



Update on ACTA Petition for Rulemaking on VoIP Devices

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Background

- During early 2012, the ACTA met with the FCC to discuss the need for greater clarity regarding the registration in the ACTA Database of VoIP devices.
- Upon additional discussion with the FCC, it was recommended that the ACTA file a petition for rulemaking regarding this matter.

Timeline

- In late 2012, the ACTA the drafting the petition began with input from ACTA IS Reps.
- In June 2013, the petition was finalized and filed.
- In August 2013, the FCC issued a *Public Notice* to seek comment on the petition.
 - In response, formal comments were submitted by USTelecom.
 - In addition, informal input was received by the ACTA.
- In September 2013, this input was considered by the ACTA and reply comments were developed and filed.

Input Received

- USTelecom's response to the FCC's *Public Notice*:
 - Suggested that the ACTA's proposed amendment to the definition of terminal equipment could be interpreted to include equipment that has no need for Part 68 certification – such as equipment that could be connected to the PSTN but that is intended to be connected to a network in isolation from the PSTN; and
 - Noted that, if ACTA intended the definition of terminal equipment to encompass equipment that is simply capable of connecting to the PSTN, it should clarify this point.

Input Received (continued)

- Informal input received by the ACTA suggested that:
 - The ACTA provide additional clarity regarding the use cases that the ACTA petition is trying to address (such as equipment with an RJ1/RJ14/RJ45/RJ48 jack that is not intended for use in the PSTN but is improperly used by the consumer).
 - There might be value in modifying the Petition to exclude from the proposed definition terminal equipment that has an RJ11/RJ14/RJ45/RJ48 port but that is intended to be used on a network that is isolated from the PSTN.

ACTA Submits Reply Comments

- The ACTA submitted reply comments in response to the USTelecom comments and other input received; the reply comments:
 - Clarified that the ACTA is recommending that “any equipment that has an RJ11 or RJ14 (or Rj45 or RJ48) port must register with Part 68”;
 - Provided some clarity regarding the scenarios in which equipment has an RJ11/RJ14/Rj45/Rj48 port could be improperly connected to the PSTN; and
 - Recommended that equipment with a keyed jack need not to register with Part 68 (the costs associated with these jack is not anticipated to be significant).

Next Steps

- The Secretariat will continue to monitor this matter and will reach out to the FCC during early 2014 to see if there is any feedback/input to the ACTA petition based on the input it received.