

REGULATORY REQUIREMENTS APPLICABLE TO VOIP SERVICES

NOVEMBER 3, 2010

Service Provider Requirements:	Traditional Telecommunications	Interconnected VoIP	Non-interconnected VoIP
Comply with state rules governing market entry/exit	✓	X	X
Comply with FCC rules governing market entry/exit	✓	✓	X
Comply with 911 and E911 requirements	✓	✓	?
Comply with FCC slamming rules	✓	X	X
Contribute to the Universal Service Fund (USF), Telecommunications Relay Service Fund (TRS) and related funds; pay FCC regulatory fees	✓	✓	X
Comply with Local Number Portability (LNP) rules (switches to/from service provider)	✓	✓	X
Comply with customer privacy/marketing restrictions (CPNI)	✓	✓	X
Comply with Communications Assistance for Law Enforcement Act (CALEA) requirements	✓	✓	X
Comply with FCC outage reporting requirements	✓	?	X
Subject to fines/enforcement action for first FCC violation	✓	X	X

KEY:

- ✓ Applies to the service provider.
- X Does not apply to the service provider.
- ? The FCC is considering whether to impose requirement.

DISCLAIMER: This chart is for informational purposes only and is not intended to serve as legal advice or a comprehensive review of regulatory obligations. If you would like more information on state and federal regulatory requirements for telecommunications, interconnected VoIP and non-interconnected VoIP providers or on any other telecommunications issues, please contact a member of Kelley Drye & Warren LLP's Telecommunications Practice Group.