

TELECOMMUNICATIONS ASSOCIATION

Charles H. Helein

General Counsel

Of Counsel:

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8180 Greensboro Drive

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McLean, Virginia 22102

(703) 714-1300 (Telephone)

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Dated: March 4, 1995

Footnotes:

1 47 U.S.C. 201 et seq.

2 The user must hook up a microphone to his computer and either a headset or speakers.

3 ACTA asserts that Respondents are also intrastate telecommunications carriers, subject to regulation by state public utility commissions.

4 The Commission had ordered that respondents, a cable company, generally restrict their carriage of Los Angeles signals to areas served by them on February 14, 1966, pending hearings to determine whether the carriage of such signals into San Diego contravened the public interest. The order did not prohibit the addition of new subscribers within areas served by respondents on February 15, 1966; it did not prevent service to other subscribers who began receiving service or who submitted an accepted subscription request" between February 15, 1966, and the date of the Commission's order; and it did not preclude the carriage of San Diego and Tijuana, Mexico, signals to subscribers in new areas of service. United States v. Southwestern Cable Co., 392 U.S. 157. 180 (1968).

5 Id. at 180.

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CC: FCCMAIL.SMTP("don@veritas.com")

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RECEIVED

From: William Johnson <wjohson@jagat.com>
To: A16.A16(rm8775)
Date: 5/5/96 11:59pm
Subject: RM No. 8775

MAY - 6 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

As a university educator, I am well aware of the importance of the unregulated growth of the Internet. The denial of free access to voice communications, while at first glance it may seem no more than the usual right of the telecommunications concerns, in fact could work to inhibit important possible advances in the use of voice communication in tandem with image and text processing over the Internet.

There are very few areas in which the United States still excels. Computer technology is however among them, and network development most particularly. Let us NOT permit the telecommunications firms, with their backward-looking agenda, sow salt upon this fertile field. Until AT&T and such companies demonstrate SUBSTANTIAL and CLEAR impact upon their ability to profit, I think we must judge this request out of court.

Sincerely,

William A. Johnson (Ph.D. Classical Philology, Yale University)

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FEDERAL COMMUNICATIONS COMMISSION

1996-6-6

From: Douglas Burns <dburns@zoom.com>
To: A16.A16(rm8775)
Date: 5/6/96 12:27am
Subject: RM No. 8775

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

I think the FCC should stay as far away from the Internet as possible. The FCC should not make any rule establishing authority over interstate and international telecommunications services using the Internet. People should be able to talk to anyone over the Internet without the government getting in the way.

The FCC should not give anyone special relief by stoping the provisioning of Internet phone software and hardware. The Internet should not fall under the regulatory requirements of the Communications Act of 1934 and and the FCC should not try to make it.

The FCC should only initiate rulemaking to let the common carriers have more freedom to use the Internet for any and all telecommunications services. I already pay taxes for my data lines I should not have to pay taxes for services and software I choose to use.

Stay away from my data FCC.

Douglas Burns
133 Linmore Dr.
Fremont, CA 94539
510/490-1284

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FEDERAL COMMUNICATIONS COMMISSION

MAY - 6 1996

From: Philip Hodgson <Philip.Hodgson@cs.utas.edu.au>
To: A16.A16(rm8775)
Date: 5/6/96 12:38am
Subject: RM No. 8775

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

To the FCC,

I urge you to reject the petition presented which seeks to control the development of software and hardware for voice transfer on the Internet.

This form of communication is highly unlikely to compete with existing communication carriers in the foreseeable future. It will certainly not impinge upon their (I'm sure healthy) profits.

Yours,
Philip Hodgson

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REC-6 1071

From: Jim Turney <Jim@Look.net>
To: A16.A16(rm8775)
Date: 5/6/96 12:56am
Subject: RM No. 8775

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20541

I want to go on record as opposed to the petition by the America's Carriers Telecommunication Association.

I am in favor of a competitive, unregulated, free market in telecommunications.

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From: Tevis Verrette <student_alaur@netday.campus.mci.net>
To: A16.A16(rm8775),FCCMAIL.SMTP("apple-internet-annou...
Date: 5/6/96 1:07am
Subject: RM No. 8775

RECEIVED
MAY - 6 1996
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20541

Gentlemen:

In reference to Petition RM No. 8775:

On March 4, 1996, America's Carriers Telecommunication Association (ACTA) filed a Petition for Declaratory Ruling, Special Relief, and Institution of a Rulemaking relating to the provision of interstate and international interexchange telecommunications service via the "Internet" by non-tariffed, uncertified entities. ACTA alleges that providers of "Internet phone" software and hardware are operating as uncertified and unregulated common carriers, in contravention of FCC rules, and seeks three forms of relief.

[Snip]

This act is egregious by nature and is an affront to the 1st Amendment to the Constitution of these United States, as well as, confining to basic civil liberties.

Please enter my comment/vote against the aforementioned petition

Respectfully Submitted,

Tevis Anthony Verrette, Ph.D student_alaur@netday.campus.mci.net

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MAY 15 1996

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1721

5/6/96

From: michael walborn <michaelw@crash.cts.com>
To: A16.A16(rm8775)
Date: 5/6/96 2:57am
Subject: rm 8775

FEDERAL COMMUNICATIONS COMMISSION
SECRETARY

As a concerned consumer, I urge the FCC to ignore the ACTA's petition to regulate the internet and to regulate "internet phone" types of software. It's just another example of big business carriers trying to protect themselves against competition. Inexpensive voice phone capability over the internet is very useful to the consumer, especially the international voice call consumer. I don't think america's communications infrastructure is threatened by a few small companies who are smart enough to create software that turns a personal computer into a telephone.

Michael Walborn
4099 Huerfano Ave #210
San Diego, CA 92117-5200 michaelw@crash.cts.com

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MAY - 6 1996

From: Joshua D. Baer <josh@thelorax.res.cmu.edu>
To: A16.A16(rm8775)
Date: 5/5/96 9:08pm
Subject: RM No. 8775

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

I do not think that Internet communication software or hardware falls under FCC regulation in the same way as telephones. If anything should be taxed and regulated at all, it should be the Internet Service Provider. There shouldn't be a distinction between using the Internet for communication or for file transfer, as the difference is almost meaningless, and it is impossible to try and control or regulate. It seems that the phone companies are really just complaining that the technology they have invested billions of dollars in is outdated.

Thanks for listening...

~Josh

So... be your name Buxbaum or Bixby or Bray or Mordecai Ali Van Allen O'Shea, you're off to Great Places! Today is your day! Your mountain is waiting. So... GET ON YOUR WAY!
- Dr. Seuss

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From: Rod Morehead <rmore@Onramp.NET>
To: A16.A16(rm8775)
Date: 5/5/96 9:12pm
Subject: Supressingf flow of information

MAY - 6 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Supressing the flow of information is wrong.

Furthermore, despite what the big phone companies will argue, it cannot be done.

In a fundamental sense, data is data, and voice over the internet is just another way that data is exchanged.

Just the idea of trying to apply the archaic telecom laws to the internet is very scary. Are audio clips voice? How about text which is spoken by a voice synthesizer? How about a net phone product?

If internet data communications needs to be regulated, the new regulations should be drawn up from scratch. Do not apply the old regulations to something that they cannot handle in any coherent way.

--Rod Morehead
rmore@onramp.net
<http://rampages.onramp.net/~rmore/>

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JULY - 6 1996

From: David Dunham <dunham@pensee.com>
To: A16.A16(rm8775)
Date: 5/5/96 9:20pm
Subject: RM No. 8775

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

I do not believe that the FCC should be regulating any part of the Internet. It is purely a means to transmit data. That data might be voice or digital, but there is no reason to consider its meaning. (If the phone company is willing to send my digital data for free and charge only for voice, this petition might make sense.)

A seller of software can hardly be considered a common carrier. They sell a product, not a service. Surely Radio Shack isn't a common carrier merely because they sell telephones

Nobody is charging to make Internet-transmitted phone calls. Voice data is being transmitted using data capacity paid for through other means (typically by a flat fee or hourly rate, paid to an Internet provider). It doesn't make sense to regulate something that's free. And Internet providers merely provide data transmittal. They have no control over what that data is.

This petition would stifle competition and technological advancement. I've never made a phone call over the Internet, but I have done videoconferencing. Somehow the phone companies haven't been able to offer this service.

Much of the Internet traffic is already being transmitted over phone wires, so the members of ACTA are already getting their share.

David Dunham
Pensee Corporation
532 N 71st St
Seattle, WA 98103
Voice/Fax: 206 783 7404 dunham@pensee.com <http://www.pensee.com/dunham/>

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MAY - 6 1996

From: Brad Schrick <brad@brad.net>
To: A16.A16(rm8775)
Date: 5/5/96 9:26pm
Subject: RM No. 8775 -- comment

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

All Internet connections are necessarily carried today by paid connections via certified local, national, and international telephone service providers.

Therefore all needed inspections, fees and regulation with respect to telecommunication have been accomplished when the Internet is used for whatever purpose.

If individuals who use digital telephone services, and those who provide second and third party services as they please, such as paging and answering services, must be individually inspected, tarified, and regulated, where will this burden on the FCC stop?

Regulation is meant to ensure a level playing field and competency, and this has been done.

-- Brad Schrick, Palo Alto, California

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MAY - 6 1996

From: Marcus <xenith@clam.rutgers.edu>
To: A16.A16(rm8775)
Date: 5/5/96 9:27pm

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Stay the hell out of the internet Big Brother. Dont mess with the internet phone. Leave it alone and let it exist. People should be able to communicate for next to nothing.
Mark

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MAY - 6 1996

From: Matt Simerson <matt@michweb.net>
To: A16.A16(rm8775)
Date: 5/5/96 9:41pm
Subject: comments on RM No. 8775

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

I would like to voice my support for NOT regulating the Internet Phone software and it's variants.. For the first time, Americans can freely communicate without tarrifs, and metered costs. It's been nice being able to freely converse with associates hundreds of miles away and not have to worry about getting punished at the end of the month.

Please do not allow the phone companies their continued monopoly. Let's do something in favor of the American people. Free and unrestricted speech.

Matt

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MAY 6 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

From: <tron@megami.veritas.com>
To: A16.A16(rm8775)
Date: 5/6/96 2:44pm
Subject: RM No. 8775

I strongly object to the proposal for restricting use of the internet for sending and receiving live audio data (for example, using so-called internet phone software). This is an important experimental tool which should be allowed to continue to develop and mature.

Right now, the internet is not a threat to the regulated phone companies. First, most internet connections make use of several paid-for hops that go through the phone companies. Second, the current internet infrastructure is not yet readily to scale to very large numbers of users using the internet as a replacement for the phone. Third, internet phones are useful only when the parties involved are sitting at their computers. All of these issues will be solved over time, however. When solved, the internet will be ready to provide a real competitive alternative for local and long-distance telephone service, a competition that is allowed for under the terms of the recent telecommunications bill.

If the FCC does decide to restrict such usage, I urge, at least, a narrow set of restrictions. For example, allow the use of two-way live audio data in conjunction with some other service, such as a game or CU-Seeme-style two-way conferencing. Experimental, non-retail services should be allowed. Also, audio exchanges between internet nodes should be allowed whenever there is some value added facility that is not readily available from the phone company.

--

Ronald S. Karr
tron [-<=>-] tron@veritas.com

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FEDERAL BUREAU OF INVESTIGATION

MAY - 6 1996

From: Stephen Froehlich <Froehlich@arlut.utexas.edu>
To: A16.A16(rm8775)
Date: 5/6/96 2:50pm
Subject: Re: RM No. 8775

FEDERAL BUREAU OF INVESTIGATION
DEPARTMENT OF JUSTICE
OFFICE OF SECRETARY

Internet telephony is no different than any other set of packets on the internet. To try to regulate the flow will be nigh on impossible. Savvy programmers could descise telephony under any number of protocols, from telnet to ftp to http.

On top of that, the distinction between different types of information (data) is quickly blurring in other important ways. A more mature solution to this problem needs to be found instead of looking to laws that were around before computer networking was even an idea.

-- Stephen Froehlich | (512)835-3268
Applied Research Labs: UT Austin | Froehlich@arlut.utexas.edu
PO Box 8029 | (S222)
Austin, TX 78713-8029 |

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FEDERAL COMMUNICATIONS COMMISSION

MAY - 6 1996

From: Neil A. Trilling <neil@csd.uwm.edu>
To: A16.A16(rm8775)
Date: 5/6/96 3:51pm
Subject: Internet Phone Calls

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

I think it would be inappropriate for the FCC to take any action against sellers of hardware and software that enable use of the Internet for voice traffic, long-distance or other. I think we should let the free market model pertain in this matter.

This represents my personal opinion and not that of my employer.

Thank you for listening.

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1996-05-06

11:16:15

From: Andrew Edsor <awde@easynet.co.uk>
To: A16.A16(rm8775)
Date: 5/6/96 4:32pm
Subject: InterNet Phone Software

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Federal Government of the USA may rule against voice software but they have no jurisdiction over the rest of the world. There is thus a danger of the USA losing all the internet traffic that currently passes through it. This is simple sour grapes on the part of the ACTA. Rather childish and illogical considering they are currently accepting the data transmission which carries that voice traffic. If they don't like it they can simply cease providing links for the internet.

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11:17:00
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05/06/96

11/7 - 6 1977

From: Kelvin Johnson <Kelvin1@oo.is.net>
To: A16.A16(rm8775)
Date: 5/6/96 5:00pm
Subject: RM No. 8775

FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

To whom it may concern:

Please understand that the internet is the world greatest means of communicating. It belongs to the people of the world. Please do not take away our freedom of creativity, for it is all we have left.

Kelvin Johnson
Atlanta, Ga. USA

File on Driggs road
11/3/96

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FEDERAL COMMUNICATIONS COMMISSION

MAY 6 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

From: J. S. Kidd <jskidd@value.net>
To: A16.A16(rm8775)
Date: 5/6/96 5:26pm
Subject: Informal Comment on ACTA Petition

The petition filed by ACTA is a last-ditch effort of the old-guard telecommunications industry to maintain it's traditional market structure in a rapidly changing world.

As the Toffer's have so superbly pointed out, we are entering a new age based on information in a global environment. The traditional telecommunications industry MUST NOT be allowed to stifle this inevitable evolution. If they succeed, our advance will be set back by decades at the very least!

Their idea of charging for information transport by physical distance transported is rapidly unraveling, and the ACTA petition is their entrenched response.

I cannot urge too strongly that their petition be denied. They must be brought into the twenty-first century, where BANDWIDTH, not geographic distance, is the major basis of the market. Our future depends on it!

Best regards,

Kurt M. Blackburn
P.O. Box 2450
San Ramon, CA 94583
<jskidd@value.net>

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MAY - 6 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

From: Vance Huntley <vance@webgenesis.com>
To: A16.A16(rm8775)
Date: 5/5/96 9:48pm
Subject: RM No. 8775

To Whom It May Concern-

I would like to address several assertions made by ACTA in regards to "Internet Phone" products and the regulation thereof. All of the references below are to the petition submitted by ACTA, which can be found at <<http://www.von.org/actapet1.htm>>

1. None of these technologies or products allow long distance service to be given away. Network bandwidth is purchased, either by the individual user or by their organization, from Internet Service Providers (ISP's). This bandwidth is a finite resource; if the user is using a "Internet Phone" product they are paying for the bandwidth they are using, and they may not concurrently use that bandwidth for other purposes. Thus, "Internet Phone" products do not allow "long distance service to be given away" -- they are simply less expensive than traditional long distance service.

2. Internet bandwidth is a finite resource, and as such may need to be regulated by the FCC in order to protect consumers and to assure that equal access to this media. However, restricting the type of data sent (e.g. real-time voice vs. email) is not a reasonable way to do this. Also, unilateral attempts at regulation of the Internet are futile; unlike traditional media (e.g. radio) resources on the Internet are not (in general) localized, and thus there are no barriers to moving a regulated service offshore. The FCC must work in concert with other regulatory agencies and with the principal players in the ISP business (i.e. those who are responsible for NAP's) if it is to assemble an enforceable and coherent system of regulation.

3. I believe that the primary beneficiaries of any move at this time to "grant special relief to maintain the status quo by immediately stop the sale of [Internet Phone] software" would be the members of ACTA. The competing service provided by "Internet Phone" products provides more choice for consumers, and may drive down the cost of traditional phone service slightly. I believe this to be in the public interest.

Sincerely,

Vance Huntley

Vance Huntley

Director of Technology & Genesis
WebGenesis, Inc.

vance@webgenesis.com --- 607.255.8499

Check out "The Globe"! --- <http://www.theglobe.com/>

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From: Jack Decker <jack@novagate.com>
To: A16.A16(rm8775)
Date: 5/5/96 11:47pm
Subject: RM No. 8775

MAY - 6 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In Re: RM No. 8775

I am writing in opposition to the America's Carriers Telecommunication Association ("ACTA") petition requesting F.C.C. regulation of voice over the Internet. There are several reasons that I feel this is inappropriate, and certain aspects of it might quite possibly be illegal.

To begin with, there is a question in my mind as to what limitations there might be on F.C.C. jurisdiction in this situation. What ACTA is requesting would in part require a ban on a particular type of software that is used over the Internet, or in the alternative, require the F.C.C. to regulate what type of data may be transmitted via the Internet. There are problems with either approach.

There is no precedent for the F.C.C. to act in such a way as to ban any type of computer software, and such a provision would be difficult if not impossible to enforce, for several reasons. First and foremost, the F.C.C.'s jurisdiction is only within the United States, yet this software can be created and distributed from just about any point in the world.

Also, if a total software package were banned, it would be possible to distribute the software as a series of "building blocks", each of which in itself was either non-functional or performed some legitimate function not related to Internet telephony, but which could be assembled by an end user to create a functioning Internet telephony product. I do not think that the F.C.C. has the budget or the manpower to even begin to cope with all the ways this software could be created and distributed, and please understand that it would always be perfectly legal to make this software available on servers located outside the United States. It would become a challenge to dedicated computer users to find a loophole in these laws, or to simply locate and use this software illegally - indeed, I feel that a ban would only give such software the aura of "forbidden fruit" and perhaps make it even more popular than it is now.

Also, please bear in mind that what you are really being asked to do is insure maximum profits for a particular group of businesses. There is no compelling public health or safety issue here. There has been no evidence presented that Internet telephony products are being used in such a manner as to harm the public interest. The only danger here is to the profit margin of ACTA members. What justification can there be for the Federal Communications Commission to protect the profits of one group at the expense of another? In my opinion, the free market should be allowed to operate here. Any move to protect the profits of ACTA members by limiting Internet telephony would be akin to forcing automobile drivers to subsidize buggy whip manufacturers, or taxing telephone calls to subsidize Western Union.

It is entirely possible that at some point in the future, communications via the Internet may become more popular than telephone communication, but this will not happen for many years, and ACTA members have as much opportunity as anyone else to discern this trend and, if they feel it is appropriate, get into the Internet business. But it would not be right for the government to attempt to simply deny access to an advanced technology in order to protect the investment of those who have a stake in the older technology.

I would now like to address the issue of whether the F.C.C. can or should ban the USE of Internet telephony products. But please allow me to first make one other point regarding F.C.C. jurisdiction, which would apply to both any proposed ban on the software itself, or the use of such software on the Internet.

The F.C.C. is only supposed to regulate interstate communications with the United States. That means that the F.C.C. cannot regulate what happens outside the U.S., nor is the F.C.C. supposed to regulate communications that take place entirely within the borders of a single state. Internet telephony products have legitimate uses in all these situations. For example, such a product could be used on a private company "intranet" (a local network that uses Internet protocols) to allow simultaneous voice and data communications between co-workers in different offices of the same building. This would no more fall within the F.C.C.'s jurisdiction than a private telephone system not connected to the public telephone system would. Or, connections could be made between locations with the same city or the same state, which again would be outside

It is for this reason that I think it would be both inappropriate and illegal for the F.C.C. to act to ban Internet telephony software in its entirety. You may recall that there was a time when it was illegal for consumers to connect their own telephones to the public telephone network, yet it was NEVER illegal for consumers to OWN a telephone, or if they were knowledgeable enough, to build up a local intercom system using telephones. In a similar way, I feel that a ban on ownership of a certain type of software would be inappropriate, of very questionable legality, and virtually unenforceable (especially given that software that already exists can be easily copied and redistributed).

So if the F.C.C. were determined to ban voice over the Internet, the only possibly legal way to do it would be to ban the actual transmission of data containing voice over state lines. But then you have other problems. First, please bear in mind that not all data containing voice patterns would be illegal - what ACTA is asking you to ban is the transmission of voice in real-time. This is an important distinction, because it has always been possible to download voice data that has been created days, months, or even years in the past and then play them on the user's computer using appropriate software. This would be akin to sending a phonograph record or cassette tape via mail or another delivery method, except that the audio is digitized and sent via the Internet. This method of delivering voice data over the Internet has been going on for years, and to my knowledge, no one has ever questioned the legitimacy of doing this.

But the problem here is that there is not that much difference between voice data sent in real-time, and voice data that is stored and sent on demand. At any intermediate point, the two types of voice data would look very similar. Further, either type of voice data could be easily disguised to appear to be some other kind of data - for example, voice patterns stored within a game program, or just random data that is unidentifiable unless you have the proper decryption software. So you would have a couple of problems here. There first would be that you'd in effect have to make a distinction between real-time audio and audio that is stored and downloaded later - but in the real world, the distinction between those two may be very slight. Actually, it is virtually technically impossible to send TRUE real-time audio via the Internet - there is always a delay, sometimes of as much as several seconds, between the time that the sender speaks and the time that recipient hears any voice message. This delay can be as short as a fraction of a second, or as long as several seconds, but it is often quite noticeable.

For that reason, the F.C.C. might be put into the position of having to define what would be a minimum delay that would constitute non-real-time voice. But if that were done, then that delay would also have to be applied to Internet "broadcasters" - those who send one-way audio feeds over the net - and this might cause their product to lose some value to the recipient.

I personally feel that if the F.C.C. were to attempt to ban voice over the Internet, the potential that it would still take place but in an encrypted format is very real. The only way to stop voice transmission over the net would be to stop the transmission of any form of "unknown" data pattern. No Internet Service Provider could possibly "police" their service in such a manner as to ensure that encrypted voice is not being sent over the Internet. You would have to shut down the Internet entirely to truly enforce such a ban. Another thing to keep in mind is that if you set up a situation where users only feel safe in sending encrypted or "disguised" voice over the net, it will encourage the further development of such software, which could make it more difficult for those concerned with national security to monitor voice data should that ever become necessary. I would think that, from a national security standpoint, you would want to encourage voice over the Internet to be carried out in as clear and open a manner as possible, and not to drive it "underground".

It is also worth noting at this point that even if it were TECHNICALLY possible to distinguish real-time Internet telephone data from other data sent over the Internet, such interception and detection (especially by a non-government entity such as an Internet Service Provider) may well violate the provisions of the Electronic Communications Privacy Act.

Another point is that Internet telephone service is, at this point in time, NOT a true competitor to conventional phone service. Barring an emergency situation, telephone companies are expected to complete ALL calls made, in real time, with no delays and no cutoffs due to lack of service. Whereas, with Internet telephone software, any network congestion causes at first delays in speech and "dropouts" (lost syllables or even lost phrases or entire sentences), and if the network congestion gets worse, it degrades to the point that you either have extreme delays in the time it takes the signal to reach the distant end, or such degradation of the voice data that it is impossible to understand what the person on the other end is saying (which condition will actually occur depends on the network protocols used by a particular software product).

Either of these conditions will cause many Internet telephony users to abandon or postpone their conversations. This level of service would be simply unacceptable from a conventional telephone company.