Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Protecting and Promoting the Open Internet	)	**GN Docket No. 14-28**
	)	
Preserving the Open Internet	)	**GN Docket No. 09-191**

COMMENTS OF LAURA QUILTER

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I welcome the opportunity to comment on Proceeding 14-28. I am a librarian and information policy attorney, who has been teaching people how to use the Internet and advocating for access to the Internet since 1992. I agree with the legal analyses offered by Public Knowledge and FreePress in their respective filings, but rather than reiterate the same legal arguments, offer instead my personal observations and experiences.

My Perspective and Experiences

In 1992, as a library science graduate student, and an acting librarian at the Kentucky Department for Environmental Protection, I began to hold workshops to teach scientists and policy-makers to use the Internet for email, telnet, ftp, and gopher. In 1995, as a librarian, I began giving talks, demonstrations, and workshops about the Internet to library science students, to professional librarians, and to the public. I also began working with the Southwest Youth Collaborative in Chicago, to establish a community computing center and training for area youth in developing websites and using the Internet to access information. I co-organized a public program in Chicago in 1996 about the Telecommunications Act of 1996, focusing on the e-rate, media ownership rules, and the Communications Decency Act. After moving to San Francisco to work at a science museum, I began teaching primary school teachers and librarians about incorporating the Internet into their teaching.

Throughout the 1990s, my message was this: The Internet will revolutionize access to information. Even more importantly, the Internet will usher in a new Gutenberg Age — the opportunity for each person to be their own printing press, and to contribute their knowledge and passion to the world, whether for profit or fun or both.

It is safe to say that promise has been fulfilled. Blogs, open content projects such as Wikipedia, the open access movement to expand access to professional research — each of these provides access to information, but also provides a platform for speech. The Internet has become the premiere platform for speech, allowing the greatest explosion in human expression and creativity — in human communications — ever seen.

But even as this age was dawning, it was under threat, and so I went to law school, to better respond to changes in law that were affecting people's access to and use of the Internet. For more than ten years, I have conducted research, written, taught, and advocated on behalf of libraries, creators, activists, prisoners, educators, and many others who use the Internet as a platform for speech as well as a source of information.

My perspective, therefore, is informed by these experiences and these beliefs. But it is also the perspective of a parent and community member, a librarian and teacher, and an individual. In these capacities I have used the Internet to conduct business, find jobs, and communicate with family. I have also used the Internet to

pursue hobbies and contribute knowledge freely to the world, to communities large and small. I pay for Internet access — I pay quite a lot, actually — and it is unreasonable and unfair to ask me to pay twice: Once for my own Internet access, and a second time when my content providers pass along the extra charges that Comcast has deemed "commercially reasonable".

My perspective is also that of a technologist, because I have established and run numerous websites for my own projects and those of others. I host websites for friends and colleagues who sell art, have lawfirms, small hobbyist businesses, family websites, and fan websites. While some of these are commercial businesses, none of them could afford to have to pay twice for Internet access — first for hosting, and a second time to reach their audiences. And none of them should have to: They have paid for their Internet access, and so have their customers in their own Internet access subscriptions. It would be manifestly unfair for Comcast, AT&T, or Verizon to establish "commercially reasonable" pricing that discriminates amongst content providers, in hopes of seeking yet more profits. And it would harm their businesses and enterprises, when they lost traffic and customers to sites that *could* pay.

My Experiences with Existing Broadband Services

I have experienced firsthand the impossibilities of finding competitive broadband services. In my hometown of Amherst, Massachusetts, a small to mid-sized college town with a significant rural population, we have exactly one high-speed broadband provider — Comcast.

Satellite is not viable for many homes, including my own, because of tree coverage; but of those colleagues and friends who have been able to make use of satellite, the service has proven unreliable, with significant latency. It is not possible to reliable run servers or businesses on satellite. It is, needless to say, also too expensive for many members of our community for home access.

Verizon offers "high-speed" via their mobile network, but speeds are much lower, and, again, service by all accounts, is spotty. DSL is offered, but is not truly broadband; as with Verizon, the speeds are too low to allow business use, or even home use for a large family or individuals with Internet intensive uses.

Comcast is the only game in town, therefore, and this is unfortunate. Comcast's negative reputation for service and cost are well-deserved. I pay more than $80 per month for asynchronous uploading and downloading speeds, that are still considerably lower than a colleague in South Korea might get for a tenth the cost. But because Internet access is critical to my work, and to my life, I pay, and I am lucky to be able to afford it, and lucky that I have it at all.

Colleagues and friends who live in the rural communities (Shrewsbury, Leverett,

parts of Pelham, etc.) immediately adjacent to Amherst often have no options for high-speed broadband. For this reason, the town of Leverett is investing in a municipal broadband program; citizens are lining up to finally — in 2015! — have Internet access to their homes and businesses.

The situation was no better when I lived in Boston, where again, my choices were virtually the same — Comcast, Verizon wireless, DSL, satellite — and with virtually the same outcome. Overpriced, underperforming, and all too often unreliable Internet service.

I support reclassification of broadband services under Title II.

The FCC must take this opportunity to reclassify broadband providers under Title II of the Telecommunications Act of 1934. It is self-evident to me, and to the public, that Internet access is a public utility. Indeed, when I teach or give talks about these issues, people are shocked and surprised that Internet access is not already legally regarded as a public utility.

The "commercially reasonable" standard proposed by Chairman Wheeler in Docket No. 14-61 is utterly unacceptable. Sadly, broadband providers by their very conduct have demonstrated the necessity of classification of broadband services under Title II. Establishing a "commercially reasonable" standard that shifts the burden to complainants to demonstrate unreasonableness will both establish unfairness as the default, and simultaneously render impossible effective enforcement even of that low standard.

The lack of competition is a serious problem, exacerbating all the other evils of a regulatory regime that does not fully require common carriage rules and net neutrality.

I support development of municipal broadband to enhance competition.

In addition to reclassifying broadband services under Title II, the FCC must use its authority to preempt the anti-municipal broadband state bills that have been passed. Reclassification will only solve part of the problems Americans suffer: It will ensure common carrier treatment including nondiscrimination, and it will prevent blocking, and it will enable greater competition among services.

But it will not by itself create competition, and it may not resolve all problems such as the artificially created interconnectivity disputes. The most effective way to thwart artificial logjams is to have a truly competitive marketplace for broadband services. But competition is being thwarted in many of the very states that most need it — states with vast underserved populations in rural areas, for instance — because the telecommunications industry has repeatedly lobbied states to pass anti-municipal broadband legislation. The FCC has every right to preempt these anticompetitive state

laws, and to enable municipal broadband competition.

Respectfully submitted,
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