

To:

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street SW,
Washington, DC 20554

From:

Ismail Jadun
Community Manager
reddit, Inc

Docket number: 14-28

Dear Chairman Wheeler,

Please accept the attached comment filing from reddit, Inc in support of net neutrality and an Open Internet.

We stand for net neutrality and we ask you to stand with us.

Inside this package, there are additional comments from our online community on how the internet and your Proposal will affect the personal and professional lives of members of our community.

Thank you for your kind attention to this matter,

Ismail Jadun,
Community Manager

Before the
Federal Communications Commission

In the Matter of

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Protecting and Promoting the
Open Internet

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GN Docket 14-28

Comments of reddit, Inc.

July 15, 2014

Erik Martin
General Manager

Ismail Jadun
International Community Manager
REDDIT

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Executive Summary

reddit, Inc., widely described as the “front page of the Internet,” is a San Francisco-based Internet company founded nine years ago that has become the world's largest online community discussion platform. Even though we only have 62 employees, we are a top-50 website and have 100 million unique monthly visitors spread over 7,000 active communities. For comparison, the top newspaper website in the US, *NYTimes.com*, has 31 million unique monthly visitors. Our global platform helps facilitate cultural exchanges and connections for people in over 190 countries.

We at reddit support efforts to maintain a truly open Internet. We believe that FCC Chairman Tom Wheeler’s proposal threatens it. The proposal would change the Internet—even though the Internet is not broken. To quote the FCC’s 2005 Policy Statement, throughout the Internet’s history, access to the Internet has been granted “in a neutral manner.” ISPs did not block sites; they did not engage in “technical discrimination,” treating traffic from some sites or applications better than others based on the class of the application; and they did not offer “paid prioritization”—fast lanes for those willing to pay extra. Up until this year, the FCC guaranteed these aspects of neutrality in policy.

The Chairman’s proposal would change that. Though it would forbid blocking, it would permit technical discrimination and paid prioritization. It would also permit ISPs to negotiate *exclusive deals* with websites and appmakers in certain sectors, offering them and only them access to the fast lane, while relegating all of their competition to the slow lane. Finally, it has loopholes permitting access fees and discrimination through interconnection and mobile access.

The Chairman’s proposal would force owners of websites and applications to negotiate individual deals with cable and phone companies across the U.S. The terms of the deals: sites or appmakers pay ISPs to make sure their users—who are *already* paying those cable and phone companies for capacity to access the Internet—can use their site or application without being buffered to death. That’s unfair to the users and the entrepreneurs who have made the

Internet the place it is today. The Chairman's proposal also creates perverse incentives. It's a road map for cable and phone companies to disinvest from their networks, to create congested slow lanes harming their users and most websites and applications just to extract some extra money from the few large companies who can pay to avoid the congestion.

If the de facto net neutrality rules in the previous decade were not in place, the reddit platform might not exist. If the Chairman's proposal is enacted today, our operations might have to be curtailed drastically. We call upon the FCC to enact bright-line rules which prohibit blocking, technical discrimination, and paid prioritization, for both fixed and mobile. Doing that requires classifying broadband providers under Title II of the Communications Act with appropriate forbearance.¹

I. Reddit is the Front Page of the Internet

reddit has developed into a community—really, a collection of communities—dedicated to common interests and causes. It is one of the Internet's great resources for curious minds, displaying a vast amount of information on almost any conceivable topic, and inviting users to contribute their own knowledge and beliefs.

One of our most popular communities on reddit is called /r/IAmA in which participants ask redditors to "AMA" or "ask me anything". It's an informal interview format created by reddit users that allows people with a story to field questions and have an authentic and informal conversation with people from all over the world. Political & cultural icons like President Obama, Bill Gates, Arnold Schwarzenegger, Buzz Aldrin and even an astronaut on the ISS have taken part in an AMA on our platform to communicate and engage with a generation that grew on the Internet and the World Wide Web that runs on it.

It is also a platform for organizing collective efforts. To list just a few:

¹ <https://www.eff.org/deeplinks/2014/07/forbearance-what-it-why-its-essential-net-neutrality-0>

In 2010, redditors raised over \$560,000 for DonorsChoose—a charity to donate much-needed classroom supplies to schools all over the the United States—as part of Operation Truthy Classroom to convince Stephen Colbert to hold a rally to restore sanity. The rally that was later announced by Stephen Colbert & Jon Stewart had over two hundred thousand of people attend, which was vastly more than the organizers anticipated.^{2 3}

reddit was the first website that announced it would blackout on January 18, 2012 in protest of the Stop Online Piracy Act (SOPA) and PROTECT IP Act (PIPA).⁴ Also, when GoDaddy.com (a domain-hosting company) publicly supported the bill, one redditor led a collection of redditors to boycott GoDaddy. The post was titled, “GoDaddy supports SOPA, I'm transferring 51 domains & suggesting a move your domain day.”⁵ Enough redditors saw the post and transferred their own domains that within 24 hours GoDaddy publicly withdrew its support of the bill.⁶

II. The FCC Chairman’s Proposal Threatens reddit Today

We are not Facebook, valued at over \$100 billion;⁷ we are not Google, valued at nearly \$400 billion.⁸ As incredible as it may seem, despite reddit’s popularity and importance to Internet culture, we do not have huge profits. In large part, that is due to the fact that reddit is especially concerned with promoting the goals of our community. reddit is the town square for the internet. First, we impose strict rules on the type of ads permitted on reddit’s message boards: ads cannot be flashy or spammy. Though these ads would be the most profitable for us,

² http://voices.washingtonpost.com/blog-post/2010/09/rally_to_restore_sanity_to_mee.html;
http://www.reddit.com/r/ColbertRally/comments/dxybq/500000_half_a_million_dollars_holy_crap/

³

⁴ <http://www.theverge.com/2012/1/18/2715300/sopa-blackout-wikipedia-reddit-mozilla-google-protest>.

⁵

http://www.reddit.com/r/politics/comments/nmnie/godaddy_supports_sopa_im_transferring_51_domains.

⁶ <http://arstechnica.com/tech-policy/2011/12/godaddy-faces-december-29-boycott-over-sopa-support/>

⁷ http://ycharts.com/companies/FB/market_cap.

⁸ http://ycharts.com/companies/GOOG/market_cap.

they are also the most invasive for our users. Second, we have voluntarily “decimated”⁹ our ad revenues: we have pledged to donate 10% of all our ad revenues in 2014 to non-profits nominated and voted upon by our users.

If the Chairman’s proposal becomes law, we will face a series of hard choices. Our current situation is precarious: who wouldn’t want to be the front page of the Internet? Many current players, some of them big (such as the *New York Times*, *Buzzfeed*) and others titanic (such as Facebook and Google) would love to take our place. They have *significantly* more money than we do. Google, for example, posted profits of \$3.45 billion last quarter.¹⁰ Our competitors have the ability and the will to seize any advantage they can. If there is a fast lane, they will be in it.

Even if the slow lane is, absolutely speaking, pretty fast, so long as it is *slower* than the fast lane, people will be deterred from using reddit. It’s well-documented that seemingly-inconsequential differences in loading times deter users; users visit a website less often if it loads 250 milliseconds slower than a competitor’s.¹¹ In the Internet permitted by the Chairman’s proposal, users will be used to the fast lane, and reddit will look like dial-up compared to Google’s DSL.

To stay competitive, we would have to pay for priority access—negotiating a deal with each individual ISP. We might not be able to afford that. Maybe we could. But even if we could, we would have to come up with the money for it somewhere. To repeat: we don’t have piles of cash lying around our HQ. We would have to purchase priority access with some cutback to our community. Maybe we’d have to run jarring, flashy, spammy ads. Almost certainly, we wouldn’t be able to give 10% of our revenues to charities. We’d have to hire more business developers and lawyers, and fewer engineers. We’d have to hire fewer people in total.

⁹ We mean “decimate” in its original sense: to take a tenth from the whole. See:

<http://www.redditblog.com/2014/02/decimating-our-ads-revenue.html>.

¹⁰ http://investor.google.com/earnings/2014/Q1_google_earnings.html.

¹¹ <http://www.nytimes.com/2012/03/01/technology/impatient-web-users-flee-slow-loading-sites.html?pagewanted=all>.

As bad as that scenario would be, it's actually the best-case scenario for us under the Chairman's proposal. The Chairman's proposal permits ISPs to negotiate *exclusive deals* with edge providers, guaranteeing them the sole right to a fast lane within a certain sector. There is no way that we could afford *that*. We simply cannot outbid our competitors. They, however, can outbid us.

We have a great site; our millions of users recognize that. They've shown us great loyalty, and we hope they will continue to do so even if we're consigned to a slow lane. But we're also realistic. If our site loads more choppily, slowly, or inconsistently than those of our competitors, many of our users will move. We also will be less able to recruit new users. We won't be the front page of the Internet anymore.

III. We Need Bright-Line Rules, not a Vague “Commercial Reasonableness” Standard

The FCC proposes to protect us with a vague standard: ISPs can discriminate, but they cannot impose policies which are “commercially unreasonable.” We can't defend ourselves with that.

We have no lawyers on staff, and we devote our resources solely to meeting the needs of our 100 million visitors. We do not have the resources to engage ISPs in a legal fight, with only a vague standard as our weapon, without any firm ground on which to stand. We need clear, bright-line rules.

We doubt that Section 706 of the Communications Act will permit the FCC to enact these rules. If the FCC does not invoke Title II of the Communications Act, it cannot treat broadband providers as common carriers.¹² As the DC Court of Appeals held in *Verizon v FCC*, “We think it obvious that the Commission would violate the Communications Act were it to

¹² <https://www.eff.org/deeplinks/2014/06/fcc-and-net-neutrality-way-forward>;
<http://cyberlaw.stanford.edu/blog/2014/05/net-neutrality%E2%80%99s-legal-binary-either-or-no-%E2%80%9Cthird-way%E2%80%9D>.

regulate broadband providers as common carriers. Given the Commission's still-binding decision to classify broadband providers not as providers of "telecommunications services" [under Title II] but instead as providers of "information services," ... such treatment would run afoul of" the Act. Indeed, *any rule* prohibiting discrimination would involve treating ISPs as common carriers: the FCC would need to leave "substantial room for individualized bargaining and *discrimination in terms.*"

That means the FCC cannot do a bright line rule against discrimination without Title II. Nor can it ban access fees and paid prioritization, as the court already ruled that such a ban leaves "no room at all" (not substantial room) for discrimination. Thus, in order to enact the rules it must, the FCC needs to classify broadband providers (which, as the FCC recognized in 2010, have terminating access monopolies over their users) as "telecommunications services" under Title II of the Communications Act and apply rulings with appropriate forbearance.

IV. The Chairman's Proposal Would Have Threatened reddit Before It Was Even Born

If the Chairman's proposal had been law in 2005, reddit might not have gotten off the ground.

Steve Huffman and Alexis Ohanian founded reddit in 2005. Huffman and Ohanian were 22 and had just graduated college. The reddit team was just the two of them, working out of an apartment in a Boston suburb.

reddit was in the first batch of startups to receive funding from Y Combinator. Today, Y Combinator is the premier seed accelerator in Silicon Valley: it has a portfolio of over 700 companies valued at over \$20 billion and creating over 3,000 jobs at quickly growing companies. Like many of its startups, Y Combinator was once the crazy idea of one entrepreneur, Paul Graham.

In 2005, Huffman and Ohanian took a train from Charlottesville, VA to Cambridge, MA to see Graham speak at Harvard. Graham and his partners later rejected Huffman and Ohanian's first idea for a startup (a mobilephone food-ordering app)—but Graham wanted to work with Huffman and Ohanian, and suggested they build something in a browser that solved their own problem. The duo was accepted to Y Combinator to create a better way to find out what was new and interesting online, a "front page of the internet." Y Combinator invested a total of \$12,000 and they got to work with little more than a pair of computers and lots of spaghetti.

Stop for a moment and think about that amount. To get a global company off the ground, \$12,000 is a staggeringly small amount of money. One of the reasons the open Internet is so great is that it makes \$12,000 *sufficient* to get a major company off the ground. But \$12,000 would not have been enough to cover ordinary operating expenses *and* put us in a fast lane. Paul Graham and his partners would have been faced with a hard choice: either invest the additional money necessary to put us in the fast lane, or run the risk that reddit might not take off because users were frustrated with the difficulties of accessing it. Perhaps Y Combinator wouldn't have even had that choice: Graham and his partners wouldn't have had the money to start *Y Combinator* if they had to pay for fast lanes for each of their startups.

reddit's history shows that even with a great idea and a great team, it's hard to raise money as a startup. There's a lot of risk involved. If the Chairman's proposal were in effect, our founders would have had to address another, significant concern from potential investors: how are you going to overcome the incumbents' advantage in better Internet access? Under the Chairman's proposal, we would not only have had to raise more money; we also would have had more difficulty raising money, period. Maybe we would have never gotten a dime.

V. Conclusion

We urge the FCC to classify broadband providers under Title II of the Communications Act and to enact bright-line rules which:

1. Ban blocking;
2. Ban technical discrimination;
3. Ban paid prioritization;
4. Ban discriminatory exemptions to bandwidth caps;
5. Mandate ISP transparency; and
6. Apply both to fixed and mobile access pipes to the Internet; and
7. Ensure that last-mile interconnection is not used to get around the above rules.

As a technology company, we favor good solutions. While some of these solutions may be politically difficult, failing to adopt them will be fatal to the wider Internet economy and an existential threat to our company.

On the next page is a word from our community.

Now a word from our community:

We asked members of our community to contribute to these comments.

reddit is a collection of online discussion threads, some composed of only one post, others composed of thousands. These threads are organized into “subreddits” dedicated to specific interests: there’s a subreddit for philosophy, for videos, for science (“/r/askscience”), for women’s issues (“/r/twoXchromosomes”), for citizen reporters (“/r/UkrainianConflict”), and many, many others. Threads are voted up and down by members, making them more or less prominent within the subreddit and the reddit platform itself.

Here are a just couple more things our amazing reddit community has done independently: In 2010, one redditor posted about a seven-year-old Michigan girl, then in the late stages of Huntington’s Disease, whose neighbors had harassed for her disease. redditors raised money for her to buy toys from a local shop.¹³ In 2012, one redditor posted about an attack at a Kenyan orphanage and asked other redditors to raise the \$2,000 necessary to secure the site with a concrete wall. redditors gave over \$80,000.¹⁴

Particularly, as we might have never been founded without net neutrality, we asked our users how their lives would have been different without reddit. People in our community do amazing things, and we are proud to be a platform for that goodness.

Here are just a few of the many comment from our redditors.

They tell us the stories and experiences
that would have never happened if reddit didn’t exist.

[You can read more at <http://redd.it/2aojle>]

¹³http://www.washingtonpost.com/blogs/worldviews/post/huntingtons-disease-kills-nine-year-old-kathleen-edward-bullied-girl-video/2012/01/13/gIQAXRg1wP_blog.html

¹⁴ http://www.huffingtonpost.com/2012/01/27/reddit-donates-kenya-orphanage_n_1237016.html

from our user *mverlei*

I am a teacher, and as a member of Reddit, I've had the opportunity to consult with educators through /r/teachers. I have been able to share triumphs, blow off steam, and most importantly, share pedagogical ideas and insights with a pool of professionals outside my school, district, state and even country. That connectivity grants me discourse. Discourse grants me perspective. Ultimately, because of Reddit, my students (and I'm sure many others) receive a curriculum grown through collaboration and reflection and by proxy one that is critical and multicultural. I know I'm biased, but I can't think of anything more important than providing meaningful education to the youth of America, and the community in /r/teachers is a resource for educators committed to that goal.

by our user *UsedPickle*

Places like Reddit give me the opportunity to discover new things I may have not stumbled across on my own. People tend to gravitate towards ideas and people that are the most like them. Reddit, however, almost forces me to not only have an active dialogue, but to gain a broader understanding of a topic. Reddit is the new town square, limiting access hurts the internet citizenry.

by our user *redtaboo*

reddit is filled with real people with real problems finding solutions from other real people everyday. You can find stunning acts of empathy and kindness every single day without digging too far.

reddit has subreddits where scared LGBT kids can go and talk to other LGBT people about their lives. With their help they can learn how to make their lives better and where to get help when things look dark.

reddit has communities where someone who feels suicidal can talk to people that care and gather the strength to carry on.

reddit has communities where women that find themselves pregnant can talk to people about all of their options and find the resources needed to make an informed decision about their future.

reddit has communities where people trapped in domestic violence situations can talk to others that have gotten out. They can find the resources they need anonymously and safely and hopefully find the strength to get out.

reddit has communities where someone that's down on their luck can find someone willing to buy them a pizza so they can eat tonight, or more.

reddit has a ton of communities dedicated to helping with addiction. From drugs to drinking to cigarettes and more. People can get support from others across the globe going through the same thing they are.

Without the open internet some (many?) of these things may not be possible. reddit has allowed, through their own openness, these communities to build up and come together to do grand things on what feels like a small level.

People from all over the world talking to each other, learning about each other, and helping each other. reddit has over 7 thousand active communities. There is a place for everyone and everything, the openness of the internet and reddit is what drives them all.

by our user *pseudoentity*

I owe my strength in my almost one year sobriety to the /r/stopdrinking support subreddit. I don't want to know an internet that can be manipulated to close the gates that change people's lives for the better forever.

by our user *AngelRicky*

I am student at a major research institution

My work requires me to use open source software, linux, all kinds of things that have helped not only in my work, but have broadened my horizon to other opportunities. Access to open source software

and ideas has improved me intellectually and mentally as I learn ideas, thoughts, and philosophies from all parts of the Earth.

In my free time, I help organize e-sports (League of Legends, Starcraft 2, DOTA 2, etc) events at my school. I have met many great people and been given great opportunities from this.

Net neutrality is crucial for all of these, not just because of the associated subreddits. Curbing the trade of ideas will significantly impede on the spread and development of scientific knowledge and philosophy.

by our user *btwdani*

Sometimes I have a crappy day at work. Sometimes a friend makes an offhand comment that actually hurts my feelings. Sometimes my significant other is being cranky and not cuddly. Well, when these things happen I can always head on over to Reddit and fill my eyes with some /r/Aww to boost my spirits. Perhaps some /r/ShowerThoughts to stimulate a discussion with my roommates at 4 a.m. while eating raw cookie dough. Even some /r/Bestof can help turn my day around, as I see the highs and lows of the Redditors that came before me. No matter how my day goes, I know my subreddits are always waiting for me at the end of it.

by our user *allthefoxes*

Reddit has saved my life.

I am not so well off in life, unfortunately. I live paycheck to paycheck. I'm a student struggling to get a degree in something I am passionate about. I suffer from severe clinical depression among a few other things. I have attempted suicide in the past, and recently. Every day for me is a struggle, emotionally and financially.

I have been able to meet some really amazing people here on reddit. People who have been there for me, people who have shown me great things, and people who have simply been friends when I needed that.

I don't think I would be alive if not for the people I have met on reddit. Reddit is not just a website. Reddit is a community, and an amazing one. I'm not the only one, there are many others out there. Reddit has saved my life. The people, the community, and sometimes even the content. I support an open internet. Without it, I do not think I would be around anymore.

by our user *astronautbaron*

I've always been interested in learning Italian, but I could never justify the cost of a product like Rosetta Stone. I came on Reddit to discover /r/languagelearning which provided a plethora of free resources and diverse people. It was there I was able to start my journey. Also on that subreddit, I was also able to find the free website Duolingo, which gave me the drive and tools needed to learn Italian. Again, all free. If fast lanes are able to be a reality, companies that have the cash can and will push sites like Reddit and Duolingo away from knowledge seekers.

This place has expanded my mind and my heart, and for that I will always be grateful.

Grazie.

by our user *Unidan*

The ability to share and exchange ideas is crucial to the internet. By putting limitations on some user's abilities to connect and interact with one another in the same way, you're directly limiting the exchange of ideas which has made the internet so successful in the first place.

As a scientist, there is a growing trend now for publications to be put into what is known as "open source" catalogs, meaning that there is no journal subscription necessary to read them. The journal PLOS ONE is currently one of the most notable journals that follows this format, and many institutions

are putting their collections up for everyone to read, as well. This unrestricted access to information has begun to level the playing field, opening up opportunities for learning and research for those who don't have the means to purchase individual subscriptions. In doing so, science has become more inclusive, allowing a greater swathe of potentially great minds and ideas to enter the arena.

To me, limiting the internet is reverse thinking. Without uninhibited access, I would not have been able to interact with the same large group of individuals on my own projects, and would have missed the opportunities that have been afforded to me. Without equal access to sites like Reddit, I would not have been able to forge the unique connections that have allowed me to start and crowdsource scientific projects *solely* over the internet, nor would I have been able to receive the full feedback that has been integral to its continuation.

When you start discriminating data, you are *changing* data. That change introduces biases, which alter the fundamental truth of the matter. With things like science, restricting access to the full picture, be it through limiting the quality, type or access to it, is nothing but a degradation.

by our user *Flowhard*

Reddit is awesome, and has helped me in a bunch of ways - for example, I want to stay competitive in the job market, so having accessible, user-curated content in subreddits like /r/learnprogramming or /r/entrepreneur or /r/smallbusiness has been an unbelievably helpful resource. I don't know where else I would have found all the helpful articles I did, or other helpful people to boot!

by our user *sadonion22*

As a person born in 1992, I can't imagine my life without the internet. And not because I need to look at cat pictures or play video games (though I do enjoy both those things), but because it's a constant source of information for me. As a University of Chicago undergrad, I'm constantly researching topics related to my classes - wikipedia'ing some obscure French fight, looking for videos on how microRNA's work, and reading through online editions of books. Outside of the classroom I continue this spirit of exploration, participating in online discussions, and teaching myself new things. And of course there's reddit - a site which has forever changed the way I think, because I'm able to read through the lives of other people and the life lessons they've gained. Multiple times now my view has been changed entirely based on what somewhat wrote in a comment on r/depthhub. The internet is so much more than a meme generator or a place to post silly pictures - it's a fundamentally new way of gathering and sharing information.

For the sake of my generation and generations to come, please do not ruin this grand experiment. The countries that will be leading in 50 years are those with the most respect for education and knowledge - and the internet is fundamental for any country that wants to succeed in those two areas.

Thank you for time, Trevor

by our user *jordanlund*

My perspective is a little unique because I've been on the Internet since before the www existed.

I started in 1988 with Unix shell accounts. Back then all we really had were Email, FTP, Gopher, Usenet, IRC, things like that.

I watched HTML and the *www* blossom out of that and become what most people consider these days to be "THE" Internet.

The problem is, if Net Neutrality fails, whatever the next big innovation is won't be allowed to start.

The powers that be will compartmentalize and marginalize it until it has no visibility.

Forget website A being slower than website B.

How about the next big protocol like HTTP never being allowed to exist? What if, back in the day, the people who were running FTP servers went "I don't know about this whole http thing, let's spike it now while we can..."

You wouldn't be using what you now consider to be "THE" Internet.

and we'll leave you this poem by our user *Poem_for_your_sprog*

'Without this fine, fantastic site
To surf and spend my time -
I never would have thought to write
A verse or two in rhyme.

*I know that's pretty tame and small,
And trifling as can be -
It might not sound that much at all...
But it's a lot to me.'*