



1200 G STREET, NW, SUITE 350 PH: 202.296.6650
WASHINGTON, DC 20005 FX:
202.296.7585

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Submission, *Protecting and Promoting the Open Internet*, GN Docket No. 14-28; Applications of Comcast Corporation and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Applications, MB Docket No. 14-57; Applications of AT&T, Inc. and DIRECTV for Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-90

Dear Ms. Dortch:

COMPTEL files this letter in the above-referenced proceedings to inform the Commission of a recent panel discussion on interconnection and the over-the-top (“OTT”) video marketplace it held as part of its semi-annual COMPTEL *PLUS* Convention & EXPO event.

The panel discussion, *Interconnection and the Over-the-Top Video Marketplace*, took place on October 6, 2014, and included the following speakers: Robert Beury, Vice President & Chief Legal Officer, Cogent Communications; Chris Drake, Chief Technology Officer and Executive Vice President, iconectiv; Hank Hultquist, Vice President, Federal Regulatory, AT&T; and, Milo Medin, Vice President, Access Services, Google, Inc. Fiber. The panel discussion is available at <http://vimeo.com/110494786>.

Key highlights of the panel discussion included:

- *Cost per bit for delivering content has fallen over time.* The speakers discussed the cost per bit for delivering content continues to decrease over time (17:55-18:05) due to continued improvements in network efficiencies (37:50-38:37), but consumers have not benefited proportionally (58:58-1:00:24).

- *Broadband Internet access providers sell access to content providers' services.* Consumers subscribe to broadband services to get access to legal content without obstacles (11:05-11:25, 21:17-21:30, and 34:58-35:20), and the goal of broadband Internet Service Providers (“ISPs”) should be to provide that service (33:20-33:50).
- *Downstream OTT video streaming is dominating peak Internet traffic.* Today’s heavy user tends to be tomorrow’s normal user (36:07-36:49), and consumers’ data usage consumed is increasing—a trend expected to continue due to the tremendous growth in streaming video, and consumers’ turn to higher-definition streaming (37:05-37:27).
- *Locating Content Delivery Networks inside broadband Internet access providers’ network reaps benefits for both that provider and its subscribers.* Because co-locating Content Delivery Networks (“CDNs”) near data centers reduces transit costs and enables better delivery of OTT video streaming to subscribers at a lower cost (11:45-12:58), the industry is evolving toward colocation as a general business model (31:29-32:02).
- *Asymmetrical network traffic is becoming the norm.* While broadband ISPs tend to sell broadband services designed on the assumption that consumer traffic will be asymmetric (45:52-48:10), ISPs continue to have settlement-free interconnection agreements that assume a fairly symmetric traffic flow (45:02-45:19).

Respectfully submitted,

/s/

Angie Kronenberg
Chief Advocate and General Counsel