

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
) WC Docket No. 17-108
Notice of Proposed Rulemaking, captioned)
"Restoring Internet Freedom")
)

To: The Commission

April 27, 2017

REPLY COMMENTS OF STAIRCASE 3, INC, D/B/A REPEATERSTORE AND RSRF

Staircase 3, Inc., d/b/a RepeaterStore and RSRF ("Staircase 3"), hereby responds to the Wireless Competition Bureau's ("Bureau") Notice of Proposed Rulemaking ("NPRM") on "Restoring Internet Freedom."

The choice of title, "Restoring Internet Freedom," is at best a misnomer, and at worst a willful effort by the FCC to mislead the public about this Proposed Rulemaking. The "freedoms" that would be granted would be solely to broadband providers, and would include the freedom to violate the principles of Net Neutrality and the open Internet by enabling paid prioritization.

As a startup that relies upon an open and neutral Internet, Staircase 3 is dismayed by the FCC's new path. The FCC's claims in the NPRM that broadband investment has decreased as a result of the FCC's Title II Order of 2015. Once again, this is a willful effort by the FCC to mislead the public. Relying on information from a report by USTelecom, the broadband industry's lobbying arm, shows that the FCC is clearly not interested in using impartial sources, and has a predetermined opinion that it is looking to justify.

The reality is that under the proposed rules consumers and small businesses will lose while large Internet Service Providers like Comcast, AT&T, Charter and Verizon will win. By limiting the FCC's ability to penalize ISPs for favoring or discriminating against particular sources of Internet traffic, the proposed rules would harm users and innovators alike.

Enforcement of strict net neutrality is key to an open Internet. By limiting that enforcement, the FCC is putting the future of the open Internet at jeopardy. Staircase 3 strongly urges the bureau to end these rules, and maintain the existing Title II regime for enforcing net neutrality.

Respectfully submitted,

Sina Khanifar,

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