



**WRITERS GUILD
OF AMERICA WEST**

April 18, 2024

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L St. NE
Washington, DC 20554

The Honorable Brendan Carr
Commissioner
Federal Communications Commission
45 L St. NE
Washington, DC 20554

The Honorable Geoffrey Starks
Commissioner
Federal Communications Commission
45 L St. NE
Washington, DC 20554

The Honorable Nathan Simington
Commissioner
Federal Communications Commission
45 L St. NE
Washington, DC 20554

The Honorable Anna M. Gomez
Commissioner
Federal Communications Commission
45 L St. NE
Washington, DC 20554

Re: *Safeguarding the Securing the Open Internet, WC Docket No. 23-230*

Dear Chairwoman Rosenworcel, Commissioner Carr, Commission Starks, Commission Simington, and Commissioner Gomez:

The Writers Guild of America West (WGAW) strongly urges voting in favor of WC Docket No. 23-320, *In the Matter of Safeguarding and Securing the Open Internet*¹, at the Commission's upcoming Open Meeting on April 25th, 2024.

WGAW applauds the Chair's decision to put this long-awaited Order before the Commission, restoring the critical online consumer protections that were stripped by the previous Commission in 2017. WGAW has been a long-standing and ardent supporter of the open Internet and has advocated for strong open Internet protections in numerous proceedings before the Commission, including in our comments "In the Matter of Protecting and Promoting the Open Internet"

¹ Safeguarding and Securing the Open Internet, WC Docket 23-320, Declaratory Ruling, Report and Order, and Order on Reconsideration (2024). <https://docs.fcc.gov/public/attachments/DOC-401676A1.pdf>

(2014),² the proceeding which established strong Title II protections, and our comment “In the Matter of Restoring Internet Freedom” (2017),³ the subsequent proceeding that abandoned them.

WGAW strongly supports the Commission’s new proposed rules, which largely restore the nationwide protections for an open Internet established by the 2015 *Open Internet Order*. The new proposed Order correctly takes the approach of reclassifying broadband internet access service as a Title II telecommunications service, as well as the key bright-line rules prohibiting blocking, throttling, and paid prioritization, and a strong general conduct standard, which were the core of the 2015 Order, while making appropriate updates to reflect the realities of the current marketplace.

Restoring these protections is as necessary and relevant as ever. Streaming video has become the dominant market for content, and comprises a significant portion of all Internet traffic. The streaming video market is heavily consolidated and vertically integrated, and is vulnerable to interference from Internet providers. Without open Internet protections, viewers’ attention can be directed to the highest bidder, further threatening competition in the streaming market.

For too long the FCC, our nation’s expert agency on communications, has had negligible authority over the essential communications ecosystem of our time. The WGAW strongly supports the Commission’s commitment to truly restoring protections for a free and open Internet, and we urge all Commissioners to act in the public interest by voting to adopt the *Safeguard and Securing the Open Internet Order* on April 25th.

Sincerely,

/s/ Rachel Torres
Political and Legislative Director
Writers Guild of America West

/s/ Laura Blum-Smith
Research and Public Policy Director
Writers Guild of America West

cc: Narda Jones
Ramesh Nagarajen
Elizabeth Cuttner
Greg Watson
Lauren Garry

² Comments of the Writers Guild of America, West, GN Docket 14-28, July 15, 2014. Available at https://www.wga.org/uploadedFiles/news_and_events/public_policy/FCC-Comments-on-Revised-Open-Internet-Rules.pdf; Reply Comments of the Writers Guild of America, West, GN Docket 14-28, Sept. 16, 2014 Available at https://www.wga.org/uploadedFiles/news_and_events/public_policy/Net-Neutrality-Reply-Comments.pdf

³ Comments of the Writers Guild of American West, WC-Docket 10.108, July 17, 2017. Available at https://www.wga.org/uploadedfiles/news_and_events/public_policy/wgaw-comments-wc-docket-17-108.pdf

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