

July 17, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Ms. Dortch:

We represent four major national minority-based Chambers of Commerce in the United States:

National Black Chamber of Commerce
National Gay & Lesbian Chamber of Commerce
U. S. Hispanic Chamber of Commerce
U. S. Pan Asian American Chamber of Commerce

We are writing in response to the Federal Communications Commission's Notice of Proposed Rulemaking (?NPRM?), and to support the Commission as it pursues public policy to advance broadband access and adoption, and the development of next generation broadband infrastructure for the benefit of our membership organizations. We urge the Commission to keep Internet as a Title I information service, and avoid reclassification to Title II common carrier service.

While each of our organizations are attuned to the specific needs of our constituents, there are some issues that cut across our cultural and societal differences and encircle us all, like broadband access to the Internet. Broadband has greatly benefited Americans, most especially minorities, by creating a multitude of opportunities for entrepreneurship and expanding the workforce to include those who would otherwise not be included in the economy, including working parents, the disabled, and the retired, and those who may prefer to work from home. Moreover, broadband connects Americans to economic resources in their communities, making it easy for people to search for jobs online, participate in further skills training, and advertise their businesses.

As business organizations we have a responsibility to our members to focus our attention on economic growth. But, in the 21st Century economic growth is often based upon access to education, capital, market data, and mentoring, among other needs. Our mission

is to encourage the adoption of policies that will promote opportunities for job creation and entrepreneurship during these still trying economic times. We believe that

appropriate incentives, not regulations, are needed to stimulate private investment for the expansion of broadband networks.

Prior to the widespread availability and adoption of high-speed access to the Internet, for many groups opportunity was limited in scale and scope to geographic area. For entrepreneurs in smaller cities and towns, opportunity was often impossible to find either because of a racial cultural divide or, in the case of LGBT individuals, isolation based upon their sexual orientation.

As the Internet has grown from a tool for governments and academic institutions, to a hobby that relied upon dial-up modems by 18% of Americans in 1997, to everyday use by nearly 80% of Americans in 2012, much of the minority community has yet to catch up.

Recently, massive investment by the major Internet Service Providers (ISPs) to bring broadband to underserved neighborhoods and to smaller and rural communities has

resulted in expanded broadband network deployment and increased access to high-speed Internet for both businesses and consumers. This has occurred, not because of government pressure (like the need to pass legislation outlawing "redlining" by banks), but because of market forces.

The combination of wired and wireless high speed access allows nearly everyone who wants it to have service, at advertised speeds, and at a fair price. How? Just watch TV for more than 20 minutes at a time and the competition for broadband subscribers becomes abundantly clear. This competition is not by government mandate. It is by the fierce competitive nature of the market.

It is that drive to provide the best service at the best price that has drawn more than \$1.2 trillion in private investment in the Internet since the Telecommunications Act of 1996 was adopted, through 2012, and continuing investments of upwards of \$50 billion per year since then. Much of this investment would be at risk if the FCC treated the Internet, not with the light regulatory touch in place since the Clinton Administration, but as a utility to be controlled, regulated, overseen, and managed from Washington, DC.

These investments, coupled with the desire for diversity, have created 945,000 jobs for Americans of all backgrounds within the wired and other telecom services sectors, according to the Bureau of Labor Statistics, 2013.

Certainly, more can be done to address gaps in broadband access and provide technical assistance in minority communities, but as a result of the substantial investments made

thus far, we have seen growth in minority segments of the population adopting broadband technology, wireless broadband technology and incorporating broadband applications to enhance how they work and live.

For minority-owned businesses, timely access to markets and to suppliers is often the difference between success and failure. Just as social and service clubs have been the central hub of business-building in decades past, the Internet now provides those crucial connections in the 21st century. Our members know best the needs and desires of their constituencies and the Internet allows them to reach out and build relationships, helping each other's businesses grow and prosper.

Chambers of Commerce have traditionally helped businesses form alliances. Utilizing the Internet as an organizing and marketing tool, we can help our members find customers or suppliers and, in many cases, suggest new lines of business because we can quickly scan the market and spot economic voids.

Forcing the Internet into a Title II classification can only make it more difficult for individuals to make the highest and best use of this important tool. Notwithstanding intentions and promises, many of our members have a healthy skepticism when it comes to being treated equally. We have learned to worry about the law of unintended consequences? when an idea or program of the government turns out to cause far more problems than they solve.

The last thing small businesses in America need are more forms to fill out; more regulations to track; and more rules to follow. Part of the American dream is the freedom to pursue dreams. Access to the Internet has been among the most important developments in history especially for the economic progress of minorities.

We have witnessed firsthand the power of broadband networks and services that allow people to innovate and create 21st century jobs. Broadband access will empower businesses economically, socially and politically and facilitate more of their entry into the digital age. As the Commission moves forward it should focus its attention on

7521710559.txt

developing a balanced and efficient policy that incentivizes investment in broadband networks, so that all consumers and businesses can enjoy economic, social, and civic benefits.

The Internet is not just working; it is proving an essential element in the path to economic success for all Americans and for America to remain a leader in this increasingly challenging and seamless global marketplace. Thus, less regulation and more incentives should be the policy.

Sincerely,

Harry Alford, President & CEO, National Black Chamber of Commerce
Justin Nelson, Co-Founder & President, and Chance Mitchell, Co-Founder & CEO,
National Gay & Lesbian Chamber of Commerce
Javier Palomarez, President & CEO, U.S. Hispanic Chamber of Commerce
Susan Allen, President & CEO, U.S. Pan Asian American Chamber of Commerce