

Comments on Restoring Internet Freedom in favor of net neutrality via strong Title II enforcement

I am a US Citizen writing regarding internet neutrality and my residential ISP connection to the internet. I have cable-based internet service from Spectrum. I use my ISP to connect and interact with people and companies from across the US and world. I collaborate on work and community projects using Google Docs, Google Drive, Dropbox and other services. I participate in webinars and online forums as part of my professional society, and catch up with friends and neighbors on Facebook and Nextdoor. On the internet, I share and view photographs and video, ask and answer, make and consume content, assign and complete work, and send and receive data. For all of this I depend on a uniformly reliable connection to the internet.

My primary concern with reclassification of broadband and removal of current FCC net neutrality enforcement is loss or reduction of services due to ISP negotiations with third parties. For example, my small professional society offers webinars that I rely on for continuing professional education. My ISP, the largest in the country, may favor negotiations with larger for-profit providers who provide educational materials to a broad swath of professionals. The market power of large, for-profit educational provider may enable them to negotiate the best, fastest access. My professional society might only be able to provide limited quality or quantity service or could even be blocked as a result of exclusivity agreements. Given the small size of me and my professional society, and my lack of choices in broadband service, large, nation-wide ISPs like Spectrum are unlikely to be concerned about maintaining my access to high quality educational resources.

I am also concerned about my ISP's treatment of VOIP and streaming video providers specifically. My ISP offers phone, TV and streaming services that directly compete with my current VOIP (google voice) and streaming video (netflix). Prior to Title II regulations, ISPs had already started to use their position between customers and internet services to limit or disadvantage competing streaming providers through the use of delayed interconnection upgrades, throttling, and data caps. My concern is that the FTC won't have the technical resources or depth to prevent anti-competitive behavior, and that any FTC enforcement actions related to anti-competitive behavior will only occur after years of damages, instead of clear, and timely common carrier requirements enforced by the technically competent FCC.

I believe the FCC's recent action to reverse common carrier requirements for net neutrality are based on false premises. First, my ISP is clearly a telecommunication service similar to telephone service. When I had POTS, I dialed a number, ATT

transmitted by request to the third party, and if they answered, ATT maintained the connection. When I use the address bar of my web browser to enter a URL, the ISP transmits my request through the internet to the third party and if the third party responds, my ISP essentially maintains that connection until we are done. In neither example did I understand the underlying hardware or routing of the connection. In both cases, I used a simple, user friendly shorthand for the third party I wanted to communicate with, and the ISP or POTS translated my shorthand address and routed the communications. From the communicator's perspective, there is no difference between a URL and a telephone number. I recognize that my ISP bundles other services, like email, website hosting, and wifi hotspots, with my internet services, but in my 12 years of buying internet service, I have never used any of these bundled services. If my ISP offered to unbundle, I would gladly accept a lower price for naked internet service. I have no interest in bundled services like email, because they are not portable to other internet providers. I just want a simple, reliable connection to the internet.

The second false premise is that competition can mitigate adverse behavior by ISPs. I am not in a meaningfully competitive market for ISPs, and have never lived in a competitive ISP market. My service from Spectrum is no-contract, no-cap 60Mbps download (separate upload was not specified at time of purchase). The only other terrestrial service provider in the area is AT&T, who provides up to "up to" 50Mbps service with a 1Tb cap and 1 year contract for approximately 10% less per month than Spectrum. I had the misfortune to have AT&T service for one year, and their service call center was so inept and rude that I would hardly be pressed to consider them in the future. High latency satellite internet service is also available at 25Mbps/3Mbps with a 10Gb cap for 10% more per month than Spectrum. Neither of these are high quality for cable internet are high quality due to their contracts, caps, and technical limitations, and therefore they have a limited ability to influence price and service characteristics of the cable-based broadband service. If the FCC eliminates common carrier requirements, and Spectrum decides to block or prioritize certain traffic to my detriment, I only have the choice to pick between two slower, capped, contract-bound substitute services. Thus I and many others

Even if my ISP market had robust competition, removing common carrier requirements makes shopping for an ISP very difficult. Currently ISPs sell service based on download speeds, and customers like me reasonably believe they will achieve those speeds regardless of the third party they connect with. If common carrier requirements are removed, then I will need information on connections with hundreds or thousands of different third parties I currently or may wish to connect to in the future. Simple, reliable

connections are the very basis of the internet, and removing requirements that ensure all content is treated the same breaks the internet, especially for little guys like me, who can't stand up and negotiate a deal with a big guy like my ISP.