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## Before the Federal Communications Commission Washington, DC 20554

In the Matter of

Restoring Internet Freedom

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WC Docket No. 17-108

## REPLY COMMENTS OF THE NATIONAL FEDERATION OF FILIPINO AMERICAN ASSOCIATIONS (NaFFAA)

August 29, 2017

Dear Chairman Pai and Commissioners Clyburn, O'Reilly, Carr, and Rosenworcel,

As a non-partisan and non-profit organization, the National Federation of Filipino American Associations (NaFFAA) is the largest affiliation of Filipino American institutions, umbrella organizations, and individuals in the United States. Our mission is to amplify the voices of Filipino Americans, advocate on behalf of their interests, and provide resources to facilitate their empowerment. And today, few issues are of more importance in facilitating the interests and empowerment of the Filipino community than access to broadband Internet.

Given the power of online and mobile communications, individuals, families, and whole communities cannot fully enjoy the benefits of our society, economy, and national life without reliable access to high-speed Internet. Commerce, education, community engagement and activism, health care, banking—nearly everything in the modern world requires robust Internet access.

Filipino Americans—like their compatriots of all races, creeds, and national origins—must have the opportunity to fully participate in the online experience. But that can only happen with continued build-out of broadband infrastructure. However, current regulations set by the Federal Communications Commission (FCC) are stymieing the kind of investment necessary to complete the job of bringing meaningful Internet access to all Americans.

The FCC's 2015 decision to reclassify the Internet as a "public utility" under Title II of the Communications Act of 1934 has come at the price of valuable investment. The ostensible reason for reclassifying the Internet in such a way was to protect net neutrality, a principle that NaFFAA strongly supports. Our organization believes that net neutrality, the principle that Internet Service Providers (ISPs) cannot discriminate against or block any legal data, content, or networks on the Internet, is necessary to protect free speech and the online experience.

Today, there is little disagreement over the need for net neutrality. Nobody—including the ISPs—argues in favor of blocking, throttling, slow lanes, or any other methods that would undermine net neutrality. However, NaFFAA is concerned when it comes to the use of Title II as a means to protect these principles. Because it imposes a higher regulatory burden on businesses, especially Internet providers, Title II creates unnecessary friction in the marketplace, drawing vital resources away from innovation and broadband investment.



Title II was originally put in place nearly a century ago to regulate traditional telephone services, which is why we are skeptical of its place in Internet regulation. Additionally, we must in part attribute the Internet's unprecedented rates of growth to the low-level regulatory environment that was in place since its advent.

Even more harmful than regulation is the deep and disruptive uncertainty created by the political back-and-forth that has dominated Internet regulation in recent years. The FCC is one of the primary places where political shifts have taken place at the expense of stable policy. Our organization appreciates the efforts the current Commission is undertaking to roll back Title II, but we also know a future administration could push rules back to a burdensome regulatory approach.

While we believe that it is important for the FCC to continue with this effort, ultimately, it must be Congress that sets permanent rules for net neutrality and Internet governance. We believe that codifying net neutrality while moderating regulatory burdens and fostering the kind of robust investment in broadband that will increase access and drive innovation are not mutually exclusive. Congress should act swiftly to develop such legislation so that providers have the regulatory certainty—and light regulatory burden—necessary for the next two decades of the Internet to be as successful as its first two.

In the modern world, one cannot fully participate in society without meaningful access to a robust Internet connection. Filipino Americans, like all Americans, both need and deserve to be able to attain this access, and the vast personal, professional, medical, and academic opportunities it affords. We urge the Commission to continue its attention to this issue, and to work with Congress to develop a permanent, legislative way forward when it comes to net neutrality and Internet governance.

Respectfully,

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