



NATIONAL GAY & LESBIAN CHAMBER OF COMMERCE
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Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 09-191

March 16, 2010

Dear Chairman Genachowski and Commissioners:

The National Gay & Lesbian Chamber of Commerce® (NGLCC) is the business advocate and direct link between lesbian, gay, bisexual and transgender (LGBT) and allied business owners, corporations, and government. Founded as the exclusive organization for certification of LGBT owned businesses, the NGLCC works to foster mutually beneficial opportunities for small businesses and corporate members. The NGLCC represents the interests of more than 1.4 million LGBT businesses and entrepreneurs and is committed to forming a broad-based coalition of LGBT owned and friendly businesses, professionals, and students of business for the purpose of promoting economic growth and the prosperity of its members.

Over the past year, our organization has repeatedly voiced concern regarding the Commission's Open Internet NPRM in our filings to date, and we remain unconvinced of the necessity for additional regulation.

Broadband helps our members run their businesses by broadening their base of operations and giving them access to customers throughout the nation and even the world. Online management tools and video conferencing are just few ways owners can stay connected and informed on operations while traveling.

The Commission's work on the National Broadband Plan, through the use of workshops and public forums, clearly demonstrated why broadband is vital to the needs and interests of many communities, including small business owners and entrepreneurs. However, the Commission has yet to adequately engage stakeholders in discussions on the Open Internet NPRM, or even prove that additional regulations are needed. Furthermore, before the Commission moves forward with the proceeding, there needs to be fact-based research that demonstrates additional regulation will not adversely affect the business community or place undue regulatory burdens on our nation's small business owners and entrepreneurs.

Small business owners and entrepreneurs are the lifeblood of our economy and the engines of job creation. In 2007, nearly two-thirds of new jobs were generated by businesses between one and five years old according to a study from The New Democratic Leadership Council. Additionally, the same study found that over 50 percent of those new

jobs were also created by small businesses with less than fifty employees. It is an economic imperative to equip these entrepreneurs with technological skills and tools, which can help grow their businesses.

Fulfilling the broadband needs of our nation and translating the recommendations outlined in the National Broadband Plan should be the Commission's first and foremost priority. We urge the Commission to put the Open Internet proceeding on hold until all have access to the benefits of broadband.

Respectfully submitted,

Justin G. Nelson
Co-Founder & President

Chance Mitchell
Co-Founder & CEO