

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Notice of Inquiry on Improving)	GN Docket No 17-142
Competitive Broadband Access to)	
Multiple Tenant Environments)	

COMMENTS OF THE CITY OF SEATTLE

The City of Seattle hereby submits comments concerning the Notice of Inquiry (NOI) on ways to facilitate greater consumer choice and enhance broadband deployment in multiple tenant environments (MTEs). The policy of the City of Seattle is to ensure Seattle residents have access to equal, affordable, and competitive broadband internet services. Seattle concurs with the FCC’s goal of improving competitive broadband access to MTEs.

The City of Seattle believes that there are practices occurring in the MTE environment in Seattle that are adversely affecting competition and broadband deployment. One example is in the record for this NOI, filed by FastMesh.¹ FastMesh indicates that they are having trouble gaining access to serve MTEs in Seattle because of an existing “exclusive agreement with the cable company.” They are also frequently asked by MTE owners and operators for a share in the revenue that would be received by FastMesh for providing services to a building.

Seattle is currently surveying MTE occupants and MTE property managers in an effort to document the current state of competition in our MTE environment. Data from these efforts should be available for us to share with the FCC in August during the reply period.

¹ FastMesh Comment: Notice of Inquiry – GN Docket No. 17-142 filed June 15, 2017. FastMesh is “a small ISP who has been operating for 8 years. Over the course of 8 years, we have been welcomed into over 70 MDU/MTE properties within the Portland and Seattle area.”

Seattle does not believe that there are local regulations that may have the effect of inhibiting broadband deployment and competition within MTEs. Local actions are needed to address issues specific to MTE property owners and managers, who are business license holders and therefore subject to localities. This group of stakeholders is not subject to FCC rules and regulations in the same way that service providers are. Localities, in fact, share the stated goal of the FCC to improve competitive broadband access to MTEs, and they are taking positive steps to make this a reality in their communities.

Seattle believes that the Commission should not take any action that could serve to hamper the efforts of Seattle, Boston, San Francisco and other local governments to promote digital inclusion through voluntary efforts, competitive ecosystems, building codes and property management. We caution the FCC to be careful in its rulemaking to ensure that unintended consequences do not hinder local governments' ability to formulate policies and implement solutions within the MTE environment for the purposes of enhancing access to competitive broadband services.

The FCC should facilitate the compilation of workable solutions and methods that encourage competitive entry to MTEs. Compiling a list of proven measures that are working in this field would assist MTE property owners and local governments in choosing workable solutions that are applicable to their site-specific conditions. This would also assist in improving stakeholder's understanding of the complex relationship of MTE property owners and service providers.

Seattle anticipates filing detailed reply comments in this proceeding, in order to give the FCC a better idea of the current state of competition in our MTE environment and to give specific examples of what is working and what is not working for occupants of Seattle's MTEs.

Dated: July 24, 2017

Respectfully submitted,

A handwritten signature in blue ink that reads "Tony Perez". The signature is written in a cursive style and is positioned above a horizontal line.

Tony Perez

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