

Communications  
Workers of America  
AFL-CIO, CLC

501 Third Street, N.W.  
Washington, D.C. 20001-2797  
202/434-1100

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July 18, 2014

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

**Ex Parte Notice. GN Docket No 14-28. In the Matter of Protecting and Promoting the Open Internet**

CWA sent the attached press release to the FCC Chairman, Commissioners, and staff in the above-captioned proceeding.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Goldman". The signature is written in black ink and is positioned above the typed name and title.

Debbie Goldman  
Telecommunications Policy Director

## **NAACP, CWA Call for ‘Strong, Legally Enforceable Rules’ on Open Internet**

Washington, D.C. -- The Communications Workers of America and the National Association for the Advancement of Colored People support action by the Federal Communications Commission to adopt strong, legally enforceable rules that will safeguard an open Internet.

In comments submitted to the FCC today, CWA and the NAACP said that the Commission’s rule must be “consistent with the need to promote job-creating investment and closing the digital divide.”

Read the full filing [here](http://files.cwa-union.org/national/CWA-NAACP_Open-Internet-Comments_7-15-2014.pdf). [http://files.cwa-union.org/national/CWA-NAACP\_Open-Internet-Comments\_7-15-2014.pdf]

The need to upgrade our communications networks to world-class standards is critical. In the U.S., that expansion depends on private investment to build the next-generation of broadband networks, and that investment results in “far more and typically better paying jobs than the application and content sectors, particularly for people of color,” they said.

That’s why the rules adopted by the FCC to ensure an open Internet also must ensure “that there is sufficient future investment and job creation to propel not only economic opportunity but a permanent bridging of the digital divide.”

That means the Commission must ensure that its open Internet rules provide incentives for investment in truly high-capacity networks that provide everyone with the bandwidth and service quality they need to access the data-rich and video-intensive applications on the Internet. This principle follows the vision laid out by the Commission’s National Broadband Plan. “With enough capacity, people do not have to worry about ‘fast lanes’ or ‘slow lanes’ or the degradation of non-priority service,” they said.

CWA and the NAACP supported the Commission’s 2010 Open Internet rules, and those rules have worked. This year’s action by the D.C. Circuit Court of Appeals vacating the Commission’s “no blocking and anti-discrimination rules” did provide a blueprint for the FCC – based on Section 706 of the Telecommunications Act of 1996 - to move forward with a “commercially reasonable standard” that addresses blocking and discrimination.

“The Commission’s mission now, following that blueprint, is to put its three main rules – full transparency, no blocking and no reasonable discrimination – on sound legal footing, in order to foster continued investment by broadband providers while protecting Internet freedom,” they said.

CWA and the NAACP propose building on the 2010 Open Internet Order to continue to balance the two important policy goals of Internet openness and network/edge provider investment. An analysis of expenditures by 14 of the largest publicly traded network providers and 11 of the largest publicly traded edge providers in the 2011-2014 period (the years after the 2010 *Open Internet Order* took effect) found that network providers’ capital investment at \$193.1 billion far exceeded the capital investment by edge providers of \$36.7 billion.

This investment has a direct impact on jobs. For U.S. workers, and especially African Americans and Hispanics, network providers employ at least three times as many people as edge providers. Almost all the 870,000 employees of the 17 largest network providers are in the U.S., not the case for the 280,000 people employed by the edge providers. African American workers have a larger share of jobs at network companies, from 12-14 percent, compared to holding just 1 to 4 percent of jobs at the four leading edge providers. See attached tables.

*CWA represents 700,000 workers in communications, media, airlines, manufacturing and public service, including more than 300,000 who work in the communications industry.*

*The NAACP is the nation’s oldest and largest civil rights organization, dedicated to fighting for social justice for all Americans.*