

Good morning. I am writing this email to voice my opposition to the proposed reasoning behind NPRM 02-33, "Appropriate Framework for Broadband Access to the Internet over Wireline Facilities". It is my opinion that treating broadband internet access as an "information service" is not a correct view. It is a communications tool, more akin to an old party line, rather than a content delivery system.

My name is Brian Bilbrey. I am a published technical author, systems administrator and product designer. My current position is as a freelance systems and network consultant, and writer. I have no vested interest in any commercial perspective on this debate -- I write today as one concerned citizen who hopes that the recent advances in communications technology and massively interconnected networks will become, and remain, available to all.

In my understanding, "access" involves connecting my computer (and other digital communications devices) to the Internet. "Information" is quite different -- information is in the ones and zeros that enter my computer to be processed by it. Information can flow into my devices over a variety of "access" -- over a wire, over a cable, over an optical fiber, or through the air (either as radio-frequency energy, or as light-wave energy). That is, the same sequence of ones and zeros can enter my computer by any of these access methods. So to equate "access" with "information", as does NPRM 02-33, is simply incorrect.

It was not always so. The telephone network was developed to deliver one kind of information -- the human voice. It was engineered for voice, and it gave access to voice. Everything else that it carried (e.g., touch tones, modem signals, signalling information to set up telephone calls) was either an exception, or an adjunct to voice telephony. The wire that came into the house could not be distinguished from the service it provided. It was the same for television and radio -- each had its own dedicated infrastructure (be it a wire or a frequency band) to carry a specific type of information.

The great advance of the Internet was that its fundamental architecture separated "access" from "information". Any one of the various forms of access to the Internet puts one in touch with an infinite array of information. Furthermore, providers of this information (information service providers) do not own special infrastructure -- all they need is a server and any of the several methods of Internet access. As a result, the Internet is wide-open to innovation, and we have applications and services like email, Web browsing (in all its manifestations), ecommerce, Internet telephony, streaming audio and video, chat and instant messaging.

Not a single one of these information (and communications) services was brought to market by a telephone company or a television company or a cable operator or a broadcast radio

network. No, access is a fundamentally different business from "information service". To equate "broadband access" and "information service" -- as NPRM 02-33 proposes -- would be a horrendous step backwards.

Without separation, "broadband access" as an "information service" is likely to resemble the failed Interactive TV experiments of the early 1990s. TV-on-speed is not "the Internet" -- and vice versa.

Sincerely,

Brian P. Bilbrey.

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"The ships hung in the sky in
much the same way that bricks don't."
Doug Adams, H2G