Before the
Federal Communications Commission

In the Matter of	)	
	)	
Protecting and Promoting the Open Internet	)	**GN Docket 14-28**
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Reply Comments of Padmapper

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I. PadMapper Makes Apartment Hunting Easier for Millions

We're a very small company (two full time employees, one until recently), but thanks to the power of the free/open internet, we're able to help around a million people every month find a home to rent. We calculate that we save multiple human lifetimes worth of time every month, which would have otherwise been spent on a grueling, unrewarding process that helps no one. We've won awards, have made some money, and all of that, but I think that our impact is best measured by how much time we've saved people.

In order to get to this point, we've depended on fast, responsive connections. We try to deliver a native-app-like experience in a website. In order to do that, we have to send a lot of data to our users, and we need to do that quickly. In fact, we've been hampered by the slowness of many people's connections—we'd be able to reach many more people if everyone had access to fast broadband, and we'd be able to do more interesting things if we could assume that almost everyone could download a lot of data quickly. We could produce visualizations of the qualities of different regions, for example, and data-heavy comparisons.

II. We Could Have Never Founded this Company Under the FCC's Proposal

If we had to pay for a fast connection to people's homes, we wouldn't be able to offer our service for free to our millions of users. We also wouldn't have been able to grow to nearly this size. We would have had to charge people, which would have significantly limited our reach. The conversion rate from visitor to user is much, much higher when you don't put a demand for payment in the way. Millions of people would have stuck with the slower, less efficient methods; and in aggregate, millions of man-hours would have been wasted every month. And all of this would essentially be because ISPs want to open up new, hidden avenues of wealth transfer from their customers to themselves.

If I had known that I could be extorted at any time by ISPs in order to get a functionally fast connection to my users, I'm not sure I would have bothered with making a webapp. One of

the main reasons to write a webapp is that you can interface directly with people without going through an app store, or having to set up distribution deals, and no one rules you. Whenever I think about how Comcast, Time Warner, et al. have treated me as a paying customer throughout my adult life, I absolutely shudder to think what they'd do with that power over the Internet.

III. The FCC's Proposal Threatens Our Company's Future

In order to function in a way that appears indistinguishable from a native desktop app, we absolutely require responsive access from our users' browser to our servers. We've put an enormous amount of time into optimizing our software and server infrastructure to make our site consistently fast, and its dynamic functions responsive, because whenever someone hits a hiccup or a slow request, it breaks the flow of interaction with the software. It snaps them out of their focus, which leads to them wandering off to do something else while they wait, oftentimes never to come back.

If we were relegated to being a second-class citizen on the Internet, our users would use PadMapper quite a lot less. We've seen this very clearly in our data—when our pages are less responsive, our usage numbers go down.

So, that leaves us with paying. But we're a much smaller company than our usage would imply, and our lean business model doesn't have a lot of room to pay "protection money" to several different ISPs. We don't even have the human bandwidth to negotiate contracts with all of the ISPs out there. If we did pay, we'd almost certainly have to charge our users to use our site, which would destroy most of our usage, as every conversion from free to paid does.

Either way, it would decimate our usefulness and usage.

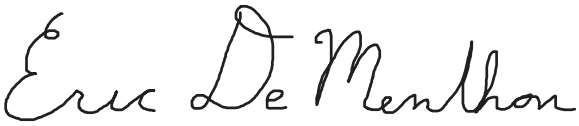
IV. We Do Not Have an Army of Lawyers to Negotiate With or Sue ISPs

We don't even have a full-time general counsel. If we had to pay ISPs, and an ISP decided that our offer wasn't good enough, and they decided to prioritize our competitors over us to put pressure on us, we couldn't possibly fight back. We couldn't afford to fight back against one ISP that tried this, let alone every ISP that would likely try this. This proposal is offering the ISPs a huge amount of leverage over essentially every internet-based company in existence. The only way to protect small companies like us is to enact bright-line rules against abuses.

The internet is an incredible public good, saving people time and money, and disseminating knowledge—and the government should not allow what are essentially infrastructure companies unmitigated power to tax that public good. These companies have shown time and time again that their primary way of doing business is via rent-seeking. It's complete insanity to provide power over the dominant source for software and information in most people's lives to these companies.

I think we need to go further than not enacting this proposal. I think that ISPs need to be classified as common carriers. I urge the FCC to enact bright-line rules which prohibit blocking, technical discrimination, and paid prioritization, and to classify broadband providers under Title II of the Communications Act, with appropriate forbearance.

Respectfully submitted,



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