

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

Petitions of AT&T Inc. and BellSouth Corporation)
Under 47 U.S.C. § 160(c) for Forbearance from) WC Docket No. 06-
125
Title II and Computer Inquiry Rules with Respect)
To Broadband Services)

**COMMENTS OF
THE NATIONAL ASSOCIATION OF MANUFACTURERS.**

The National Association of Manufacturers (NAM) hereby submits its comments in support of the above-captioned petitions for forbearance relief. As explained below, NAM has great confidence in how advanced telecommunications capabilities are being deployed to all Americans in a timely and reasonable fashion. We do, however, have concerns that unnecessary regulation in the advanced telecommunications market would harm American consumers and impose burdens on American manufacturers.

INTRODUCTION

The NAM is the nation's largest industrial trade association, representing small and large manufacturers in every industrial sector and all 50 states. Headquartered in Washington, D.C., the NAM has 10 additional offices across the country.

The forbearance requests referenced above note that the broadband services at issue here are subject to robust, national competition from a wide variety of competitors. The Commission has adopted a national framework for evaluating broadband competition and has consistently applied that national framework in every broadband order it has issued over the past five years – an approach that has been approved by both the D.C. Circuit and the Supreme Court. The NAM respectfully submits that existing industry practices are serving broadband consumers well and the Commission should maintain its highly successful “hands-off” policy toward the Internet, which will help ensure that the broadband marketplace continues to drive investment, innovation and job-producing economic growth.

DISCUSSION

The Commission has succeeded in helping to shape a competitive and robust Internet through its deregulatory policies. The NAM urges the Commission not to "turn back the clock" on successful deregulatory broadband policies that have promoted more investment and robust competition. The deployment of broadband networks, applications and services for consumer, small business and enterprise usage have been successful. This success is a result of increased investment, innovation, job creation and economic growth.

FCC implementation of deregulatory policies applied to broadband networks and services continue to encourage broadband delivery (supply), adoption (demand)

and investment (capital). These deregulatory approaches have been successful the last five years. However, new unbundling/line-sharing obligations could hold back the deployment of advanced broadband networks/infrastructure to the great detriment of the U.S. manufacturing sector. Billions of investment dollars have been committed to expanding manufacturing infrastructure, all made possible due to clarity and certainty of FCC deregulatory policies. Supporting the parties' forbearance requests before the commission is consistent with the deregulatory policies and associated benefits over the last few years.

The NAM supports the continued deployment of broadband networks on a national basis. Granting the forbearance petitions will eliminate the placement of old, outdated regulations on new high-capacity broadband services.

CONCLUSION

The NAM commends the Commission for a remarkable job in encouraging competition through its regulatory forbearance. By doing so, it has promoted a competitive and innovative Internet that enables broadband network operators to take advantage of technology to maximize capacity, avoid bottlenecks, protect privacy and meet the differing technical requirements of a wide range of Internet services and applications. Healthy markets require no regulatory intervention. The NAM encourages the Commission to avoid unnecessary regulation that might raise costs to consumers, limit efficiency, or disrupt efforts to provide and manage

additional capacity so that American consumers can enjoy the full benefits of the Internet.

Respectfully submitted,

**THE NATIONAL ASSOCIATION OF
MANUFACTURERS**

By:

A handwritten signature in black ink, appearing to read "Marc-Antony Signorino". The signature is fluid and cursive, with a long horizontal stroke at the end.

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