

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: Brian Moline, Chair  
Robert E. Krehbiel, Commissioner  
Michael C. Moffet, Commissioner

DEC 15 2006

 Docket Room

In the Matter of the Investigation to Address )  
Obligations of VoIP Providers with Respect ) Docket No. 07-GIMT-432-GIT  
to the KUSF )

**COMMENTS OF THE  
CITIZENS' UTILITY RATEPAYER BOARD**

COMES NOW the Citizens' Utility Ratepayer Board ("CURB") and files the following comments in this docket related to the Kansas Corporation Commission's ("KCC" or "Commission") November 2, 2006, Order soliciting comments regarding the obligations of VoIP providers with respect to the Kansas Universal Service Fund ("KUSF").

**I. INTRODUCTION**

1. As detailed in the Commission's Order Opening Docket, Assessing Costs, and Soliciting Comments in this docket ("KCC Order"), on June 27, 2006, the Federal Communications Commission ("FCC") released an interim order<sup>1</sup> ("*USF Wireless/VoIP Order*") that *inter alia* required interconnected Voice over Internet Protocol ("VoIP") providers to

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<sup>1</sup> Commission's Report and Order, FCC 06-94, *In the Matter of Universal Service Contribution Methodology*, WC Docket No. 06-122, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms*, CC Docket No. 98-171, *Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990*, CC Docket No. 90-571, *Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size*, CC Docket No. 92-237, NSD File No. L-00-72, *Number Resource Optimization*, CC Docket No. 99-200, *Telephone Number Portability*, CC Docket No. 95-116, *Truth-in-Billing and Billing Format*, CC Docket No. 98-170, *IP-Enabled Services*, WC Docket No. 04-36, 21 FCC Rcd 7518 (2006) (the "*USF Wireless/VoIP Order*").

contribute to the Federal Universal Service Fund (“FUSF”). The interim order has been appealed to the D.C. Circuit Court of Appeals.

2. The *USF Wireless/VoIP Order* stated:

We require providers of “interconnected VoIP services,” as defined by the Commission, to contribute to the federal USF under the existing contribution methodology on an interim basis. As described above, the number of VoIP subscribers in the United States has grown significantly in recent years, and we expect that trend to continue. At the same time, the USF contribution base has been shrinking, and the contribution factor has risen considerably as a result. We therefore find that extending USF contribution obligations to providers of interconnected VoIP services is necessary at this time in order to respond to these growing pressures on the stability and sustainability of the Fund.<sup>2</sup>

3. The *USF Wireless/VoIP Order* also cited the public interest and competitive neutrality as forming the basis for the FCC’s decision.<sup>3</sup>

4. Based on this interim order, the KCC Order requested parties to address, at a minimum, the following areas:<sup>4</sup>

- a. The Commission’s statutory authority to require VoIP providers to contribute to the KUSF.
- b. The ability of VoIP providers to identify local and interstate traffic.
- c. Whether any decision by the Commission to require contributions should differ based on whether a provider adopts the FCC’s safe harbor or utilizes another method to calculate traffic.

5. Interconnected VoIP is a service, sold for a fee, that permits customers to make voice calls to and receive voice calls from the public switched telephone network.<sup>5</sup>

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<sup>2</sup> *USF Wireless/VoIP Order*, ¶ 34.

<sup>3</sup> *USF Wireless/VoIP Order*, ¶¶ 43-44.

<sup>4</sup> CURB notes that, as shown by the History of Kansas Universal Service Fund, available on the KCC website, intrastate estimated industry revenues have been declining since 2002 (Year 6), from \$1,326,562,228, to \$1,204,705,741 in 2006 (Year 10). The KUSF Assessment Rate increased from 3.70 (wireline) and 3.34% (wireless) in Year 6, to 6.07% in Year 10.

<sup>5</sup> 47 C.F.R. § 9.3 states, “An interconnected Voice over Internet protocol (VoIP) service is a service that: (1) Enables real-time, two-way voice communications; (2) Requires a broadband connection from the user’s location; (3) Requires Internet protocol-compatible customer premises equipment (CPE); and (4) Permits users generally to

## II. COMMENTS

### A. The Commission Is Authorized By The Federal And Kansas Telecommunications Acts To Require VoIP Providers To Contribute To The KUSF.

6. The Commission's authority to require VoIP providers to contribute to the KUSF stems from both the Federal Telecommunications Act ("FTA") and the Kansas Telecommunications Act ("KTA").

7. Citing federal statutory provisions governing universal service the *USF Wireless/VoIP Order* states:

The assessment of universal service contributions is governed by the statutory framework established by Congress in the Act. Section 1 of the Act states that the Commission is created "[f]or the purpose of regulating interstate and foreign commerce in communication by wire and radio so as to make available, so far as possible, to all the people of the United States...a rapid, efficient, Nation-wide, and world-wide wire and radio communications service with adequate facilities at reasonable charges," and that the agency "shall execute and enforce the provisions of the th[e] Act." Universal service is a key component in communications policy for ensuring that charges are reasonable. Section 254(b) of the 1996 Act instructs the Commission to establish universal service support mechanisms with the goal of ensuring the delivery of affordable telecommunications services to all Americans. Section 254(b) also provides that Commission policy on universal service shall be based, in part, on the principles that contributions should be equitable and nondiscriminatory, and support mechanism should be specific, predictable, and sufficient. Section 254(d) of the 1996 Act mandates that "[e]very telecommunications carrier that provides interstate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, to the specific, predictable, and sufficient mechanisms established by the Commission to preserve and advance universal service." Section 254(d) also vests the Commission with the permissive authority to require "[a]ny other provider of interstate telecommunications to contribute to the preservation and advancement of universal service if the public interest so requires."<sup>6</sup>

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receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network."

<sup>6</sup> *USF Wireless/VoIP Order*, ¶ 5 (Footnotes omitted.).

8. The FTA also states:

254(f) STATE AUTHORITY.—A state may adopt regulations not inconsistent with the Commission’s rules to preserve and advance universal service. Every telecommunications carrier that provides intrastate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, in a manner determined by the State to the preservation and advancement of universal service in that State. **A State may adopt regulations to provide for additional definitions and standards to preserve and advance universal service within that State only to the extent that such regulations adopt additional specific, predictable, and sufficient mechanisms to support such definition or standards that do not rely on or burden Federal universal service support mechanisms.** (Emphasis added.)<sup>7</sup>

9. The FTA defines a “telecommunications carrier,” in part, as follows:

TELECOMMUNICATIONS CARRIER.—The term “telecommunications carrier” means any provider of telecommunications services, except that such term does not include aggregators of telecommunications services (as defined in section 226).<sup>8</sup>

10. The FTA defines “telecommunications service” as follows:

TELECOMMUNICATIONS SERVICE.—The term “telecommunications service” means the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of facilities used.<sup>9</sup>

11. While the FCC declined to classify VoIP services as “telecommunications services” under the FTA, the FCC did find that interconnected VoIP providers are “providers of interstate telecommunications.” The FCC stated, “...we assert the Commission’s permissive authority to require Interconnected VoIP providers ‘to contribute to the preservation and advancement of universal service’ because ‘the public interest so requires.’”<sup>10</sup>

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<sup>7</sup> 47 U.S.C. § 254(f).

<sup>8</sup> 47 U.S.C. § 153 (44).

<sup>9</sup> 47 U.S.C. § 153 (46).

<sup>10</sup> *USF Wireless/VoIP Order*, ¶ 35.

12. Similarly the Kansas Corporation Commission is charged by the Kansas Telecommunications Act with protecting the public interest. K.S.A. 66-2001 requires the Commission to ensure, “excellent services at an affordable price,” “increased services,” “improved telecommunications facilities and infrastructure at reduced rates” and “telecommunications services that are comparable in urban and rural areas.” The Commission cannot meet these public interest standards if the Kansas Universal Service Fund is not funded adequately.

13. Further, K.S.A. 66-2008 (a) provides, in pertinent part:

(a) The commission shall require every telecommunications carrier, telecommunications public utility, and wireless telecommunications service provider that provides intrastate telecommunications services to contribute to the KUSF on an equitable and nondiscriminatory basis.

14. “Telecommunications carrier” and “telecommunications service” are defined in K.S.A. 66-1,187 (m) and (o) as follows:

(m) “Telecommunications carrier” means a corporation, company, individual, association of persons, their trustees, lessees or receivers that provides a telecommunications service, including but not limited to, interexchange carriers and competitive access providers, but not including local exchange carriers certified before January 1, 1996.

(o) “Telecommunications service” means the provision of a service for the transmission of telephone messages, or two-way video or data messages.

15. While the FCC did not find that interconnected VoIP is a “telecommunications service” *as defined by federal law*, it did determine they were “providers of interstate telecommunications.” Here, consistent with the FCC’s determination, the Commission should find that interconnected VoIP providers should be required to contribute to the KUSF because they are telecommunications carriers *as defined by Kansas law*. Under Kansas law, interconnected VoIP providers provide telecommunications services as defined by K.S.A. 66-

1,187 (o) (“the provision of a service for the transmission of telephone messages, or two-way video or data messages”).

16. If interconnected VoIP providers are not required to pay intrastate universal service fees, the KUSF will continue to lose funding for every customer who chooses to disconnect traditional wireline telephone service and subscribe to VoIP service. This loss in funding occurs in spite of the VoIP provider relying on and directly benefiting from the public switched telecommunications network.<sup>11</sup> The Commission’s universal service obligations do not change in this scenario, only the funding available to carry out the mandates of the KTA.

**B. The Ability Of VoIP Providers to Identify Local And Intrastate Traffic.**

17. The companies providing interconnected VoIP will be able to address their individual capabilities of identifying local and interstate traffic. It may well vary from the ability to identify traffic on a real-time basis, to the necessity of performing periodic traffic studies, to defaulting to the FCC’s safe harbor provisions. The fact that VoIP traffic is being carried over an Internet connection that may at any instant be connected to a website literally anywhere in the world, does not alter the fundamental jurisdictional nature of the call. Using real-time monitoring or traffic studies, the goal, for intrastate traffic, should be to identify all traffic that originates and terminates within Kansas.

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<sup>11</sup> On December 1, 2003, John K. Billock, Vice Chairman and Chief Operating Officer, Time Warner Cable, filed prepared testimony before the FCC. In this testimony he stated, “In order to reach customers not served by Time Warner Cable, calls must at times traverse not only our managed network but also the Public Switched Telephone Network.” (Pg. 3) He further stated, “In addition, Time Warner Cable will support the goals of Universal Service by contributing to both state and federal Universal Service Funds in connection with Digital Phone service.” (Pg. 4) (See <http://www.fcc.gov/voip/presentations/billock.doc>)

C. **The Commission's Decision To Require Contributions Should Not Differ Based On Whether A Provider Adopts The FCC's Safe Harbor Or Utilizes Another Method To Calculate Traffic.**

18. The methodology for determining the amount of intrastate revenues might differ between companies (safe harbor, traffic studies, or real-time data). For example, assuming that the same KUSF assessment percentage is applied to all intrastate revenue, a company using the FCC's safe harbor of 64.9 percent would report 35.1 percent of their total Kansas revenue to the KUSF administrator.<sup>12</sup> A company that does not use the FCC's safe harbor would undoubtedly develop a different intrastate percentage and report a different intrastate revenue number to the administrator. Under any scenario, the KUSF percentage would be applied to the intrastate revenue but would produce different KUSF contributions. These different intrastate revenue calculation methodologies may make estimating the fund more difficult, but CURB recommends a fixed percentage be applied to all intrastate revenues for consistency.

### III. CONCLUSION

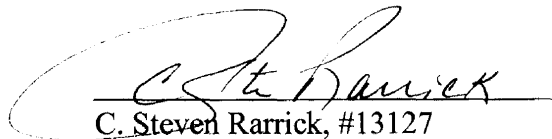
19. Both the federal and state telecommunications acts provide authority for the Commission to require interconnected VoIP providers to contribute to the KUSF. If the Commission fails to exercise its authority to require interconnected VoIP providers to pay intrastate universal service fees, the KUSF will continue to lose funding for every customer who disconnects traditional telephone service and subscribes to VoIP service, even though the VoIP provider relies on and directly benefits from the public switched telecommunications network. CURB urges the Commission to determine that interconnected VoIP providers must contribute to the KUSF pursuant to its authority under both the state and federal telecommunications acts.

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<sup>12</sup> The appropriate level of the FCC safe harbor is an issue that is being addressed in the appeal of the *USF Wireless/VoIP Order*. VoIP providers have proposed safe harbors for interstate revenues of 28.5 percent and 13 percent. This would mean that the corresponding intrastate revenue amounts would be 71.5 percent and 87 percent respectively.

20. CURB appreciates the opportunity provided in this docket to submit comments on behalf of Kansas residential and small business ratepayers, and looks forward to reviewing the comments submitted by other parties.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Steven Rarrick", is written over a horizontal line. The signature is fluid and cursive.

C. Steven Rarrick, #13127  
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**VERIFICATION**

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COUNTY OF SHAWNEE )

C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

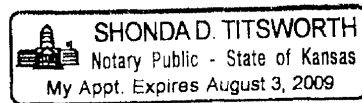
That he is an attorney for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.

  
C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 15<sup>th</sup> day of December, 2006.

  
Notary of Public

My Commission expires: 8-03-09.



**CERTIFICATE OF SERVICE**

07-GIMT-432-GIT

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 15th day of December, 2006, to the following:

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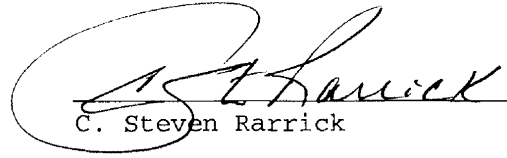
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