

How to Allocate VoIP Subscriptions

The first thing to notice here is that we've redefined the major categories of VoIP subscriptions. Form 477 previously cut subscriptions into two groups:

1. Subscriptions purchased from you without also purchasing Internet access service from you. This category included:
 - a. subscriptions sold by “stand-alone” providers (*for example*, Vonage) that didn't also supply the connection that delivered the VoIP service, as well as
 - b. video + VoIP service subscriptions sold by cable TV system operators and other entities that own last-mile facilities to end-user premises.
2. Subscriptions purchased from you in conjunction with the purchase of Internet access service (*for example*, Internet + VoIP service packages and Video + Internet + VoIP service packages).

Now the split is slightly different:

1. Service to end users provided without also supplying last-mile facilities. We're calling these, **Over-the-top Subscriptions**. This includes subscriptions sold by providers (again, *for example*, Vonage) that do not also supply (that is, do not sell to the end user) the connection that delivers the VoIP service.
2. Service to end users provided over last-mile facilities supplied by the provider. These are simply **All Other Subscriptions** and represent everything that's not captured in **Over-the-top Subscriptions**, including:
 - a. subscriptions sold by providers that *do* supply the connection that delivers the VoIP service but don't also sell Internet access service to that end user; and
 - b. subscriptions sold to end users that *also* purchase Internet access service such that the reporting provider (including affiliates) sells both services to the end user.

		Then	
		Subscriptions purchased from you without also purchasing Internet access service from you	Subscriptions purchased from you in conjunction with the purchase of Internet access service
Now	Over-the-top Subscriptions	Subscriptions sold by providers that don't also supply / sell to the end user the connection that delivers the VoIP service	
	All Other Subscriptions	Subscriptions sold by providers that do supply the connection that delivers the VoIP service to the end user but don't also sell Internet access service to the end user	Subscriptions sold to end users that also purchase Internet access service such that the reporting provider sells both services to the end user

Another way to think of this is that interconnected VoIP service requires a high-capacity, or broadband, connection from the end user's location. That high-capacity connection may, or may not, also be delivering Internet access service to the end user. In this section of the form, count a subscription as an **Over-the-top Subscription** if you (including affiliates) **do not** supply (that is, do not sell to the end user) the high-capacity connection that terminates at the end user's location and carries the interconnected VoIP service. If a subscription is **not** an **Over-the-top Subscription**, count it among **All Other Subscriptions**.

New! All cells on the Interconnected VoIP Subscription page require whole numbers. We are no longer requiring subscriptions to be allocated in percentages.

Grand Totals, by End-user Type

The interface has done all the work here by tabulating the tract-level data you've already submitted, and entering the state-level values in the appropriate cells. Nothing to do here, but note that everything needs to add up when you're done.

Grand Total, Total must equal **Over-the-top, Total** + **All Other, Total**

Grand Total, Consumer must equal **Over-the-top, Consumer** + **All Other, Consumer**

Over-the-top Subscriptions

For this part, enter the **Total** number of subscriptions provided to end users without also supplying last-mile facilities, and the number of such subscriptions provided in **Consumer** or residential service plans. The interface will calculate the number of **Business/Government** subscriptions as a residual.

If all of your subscriptions fall into this category, then you're nearly done. Because the interface will check the math when you save your work, be sure to enter a zero in the unpopulated cells of the **All Other Subscriptions** section. **Remember that unless a cell already contains a number, you need to insert one.**

All Other Subscriptions

Distribute **All Other Subscriptions** in the following ways:

- **by End-user Type:** Enter the **Total** number of subscriptions provided to end users over last-mile facilities you supply, and the number of such subscriptions provided in **Consumer** or residential service plans. The interface will calculate the number of **Business/Government** subscriptions as a residual.
- **by Services Sold:** For **Voice with Internet**, enter the number of subscriptions where you (including affiliates) sell voice and broadband Internet access service to the same end-user customer. It does not matter if the two services are billed separately or if they are billed by different affiliates. The filing interface will then calculate the number of subscriptions for **Voice without Internet**—that is, without the end user **also** purchasing broadband Internet access service—as a residual.

- **by Last-mile Medium:** As mentioned above, All Other Subscriptions are subscriptions for which you (including affiliates) also supply / sell the end user with the high-capacity connection that delivers the interconnected VoIP service. That high-capacity connection could be last-mile facilities you own or it could be last-mile facilities you lease from an unaffiliated entity. In either case, count these subscriptions according to the technology of the high-capacity connection that terminates at the end user's location.

Total must equal FTTP + Coaxial Cable + Fixed Wireless & Satellite + Copper

Note on Technology/Last-Mile Medium for Interconnected VoIP Subscriptions:
Fiber-to-the-Premises (FTTP) requires an optical termination at the end-user premises; Coaxial Cable is the typical infrastructure used by cable television system operators, and it includes hybrid fiber-coax distribution plant; and Fixed Wireless, in this context, includes any type of wireless spectrum equipped to deliver fixed voice service to the end user's premises.