

AvaTax for Communications VoIP Mapping Guidelines

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Document Revision History

The Revision History log lists the date and description of the most recent revisions or versions of the document.

Date	Version	Description	
03/25/2016	0005	Avalara branding updates to reflect the transition to the new company	
		and product names have been incorporated into this document.	
		Please see Appendix A – Avalara Product Names for specific changes in	
		product references and descriptions.	
06/21/2016	0006	Revised Mapping to include enhanced guidance and to include	
		coverage for non-interconnected VoIP. Expanded information in 911	
		and Other Per Line Taxes.	
02/24/2017	0007	Updated Section 1.2 Mapping Information: Transaction Types with	
		details to compare VoIP and VoIPA.	
09/25/2017	0008	Added Section 1.5 regarding Per-Invoice Taxes. Added Service Type	
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10/25/2017	0009	Updated Avalara contact information (address and support site).	
		Removed Appendix A – Avalara Product Names .	
02/23/2018	0010	Updated Section 3 Populating Data to include all Transaction Service	
		pairs.	
03/27/2018	0011	Removed Section 2.1 Voice Mail. Voice mail is addressed in section 1.3	
		under (577) Enhanced Feature Charge.	
07/25/2018	0012	Added Section 3. Mapping for Actual Interstate and Intrastate Usage	
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1. Voice over Internet Protocol (VoIP) Taxation

Taxation of VoIP services requires special handling and as such, special VoIP mappings are provided as a part of the AvaTax for Communications (AFC) mapping guidelines. This document will inform AFC software clients how to map VoIP transactions. This document will also explain the data necessary to populate each Transaction/Service Pair.

1.1 Safe Harbor

There are three accepted methods for collecting/reporting interstate and intrastate VoIP revenue for regulatory purposes. The first two are compatible (but not exclusive) to bundled selling; the third is not compatible with bundled selling:

- 1) Safe Harbor ratio: the FCC's preset ratio (64.9/35.1) gets applied to all voice-related charges. This could be applied to either a bundle of voice charges or separate usage fees. Non-voice related charges in a bundle (enhanced features, Internet, software, etc) should be unbundled for the purposes of applying FUSF. This is the default method found in the AFC Tax Engine;
- 2) Traffic Study: similar to 1) except the ratio is defined by quarterly traffic studies performed on the network and documented with the FCC/USAC. All other items are the same as 1). This can be accomplished in the AFC Tax Engine via an override file or API;
- 3) Actual CDR billing: When billing customers for call detail activity, a carrier must be able to attest that the caller's originating location can be confirmed, you can report on the basis of actual interstate and international call charges. Your itemized interstate/International LD charges get full FUSF applied. The rest of the bill does not. Since this method is based on actual call detail usage, it is not compatible with typical bundles. This method would involve the use of an override file within the AFC Tax Engine. See section 3 for more detail.

1.2 Mapping Information: Transaction Types

AvaTax for Communications supports taxation for three different types of VoIP service, all with unique transaction types: Non-Nomadic or Fixed Location VoIP; Nomadic VoIP; and Non-Interconnected VoIP. As a starting point, users will need to determine which transaction type(s) is appropriate for the category of VoIP services they are offering.

Non-Nomadic or Fixed Location VoIP service is typically tied to a particular physical and/or IP location and may only make a VoIP connection from the location recognized by the subscriber's Internet Service Provider (ISP) as the subscriber's service location. These services should use Transaction Type 19 or 20 (VoIP or VoIPA). VoIP and VoIPA (VoIP Alternative) were set up to accommodate the differences in VoIP taxation theories as various jurisdictions formulate their VoIP policies. Where a jurisdiction clearly declares its intent to tax VoIP services, AFC applies tax to the

corresponding service types in both VoIP and VoIPA. If a jurisdiction clearly does not tax a particular VoIP service, AFC will not return tax in either VoIP or VoIPA transactions. If it is unclear that a jurisdiction intends to tax a VoIP service, AFC applies tax to the VoIP services, and does not apply tax to the VoIPA service.

<u>Nomadic VoIP</u> service typically utilizes a phone adapter or software application that may be moved from location to location to connect the calling phone to the internet from any location in the world where a broadband internet connection is available. In reverse, this would also allow any caller to automatically locate and reach a nomadic VoIP subscriber anywhere in the world by calling the VoIP user's phone number, as long as the user's VoIP adapter or software-enabled device is connected to a broadband internet connection. This service should use **Transaction Type 59 (VoIP-Nomadic)**.

<u>Non-Interconnected VoIP</u> is sometimes referred to as "peer-to-peer" VoIP and often limits users to calls with other users of the same service/protocol and does not offer the ability to make and receive calls from the Public Switched Telephone Network (PSTN). This service should use **Transaction Type 65 (Non-Interconnected VoIP)**.

1.3 Mapping Information: Service Types

The following table represents service types that are used for VoIP (19), VoIPA (20) and VoIP-Nomadic (59) transaction types. Those that are valid with Non-Interconnected (65) as well are marked with an asterisk (*).

Service Type	Description
(6) Access Charge*	Basic monthly flat rate for VoIP service.
(8) Install	Charge for installation of VoIP services.
(11) Activation*	One-time charges for activating a VoIP account. (Mutually exclusive of the other VoIP charges.)
(13) Equipment Repair	Charge for repair of equipment necessary to make VoIP calls.
(14) Late Charge*	Late charge on VoIP services.
(30) Local Feature Charge*	Charges and fees for additional feature charges of VoIP services. (Includes services such as call waiting, caller ID, call blocking, call forwarding, etc.)
(37) Equipment Rental	Charge for renting equipment necessary to make VoIP phone calls.

Service Type	Description
(48) Wireless Access Charge	This will tax similar to Cellular/Access Charge. Federal and State USF are applied, but at the wireless safe harbor rate (valid only with Transaction types 19 and 20).
(49) Interstate Usage*	Portion of MRC, or per-minute charges, attributable to calls that cross state lines but do not leave the United States. (Reserved for use when sending actual interstate and intrastate usage using the Actual CDR billing method).
(50) Intrastate Usage*	Portion of MRC, or per-minute charges, attributable to calls that do not cross state lines. (Reserved for use when sending actual interstate and intrastate usage using the Actual CDR billing method).
(51) International Usage*	Portion of MRC, or per-minute charges, attributable to calls that originate inside the United States and terminate outside the United States.
(53) LNP	Fixed, monthly charge associated with transferring an existing phone number to a VoIP service provider.
(577) Enhanced Feature Charge*	Charges and fees for additional feature charges of VoIP services which are separate from basic transmission services. (Includes services such as voicemail, interactive voice response, audio text information services, and protocol processing.)
(596) Access-Local Only Service	Basic monthly flat rate charge for Local Only Service VoIP.
(635) Toll-Free Number	Monthly recurring charge for access to a VoIP toll free number.

1.4 E911 and other Per-Line Taxes

Many jurisdictions have different rates or reporting requirements for landline, wireless and VoIP services. For this reason, there will be jurisdictions where the VoIP tax type applies and other jurisdictions where an unspecified E911 applies. Non-Interconnected VoIP services are not typically subject to 911 compliance as these types of services do not ordinarily provide 911 functionality. Thus Non-Interconnected VoIP services are not submitted with line count transactions. For fixed location and nomadic services, in order to ensure that appropriate per line taxes are returned, users must submit at least one line count transaction with line quantity data. For single channel lines, Lines (service type 21) is appropriate. Additionally, using Wireless Lines (service type 52) will produce the wireless rate when it differs from the standard rate.

For customers using trunks (PBX or PBX High Capacity), three transactions must be passed to provide the proper per line taxes. This is because some jurisdictions assess per line taxes, such as E911, on the number of Trunks used, while others assess on the number of Outbound Channels and still others assess based on the number of Extensions. In some cases, tax could be assessed on more than one transaction. For example, the jurisdiction may assess TRS on the trunk and E911 on the Outbound Channels.

For **PBX Trunks**, the transactions are as shown below:

- 578-PBX Designates the number of PBX Trunks a customer is using. The Lines field of this transaction should be populated with the number of Trunks to be taxed.
- 566-PBX Outbound Channel Designates the number of outbound channels a customer is using on a PBX Trunk. The Lines field of this transaction should be populated with the number of Outbound Channels to be taxed.
- 41-PBX Extension Designates the number of Extensions a customer is using on a PBX Trunk. The Lines field of this transaction should be populated with the number of Extensions to be taxed.

For **High Capacity Trunks**, the transactions are as shown below:

- 579-PBX High Capacity Designates the number of High Capacity Trunks a customer is using. High Capacity Trunks are usually defined as T1 or greater. The Lines field of this transaction should be populated with the number of Trunks to be taxed.
- **582-High Capacity Outbound Channel** Designates the number of outbound channels a customer is using on a High Capacity Trunk. **The Lines field of this transaction should be populated with the number of Outbound Channels to be taxed.**
- **580-High Capacity Extension** Designates the number of High Capacity Extensions a customer is using on a High Capacity Trunk. **The Lines field of this transaction should be populated with the number of Extensions to be taxed.**

The following table represents service types that are used for VoIP (19), VoIPA (20) and VoIP-Nomadic (59) transaction types.

Service Type	Description
(21) Lines	Designates the quantity of numbers a VoIP customer is using. (Taxable amount is irrelevant for this transaction/service type. Tax is calculated based on the number of lines designated in the lines field.) This service type will return E911 at the landline rate regardless of whether it is paired with the VoIP or VoIPA transaction type.
(578) PBX	Designates the number of PBX trunks a VoIP customer is using. (Taxable amount is irrelevant for this transaction/service type. Tax is calculated based on the number of trunks designated in the lines field. Used in conjunction with 19/41 and 19/566.)
(566) PBX Outbound Channel	Designates the number of voice grade communications channels leaving a subscriber's premises through a VoIP PBX connecting the subscriber's premises to the public switched network. (Taxable amount is irrelevant for this transaction/service type. Tax is calculated based on the number of extensions designated in the lines field. Used in conjunction with 19/41.)

Service Type	Description
(41) PBX Extension	Designates the number of VoIP PBX extensions a VoIP service customer is using. (Taxable amount is irrelevant for this transaction/service type. Tax is calculated based on the number of extensions designated in the lines field. Used in conjunction with 19/566 and 19/578.)
(579) PBX High Capacity	Designates the number of High Capacity Trunks a customer is using. (Taxable amount is irrelevant for this transaction/service type. Tax is calculated based on the number of High Capacity Trunks designated in the lines field.)
(582) High Capacity Outbound Channel	Designates the number of voice grade communications channels leaving a subscriber's premises through a VoIP High Capacity Trunk connecting the subscriber's premises to the public switched network.
(580) High Capacity Extension	Designates the number of VoIP extensions a VoIP service customer is using on a High Capacity Trunk. (Taxable amount is irrelevant for this transaction/service type. Tax is calculated based on the number of extensions designated in the lines field.)
(52) Wireless Lines	Designates the quantity of numbers a VoIP customer is using. (Taxable amount and number of lines are irrelevant for this service type. Tax is calculated based on the number of transactions passed. For two lines you would pass two transactions.) (valid only with Transaction types 19 and 20).

1.5 Per-Invoice Taxes

In order to ensure that appropriate per invoice taxes are returned, users must submit one invoice transaction using service type **43-Invoice**. Tax is based per invoice per account per billing cycle. Pass one transaction for each invoice issued. The charge and lines fields are irrelevant and must be set to zero.

The following table represents service types that are used for VoIP (19), VoIPA (20), VoIP-Nomadic (59), and Non-Interconnected (65) transaction types.

Service Type	Description
(43) Invoice*	Mapping category for transactions on a per invoice basis. (Tax is based per invoice per account per billing cycle. Taxable amount or numbers of lines are irrelevant for this transaction/service type.)

2. Additional Services

While the above transactions can support most of the VoIP service offerings and features, there are some additional services that will be handled outside of the VoIP transaction.

2.1 Directory Assistance

Clients who offer directory assistance should use the following Directory Assistance transactions.

Transaction Type	Service Type	Name	Description
1	54	Interstate/Directory Assistance	Charges for Directory Assistance calls that cross state boundaries.
2	54	Intrastate/Directory Assistance	Charges for Directory Assistance calls that are contained wholly in one state.

3. Mapping for Actual Interstate and Intrastate Usage

AFC users choosing to send actual interstate and intrastate usage data rather than using the AFC default Safe Harbor method for VoIP Transaction/Service pairs can use the following Tax Types for override functionality. The existing Tax Type would need to be set to zero and the VoIP Alternate Tax Type would need to be assigned the current tax rate.

When billing customers for call detail activity, a carrier must be able to attest that the caller's originating and terminating locations can be confirmed. Itemized interstate, international, and local number portability (LNP) charges will receive full FUSF application. The rest of the bill will receive full state USF charges where applicable. Since this method is based on actual call detail usage, it is not compatible with typical bundles. This method involves the use of an override file within the AFC Tax Engine.

Note: This is only applicable for use with VoIP Transaction Types 19 (VoIP), 20 (VoIPA), and 59 VoIP-Nomadic).

State	Existing Tax Type	Existing Tax Type Name	Alternate Tax Type	Alternate Tax Type Name
				FCC Regulatory fee (VoIP
Federal	226	FCC Regulatory Fee (VoIP)	274	Alternate)
Federal	162	FUSF (VoIP)	163	FUSF
		Universal Service Fund		
Alaska	165	(VoIP)	282	State USF (VoIP Alternate)

Chaha	Existing Tax	Frieding Toy Type Name	Alternate	Altamata Tay Tura Nama
State Arizona	Type 13	State Universal Service Fund	Tax Type 282	Alternate Tax Type Name State USF (VoIP Alternate)
ATIZOTIA	15	State Offiversal Service Fund	202	E-rate Broadband Program
Arizona	478	E-rate Broadband Program	519	(VoIP Alternate)
Arkansas	13	State Universal Service Fund	282	State USF (VoIP Alternate)
California	161	E911 (VoIP)	239	E-911 (VoIP) Alternate
California	217	TRS (VoIP)	291	Telecommunications Relay Svc Charge (VoIP Actual)
California	450	CA High Cost Fund A (VoIP)	288	CA High Cost Fund A (VoIP Actual)
California	452	CA Teleconnect Fund (VoIP)	292	CA Teleconnect Fund (VoIP Actual)
California	453	CASF (VoIP)	293	CASF (VoIP Actual)
California	454	Universal Lifeline Telephone Service Charge (VoIP)	290	Universal Lifeline Telephone Svc Chg (VoIP Actual)
Colorado	165	Universal Service Fund (VoIP)	282	State USF (VoIP Alternate)
Kansas	165	Universal Service Fund (VoIP)	282	State USF (VoIP Alternate)
Maine	13	State Universal Service Fund	282	State USF (VoIP Alternate)
Maine	215	ConnectME Fund (VoIP)	520	ConnectME Fund (VoIP Alternate)
Missouri	522	P.U.C. Fee NF	521	P.U.C. Fee (VoIP Alternate)
Missouri	141	Missouri Universal Service Fund	282	State USF (VoIP Alternate) *
Nebraska	299	NE Universal Service	282	State USF (VoIP Alternate)
Nevada	165	Universal Service Fund (VoIP)	282	State USF (VoIP Alternate)
Oklahoma	165	Universal Service Fund (VoIP)	282	State USF (VoIP Alternate)
Puerto Rico	165	Universal Service Fund (VoIP)	282	State USF (VoIP Alternate)
Washington D.C.	165	Universal Service Fund (VoIP)	282	State USF (VoIP Alternate)
Wisconsin	271	WIUSF	282	State USF (VoIP Alternate)
Wyoming	522	P.U.C. Fee NF	521	P.U.C. Fee (VoIP Alternate)
Wyoming	426	WY USF	282	State USF (VoIP Alternate)

^{*}Note: Missouri requires the naming for the State USF to conform to the following "Missouri Universal Service Fund". Modifications to the Tax Type name may be required in your billing system if using tax type 282 in Missouri.

4. Populating Data

The data required for accurate taxation varies from service type to service type, but each service type is the same regardless of whether you choose VoIP or VoIPA. Common variables that need to be set for each transaction are: Business/Residential, Sale/Resale, Regulated/Unregulated, and Incorporated/UnIncorporated.

The following chart lists which data to populate for each service type.

Service Type	Data
Access Charge	Taxable Amount
Access Charge-Local Only	Taxable Amount
Service	
Activation	Taxable Amount
Enhanced Features	Taxable Amount
Equipment Rental	Taxable Amount
Equipment Repair	Taxable Amount
Install	Taxable Amount
International Usage	Taxable Amount, Minutes
Interstate Usage	Taxable Amount, Minutes
Intrastate Usage	Taxable Amount, Minutes
Invoice	None (Taxable Amount, Lines, and Minutes should be populated with zeros.
	Taxes returned based upon how many transactions are passed into the system.
	You should pass one transaction for each invoice issued.)
Late Charge	Taxable Amount
Lines	Lines
LNP	Taxable Amount
Local Feature Charge	Taxable Amount
PBX, PBX Extension, and PBX	Lines
Outbound Channel	
PBX High Capacity, High	Lines
Capacity Extension, and High	
Capacity Outbound Channel	
Toll-Free Number	Taxable Amount
Wireless Access Charge	Taxable Amount
Wireless Lines	Lines