



Interconnected/Non-Interconnected VoIP - Definitions

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Background

- While the definition for "*advanced communications services*"(ACS) in 47 CFR §68.3 includes the terms "*interconnected VoIP service*" and "*non-interconnected VoIP service*," these terms are not defined in this section.
 - ACS telephonic CPE. Customer premises equipment used with advanced communications services that is designed to provide 2-way voice communication via a built-in speaker intended to be held to the ear in a manner functionally equivalent to a telephone, except for mobile handsets. *47 CFR §68.3*.
 - Advanced communications services. Interconnected VoIP service, non-interconnected VoIP service, electronic messaging service, and interoperable video conferencing service. *47 CFR §68.3*.
- The ACTA has expressed concern that the lack of definition in the FCC's rules could lead some to misinterpret which types of equipment require registration, specifically equipment that "neither originates nor terminates on the PSTN" may be inadvertently interpreted as not requiring HAC.

Correspondence from the ACTA to TIA TR41.9

- The ACTA sought feedback from TIA TR41.9 on the functional definition of Advanced Communication Services (ACS) as used under the CFR 47 Part 68 regulations.
- The ACTA-adopted technical criteria -- TIA-168-C -- includes the definitions of ACS taken from the FCC's CVAA *Report and Order and Order on Reconsideration* (rel. October 26, 2017), which notes that "interconnected VoIP services enable people to make and receive calls to and from the public switched telephone network (PSTN). Non-interconnected VoIP includes services that enable real-time voice communications that either originate or terminate on the PSTN (but not both) or that neither originate nor terminate on the PSTN. See 47 U.S.C. § 153(25), (36); 47 CFR § 9.3"

Advanced Communications Services (ACS) – Communications services that include interconnected and non-interconnected VoIP services. Interconnected VoIP services enable people to make and receive calls to and from the public switched telephone network (PSTN). Non-interconnected VoIP includes services that enable real-time voice communications that either originate or terminate on the PSTN (but not both) or that neither originate nor terminate on the PSTN.

- TIA believes that the definitions in TIA 168-C "align with the definitions for ACS provided by the FCC."

Relevant Definitions

- The CVAA (PL 111-260) defines advanced communications services to mean "(A) interconnected VoIP service; (B) non-interconnected VoIP service; (C) electronic messaging service; and (D) interoperable video conferencing service."
- The CVAA further notes that:
 - Interconnected VoIP service "has the meaning given such term under section 9.3 of title 47, Code of Federal Regulations, as such section may be amended from time to time;" and
 - Non-interconnected VoIP service "(A) means a service that – (i) enables real-time voice communications that originate from or terminate to the user's location using Internet protocol or any successor protocol; and (ii) requires Internet protocol compatible customer premises equipment – and (B) does not include any service that is an interconnected VoIP service."

Relevant Definitions – Continued

- 47 CFR §9.3 (911 Requirements) defines *interconnected Voice over Internet Protocol (VoIP)* service as a service that: (i) enables real-time, two-way voice communications; (ii) Requires a broadband connection from the user's location; (iii) requires internet protocol-compatible customer premises equipment (CPE); and (iv) permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network. Notwithstanding the foregoing, solely for purposes of compliance with the Commission's 911 obligations, an interconnected VoIP service includes a service that fulfills each of paragraphs (1)(i) through (iii) of this definition and permits users generally to terminate calls to the public switched telephone network.
 - Similarly, 47 CFR 14.10 (l) (Access to Advanced Communications Services and Equipment by People with Disabilities) notes that *interconnected VoIP service* shall have the same meaning as in 47 CFR §9.3.

Relevant Definitions – Continued

- 47 CFR §14.10 (q) defines a *non-interconnected* VoIP service is a service that: (1) Enables real-time voice communications that originate from or terminate to the user's location using Internet protocol or any successor protocol; and (2) Requires Internet protocol compatible customer premises equipment; and (3) Does not include any service that is an interconnected VoIP service.

Conclusion

- While the terms “*interconnected VoIP service*” and “*non-interconnected VoIP service*,” are not defined in 47 CFR §68.3, the definitions found in the FCC’s CVAA *Report and Order and Order on Reconsideration* provide guidance to the industry on these terms.