



**WRITERS
GUILD OF
AMERICA, WEST**

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 Deputy: PUBLIC

June 9, 2015

Innovation, Technology and General Services Committee
 Los Angeles City Council
 City Hall—200 N. Spring St.
 Los Angeles, CA 90012

Re: Writers Guild of America, West Remarks in Support of CityLinkLA

Councilmembers Blumenfield, Bonin and O'Farrell,

The Writers Guild of America, West submits this letter in support of CityLinkLA and the RFP currently before the Innovation, Technology and General Services Committee.

The Writers Guild is a labor organization representing 8,000 professional writers, 3,600 of whom live in the City of LA, where WGA is headquartered. Our members are the creators of feature films, television series and, increasingly, online video content such as Amazon's *Transparent* and Hulu's *East Los High*, both of which film locally.

Affordable, high-speed broadband service is necessary for Los Angeles to maintain its role as the entertainment capital for the next generation of content creators.

For our members and many others who work in the entertainment industry, the Internet has introduced new creative and economic opportunities, making space for diverse and independent programming. After decades of consolidation among networks, studios, and distributors, the Internet has enabled new competition from online video services like Netflix and Amazon, both of which are making significant investment in original programming. A fast, affordable and open connection between consumers and edge providers is necessary to continue this progress.

With the latest wave of consolidation in the distribution industry, beginning with Comcast-Time Warner Cable, then AT&T-DirecTV and now, most recently, with Charter's proposed acquisition of Time Warner Cable, it's critical that the city take control of its broadband future. That is why the Guild supports this plan and especially the following provisions of the RFP:

- Standalone, gigabit broadband service offered at or around a \$70 price point.
- Free wifi delivered at a minimum speed of 5mbps.
- Equitable network deployment ensuring that high-speed broadband is available to all residents, regardless of income or neighborhood.
- And finally, the city's commitment to, and continued leadership on, net neutrality. This is especially critical because Internet service providers have already begun to challenge

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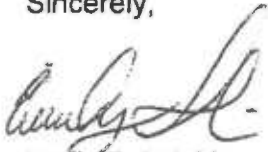
the FCC's new rules and the city must make sure that CityLinkLA adheres to net neutrality principles.

In addition, the assessment of proposals with preference for those that encourage wifi and wireline competition is vital. There is little competition in the broadband market and very few options at the 25 mbps benchmark. Nationally, the FCC reports that 25% of homes are served by more than one provider at 25 Mbps, while in Los Angeles County only 29% of residents have a choice of providers at this speed. To further support broadband competition in the city, we ask the Committee and ITA to consider awarding additional points to proposals that include wholesale access for competing providers. Historically there has been very little overbuilding of cable or Internet service and last mile unbundling could increase competition in the consumer broadband market.

Finally, we ask that the CityLinkLA contract prohibit paid interconnection agreements on public property. The FCC has not yet established bright-line rules on interconnection and paid arrangements may unfairly raise operating costs for edge providers, undermining online video services and other data-intensive applications.

The Writers Guild of America, West strongly supports CityLinkLA and we believe it will advance our community and local economy in meaningful ways. WGAW thanks the Committee, City Council and Information Technology Agency for their work to bring gigabit broadband service to Los Angeles.

Sincerely,



Emily Sokolski
Senior Research and Policy Analyst



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Senior Director of Research and Public Policy

Providers Offering 25 Mbps or Higher

