

**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

REPLY COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits this reply to comments filed in response to the Notice of Proposed Rulemaking (the “NPRM”)² in the above-referenced dockets. There is widespread support for the transition from TDM to IP-based networks and for policies that encourage interconnection between IP networks involved in the provision of numbered voice services. VON submits these reply comments to (1) strongly support the Commission’s push for all-IP interconnection by a date certain; (2) note that Commission oversight of the IP-transition is necessary to ensure reliable access to communications; (3) recommend that the Commission apply the existing good faith negotiation and bill-and-keep rules to IP networks; and (4) agree with the majority of commentators that the classification of VoIP should not be addressed in this proceeding.

¹ 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.

² *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 reply comment date was extended to February 19, 2026. See, Second Order Granting Extension of Time, DA 25-1065 (rel. December 16, 2025).

Commission Oversight is Necessary to Ensure the Transition to IP Networks by a Date Certain and that Networks Remain Operational During the Transition

As many commentators point out, a rapid cutover from TDM to all IP-interconnection could negatively impact communication networks, especially in rural America, and could negatively impact 911 availability.³ VON agrees with these commentators that Commission oversight of the IP transition is necessary. VON would support a plan to keep current interconnection rules in place as the Commission finalizes and phases in a new IP-interconnection regime. VON recommends that the Commission have clear milestones and deadlines to ensure that ILECs and CLECs prioritize moving towards full IP-interconnection by a date certain.⁴

As part of this oversight, the Commission must ensure that providers do not use network security to improperly block traffic. As a general matter, VON agrees that IP-interconnection rules should permit providers to cut off traffic when necessary to maintain the security of networks, such as during a DDoS attack. USTelecom and Verizon go further and argue that they should have the right to block "junk traffic." VON notes that there is no accepted definition of "junk traffic" and recommends against allowing individual providers to unilaterally determine that traffic is "junk" and can be blocked.⁵ Such broad discretion could

³ Comments of Intrado, WC Docket No. 25-304 at 3 (January 20, 2026); Comments of Industry Council for Emergency Response Technologies, WC Docket No. 25-304 at 4 (January 20, 2026); Comments of NENA: The 9-1-1 Association, WC Docket No. 25-304 at 1-2 (January 20, 2026); Comments of Bandwidth, WC Docket No. 25-304 at 5 (January 20, 2026); Comments of Indigital Telecom, WC Docket No. 25-304 at 6-9 (January 20, 2026); Comments of Comtech Communications Corp., WC Docket No. 25-304 at 3 (January 20, 2026).

⁴ VON recommends that all voice service providers transition to IP networks by December 31, 2028, or two years after the effective date of rules adopted in this proceeding, whichever is later. Comments of the Voice on the Net Coalition, WC Docket No. 25-304 at 3 (January 20, 2026).

⁵ Comments of Verizon, WC Docket No. 25-304 at 7 (January 20, 2026); Comments of USTelecom, WC Docket No. 25-304 at 40 (January 20, 2026).

result in impermissible throttling of legitimate traffic, depriving individuals of reliable communications and undermining competition.

Therefore, any ability to block traffic for network protection and security must be narrowly tailored to ensure that blocking is permitted only in limited and clearly defined circumstances and only where required for network security.

Good Faith Negotiations and Bill and Keep

In its initial comments, VON recommended that the Commission keep many of the current interconnection rules in place, including a requirement to negotiate IP interconnection for numbered voice services in good faith and for the exchange of traffic on a bill-and-keep basis.⁶ 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.⁷ The Commission should reaffirm this requirement and make clear providers cannot impede interconnection negotiations.

While many voice service providers have voluntarily negotiated IP interconnection agreements, there are exceptions. As noted by Bandwidth, many ILECs have been unwilling to accept IP interconnection, despite increasingly utilizing IP within their own networks.⁸ Home notes that small providers have been unable to enter into discussions regarding IP interconnection with larger providers, and when they do, the smaller providers are offered

⁶ Comments of the Voice on the Net Coalition, WC Docket No. 25-304 at 5 (January 20, 2026).

⁷ *NPRM* at para. 61.

⁸ Comments of Bandwidth, WC Docket No. 25-304 at 4 (January 20, 2026). See also Comments of INCOMPAS, WC Docket No. 25-304 at 11 (January 20, 2026) (noting that expectations that all providers negotiate agreements in good faith have not materialized); Comments of Intrado, WC Docket No. 25-304 at 4 (January 20, 2026) (noting that there is typically no meaningful ability to negotiate with ILECs, which leverage facilities to raise TDM prices while delaying SIP migration).

take it or leave it conditions.⁹ CVC cautions against taking any action that would enable incumbents to dictate terms and impose untenable conditions on competitive providers.¹⁰

In cases where providers do not negotiate IP interconnection in good faith, the Commission should exercise its existing enforcement authority to resolve disputes expeditiously. While adoption of the Commission's proposals in this proceeding and overall network efficiency should provide the largest incumbents the incentives to complete the transition to all-IP, the Commission must have in place guardrails for those circumstances when incumbents may have financial or other competitive reasons for refusing requests for IP interconnection or offering only unreasonable terms and conditions.¹¹ The availability of an expedited complaint process is necessary if market forces or regulatory fiat fail.

The Commission should also protect against anti-competitive pricing or interconnection requirements by applying the existing bill-and-keep rules adopted in 2011.¹² 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 numbered voice service networks

⁹ Comments of Home, WC Docket No. 25-304 at 27 (January 20, 2026). See also, Comments of Competitive Carriers Association, WC Docket No. 25-304 at 7 (January 20, 2026) (noting that some of its members are entirely denied interconnection by incumbents at any rates or terms); Comments of ICG, WC Docket No. 25-304 at 4 (January 20, 2026) (noting that one ILEC required TDM tandem trunking and refused a request for IP interconnection).

¹⁰ Comments of CVC, WC Docket No. 25-304 at 4-5 (January 20, 2026).

¹¹ See, Comments of Lumen, WC Docket No. 25-304 at 28 (January 20, 2026) (Commission should reiterate its expectation that providers have a duty to negotiate in good faith and make clear that the FCC remains a backstop to hear complaints.); see also Comments of T-Mobile, WC Docket No. 25-304 at 11 (January 20, 2026) (The Commission could also consider serving as a backstop to interconnection negotiations during the transition, in order to discourage unreasonable refusals to interconnect in IP and to help ensure that IP interconnection negotiations are conducted in good faith, consistent with the Commission's expectations).

¹² See, Report and Order, CC Docket No. 01-92 (2011), 76 FR 78384 (December 16, 2011); see also, 47 CFR § 51.701-§ 51.715.

that can facilitate access from any destination with minimal additional cost.

There is overwhelming support in the record for bill-and-keep.¹³ As USTelecom states, “There is no reason for the Commission to authorize any regime other than bill-and-keep for calls routed over the internet or exchanged at a provider’s designated IP interconnection point(s). In addition, with bill-and-keep as the default, the Commission can also reasonably expect that most negotiated two-party agreements will also adopt bill-and-keep.”¹⁴

Other commenters offer similar views, recognizing that in an all-IP environment, the local/long distance distinction disappears, and IP networks support a bill-and-keep framework where providers recover costs from their own customer rather than per-minute termination charges. Bill-and-keep also aligns incentives toward efficiency, investment, and consumer value.¹⁵

VoIP Classification

In its initial comments,¹⁶ VON recommended that the Commission use its existing authority under Sections 251(e)(1) and 227(b) to require timely IP-IP interconnection for all *numbered voice* services. Relying on Section 251(e)(1), which provides the Commission with plenary authority over the North American Numbering Plan, a mandate for IP voice interconnection is a logical and necessary outgrowth of this authority to ensure the efficient

¹³ On January 28, 2026, the Commission released a draft notice of proposed rulemaking, that if adopted, would move remaining intercarrier compensation charges to a bill-and-keep framework. See, Notice of Proposed Rulemaking, WC Docket Nos. 25-311 and 25-208, FCC-CIRC2602-04 at 2-3 (January 28, 2026). The Commission should consider combining these proceedings to better address the overlapping issues.

¹⁴ Comments of USTelecom, WC Docket No. 25-304 at 21 (January 20, 2026).

¹⁵ Comments of ICLE, WC Docket No. 25-304 at 7 (January 20, 2026); Comments of ICG, WC Docket No. 25-304 at 12 (January 20, 2026); Comments of INCOMPAS, WC Docket No. 25-304 at 29 (January 20, 2026); Comments of Lumen, WC Docket No. 25-304 at 28 (January 20, 2026).

¹⁶ Comments of VON, WC Docket No. 25-304 at 3-5 (January 20, 2026).

routing of numbered traffic. Section 227(b) requires that *all numbered voice service providers* implement the STIR/SHAKEN caller ID authentication framework in their IP networks, and instructs the FCC to “take reasonable measures ... to enable as promptly as reasonable full participation of all classes of providers of voice services and types of voice calls.”¹⁷

STIR/SHAKEN is dependent on IP to function, and Congress’ goal of “full participation” cannot be achieved unless and until numbered voice calls are transmitted over all-IP networks during and at the completion of the transition; thus, mandating IP interconnection is not only reasonable but necessary for the FCC to fulfill its statutory obligations and critical in preventing fraud and scam on voice networks.

The Commission should not classify VoIP in this proceeding because this proceeding is focused on how phone networks operate.¹⁸ VoIP is a service offering that allows customers to connect to those networks. Commentators who support reclassification of VoIP, namely NTCA, Public Knowledge, Vantage Point and Home Telecom do not explain how classification of a service offering affects the Commission’s authority over interconnection of phone networks or would augment the Commission’s ability to move forward with the IP-transition.¹⁹

Addressing the myriad of federal and state implications of VoIP classification would unduly delay this proceeding and the resulting IP-transition. Taking a quick hit approach as suggested by NTCA and classifying **all** VoIP services as telecommunications ignores Commission precedent, Commission regulations, and the Communications Act recognizing critical

¹⁷ 47 USC § 227b(B)(5)(D).

¹⁸ The issue of VoIP classification should only happen in a dedicated proceeding that considers the wide variety of technical and legal issues tied to classification. Comments of the Voice on the Net Coalition, WC Docket No. 25-304 at 4 (January 20, 2026).

¹⁹ Comments of Home Telecom, WC Docket No. 25-304 at 2, 29 (January 20, 2026); Comments of Vantage Point, WC Docket No. 25-304 at 9 (January 20, 2026); Comments of Public Knowledge, WC Docket No. 25-304 at 7, 9 (January 20, 2026).

distinctions between non-interconnected VoIP,²⁰ one-way VoIP,²¹ and over-the-top or nomadic VoIP services.²² The broad stroke application of Title II, and the imposition of statutory obligations nearly 100 years old that were crafted for a monopoly telecommunications market would not serve the public interest.

Further, classification of interconnected VoIP as a telecommunications services would undermine the benefits of state preemption accorded to interconnected VoIP providers by the *Vonage Order*. State public commissions would likely initiate proceedings to require interconnected VoIP providers to obtain certificates of public convenience and necessity, and impose a slew of state specific obligations on companies that provide a nationwide (worldwide) service, untethered by geographic boundaries. At least four states, Arizona, Colorado, Maryland and Rhode Island, are considering legislation that would reassert the state regulatory commission's authority over interconnected VoIP.²³ Rather than classify interconnected VoIP as a telecommunications service, the Commission in this proceeding should reaffirm the federal policy of state preemption of VoIP, allowing providers to continue innovating and driving demand for IP-enabled services without the burden of managing 50 state regulatory frameworks.

²⁰ *Petition for Declaratory Ruling that pulver.com's Free World Dialup is an Unregulated Service*, WC Docket No. 03-45, Memorandum Opinion and Order, 19 FCC Rcd 3307 (2004) (finding that a computer-to-computer service is an information service); see also 47 USC § 153(36) (defining non-interconnected VoIP).

²¹ See 47 CFR § 9.3 (paragraph (2) within the definition of Interconnection VoIP service applies 911 requirements (but no other regulatory obligations) to one-way VoIP providers that that permit users generally to terminate calls to the public switched telephone network defining non-interconnected VoIP).

²² See 47 CFR § 9.11(b) (applying different obligations to fixed and nomadic VoIP services).

²³ See Maryland Senate Bill 605, Colorado, House Bill 26-122, Rhode Island House Bill 7333 and Arizona House Bill 2930.

CONCLUSION

The Commission should act in accordance with the recommendations herein

Respectfully submitted,

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February 19, 2026