

REPUBLIC OF POLAND  
MINISTRY OF POSTS AND TELECOMMUNICATIONS

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Subject: Third World Telecommunication Policy Forum

With reference to the letter DM1177 of 2 November 2000 I sent you herewith our comments on the draft report of the Secretary – General on IP telephony for the WTPF -01. This letter will be sent also by E-mail.

The ITU document describes many important issues, but we would like to focus only on definitions of the different IP telephony services.

For the effective and market oriented regulatory regime it is essential to give proper definitions for different types of IP telephony services.

We agree with the ITU definition of IP telephony that is proposed in the document, according to which IP telephony is a generic term for the many different ways of transmitting voice, fax and related services over packet-switched IP-based networks. In other words the term describes all telephony services offered via the Internet.

However we would like to propose some changes in subdividing definitions. The ITU document proposes to treat Internet Telephony as the one using public Internet; VOIP in contrast is treated as the one that utilises managed private IP-based networks.

We agree that it is essential to distinguish between private and public IP-based networks. However in our opinion the above proposal is not exactly in line with our understanding of the terms set out in the previous paragraph. Therefore we propose subdividing IP Telephony into the following groups:

Intranet Telephony  
Internet telephony that utilises private IP- based networks for internal purposes of one entity.  
Internet Telephony  
Telephone Services offered via the Internet for commercial purposes.

The services offered are in effect similar to those accessible in fixed and mobile telephony.

Voice over IP (VOIP)  
Voice transmission over Internet.

According to the above described definitions IP Telephony has a general meaning, covering all telephony services offered both for commercial and non commercial purposes that use both private and public networks. We propose subdividing IP Telephony into two main groups: Intranet telephony and Internet Telephony. The former would use private networks for internal communication within one entity while the latter describes all telephony services used for commercial purposes. We consider it essential to define VOIP separately. It is a part of IP Telephony, but offers services limited only to voice transmission over IP. A separate definition for VOIP is very important for regulatory purposes.

We believe that this way of defining IP Telephony will make the regulatory process easier and will lead to greater transparency within the market.

Yours faithfully

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