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Idaho Public Utilities Commission
c/o Joe Cusick
P.O. Box 83720
Boise, ID 83720-0074

VIA EMAIL AND FIRST CLASS MAIL

Dear Mr. Cusick,

AT&T appreciates this opportunity to provide information as a follow-up to the meeting you convened with industry on July 12, 2016 regarding the regulation of Internet Protocol ("IP") or Voice over Internet Protocol ("VoIP") services.

AT&T strongly believes that Idaho's current practice of not regulating IP or VoIP should be codified into state law. Doing so will create a stable regulatory environment that encourages network investment and will benefit the citizens of Idaho. Although the Commission to date has not regulated IP/VoIP service, codifying this current practice in state statute will create economic certainty and incent companies to invest, innovate and grow without the threat of unnecessary regulations.

Thirty-four states plus Washington DC have adopted legislation to exempt IP and/or VoIP service from legacy telephone regulations and promote the development of these advanced services. This means that the majority of states have taken steps to prevent state regulation of VoIP communication. We encourage Idaho to do the same.

AT&T supports the Legislature's request to limit the review to the question of the regulation for VoIP and IP-Enabled services and not attempt to undertake a comprehensive review that would lead to a broad sweeping rewrite of Idaho's code. In the past two legislative sessions, it is these other issues that have prevented the legislation from passing. AT&T believes that the legislation proposed in 2015 is consistent with the Legislature's request as it addresses regulation of VoIP/IP without getting into a sweeping rewrite of Idaho's code. A copy of that legislation is attached to this letter.

As mentioned above, there have been several extraneous telecom issues that have been layered onto this narrow issue of VoIP/IP exemption. In AT&T's previous negotiations on this matter, we have addressed matters such as video franchise agreements, universal service fund issues, etc. all in attempts to appease various parties looking to either maintain the status quo or address fee structures related to VoIP.



While these issues are all important, this working group has not been charged by the legislature with addressing them, only addressing how this issue can impact these statutes. We again encourage this group to maintain a narrow focus on whether to codify in statute the current practice of exempting IP and VoIP services from state regulation.

We look forward to participating in the Commission's review of potential VoIP/IP exemption and recommendations and are available to answer any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tara Thue", is located below the "Sincerely," text.

Tara Thue
AT&T Regional Director for Idaho, Utah and Montana

Enclosures: 1