

NETWORK NEUTRALITY SHOULD BE VIGOROUSLY PROTECTED AND NOT WEAKENED.

Not one little bit. Any proposal or amendment suggested by the big ISPs and transit carriers should be rejected, because they are designed to erode network neutrality and give these providers more-favorable market advantages. *This is their business model.*

If anything, the right action to take is to give the Internet common carrier status, which should have been done from the start. And, yes, if that means regulating ISPs, that's just fine. How else can consumers be protected against these near-monopolies? These companies able to provide awful services (Time-Warner and Comcast have the WORST customer satisfaction ratings of *all* companies in the United States) and gouge their customers. It makes sense that they should be regulated as monopolies.

THE FCC HAS TWO RESPONSIBILITIES HERE:

- 1) To prevent incumbent companies from gaining advantages over other their competitors, whether they are newcomer ISPs or competing information providers.
- 2) To prevent these companies from getting even more monopolistic power over their customers (by giving their products an unfair competitive advantage).

These ISPs (AT&T, Comcast, Verizon, Time-Warner, etc.) already have huge market advantages due to near-monopoly positions in their service areas: Most consumers have only one "choice" for high-speed Internet access) and most of these companies require one-year (or longer) "lock-in" contracts.

In their other market segments (mostly cell phones and TV access) these companies have business plans in other media (that rely on three things:

- Customer lock-in, via multi-year contracts, a near-exclusive market position, or both;
- A captive audience for advertising (the ads in TV shows);
- Exclusive positioning for some add-on services, such as
 - Visual voicemail (Apple+AT&T),
 - One-click purchase of apps/games in their phones (typically producing a monthly revenue stream that's often invisible to the consumer and is often difficult to cancel),
 - Priority throughput for *their* apps across *their* networks, which degrades the performance of competitive products.
 - Exclusive access to some TV content, such as the Olympics or Superbowl.

In summary, these companies are parasites.

Finally, it is frequently cited that Internet information providers (Google, Amazon, Apple, Netflix, etc.) have an unfair advantage over these ISPs. THIS IS HOGWASH. These information providers pay for bandwidth on the open market; the ISPs negotiate contracts with global transit providers; and the ISPs charge consumers based on contracted bandwidth limits.

The first two of these relationships are completely on the open market:

- Google, et. al. are free to negotiate contracts and price with the global transit providers (and there is plenty of choice there).
- The ISPs (the ones with the terrible sob story, remember?) are free to negotiate contract terms and prices with the global transit providers.
- The ISPs, on the other hand, can charge consumers whatever they can get, providing essentially no guarantees on service. (The bandwidth you pay for is the top-end limit, which the ISPs vigorously enforce. "Actual bandwidth may vary" - and it's usually much, much less.