

**Summary of Comments of the National Organizations
GN Docket No. 09-191, WC Docket No. 07-52
filed January 14, 2010**

Background

Sixteen National Organizations filed Comments in response to the Commission's Net Neutrality NPRM,¹ to ensure that those among us who lack equal access to broadband remain in the forefront of the Commission's agenda as it proceeds with this rulemaking.

- First, the Commission should ensure that net neutrality rules are neither written nor applied adversely to the participation of minorities online and in society.
- Second, the Commission should ensure that even if the rules are truly neutral in their text and application, that they do not, in their very "neutrality," lock into place and perpetuate into the future the vast current racial disparities in broadband access, adoption, and informed use.
- Permanent digital second-class citizenship is unacceptable on every level. The Commission must avoid the enormous social and moral costs that would attend the creation of a permanent digital underclass and consider the impact of its race-neutral policies on minorities.

First Class Citizenship For Minorities Is On The Line In Broadband Policy

- Minorities must be prepared for the translation from an industrial to a digital economy so they are not left behind as they were in the nation's transition from an agricultural to an industrial economy.

Minorities Face The Digital Age Far Behind In Income, Wealth, Education, and Access To Capital

- Large disparities in wealth and median household income between White Americans and minorities leave minorities with far less discretionary income than other groups.

An Open Internet is Vital to Democratic Values

- We support efforts to codify the principles in the NPRM, but are troubled at the lack of evidence presented to indicate the proposed regulations will close, and not widen, the digital divide.

If Drafted Or Applied Incorrectly, Net Neutrality Rules Could Negatively Affect Minorities

- Net Neutrality rules could increase the price of broadband for minorities and impede investment and deployment that would bridge the digital divide.
- Platform neutrality is a longstanding civil rights principle and the Commission should open a proceeding to determine the impact of search engines, regardless of whether it adopts net neutrality rules.

¹ See Preserving the Open Internet, GN Docket No. 09-191, WC Docket No. 07-52, FCC 09-93 (rel. Oct. 22, 2009) (the "Net Neutrality NPRM" or the "NPRM").