

Hello,

My name is Andrew Pietila. I am the 'Chief Everything Officer' for Star As A Service LLC, a duly registered LLC in the State of Minnesota. Star As A Service LLC, hereinafter known as 'SaaS', is an up and coming hosting services provider dedicated to providing optimal solutions to our clients.

Forgive me if I do not know the specifics of classification of various statutes, legal definitions, et cetera. My primary knowledge focus in terms of my business is that of the action side, rather than the legal side.

I do, however, understand the mindset of companies such as Comcast, Time Warner Cable, Cox, Cogent, CenturyLink, and a few others who escape my mind.

I feel the solution to the whole Network Neutrality debate is a twofold solution, as is the debate on how to bring America's internet quality to that of other places such as South Korea and Europe. I feel it will take certain actions from the FCC, however some Legislative action is also required.

On the side of the FCC, what needs to happen is Internet Service Providers, hereinafter 'ISPs', need to be returned to Title II Common Carrier status. With this, 'Peering' needs to be set as royalty-free (with conditions), and 'Transit' needs to be set to a reasonable (as determined by an independent group, such as the FCC) price.

By Peering, I mean 'Accessing parties that pay for transit from the ISP in question'. This needs to be royalty-free with certain restrictions. Persons wishing to enter a Peering agreement must be willing to pay for infrastructure to connect to ISP's network. This may be accomplished by paying the target ISP to build out a line to the requesting party's location. It may also be accomplished by the requesting party paying to build out the infrastructure themselves, including cross-connect fees in the datacenters they're both in. They must also follow all widespread-accepted standards for internet traffic, such as IP, the packet format for interconnection, et cetera. In return, ISP must not limit the ability to connect, in terms of ports provided.

By Transit, I mean 'Accessing parties that have a Peering agreement with the ISP in question'. This may be a royalty-inducing operation, however an ISP may not refuse this connection so long as fees payed are considered reasonable. The target ISP must not limit the ability to connect, so long as widespread standards are followed and all reasonable fees are paid.

Customers of an ISP's standard plans, such as the 'Performance' plan from Comcast, must be considered transit customers.

ISP's must also fulfill another requirement. They must not allow internal congestion on their networks to cause delays of a significant portion. I think this number should be 200ms round trip time for a 3000 mile distance within the United States. They also must not allow congestion to reach the point that clients cannot use the full speed paid for by their connection.

On the legislative side of things, I think a novel idea should be implemented. I think there needs to be a newly defined bandwidth definition, 'Ultra-broad band', defined as 250,000,000 bits per second (250 megabits per second). With this definition, I think that there should be a transferrable tax credit given to ISP's that bring customers this standard speed to residential customers for a price of \$50 per month or less, with no monthly cumulative bandwidth maximum.

Another item for the legislative side of things is to force deregulation of the creation of new Internet Service Providers. Cities must not be allowed to reject a business's wish to build out infrastructure to serve customers.

With these new rules in place, America can finally be brought into the modern age of

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Internet connectivity. I urgently urge you to consider and implement these rules.

Andrew Pietila
Chief Everything Officer
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