



Japanese American Citizens League

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March 31, 2010

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 09-191

Dear Chairman Genachowski and Commissioners:

Founded in 1929, the Japanese American Citizens League (JAACL) is the oldest and largest Asian American civil rights organization in the United States. The JAACL is committed to effecting positive social change for all Americans, particularly those in the Asian Pacific American community, by monitoring and responding to issues that enhance or threaten the civil and human rights of all Americans.

Broadband technology can be a crucial resource to individuals and organizations committed to affecting positive social change. From healthcare to civic engagement to distance learning, broadband technology changes the lives of those who have access to it. However, as the FCC has recognized, there are many communities that have been left out of this technological evolution, and in this time of economic hardship, it is even more important to equip these communities with the tools they need to overcome their circumstances.

Both the Obama Administration and the Commission have demonstrated a commendable commitment to expanding broadband deployment and adoption. The process for which the Commission solicited feedback for the National Broadband Plan was a perfect example of how government can and should work with the people it hopes to benefit. However, the JAACL is concerned that in the matter of the Open Internet NPRM, the Commission is overlooking the need to engage in similar public discourse.

In January, along with 22 other civil rights organizations, we reminded the Commission of our request to “include a framework to incorporate thoughtful analysis of how proposed net neutrality regulations would impact low-income, multilingual, minority, elderly and young Americans, as well as people with disabilities.” At this time, no such effort has been made.

One area of particular concern is the Commission’s effort to codify a principle of nondiscrimination. We understand and applaud the intent to prevent discrimination, but we remain unconvinced that there is a need for this type of regulation. Additionally, if the consequence of further regulation creates a disincentive for further investment and deployment of broadband, the rule will do more harm than good. Until the Commission discusses and addresses these concerns to the understanding and satisfaction of the communities who stand to benefit the most from broadband, we will continue to voice our concern and hope for a return to public discourse.

Sincerely,

A handwritten signature in black ink that reads "S. Floyd Mori". The signature is written in a cursive, flowing style.

S. Floyd Mori
JACL National Executive Director