Comcast has been on an advertizing campaign in our area for months, touting their fiber optic services for cable internet and phone services. Now they quietly cap users with a supposedly generous 250Gb limit on their internet, all the while offering an inferior 8Mb bandwidth, relative to any other "fiber optic" service.

Verizon, just a few miles south offers truer fiber optic services to their customers of up to 50Mb down and 20Mb up, bandwidth, without a single complaint to their customers about network congestion. The only limitation keeping this type of service from being offered in the Portland Metro area is an FCC ruling, giving Comcast a "protected area of operations". This lack of competition, has further emboldened Comcast to place further service restrictions on the consumer, and created a false economy for the company to operate. Conditions on the other side of the river are by far worse for the Vancouver, WA residents. It can take as long as a month for them to even get service, much less that their service conditions are even more onerous.

I recently chatted with a friend, who also had Comcast services. He was a frequent user of NetFlicks on the web. He found one day he could no longer receive the home page of NetFlicks. He could easily ping their server and it returned a good latency at the time. After a few weeks trying, he contacted Comcast, and suddenly, they fixed his problem. This was no fix on his part, nor services call to his home system, but a mysterious "flip of the switch" on the part of Comcast. I do not think this quite fits the proffered "network management" profile that Comcast has promoted as their way to control congestion issues. It smacks of restraint of trade, and a potential of systematically reducing customer access to services that Comcast also sells or competes with their service model.

Even the network management that they have unilaterally created has the earmarks of yet another "profit center" for Comcast to tap, at the expense of their customers. It has come down to their reducing the out flow of data from their (lack of) service areas, as compared to the influx of data. Their management of traffic is nothing more than trying to tilt the data flow in their favor, to create more profit, by having something other than a balanced flow of data with the rest of the world. Has anyone considered how much in the way of resources their supposed "network management" actually takes relative to the amount of resources the users use? We the customers are paying for that as well. Truth be told, the resources squandered by the company, coupled with the low speed caps enforced, are the only cause for any network congestion. Now users must contend with usage caps, they neither want or deserve. At the "standard rate" of 6Mb/s there is no wonder that there is congestion. With the company constantly shooting reset commands at any user they "think" "might" be using the system in any way they don't deem to allow, is the direct cause of having to constantly reinitiate any downloads that cause the traffic they complain about. When one considers how companies such as Vuze.com operate, it makes one wonder how much unnecessary traffic that Comcast creates actively blocking or "managing" such content.

There is no longer a viable contention left for Comcast to be able to claim network congestion as their excuse. Either they have oversold the capacity of their network, which flies in the face of their announced fiber optic service capability, or, they simply refuse to provide reasonable services within their "protected" service areas, by artificial capping and speed limiting their customer base.

What I find irksome, is their current Docsys 2.0 capability of 36Mb, and the soon to be adopted Docsys 3.0 availability capable of 50+ Mb bandwidth, all the while holding customers down to 6Mb or "premium" 8Mb bandwidths. I loathe the lies and deception this company has chosen to perpetrate upon the consumer. I respectfully beg the FCC to "release" Comcast from the limitations that their system has to properly service their customer base. Either reduce their "protected areas" of service, such that they no longer have a capacity, speed and load balance problem, or open the service areas to competition, so that consumers may realize that their services from the web may be protected, from a company that has an agenda, and a marketing team that strives to provide the absolute minimum services to their customers. It is becoming blatantly obvious that a company that sells phone (not Vonage) and television/movie (not NetFlix, not Joost, not etc. etc.) services, has a vested interest in finding ways to limit customer choices and access to the same. It may also be worth looking at the benefit of breaking up the company so that the services do not compete with the other alternatives on the internet that challenge them to allow.

It should also be considered that Comcast charges much higher rates for internet access when they can't include their own services packages, such as television and phone services. I have notices there are no phone/internet package bundles to be had from the company. This speaks to the issue that the television/movie business has taken corporate center stage to the normal operations of the other services.

Even with the higher rates to the internet only customer, Comcast still has some internal corporate imperative to restrict bandwidth and access to the internet. This can only be distilled down to Comcast wanting to force users in any way possible, to have to use their services exclusively. This flies in the face to the intent and spirit of the internet, as a public resource. Comcast did not "invent" the web, nor did they create or contribute to its ubiquitous nature. They have, however, started on a campaign to reserve their customer base as if it were a resource they "own" in this service restricted area.

I find it incomprehensible that a few miles south of here, in much smaller service customer base areas, that Verizon can create the infrastructure for the internet, that Comcast claims to have here in Portland, yet cannot provide. This is plain and simple proof, that Comcast has no intention to be a good or respectable corporate actor, in the context that the FCC has granted as having a privileged area of operations. Comcast has breached the intent and letter of the contract between the Public, the FCC and Comcast. They have taken off on a unilateral mission at the expense of the public, and the FCC needs to be equally unilateral in their responsibility to the public, which it has ceded to the less than tender mercies of Comcast. When I find that a company has a marketing group, dedicated to offering the least service, for the maximum profit possible, I find it is time for competition to be restored. It is in fact way over due.

These are but a few examples of what Comcast has in store for their "protected" consumer base. It is obvious they intend to try to restrict their consumer base (as they seem to think they own us) to continually increasing restrictions in the future. I can only plea that the FCC take action, and remind Comcast that we are not an owned resource, for them to use and abuse as they please. We need not be victims of some marketing team and false economy created by the FCC for the sole pleasure of Comcast

to use and abuse. Not everyone is in harmony with the obvious television/movie centric preoccupation of Comcast. Comcast does not, and chooses not to operate, in the publics' best interest. The following text is taken from the Vuse.com configuration file itself. I think it demonstrates but a fraction of what Comcast is up to:

d11:ASN Detailsld2:as5:334903:bgp15:71.193.128.0/174:name46:DNEO-OSP5 - **Comcast Cable Communications, Inc.**ed2:as0:3:bgp0:4:name0:ee31:**Auto Upload Speed Debug Enabledi1e19:AutoSpeed**

…(omitted for brevity and privacy)…

Completion Flag For Completed DownloadsOnStarti0e42:**SpeedLimitMonitor.setting.choke.ping.counti1e45**:SpeedLimitMonitor.setting.download.limit.conf3:LOW43:**SpeedLimitMonitor.setting.upload.limit.conf3**:LOW58:**SpeedManagerAlgorithmProviderV2.setting.download.max**.limiti674560e56:**SpeedManagerAlgorithmProviderV2.setting**.upload.max.limiti30720e42:StartStopManager_iFirstPriority_ShareRatioi500e15:TCP.Listen.Porti58414e14:TabBar.visiblei1e27:Tracker Client…

Now we are soon faced with an ever shrinking download cap on the users. One has to ask if and when Skype is safe from Comcast shrinking the amount of talk time available with a cap on download limits? Is this an attempt to restrict users from using alternatives to Comcast's own phone services?

I quite well remember hearing Comcast, among others, whine that they needed a credible "protected" base of users to facilitate the cost of the infrastructure. Now it has been demonstrated that Verizon has managed to accomplish more, for their customers, using bedroom communities, and providing a performance based product offering, than Comcast has managed, with a lock on an entire metropolitan community. There is no excuse for this kind of disparity, other than profiteering. A false economy created by the FCC, for the benefit of Comcast. I think the laughable billboards plastered around the city, with Comcast bragging about their Fiber Optic infrastructure, is a slap in the face to the customers that they shirk every day. It may be heady ego stroking for the board members, but it is testament to the lack of interest on the part of Comcast, in what the customers deserve for a service utility, and the money that users have invested, through using said services.

While I am sure that Comcast can divine some glib response to these charges, the bottom line is that they are, in the long term, negligent in their responsibilities to the customers. They have exceeded the temperance of the users and the good faith for the "opportunity" to have a closed client domain with which to operate. The sad reality is that it is only the knowledgeable customers that realize the extent that Comcast has abused the public. For all of the ad monies spent to toot their own horn, using customer revenue to do this with, is unconscionable.

Once again, I can only plead that the FCC revoke the protected domain parceled out to Comcast, and allow competition to set the course aright for the users, or at least something be done to correct this insane abuse of the public trust.

Thank You

David M. Corneille