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December 7, 2017

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Commissioners:

Community Transportation Association of the Northwest (CTANW) and the Washington State Transit Association (WSTA) members provide public and community transportation services to 90% of Washington State with more than 250 million boardings each year. We offer this letter of comment expressing our joint opposition to the proposed changes in the FCC's "net neutrality" rules, and we further call on the FCC to examine the impact this rule change would have on the following industries:

- Transportation – The nation's community and public transportation agencies are responsible for connecting people with employment, housing, social services, medical and mental health services, educational services, and the communities and economies in which they live and work. Yet, people connect with transportation service via the internet, phone applications and more. What safeguards are in place to ensure the nation's transportation system can continue to be innovative leaders in public access without driving up costs?
- Employers – Nearly all employers in the United States, including government agencies, rely on the internet to connect internally, and with their customers, clients, passengers and constituents. Would this proposal allow for a new increased costs to employers?
- Schools, colleges and educational institutions – More than ever, the internet has provided increased access to information and education in the form of online learning, webinars and teaching tutorials. Would this proposal allow for increased costs to students and school districts, as well as universities and community-based learning centers?
- Medical and mental health facilities – In efforts to reduce costs, improve quality of life, and maximize health outcomes, innovations such as telemedicine, online scheduling, and internet-based information have become mainstays in the field. Will this proposal drive up costs to patients and the medical and mental health care fields?
- Vulnerable populations – In the United States, people with lower income, people with disabilities, aging adults, veterans, and other vulnerable and disparately impacted communities have come to rely on the internet as a key form of communication and as a gateway to accessing information, services and communities. Would this proposal create



new burdens for already vulnerable populations throughout the states? What safeguards would be in place to protect and ensure these populations can continue to access information, social services, medical care and employment opportunities via the internet?

We believe the “net neutrality” rules proposed in 2015 recognized the internet has become a fundamental and indispensable component of the nation’s transportation, economic, health care, educational and employment sectors, and must be regulated at the national level to help prevent undue cost burdens, and ensure all people, including vulnerable populations, receive equitable access regardless of age, ability or income. These rules have protected the ability for all industries to be innovative. Yet, the proposed changes, without clarification, seem to threaten the ability for these advancements to be maintained.

For transportation agencies, the “net neutrality” rules have helped ensure riders and providers of transportation can access information freely and completely. The transportation industry in particular has been able to use the internet in ways that help to reduce costs to taxpayers, increase access to information and improve efficiencies in the system.

As the community and public transportation industry works to modernize their websites, their equipment on vehicles and further integrate with smart phones and applications, there is no doubt changes to this important rule would increase the potential to inhibit innovation, restrict access to customers with lower incomes who may not be able to afford surcharges and extra fees, and ultimately add cost to the providers of services.

We call on the FCC to vote down the proposed changes, and to strongly consider the important impacts changes to “net neutrality” would have on all sectors of the nation’s economic system, including transportation, employment, education, health care and government services, as well as the nation’s most vulnerable populations. If we can provide further information, please do not hesitate to contact us at anytime.

Sincerely,

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CC: Members of the Washington State Congressional Delegation