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Director  
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April 22, 2016

Submitted via FCC's Electronic Comment Filing System (ECFS)

The Honorable Thomas Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20054

*RE: Expanding Consumers' Video Navigation Choices, MB Docket No. 16-42; Commercial Availability of Navigation Devices, CS Docket No. 97-80.*

Dear Chairman Wheeler,

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, appreciates the opportunity to comment on the Federal Communications Commission's (FCC) notice of proposed rulemaking on the commercial availability of video navigation devices.

Manufacturers are intense users of the telecommunications infrastructure. Our industry leverages the Internet and connected technology to drive groundbreaking innovations in our products and processes. The growth of faster and more capable high speed broadband networks, which has been fueled over the past 20 years by a sensible policy toward government regulation, has transformed the way the manufacturing industry operates and has contributed significantly to the growth of this sector in the United States. Our nation's telecommunications infrastructure has helped our shop floors become some of the most highly sophisticated and connected environments in the world. Any threat to continued investment in this infrastructure is a cause for concern for the manufacturing sector.

The NAM strongly supports maximizing user choice in the selection of communications and technology solutions and opposes regulations that have the potential to dampen private industry's incentive to invest in broadband technology. The proposed rulemaking on video navigation choices may result in increased compliance costs, re-engineering of networks, and new hardware requirements therefore diverting critical resources away from enhancements to the telecommunications networks the manufacturing sector is dependent on for driving innovation.

The NAM is committed to working with the Commission and encourages it to move forward only with a framework that ensures fair, technology-neutral competition for all providers while expanding consumer choice. We are concerned the current proposed rule does not adhere to this guidance.

*Leading Innovation. Creating Opportunity. Pursuing Progress.*

Manufacturers are leading an innovation revolution that is supporting an estimated 17.6 million jobs and contributing \$2.09 trillion to our economy. At a time when new technology developments are leading to opportunities for even more job growth in the manufacturing sector, we cannot afford new policies that take them away.

*Comments Submitted by:*

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