

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

Before Commissioners: Susan K. Duffy, Chair  
Shari Feist Albrecht  
Dwight D. Keen

In the Matter of a General Investigation into )  
Interconnection, Porting, Evolving ) Docket No. 20-GIMT-387-GIT  
Technology, and the Impacts on Consumer )  
Choices in Kansas. )

**ORDER OPENING GENERAL INVESTIGATION INTO INTERCONNECTION,  
PORTING, EVOLVING TECHNOLOGY, AND THE IMPACT ON CONSUMER  
CHOICES IN KANSAS**

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed its files and records and being duly advised in the premises, the Commission makes the following findings:

**I. BACKGROUND**

1. On January 18, 2019, IdeaTek filed a Complaint and Request for Expedited Review and Request for Interim Ruling requesting the Commission resolve disputes between IdeaTek and Nex-Tech and its parent company, Rural Telephone Service Co. (Rural). (Rural Complaint).<sup>1</sup> The Commission addressed IdeaTek’s pleading in Docket No. 19-RRLT-277-COM (19-277 Docket). IdeaTek explained when it initially ported customers from Rural in 2018, IdeaTek needed to contact Rural about the routing of local calls for completion to occur. IdeaTek opined Rural completed local calls by utilizing AT&T’s tandem switch trunks.<sup>2</sup> Rural subsequently informed IdeaTek that Rural’s customers’ local calls to IdeaTek customers could not be completed until the companies entered into an interconnection agreement.<sup>3</sup> IdeaTek asserted an interconnection

<sup>1</sup> Docket No. 19-RRLT-277-COM (Docket 19-277).

<sup>2</sup> Rural Complaint, ¶ 9.

<sup>3</sup> *Id.*, ¶ 10 and Exhibit A.

agreement is unnecessary as supported by its indirect connections with at least five other Kansas rural Local Exchange Carriers (LECs).<sup>4</sup> IdeaTek stated the companies reached an interim agreement to complete calls using Session Initiation Protocol (SIP) trunks, however, IdeaTek argued it should not be billed for the SIP trunks<sup>5</sup> because Rural is responsible for its cost to deliver its customers' local calls to IdeaTek.<sup>6</sup> Additionally, IdeaTek, citing 47 CFR § 52.34 and Federal Communications Commission (FCC) Orders, stated Rural must port customers and complete calls to providers, including Voice over Internet Protocol (VoIP) providers.<sup>7</sup> IdeaTek claimed it is technically feasible for Rural to terminate local calls to IdeaTek and that Rural's demands for direct interconnection, payment for the SIP trunks, and its threat to disconnect service are barriers to entry.<sup>8</sup> IdeaTek requested the Commission issue an Order finding: (1) IdeaTek is not required to directly interconnect with Rural in this circumstance; (2) IdeaTek provided proper notice to Rural regarding customer ports; (3) Rural is required to port customers upon receiving a valid request from a provider; (4) Rural must complete its customers' local calls when technically feasible; and (5) IdeaTek does not need to pay the SIP trunk costs.<sup>9</sup>

2. On January 22, 2019, Rural filed its Initial Response to Formal Complaint of IdeaTek (Initial Response).<sup>10</sup> In its Initial Response, Rural stated: (1) IdeaTek initially ported customers improperly; and (2) SIP trunk arrangements were made to ensure local calls are completed.<sup>11</sup> Rural also claimed IdeaTek did not properly address the SIP trunk bills and, instead,

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<sup>4</sup> *Id.*, ¶ 12.

<sup>5</sup> *Id.*, ¶ 14

<sup>6</sup> *Id.*, ¶ 13.

<sup>7</sup> *Id.*, ¶¶ 15-16. See also Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, In the Matter of Telephone Number Requirements for IP-Enabled Services Providers, WC Docket No. 07-243, Rel. Nov. 2007; and Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Connect America Fund, WC Docket No. 10-90, Rel. (Nov. 18, 2011).

<sup>8</sup> *Id.*, ¶ 19.

<sup>9</sup> *Id.*, pg. 10.

<sup>10</sup> Initial Response of Nex-Tech (Rural) to Formal Complaint of IdeaTek, Docket 19-277 (Jan. 22, 2019).

<sup>11</sup> *Id.*, ¶ 1.

filed a complaint after receiving notice that its trunk service would be disconnected for non-payment.<sup>12</sup> Rural stated the parties were negotiating an interconnection agreement and Rural would provide SIP trunk services until the proceeding was concluded, unless otherwise ordered by the Commission.<sup>13</sup>

3. On January 29, 2019, the Commission issued an Order Assessing Costs, in which it found the costs of the proceeding would be assessed equally to IdeaTek and Rural. On January 31, 2019, the Commission issued an Order Designating Examiner for the proceeding.<sup>14</sup>

4. On February 1, 2019, the Examiner issued its *Examiner* Order on Request for Expedited Review and Other Procedural Rulings.<sup>15</sup> The Order determined IdeaTek's request for expedited review was not warranted since the parties reached an interim agreement to port customers and complete local calls. The Order also set a scheduling conference for February 13, 2019, and identified the following issues for consideration:

- 1) Is an interconnection agreement required by a VoIP provider that uses indirect connection to establish service with a rural LEC;
- 2) Are there technical arrangements that may be made through direct connection or indirect connection using third-party facilitation that are equal to or better than the interim provisioning using SIP trunks;
- 3) How did Rural provide local service for its customers prior to the SIP trunk agreement and why is that agreement not sufficient;
- 4) To what extent may reciprocal compensation between a VoIP network and a LEC's network be utilized to permit traffic transport and termination;
- 5) What obligations are imposed under 47 U.S.C. §271(b)(2) and (c)(2) that require local exchange interconnection with a VoIP provider or a data network;
- 6) What costs are imposed on the respective parties to provide transmission and routing for local exchange service provided by a VoIP provider;
- 7) Do the costs of direct connection with a LEC by a VoIP provider create a barrier to competition if an alternative measure of interconnection is technically feasible;

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<sup>12</sup> *Id.*, ¶ 3

<sup>13</sup> *Id.*, ¶ 5.

<sup>14</sup> Order Designating Examiner, Docket 19-277 (Jan. 31, 2019).

<sup>15</sup> Examiner Order on Request for Expedited Review and Other Procedural Rulings, Docket 19-277 (Feb. 1, 2019).

- 8) What, if any pronouncement, has the FCC made regarding interconnection and/or an interconnection agreement between a VoIP provider and a rural LEC;
- 9) Are there any Kansas statutes or Commission orders or regulations that apply to a resolution of this matter or result in a party needing to obtain a Certificate of Authority; and
- 10) What is an appropriate allocation of Commission assessment costs in a complaint matter involving an incumbent local exchange public utility and a VoIP service operator?

5. On February 11, 2019, and February 12, 2019, the two rural LEC associations - the Independent Telecommunications Group, Columbus et al. (ITG)<sup>16</sup> and the State Independent Alliance (SIA)<sup>17</sup> - filed Petitions to Intervene, respectively. ITG's request was based on a claim that a similarly-situated rural LEC may be required to perform duties and incur costs and resolution of the ten issues identified by the Examiner directly affecting ITG's interests.<sup>18</sup> SIA's Petition also claimed intervention rights due to policy questions, including the ten issues identified by the Examiner, which may affect all rural LECs operating in Kansas.<sup>19</sup>

6. On February 12, 2019, IdeaTek filed a Petition for Reconsideration, stating all proceeding costs should be assessed to Rural or, alternatively, the Commission should consider further evidence in the Docket and postpone a final order on the cost assessments.<sup>20</sup> IdeaTek subsequently filed a Motion To Suspend Proceeding,<sup>21</sup> in which it explained Rural and IdeaTek

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<sup>16</sup> Independent Telecommunications Group, Columbus *et al.* Petition for Leave to Intervene, Docket 19-277 (Feb. 11, 2019). The Members of ITG are: Columbus Communications Services, LLC; Cunningham Telephone Company, Inc.; Gorham Telephone Company, Inc.; H&B Communications, Inc.; Home Telephone Company, Inc.; LaHarpe Telephone Company, Inc.; Moundridge Telephone Company, Inc.; Totah Communications, Inc.; Twin Valley Telephone, Inc.; Wamego Telecommunications Company, Inc.; Wilson Telephone Company, Inc.; and Zenda Telephone Company, Inc.

<sup>17</sup> Petition to Intervene of the State Independent Alliance, Docket 19-277 (SIA Petition to Intervene) (Feb. 12, 2019). The members of the SIA are: Blue Valley Tele-communications, Inc.; Craw-Kan Telephone Cooperative, Inc.; Golden Belt Telephone Association, Inc.; Haviland Telephone Company, Inc.; JBN Telephone Company, Inc.; KanOkla Telephone Association; Madison Telephone, LLC; MoKan Dial, Inc.; Peoples Telecommunications, LLC; The Pioneer Telephone Association, Inc.; Rainbow Telecommunications Association, Inc.; S&A Telephone Company, Inc.; The S&T Telephone Cooperative Association, Inc.; South Central Telephone Association, Inc.; The Tri -County Telephone Association, Inc.; and United Telephone Association, Inc.

<sup>18</sup> ITG Petition for Leave to Intervene, ¶ 3.

<sup>19</sup> SIA Petition to Intervene, ¶ 4.

<sup>20</sup> Petition for Reconsideration of IdeaTek Telecom, LLC (Feb. 12, 2019).

<sup>21</sup> IdeaTek Telecom, LLC Motion to Suspend Proceeding, Docket 19-277 (Feb. 15, 2019).

reached resolution of the issues after the February 13, 2019 Scheduling Conference, and requested the proceeding be suspended for three weeks to allow the parties to resolve the terms of the agreement. IdeaTek stated that once the terms of the agreement were finalized, it would file to dismiss the Complaint.

7. On February 21, 2019, the Examiner issued an Order Suspending Procedural Schedule in which the Examiner suspended the proceedings for a period of three (3) weeks.<sup>22</sup>

8. On March 13, 2019, IdeaTek filed a Motion to Dismiss Complaint stating IdeaTek and Rural finalized their agreement and that the parties agreed to equally share the costs of the proceeding.<sup>23</sup> On April 11, 2019, the Commission granted IdeaTek's motion via Order Dismissing Complaint.<sup>24</sup>

9. On March 26, 2019, IdeaTek filed a Complaint and Request for Interim Emergency Relief and Expedited Review seeking an order from the Commission requiring Wamego Telecommunications Company, Inc. (Wamego) to port IdeaTek's customers and take any actions needed to ensure calls are completed between IdeaTek and Wamego's customers (Wamego Complaint).<sup>25</sup> IdeaTek's pleading initiated the proceedings subsequently docketed in Docket No. 19-WTCT-393-COM (19-393 Docket). IdeaTek identified issues similar to those in the 19-277 Docket, *i.e.* failure to port customers and complete local calls and requiring direct interconnection, thus creating a barrier to entry for telecommunications competition.<sup>26</sup> IdeaTek claimed Wamego's actions: (1) impacted the public; (2) were unlawful; and (3) violated Wamego's obligation to deliver originating traffic.<sup>27</sup> IdeaTek explained its indirect interconnection with Wamego through

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<sup>22</sup> *Examiner Order Suspending Procedural Schedule*, Docket 19-277 (Feb. 21, 2019).

<sup>23</sup> *Motion to Dismiss Complaint*, Docket 19-277 (Mar. 13, 2019).

<sup>24</sup> *Order Dismissing Complaint*, Docket 19-277 (Mar. 11, 2019).

<sup>25</sup> *Complaint and Request for Interim Emergency Relief and Expedited Review*, Docket No. 19-WTCT-393-COM (Docket 19-393) (Mar. 16, 2019).

<sup>26</sup> *Id.*, pg. 1.

<sup>27</sup> *Id.*, pg. 2.

AT&T's facilities<sup>28</sup> allows IdeaTek to trade traffic with multiple rural LECs, including Wamego,<sup>29</sup> and allows originating local traffic to be delivered to IdeaTek.<sup>30</sup> IdeaTek stated Wamego also proposed a commercial agreement that is not necessary and Wamego's actions are causing IdeaTek and its customer's economic harm.<sup>31</sup> Consistent with its position in the 19-277 Docket, IdeaTek claimed the Federal Telecommunications Act (FTA), Kansas statutes, and FCC and Commission decisions obligate Wamego to interconnect, port numbers, and complete calls.<sup>32</sup> IdeaTek requested the Commission: 1) find Wamego violated federal and state laws; 2) direct Wamego to port numbers and take all actions necessary to complete calls; 3) impose penalties against Wamego; 4) assess the costs of the Docket to Wamego; and 5) take all other actions deemed necessary and appropriate.<sup>33</sup>

10. On March 29, 2019, Wamego filed an Objection to Jurisdiction, Motion for Dismissal for Want of Jurisdiction, and Contingent Initial Reply Addressing Request for Expedited Procedure (Wamego Motion).<sup>34</sup> In that Motion, Wamego contended IdeaTek's VoIP service is an information service, not a telecommunications service, and IdeaTek is not a telecommunications provider.<sup>35</sup> Citing Kansas law and FCC decisions, Wamego stated: (1) VoIP service is a jurisdictionally interstate telecommunications service; (2) the Commission is pre-empted from any standing to adjudicate the substance of the Complaint;<sup>36</sup> and (3) Wamego is exempt from 47 U.S.C. § 252's interconnection requirements.<sup>37</sup> Moreover, Wamego claimed it: 1) cannot port customers

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<sup>28</sup> *Id.*, ¶¶ 8 - 10.

<sup>29</sup> *Id.*, ¶¶ 9-10.

<sup>30</sup> *Id.*, ¶ 11.

<sup>31</sup> *Id.*, ¶ 14.

<sup>32</sup> *Id.*, ¶ 15.

<sup>33</sup> *Id.*, ¶ 43.

<sup>34</sup> Wamego Telecommunications Company, Inc. Objection to Jurisdiction, Motion for Dismissal for Want of Jurisdiction and Contingent Initial Reply Addressing Request for Expedited Procedure (Mar. 29, 2019).

<sup>35</sup> *Id.*, ¶¶ 5-6.

<sup>36</sup> *Id.*

<sup>37</sup> *Id.*, ¶¶ 15-16.

due to a lack of facilities<sup>38</sup> as recognized by the Commission's grant of a porting obligation waiver;<sup>39</sup> 2) lacks authority to route local traffic through third-party facilities; and 3) requested IdeaTek provide documentation to support its claim that those facilities can be used to transport local calls or, alternatively, enter into a commercial agreement with Wamego.

11. On March 29, 2019, SIA filed a Petition to Intervene claiming the issues in the 19-393 Docket were substantially similar to those in the 19-277 Docket,<sup>40</sup> including practical and policy oriented issues involving VoIP service in a rural LEC's area.<sup>41</sup> Additionally, SIA claimed any determinations in the 19-393 Docket may affect all other rural LECs in the state.<sup>42</sup>

12. On March 29, 2019, ITG filed its Petition to Intervene in which it stated the issues, including the ten issues identified for possible consideration by the Examiner,<sup>43</sup> and factual circumstances raised in Docket 19-277 are the same as those raised in the 19-393 Docket.<sup>44</sup>

13. On April 4, 2019, Commission Staff (Staff) filed its Response to Wamego's Objection to Jurisdiction and Motion for Dismissal for Want of Jurisdiction (Staff Response).<sup>45</sup> In its Response, Staff noted that Kansas statutes mandate customers be accorded number portability and that a telecommunications carrier is entitled to interconnection with a LEC to transmit and route voice traffic regardless of the technology by which the voice traffic is originated by and terminated to a customer.<sup>46</sup> Therefore, according to Staff, under a theory that Wamego's practices are unfair/unreasonable/discriminatory/insufficient or that Wamego's actions constitute a violation

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<sup>38</sup> *Id.*, ¶ 30.

<sup>39</sup> *Id.*, ¶ 31.

<sup>40</sup> Rural Local Exchange Carrier Petition to Intervene (Mar. 29, 2019).

<sup>41</sup> *Id.*, ¶ 4.

<sup>42</sup> *Id.*

<sup>43</sup> Petition of Independent Telecommunications Group, Columbus *et al.*, For Leave to Intervene (Mar. 29, 2019).

<sup>44</sup> *Id.*, ¶ 5.

<sup>45</sup> Staff's Response to Wamego's Objection to Jurisdiction and Motion for Dismissal for Want of Jurisdiction (Apr. 4, 2019).

<sup>46</sup> K.S.A. 66-2003(e); K.S.A. 66-2005(y); see also K.S.A. 66-2003(d).

of the public utilities act, the Commission has jurisdiction to investigate the matter.<sup>47</sup> Additionally, Staff argued the 19-393 Docket did not involve pre-emption, as proffered by Wamego, because the Commission is not regulating VoIP, but rather is regulating Wamego, a regulated LEC.<sup>48</sup> Accordingly, it could be argued that K.S.A. 66-1,191 or K.S.A. 66-1,192's prohibition on unfair or otherwise harmful practices, prohibit the denial of interconnection and number portability regardless of what is required by federal law.<sup>49</sup> Finally, Staff concluded that when looking at federal statutes, there are instances where the FCC has indicated the definition of VoIP is irrelevant. For example, the FCC has specifically required LECs to port numbers to and from VoIP providers because "number portability – whether to and from an interconnected VoIP provider, LEC, or non-LEC carrier – clearly makes use of telephone numbers, implicating 'facets of numbering administration' under section 251(e)(1)..."<sup>50</sup> The FCC has also required all traffic – including VoIP-PSTN traffic – to be subject to § 251(b)(5) (reciprocal compensation for the transport and termination of traffic) on the theory that VoIP providers are providers of telecommunications.<sup>51</sup> Ultimately, Staff requested the Commission find that it has jurisdiction to investigate the subject matter of the 19-393 Docket and deny Wamego's Motion.<sup>52</sup>

14. On April 9, 2019, IdeaTek filed its Reply to Wamego's Objection to Jurisdiction and Motion to Dismiss (IdeaTek Reply) stating its use of VoIP technology is not at issue; rather, the issue is Wamego's failure to port numbers and allow indirect interconnection.<sup>53</sup> According to IdeaTek, this results in Wamego's customers being unable to complete calls to IdeaTek's

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<sup>47</sup> Staff's Response to Wamego's Objection to Jurisdiction and Motion for Dismissal for Want of Jurisdiction (Apr. 4, 2019).

<sup>48</sup> *Id.*, pg. 3.

<sup>49</sup> *Id.*

<sup>50</sup> *Id.* pg. 4.

<sup>51</sup> *Id.*

<sup>52</sup> *Id.* pg. 5.

<sup>53</sup> IdeaTek Reply to Wamego Objection to Jurisdiction and Motion to Dismiss (Apr. 9, 2019).



customers, contrary to Wamego's interconnection obligations to ensure a customer's voice service reaches the Public Switched Telephone Network (PSTN), provide efficient and sufficient customer service, and complete calls.<sup>54</sup>

15. On April 10, 2019, Wamego filed its Reply to Staff Response to Wamego's Objection to Jurisdiction and Motion for Dismissal for Want of Jurisdiction.<sup>55</sup> Wamego's Reply to Staff claimed: 1) VoIP service is an information service over which this Commission lacks jurisdiction; 2) IdeaTek is a VoIP service provider and not a telecommunications carrier; 3) Wamego has no obligation to interconnect with IdeaTek; and 4) Wamego's section 251(b) porting obligations can be resolved if IdeaTek directly exchanges local traffic with Wamego through commercial agreement or indirectly exchanges local traffic with Wamego through another telecommunications carrier.<sup>56</sup>

16. On April 11, 2019, Wamego filed its Response to IdeaTek's Reply<sup>57</sup> in which Wamego reiterated prior arguments and raised the fact that it was granted a number porting waiver in Docket 05-1093.

17. On April 24, 2019, the Scheduling Conference in the 19-393 Docket was held, with the Examiner mediating an agreement between the parties. Under the agreement, Wamego and IdeaTek established temporary direct VoIP interconnection trunk(s) to exchange local traffic. IdeaTek pays 50% of Wamego's retail VoIP trunk rate (\$20.00 per trunk). Wamego and IdeaTek entered the agreement on the understanding that the Commission would open a generic docket to

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<sup>54</sup> *Id.*, ¶ 8.

<sup>55</sup> Wamego Telecommunications Company, Inc. Reply to Staff Response to Wamego's Objection to Jurisdiction and Motion for Dismissal for Want of Jurisdiction (Apr. 10, 2019).

<sup>56</sup> *Id.*, ¶¶ 7, 9.

<sup>57</sup> Wamego Response to IdeaTek Reply, ¶ 12 (Apr. 11, 2019).

investigate the general issues identified by any party or by Commission Staff related to IdeaTek's Complaint.

## **II. LEGAL STANDARDS**

18. Pursuant to K.S.A. 66-1,188, the Commission has general supervisory jurisdiction over local exchange carriers and is empowered to do all things necessary and convenient for the exercise of such power, authority and jurisdiction.<sup>58</sup>

19. Pursuant to K.S.A. 66-101g, all grants of power, authority and jurisdiction made to the Commission shall be liberally construed.

## **III. FINDINGS AND CONCLUSIONS**

20. Based upon the filings and the policy issues raised in the 19-277 and 19-393 Dockets, the Commission has determined a general investigation is necessary to resolve ongoing policies in Incumbent LEC exchanges and study areas. The Commission opens this docket to address the issues raised in Dockets 19-277 and 19-393, within all Incumbent LEC and electing carrier exchanges and study areas, as well as other issues that may be relevant to ensure all consumers, including those in the rural LEC territories, have access to universal services and competitive choices to the extent possible.

21. The Commission makes all of the Incumbent LECs and electing carriers' parties to this general investigation since issues related to their obligations to interconnect, port numbers, and complete calls will be considered. The Commission makes all competitive LECs, wireless, and VoIP providers currently operating in Kansas parties to this Docket since the use of other

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<sup>58</sup> K.S.A. 66-1,188.

providers' facilities to transit traffic, porting and call completion, the role of VoIP technology, as well as barriers to entry to competition, will be considered.

22. Those entities that desire to participate as an active party in this proceeding shall file an Entry of Appearance containing an appropriate email address for electronic service by Thursday, April 2, 2020. Only active parties in this proceeding will be served with pleadings, testimony, briefs, and procedural orders and be allowed to participate in this Docket. However, all entities being served with this Order will be served with any final Commission order. Upon receipt of a Commission final order, an entity that chose not to actively participate in this docket will be allowed to petition for reconsideration, but that entity will not be allowed to introduce new issues inasmuch as it was given notice of the adjudicative proceeding with service of this Order but chose not to participate. If an entity does not enter its appearance in this proceeding by the required date, but later desires to become an active party, that entity may do so by submitting an Entry of Appearance that states whether it is willing to receive electronic service and, if so, provides an email address for service.

23. In order to assist the Commission in its determination, the Commission poses the following questions to the parties of this Docket:

- a. Does the Commission have jurisdiction under the Federal and Kansas Telecommunications Acts to address interconnection issues that include VoIP and IP-enabled technology? What impact does K.S.A. 66-2017 have on the Commission's jurisdiction to address issues related to an Incumbent LEC's and electing carrier obligations for interconnection, including interconnection with providers that use VoIP and IP-enabled technology?

- b. What obligations exist for Incumbent LECs or electing carriers to port customers to a VoIP provider? Does an Incumbent LEC or electing carrier have an obligation to ensure it has facilities in place to port numbers to competitive providers?
- c. What responsibilities do Incumbent LECs, electing carriers, and competitive VoIP providers have to ensure their customers' calls are completed to another provider?
- d. When do the obligations imposed under 47 U.S.C. §251(b)(2) and (c)(2) require direct interconnection with an Incumbent LEC or electing carrier? When is an Incumbent LEC or electing carrier required to allow indirect interconnection with a VoIP provider?
- e. Does the technology used by a competitive provider impact an Incumbent LEC's or electing carrier's obligations to port customers, complete calls, and/or interconnect under Sections 251 and 252? Does an Incumbent LEC's or electing carrier's obligations change when VoIP technology is used? What role, if any, does the technology used by a competitive provider have on its interconnection, porting and call completion obligations?
- f. Under what circumstances is a commercial agreement appropriate? Are there other technical arrangements that may be appropriate to ensure an Incumbent LEC or electing carrier can exchange local traffic with a competitive provider and, specifically, VoIP competitors? To assist the Commission, diagrams of the interconnection points may be provided to illustrate each circumstance.
- g. If a competitive provider has an existing agreement for transiting traffic, can the agreement be modified to include local call routing or are new agreements necessary?

- h. When a competitive provider relies on third-party facilities, should verification of the agreement for transiting traffic be provided to an Incumbent LEC or electing carrier upon request to confirm the authorized use of the facilities?
- i. What impact does evolving technology have on the “technically infeasible” standard?<sup>59</sup>
- j. What costs arise from transiting local traffic between providers? Which provider is responsible for costs for originating local traffic? Are different costs imposed on the respective parties to provide transmission and routing for local exchange service when a provider uses VoIP?
- k. What role does the FCC’s intercarrier compensation reforms play in the transiting traffic costs? How does the FCC’s requirement for all traffic, including VoIP-PSTN traffic, to be subject to Section 251(b)(5) impact the costs arising from transiting local traffic (reciprocal compensation for transport and termination of traffic)? What role does bill-and-keep have in the exchange of LEC/electing carrier to VoIP services?
- l. What role do the number porting waivers granted to the rural LECs for porting numbers to wireless providers play in today’s telecommunications market? Do they remain in effect, should they be voided, or have they been rendered moot through advances in technology?
- m. Should the Commission revisit its Rural Entry Guidelines? Are there specific guidelines that should be modified or eliminated? If yes, which ones?
- n. Other issues that may assist the Commission with its determinations in this Docket.

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<sup>59</sup> 47 U.S.C. §251(c)(2).

23. The issues to be addressed in this proceeding are complex and include not only policies but also technology. The Commission directs parties to include all relevant federal and state statutes, FCC and Commission Order cites and, where possible, provide technology diagrams of direct and indirect interconnection, the role of SIP trunks, and other technology-related diagrams.

**THEREFORE, THE COMMISSION ORDERS:**

- A. The Commission opens this Docket for the reasons discussed above.
- B. The Commission makes the entities noted in the Service List attached to this Order parties to the docket.
- C. Any entity that desires to participate as an active party in this proceeding shall file an Entry of Appearance by Thursday, April 2, 2020, stating whether the party will agree to electronic service and providing an email address as discussed in this Order.
- D. This Order will be served on all Incumbent LECs, electing carriers, wireless providers, VoIP providers, and all competitive LECs.
- E. The cost of this proceeding will be assessed to all Incumbent LECs, electing carriers, wireless providers, VoIP providers, and all competitive LECs.
- F. Comments on the issues identified in Paragraph 23 are due April 30, 2020, and reply comments are due June 4, 2020.
- G. The parties have 15 days, plus three days if service of this Order is by mail, to petition the Commission for reconsideration.<sup>60</sup>

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<sup>60</sup> K.S.A. 66-118b; K.S.A. 77-529(a)(1).

H. The Commission retains jurisdiction over the subject matter and to enter further orders as it deems necessary.

**BY THE COMMISSION IT IS SO ORDERED.**

Duffy, Chair; Albrecht, Commissioner; Keen Commissioner.

Dated: 03/12/2020



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Lynn M. Retz  
Executive Director

PZA

**CERTIFICATE OF SERVICE**

20-GIMT-387-GIT

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of  
first class mail/hand delivered on 03/13/2020.

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20-GIMT-387-GIT

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