April 10, 2013

The Honorable Fred Upton  
Chairman, Committee on Energy and Commerce

The Honorable Henry Waxman  
Ranking Member, Committee on Energy and Commerce

The Honorable Greg Walden  
Chairman, Subcommittee on Communications and Technology

The Honorable Anna Eshoo  
Ranking Member, Subcommittee on Communications and Technology

US House of Representatives  
2125 RHOB  
Washington, DC 20515

Dear Chairmen Upton and Walden, and Ranking Members Eshoo and Waxman:

COMPTEL commends your leadership on delineating U.S. policy regarding global Internet governance. In addition, we support the underlying goal of the draft legislation to send a clear message to the international community that the multi-stakeholder model is the correct approach to maintain the structure of Internet governance and to protect the free flow of information and ideas. Last year’s passage of S. Con.Res 50 sent the correct message to international regulatory bodies that the treaty proposals at the World Conference on International Telecommunications (WCIT-12) represented the wrong approach to Internet governance. However, as the Subcommittee considers this new draft legislation that would affirm United States policy regarding Internet Governance, I would like to take this opportunity to raise a specific concern.

Should this draft bill become law, it is quite possible it could be misused in the U.S. to influence communications policy decisions that are unrelated to the Internet. Specifically, the so-called “IP transition” is part of a major undertaking at the Federal Communications Commission with a number of open proceedings to examine U.S. policy as the Public Switched Telephone Network (PSTN) evolves from Time Division Multiplexing (TDM) technology to Internet Protocol (IP) technology. At the center of this debate is the use of IP technology to deliver
advanced voice services to consumers and businesses. It is important to point out that although the word “Internet” is used in the name of the transmission technology, the technology itself is not the Internet. IP technology is used in managed networks throughout the country that deliver advanced voice services that never come in contact with the public Internet. Despite this factual distinction of what IP technology is, and is not, there are some that continue to perpetuate the myth that IP technology equals the Internet and could use this bill to skew the IP transition debate, as well as attempt to eliminate state and federal consumer protection and public safety regulations.

We would hope the Subcommittee would consider alternatives to the current policy statement that would continue to reflect the unanimous U.S. support for the multi-stakeholder model for Internet governance.

Again, thank you for your leadership on this very important issue.

Sincerely,

Jerry James
CEO