Cooley

California Continues to Expand the Regulation of iVoIP

October 1, 2025

The California Public Utilities Commission (CPUC) continues to buck the historical light-touch state regulation of voice over internet protocol (VoIP) – think registration and fee requirements – and impose telephone-like regulations on fixed interconnected voice over internet protocol (iVoIP) service providers. Fixed iVoIP services provide two-way voice communications using internet protocol over a broadband connection at a fixed physical address that can receive calls from, and terminate to, 10-digit telephone numbers.

Late last year, the CPUC determined that fixed iVoIP providers were telephone companies and therefore must obtain prior CPUC approval to provide services in California. Recently, the CPUC went further and expanded its regulation of fixed iVoIP providers that serve residential and small business customers to impose service standards and reporting requirements; adopt fines for missing service standards; and require corrective action plans for missing outage standards. As of September 26, 2025, fixed iVoIP providers must comply with the service standards and reporting requirements, but enforcement, including penalties/fines, will begin January 1, 2027.

The Cooley communications group is following these developments and ready to assist iVoIP providers in complying with these CPUC requirements.

This content is provided for general informational purposes only, and your access or use of the content does not create an attorney-client relationship between you or your organization and Cooley LLP, Cooley (UK) LLP, or any other affiliated practice or entity (collectively referred to as "Cooley"). By accessing this content, you agree that the information provided does not constitute legal or other professional advice. This content is not a substitute for obtaining legal advice from a qualified attorney licensed in your jurisdiction, and you should not act or refrain from acting based on this content. This content may be changed without notice. It is not guaranteed to be complete, correct or up to date, and it may not reflect the most current legal developments. Prior results do not guarantee a similar outcome. Do not send any confidential information to Cooley, as we do not have any duty to keep any information you provide to us confidential. When advising companies, our attorney-client relationship is with the company, not with any individual. This content may have been generated with the assistance of artificial intelligence (AI) in accordance with our AI Principles, may be considered Attorney Advertising and is subject to our legal notices.

Key Contacts

Ronald W. Del Sesto Washington, DC

rdelsesto@cooley.com +1 202 728 7128

Tamar E. Finn	tfinn@cooley.com
Washington, DC	+1 202 728 7129
Brett P. Ferenchak	bferenchak@cooley.com
Washington, DC	+1 202 776 2138

This information is a general description of the law; it is not intended to provide specific legal advice nor is it intended to create an attorney-client relationship with Cooley LLP. Before taking any action on this information you should seek professional counsel.

Copyright © 2023 Cooley LLP, 3175 Hanover Street, Palo Alto, CA 94304; Cooley (UK) LLP, 22 Bishopsgate, London, UK EC2N 4BQ. Permission is granted to make and redistribute, without charge, copies of this entire document provided that such copies are complete and unaltered and identify Cooley LLP as the author. All other rights reserved.