**Released: April 27, 2017**

**CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU GUIDANCE ON FILING COMMENTS IN THE RESTORING INTERNET FREEDOM PROCEEDING**

**WC Docket No. 17-108**

With the opening of a new proceeding on Restoring Internet Freedom, the Commission anticipates significant public engagement and a high volume of filings. The Consumer and Governmental Affairs Bureau provides this guidance to facilitate public participation and to make commenting easy.

Those who wish to file individual comments may submit them electronically via the Electronic Comment Filing System (ECFS) at <https://www.fcc.gov/ecfs/>. However, we anticipate that some may wish to submit a large number of comments from multiple individuals, each with the same or similar content. We strongly encourage parties who seek to file a large number of comments or “group” comments to do so through the public API[[1]](#footnote-2) or the Commission’s electronic inbox established for this proceeding, called Restoring Internet Freedom Comments at <https://www.fcc.gov/restoring-internet-freedom-comments>.[[2]](#footnote-3) We also ask parties who anticipate submitting group comments to contact us in advance so that we can assist with a smooth filing process. You can reach us at [ECFSHelp@fcc.gov](mailto:ECFSHelp@fcc.gov) and (202) 418-0193.

We expect that filing group comments through the inbox will be simpler than filing through ECFS. We ask commenters to be patient, as there may be some lag time between when filings are made and when they appear in ECFS. We assure all timely filers, though, that their submissions will be part of the record in this proceeding.

By using the public API or inbox and contacting us in advance of large filings, parties can help us ensure that ECFS functions normally during periods of high volume submissions. Based on past experience, we anticipate that during some periods of the comment cycle, ECFS may experience much higher volumes of traffic, and that some of this traffic may be malicious in nature. Our commercial cloud service is limited in the amount of input it can receive at any one time.  Thus, if group filers do not wish to use the inbox above for group filings, we recommend that they use the ECFS function for a single file to be uploaded with the ability to note the number of individuals represented by the filing. This will minimize the possibility that the system will be overwhelmed and unable to take other filings.

We will continue to monitor ECFS and take steps to minimize any impacts on parties attempting to file and view comments. We appreciate the public’s help, as we want to ensure that all voices are heard in this proceeding.

We remind the public that the Commission’s ex parte rules apply and that presentations (including comments, filings, and other submissions) are subject to “permit-but-disclose” ex parte rules. *See, e.g.*, 47 CFR §§ 1.1206, 1.1200(a). Participants in this proceeding should familiarize themselves and comply with the Commission’s ex parte rules, including the general prohibition on presentations (written and oral) on matters that are listed on the Commission’s Sunshine Agenda, which is typically released a week prior to a Commission meeting. *See* 47 CFR §§ 1.1200(a), 1.1203.

**ACCESSIBLE FORMATS:**  To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice) or 202-418-0432 (TTY).

1. The Public API enables automated submission of standard and express filings. Instructions for using the API can be found at <https://www.fcc.gov/ecfs/public-api-docs.html>. [↑](#footnote-ref-2)
2. Parties using this inbox should be aware that, just as with filings made in ECFS, all information submitted, including names and addresses, will be publicly available via the web. [↑](#footnote-ref-3)