



Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 14-28, Comment Sought on Open Internet Remand

Dear Ms. Dortch:

On April 8, 2014, Harold Feld, Senior Vice President, Michael Weinberg, Vice President, and Clarissa Ramon, Government Affairs & Outreach Associate, met with Rebakah Goodhart from Commissioner Clyburn's office and Priscilla Argeris with Commissioner Rosenwerfel's office respectively.

Public Knowledge met to discuss the Open Internet proceeding. Public Knowledge recently submitted comments with Common Cause in the Open Internet Remand docket, calling on the FCC to adopt Title II regulatory framework for broadband. Public Knowledge advises the FCC to develop a light-touch regulatory framework to protect an open internet.

First and foremost, Public Knowledge urged the Commission to act quickly to implement robust new open internet rules, rule grounded in legal authority that can withstand the inevitable court challenge. Until such rules are imposed, consumers are not protected from the harms identified in the Commission's Open Internet Order.

Although the DC Circuit recognized Section 706 as a potential avenue for regulation, Public Knowledge advised the FCC that the record regarding this option should be refreshed. Public Knowledge staff stated that the FCC should simultaneously refresh the record on Title II in order to begin the process of re-establishing open internet rules.

In addition to refreshing the record on Section 706 and Title II authority over broadband, the FCC needs to develop a record on peering, interconnection and wholesale access. These are some of the immediate next-step recommendations provided by Public Knowledge staff in order to maintain an open internet.

Finally, and regardless of how the Commission handles the larger question of classifying consumer broadband internet access services, Public Knowledge discussed the proper regulatory classification of services offered by ISPs to edge service providers. Specifically, Public Knowledge suggested that such services fall well within the



Public Knowledge

definition of a Title II telecommunications service and should be classified accordingly by the Commission.

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

Respectfully submitted,

/s/ Clarissa Ramon
*Government Affairs &
Outreach Associate*
PUBLIC KNOWLEDGE

CC: Priscilla Argeris
Rebakah Goodhart