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Submitted via FCC's Electronic Comment Filing System (ECFS)

Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: *Restoring Internet Freedom*, WC Docket No. 17-108

Dear Ms. Dortch,

On behalf of the more than 14,000 members of the National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, I submit these comments on the Notice of Proposed Rulemaking (NPRM) in the matter of Restoring Internet Freedom. The manufacturing sector has become increasingly dependent on connected technology and the NAM strongly supports the efforts of the Federal Communications Commission (FCC) to end overregulation of the internet.

Once a tool accessible only through our personal computers, the internet has seamlessly integrated into every aspect of our daily lives. The growth of wireless networks and broadband systems capable of transmitting tremendous amounts of data keep us constantly connected as do handheld devices whose capabilities seemed unimaginable just a decade ago.

Manufactured products and processes have also become internet-enabled. There is now a constant connectivity dramatically changing the way manufacturers compete and how they engage with customers. On the shop floor and in the field, the industry is using technical tools and infrastructure for managing production activities, safeguarding and monitoring plant security, enhancing product performance and reliability as well as satisfying customer needs, tracking inventory and raw materials and shipping logistics.

This nexus of exciting technologies has delivered the “Internet of Things” (IoT) – the interconnectivity of devices of all kinds that has resulted from secure network connectivity, wireless technology and cloud infrastructure. The number of connected devices is increasing exponentially. Billions of devices are already connected and billions more are coming online every year. This is creating transformative change and new opportunities in the manufacturing sector. The IoT is playing an integral role in driving innovation and new product and revenue streams in the industry which is increasing its global competitiveness and its ability to create jobs in the United States.

The growth of faster and more capable wireless and wired high speed broadband networks powering all this innovation was developed in a carefully balanced regulatory environment that was in place for more than twenty years. That regulatory approach to our nation's telecommunications infrastructure helped shop floors in the U.S. become some of the most highly sophisticated and connected environments in the world.

That smart regulatory framework encouraged waves of private sector investment that constantly improved and enhanced our nation's wireless and wired broadband infrastructure. That investment helped foster the technological and innovative leadership manufacturers in the United States enjoy today. There is now the potential for billions of dollars to be invested to deploy the next generation of broadband networks that are in development. This future infrastructure investment will support new innovations in wireless technology and address the challenges faced by manufacturers in rural areas. This will help maintain the U.S.'s global leadership position and drive future economic growth in the manufacturing sector.

The NAM strongly supports an open internet and is greatly concerned the internet regulatory regime put in place during the previous Administration will derail future investment in our nation's broadband infrastructure. The transformative change the internet has driven in manufacturing products and shop floors was made possible because of limited regulation that was market-based, pro-competition and encouraging of private investment. The FCC's 2015 decision to subject the 21st Century internet to 20th Century-era laws has slowed investment and discouraged innovation in future technologies.

The NAM urges the Commission to move forward on its efforts to restore internet freedom by reinstating that broadband internet access service should be classified as an information service and return to the pro-innovation regulatory regime that was so successful in helping to drive growth in the manufacturing sector over the last two decades.

While we strongly support the Commission's current efforts the NAM firmly believes it is necessary for Congress to act in this matter to make the internet permanently open. Manufacturers support an estimated 17.6 million jobs and contribute \$2.09 trillion to the national economy. The current uncertainty surrounding the openness of the internet needs to be clarified in law to maintain that long-term economic impact. The NAM is committed to working with Congress on a legislative solution that encourages investment in our nation's telecommunications infrastructure, which drives innovation in the manufacturing sector.

Comments Submitted by:

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