

DO NOT REGULATE VOIP!!!

I would like to start by sharing a story of a recent event, relivent to VOIP, that has effected my life, and may put my opinion into perspective. Two years ago I started construction of our new offices in the Maryland suburbs. Our lot is located about 300 yards away from a major high income housing development. Two years ago we requested phone lines be brought to our in construction offices. Due to an easement issue, it was required to run the cable overhead through the air. The telephone company refused claiming the 300 feet length between existing telephone poles was to far, and it needed to be barried, which was not possible due to the easement dispute and necessary cable path. We spent over a year with lawyers and tens of \$1000s of dollars to attempt to resolve the problem. In January 2004, we were ready to move into our new offices, had a new huge mortgage payment, but we had no phones and could not move in. Our company just built a huge wireless transport network, and we needed staff quickly to promote our offering, but could not hire them until we moved in to our new facility and had somewhere for them to sit. That could not be done until we had phones. We informed Verizon of this, and on January 2004 again requested and insisted Verizon to intall our 4 phone lines between two existing telephone poles through the air. I can't count how many Verizon technicians came out to survey the problem over the months, but never once to lift a wrench. Ironically, we order Cable TV, and within 1 week, they had permits pulled for the use of telephone poles and showed up, and within about two hours after starting, they had the cable TV wire pulled and completed between the poles with no problem. The exact same path Verizon claimed couldn't be done. Sadly, as of today, June 30th, 2004, Verizon has not been able to get us phone lines, and left us with empty promises. Is it just a coincidence, that we are a Wireless ISP provider, a telco competitor? Or are their just alot of Verizon staff members that don't know how to pull cable? What I can say for sure is, tommorrow July 1st, we will have phones, but it won't be on Verizon's circuit switched network, it will be VOIP. Our company, RapidDSL, in the last three weeks, the same amount of time that it took Verizon to have a bucket truck show up on site from the time of request, RapidDSL was able to build out its wireless network to Boyds MD, to not only serve ourselves, but with enough capacity to serve the whole town. We were able to partner with a company like, Broadvox, and place an order for business class VOIP phone lines, and have them provisioned and delivered within 24 hours, at a 30% savings over our previously paid Verizon service. I can also tell you, that in about a week, there will be a new VOIP provider in town, and they won't take 6 months to install their customer's phone lines.

My point here, is not to bash the ILECs. Its to just clearly state, that consumers NEED choices. And competition has to be in existent, for exceptable standards to survive. VOIP can full fill a need for many many American. My story was just one of millions. In my case, VOIP saved my company.

DO NOT REGUALTE VOIP or IP!!! DO NOT HINDER COMPETITION NOR THE FREEDOM FOR INNOVATORS TO INNOVATE!!!

Is it fair, that VOIP isn't regulated, and the ILECS are? So what. The world isn't fair. At least, thats what I was told, Feb 23rd, 2003, after the DSL industry and fair competition was taken away from the third party ISP. Was it fair that I had to put my company on hold for 6 months and lose market share to my competitor because I had no phones?

In order to regulate VOIP, it would put a huge burden on IP service providers, preventing them from making the progress, that they are making today. It would

force us to completely redesign our networks, to accommodate such regulation. Even if it was regulated, how could it even possibly be enforced without stepping on individuals' rights of privacy?

Is the opposition suggesting that IP traffic no longer be able to be encrypted and tunneled? VOIP traffic would be hidden if it were encrypted or tunneled. The Internet and IP is an international issue, and can not be effectively regulated by US government as US Government does not regulate the world. American jobs and enterprises would simply move overseas, and International long distance revenue would just be given to other countries.

What possible benefit could there be to regulate IP? To protect a monopoly that is already unfairly protected? Its odd how the ILECs are allowed to deploy unregulated data services across their telecom networks, but yet they propose that we not be aloud to deploy telecom services across our data networks. Regulation is needed only to prevent the abuse of power or to influence higher standards. I see that ILECs may need some additional regulation to help guarantee this. Third party VOIP providers don't fall into either of those categories today. There is no power to abuse, and third party VOIP providers impose higher standards on themselves, just in order to be able to compete.

The Internet (IP) delivers bits. What types of bits go accross it is irrelevant. The Internet and data networks are strictly a mechanism to convey speech and facilitate communication. And just like any other 1st amendment issue, Free Speech must be protected.

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