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July 15, 2014

Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Via electronic mail

Re: Croatan Institute Public Comment to FCC Proceeding 14-28, “Protecting and Promoting the Open Internet”

To Whom It May Concern:

I am writing on behalf of Croatan Institute to provide comments on FCC Proceeding 14-28, “Protecting and Promoting the Open Internet.” Croatan Institute is an independent, nonprofit institute for advanced social and environmental research, based in the research triangle of North Carolina. We view net neutrality as critical for keeping all Internet companies on a fair playing field. As an organization that works closely with rural communities to support resilient forms of community economic development, Croatan Institute is particularly concerned that the Internet remain open so that disadvantaged rural communities are guaranteed equal access to the services provided by broadband Internet connectivity.

If Internet Service Providers (ISPs) can increase Internet speeds for companies with the resources to pay a higher premium over their competitors, the remaining smaller companies and start-up ventures will be left at a distinct disadvantage. This would also allow ISPs to pick and choose the companies they want to succeed on the Internet. Increasingly, communication happens over Internet channels, and the Internet has become a vital public service. To that end, the Federal Communications Commission should regulate ISPs as they would telephone service providers, as common carriers or public utilities. Private ISPs should not be left to determine the future of public Internet access.

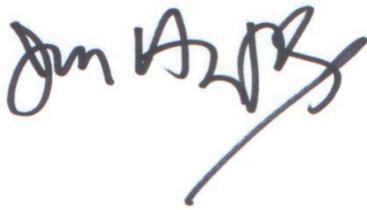
This ruling has major implications for the many rural economies that Croatan Institute supports through its work, including those in Appalachia, the Deep South, and the Southwest. We are actively working with numerous organizations in rural communities around the country, providing technical assistance and helping them to build more resilient communities through strategies of social entrepreneurship, sustainable development, and local wealth creation. Open Internet access is fundamental to the work we do with organizations in these rural settings. Many of these communities are only beginning to increase their use of Internet to promote their businesses

and to improve their livelihoods. Currently, 14.5 million people who live in rural areas in the US lack Internet access, yet opportunities abound for breaking down barriers to economic opportunity, affordable healthcare, and more sustainable and creative forms of rural development. However, the proposed rules would unfairly allow Internet providers to redline rural businesses, towns and customers altogether, while jeopardizing the ability of entrepreneurs and organizations in rural communities to use low-cost innovative online solutions to raise capital, through crowdfunding sites for example, to deliver telemedicine, and to connect local producers to wider sources of demand. There is bipartisan support for expanded Internet access in rural communities, and the FCC should provide a supportive regulatory environment to hasten this expansion in egalitarian ways.

To stop the potential for discrimination against rural communities, the FCC needs to reclassify Internet service as a Title II telecommunications service and to ensure that rural populations have access to the full range of possibilities that the Internet opens to them.

Thank you for the opportunity to comment on this important proceeding. We would be happy to elaborate on this comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua Humphreys". The signature is stylized and cursive, with a long, sweeping underline that extends to the right.

Joshua Humphreys, Ph.D.
President and Senior Fellow