

February 6, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

On Wednesday, February 4, 2015, Scott Bergmann and Krista Witanowski of CTIA – The Wireless Association® (“CTIA”), met with Erin McGrath and Amy Bender of Commissioner O’Rielly’s office to urge the Commission to adopt a mobile-specific, Title I approach to its open Internet rules.

CTIA explained that competition and differentiation in the U.S. mobile broadband market are delivering an open mobile Internet and creating an innovative mobile ecosystem that benefits U.S. consumers and businesses. Consumers have more competitive choices for mobile broadband and benefit greatly from providers’ efforts to differentiate their offerings. Mobile broadband services also are more challenging to provide as a technical matter. In short, wireless is different and the Commission was correct in 2010 in its decision not to subject mobile broadband to the same requirements as wireline broadband. Any additional rules that apply to wireless must take into account the unique competitive and technical attributes of wireless service and avoid impeding the differentiated offerings and choices mobile consumers enjoy today. CTIA explained that mobile wireless carriers need the flexibility to respond rapidly to consumer demand, differentiate their service offerings, and develop innovative and pro-consumer options in order to create value for their consumers. We encouraged the Commission to ensure that the differences inherent in mobile broadband are reflected in each of the FCC’s new substantive rules.

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office. Please direct any questions to the undersigned.

Sincerely,

/s/ *Scott K. Bergmann*
Scott K. Bergmann

cc (email): Erin McGrath
Amy Bender