

December 9, 2015



President Michael Picker
Commissioner Mike Florio
Commissioner Carla J. Peterman
Commissioner Liane M. Randolph
Commissioner Catherine J.K. Sandoval

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: I.15-11-007 Competition Investigation

Dear Commissioners:

The California Public Utilities Commission's newly opened "competition investigation" is an ill-conceived solution in search of a problem that will harm and distract California's innovation economy by charting a heavily regulatory course in direct conflict with the laws and policies set by the Governor, the Legislature, the federal government, and the CPUC itself. Allowing the CPUC to continue on such a course will serve only to create a tremendous amount of uncertainty, expend a tremendous amount of state and private resources, and put much-needed investments and continued progress in jeopardy. This is the wrong path forward for California.

California is experiencing a period of tremendous growth in innovation, which is fostering unprecedented infrastructure investment, job creation and an explosion of digital opportunity statewide. With technology hubs across the state, California leads the nation in technology employment, growth and wages, serving as a role model for other states.

This has been possible, in large part, through California's longstanding policy to regulate its thriving communications, technology and Internet markets with a light touch. **The CPUC's recent decision to open a searching competition investigation is a significant departure from this very successful policy and promises to place heavy burdens on the very innovators driving the growth in this vital sector.**

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The CPUC released this “ratesetting” proceeding following a closed door meeting and without any advance notice or input from the parties. It calls for an overreaching study of everything but the kitchen sink, including a host of technologies, subjects, and an arbitrary selection of parties that are completely outside its influence and jurisdiction. These issues include spectrum allocation and wireless market entry, broadband regulation and broadband antitrust issues, satellite transmission and the use of white space, and data caps. It sets the stage for legal and policy challenges that will take years to litigate and resolve.

On behalf of communications, technology, Internet companies and the business community, we urge the Commission to re-think the need for this investigation and instead stay on the path that has kept California moving forward and allow the successful policies that have driven so much growth and opportunity to continue.

Sincerely,



John Doherty
Vice President and General Counsel
TechNet



Peter Leroe-Muñoz
Vice President
Technology & Innovation Policy
Silicon Valley Leadership Group



Carolyn McIntyre
President
California Cable & Telecommunications Association



Ken McNeely
President
AT&T California

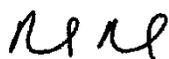


Jonathan Spalter
Chairman
Mobile Future



Jake Ward
President and CEO
Application Developers Alliance

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California Retailers Association



Jonathan Zuck
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The App Association



Jim Wunderman
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Kelly McKechnie Hitt
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Computing Technology Industry Association
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Jeanne Cain
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