

FCC Comments on 'Specialized' and Application of Openness Principles to Mobile Wireless Platforms

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October 12, 2010

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Supporting Documents

These comments were submitted in response to the Commission's September 1, 2010 Public Notice announcing a further inquiry on the subjects of "specialized" services and the application of openness principles to mobile wireless platforms.

Specialized Services

In CDTs view, the goal of the Open Internet proceeding should be to ensure the preservation of basic Internet access service that is, Internet access service that operates on a best-efforts basis, is fully open to independent speakers and innovators, and creates a platform on which innovation can occur without any network operator permission. Network operators may well offer additional services that reflect different business models or technical architectures. But such services should create additional options to ordinary Internet access. The Commission's approach to "specialized" services should reflect this principle; network operators should have leeway to experiment with service offerings that are not Internet access, so long as such services do not impair the robustness, availability, or openness of the operators Internet access offerings.

Cabining the impact of specialized services on regular Internet access service requires that the two types of services remain distinct and that the Commission actively police the line between them. In policing this line, the Commission needs to look at both functional and technical characteristics.

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