



June 19<sup>th</sup> 2015

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

Re: GN Docket No. 13-5, *Technology Transitions*; GN Docket No. 12-353, *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*; WC Docket No. 05-25, *Special Access for Price Cap Local Exchange Carriers*

Dear Chairman Wheeler:

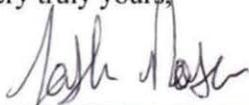
On behalf of bway.net, I am writing to support the ongoing efforts of the Federal Communications Commission to preserve and to promote competition within the telecommunications marketplace. Our company is taking this extraordinary step to lend our support because a competitive communications market creates cost and efficiency savings and provides improved service; both of which are very important to our company and our customers. Competition contributes to industry growth, new jobs, and typically results in cost savings and convenience for the consumer. This is particularly true in the business consumer markets, irrespective of the size, location, or number of customers that our company has.

bway.net is a wholesale company wherein we sell internet access, broadband, and other services to end user businesses. Because we need to meet the needs of our business customers, who may have single or multiple sites, we often find that the only viable "last mile" network connection continues to be the one provided by the incumbent provider. If the incumbent's last mile connection is the most cost-effective facility to meet our needs, then our connectivity provider, Global Capacity, will use that connection to enable us to serve our customers by either allowing us to interconnect to their network so that we can deliver a finished service to our customers, or by providing internet access over that connection. Importantly, Global Capacity is uniquely able to provide competitive alternatives to locations using its One Market Place platform to ensure that we are able to obtain the most cost-effective connection to our customers' business locations. Without competitive access to these connections, the monopoly once held by the incumbent providers over the business market would be restored and our ability to obtain cost-effective connections, regardless of the technology would be significantly hampered.

We wholeheartedly embrace a transition to new technologies, including internet protocol; in fact, in many situations, the connectivity that Global Capacity provides to us is technology agnostic to provide us the flexibility to meet our customers' needs. However, the transition should not impact the ability for business customers to obtain cost-efficient facilities, regardless of whether the facility is copper, coax,

fiber, cable, or any other medium. The transition is timely, but it should not be used as a basis to re-monopolize the communications market. We support a determination by the FCC that will ensure that we will have competitive choices regardless of the technology transition taking place.

Very truly yours,



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Name: Josh Rosen

Title: Director / vice President

cc: Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
Jonathan Sallet  
Matthew DelNero