

January 12, 2015

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FILED ELECTRONICALLY

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;
Framework for Broadband Internet Service, GN Docket No. 10-127

Dear Ms. Dortch:

On January 8, 2015, Michael Olsen, Emmett O’Keefe, and Peter Corea from Cablevision Systems Corporation, and the undersigned met with Roger Sherman, Jim Schlichting, Stephanie Weiner, and Michael Janson. At the meeting, Cablevision supported the recent ex parte letter filed by the National Cable & Telecommunications Association (NCTA).¹ In particular, Cablevision explained that the Commission should carefully consider the specific characteristics of unlicensed WiFi service in applying any open Internet rules. All of the reasons the Commission previously gave for allowing additional flexibility in the management of licensed mobile broadband networks,² are true with respect to public WiFi services like Cablevision’s Optimum WiFi, and, indeed, such networks may face even greater network management challenges. Accordingly, to the extent the Commission applies open Internet rules to public unlicensed WiFi services, it should provide for significant flexibility that recognizes such networks’ specific capacity and congestion constraints, and, at minimum, regulatory parity with licensed mobile broadband networks in applying any “reasonable network management” standard.³

¹ Letter from Matthew A Brill to Marlene H. Dortch, GN Docket Nos. 14-28 & 10-127 (Dec. 23, 2014) (“NCTA Letter”).

² See *Preserving the Open Internet*, Report and Order, 25 FCC Rcd 17,905, 17,956-58, ¶¶ 93-96 (2010).

³ See *NCTA Letter* at 25.

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Please contact me if you have any questions regarding this meeting.

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder

cc: Roger Sherman
Jim Schlichting
Stephanie Weiner
Michael Janson