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November 12, 2014

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**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *Protecting and Promoting the Open Internet; Framework for Broadband Internet Service*, GN Docket 14-28, GN Docket No. 10-127

Dear Ms. Dortch:

On November 10, 2014, in connection with the above-referenced proceedings, Jeff Campbell, Vice President - Government Affairs for Cisco Systems, Inc. ("Cisco"), Jason Friedrich, Head of US Government & Regulatory Affairs for ARRIS Group, Inc. ("ARRIS"), Peter Pitsch, Executive Director - Communications and Associate General Counsel for Intel Corporation ("Intel"), Jing Wang, PhD, Director – Corporate Programs for Intel China Ltd, and the undersigned with Wiley Rein LLP met separately with Priscilla Argeris, the Wireline Legal Advisor for Commissioner Rosenworcel, and Amy Bender, Commissioner O’Rielly’s Wireline Legal Advisor.

As suppliers to broadband providers, edge providers, and end users, Cisco, ARRIS, and Intel explained their interest in a healthy Internet ecosystem in which all participants thrive. As was explained during the meeting, the best way to achieve this objective is for the Commission to adopt Open Internet rules that encourage broadband investment and innovation, not discourage it.

During the meeting, Cisco, ARRIS, and Intel expressed their support for the rules proposed in the Notice of Proposed Rulemaking in this proceeding,<sup>1</sup> which represent a balanced approach that will benefit consumers as well as all sectors of the Internet ecosystem. We also discussed paid prioritization, noting that prioritization is an inherent feature of the Internet that does not result in the creation of purported “fast lanes” and “slow lanes.” We also explained that prioritization arrangements can have important consumer benefits and that prohibiting all such arrangements would harm consumers and would be antithetical to innovation.

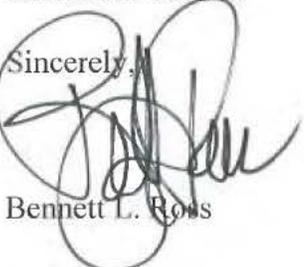
<sup>1</sup> *Protecting & Promoting the Open Internet, Notice of Proposed Rulemaking*, GN Docket No. 14-28 (rel. May 15, 2014).

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Finally, we discussed President Obama's statement in support of regulating broadband Internet access service as a Title II "telecommunications service." We explained that Title II regulation of broadband services would be unlawful and unwise, relegating the industry to years of litigation and uncertainty. We also explained the negative international ramifications of Title II regulation of broadband services in the United States. We urged that the Commission continue its light touch regulatory treatment of broadband services by relying upon its section 706 authority as the legal predicate for any Open Internet rules.

Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced docket.

Sincerely,



Bennett L. Ross

BLR:rw

cc: Priscilla Argeris  
Amy Bender