



Consumer Federation of America

October 10, 2010
Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Preserving the Open Internet*, GN Docket No. 09-191;
Framework for Broadband Internet Service, GN Docket No. 10-127

Dear Ms. Dortch:

Mark Cooper, Director of Research of the Consumer Federation of America met with Edward P. Lazarus, Chief of Staff, and John Flynn, Senior Counsel for Transactions, to discuss the need for the Commission to write an order in the above captioned proceeding that establishes the clear authority of the Commission to implement the goals of the Communications Act specified in Title II including, nondiscrimination, universal service, access for people with disabilities, consumer protection and public safety.

He stressed the need to outline principles that would be used to determine whether network management practices are “reasonable,” urging the Commission to adopt an approach that required any “management” of services be based on the demonstration of a genuine need to achieve a public interest purpose (e.g. reduce congestion) with the least impact on the core, end-to-end principle of Internet connectivity, as well as the other public interest principles of the Communications Act.

He pointed out that the discrimination that AT&T wants to introduce into broadband Internet access service is radically different from the differentiation of services allowed under Title II of the Communications Act and that stating clear principles of “reasonable network management” is critically important “to preserve the vibrant and competitive” Internet.

Sincerely,

Mark Cooper
Director of Research
Consumer Federation of America