

Here in the state of Utah, we have UTOPIA (<http://www.utopianet.org/why-utopia>), a consortium of cities with the common goal of providing broadband service over fiber. The organization was started over the failure of the local Internet access providers to match speeds in larger cities. Many city governments had approached their respective ISPs only to be greeted by a lack of interest in upgrading services on the part of the ISPs.

One thing that has not been discussed with very much interest in the major media, at least here in the states, is the inherent conflict of interest presented by companies that sell content and Internet access. Comcast is a prime example of a company that can never get around the conflict of their desire to sell content while selling access to the rest of the Internet.

To put it simply, the content providers must be separated from the access providers to remove the conflict of interest. The conflict of interest is manifest in "network management" policies. When a carrier offers content to their own users, they tend to "balkanize" the Internet, segregating it into a private network for the sole purpose of generating envy, exclusion and diversion of resources.

A simple way to achieve the objective of the open Internet is re-classify all Internet Access Providers as common carriers. This power may already be available by reclassifying ISPs under current statutory authority.

The main thing I want to convey is that all ISPs must be classified as common carriers so that they can no longer discriminate against traffic, nor will they have the incentive to do so. If they want to sell content, they're going to have to spin off their carrier business.

I hope you find this comment useful and helpful and that you consider it in your deliberations on how best to serve America with world-class internet access.

Thank you.

Scott