

VoIP Coalition Warns of Excessive Regulation

June 9, 2011

In late May, the Voice on the Net Coalition ("VON") held a series of meetings with FCC Commissioner's offices concerning VoIP regulations. The Coalition discussed topics affecting 21 pending FCC dockets, and, according to the [summary of the meetings](#), "expressed concern that additional regulation of the IP communications industry could deter investment and innovation ...". The Coalition opposed a variety of new regulations:

- The Coalition opposed imposition of intercarrier compensation obligations to VoIP and argued for bill and keep for VoIP traffic;
- The Coalition opposed using advertising revenues to assess TRS obligations on VoIP providers;
- The Coalition opposed requirements to file broadband deployment reports (Form 477) and to apply FCC billing rules to VoIP;
- The Coalition urged a narrow interpretation of new disability access requirements and supported "broad waivers" of such rules; and
- The Coalition opposed the opening of a rulemaking to require E911 for mobile VoIP applications.

The Coalition also attached a [chart summarizing FCC actions](#) to regulate interconnected VoIP services. The chart mirrors the [summary we prepared](#) back in November of the regulatory obligations of VoIP services. VON's summary chart identifies 8 pending proceedings proposing to add regulatory obligations to VoIP service providers and details 13 previous FCC orders regulating VoIP services. Since the Coalition prepared its chart, the FCC added one more proposed obligation: a proposal to require interconnected VoIP providers to report their international traffic and revenues. See [Kelley Drye's Client Advisory](#) on the international reporting obligations for more details.