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May 27, 2016

Submitted via FCC's Electronic Comment Filing System (ECFS)

The Honorable Thomas Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20054

*RE: Protecting the Privacy of Customers of Broadband and Other Telecommunications Services, WC Docket No. 16-106*

Dear Chairman Wheeler,

On behalf of the more than 14,000 members of the National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, I write to express the concern our industry has with recent actions by the Federal Communications Commission (FCC) to impose unnecessary regulations that will stifle future investment and lead to decreased innovation in our sector.

The growth of faster and more capable wireless and wireline high speed broadband networks, which has been fueled over the past 20 years by a sensible policy toward government regulation, has transformed the way the manufacturing industry operates and has contributed significantly to the growth of our sector in the United States. Our nation's telecommunications infrastructure has helped our shop floors become some of the most highly sophisticated and connected environments in the world.

The proposed rulemaking has the stated intent to protect the privacy of customers of broadband and other telecommunications services at a time when all companies are already subject to a robust privacy protection regime currently enforced by the Federal Trade Commission (FTC). Creating a new and duplicative regulatory regime at a time when a consistent regulatory framework across the entire internet ecosystem is needed will lead to an undue burden on our nation's telecommunications providers. It will take away critical resources that would otherwise be applied to further investment in our nation's broadband infrastructure on which manufacturers depend to fuel their innovation pipeline.

Manufacturers recognize that respecting and safeguarding privacy builds consumer confidence in new and innovative technologies and services. As a result, industry's best practices in the proper handling of data are constantly adapting and evolving to address new threats. Government mandates as to specific tools, technologies, or processes to be used can hold back innovation by freezing today's state-of-the-art in place, where it can become quickly outdated.

*Leading Innovation. Creating Opportunity. Pursuing Progress.*

Leveraging the Internet and connected technology has led to groundbreaking innovations in our products and processes. Our nation's manufacturers cannot afford a new, unnecessary regulatory scheme that puts at risk our lead in the race for new and innovative technologies that have the potential to transform our economy and create jobs.

*Comments Submitted by:*

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