Before the
Federal Communications Commission

In the Matter of	)	
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Restoring Internet Freedom	)	**WC Docket No. 17-108**
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FarmLogs

July 12, 2017

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<u>**Executive Summary**</u>

FarmLogs creates easy-to-use technology that helps row crop farmers run more efficient and more predictable businesses. For example, FarmLogs provides field information, alerts, and scientific recommendations that helps farms prevent unnecessary yield loss and improve profitability. Founded in 2011, we now provide services to over one in three U.S. farms; that's over 75M acres on which farmers use FarmLogs to manage their operation. We have offices in Ann Arbor, Michigan and Des Moines, Iowa, and have over 70 employees.

We support a truly open Internet, and we rely on it for our business. The FCC's proposal would allow the creation of a two-tiered Internet, stifling our ability to compete with big companies. Allowing big cable and wireless companies to pick winners and losers in the market will not only harm our business, but the ability of any new entrants to enter the market to compete fairly with incumbents (including the cable and wireless companies themselves).

We urge the FCC to sustain the existing, strong net neutrality rules, based on Title II of the Communications Act. The FCC should maintain bright line rules against blocking, throttling, and paid prioritization on both fixed and mobile connections, as well as maintain ongoing oversight of other types of discrimination.

I. Who We Are and What We Do

My story and path to FarmLogs started as a kid, growing up on a farm managed by my family. Back then, we had a farm office in the breezeway of my uncle's house. I used to be fascinated with going there, because that office had something magical: a computer. It was the first computer I had ever seen. Before we got one at home several years later, I was able to witness this incredible technology playing an important role on the farm. We also had a satellite terminal that pulled up weather radar, market data, and news. To me as a young kid, the farm was where all the cool technology was.

By 2011, a lot had changed. I had followed my dreams and spent the past five years working on cutting-edge Internet technology after studying Computer Information Systems in college. I had

a chance to see how the Internet and advancements in computing was radically changing our world. It was exciting, but something was bothering me.

When I went home to the farm, the technology seemed dull. No. Worse. It was clumsy, difficult to use, expensive, and not innovative. I watched my brother go to a class to learn how to use the fancy new software my dad and uncle had just installed off a CD onto a desktop computer.

I was left with a burning thought that I just couldn't get out of my mind. The future of farming needed to be better, faster.

I started to dig in. Quickly, I learned that it wasn't just my family looking for better software programs to help them run their farm businesses. It was nearly every neighboring farmer that I knew. Everyone was frustrated with the status-quo, yet nothing was being done about it. Technology innovation had stalled out in an industry where it had once been a leader. The excitement of having live data feeds before the Internet, self driving tractors before the self-driving car, and a computer at the office before we had one at home had all but died. The only companies building farming software were, well, farming companies. What did equipment manufacturers or hardware companies know about software? Well they knew one thing for sure: how to make it difficult to use.

When I talked about this problem with my technology friends it became clear to me that they had no idea what the modern farm was made of. They all assumed either one of two things: one, that farming was just done by big corporations like ADM and Monsanto, or two, that farmers were old-school, simple people that didn't want technology to help them. I was amazed.

This misunderstanding in Silicon Valley had left a big, gaping hole in a massively important space. The one that I happened to care about most. Farming. The industry that my dad, brother, uncle, and the entire community I grew up in was a part of. It was with that realization that I knew what I was going to pour all of my energy into going forward. I was one of the few that understood what was state of the art in technology and how none of it was reaching farming, and I had to use my skills to create a better future for the people I cared about.

In November of 2011, FarmLogs was born. We were two people on a mission to create a better future for farming and we were going to do anything it took to make that happen.

I had recruited my co-founder Brad who was the best programmer I knew, and together we would go on to launch our software. We come from humble beginnings on the farm, but our ambitions are large.

Today, FarmLogs is the leading data science company focused on helping farmers use technology to create a better future for their farms. Our tools are now used by over 1 in 3 farms in the country. We have has grown the company to over $25 billion in crops under management, we have raised $37 million in capital from leading technology investors. We're happy to be part of a growing agriculture and technology ("AgTech") industry.

And as an independent company, we care about one thing: helping farms make every acre as profitable as it can be regardless of what other providers they're working with. We don't sell seed, fertilizer, chemicals, or farm machinery. We build software. Simple as that. Our independence keeps our recommendations unbiased, and our economic incentives aligned with our customers. Our independence helps farms be independent, too.

All of this depended on the open Internet. Without it, we would not be able to compete with larger more established incumbents.

II. The FCC Should Sustain Its Existing Strong Net Neutrality Rules and The Existing Legal Framework Under Title II

As I mentioned above, one of the initial questions about our business was the assumption that only big companies were successful in farming, and there'd be no place for a start-up like us.

Without net neutrality, this truly might have been the case. Big cable and wireless companies could have cut deals with large farming companies and software developers to prioritize their services' Internet traffic over others. Companies like ours would have been left behind in the slow lane, and found it more difficult to sell our services to farms. In essence, cable and wireless

companies could have picked winners and created a pay-to-play system in this emerging farm technology environment. Start-ups like us would have lost out, and so would the farms that work with us. (And while it might be hard to imagine cable companies cutting deals in this space, cable companies have moved into markets like home security systems that once were far afield from their core businesses.)

The Commission's proposed approach under Title I would interfere with innovation, competition, and consumer choice online. Previous court rulings have said that an approach under Title I would preclude certain bright-line rules. Instead, the FCC is proposing a set of vague legal standards that would allow discrimination. Small companies like ours do not have the legal resources to address instances of discrimination, absent the existing bright line rules and authority for ongoing oversight. By the time the lengthy process of case-by-case review of anti-competitive behavior is complete, a startup like ours would simply not exist.

The FCC's existing framework works well. It should sustain its current approach under Title II; ban blocking, throttling, or paid prioritization of Internet traffic; and continue ongoing oversight of other discriminatory conduct.

Respectfully submitted,

/s/ Jesse Vollmar

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