

**From:** [Hintz, Dan](#)  
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**Subject:** FW: Utah PSC  
**Date:** Thursday, September 24, 2020 3:07:28 PM  
**Attachments:** [FTR DR 2.6 - E Fiber Network Services over Fiber to other customer\[1\]\[2\].pdf](#)  
[NRG 8.11 VoIP- revision 0219 final 022519\[4\].pdf](#)

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Good afternoon Brock,

I agree that your network diagram is materially the same as scenario #1 in the Necal NRG 8.11. Many companies are provisioning voice telephony calls across their own fiber networks as VOIP however at both ends it is still handed off as a traditional POTS service. As described in the NECA NRG this complies with NECA's understanding of the FCC guidelines for regulated voice services, NECA would not consider this a non-regulated VOIP service.

Thank you,  
Dan Hintz  
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