

Dear FCC Chairman Wheeler and Commissioners,

I write you to give you my opinion about the proposed rule changes to the definition of broadband and let me be clear... I categorically support changing the definition of broadband to increase it to at least 10Mbps downstream, 1Mbps upstream however and real unlimited data or very generous data caps. Faster would be even better as many other countries are far, far ahead of those speeds already and leaving the US behind. The companies have admitted that wireline congestion is not a problem so there is no reason they cannot deliver on better speeds and no or more generous caps to unlimited plans. Also latency should be kept low, this is pretty good right now and it needs to be maintained, low latency is very important. The companies make billions in profits and face no competition so they certainly can afford the consequences of changing the definition, they just want to squeeze their users to make more money any way they can because it is never enough for greedy corps!

As the US pioneered the information / digital age we should be ashamed for letting broadband speeds slip to be so low. It is clear that the Internet is crucial to the development of the economy and nearly all facets of life in the world we live in today and it is not acceptable to have sub-par internet service in this day and age and with the wealth the companies who are fighting this change have.

Here I give my main reasons for supporting a seed increase in the definition of broadband and I respond and refute some arguments from companies including AT&T, Verizon, Comcast, TWC and especially their industry representatives like NCTA, who are against any change or improvement.

1. In this filing (<http://apps.fcc.gov/ecfs/document/view?id=7521827885>) AT&T writes that 10Mbps is more than enough to meet most Americans' needs at present, and NCTA agrees, yet they are against even a change to that speed. This is incredibly short-sighted thinking. With full households relying more and more on a sharing a single connection for bandwidth intensive activities, what barely meets the consumers' need today is rapidly changing, so a definition should account for future progress with particular emphasis on how fast the need for more and faster data is increasing. The definition should be proactive in this regard and encourage the kind of thinking that more capacity is always better, amongst all involved. Fast internet should be a guaranteed utility for a strong country with a healthy economy!

2. Cellular service cannot replace wireline as a "functional equivalent for fixed broadband." Wireline connections have lower latency, better signal:noise ratio and, most importantly, higher bandwidth caps. Many companies allow just a few GB of cellular data at a fast speed for about the cost of a wireline connection and it is crucial that people are able to connect their cellular devices to their wireline networks to do any data intensive tasks such as updating a device's operating system. It is really atrocious that the companies are trying to suggest cellular is a legitimate replacement. Rural customers can give up any hope of wireline internet if cellular is allowed to substitute. It's not in the same league, don't allow it!

3. I believe the FCC's 2014 Household Bandwidth Scenarios table accurately expresses bandwidth needs as they exist today. However, the definition should account for future growth as the current speeds may very well not be sufficient before FCC revises the rules again due to the pace of innovation on the internet. Also, there is no reason these faster speeds cannot be achieved as evidenced by poorer countries with much better internet service at all tiers than the US. For companies such as AT&T and Verizon to be picking this table apart, saying the calculations are inaccurate by small amounts, is disingenuous and again, shows they are reluctant to move forward to invest in their networks without lots of pressure or outright being forced to.

In conclusion I would like to revisit my suggestions regarding the new rules being considered for the definition of broadband.

- Speeds of 10/1Mbps should be a minimum, we should be at 25/5 already but, by 2020 at the latest please!

- It is very important that data caps are addressed in the FCC's definition, fast

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speeds are meaningless if they can only be used for a short time without incurring expensive overage charges due to caps. There is no reason other than to increase profits, for providers to change to usage based billing of wireline networks as their business model is quite profitable as is and its usage based billing would hurt consumers. These companies never make changes to benefit the customers only their shareholders. There is no network congestion now, the providers all admit this, so there is yet another reason for no reason for usage based billing. Also, if network congestion becomes a problem there are more productive solutions such as offering heavy users incentives to throttle their connections at peak times.

- Latency must continue being regulated it is very important to have low latency, as is evidenced by satellite connections with fast advertised speeds that are, in reality, practically useless due to their high latency. Low latency is important for a number of different applications, services and security devices.

- Part of the reason current speeds are sufficient is because developers can not begin to consider making the bandwidth intensive applications of the future. If capacity were there it will be used by new innovators. We have to think long term because the companies have no incentive to do so

- There should be separate benchmarks for cellular and wireline services. They are totally different and cellular networks do not have the bandwidth capacity that wireline networks do nor do they have the ability to scale speeds up and add more capacity in the way wireline networks can. Some usage based billing, especially for heavy users, makes sense at this time for cellular data but there is no reason for it regarding wireline connections.

- Cellular is in no way a suitable replacement for wireline internet. It will put even less pressure on companies to serve rural locations with quality wireline service which is contrary to the FCC's Connect America program. It has speed, latency and capacity issues as well. It is easily overwhelmed by a number of users in a small area unlike wireline networks. It is in no way a suitable substitute.

- Based on my previous comments about satellite internet connections they must be considered the lowest quality of all and not able to compete for broadband recognition at all, I think their advertising is misleading to say the least.

- Finally, I agree with these comments made by Netflix, "The revised benchmark should account for any terms of service that may restrict broadband use, even when a broadband connection is technically capable of achieving minimum threshold speeds, A gigabit broadband service that heavily penalizes consistent use may be worth less to consumers than a 10Mbps broadband service with no cap or penalty."

Thank you for your consideration.

Respectfully,
--Eric Case
Bremerton, WA