

18th February 2015

VIA ELECTRONIC SUBMISSION AND ELECTRONIC E-MAIL

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: The real threat to the open internet is zero-rated content

Dear Chairman Wheeler:

Today, the World Wide Web Foundation published the second part of a guest blog which I written titled "The real threat to the open internet is zero-rated content". The first part was published yesterday.

The post makes seven points:

1. Zero-rating has now become the neuralgic point in the net neutrality debate on both sides of the Atlantic
2. In 2014 the net neutrality debate shifted from the narrow definition of no blocking and no throttling to an outright ban of paid prioritization
3. No! Zero-rating and other harmful forms of price discrimination are eating away the neutrality of the internet
4. The core is issue in the net neutrality debate is the price of open internet access
5. If zero-rating is not banned mobile operators are incentivized to set low volume caps in order to enhance the appeal of their own zero-rated services
6. Banning zero-rating leads to lower mobile internet access prices, evidence shows
7. Net neutrality rules that do not ban zero-rating practices will prove toothless

The blog post is attached to this letter and is also available online here: <http://webfoundation.org/2015/02/guest-blog-the-real-threat-to-the-open-internet-is-zero-rated-content/>

Sincerely

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cc:

Chairman Tom Wheeler

Commissioner Mignon Clyburn (via electronic mail)

Commissioner Michael O’Rielly (via electronic mail)

Commissioner Ajit Pai (via electronic mail)

Commissioner Jessica Rosenworcel (via electronic mail)

Jonathan Sallet

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