Principles of Interconnection

1) There should be symmetry in any interconnection scheme. The goal should be to encourage and promote two-way traffic, or at least, not to encourage business models that favor one-way traffic delivery based on the current complicated and inconsistent inter-provider compensation schemes.
2) Any interconnection scheme should be cost-based to discourage the ability to arbitrage new technology or to increase the cost of market entry by new technology providers or users. The scheme should encourage the least-cost method of interconnection, should remove incentives for any entity to promote non-cost based methods of interconnection, and all parties should be encouraged to search for the best, most efficient, most economically and most technologically advantageous interface. Any method of interconnection should promote the smallest transaction cost. In a world where traffic flows equally to and from networks and where traffic-sensitive costs are approaching zero, providers do not really need to count minutes any more.
3) Interconnection principles should not favor one technology over another. That is to say, there should be no favoritism based upon application (*e.g.*, voice, chat, text, IM, email, video). In a digital world, all applications are or should be equal. To discriminate among applications would adversely skew the policy principles encouraging convergence.
4) Interconnection principles should not favor one affiliation or one type of provider over another in order to avoid and predatory cross-subsidy.
5) Interconnection should support modern public policy goals including
    a. promotion of network effects;
    b. creation of group forming networks;
    c. encouragement of user choice of technology, providers and applications;
    d. user control over their own communications experience to the fullest extent possible; and
    e. promotion of open network concepts that enable and welcome technological and social improvements regardless of source.
6) Interconnection should support historical public policy goals while subsidies move from application to network support.
    a. Internet-based communications, if allowed to evolve and serve users without subjugation to legacy access charge rules, could dramatically ease the burden on the Universal Service Fund (VoIP could be a near free alternative for traditional voice telephony if we allow it);
    b. current ILEC distribution of voice is economically 10 to 15 times more expensive to provide when compared to IP and Mobile voice;
    c. IP and Mobile voice have more benefits to those USF is supposed to help;
    d. allowing alternative providers of USF allows investment in new technology;
    e. now that costs to provide service are dramatically lower, prohibit over earning by any recipient of USF; and
    f. prohibit distribution of USF to any entity or affiliated entity that does not also explicitly support Modern Public Policy Goals (*e.g.*, if a telco blocks VoIP or other Internet traffic, that telco cannot receive a subsidy).