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Via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: In the Matter of Petition of USTelecom for Forbearance Pursuant to
47 U.S.C. Section 160(c); WC Docket No. 18-141; Category 1**

Dear FCC,

When is the last time you, personally, used the internet for a task that you feel was important? Consider how you would have felt had the internet not been available to you. I think you'll find that it is a crucial service nowadays. It is no longer a luxury; users with poor or no access suffer economically and socially. Access to the internet should be available to all, and must be available in a manner that is fair and equitable. Removing the right of local internet providers to lease lines wholesale from major telecoms is the antithesis of fair and equitable. It will leave rural areas with coverage gaps, raise prices, encourage shoddy customer service, and kill continuing innovations in broadband availability. I urge you to reject USTelecom's petition to end wholesale copper line sharing and to stand up for fair competition.

This issue affects internet users across the country, both in cities and in rural areas. In my home town of Berkeley, California, I have access to multiple options for service, but I have chosen a local ISP that leases wholesale because it offers faster service at better prices with far better customer service. My access is now via fiber to the node, but I have been looking forward to gigabit fiber, which my ISP is bringing to my local area *this month*. Clearly, there is active innovation in this space at the level of the providers who USTelecom's petition would damage. My provider's business model is founded on access to the wholesale market. That means that this petition directly threatens my internet access.

My retired parents, on the other hand, live in rural Michigan. For many years they struggled with slow dialup connections, avoiding the shoddy customer service and high prices of their only local cable provider. They recently gave up trying to make dialup work, because they could no longer suffer the poor service that made much of the internet inaccessible to them. They have no practical choice of provider. Rather than making it more difficult for innovative companies to start up in places where coverage is poor, we should be incentivizing local ISPs. We need more of them, not fewer. The argument that these companies are small players is actually an argument for improving their access, not taking it away.

Killing the wholesale market for internet access would be an irresponsible abandonment of the public trust by the FCC. It would drive up prices and set our country back even further in access to the internet. (Average internet access speed in the U.S. as of 2017 is less than two thirds that of the world leader[1], and 2015 statistics show the U.S. ranked 48th worldwide in percentage population with

internet access[2] at 74.6%). As long as reasonable access is out of reach for so many Americans, the conditions under which the proposed change would improve competition are clearly not here. Forbearing wholesale access will instead harm the competition we need to provide fair and equitable internet access to U.S. citizens and organizations.

[1] Data from Akamai Technologies "State of the Internet", retrieved from https://en.wikipedia.org/wiki/List_of_countries_by_Internet_connection_speeds

[2] Data from CIA World Fact Book, retrieved from https://photius.com/rankings/2017/communications/internet_users_percent_of_population_2017_0.html.

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