



September 15, 2014

Via Electronic Filing

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

Re: Notice of Ex Parte Communication: *Protecting and Promoting the Open Internet*, GN Docket No. 14-28; *Framework for Broadband Internet Services*, GN Docket No. 10-127; *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354

Dear Ms. Dortch:

On September 11, 2014, Craig Barratt, Senior VP Access & Energy, Nia King-Rubie, Public Affairs Analyst, and I met in Mountain View California with FCC Commissioner Jessica Rosenworcel and David Goldman, her Senior Legal Advisor, to discuss Google's continued support for an open Internet.

During the meeting, Google emphasized the important role that the FCC plays in achieving an environment of bandwidth abundance. The Commission's Internet openness rules should facilitate a competitive environment that promotes investment and innovation by broadband providers, while at the same time, as the market evolves maintain an open Internet based on principles espoused by the Internet Association in this proceeding.¹

In addition to these principles, Mr. Barratt discussed the importance of crafting FCC rules that encourage investment in abundant bandwidth rather than provide incentives to monetize scarcity. Allowing broadband Internet access providers to engage in "paid prioritization" of particular Internet content could create incentives for providers to maintain scarcity and congestion on their networks, in order to sell services that avoid these artificial conditions.

Through projects like Google Fiber and Google's efforts to expand access to both licensed and unlicensed wireless spectrum, we are helping to make Internet bandwidth more abundant. Mr. Barratt discussed how the company's experience with Google Fiber -- Google's U.S. gigabit fiber-to-the-premise service -- suggests that it is both workable and economically desirable to manage a broadband network without prioritization and consistent with open Internet principles. Indeed, as explained in the meeting, Google is practicing the same open Internet principles that we encourage all broadband Internet access providers to abide by.

¹ The Internet Association Comments (filed July 14, 2014).

Like other Internet providers, Google Fiber provides the 'last-mile' Internet connection to consumers' homes. We also partner with content providers like YouTube, Netflix, and Akamai to peer directly with us and collocate their equipment in our Fiber facilities. Mr. Barratt explained that our collocation arrangements do not involve prioritization or discrimination. Nor does Google charge for peering or collocation. Mr. Barratt explained that entering into these collocation and peering arrangements makes solid business sense. Google benefits from being able to deliver a better experience to our customers and we reduce costs because the distance we have to transport the video traffic -- from a local server to the end user -- is shorter.²

As technology evolves, the broadband ecosystem will be well-served by a policy environment that removes barriers to investment, discourages monetization of scarcity, and empowers consumers. To ensure that the Internet reaches its full potential as an engine for growth and innovation, Mr. Barratt encouraged Commissioner Rosenworcel to support rules that will preserve, for all types of broadband access networks, the standards of nondiscrimination and no-blocking on which the Internet was built.

Finally, the conversation briefly turned to unlicensed spectrum. Mr. Barratt emphasized our recently submitted technical study in the FCC's 3.5 Ghz proceeding showing that fixed exclusion zones are not needed in the 3550-3700 MHz band and that dynamic exclusion zones can be implemented with existing technology. He reiterated Google's support of the proposed three-tier licensing framework, with spectrum assigned dynamically.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,



Staci L. Pies
Sr. Legal Counsel
Google Inc.

cc: *Via Electronic Mail*
Commissioner Rosenworcel
David Goldman

² See *Behind the scenes with Google Fiber: Working with content providers to minimize buffering* (May 21, 2014) <http://googlefiberblog.blogspot.com/2014/05/minimizing-buffering.html>