![Wikimedia Foundation logo]

August 30, 2017

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

In the matter of "Restoring Internet Freedom" (WC Docket 17-108)

The Wikimedia Foundation respectfully submits these comments in response to the FCC's notice of proposed rulemaking, published May 23, 2017, announcing the Commission's intentions to deregulate Internet Service Providers (ISPs) and to roll back the current net neutrality rules. We urge the Commission to refrain from eliminating the 2015 Open Internet Order's net neutrality rules, which are essential to the preservation of an open internet.

The rules protect internet users' access to legal online content by specifically prohibiting ISPs from discriminating among websites or applications by blocking or slowing some, or prioritizing access to others in exchange for a fee. Net neutrality is essential to prevent a new digital divide from opening between those internet users who can afford to pay to access all information they seek online and those who cannot afford that and thus have less access. Eliminating or degrading net neutrality rules would undermine the free and open internet essential for online collaboration and access to knowledge.

The Wikimedia Foundation is the non-profit organization that operates Wikipedia, the free online encyclopedia that is the Internet's largest and most popular general reference work.[1] Wikipedia provides every person in the U.S. with an internet connection free access to the world's knowledge. Unlike other large content platforms, we do not produce or curate the information on Wikipedia or the other Wikimedia websites ourselves. Instead, internet users from the U.S. and all around the world do. Our mission is to "empower and engage people to collect and develop educational content" and to share it globally.[2] To ensure that all American internet users can

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[1] https://www.wikipedia.org/.
[2] https://wikimediafoundation.org/wiki/Mission_statement

participate in and benefit from Wikipedia, we support the current Open Internet rules, which protect access to knowledge for everyone.

We support the FCC's effort to bridge the digital divide and to connect as many Americans as possible to the internet.[3] However, we think it should not happen at the expense of creating a new, different digital divide. By prohibiting blocking, throttling, and paid prioritization, the current net neutrality rules help make sure that every internet user in the U.S. can access any information found online. If these protections are rolled back, some people may only have restricted access to knowledge despite being online. For instance, if an ISP is allowed to create a tiered system of access to websites and applications, not all of its subscribers may be able to afford access to content they have today.

The implications of a lack of net neutrality would even be more harmful for those internet users who cannot afford their own broadband connections but use WiFi at libraries or public hotspots to go online. Without enforceable net neutrality rules, Americans who rely on public and shared access to the internet are likely to be negatively affected by reduced quality and speed of connections for education, research, information about public services, etc. The International Federation of Library Associations articulates this as follows: "Without net neutrality, the ability of libraries, as information providers, is compromised."[4] Thus, net neutrality rules are an important policy tool to prevent society from becoming "divided along unequal opportunities for education and work, as well as access to arts, culture, and a higher quality of life."[5]

The Wikimedia Foundation and the Wikimedia community subscribe to the value of openness:[6] anyone can contribute to and participate in Wikipedia. Enforceable net neutrality rules protect openness on the internet as a necessary condition for online collaboration and access to knowledge. The Open Internet rules facilitate the collaborative editing of articles on Wikipedia and collection knowledge on the other projects by protecting the ability of thousands of volunteers to freely and equally connect to the Wikimedia websites and to contribute and debate. Historically the original "end-to-end" architecture of the internet[7] enabled such massive collaboration.

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[3] FCC, Restoring Internet Freedom Notice of Proposed Rulemaking, FCC 17-60, para. 5.
[4] IFLA, IFLA Statement on Net Neutrality and Zero-Rating (2016) (available at: https://www.ifla.org/publications/node/10700).
[5] Meinrath Sascha, Losey James & Victor Pickard, Digital Feudalism: Enclosures and Erasures from Digital Rights Management to the Digital Divide, in: CommLaw Conspectus: Journal of Communications Law and Policy, Vol. 19, No. 2, 2011, pp. 423-479, 477.
[6] See https://en.wikipedia.org/wiki/Openness and https://wikimediafoundation.org/wiki/Values.
[7] See Saltzer Jerome, Reed David P. & David D. Clark, End-to-end arguments in system design, in: ACM Transactions on Computer Systems (TOCS), Vol. 2, No. 4, 1984, pp. 277-288, 278 ff.

Nowadays, the FCC's net neutrality rules protect it by making sure that everyone can access the services, applications, and content of their choice and that internet access providers do not abuse their market power or local monopoly position to restrict the free and open flow of information.

Free and unrestricted access to Wikipedia is an important way for many Americans to learn about the world in which they live.[8] However, the free knowledge that is accumulated and maintained on Wikipedia and the other projects does not originate there.[9] When Wikimedians write articles on Wikipedia they add citations and references to original sources that may contain more information about the topic. The more information they can access online, the more knowledge they can provide for others who read Wikipedia. The Open Internet rules are an important protection for this mechanism as they promote access to knowledge for internet users and consumers. They prevent the internet from becoming a tiered network and create a level playing field for diverse content providers online. New content providers, maybe even the next Wikipedia, depend on rules against blocking, throttling, and paid prioritization to be able to offer their services to a wide audience via the internet.

By prohibiting unfair practices, the rules promote an internet, in which collaboration and access to knowledge can flourish and from which all Americans can benefit. As we explain above, openness is a value that is deeply embedded in the Wikimedia community and a condition under which Wikipedia has developed and continues to grow. A roll-back of the current net neutrality rules would negatively affect many Americans' ability to find the information they seek online and will instead create a new digital divide, at a time when about 90 percent of U.S. adults use the internet.[10] We believe that everyone should be able to participate in knowledge. Therefore and for the reasons outlined above we urge the FCC to abstain from eliminating the current net neutrality framework in the U.S. while continuing its work to bring all Americans online.

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Respectfully submitted,
Wikimedia Foundation
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[8] In 2011, more than half of American internet users said they they look up information on Wikipedia, see http://www.pewinternet.org/2011/01/13/wikipedia-past-and-present/

[9] https://en.wikipedia.org/wiki/Wikipedia:No_original_research

[10] http://www.pewinternet.org/fact-sheet/internet-broadband/