

November 21, 2017

Mr. Jeremy Fretts, Architect
5150 Maris Ave., Apt 200
Alexandria, VA 22304

Federal Communications Commission
Washington, DC
Via electronic filing

Re: WC Docket No. 17-108 Internet Freedom Act

Chairman Pai, Commissioners, and FCC Staff:

I am writing to oppose proposed changes to the current Title II regulations regarding internet service utilities. Please vote AGAINST the deceptively-named "Internet Freedom Act," WC Docket No. 17-108.

In your continuing deliberations, please be sure to **RETAIN** the "bright line" protections against

- a) Throttling
- b) Blocking
- c) Paid prioritization

I am disheartened that the American people must once again take the FCC to task for your seeming favoritism toward telecommunications and media monopolies which are generally reviled by consumers. You wish to re-classify internet service as a non-utility. This is ironic: in my experience, few people hate their utility providers; many-- if not most--customers hate Comcast, Verizon, Time Warner (Charter), and the like. In fact, a 2017 study found Comcast to be the most-hated company in the United States.¹ Dish Network and Charter Communications also made the list of top 12 most-hated companies.²

In paragraph 24 of your Notice 17-60, you posit that internet service providers do not provide "telecommunications" services. Your technical precision in assessing the definition of "telecommunications," ignores its intent. Considering a telephone call: whether my spoken words are sent via electrons over copper, a beam of light, or as digital packets disassembled and re-assembled is irrelevant. In either case, my spoken, intelligible words are reconstructed at the designated point (by a mechanically vibrating speaker or a microprocessor) and delivered unaltered in their form and content.

The need for regulation, in fact, is greater because of the intermediary "nodes" you mention in describing transmission through the 'net. The threat of a service provider intentionally delaying,

slowing, or terminating communication through any one of the nodes is one of the primary concerns of those who defend “Net Neutrality.”

You argue extensively that internet service is not a telecommunications service. I will honor your assertion long enough to suggest that internet service INCLUDES telecommunications service, as a subset. At present, I have no conventional telephone service at my residence. My internet service provides communication by voice, text, and video. Because my cell carrier has weak coverage at my home, I also have a cellular repeater connected to my internet service. If a telephone call is the most rudimentary form of “telecommunications,” then I utilize my internet service for telephone calls every day.

Further, I argue that Skype, Facebook Messenger, VoIP services, and the like all depend on internet service as a *telecommunications service*. Each of these allow communication “*between or among points specified by the user, of information of the user’s choosing, without change in the form or content of the information as sent and received.*”

This definition refers not to *voice*, or *video*, but rather to *information*. Information readily suggests any form of data that *can be* transmitted, which would include all forms of electronic media and communications.

As an architect who works in multifamily housing, it is common to have a “telecom” room or a “tel/data” room for these utility service connections. Telephone, cable television, and data services are now interchangeable. These rooms ALWAYS include high-speed data services of some kind. Some of our clients now opt for either a “phone” company or a “cable” company to service their building, rather than both, because they provide the same services to the end-user. In everyday life, they are interchangeable. At my residence, I don’t even have a choice of high-speed data provider. Fifteen minutes away from the FCC headquarters, I have NO competition for Internet Service – just like I have no competition for telephone, power, water, or gas.

It is no secret that telecommunications and cable TV providers have been acquiring media companies at record pace. The “free market” is predictable: it will acquire; destroy competition; and pursue the interests of shareholders at the expense of all else – it must. For a time, the competition will prove beneficial to citizens. And then it will become destructive. In the world of telecommunications (or information services) and content creation, this powerfully affects public discourse, and availability of ideas and resources. The FCC has long stood for the public interest, balancing the inevitable corporate interests against the public interests.

An open internet—a technology developed through investment of public monies-- has come to be an essential support to freedom of speech, opportunities for small business, and competition for goods and services sold *through* it. It is more than a business, it is now a critical part of the infrastructure of modern America – and deserves to be managed and regulated like one: a utility.

Finally, please remember that the previous Rule, adopted in 2015, came after record-setting public comment in favor of strong, hands-ON net neutrality protections. A “light touch” is not desired.

Please reconsider your positions; protect net neutrality; and reject deregulation.

Sincerely,

Jeremy C. Fretts

cc: Hon. Donald Beyer, Member of Congress

Mr. Ajit Pai, Chairman

Ms. Mignon Clyburn, Commissioner

Mr. Michael O’Rielly, Commissioner

Mr. Brendan Carr, Commissioner

Ms. Jessica Rosenworcel, Commissioner

¹ Sauter, M., & Stebbins, S. (10 January 2017). America’s most hated companies. *24/7 Wall St.* Retrieved from <http://247wallst.com/special-report/2017/01/10/americas-most-hated-companies-4/>

² IBID