



**CHICAGOLAND BLACK
CHAMBER OF COMMERCE, INC**

**DEDICATED TO ECONOMIC INDEPENDENCE
“LEAVE NO BUSINESS BEHIND”**

July 17, 2014

Dear Members of the Federal Communications Commission:

The Chicagoland Black Chamber of Commerce, Inc is the premier organization that encourages and advocates for advanced leadership and economic development opportunities for Black Business-Owners throughout the Chicagoland area. Since a major component of our mission is to promote the economic development of Black-owned businesses at the national , state and local levels, we urge the FCC to resist calls to regulate the broadband Internet under outdated and burdensome regulations from the monopoly telephone era under Title II of the Communications Act.

It is the Chamber’s position that reclassifying broadband Internet access from a Title I information service to a Title II status would be a major step backward for minority entrepreneurship and black business owners. The rapid build out of our nation’s broadband networks under Title I has been a boon to black business people, allowing them to catalyze economic opportunity in their communities, create wealth and jobs for minority youth, and set the proper environment for enhancing innovation at all levels. We’ve seen first-hand how widely available broadband networks have promoted STEM (science, technology, engineering and math) education in neighborhoods where talented youth would otherwise be shut out of these opportunities. We’ve also witnessed how broadband access provides unique opportunities to minority communities in the areas of telehealth, distance learning and training in entrepreneurship.

Applying Title II regulations crafted for copper-wire telephony companies to complex and dynamic broadband Internet services could prove to be a barrier to further adoption of high-speed information services and Web tools in minority communities. Simply put, Title II regulations would not allow, we believe, for further needed development and technological evolution of the nation’s broadband networks and services. Broadband Internet access has been a great leveler of disparities in wealth and income inequality. And, while we have much more work to do in these areas, we fear that hobbling broadband access with regulations better suited to public utilities would slow these much needed gains.

According to a January 2014 report from the Pew Research Center, the black/white “digital divide” continues to persist, but is not consistent across technology platforms or demographic groups. According to the report, “today, African Americans trail whites by seven percentage points when it comes to overall internet use (87% of whites and 80% of blacks are internet

users), and by twelve percentage points when it comes to home broadband adoption (74% of whites and 62% of blacks have some sort of broadband connection at home).”

And there is also much to celebrate in the Pew findings. “Young, college-educated, and higher-income African Americans are just as likely as their white counterparts to use the internet and to have broadband service at home,” according to the “African Americans and Technology Use” report. Significantly, it added that “some 86% of African Americans ages 18-29 are home broadband adopters, as are 88% of black college graduates and 91% of African Americans with an annual household income of \$75,000 or more per year. These figures are all well above the national average for broadband adoption, and are identical to whites of similar ages, incomes, and education levels.”

If we are to sustain these tremendous gains, and close the wealth and societal gaps that persist in America, we must all work for an Open Internet. By that we mean a broadband networks that continue to attract the tremendous capital investments necessary to keep them competitive in a global economy.

Under Title I, the broadband industry has grown at a tremendous clip and now helps support nearly 11 million jobs in the United States. Since their inception, these networks have attracted hundreds of billions of dollars in private investment capital to wired and wireless broadband networks. Annually, some \$60 billion is invested into cable, fiber, fixed and mobile wireless, phone, and satellite broadband networks. If this level of investment is to continue, we need a stable and predictable regulatory environment. Reclassification under Title II would burden broadband networks with needless compliance and reporting requirements and signal investors that the era of agile broadband expansion is nearing a close.

The Chicagoland Black Chamber of Commerce asks the FCC to continue to oversee the nation’s broadband networks under Title I. That is our best hope to further expand access to minority communities, to promote economic opportunity and competition, and ensure that new and innovative technologies are readily accessible to all Americans.

Very truly yours,

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