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Public Comment on Docket 17-108: "Restoring Internet Freedom"

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Greetings,

I'm writing to respectfully ask the FCC to deny the proposal to reclassify broadband as an information service, and keep it classified as a telecommunications service offered by providers subject to regulation as common carriers.

Many broadband providers offer a bundle of web services, but the fact that we commonly call these types of companies ISPs, or Internet Service Providers, underscores that internet connection service is popularly viewed as the primary product these businesses provide. ISPs may offer some information services like cloud storage and email, but consumers treat these services as separate from and auxiliary to the broadband they utilize.

Information services are too secondary a part of broadband provider offerings to be considered definitive, as many Americans nowadays obtain services like email or cloud storage via providers other than their ISP. For example, I have Spectrum, but use Gmail, Google Drive, Adobe Creative Cloud, and iCloud.

It used to be more common for people to use email addresses obtained via their ISP, like EarthLink addresses, but these have fallen out of favor as people discovered that using these bundled products tied them to a particular provider, and left them vulnerable to unfavorable price and service changes. This shift toward non ISP-based email addresses happened because the interests of consumers were not being well-served when ISPs had too much control over consumer web services.

Chairman Pai has argued that broadband doesn't meet the statutory definition of telecommunications, because telecommunications deliver information between "points specified by the user," yet "broadband Internet users do not typically specify the 'points' between and among which information is sent online. Instead, routing decisions are based on the architecture of the network, not on consumers' instructions, and consumers are often unaware of where online content is stored" (FCC 17-60, p. 10.)

He then goes on to say consumers are not specifying points because they aren't specifying IP addresses or caching servers when they navigate the internet, and asks how the phrase "points specified by the user" should be interpreted, so that it carries an "independent meaning."

This phrase can be meaningful if user-specified points are defined as points on a map, rather than as street addresses. Knowing a street address is one way to navigate to a point on a map, but there are others.

When you take a taxi, for example, there are a few ways you can define your destination in order to reach it successfully . If you don't know the street address, you might reference a popular landmark, or ask to be dropped off at a particular intersection.

Insisting that citing an IP address is the only way to specify a point on the Internet is the equivalent of a taxi driver refusing to let passengers out of the car unless they can recite the exact street number of their destination.

User-specified points should be understood as places in the virtual cultural landscape that is the internet, and not as "places where online content is stored."

Please continue to define broadband as a telecommunications service, and regulate it as such.

Best regards,
Ann-Marie Holman