

December 6, 2010

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: GN Docket No. 09-191

Dear Ms. Dortch:

On December 6, 2010, I met with Austin Schlick, General Counsel, Peter Karanjia, Deputy General Counsel, and Zack Katz, Legal Adviser to Chairman Genachowski, with regard to the above captioned proceeding.

We discussed theories of legal authority for the proposed rules to preserve an open Internet. PK expressed the opinion that Title II would provide a firmer foundation for such rules. However, if the Commission insists on proceeding under Title I, it should proceed under the strongest theory possible.

In accordance with Section 1.1206(b), this letter is being filed with your office. If you have any further questions, please contact me at (202) 861-0020.

Respectfully submitted,

/s/Harold Feld
Legal Director

cc:

Austin Schlick
Peter Karanjia
Zach Katz