

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	CC Docket No. 98-170
)	
Truth-in-Billing)	WC Docket No. 04-36

**REPLY COMMENTS
OF
NTCA–THE RURAL BROADBAND ASSOCIATION**

NTCA–The Rural Broadband Association (“NTCA”)¹ hereby submits these reply comments in the above-referenced proceeding pertaining to the request by the Federal Communications Commission (“Commission”) for ways to strengthen existing truth-in-billing rules as they pertain to voice services.²

A number of commenters contended that the Commission should not apply truth-in-billing rules to interconnected VoIP providers, either because the matter requires more study or based upon bald allegations that there is simply no need to do so. These assertions fall short when one considers the evolution of the voice services marketplace. No one seriously disputes that interconnected VoIP services offer many of the same functionalities as traditional wireline

¹ NTCA represents approximately 850 independent, community-based telecommunications companies and cooperatives and more than 400 other firms that support or are themselves engaged in the provision of communications services in the most rural portions of America. All NTCA service provider members are full service rural local exchange carriers (“RLECs”) and broadband providers, and many provide fixed and mobile wireless, video, satellite and other competitive services in rural America as well.

² Consumer and Governmental Affairs Bureau Seeks to Refresh the Record on Truth-In-Billing Rules to Ensure Protection for All Consumers of Voice Services, *Public Notice*, CC Docket No. 98-170 & WC Docket No. 04-36, DA 19-1271 (rel. Dec. 13, 2019).

voice services and, perhaps because of this similarity, are seen as substitutes in the marketplace; consumers' use of interconnected VoIP services has increased significantly for many years running, matched by a continuing decline in traditional telephone services.³ Yet ACA Connects urged the Commission to study the matter further as if VoIP were still an evolving service.⁴ Meanwhile, USTelecom contended “[t]here is no clear public interest benefit that demands applying POTS billing rules to a fundamentally different type of modern voice platform.”⁵

At bottom, the Commission should apply like rules to like services. In this case, interconnected VoIP services provide customers with a service much like traditional wireline service, only using a different underlying technology to deliver voice communications. Accordingly, if the Commission believes that consumers need greater visibility into billing practices for their voice services, the Commission should extend existing truth-in-billing rules applicable to fixed telephone service to interconnected VoIP service. On the other hand, if the Commission does not act to extend such rules, then the Commission should revoke all truth-in-billing rules applicable to traditional wireline voice service as well until such time as the public interest is found to dictate the equal application of such rules to all voice services.

³ See Voice Telephone Services: Status as of December 31, 2018, IAD, OEA (March 2020), available at <https://docs.fcc.gov/public/attachments/DOC-362882A1.pdf> (Over the 3-year period included in the report, “interconnected VoIP subscriptions increased at a compound annual growth rate of 4% ... and retail switched access lines declined at a compound annual growth rate of 12% per year.”).

⁴ Comments of ACA Connects, CC Docket No. 98-170 et al. (Feb. 12, 2020), p. 3.

⁵ Comments of USTelecom, CC Docket No. 98-120 et al. (Feb. 12, 2020), p. 5.

Respectfully submitted,



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