

14-28

DOCKET FILE COPY ORIGINAL

Received & Inspected

JUL 14 2014

FCC Mail Room

July 7th, 2014

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: NPRM 14-28

Dear FCC Commissioners:

Thank you for making a period of public commentary available on this important inquiry.

I am a telecom/internet engineer (CCNP, CCNA, MSc (Eng)) with a background in networking and IP. Up to my recent relocation to the US, I have been a Research Fellow in mobile technology at the Department of Management at the London School of Economics and Political Science where I earned my PhD in 2009. I have a wide range of practical and academic experience in mobile technology research, business models analysis, telecommunications strategy, mobile payments, big data and multidisciplinary projects). I have been hired to work on research for the European Union, United Kingdom, and Brazilian governments on a range of digital economy and related engineering topics.

I have studied network neutrality and its implications in various international contexts. While it is important that the FCC looks at issues of competition in the broadband market, net neutrality as it typically envisioned by advocates and policy makers, is predicated on an obsolete layered model of internet architecture where internet service providers in a theoretical position to foreclose content and applications on last mile networks.

My detailed study of the internet in the US and Europe shows that internet networks are no longer characterized by this two-sided market archetype. Today's internet networks are characterized by digital service platforms and modular business models. Traditional perspectives of two-sided markets comprising communications providers in the middle with content providers on one side and end users on the other are being replaced by modular business models to facilitate network investment and content delivery. The paradigm of content/application providers passively accessing of transport networks is giving way to a proactive approaches in which content provider develop individualized solutions and relationships for advanced, dynamic content delivery and competitive differentiation, in other words a multi-sided economic analysis is required for this new type of complexity.

Internet service providers (ISPs) simply don't have the market power that net neutrality advocates claim. Indeed there was little evidence before and now that ISPs have even acted on incentives to foreclose content and application providers. If anything, the market power in today's internet is wielded by platform providers such as Google, Amazon, Apple, Facebook, Netflix and so forth, not the ISPs.

As such, regulating just one party, for example reclassifying broadband providers as common carriers, is not only inappropriate in a converged digital world, but threatens to derail the evolving, innovative, and competitive internet ecosystem. As competition in the internet and communication industry is highly complex and dynamic, a transition to a general competition regime which will apply equally to all technologies, companies networks, and business models is preferable, not net neutrality. A general framework is not only

more appropriate for today's dynamic environment, but also "future-proof" for continued innovation and development.

For further reference you can see my specific papers on this topic, which have been published and discussed in different type of media. For example:

2014 Eaton, B, Elaluf-Calderwood, S, Sørensen, C and Yoo, Youngjin "Distributed Tuning of Boundary Resources: The case Apple's iOS Service System". Special Edition MISQ Journal. Accepted for publication. Forthcoming.

2014 Liebenau, J and Elaluf-Calderwood, S Challenges to European Internet Business Models - Governing a fragmented internet. Presented to the European Regional ITS conference, Brussels, Belgium. June 2014.

2014 Liebenau, J, Elaluf-Calderwood, S and Bonina Carla Modularity and network integration: emergent sustainable services in mobile payment systems. Presented at HICSS-47 2014. Hawaii, USA.

2013 Liebenau, J and Elaluf-Calderwood, S Metrics for Assessing Internet Business Models and Sustainability. The 41st TPRC Conference, September 2013. Available at SSRN: <http://ssrn.com/abstract=2221872> or <http://dx.doi.org/10.2139/ssrn.2221872>

2012 Liebenau, J., S. Elaluf-Calderwood, and Karrberg, P "Strategic Challenges for the European Telecom Sector: The Consequences of Imbalances in Internet Traffic." Journal of Information Policy 2: 248-272. Accesible at: <http://jip.vmhost.psu.edu/ojs/index.php/jip>

Sincerely,



Silvia Elaluf-Calderwood, Ph.D.
103 Winged Food Lane, Boca Raton, FL 33431
www.elaluf-calderwood.org