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October 8, 2020

Mr. Brock Johansen  
Emery Telcom  
445 E. SR 29  
Orangeville, UT 84537

Subject: Providing Local Exchange Telephone Service Using VoIP Technology

Dear Brock,

In response to your inquiry regarding the use of Internet Protocol (IP) technology in provisioning voice service over fiber within a carrier's network, NECA has reviewed its reporting guideline on this matter: NECA NRG 8.11 - Providing Local Exchange Telephone Service Using Voice over Internet Protocol (VoIP) Technology. It continues to reflect NECA's understanding of when IP technology can be used to provide a regulated interstate telecommunications service.<sup>1</sup>

Sincerely,

A handwritten signature in blue ink that reads "Melody A Crane". The signature is written in a cursive, flowing style.

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<sup>1</sup> The Federal Communications Commission has authorized NECA to interpret its rules when necessary. However, the Commission retains the authority to review NECA's interpretations and their findings, if contrary to NECA's position, will take precedence. *See Safeguards to Improve the Interstate Access Tariff and Revenue Distribution Processes*, CC Docket No. 93-6, Report and Order to Show Cause, 10 FCC Rcd 6243 (1995).