

16 December 2014

VIA ECFS

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

Re: *Protecting and Promoting the Open Internet*, GN Docket No. 14-28

Dear Ms. Dortch,

On Friday, December 12, 2014, Lauren Van Wazer, Vice President, Global Public Policy, of Akamai Technologies, Inc. (Akamai), undersigned counsel, and Brita Strandberg of this firm met with Matthew Berry, Chief of Staff to Commissioner Pai, and Nicholas Degani, Legal Advisor to Commissioner Pai, to discuss this proceeding.

Akamai explained that it provides a primarily software and cloud-based suite of content delivery and acceleration technologies. Akamai's solutions benefit not just its wide variety of customers and consumers, but also create efficiencies that benefit all participants in the Internet ecosystem. Using Akamai's services, content providers are able to distribute their content at the edge of the Internet, on servers close to end users, thereby increasing speed and reliability even during usage spikes without additional capital costs. In particular, because Akamai caches content at the network edge, located closer to end users, content often is already on a server close to the end user. When users request particular content (*e.g.*, downloads a song or video), Akamai directs that user request to an optimal edge server that is likely close to the user and not overloaded, and the content need not transit and re-transit the entire ISP network with each individual request. As a result, Akamai's services effectively offload traffic from the middle mile, enabling content to by-pass the Internet's often congested and costly peering and interconnection points, saving carriers money and improving performance for both big and small content providers. In addition, Akamai's algorithms enable the intelligent delivery of Internet traffic, which further increases the speed and reliability of content delivery.

Akamai's distributed architecture platform also enhances the security of networks. Akamai mitigates attacks closer to the attacker at the edge of the Internet and further away from the content providers' origin servers and it provides protections across all pathways to data centers. By blocking attack traffic originating overseas before it can reach the U.S., Akamai keeps enormous volumes of attack traffic from clogging U.S. networks, thereby benefitting all Internet users in the U.S., whether or not they are accessing content on the Akamai platform.

Finally, Akamai explained that the record currently before the Commission is insufficient to support regulation of peering and interconnection, and noted the possibility that voluntary

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industry principles could address the current challenges in the peering and interconnection market.

Sincerely,

Scott Blake Harris

Scott Blake Harris
Counsel to Akamai Technologies, Inc.

cc: Matthew Berry
Nicholas Degani