

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Reforming Legacy Rules for an All-IP Future) WC Docket No. 25-311
Accelerating Network Modernization) WC Docket No. 25-208

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits these brief comments in response to the Notice of Proposed Rulemaking (the “NPRM”)² in the above-referenced dockets. VON strongly supports the Commission’s effort to complete the nation’s transition to all-IP networks and to finish intercarrier compensation (ICC) reform by moving remaining charges to bill-and-keep.

DISCUSSION

More than 15 years after the Commission first began transitioning switched access charges to bill-and-keep, the Commission has appropriately decided that now is the right time to complete that transition. As the industry migrates to IP networks, bill-and-keep will protect against anti-competitive pricing or interconnection requirements. As VON has previously stated, “Bill-and-keep has allowed the industry to move away from a complex system of intercarrier compensation to a simpler, more efficient framework benefiting both service

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of internet communications. See www.von.org.

² *Notice of Proposed Rulemaking*, WC Docket Nos. 25-311 and 25-208 (rel. February 19, 2026) (“NPRM”); see also, 91 Fed. Reg. 14408 (March 24, 2026)(establishing a comment date of May 26, 2026).

providers and their customers. It is also well suited for modern IP-based networks that can facilitate access from any destination with minimal cost.”³

Thus, VON supports Commission proposals to require bill-and-keep while removing all remaining intrastate and interstate originating and terminating access charges, as well as tandem switching and tandem switched transport, dedicated transport, 8YY charges and carrier charges imposed for VoIP-PSTN traffic.⁴ VON agrees that requiring the transition to bill-and-keep will encourage carriers to fully replace legacy TDM equipment with more efficient IP technology, ultimately benefitting consumers. It will also encourage economic efficiency by requiring carriers to look first to their subscribers to cover the costs of the network, then to explicit universal service support, where necessary, rather than complex and inefficient access charges. As the Commission states:

“Under bill-and-keep principles, because customers bear the costs of their carrier of choice, customers receive clearer pricing signals, and consequently, carriers are incentivized to operate more efficiently, to invest in their networks, and engage “in substantial innovation to attract and retain customers.” In turn, consumers then benefit from lower “effective price[s] of calling, through reduced charges and/or improved service quality.”⁵

Bill-and-keep is one critical element of a successful IP transition. The Commission should also 1) require all voice service providers (“VSPs”) to transition to IP networks by December 31, 2028, or two years after the effective date of rules imposing such requirement, whichever is later; 2) require timely IP-IP interconnection for all numbered voice services, including an obligation to negotiate in good faith, making clear that carriers cannot impede

³ Comments of the Voice on the Net Coalition, WC Docket No. 208, at 5 (January 20, 2026) (VON Comments).

⁴ NPRM, at para. 25.

⁵ Id. at para. 27.

interconnection negotiations.⁶ In terms of timing, the Commission should align the transition to bill-and-keep with the obligation to transition to IP networks. The Commission must have clear milestones and deadlines to ensure that ILECs and CLECs prioritize moving towards full IP-interconnection by a date certain.

CONCLUSION

The Commission should act in accordance with the recommendations herein

Respectfully submitted,

VOICE ON THE NET COALITION

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⁶ VON Comments at 3. In cases where providers do not negotiate IP interconnection in good faith, the Commission should exercise its existing enforcement authority to resolve disputes expeditiously.