Before the
Federal Communications Commission
Washington, D.C.

In the Matter of	:	
	:	
Connect America Fund	:	**WC Docket No. 10-90**
	:	
A National Broadband Plan of Our Future	:	**GN Docket No. 09-51**
	:	
Establishing Just and Reasonable Rates for	:	
Local Exchange Carriers	:	**WC Docket No. 07-135**
	:	
High-Cost Universal Service Support	:	
	:	**WC Docket No. 05-337**
Developing a Unified Intercarrier	:	
Compensation Regime	:	**CC Docket No. 01-92**
	:	
Federal-State Joint Board on Universal	:	
Service	:	**CC Docket No. 96-45**
	:	
Lifeline and Link-Up	:	
	:	**WC Docket No. 03-109**

COMMENTS
SUBMITTED ON BEHALF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO

Dated: March 31, 2011

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INTRODUCTION AND SUMMARY

On February 9, 2011, the Federal Communications Commission (FCC) released a Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking (collectively, NPRM) intended to facilitate the modernization and streamlining of the FCC's universal service fund and intercarrier compensation policies with the underlying goal of bringing "affordable wired and wireless broadband – and the jobs and investment they spur – to all Americans while combating waste and inefficiency." [1] Following four core principles,[2] the NPRM proposes several near-term and long-term reforms designed to achieve this goal. Among these are reforms found in Section XV of the NPRM to reduce inefficiencies and waste by curbing arbitrage opportunities related to voice over internet protocol (VoIP) traffic, phantom traffic and access stimulation. The FCC established a separate comment cycle for Section XV with comments being due no later than April 1, 2011 and reply comments due no later than April 18, 2011. Comments for all other sections are due by April 18, 2011 with reply comments due by May 21, 2011. Accordingly, the Public Utilities Commission of Ohio (Ohio Commission) submits its comments pertaining to Section XV for the FCC's consideration.

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1 Federal Communications Commission, *FCC Proposes Modernizing and Streamlining Universal Service* (News Release) (rel. February 8, 2011).

2 *See In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing and Unified Intercarrier Compensation Regime, Federal State Joint Board on Universal Service, Lifeline and Link-Up*, WC Docket No. 10-50, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109 (Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking at 7-8, ¶ 10) (rel. February 9, 2011) (NPRM). The four principles include modernizing the FCC's universal service fund (USF) and intercarrier compensation (ICC) system for broadband; exercising fiscal responsibility to control the size of the USF; requiring accountability of companies receiving support, and; transitioning to market-driven policies.

DISCUSSION

I. Intercarrier Compensation Obligations for VoIP Traffic

In Section XV of the NPRM, the FCC seeks comment on the appropriate intercarrier compensation framework for VoIP traffic.[3] As the FCC has recognized, the absence of clear direction regarding the intercarrier compensation obligations associated with VoIP traffic, combined with the continuous growth in consumer demand for VoIP services, has led to arbitrage opportunities and resulted in numerous billing disputes and litigation between carriers.[4] This lack of guidance has also served as a disincentive for carrier innovation and migration to more efficient networks.[5] Accordingly, comment is sought on "how to define the precise nature and timing of particular intercarrier compensation payment obligations" associated with VoIP traffic.[6] The Ohio Commission believes that addressing intercarrier compensation treatment of *all* VoIP traffic is both important and very timely and it appreciates the FCC's efforts in this regard.

Intercarrier compensation obligations for VoIP traffic is not a new issue for the Ohio Commission. Five years ago, through a section 252 arbitration case, the Ohio Commission addressed the issue of intercarrier compensation of facilities-based "fixed"

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[3] NPRM at 191, ¶ 608.

[4] *See id.* at 191-192, ¶ 608.

[5] *See id.*

[6] *Id.* at 192, ¶ 609.

interconnected VoIP traffic that originates from a fixed geographic location.[7] In the ensuing years, interconnected VoIP traffic has grown to include not only "fixed" traffic but "nomadic" traffic as well. Unlike "fixed" VoIP traffic, "nomadic" VoIP traffic may originate at any location where a customer has access to a broadband connection without regard to the geographic location of the service. This difference notwithstanding, both "fixed" and "nomadic" interconnected VoIP traffic rely equally on, and make use of, the terminating carrier's network. As such, there is no basis for exempting "nomadic" interconnected VoIP traffic from intercarrier compensation obligations. Consequently, the Ohio Commission believes that it is proper to include "nomadic" interconnected VoIP traffic in this proceeding.

The FCC asks whether it can and should immediately apply the bill-and-keep methodology to interconnected VoIP traffic through the application of the section 215(b)(5) framework.[8] In doing so, the FCC noted that section 251(b)(5) of the Telecommunications Act (Act) requires local exchange carriers (LECs) "to establish reciprocal compensation arrangements for the transport and termination of telecommunications," and that interconnected VoIP traffic is "telecommunications" traffic, regardless of whether interconnected VoIP service is classified as a telecommunications service or as

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7 *In the Matter of TelCove Operations, Inc.'s Petition for Arbitration Pursuant to Section 252(b) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, and Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Ohio Bell Telephone Company d/b/a SBC Ohio*, Case No. 04-1822-TP-ARB (Arbitration Award) (rel. January 25, 2006).

8 NPRM at 195, ¶ 615.

an information service.[9] The Ohio Commission agrees with the FCC that VoIP traffic is telecommunications traffic because it involves "the transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information as sent and received."[10] By recognizing VoIP traffic as telecommunications traffic, the Ohio Commission believes that it is logical for the FCC to bring interconnected VoIP traffic within the section 251(b)(5) framework. However, bringing VoIP traffic within this framework does not necessarily allow the FCC to apply the bill-and-keep methodology to it since determining whether this methodology is just and reasonable would remain a state jurisdictional issue under the Act.[11]

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9 NPRM at 195, ¶ 615.

10 47 U.S.C. § 153(43) (2010). While the Ohio Commission recognizes that the transmission of VoIP traffic involves a different switching, transmission and signaling protocol (packet switching using internet protocol) than that of tradition public switch network traffic (circuit switching using TDM and SS7), it agrees that VoIP traffic is telecommunications traffic under section 153. *See In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Contribution Methodology, Numbering Resource Optimization, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Developing a Unified Intercarrier Compensation Regime, Intercarrier Compensation for ISP-Bound Traffic, IP-Enabled Services*, WC Docket No. 05-337, CC Docket No. 96-45, WC Docket No. 03-109, WC Docket No. 06-122, CC Docket No. 99-200, CC Docket No. 96-98, CC Docket No. 01-92, CC Docket No. 99-68, WC Docket No. 04-36 (Comments Submitted on Behalf of the Public Utilities Commission of Ohio at 8-12) (filed November 26, 2008).

11 *See* 47 U.S.C. § 252(d)(2); *Iowa Utilities Bd. v. FCC*, 120 F.3d 753, 796 (8th Cir. 1997) *rev'd in part and remanded on other grounds, AT&T v. Iowa Utilities Bd.*, 525 U.S. 366 (1999). "[T]he Act plainly grants the state commissions, not the FCC, the authority to determine the rates involved in the implementation of the local competition provisions of the Act…[W]e believe that the 1996 Act, when coupled with section 2(b), mandates that the states have the exclusive authority to establish prices regarding the local competition provisions of the Act."

As noted above, the reciprocal compensation obligation of section 251(b)(5) only applies to LECs. As such, it is foreseeable that a VoIP service provider might refuse to negotiate in good faith with a LEC to establish a reciprocal compensation arrangement.[12] This would undermine the FCC's efforts to bring VoIP traffic within the framework of section 251(b)(5). Consequently, the Ohio Commission believes that it is imperative that the FCC, should it act to bring VoIP traffic within the 251(b)(5) framework, also amend its rules to clarify that a LEC may request interconnection from a VoIP service provider and invoke the negotiation and arbitration procedures of section 252. In the absence of such an amendment, VoIP service providers would lack any incentive to enter into reciprocal compensation arrangements. In other words, the FCC's rules would impose certain obligations on LECs that are not imposed on VoIP providers.[13] The Ohio Commission does not believe that such a result is the intent of the FCC's proposal to apply the section 251(b)(5) framework.

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12 *See In the Matter of Developing a Unified Intercarrier Compensation Regime, T-Mobile* et al. *Petition for Declaratory Ruling Regarding Incumbent LEC Wireless Termination Tariffs*, CC Docket No. 01-92, 20 FCC Rcd. 4855 (Declaratory Ruling and Report and Order at 4864 - 4865, ¶¶ 15 - 16) (rel. February 24, 2005) (T-Mobile Order). Through the T-Mobile Order, the FCC amended section 20.11 of its rules to clarify that an incumbent LEC may request interconnection from a commercial mobile radio service provider and may invoke the negotiation and arbitration procedures of section 252 to address the possibility that CMRS providers may lack incentives to enter into reciprocal compensation agreements.

13 *See id.* at 4864, ¶ 15.

It has always been the Ohio Commission's position that intercarrier compensation reform should be technologically and competitively neutral.[14] Accordingly, the Ohio Commission believes that the FCC should subject all interconnected VoIP traffic to the same intercarrier compensation charges, i.e., intrastate access, interstate access, and reciprocal compensation that other voice telecommunications service traffic is presently subject to, both during any intercarrier compensation reform transition period and ultimately in the long-term unified intercarrier compensation regime. Such an approach would minimize potential arbitrage opportunities and disputes related to traffic routing and identification, as well as provide incentives for the carrier to invest in the deployment of broadband facilities.

It is not necessary for the FCC to decide the jurisdictional classification of VoIP services prior to rendering a decision on the appropriate statutory framework for VoIP traffic. The costs and benefits shared by the public switch telephone network (PSTN) carriers and IP-based network providers for exchange and termination of VoIP telecommunications traffic does not change with the VoIP service classification. In fact, in the Ohio Commission's opinion, there is no economic or legal justification for making any such connection. Accordingly, any delay in subjecting VoIP telecommunications traffic to the same intercarrier compensation charges as other voice telecommunications traffic serves only to extend the period of uncertainty that causes delay in the deployment of

14 *See In the Matter of Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92 (Comments of the Public Utilities Commission of Ohio at 21-22) (filed October 25, 2006).

broadband facilities. Furthermore, it should not matter whether the VoIP service provider is classified as an enhanced service provider (ESP), Internet service provider or LEC for purposes of determining the appropriate intercarrier compensation for VoIP traffic. In a world transitioning to universal broadband networks, as envisioned in the National Broadband Plan, VoIP service providers should not be exempted from paying intercarrier compensation or access charges. While an exemption for ESPs may have made sense when the FCC issued its *ESP Exemption Order*[15] in 1983, such an exemption makes little sense in today's market of converging technologies that blurs the traditional lines between service providers.

Should the FCC ultimately rely on section 251(b)(5) for the legal authority to require specific intercarrier compensation charges for VoIP traffic, it is the Ohio Commission's position that the actual setting of rates should be left to the states as mandated by the Act.[16] The Ohio Commission recommends that the FCC follow the same process established in sections 251 and 252 of the Act for determining rates for interconnection, unbundled network elements and transport and termination of telecommunications traffic. Using this long-established process, the FCC would determine the parameters, criteria and methodology for the gradual transition of intercarrier compensation for all traffic (intrastate access, interstate access and reciprocal compensation), including VoIP traffic, as well as the parameters for a long-term intercarrier compensation regime, but leave the

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15 *In the Matter of MTS and WATS Market Structure*, CC Docket No. 78-72, 97 FCC 2d 682 (Memorandum Opinion and Order) (rel. August 22, 1982).

16 *See* 47 U.S.C. §§ 251, 252 (2010).

details of implementation to the states.[17] This approach would preserve and promote the established authority of the states to determine the appropriate mechanism(s) to recover intrastate revenue lost during the transition phase as well as determine the ultimate unified intercarrier compensation rates, so long as these charges are rates with section 251 requirements and the FCC's parameters.

II. Rules to Address Phantom Traffic

The FCC notes that the current disparity of intercarrier compensation rates gives service providers an incentive to conceal the source of traffic to avoid or reduce the payment of access charges to the terminating service provider.[18] Accordingly, the FCC proposed to amend its rules to address what is commonly known as "phantom traffic." The Ohio Commission recognizes the problems associated with phantom traffic and supports the FCC's efforts to ensure that LECs, as well as other carriers and service providers, receive call signaling information for traffic terminating on their networks that is sufficient to identify the originating call service provider.

Under the FCC's proposed rule revisions, originating service providers and carriers would be required to provide the calling party's telephone number and would be prohibited from stripping or altering call signaling information.[19] While the FCC's rules currently impose these obligations on service providers and carriers using the Signaling

17 *See Iowa Utilities Bd.* at 796.

18 NPRM at 198, ¶ 620.

19 *Id.* at 201, ¶ 626.

System 7 (SS7) call-signaling system for interstate traffic only, the proposed revisions would extend the existing obligations to all traffic originating or terminating on the PSTN including, but not limited to, jurisdictionally intrastate traffic and traffic transmitted using internet protocols.[20] The FCC seeks comment on its authority to amend its rules as proposed.

The FCC has authority under section 251(d)(1) of the Act to revise its rules as proposed in the NPRM. Pursuant to this section, the FCC must establish regulations necessary to implement the requirements of section 251(b)(5), which, as noted above, requires all LECs to establish reciprocal compensation arrangements for the transport and termination of telecommunications.[21] Since phantom traffic lacks the call signaling information necessary to identify the originating service providers and carriers, LECs are unable to establish reciprocal compensation arrangements for this traffic. Consequently, the FCC may, pursuant to section 251(d)(1), implement any rules necessary to allow LECs to establish reciprocal compensation arrangements.

The Ohio Commission agrees with the approach that the FCC has taken in its proposed rule revisions to address the phantom traffic problem, particularly the problem of phantom traffic produced by VoIP service providers.[22] The proposed rules, while specifically applying to existing technology, provide flexibility for the "successor technologies"

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[20] NPRM at 202, ¶ 629.

[21] *See* 47 U.S.C. § 251(d)(1) (2010).

[22] Over three years ago, the Ohio Commission adopted similar rules for intrastate traffic. *See* Ohio Admin. Code § 4901:1-7-12(B)(2) (West 2010) (eff. November 30, 2007).

that are yet to arrive.[23] Nonetheless, the rules contain one notable omission in that they do not address purely IP traffic. As proposed, the rules would only apply to VoIP service providers that originate traffic on or otherwise send traffic to the PSTN, but would not apply to VoIP service providers that originate and terminate traffic over an IP-based network without touching the PSTN.[24] As the transition is made from the PSTN to IP-based networks, IP-to-IP VoIP traffic will become more and more widespread while the traffic contemplated in the proposed rule will become less prevalent. Accordingly, the Ohio Commission recommends that the FCC clarify that its proposed rule revisions apply not only to VoIP service providers that originate traffic on or send traffic to the PSTN, but also to VoIP service providers that originate and terminate traffic on purely IP-to-IP based networks without touching the PSTN. Otherwise, the FCC will need to revisit this issue again when determining the long-term intercarrier compensation plan.

The rules proposed by the FCC will only be effective in achieving the passage of complete and accurate call-signaling information to the extent that the rules are enforced by the FCC. For this reason, the Ohio Commission recommends that the FCC adopt an enforcement process to ensure compliance. The first step in such a process would be to permit LECs to block traffic that is sent without signaling information. The Ohio Commission has adopted such a requirement as part of its carrier-to-carrier rules.[25] Under the Ohio rule, a LEC may block calls originating and terminating from another service pro-

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[23] *See* NPRM at 240, Appendix B (proposed 47 C.F.R. § 64.1601(a)(1)).

[24] *See Id.*

[25] *See* Ohio Admin. Code § 4901:1-7-12(E) (West 2010) (eff. November 30, 2007).

vider that has neither requested to enter a reciprocal compensation arrangement with the LEC nor been responsive to the LEC's request for interconnection as set forth in section 251(a) and 251(b)(5).[26] Accordingly, as recommended above, the FCC should extend its *T-Mobile* ruling to allow LECs to request interconnection of VoIP service providers as well as invoke the negotiation and arbitration procedures of section 252 should a blocked service provider complain to the LEC, the FCC or a state commission.[27] Following this procedure will either allow LECs to block traffic from unidentified service providers or force these providers to enter into reciprocal compensation arrangements with the LECs. If a reciprocal compensation arrangement is in place, should a service provider mask its traffic such that the LEC cannot identify it, the LEC could block the traffic and, once the originating traffic service provider is identified, the LEC may file a formal complaint with the appropriate state commission to enforce the interconnection agreement's terms and conditions.

While section 251 charges the FCC with implementing its requirements, it also specifically preserves state access regulations that are not inconsistent with that section.[28] As such, intrastate traffic would fall under the FCC's jurisdiction for purposes of establishing regulations necessary to implement section 251(b)(5). Nonetheless, to the extent that a state has adopted interconnection obligations for LECs that are consistent with section 251 and do not substantially prevent its implementation, the FCC may not preclude

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[26] Ohio Admin. Code § 4901:1-7-12(E) (West 2010) (eff. November 30, 2007).

[27] *See* T-Mobile Order at 4864 - 4865, ¶¶ 15-16.

[28] *See* 47 U.S.C. § 251(d)(3) (2010).

the enforcement of such obligations by the state.[29] Consequently, states like Ohio that have adopted rules to address phantom traffic should not be precluded from enforcing their own rules and procedures so long as they are not inconsistent with section 251. For those states that do not have their own rules to address phantom traffic, the FCC, under its section 251 authority, may apply its rules to intrastate traffic in those states.

III. Rules to Reduce Access Stimulation

As pointed out in the NPRM, the current access charge regulatory structure as it applies to LEC origination and termination of both interstate and intrastate traffic has created arbitrage opportunities that take advantage of intercarrier compensation rates by generating elevated traffic volumes to maximize revenues.[30] Through the NPRM, the FCC has proposed specific amendments to its rules that address this access stimulation. The Ohio Commission appreciates and supports the FCC's efforts to minimize these arbitrage opportunities.

As the Ohio Commission stated in prior comments and the FCC recognized in the NPRM, rebates should not be viewed as per se unjust.[31] If a LEC does not seek to recover the costs of indirect or direct access stimulation through the LEC's interstate switched access revenue requirement, then the LEC should not be prohibited from enter-

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29 *See* 47 U.S.C. § 251(d)(3) (2010).

30 *See* NPRM at 204-205, ¶¶ 635- 636.

31 *See In the Matter of Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135 (Comments of the Ohio Public Utilities Commission at 7) (filed December 14, 2007) (Access Rate Comments); NPRM at 213, § 661.

ing into contracts that include offering some otherwise legal form of discount, credit or offset to the customer, or be prohibited from offering services themselves that may generate increases in traffic.[32] In the Ohio Commission's opinion, the problem arises when a carrier or service provider does seek to recover the costs of traffic stimulation through access charges taking advantage of high access rates. If access minutes were treated and billed as other minutes of use, the incentive to recover costs through the access charges would be reduced, minimizing, and perhaps even eliminating, arbitrage opportunities. Nonetheless, under the current access regulatory structure, the Ohio Commission recognizes the need to address access stimulation and the arbitrage opportunities it presents.

To address access stimulation, the FCC has proposed adopting a trigger based on the existence of access revenue sharing arrangements.[33] The FCC's proposal focuses on revenue-sharing arrangements between a LEC assessing access charges and another entity that results in a net payment to the other entity over the course of the agreement.[34] A rate-of-return LEC or competitive LEC that meets this trigger would be subject to modified access charge rules.[35] The Ohio Commission believes that the FCC's proposed trigger is reasonable. This trigger may, however, be difficult to discern where the other entity is an affiliate within the same company or if the LEC modifies the arrangement to avoid consequences. Consequently, the Ohio Commission recommends adding two

[32] *See* Access Rate Comments at 7; NPRM at 213, § 661.

[33] NPRM at 212, ¶ 659.

[34] *Id.*

[35] *Id.*

additional triggers to that proposed by the FCC. Meeting any one of the three triggers would be sufficient to subject the LEC to the FCC's modified access charge rules.

As an additional trigger, the Ohio Commission recommends using an increase in terminating access traffic. The threshold for such an increase should be relatively low, in the range of 25 - 30 percent. The Ohio Commission recognizes that a low threshold such as the one being proposed would easily be reached as a result of normal variations throughout the year. As such, the basis of comparison should be the same month of the preceding year. Additionally, the increase in demand should be observed for three consecutive months before triggering the FCC's modified access charge rules. A third trigger involves the ratio of the LEC's terminating to originating traffic. If this ratio exceeds three-to-one for three consecutive months, the FCC's modified access charge rules would also be triggered.

The Ohio Commission agrees with the approach adopted in the FCC's modified access charge rules. The proposed rule revisions apply to carriers who are National Exchange Carrier Association (NECA) tariff participants as well as carriers filing tariffs under sections 61.38 and 61.39 of the FCC's rules.[36] As such, the Ohio Commission believes that the proposed rule revisions requiring the filing of modified tariffs once the trigger is met should be effective in alleviating arbitrage opportunities. Additionally, the Ohio Commission supports amending section 61.3(aaa) of the FCC's rules to include the two additional triggers it has proposed. Finally, the Ohio Commission believes that its

[36] NPRM at 213-214, ¶¶ 662-664.

earlier proposal limiting the ability of former NECA tariff LECs to return to the NECA tariff once they have filed a tariff as a section 61.39 carrier remains a valid approach to preventing access stimulation arbitrage opportunities.[37] Otherwise, when a revenue sharing arrangement ends, the LEC could return to the NECA tariff without having to reflect the increased access revenue in its 61.39 tariff. The LEC would then be free to enter into another revenue sharing arrangement to take advantage of further arbitrage opportunities.

The FCC noted that some LECs are adopting access stimulation strategies with respect to reciprocal compensation rates.[38] To the extent that arbitrage opportunities exist under reciprocal compensation arrangements, the Ohio Commission recommends that the FCC adopt its proposed trigger as well as the two additional triggers it has proposed to address reciprocal compensation traffic stimulation. The amended rules proposed by the FCC in Appendix C, however, are only applicable to access rates and traffic. As such, for reciprocal compensation access stimulation, the Ohio Commission supports using the bill-and-keep methodology as a viable remedy on an interim basis, subject to true-up, until the appropriate state commission can decide on a case-specific remedy pursuant to the existing interconnection agreement. Additionally, since reciprocal-compensation rates are established through an interconnection agreement, any bill-and-keep arrangement that is adopted on an interim basis must be subject to a change of law provision.

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[37] *See* Access Rate Comments at 11.

[38] NPRM at 217, ¶ 671.

CONCLUSION

Addressing the issues raised in Section XV – intercarrier obligations for VoIP traffic, phantom traffic and access stimulation – are all essential to intercarrier compensation reform. Accordingly, the Ohio Commission appreciates the FCC's efforts to address these issues through the reforms proposed this NPRM. The Ohio Commission is pleased to submit its comments for the FCC's consideration.

Respectfully submitted,

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05-337	In the Matter of Federal -State Joint Board on Universal Service High-Cost Universal Service Support. .. .
01-92	Developing a Unified Intercarrier Compensation Regime.
96-45	FEDERAL-STATE JOINT BOARD ON UNIVERSAL SERVICE
03-109	In the Matter of Lifeline and Link-Up

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