



COMMUNICATIONS DIVISION – DECISION (D.) 24-11-003 ADOPTED NOVEMBER 7, 2024

MIGRATION OF INTERCONNECTED VOIP CARRIERS
Frequently Asked Questions**1. What is the interconnected VoIP migration and who is subject to the migration?**

The streamlined migration process was adopted to implement the new licensing and registration framework adopted in [D.24-11-003](#) for existing interconnected VoIP carriers that already have a Utility ID with the Commission.

Carriers subject to migration are:

- Interconnected VoIP carriers that obtained informal registration to comply with Public Utilities Code Section 285 surcharge reporting requirements (also known as Section 285 registration). The Section 285 registration was in place from November 2011 through April 2021. The carriers were issued a Utility ID number and designated the utility type “DVS”. The list of all carriers is in [Appendix D of D.24-11-003](#).
- Interconnected VoIP only carriers that were filed either a CPCN application or 1013 Registration and were granted an operating authority between August 2022 and October 2024. These carriers were issued a utility ID number and designated the utility type “IER”. The list of all carriers is in [Appendix E of D.24-11-003](#).

All carriers subject to the D.24-11-003 migration will be automatically converted after 45-days from issuance of the decision to have an operating authority as a non-facilities based fixed interconnected VoIP subject to the Commission's jurisdiction and will have a DVF utility type.

2. When does the migration schedule start and end?

Pursuant to [D.24-11-003](#) the migration schedule starts from the date the final decision was issued and made available to the public. Although the Commission adopted [D.24-11-003](#) on November 7, 2024, it was issued on November 12, 2024. The migration is complete for a carrier when its utility type status has been updated either to either DVF or DVN, or the carrier has been deactivated because it met all the requirements to surrender its utility ID number and cease operations.

3. How do I opt-out of the automatic migration?

There is a 45-day opt-out period for carriers that do not want to be automatically migrated to a non-facilities-based Fixed Interconnected VoIP carrier. Carriers opting out have two options and must take action between November 13, 2024 and December 27, 2024.

- **Option 1:** Nomadic-only interconnected VoIP carriers:

Within 45 calendar days from the issuance date of [D.24-11-003](#), Interconnected VoIP carriers that are Nomadic only must opt out by attesting in writing to the Commission that it qualifies for nomadic-only status. A sample attestation is included in Appendix A of [D.24-11-003](#). The attestation must include the provider's legal name as registered with the Commission and its assigned Utility ID Number and be signed under penalty of perjury by an officer of the company. This information must be submitted to the Director of the Communications Division via email to CDCompliance@cpuc.ca.gov.



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Please note that for nomadic only interconnected carriers previously granted an operating authority between August 2022 and November 2024, [D.24-11-003](#) effectively revokes the previously granted operating authority.

- **Option 2: Interconnected VoIP is Ceasing Operations in California:**

Within 45 calendar days from the issuance date of [D.24-11-003](#), Interconnected VoIP carriers who wish to cease operations and no longer provide services to customers must submit a request to the Director of the Communications Division via email to CDcompliance@cpuc.ca.gov.

The request should include:

- Utility ID Number and Utility Name;
- Requested effective date of deactivation and attestation that it has no active customers, no pending complaints, and no outstanding monies (e.g. surcharges, interest, and penalties) owed to the Commission; and
- A copy of the Telecommunications and User Fee Filing System reporting through the month prior to filing the request should also be included to ensure that the provider is current and up to date with its public purpose programs surcharges obligations.

Utility ID Numbers may not be surrendered if the provider has not remitted all surcharges and any late fees or other outstanding amounts owed. Upon approval, the carrier's Utility ID Number will be deactivated from the Commission systems.

4. I have a registration under the former Section 285 registration process. Do I need to register again or take any other action?

Carriers do not need to register again. No further action is required unless opting out of automatic migration due to being a purely nomadic VoIP provider or choosing to cease operations in California.

5. Will my Utility ID number or Utility Type designation change?

The Utility ID will remain the same. Only the utility type will be updated to either DVF or DVN.

6. How do I know if I have been migrated?

You may check the carrier's information here: [Utility Contact System Search](#) to determine whether the carrier has been migrated. The carrier is migrated when the utility type identified is either DVF or DVN.

7. After I have been migrated, do I need to do anything else?

Carriers should continue to comply with their existing surcharge reporting requirements and should take note of the new reporting requirements. Review the new reporting requirements for all interconnected VoIP at: [Carrier Reporting Requirements](#)

8. Who do I contact if I have additional questions?

For additional questions regarding the automatic migration, please email cdcompliance@cpuc.ca.gov. For general questions regarding [D.24-11-003](#) not related to the



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automatic migration refer to the separate FAQ document posted here:

<https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/information-for-telecommunications-applicants-and-registrants-in-california>