

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

In the Matter of )  
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Protecting and Promoting the Open Internet ) GN Docket No. 14-28  
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**COMMENTS OF THE CITY OF PHILADELPHIA**

The City of Philadelphia (“City”) respectfully submits these Comments in response to the Federal Communications Commission’s (“FCC”) April 7, 2011 Notice of Proposed Rulemaking in the above-entitled proceeding (“NPRM”).<sup>1</sup>

The City supports and seconds the joint comments of the National League of Cities (“NLC”) and the National Association of Telecommunications Officers and Advisors (“NATOA”) submitted in response to the NPRM. The nation’s fifth largest city is home to over 1.5 million residents and a diverse business community, including a thriving community of entrepreneurs who rely on an open Internet affording the same level of access to all businesses in order to compete effectively in the delivery of innovative products and services – data-intensive analysis, real-time information, high definition video, and the many high bandwidth applications that drive innovation. Philadelphia’s “information economy” has developed rapidly in the last decade, becoming a major source of growth in small businesses and startups, and the well-paying jobs they can bring. Network barriers limiting high speed access to those who can pay a

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<sup>1</sup> In the Matter of Protecting and Promoting the Open Internet, GN Docket No. 14-28, *Notice of Proposed Rulemaking* (rel. May 15, 2014) (*NPRM*).

premium for it will disadvantage these new enterprises and stifle an important engine for the City's economic growth. This will limit the City in competing successfully in an increasingly global and information-driven marketplace. Philadelphia, like many older cities still transitioning from an industrial economy, depends heavily on growth in its technology sector, and that growth cannot continue without unrestricted, competitive access to the Internet.

An open Internet fosters civic engagement, delivers new opportunities in education and the arts, and creates the kind of high-quality environment that attracts and keeps a talented, engaged workforce. The City is making significant investments in web-based delivery of government services, connecting citizens with City departments and increasing the efficiency with which they deliver essential services. These and many similar efforts around the country depend on high-capacity Internet access for City departments and the citizens who use them. They cannot succeed without free and open access to the Internet.

The City supports the longstanding FCC commitment to “protect and promote the Internet as an open platform for innovation, competition, economic growth, and free expression.”<sup>2</sup> The City agrees with NLC and NATOA that an “open Internet brings to communities both a stronger economy and a stronger democracy.”<sup>3</sup> As stated in their comments: “[N]on-discrimination and openness are not new concepts. Rather, they represent established and successful policies without which today's Internet would not have been possible. ... The Internet's success arose because anyone could communicate with other network endpoints, unfettered by any unnecessary mediation from the network owner and ‘without change in the form or content of the information as sent and received.’”<sup>4</sup>

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<sup>2</sup> *Id.* at ¶ 11.

<sup>3</sup> NLC and NATOA Comments at 2.

<sup>4</sup> *Id.* at page 3.

For the foregoing reasons, the City urges the FCC to work with all stakeholders in this proceeding to establish rules and policies that will ensure an open Internet.

Respectfully submitted,  
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