DATED: 22 Nov 2017

RE: FCC Proposal File #17-108

Subj.: Net neutrality

**To whom it may concern**: I wish to state my support for the concepts and lofty objectives of INTERNET NEUTRALITY for two very simple reasons: (1) in this matter the FCC must clearly act as the nation’s “public utility commission” (as verse a patchwork of State regulates) and (2) avoiding the mistakes of the 1982 break-up of the AT&T monopoly.

**FIRSTLY**: The role of the FCC as the nation’s “public utility commission”.

Important public services which are sourced from single suppliers (such as: water & sewer, natural gas, telephone, electricity etc.) are generally regulated by a designated “State Public Utility Commission (PUC)” as a regulatory agency of government to insure: reasonable access, fair pricing and safe service for all consumers (individual, commercial and governmental).

Given the ubiquitous naturel of the Internet, State based regulation is both highly impractical and foolish; thus the FCC is the only regulatory body which can protect the general public from abuse “monopoly like” practices which inevitability result for single-source suppliers.

**SECONDLY**: Mistakes of the 1982 break-up of the AT&T monopoly.

The inefficient, wasteful, expensive and time consuming 1982 dissolution of the AT&T Telephone Monopoly should act as a useful guide to all future regulators as it which highlights the negative attributes which are associated with an unrestricted “free market approach” to deregulation. It should be noted that while the AT&T dissolution created several Regional Bell Operating Companies, in the years which followed; all of these RBOC companies have been reconstituted into a national “Duopoly” of local phone access (i.e., The “New” AT&T and Verizon).

THE KEY POINT in the FCC’s decision on this matter must include:

1. respect for both physical capital investment as well as technological innovation / research must be respected and appropriately compensated; and
2. ultimate consumers must be appropriately protected from:
   1. unreasonable connectivity costs (i.e., price gouging) and
   2. inaccessible content (i.e., Intellectual Property (IP), such as News, Weather, Financial Information and entertainment)

**PLAN B:** The Commission may which to consider an alternative to direct regulatory control over INTERNET NEUTRALITY by:

1. Stipulating that ALL Internet Distribution Assets (i.e., the wires, switches, routers, backbone, etc.) be placed (title transferred) into a Federally Chartered 503(c )(12) Corporation (see also: The Tennessee Valley Authority, The Port Authority of New York and New Jersey, etc.) which would then apply standard charges all users.
2. Asset contributors would be compensated at Fair Market Value of the assets being transferred with long term US Government bonds; and the resulting interest charges be factored into the cost of customer service together with ongoing maintenance expenses.

**CONCLUSION**: (1) I wish to remind the Commission that which Internet Service was introduced to the general public – it was initially considered to be a profligate waste of time; while today – entire industries are built or rely upon its power and accessibility. (2) Because the decision which the Commission makes in this matter with have expansive and long-term consequences for American Industry and its People – the FCC must base its Internet Neutrality Regulations upon solid and defendable economic and legal facts – regardless of ideological perceptions.

Thank you for the opportunity to comment upon this important regulator matter.

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