



# TELECOMMUNICATIONS

## SNAP UP<sup>SM</sup>date

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### **FCC Alert:**

#### **Non-Interconnected VoIP Providers Must File 499-A & Contribute to TRS Fund**

On October 11, the [FCC](#) adopted rules requiring interconnected and non-interconnected VoIP providers to participate in and contribute to the [Telecommunications Relay Services \(TRS\) Fund](#), to register with the FCC, and to file an annual FCC Form 499-A

Interconnected VoIP providers have been required to contribute to the TRS Fund since 2007 via the required annual filing of a 499-A form. However, non-interconnected VoIP providers have not been required to contribute or file an FCC Form 499-A until now.

Under the [Communications and Video Accessibility Act \(CVAA\)](#), non-interconnected VoIP service “enables real-time voice communications that originate or terminate to the user’s location using internet protocol or any successor protocol, requires Internet protocol compatible customer premises equipment, and does not include any service that is an interconnected VoIP service,” such as “one-way” VoIP services and “IP-based voice services that do not require a broadband connection.”

Under the new Section 715 of the Communications Act non-interconnected VoIP service providers are now required to contribute to the TRS Fund and are now required to register with the Commission or report revenues through the annual filing of FCC Form 499-A.

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