

**Before the FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

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Restoring Internet Freedom

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WC Docket No. 17-108

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REPLY COMMENTS OF TWITTER, INC.

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Summary

Twitter connects people to what's happening in the world and allows them to see all sides of a topic. Every two days, approximately 1 billion Tweets are sent by 328 million users around the world.

On the Net Neutrality Day of Action held on July 12, 2017, we invited our users to share their views on the issue, resulting in more than 400,000 Tweets about #NetNeutrality in a 24-hour period. Given the heightened civic interest surrounding the open Internet proceedings, we urge the Commission to consider carefully any changes to the current regime.

Twitter supports the current Net Neutrality rules embodied in the Open Internet Order adopted by the Commission on February 26, 2015, and enacted on March 12, 2015. These commonsense rules are working and providing certainty and predictability for our users who rely on open, unfettered access to the Internet.

We appreciate the opportunity to comment as a company and on behalf of our users. Twitter believes: 1) Net Neutrality is one of the most important free expression issues of our time; 2) a free and open Internet helped foster Twitter's growth as a company; 3) Maintaining Net Neutrality will enable continued economic growth and innovation in the U.S. and globally; 4) U.S. leadership in Internet policymaking--and U.S. national economic interests--are promoted by open Internet rules in the U.S.

Freedom of Expression Online

American democracy is built on freedom of expression. As Benjamin Franklin said, "Freedom of speech is a principal pillar of a free government: When this support is taken away, the constitution of a free society is dissolved." Increasingly, Americans are going online to enter the public sphere. According to a March 2017 poll, 57 percent of Americans shared their political opinions or feelings via social media channels. Nearly 80 percent believe social media channels impact public policy outcomes, and more than half said social media had some impact on their voting decision.

Twitter allows every user to have a voice. As a global platform for free expression and live conversation, Twitter has become a significant medium to give voice to the voiceless and to speak truth to power. Our open platform facilitates conversations and connections that would have been unlikely or impossible before the first Tweet was sent in 2006. From popular uprisings that challenge oppressive regimes during the #ArabSpring to local tragedies that highlight social injustice in #Ferguson, Missouri, these moments could not have emerged from local connections to reach an international audience without the free and open conversation that Twitter facilitates.

Furthermore, Twitter has advanced how elected officials and candidates communicate with constituents and the electorate, allowing them to connect in real-time on a global scale without permission from large corporate gatekeepers. At least 856 Twitter accounts belong to heads of state and government and foreign ministers in 178 countries, representing 92 percent of all United Nations member states, with a combined audience of 356 million followers. Because of platforms like Twitter, virtually anyone can share his or her views on issues of local or national importance with government leaders. As a result, leaders have a stronger understanding of both the people whom they represent and issues of civic interest as well as increased accountability.

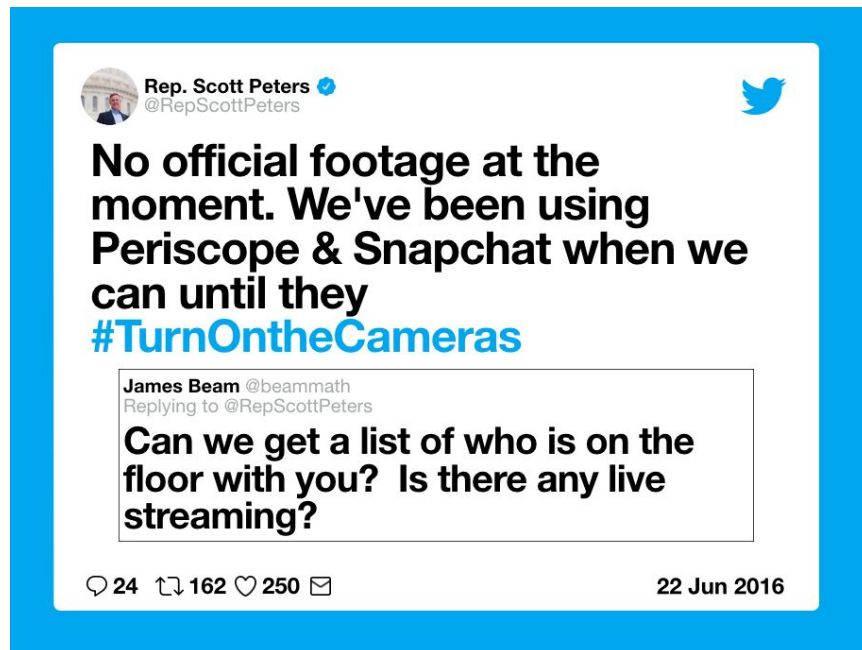
In the U.S., President Trump uses Twitter on a frequent basis to share his thoughts and policy positions with more than 37 million followers and with the world. All 100 senators and 427 members of the U.S. House of Representatives have official Twitter accounts, which they use to contribute to national discussions on topical issues. Twitter also gives users a front-row seat to the legislative process by regularly live-streaming U.S. House and Senate hearings, allowing users to watch substantive political proceedings from their smartphones or computers.



To illustrate the magnitude of Twitter's role in the U.S. political process: during the 2016 presidential election, 17 million related Tweets were generated during the debates, along with 4.6 million live stream views via Periscope, our video application. The Democratic and Republican conventions generated 47.3 million Tweets with the hashtags #DemsinPhilly and #RNCinCLE, and more than half a million people live streamed convention channels through

Periscope. Between the last debate and election day, over a billion Tweets about the U.S. presidential election were sent.

Unfettered access to the Internet has also allowed people to use technologies, including Periscope, to transcend attempts to silence political speech. In June 2016, members of the U.S. House of Representatives used Twitter's Periscope to live-stream a sit-in on the House floor when House leadership turned off traditional video channels. The feed, powered by our technology, was broadcasted on C-SPAN and cable networks around the world.



Net Neutrality is one of the most important free expression issues of our time. Without Net Neutrality, Internet Service Providers could charge content providers gratuitous new fees to reach Internet users and discriminate in the prioritized delivery of such content, frustrating the free flow of information. Without Net Neutrality in force, ISPs would be able to block content they don't like, reject apps and content that compete with their own offerings, and arbitrarily discriminate against content providers by prioritizing the Internet traffic of some over others. Because broadband Internet access is increasingly provided by fewer and fewer companies in a concentrated ISP marketplace, smaller and noncommercial voices may be impacted adversely because they are unable to pay a broadband toll for "fast lane" service. Allowing ISPs to determine what content is relegated to the backwaters of the Internet in second or third-tier status could reduce the visibility and impact of important voices in the local, national, or global media mix. In this context, Net Neutrality is a modern-day safeguard to protect freedom of expression.

Without strong rules supporting Net Neutrality, Twitter's core value of promoting and supporting the freedom of expression of our users is at risk.

Economic Opportunity

Twitter began as a text-based 140-character startup in 2006 and has since grown into an international company with thousands of employees and a service that incorporates pictures, video, and live streaming to show all sides of what's happening in the world.

A free and open Internet was critical to our growth as a company since its inception. Today, Twitter is reshaping the news landscape by providing live-streaming content, including original and interactive news that is more accessible and affordable than traditional cable. Just last quarter, we delivered more than 1,200 hours of live premium video from existing and new content partners. Our video offerings spanned 625 events reaching 55 million unique viewers. During the same period, Periscope streamed 76 million hours of live user-generated video.

The uptick in live-streaming online, fueled by Twitter, is creating end-user demand for broadband, which in turn, creates more investment and improvement in the overall network, often referred to as the “virtuous circle of innovation.”

Foundation of Innovation

What is true for Twitter as a company is also true for startups across the country. Net Neutrality is foundational to competitive, free enterprise, and entrepreneurial market entry – and reaching global customers. With strong net neutrality rules in place, you don't have to be a big shot to compete. Anyone with a great idea, a unique perspective to share, and a compelling vision can get in the game.

This powerful dynamic is not confined to the technology and startup ecosystem. Thousands of small businesses on Main Streets across the country use the Internet--and Twitter--to reach new customers or enhance their relationships with customers.

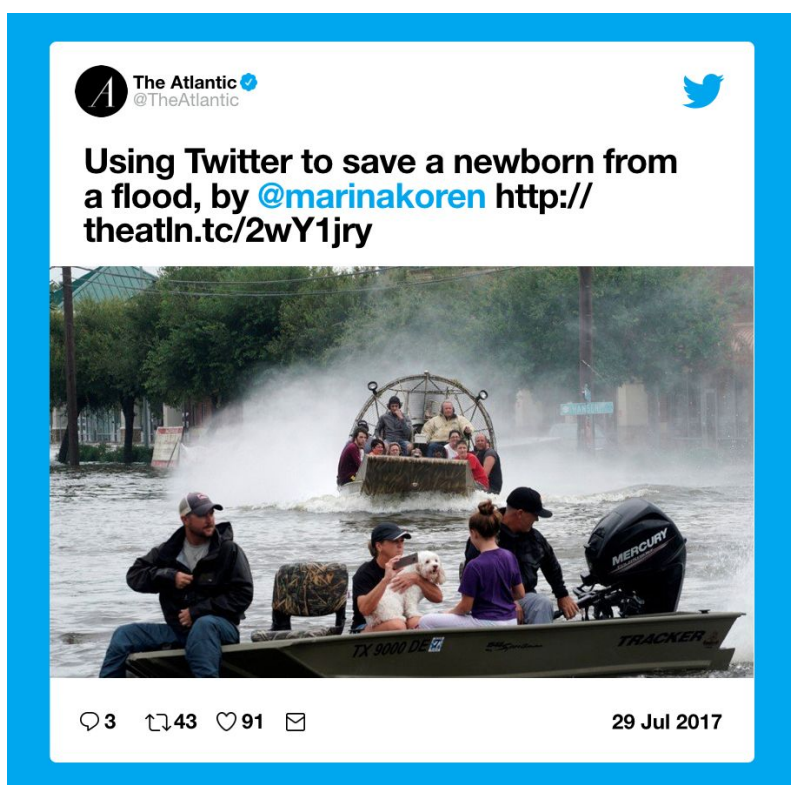
Because many small businesses rely on an open Internet, not only do we need strong and enforceable Net Neutrality rules, but also we urge the FCC to keep in place *ex ante* protections to prevent harm from happening in the first place.

Open Internet Enhances Public Safety

The free and unrestricted flow of information ensured by Net Neutrality is vital during times of crisis and disaster, especially as platforms like Twitter have become a critical supplement to civic infrastructure.

For example, organizations like FEMA, the National Weather Service, and the United States Geological Survey (USGS) use Twitter to disseminate important updates on severe weather and help people avoid dangerous situations. During a storm, and when the power is out, having this information readily available through Twitter and on a mobile platform saves lives. As we've

recently witnessed in Houston, Texas during #HurricaneHarvey, when 911 systems failed, people used Twitter to issue S.O.S. calls for help resulting in life-saving rescue missions.



Globally, because many countries look to the United States' regulatory regime as a model, erosions of Net Neutrality protections here could ripple around the world affecting life-saving free and open flow of information in different corners of the world: from tracking flooding in real time in Jakarta, calling for rescue in Manila, finding a safe haven during an attack in Paris or seeking help after an earthquake in the Philippines. That's because the broad public interest is served by open Internet rules because they foster broad public safety benefits.

Global Internet Leadership

The Internet was invented and created in America, and U.S. innovation and entrepreneurial activity drove its earlier and impressive growth. Many foreign governments and regulators have taken note and cited the successful constellation of smart U.S. government policies, the ready availability of risk capital, and open markets with low barriers to entry as the key ingredients ushering in U.S. global success in the Internet space. As a result, U.S. Internet companies are global in scope and world leaders in innovation. In some areas of the world, however, some countries have been eager to exercise more control over the Internet ecosystem, especially through their domestic carriers.

It has been a cornerstone of U.S. foreign policy to advocate for an open Internet for many years. Such advocacy and U.S. policy leadership have helped to ensure an open Internet architecture and related policies exist in most parts of the world. To the extent to which the FCC abandons this historic, successful policy advocacy and instead, adopts weak rules, other countries will take note. They will cite U.S. rules on Internet policy and seek even more controlling leverage for their own domestic carriers. If other countries mimic the proposed U.S. policy, we may see increasingly higher barriers to market entry and entry costs for U.S. Internet companies. Such a dynamic can only hurt U.S. economic prospects in the global Internet economy.



Resolution

We are pleased with the Commission's 2015 Open Internet Order, which provided strong and enforceable Net Neutrality rules. These safeguards protect free expression, innovation and the interest of our users. These existing rules keep the Internet free and open for people to speak and innovate while fostering innovation and spurring economic opportunity in the U.S. and around the world.

We urge the commission to abandon its efforts to weaken Net Neutrality protections.