

July 17, 2017

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Chairman Pai:

Thank you for taking the time to solicit opinions on the Restoring Internet Freedom Notice of Proposed Rulemaking. The Hispanic Leadership Fund (HLF)—a national non-partisan advocacy organization that promotes public policy that strengthen liberty, opportunity, and prosperity—works at the federal and state levels to ensure the American Dream remains alive for all. In today's world, a cornerstone of that dream is access to affordable internet. The simple truth is, if you are not connected, you are left behind.

As such, HLF fully supports efforts to roll back the burdensome regulations imposed on internet access services during Chairman Wheeler's tenure at the Federal Communications Commission. Reclassifying the internet under Title II of the Communications Act as a public utility was the wrong approach and has already negatively impacted Hispanic consumers and stifled investment.

When the FCC last debated net neutrality rules three years ago, we [argued](#) that it would be a mistake to shackle the internet with outdated, onerous public utility rules. Policymakers who created the Title II framework for the wireline telephone system in the 1930s could never have foreseen the development of the modern internet, much less intended that their regulations be applied to such a dynamic, revolutionary technology

Internet access is a concern for many American communities. And Hispanics face some particular challenges. According to a recent [study](#), smartphones are the only source of home internet for nearly one-quarter of the Hispanic community, which outpaces other communities. Additionally, despite being early adopters of smartphones, Hispanics have lower rates of internet usage.

Without network expansion, these trends will continue to lag. Multiple reports point to billions of dollars of lost investment as a direct result of Title II reclassification. [One estimate](#) puts the lost revenue between \$20 and \$30 billion.

For Americans living in areas that are unserved or underserved by broadband services, this investment slowdown means even longer delays in gaining full participation in the digital

economy, in addition to the lost infrastructure, jobs, and small businesses that come with major investments in broadband infrastructure. Increased internet access alone provides ordinary Americans the opportunity to benefit from the transformative power of the digital era. This includes distance learning, job training, telehealth, civic engagement, and a myriad of other applications that can lead to better, healthier livelihoods.

We support an open internet, and believe there should be enforceable rules preventing any internet company from blocking, throttling, or unfairly discriminating against any lawful content online. A free and open internet is best served by a light-touch regulatory framework with clear, enforceable rules—not an overly broad, onerous, and outdated utility structure that stifles investment and innovation. The common-sense, modern approach had bipartisan backing and proved to be highly effective under both the Clinton and Bush administrations.

Given the evidence and negative consequences of unilaterally imposing Title II regulations, the Hispanic Leadership Fund urges you to reclassify the internet back under a Title I, information service.

Sincerely,



Mario H. Lopez

President