



July 13, 2010

Chairman Julius Genachowski
Commissioner Michael J. Coops
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission (FCC)
445 12th Street SW
Washington, DC 20554

Re: GN Docket No. 10-127

Dear FCC Chairman and Commissioners:

Women Impacting Public Policy (WIPP) is a national, nonpartisan organization comprised of half a million women business owners as members and representing forty-nine (49) national Women in Business groups. We are a nonprofit organization that advocates for and on behalf of women and minorities in business, strengthening their participation in the legislative process of our nation, creating economic opportunities, and building bridges and alliances to other small business organizations. Through WIPP, our collective voice makes a powerful impact on Capital Hill and with the Administration. Pursuant to our goals, WIPP encourages the Federal Communications Commission (FCC) to continue classifying broadband Internet services as an “information service” under Title I of the 1934 Telecommunications Act as amended in 1996.

As you know from previous correspondences, WIPP supports the objectives of the National Broadband Plan. WIPP believes that the FCC’s broadband plan is critical for small business growth as well as America’s overall growth and competitiveness. At this point in time, WIPP recommends that the Commission move forward with full deployment of broadband and encourage innovation and private sector development.

Despite endorsing the vision and scope of the broadband plan, WIPP would like to share its reservations regarding the oversight and implementation process. First, WIPP is concerned about the FCC’s recent announcement to consider reclassifying the transmission component of broadband access services as a “telecommunications service” under Title II of the 1934 Telecommunications Act as amended in 1996. WIPP is concerned that the proposed reclassification, referred to as the “third way” approach, would impose additional regulations on broadband that would ultimately hinder investments, small business access, and the adoption of broadband. If this is the outcome, it would jeopardize the businesses of our members, resulting in increased prices and decreased flexibility. We fear that a heavy regulatory environment will

not be conducive to moving this initiative forward, and certainly the legal and political battles will cause undue and unnecessary delays and frustration.

Second, WIPP is concerned with the lack of participation and voice of women business owners in the FCC's deliberations, despite the fact that they are a powerful economic force. A recent survey commissioned by the National Women's Business Council found that the economic impact of this community is \$2.86 trillion and they employ sixteen (16) percent of the U.S. workforce. In fact, if women business owners were their own country, they would have the 5th largest GDP ahead of France, United Kingdom, and Italy. While the public comment period is open to us, we feel we are not considered important stakeholders, and thus miss the opportunity to participate in many of the closed-door meetings.

Third, at a time when this country needs job creators, we implore the Commission to refrain from any actions which would impede small business growth. Entrepreneurs are innovative, and rely on the latest technologies for their success. It is therefore critical that business owners in every part of the country have access to the latest broadband technologies. Connected Nation (Connected Nation, "The Economic Impact of Stimulating Broadband Nationally," February 21, 2008) reports that policies encouraging increased broadband adoption could help create or retain an additional 2.4 million jobs per year nationwide. A 2007 study by the Brookings Institution and MIT found that a one-digit increase in broadband penetration creates an additional 300,000 American jobs.

According to the 2010 Annual WIPP Survey, when asked about regulation of Internet traffic, more than half of the women business owner respondents preferred to see the private sector and government work together. In addition two-thirds of survey respondents believe that network providers should be able to manage their own network traffic. Also, seventy-seven (77) percent of respondents think the government should encourage private sector investment in broadband technology, while sixty-two (62) percent support incentives for public/private partnerships.

Broadband technology has become a vital tool for economic success. It creates jobs by making businesses more competitive and efficient. We must ensure these incentives remain in place for the private sector to continue its partnership with the public sector, delivering ubiquitous broadband across the country and continuing the current environment, which has allowed small businesses to thrive.

Sincerely,



Barbara Kasoff, President and CEO
Women Impacting Public Policy