



National Headquarters
930 East 50th Street
Chicago, IL 60615
Phone: 773-373-3366
Fax: 773-373-3571

Washington, DC
727 15th St. NW
Suite 1200
Washington, DC 20005
Phone: 202-393-7874
Fax: 202-393-1495

New York
5 Hanover Square
2nd Floor
New York, NY 10004
Phone: 212-425-7874
Fax: 212-968-1412

Los Angeles
1968 West Adams
Boulevard
Suite 300
Los Angeles, CA 90018
Phone: 323 734-3900
Fax: 323 734-3913

SF Bay Area Project
Phone: 510-869-2202
Fax: 510-763-2680

Atlanta
Herndon Plaza
100 Auburn Avenue
Suite 101
Atlanta, GA 30303
Phone: 404-525-5663 or
5668
Fax: 404-525-5233

Detroit
First National Building
660 Woodward Avenue
Suite 1433
Detroit, MI 48226
Phone: 313-963-9005
Fax: 313-963-9012

September 7, 2016

The Honorable Tom Wheeler
Chairman,
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Business Data in an Internet Protocol Environment, WC Docket 16-143; Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans, WC Docket 15-247; Special Access Rates for Price Cap Local Exchange Carriers, WC Docket 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Special Interstate Special Access Services, RM 10593

Dear Chairman Wheeler:

On behalf of the Rainbow PUSH Coalition, we urge the Commission to consider the unintended consequences of any final rulemaking affecting the “Business Data Services” (BDS) market. We respectfully request the Commission to consider its impact on American workers and small business, from whom the lifeblood of our economy flows. As an organization committed to these entities, we have a very distinct interest in this matter.

While we laud the Commission’s efforts to improve upon the current BDS rate structure, we urge you to consider the impact on “competition” in the marketplace. The unintended consequences of any decision that results in a “race to the bottom” for wages and workers’ rights can ultimately harm communities, especially those located in rural areas. Competition should foster service and innovation, and not result in lower wages and living standards for workers.

As the Rainbow PUSH Coalition has acknowledged in other filings, there is an implicit correlation between current and future investments in the ubiquitous build out of broadband infrastructure and the livelihood of workers and the businesses in which they are employed. From building, maintaining and servicing wirelines to ensuring that our nation’s young people from urban and rural areas have access to the Internet in their

schools and libraries, we feel strongly that the Commission's actions in this proceeding must result in:

1. A transparent and open process that includes all cable and telecommunications providers;
2. Accessibility to valid and current data to properly assess where competition exists in all parts of the nation; and
3. Appreciable and recognizable incentives for continued broadband network investment that lead to more livable wage jobs.

As you continue your deliberations in this proceeding, we ask that the Commission be mindful of these factors and promote a level playing field among all industries, and issue a decision that sufficiently addresses the needs of working families.

Competition must be based on accurate evaluation, especially given the highly competitive special access market. And, we must ensure that rushed decisions do not lead to unintended consequences, especially decreased marketplace and infrastructure investments, that ultimately impede the progress of people and their communities.

In closing, changes in this new digital economy should not come at the expense of the working men and women who build our nation's technology infrastructure and strive to provide the best service possible to our nation's urban and rural markets. Thus, we insist that the "Business Data Services" rules work to promote quality jobs with livable wages and expanded investment in new networks for all communities.

Keep Hope Alive,



Reverend Jesse L. Jackson, Sr.
Founder & President

Cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly