

Dear FCC Chairman and Commissioners,

I am writing today to oppose the Restoring Internet Freedom (WC Docket No. 17-108) proposed rule change.

The entire premise of the proposed rule change is based on a fallacy--that since the classification of ISPs under Title II 2015, investment and expansion of broadband networks has fallen.

Yet, not a single publicly traded US ISP has ever filed with the SEC or told its investors that they have seen losses due to Title II classification. In fact, ISPs such as Comcast saw their investments grow over the past two year period, with no effect from Title II classifications<sup>1</sup>.

So why is this supposed "stifling of innovation" being used as a means of pushing through a removal of Title II classification from ISPs? The numbers clearly show growth year over year under Title II.

The other primary argument is that transparency of how an ISP chooses to regulate their network allows the consumer to see what the ISP is doing, and allows them to select another ISP if they don't like it. This is another fallacy--the majority of Americans do not have an alternative choice for an ISP. Their area is only served by a single carrier, so their choice becomes internet service or no internet service. As such, the argument that transparency will increase choice and competition is feckless in the face of consumers having no alternative or competitors in their market.

I cannot see a positive light in the proposed rule change. It only stands to stifle online innovation by allowing ISPs to openly flout fair traffic and transit rules, and pass on the costs to their customers.

I implore you to abandon the Restoring Internet Freedom docket, and maintain the Title II regulations on ISPs which allow for and promise an open and equal internet for all users.

Patrick Karjala

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<https://www.freepress.net/sites/default/files/resources/internet-access-and-online-video-markets-are-thriving-in-title-II-era.pdf>