November 22, 2017

Federal Communications Commission

Re: 17-108 - Comment

Dear FCC Commissioners:

I urge you to reconsider your proposal to remove consumer protections on that most important and crucial resource, the internet. Please do not hinder competition and equal access by destroying net neutrality.

The internet deserves special recognition as a vital piece of American and global infrastructure. It should be regulated carefully and always in the best interest of the public, not on behalf of a half-dozen corporations. The internet is a key source of commerce, information, personal inter-connection, news, and entertainment. Because the internet is so important economically and personally, it deserves the same level of protection as other utilities, including the types of regulated technologies that the internet has largely supplanted.

The United States should be dedicated to demonstrating and modeling, especially to nations that restrict and throttle internet access, an open field of access. I do not believe that the United States should permit internet access and speeds of its citizens to be blocked, redirected, or throttled by anyone. We certainly do not want to emulate Iranian or Chinese internet policy with Comcast as the government proxy dictating internet access and the flow of information.

Allowing the piecemealing of internet services – restricting access to some uses without extra fees – allowing selective fast lanes for preferred services – and slowing or blocking access to competitor services will hurt both the national economy and individual households. American consumers could now be nickeled and dimed with extra charges and services for the same access that they have enjoyed previously. This process will also hurt the development and competition of new and competing companies and services which rely on the internet.

American consumers lack adequate alternative when choosing internet service providers (“ISP”). In most parts of the country there is a single choice for an ISP (i.e. no choice). These customers deserve protection and a guarantee that they will have the same type of access as Americans in other parts of the nation. Because, there are so few choices of internet providers, the reliance on ISP transparency is an insufficient market self-regulatory mechanism. Even if customers vehemently oppose the practices of an ISP, they will be forced to choose between no internet or adding to the profits of bad actor. In this day and age, this choice is akin to removing the internal plumbing of your house to spite the water company.

This is even more laughable given that many states have restricted competition with existing ISPs. If the FCC was really concerned with fostering competition it would adopt rules to preempt state and local laws prohibiting new private and public ISPs. If the FCC votes to abolish Net Neutrality rules, I would recommend that this also come with rules that require, foster, and promote competition for new ISPs and for existing ISPs to compete in new geographic regions.

Over reliance on ISP “transparency” is also laughable given the troubling recent history of ISP obfuscation, deliberate non-disclosure, and false advertising. The ISPs should not be trusted to govern the internet alone. Before the adoption of the current net neutrality rules, we witnessed deliberate throttling of internet speeds (a reduction in speeds is a reduction in access), we saw the rise of fake "unlimited" internet, caps on access, we have seen harmful anti-competition local and state laws, customers have been hurt and held hostage to extort money from competitors. If the ISPs are dedicated to "voluntary" net neutrality there should be no reason not to keep the fundamental protections and oversight of net neutrality in place.

Just like our democracy, internet access should remain well defended, and accessible to all.

Sincerely,

Rory Allen