Comment on Protecting and Promoting the Open Internet

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Introduction

The case of the 'open internet', or Net Neutrality ('NN') is one of critical importance to not just the millions of users of the internet, but to the entire population of the US, if not the world. As a communications medium, it's as revolutionary to civilization as the steam engine, or the telegraph line.

Thanks to the internet, whole new industries have been created, new ways of doing things have become 'normal' over the last decade or two and now there are few areas of our lives that are not impacted in some way by the internet.

It's also an incredibly dynamic area. Teenagers now would have great difficulty in just understanding and accepting the technology that was around at the time they were born. In this, there has been more progress and change over the last 20 years, than there is in most fields in a century or more.

However, for this new sphere to continue to grow and flourish, it must not be constrained to the wishes of a few players, who become gatekeepers and king-makers, getting to pick winners and losers.

In this, Network Neutrality is essential. The greatest change, and the greatest risk always comes from the new player, who can take a risk banking on differentiation, rather than an entrenched brand, who has an incentive to keep to the status-quo as much as possible, where there are no threats to their dominance, and risks are known, and minimized.

And so we come to the statist contradiction. In order for there to be change, there needs to be no change to the historical (for a value of history that may only be a decade or two) of position on Net Neutrality.
By contrast, a change in the way the network infrastructure is administered and managed will lead to a dearth of innovation, and a shift in progress out of the US and into a more future-friendly country.

History

I am, in some ways, one of the reasons for this call for comments. In July of 2007, I was made aware of a claim[i] by Rob Toplowski concerning Comcast and BitTorrent. At that time I had just started work as the lead researcher for TorrentFreak.com, a news site, based in the Netherlands that focuses mainly on BitTorrent related news. Over the next few weeks, I contacted Comcast users all over the US, and performed controlled tests which confirmed Mr. Toplowski's claims. We published our findings August 17 2007[ii].

Our reports led the Electronic Frontier Foundation (EFF) and Associated Press to run their own tests, where they confirmed[iii] our findings.

What was newsworthy as much as the throttling of BitTorrent itself was the unintended consequences. Despite the attempts to narrowly target the restrictions, it ended up triggering on actions outside the designed scope, including Lotus notes[iv], which is a significant problem for internet users.

When we pushed for details with Comcast, we found they denied knowledge, despite it being listed in company documents. Eventually they admitted it, after hearings, and set up a token fund to compensate users. Thus, Comcast readily admitted, and acted with foreknowledge that NN was expected, and so actively attempted to hide it. They also understood the public upset and outrage, even paying for people to 'hold seats' at an FCC hearing, to keep others out.

This has led to orders, and court battles of which the FCC is well aware of. Nevertheless, I felt that a brief recap of the initial history was needed, along with highlighting my own experience in the topic.

Protecting and Promoting the Open Internet

Network Management.

Many of those who advocate for a change to the longstanding NN policy do so from a position of 'network management', especially when it comes to popular high bandwidth applications.

One particular example again involves BitTorrent, and is from 2008.

In late 2008, one of the most popular BitTorrent clients, µTorrent, was moving towards a protocol shift, moving from TCP-based communications to UDP. In effect, the client would be performing the jobs that differentiate UDP and TCP itself, and doing so in a way that attempts to keep a domestic internet connection usable for longer.

I had been testing the new protocol, called µTorrent Transport Protocol (or 'µTP') for a number of months, and had found it fast, and efficient. But not everyone was so welcoming to the new protocol.

In an Op-ed piece on UK tech news site The Register, noted network engineer Richard Bennett wrote one thousand words about how this was going to 'destroy the net'[v].

> *"The best way to ensure that µTP doesn't kill the internet is to throttle it at the source, and any law that stands in the way of ISPs exercising that level of management is deadly to the internet. We can thank the uTorrent developers for reminding us of that salient fact."*

Unfortunately for Mr. Bennett his predictions, like almost all that attempt to justify abolishing Net Neutrality, turned out to be as reliable as any other doomsday prediction, and utterly failed to pass.

Yet that doesn't stop him, and others who work for companies that make filtering and prioritization technologies or advocate and 'advise' the FCC[1] and yet half the time he has no clue what he's talking about. A prime example is in a comment on his own site on this from December 3 2009, where he states

> *The most celebrated claim of BitTorrent blocking, at Comcast, wasn't really blocking, it was a quota system that reserved half of the upstream for non-BitTorrent uses.*[vi]

The only problem is that it had been detailed extensively over the previous 18 months that it was indeed the case. As with most positions taken against Network Neutrality, the only time statements can be made is you ignore facts, and reality to present a fabricated reality. His ignorance of the overall situation regarding ISPs and network infrastructures can be summed up in this twitter conversation[vii] with him from earlier this week.

[1] His Curriculum Vitae lists numerous occasions of 'advising' the FCC

5½ years on, there's still not been any meltdown. The only thing it does destroy is the Sandvine system used in the earlier Comcast chicanery, since UDP (which is used by µTP instead of TCP) has no RST packets for the Sandvine equipment to spoof.

Of course the underlying problem that led to the development of µTP – network infrastructure that fails to keep pace with the demands of the users – is never addressed. This is a common theme.

This problem - chronically oversold connections – is becoming an increasing problem as internet providers fail to adequately upgrade networks, and put them off. With the reduction in capital costs, by not upgrading, that realizes higher profits. And thanks to those same capital cost boundaries to competition, there is little chance of realistic competition to encourage growth and network expansion.

Network Infrastructure

Some 15-17 years ago, the internet was just getting started as a major force. It was the height of the dotcom bubble, and yet we were mostly using dialup modems with some variant of 56k technology[2], or slower. At roughly 5Kilobytes/second download speed, and 3 up, they were not the speediest of things. 15" CRT monitors running at resolutions of 1024x768 were common and so bandwidth-hungry tools like streaming video was not an option. Network infrastructures could cope easily, and those that had a desire (or need) for higher speeds could pay a premium for that.

I remember observing an install of a T1 (aka DS1) line in November 2001 to the former Nash Bridges studio on Treasure Island Naval Base, in the San Francisco Bay. The 1.54Mbit synchronous connection would be considered pathetically slow today, but was blazingly fast for the time by consumer standards.

Fast forward to now. 100Mbit or faster is available in many areas of the US, with Gigabit connections available to come. However, many areas (including my own) lag behind.

In fact my local internet provider options underline this problem. I currently reside in the Metro Atlanta region, approximately 40-55 miles from three major cities (Atlanta, Athens and Macon) and yet my internet options are extremely limited. They are

- AT&T DSL
- Comcast High Speed Internet
- Hughsnet satellite internet
- Verizon cellular coverage

Out of these, each has issues. Verizon, while it's provided 4G coverage since the start of 2013 in this area, is extremely expensive, and 2 GB of data does not go far.

Hughsnet is similarly an issue. For roughly $50/month, they offer a 10/1 plan, but only 20Gb of data, only half of which can be used outside the period 2am-8am. There is also the common issue (due to the technology) of significant lag, meaning it's not usable for certain tasks.

Comcast does not actually offer service. It's a Comcast "franchise area" that does not offer any sort of account.

AT&T is thus the only internet provider in the area that offers any sort of usable service. And as such they have no incentive to improve services. As a result, since 2007, the service level has not increased at all. Nor has the price decreased. It's been stable at $52 for a 6/0.5 Mbit

[2] Both USRobotics X2 and Rockwell Lucent's K56Flex technologies came out around Feb 1997. An ITU compromise standard, V.90 came out August 1999.

connection since 2007 (the best package available, and no-longer classified as broadband). In fact things have been made worse, with the imposition of a 150 GB cap[viii].

Even with this slow connection, that's a rather low limit. If we assume a realistic speed limit of 600kbytes/sec down, that's a theoretical maximum of 1.57 Terabytes (or 1500Gigabytes) that the line is capable of just on the downstream. The 50Kbytes/sec of the upstream also counts and be another 131Gbytes.

So the reality is that a connection that has not had its speed improved in 7+years, or had any kind of price cut, instead became less useful 3 years ago with an imposition of a cap which attempts to limit customers to one tenth of the capacity they've previously had. And all the time bandwidth costs have dropped significantly.

This is crucial because generally the next step is invariably to start exempting data from these caps. In AT&T's case, it exempts its own traffic[ix], giving consumers a strong incentive to use that service rather than a competitor, so they won't suffer overage.

Comcast similarly does the same[x] with its video services, and has instituted caps at various times over the past several years.

Such caps all have two things in common. They are a response to chronic overselling of network infrastructure, usually accompanied by a refusal (or at least a significant reluctance) to improve that infrastructure.

Some defend the practice as 'good economics' and liken the practice to that of airlines who often oversell seats on aircraft, to try and ensure they're as full as possible. However, it's usually only a small oversell (10% or so) and if more people turn up than expected and it is overbooked, they have to give everyone what they paid for, and those that can't fit on the flight, they have to compensate on top of the trip they've paid for. ISPs by contrast just keep jamming people into the overhead lockers, stuff people in the toilets and would lay them across the pilot's lap if they could.

They've been covered in this by fine print and though marketing tricks, such as listing speeds as 'up to', rather than giving an accurate description of the product/service they're trying to sell. In no other industry do we allow a product to be priced and sold at a theoretical 'best' rate, irrespective of the actual quality of the product received. In fact in almost every other industry, such behaviors would result in court cases, or other proceedings.

Now, this would be less of an issue if the networks were in a constant state of upgrade, or if the upgrades were done in a coherent manner from the companies own coffers; but that is not the case at all.

It's a common story with broadband providers. They set up a deal with a state and then renege on the deal when it comes time for their end.

Let's take Verizon and New Jersey as an example.

In 1993, New Jersey Bell agreed to a price regulation system that would allow the company to make more money, Verizon New Jersey (Verizon later took over New Jersey Bell) agreed to a program called 'Opportunity New Jersey" which would see their 'territory' set up with a

45Mbps (both upload and download) fiber optic service by 2010. This they failed to do. The specifics of the contract are clearly laid out in the request for comments[xi] put out by the New Jersey Governor's office in January of this year.

> *WHEREAS, on May 6, 1993, in Docket No. T092030358, the Board issued an order approving a plan of alternative regulation ("PAR-1") for Verizon NJ's predecessor New Jersey Bell Telephone Company. PAR-1 included a plan for accelerated deployment of advanced switching and transmission technologies for its network known as Opportunity New Jersey ("ONJ"). The service capability and technology deployments outlined in ONJ were based upon assumptions regarding technology, markets and economic conditions over an extended period of time.*
>
> *WHEREAS, PAR-1 required Verizon NJ to fully deploy broadband service in its service territory by the end of 2010 and provided for the monitoring of Verizon NJ's progress regarding such deployment.*
>
> *WHEREAS, by Order dated August 19, 2003, in Docket No. T001020095, the Board approved a second plan for alternative regulation ("PAR-2") that replaced PAR-1, but left in place the requirements of ONJ established under PAR-1.*
>
> *WHEREAS, on March 12, 2012, the Board served on Verizon NJ an Order to Show Cause directing Verizon NJ to show cause why the Board should not find that it failed to comply with the PAR Orders in providing full broadband capability in its service territory by 2010; and to file an answer to the Order to Show Cause.*

The response was to say that they only needed to provide access to 35 people in a census area, and only if they can't get service any other way (including 4G wireless, or Verizon's own DSL service) and that if they find anyone like that, they've got 9 months (extendable to 15) to wire them up.

Of course, if the agreement was to provide 'at least DSL or 4G service', that would have been the stipulation, and there would have been no need to pay for (or require) a 45Mbps synchronous connection, they could have just said 'give them DSL'.

Meanwhile, they had no problems accepting the funding without restrictions or conditions – an amount estimated at some $15 Billion[xii] over the last 20 years in charges made for this 45Mbps 'opportunity New Jersey rollout, that turned into ''you can have the same crappy service you were getting anyway'.

They're not alone in this, however.

I have already mentioned the poor state of broadband access in the Shady Dale/Monticello Georgia region. What I've not mentioned is that upgrades that were scheduled never came.

In 2007 a lightning strike in Monticello took out a number of connections for people in the area. Modems were fried, and some damaged equipment at the exchange needed replacing. While talking to the repair technician, he informed me that the U-verse service was just being installed in Covington (the local major town, most famous for its film and TV roles including Smokey and the Bandit, Vampire Diaries and American Reunion amongst others[xiii]). I was also told they were going to start expanding it down towards Monticello over the next year.

A few months later I'd moved to Shady Dale, and in the summer of 2008 I had to call out another AT&T technician because of line issues. While he was fixing it, I asked about the upgrades and was told that they'd started, and they had a big bunch of fiber in the offices, ready to install 'this way'.

It's now 2014 and there has been no installation. When I next had need of a technician in 2010, I asked him about it, and he had no knowledge of any u-verse installation, or any plans to do so. In fact, there are no upgrade plans at all for this area, meaning the price and infrastructure is going to stay at the condition when AT&T bought it from BellSouth. Absolutely typical when you look at the press release[xiv] from the merger, with Bellsouth's CEO, Duane Ackerman, give the usual platitudes that end up being lies.

"This was the right time for this merger," said Ackerman. "This combination is good for our employees, our customers and our stockholders."

Well, it wasn't so good for the customers, like me, who are locked in (because of lack of alternatives) to a company that, because of that monopoly, will not cut prices, or increase service to match the common pace in technology. The FCC realizes this, which is why the definition of 'broadband' has increased over time.

This is why AT&T can still charge $50+ per month for what is no-longer considered broadband. After all, what can I do? Move house?

The "Netflix Problem"

This leads on to the Netflix problem, which has become the public face of the Net Neutrality debate. In this area, Over the Air (OTA) broadcast signals are nearly non-existent. In order to get any kind of decent signal on more than one channel, houses here would end up bristling with so many antennas people would mistake it for an NSA listening post. As we've already established, Comcast doesn't provide service (but has the 'franchise', so no other company will attempt provide service) which leaves two options; satellite TV, or internet broadcasts.

There are many reasons people no-longer want to subscribe to satellite TV, including its weather-dependence, poor service and increasing costs. It's why 'cord cutters' are increasingly common. The problem is that network issues are turning people off. It's one reason people turn to peer-to-peer systems.

Over the 7 years I've been working at TorrentFreak, there's been one trend I've noticed. P2P usage peaks with content that's both highly promoted, and restricted in its availability.

In July 2011, we predicted[xv] that Fox taking their Hulu delay from next-day, to 8 days would increase BitTorrent demand for those shows. So in August we checked and found[xvi] surges of p2p usage, with Master Chef showing a 189% increase of US downloads.

So, when there are issues with Netflix streaming (or even YouTube playback) people have a tendency to shift towards p2p and copyright infringement. In this, increased network capability may lead to a reduction in copyright infringement due to increased ability to access on-demand media.

Yet infrastructure shouldn't be a problem. Over the last 20 years, there have been vast investments in broadband infrastructure, including the aforementioned $15Billion in New Jersey. Indeed, there are estimates[xvii] that some $200Billion has been essentially 'gifted' to the major ISP's for network infrastructure upgrades, which have not been realized.

The American public has paid for a high speed internet infrastructure, the Buick of ISP options even if not the Cadillac, and yet we've ended up with the Yugo.

Potential Censorship

There's also another issue. By abandoning Net Neutrality, and going to a tiered or 'fast lane' system, there becomes a potential for censorship. After having caused Comcast so many issues, you can imagine we're not high on their list of favorite sites. So if there's going to be two 'speeds' of access, you can be sure which side Comcast will put us on.

Now, if we were to pay, the question would be "how much?" (Although it's obvious that as a text-based news site, we wouldn't need it, it's mostly for illustration). The details of the deals Netflix have made with Comcast and Verizon are not publicly available. So any deal we were to make would be doing so blind, and could cost us significantly more than other players.

Then there's the ability to select and impose moral and/or political ideologies through selective bandwidth support. This is already happening to an extent with site blocking in Europe, (such as with The Pirate Bay, and its artist promotion subsidiary, The Promo Bay[xviii]) which ends up reducing the access to free distribution tools for small artists ,including myself – my first book, No Safe Harbor[xix], I made available in eBook format on The Pirate Bay in multiple formats.

Innovation Hindrance

It ends up becoming another hurdle to innovation. It can also hinder site take-up and 'conversion'. Several case studies[xx], including companies like Wal-Mart, Amazon, and Tagman have shown significant decreases (between 2-10%) in sales for just a second's extra load time.

As a result, paying for 'fast lane' access will end up becoming a standard practice for any and all e-commerce based site. When 'fast lanes' become de rigueur, then the slow lane becomes the exception, and so it's an extra cost for any new business in order to be competitive.

And despite hopes, this paid system, as it is a 'bonus' will only be a short-term fix, if it fixes anything at all.

Over the last 20 years, we've funneled billions of dollars into paying for internet infrastructure that's never been installed. What minimum upgrades that have been performed over that time have been done only by necessity. With the new paid prioritization system, such upgrades can now be attributed to that paid system and the non-paid system are likely to stay on any pre-existing infrastructure. If that isn't good enough, it will be incentive for companies to pay for the fast-lane access.

To imagine that that his ‘fast lane’ proposal will lead to any increase in infrastructure rollout, upgrades, or modernization would be exposing a wishfullness that underscores a trusting ignorance of the broadband market.

Competitive Mandate.

The biggest problem with the US Broadband infrastructure is the significant lack of competition. When there’s no competition, there’s no incentive to compete on price, or service. Having a single DSL provider, and a single cable provider, is not a competitive situation. Even taking DSL or Cable and encouraging competition, so there are multiple providers will lead to an increase in backhaul capacity, and a downwards pressure on price, along with an increase in customer service.

In the UK, despite there being a near national cable monopoly, there is significant competition in the DSL-based broadband market, meaning faster speeds and lower prices compared to the US, and that is despite 4G cellular competition being in its infancy (launching only last year, following a Feb 2013 spectrum auction[xxi]).

A lack of competitive options, brought about through actions that often have the appearance of fraud, corruption, incompetence, or corporate welfare, is not in the best interests of the US, its residents, corporations, or its future. The only ones that benefit are the shareholders of the companies maintaining the monopoly positions.

This even extends to lobbying efforts to try and prevent local communities, who are fed up with the entrenched providers, from setting up their own municipal networks. Just this past week an amendment was rammed through spearheaded by Rep Marsha Blackburn[xxii], aimed at preventing municipal broadband, presumably in response to something Chairman Wheeler is proposing[xxiii]. It’s puzzling why Rep. Blackburn would feel that need, considering the success in her own state of such projects.

Thankfully, a state law here in Georgia (HB282[xxiv] proposed by the former Operations Manager of Bellsouth, Don Parsons[xxv]) failed, although similar laws have passed in both of the Carolina’s.

Companies claim they “can’t compete with government”, and yet it’s clear it is more a case of “don’t want to compete with anyone”. When Google announced that Austin was to be the next Google Fiber city, it was only a matter of hours before AT&T announced[xxvi] it too would roll out a Gigabit network. It’s more than just a coincidence, but an underline highlighting the great lengths the incumbent operators will go to in order to avoid competition and infrastructure upgrades unless absolutely necessary.

Solutions

There are no easy solutions. While it is going to be expected that any such ruling from the FCC will be appealed, there needs to be a significant look at both the past and the future, and not just focus on the 'now'.

In the past, incumbent operators have been unwilling to abide by deals. Much like a small child wanting a treat now in exchange for doing a chore later, once the treat is over, the chore is forgotten. As President Bush once famously said [or at least tried to]

"Fool me once, shame on you, Fool me twice, shame on me"

As a nation we've been fooled once by the promise of infrastructure build-outs if the 'treat' of subsidies, taxes, credits etc. were granted. It has not happened. They understand that it's not an acceptable action all too well, as can be easily demonstrated:

Sign up for service with them. Then after a month's usage, decide to pay them only ¼ of the bill, and see if they'd be happy with that. As is obvious, they wouldn't be, and would terminate the account, and send the bill over to collections.

It's time the same playbook, for the same actions, were used on them.

As a nation, we have paid for a service, but we have not received that service. By their own demonstration, the appropriate action is to terminate the account and send it to collections.

This isn't exactly possible, so there are other alternatives.

The main one is Title II. With the billions we have invested in broadband infrastructure, there is clearly a need and a public use case for it (else why would we have invested so much?). Yet it's clear that the stewardship is poorly managed (as evidenced by the high prices and low speeds). In addition, in some aspects, the companies have no issue with Title II classification, as long as it brings them money. A narrowly tailored Title II classification is thus not only in the public interest, it is in the fiscal interests, and backed by acceptance (at least in some aspects) by the major ISPs.

The ideal solution would be to divest the infrastructure and service sides entirely, separating the aspects of the wiring, from those providing a service over that wiring. This would be a massive step, if anything more complicated than the 'Bell Breakup', but would be the best long-term solution, although how to provide for growth, both upgrades and expansion, is a complex question to answer.

However, there's no doubt that the status quo ante is not an acceptable way forward, and that there is significant evidence that the major broadband ISPs have no respect for any deals or contracts they may have signed. As such, any agreements made **must** include significant penalties, including forfeiture of any 'treats' (with interest) **and** punitive sanctions. This should be a no-brainer for any future deals with major telecom interests, but is essential to reiterate, as getting fooled again, means the shame is on us, for being hoodwinked the same way a second time.

Of perhaps greatest concern, however, should be the significant lack of competition in all aspects of broadband and broadband deployment. Broadband is most definitely not an 'information service' any longer, but a true telecommunications service. Over the past month alone I've used by DSL connection to conduct conference calls with people all over the world, from the UK to Australia. During a period at the start of the month when my cellphone had issues, I used my computer as a backup (via my Google Voice number). So, at the very least, broadband needs to be reclassified as a telecommunications system, and not an 'information service'.

This will help us look towards the future, and towards something that is good for the country and economy as a whole, rather than for a few shareholders at a few companies, to the net detriment of us all.

Sincerely,

Andrew Norton

References

[i] http://www.dslreports.com/forum/r18323368-
[ii] http://torrentfreak.com/comcast-throttles-bittorrent-traffic-seeding-impossible/
[iii] http://www.nbcnews.com/id/21376597/
[iv] http://arstechnica.com/uncategorized/2007/10/comcast-traffic-blocking-even-more-apps-groupware-clients-affected/
[v] http://www.theregister.co.uk/2008/12/01/richard_bennett_utorrent_udp/
[vi] http://bennett.com/blog/2008/12/note-about-udp/#comment-5826
[vii] https://twitter.com/iPolicy/status/489193274595217408
[viii] http://arstechnica.com/tech-policy/2011/03/is-atts-new-150gb-dsl-data-cap-justified/
[ix] https://www.publicknowledge.org/news-blog/blogs/att-exempts-itself-its-data-cap-violates-leas
[x] http://xbox.comcast.net/faqs.html
[xi] http://www.state.nj.us/bpu/pdf/telecopdfs/20140129_verizon_notice.pdf
[xii] http://www.huffingtonpost.com/bruce-kushnick/show-me-the-money-verizon_b_5023898.html
[xiii] http://en.wikipedia.org/wiki/Covington,_Georgia#In_film_and_television
[xiv] http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=22140
[xv] http://torrentfreak.com/fox-will-boost-u-s-tv-show-piracy-110728/
[xvi] http://torrentfreak.com/foxs-8-day-delay-on-hulu-triggers-piracy-surge-110822/
[xvii] http://www.newnetworks.com/ShortSCANDALSummary.htm
[xviii] http://torrentfreak.com/uk-isps-block-pirate-bays-artist-promotions-121202/
[xix] No Safe Harbor, ISBN-13: 978-1468033991
[xx] http://www.icrossing.co.uk/slow-pages-lose-users
[xxi] http://consumers.ofcom.org.uk/news/ofcom-announces-winners-of-the-4g-mobile-auction/
[xxii] https://www.techdirt.com/articles/20140716/09525527897/why-does-rep-marsha-blackburn-want-to-block-you-having-competitive-broadband.shtml
[xxiii] http://arstechnica.com/business/2014/04/state-laws-that-ban-municipal-internet-will-be-invalidated-fcc-chair-says/
[xxiv] http://openstates.org/ga/bills/2013_14/HB282/
[xxv] http://www.donparsons.org/bio.htm
[xxvi] http://www.prnewswire.com/news-releases/att-announces-intent-to-build-1-gigabit-fiber-network-in-austin-202156751.html