

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19531, 19550, para. 19, 21, 35 (2007) (requiring porting to and from VoIP providers); Call Authentication Trust Anchor, Second Report and Order, 35 FCC Rcd 3241, para. 42 (2020) (requiring entities that use NANP numbers to verify caller identity); IP-Enabled Services; E911 Requirements for IP-Enabled Services Providers, First Report and Order, 20 FCC Rcd 10245, para. 26 (2005).

<sup>9</sup> TRACED Act, Public Law 116-105 (2019) at Section 4(b); see also 47 U.S.C. 227(b)(1) and 47 CFR 64.6301.

<sup>10</sup> *NPRM* at para. 14.

<sup>11</sup> *NPRM* at para. 57.

technical and legal issues tied to classification. The Commission also need not revisit state pre-emption, which was clearly settled more than 20 years ago, when it recognized that VoIP was inherently an interstate service and should be pre-empted from state regulation.<sup>12</sup>

### **Interconnection Requirements and Mandates**

VON recommends that the Commission keep many of the current interconnection rules in place. For example, providers should be required to negotiate IP interconnection for voice services in good faith. As noted in the NPRM, the requirement to negotiate in good faith “has been a longstanding element of interconnection requirements under the Communications Act,” regardless of technology.<sup>13</sup> While much of the industry has voluntarily negotiated IP interconnection agreements, the Commission should reaffirm this requirement and make clear providers cannot impede interconnection negotiations.<sup>14</sup>

The Commission should also protect against anti-competitive pricing or interconnection requirements by applying the existing bill-and-keep rules adopted in 2011.<sup>15</sup> Bill-and-keep has allowed the industry to move away from a complex system of intercarrier compensation to a simpler, more efficient framework benefiting both service providers and their customers. It is also well suited for modern IP-based networks that can facilitate access from any destination with minimal additional cost.

VON also recommends that all providers who hold an OCN be required to interconnect

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<sup>12</sup> See *Vonage Holdings Corp. Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, WC Docket No. 03-211, Memorandum Opinion and Order, 19 FCC Rcd 22404, 22411, (*Vonage Order*).

<sup>13</sup> *NPRM* at para. 61.

<sup>14</sup> See, e.g., Reply Comments of the Voice on the Net Coalition, WC Docket No. 17-97, filed August 15, 2025, at 3; Comments of Competitive Carriers Association, WC Docket 17-97, filed July 16, 2025, at 4; Comments of NTCA, WC Docket 17-97, filed July 16, 2025, at 13.

<sup>15</sup> See, Report and Order, CC Docket No. 01-92 (2011), 76 FR 78384 (December 16, 2011); see also, 47 CFR § 51.701-§ 51.715.

on reasonable terms with any provider who requests interconnection. OCN holders should be able to contract their interconnection obligation to third-parties, for which all third-party costs should be borne by the OCN holder and not passed on to competitive providers. This model will enhance competition and ensure that new and innovative providers can enter the market.

### **CONCLUSION**

The Commission should act in accordance with the recommendations herein

Respectfully submitted,

**VOICE ON THE NET COALITION**

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