

November 25, 2014

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

Re: GN Docket Nos. 14-28

Dear Ms. Dortch:

On the afternoon of Wednesday, November 19, 2014, Matthias Kurth and Caroline Van Weede of Cable Europe, along with Manuel Kohnstamm and I of Liberty Global, met separately with **Commissioner Pai** and staff member Brendan Carr and **Commissioner O’Rielly** and staff members Erin A. McGrath and Amy Bender.

That morning we also met with the following FCC Bureau staff:

Wireline Competition Bureau
Deputy Bureau Chief, Matthew DelNero

Competition Policy Division
Claude Aiken, Deputy Division Chief

Office of Strategic Planning & Policy Analysis
Scott Jordan, Chief Technologist
Robert Cannon, Senior Counsel
Antonio Sweet, Technology Analyst

Office of Engineering & Technology
Walter Johnson, Chief, Electromagnetic Compatibility Division

Office of General Counsel
Andrew Erber, Attorney Advisor

At the meetings, we provided an update on the status of net neutrality and IP interconnection issues in Europe and discussed a new study on the Future of the Internet released by Arthur D. Little.

We discussed how the European net neutrality legislative debate is progressing and the direction this is currently taking.

Latest proposals under consideration by EU Member States in the Council would not impose an outright ban on paid prioritization and do not propose to regulate specialized services, taking instead a light touch, principle based approach to regulating the open internet and ensuring traffic

management is not used for anti-competitive intent. The scope of proposed legislation under discussion also does not extend to regulating IP interconnection.

Regarding the ADL report, this shows that IP interconnection is a sector experiencing intense competition, falling connectivity costs and higher investment resulting in new IP interconnection arrangements beyond transit and peering, leading to greater choice in higher quality Interconnection models at lower prices for big- and small application service providers and broadcasters.

It also explains how the technical and commercial choices of IP interconnect and content players largely determine the quality of broadband delivery and hence, consumer experience. Given the high level of diversity, experimentation and investment less than 1% of all IP interconnection agreements end in litigation or dispute, and there is no evidence of IP interconnection competition issues emerging.

We also discussed the dangers of over regulation to investment and innovation.

Details of the presentation are contained in the attached documents.

Respectfully,

/s/ Chris Hutchins

Chris Hutchins

Attachments

cc: FCC staff in meetings