

December 5, 2017

proposal to gut Title II net neutrality protections,

EX PARTE

Ms. Marlene H. Dortch

Secretary Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

Re: Ex Parte Submission in CS Docket No. 17-108

Dear Ms. Dortch: In a series of comments and ex parte letters submitted over the last year in the above-captioned matter, various interested parties have addressed the desirability of a “network neutrality” regime for cable broadband.

- Editor Goldberg-

EXCLUSIVE TO THE TIMES

This project began as a letter to Editor to the times last week triggered by FCC commissioner Rosenworcel's opinion published last Friday.

The multiple hurricane of important issues swirling about Net Neutrality will interest your readers, advance the public interest, and evolve the debate prior to the Federal Communications Commission's crucial Dec. 14 meeting. Hope yo stop this rapidly developing tragedy in its tracks. It is unfortunate this hits us while so many readers/voters are distracted by holiday festivities.

If Net Neutrality is dead, get ready for slow lanes and higher prices for existing service levels.

At 668 words, I'll hope you can find space for this subject matter.

I am a 6 time elected director of the Upper San Gabriel Municipal Water District and a former Director of Metropolitan Water District of Los Angeles (both positions emeritus now, since 2012). Had many letters printed in the Times' distant past, but THE TIMES has never published my opinion before.

William Robinson

1146 East Louisa Avenue

West Covina, CA 91790

=====

## Title: Gutting Title II net neutrality protections

Federal Communication commission (FCC) chairman Agit Pai's policy to "free the internet" is akin to big pharma's freedom to screw the American consumer. FCC's declaratory ruling, report, and order, WC Docket 17-108 looms as a rapidly developing tragedy unfolding while the public is distracted by holiday festivities. The newest public comment period closes on Dec. 7 (absent possible service denial attacks) for the Dec. 14 FCC meeting. Tell Congress this ruling must be delayed.

FCC misunderstands the internet or doesn't care. Faulty FCC "fact" sheet findings are error laden fabrications. For example, "stifled broadband investment" in the two years since net neutrality implementation is mistaken. Existing policy is not hurting investment in broadband networks. The existing analysis is too narrow. A reanalysis for the past five-year period would produce a more useful and relevant result. And an independent analysis would show glaring deficiencies.

The republican controlled FCC labors under wrong facts, lobbying group's interests, and begs getting sued. I'd wager a dozen state attorney's general will defend American consumers against this public resources giveaway to telecommunication giants.

Since "credible allegations that many of the comments were submitted by bots and others using the names of deceased people" have emerged. Commissioner Rosenworcel's idea to hold hearings across the country is especially heartening in light of evidence that over 96 percent of net neutrality already submitted comments were bot driven fakes. The grave nature of contemplated changes demand that the commission insure their understanding of public opinion is accurate before triggering radical reform. Additionally, Verizon has purchased a former net neutrality proponent, Tumblr, thus silencing one energetic opponent. Tumblr led the Net-Neutrality fight—then Verizon bought it; skewering yet again public opinion results.

Privacy issues the big 3 cable/telcos are ill-equipped to deal with include the "Dot-Net Passport" program to protect user names(s) and password(s) the web has grown to demand; breached databases fraud. Disagree? Research the Anthem Blue Cross data breach class-action settlement for around \$115 million which compromised the most personal identity data of 78 million clients.

The silver lining is that this display of corporatocracy greed among the billionaire media owners club will trigger courtroom blow back. Future court outcomes may restore the first amendment of the US constitution, gravely afflicted for many years. Democracy's demise is inevitable in face of unrestrained billionaire concentrated ownership media outlets impacts upon our existing "free" press. The internet represents the last bastion of unfettered and uncontrolled public discourse.

Cable/telcos, free to adjust their business plans absent net neutrality and FCC complications, will have a field day as Internet Service provider (ISP) competition declines. Cable/telcos will see endless opportunity: including blocking websites to prioritize their own content, throttling (discrimination), and "pay-to-play" business plans; unconscionable intrusion on existing freedom. Cable bills will rise as consumers purchase premium fast track service. If you love your cable bill these past five years, then you'll love this latest FCC gambit.

Revitalized competition would lower the cost of internet usage for American consumers. Gutting network neutrality by installing fast "toll roads" are unnecessary. Consumers may soon pay by the click or per hour for internet usage. Current free services replaced by fee payments.

Obviously Anti-Trust law, besides Robinson-Patman Act, must be applied to regionalize FCC rulings' proponents: Verizon, AT&T and Comcast. Time is ripe for Congress to intervene on behalf of the public interest.

Sadly, Chairmen Pai's way on Dec. 14 means America's internet mirrors Mexico, Portugal, and the Peoples Republic of China policy instead of mirroring the Swedish model where digital-pipeline usage is cheap, universal and infinitely diverse. The FCC activity is explicitly giving cable/telcos a big thumbs-up.

ISP competition is crucial and must be protected. Like the FCC, the Federal Power Commission (FPC) has the authority to review and reject tariffed rates and practices, Ordering and maintaining interconnectivity in both arenas is vital. A revitalized amended Telecommunications Act of 1996 should favor competition, otherwise specific laws need to be devised to insure the competitive delivery of telecommunications services by competing ISP's.

FCC has been "captured" by a Verizon led oligarchy. FCC should administer the rules of the competitive game. The fact of regulation does not imply a blanket antitrust immunity. But Congress' consideration for the inadequacy of the current regulatory system to deter anticompetitive behavior must be revisited.

Meanwhile, FCC should do their job. Antitrust enforcement in the Industry must commence. Anyway you choose to look at it. Agit Pai proposal is an unmitigated disaster for American values and economy; Cable/telcos, greed prevails.

Respectfully submitted,

/s/William Robinson

Internet entrepreneurs

West Covina, CA

CC Chairmen Agit Pai

Commissioner Mignon Clyburn

Commissioner Michael O'Rielly

Commissioner Brenden Carr

Commissioner Jessica-Rosenworcel

