**Before the**

**Federal Communications Commission**

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| **In the Matter of** | **)** |  |
|  | **)** |  |
| **Restoring Internet Freedom** | **)**  **)**  **)**  **)**  **)**  **)**  **)** | **WC Docket No. 17-108** |
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**Mapbox, Inc.**

July 12, 2017

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|  | Eric Gundersen  Chief Executive Officer  Mapbox  1509 16th St NW  Second Floor  Washington, DC 20036 |

**Executive Summary**

Mapbox is an open source mapping platform for developers. We're changing the way people move around cities and understand our planet. We’re a startup based in Washington, D.C. and San Francisco, CA and employ over 250 employees. Currently, we reach over 800,000 developers worldwide and have over 70,000 active developers using our tools daily. We’re also a deeply committed to doing good, and use our tools and resources to build smart cities, eliminate malaria, and aid in disaster response.

We support a truly open Internet, and we rely on it for our business. We would not be able to reach our users or help the communities we work with without an open internet. The FCC’s proposal would allow the creation of a two-tiered Internet, stifling our ability to compete with big, established incumbents. 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**Mapbox is a mapping platform for business: scalable components for mobile and web apps. Our tools make it easy for developers to harness the power of location. We want to change the way people move around cities and understand our planet. Mapbox’s growth can be attributed to an open internet. With big competitors like Apple and Google, we would never have been able to build an international business without the ability to compete on the quality of our tools alone. Now, we have grown from a few people in a garage creating maps for NGOs to a mapping platform that is being used by more than 70,000 developers each month and is in apps like Pinterest, Mapquest, the Financial Times, GitHub, the Weather Channel, and Lonely Planet, touching more than 250 million people worldwide.  
  
**II. The FCC Should Sustain Its Existing Strong Net Neutrality Rules and The Existing Legal Framework Under Title II**

As a location platform, we depend on an open Internet, and so do the developers that use our platform. Today, we and the developers on our platform can compete and reach a worldwide audience, and succeed based on the quality of the application or service. Many of the developers on our platform are individuals or small teams innovating on shoestring budgets, just as we were not long ago. Big companies may have bigger marketing budgets, but ultimately any consumer can choose to use our developer’s app or our service with the same broadband speeds they would get for any other service. The FCC’s proposal would be anti-competitive, allowing large companies to slow or even block our service from consumers. Those willing, and with the means, to pay would be able to reach consumers, but those that cannot afford the payoff--entrepreneurs and startups--would find a steep barrier.

The 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/ Eric Gundersen

Eric Gundersen

Chief Executive Officer

Mapbox, Inc.