

August 29, 2017

Hon. Ajit Pai, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 17-108

Dear Chairman Pai:

As the Chief Financial Officer of Actiontec Electronics, a manufacturer of consumer products for the Internet and a certified Minority Business Enterprise (MBE), I can attest to the economic impact of government regulation. In the Internet space, a light-touch regulatory approach under Title I of the Communications Act is the best way to foster an environment where Internet companies of all sizes and types are best positioned to invest, innovate, and compete. By contrast, heavy-handed regulation under Title II of the Act makes it more difficult for Internet companies to succeed. Actiontec therefore commends you for proposing to re-instate regulation of Internet service under Title I.

Last month, Actiontec joined 16 other small and mid-size broadband manufacturers in filing Comments in this proceeding to voice support for your proposal and to address the negative economic impact of Title II regulation on small and mid-size manufacturers. Other commenters argued that the FCC's multi-year debate leading to the agency's 2015 decision to impose Title II regulation had caused economic harm not just to small and mid-size manufacturers but to the Internet entire Internet ecosystem by slowing network investment, noting that one report had theorized that investment dropped between \$150 and \$200 billion since 2010 and that another had estimated a 5.5 percent reduction in investment by the 12 largest ISPs in 2016 alone. Less infrastructure investment by ISPs negatively impacts the companies that supply Internet software and hardware to the detriment of innovation and jobs.

This unfortunate trend can be reversed by restoring the light-touch regulatory approach that had governed Internet policy before the FCC's 2015 decision to implement Title II regulation. To provide greater regulatory certainty, the FCC should set a national policy framework for broadband that follows the light-touch model, and Congress should come together to write and pass a bipartisan bill that puts basic net neutrality principles that are widely agreed upon into law.

Actiontec and other participants in the coalition of 17 small and mid-size manufacturers that had jointly filed comments in support of the Commission's proposal are voicing these points in local media. Examples include the following:

- Brian Paul, Actiontec: San Jose Mercury News (CA), "[Opinion: Net Neutrality Is Important, But Regulating Internet As Utility Is Too High A Price](#)"
- Mary Andringa, Vermeer: *The Des Moines Register* (IA), "[Reversing 'Net Neutrality' Will Boost Iowa Businesses](#)"
- Stephen Szymanski, Prysmian Cables & Systems: *The State* (SC), "[Ending Net Neutrality Will Help Consumers](#)"
- Simin Cai, Go! Foton: MyCentralNewJersey.com (NJ), "[Loosening internet regs a boon to business, public](#)"

We will continue to voice support for your proposal and thank you for your leadership.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Paul", written in a cursive style.

Brian Paul, Chief Financial Officer