

For each paper you wish to comment on (Please repeat as many times as required) Name of the paper:

Australia's Comments on the WGIG VOIP paper

Has the issue as it applies to the question of Internet Governance been adequately identified?

Comments:

The list of issues is already thorough, however, the following points are also worth noting. We consider the first point particularly important.

- **The paper notes possible pressure to regulate VOIP in the same way as conventional PSTN services. A flow-on issue arising from such regulation is the difficulty in enforcing such regulation where the VOIP service is supplied from outside the country. For example, an offshore provider may refuse to meet consumer protection measures, creating enforcement difficulties for the national regulator. This could lead to different effective levels of regulation of VOIP services which may disadvantage national service providers vis-à-vis offshore providers.**
- **Concerns are sometimes expressed that VOIP services can cause difficulties for law enforcement agencies, for example, in terms of CLI veracity and interception capability. It is sometimes argued that there may be benefit in tackling such issues on a more coordinated global basis.**
- **Because VOIP services inherently have nomadic capabilities, concerns are sometimes expressed about VOIP compromising the operation of location-services like emergency call services and free call and premium rate services. There may be benefit in addressing these issues on a coordinated global basis.**
- **Some concerns have been expressed about the reliability of VOIP, particularly in providing a critical social and economic service into the future, and its ability to meet privacy requirements.**

Does the paper cover the topic with sufficient depth and accuracy?

Comments:

Generally yes, but see other comments in this response.

Does the paper achieve a reasonable balance in weighing relevant matters?

We find the paper a little negative, but this could reflect a relatively short-term perspective being taken.

If, as seems likely, VOIP services are widely taken up, without change to current arrangements they are likely to have implications for traditional PSTN revenue streams and cost recovery, both nationally and internationally. While not simple, these issues should, however, be able to be addressed over time, for example, by the development of new charging structures. In all instances charges, both wholesale and retail, should allow costs to be recovered.

VOIP also has a number of positives which could be noted:

- **VOIP allows relatively low cost entry into the telephony market, thus facilitating competition and improving consumer choice;**
- **VOIP may improve the business case for new broadband networks by allowing them to support voice services;**
- **VOIP can be readily integrated with other features and functionality, thus facilitating service innovation to the benefit of consumers;**
- **while noting upfront infrastructure issues, VOIP appears to support significantly lower calls costs, potentially helping the peoples of the world to communicate.**

Any other comments:

Comments:

As a general observation we consider VOIP should be viewed positively rather than negatively, with emphasise being placed on its the potential benefits. Nevertheless, VOIP does raise new policy and regulatory issues that will need to be addressed.

There may also be merit in examining more closely the implications of VOIP for the interaction between conventional Internet addressing and conventional telephone numbering.