June Data Analysis of FCC Docket 17-108, Restoring Internet Freedom

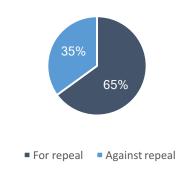
With recent news reports surrounding the status and substance of the public record in the FCC's *Restoring Internet Freedom* docket (17-108), we looked at the nearly five million comments submitted to get a better sense of where the record stands. The issues presented in this FCC proceeding in particular have served as a point of contentious back and forth for too long, and the implications of the underlying framework for broadband regulation are critical to the future of our nation's internet evolution and expansion and the consumer experience.

We looked at the comments posted to the public docket through the FCC's API in order to produce a data-driven assessment of the 4,990,000 total filings as of June 20, 2017*. We plan to do similar assessments around key milestones in the proceeding, including the comment deadline on July 17.

The findings below are simply meant to provide one way of looking at the data in the record.

Overall Sentiment of Comments

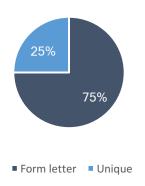
Of the total comments in the docket, approximately 65% (3,237,916) support repealing the 2015 Open Internet Order and roughly 35% (1,752,084) oppose the proposed repeal. The sentiment was determined based on the clear language indicated in the form letters we tracked on both sides of the debate, which comprise the majority of the docket. We also used key terms indicating <u>support for</u> or <u>against</u> the current Title II-based rules based, including the language encouraged by John Oliver.



Methodology: We identified form letters by sorting large batches of comments to find groupings of comments with similar language. Then we scored each form letter as "supporting repeal" and "opposing repeal." Within each form letter we identified unique phrases, then used these phrases to query all of the comments to find the number of comments containing the same language. This allowed to score 75% of all the comments in the docket as either "supporting" or "opposing" repeal. For the remaining 25% of the comments, we queried the non-form letters for specific phrases indicating support or opposition. We also manually reviewed large batches of the non-form letter comments. Taken together we developed a percentage model for the remaining non-form letters as "supporting" or "opposing." We verified our model by manually reviewing large batches of comments.

Form Letter-Generated Comments

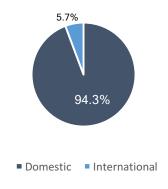
Approximately 75% of the docket is comprised of comments driven by 19 known form letters we tracked. These 19 comment campaigns are both for and against repeal of the 2015 rules. Here are two examples of a <u>pro-repeal form letter</u> and an <u>anti-repeal form letter</u> that are currently in the docket.



Methodology: Form letters were identified by sorting large batches of comments to find groupings of comments with similar language. Within each form letter we identified unique phrases, then used these phrases to query the all of the comments to find the number of comments containing the same language. Some form letters had multiple variations and wording adjustments, we attempted to identify all of the variety and permutations of the form letters, but there are most likely more in the data, so our number above is likely on the conservative side.

Foreign Filings

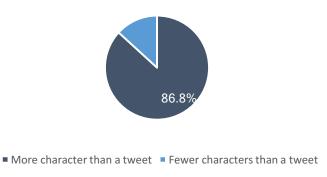
More than a quarter of a million filings came from <u>international filers</u>. At least 288,611 comments were filed from foreign entities, which is roughly 5.7% of the total filings. The vast majority of these, 288,492 to be exact, were against repeal. One caveat is that the actual number of foreign filings could likely be higher, as this number is based on those filings that voluntarily selected the box marking them as an international filer.



Methodology - Comment filers can self-identify as an international filer. We compiled the total international filings by querying all of the self-identified international filers.

Length: 140 Characters or less

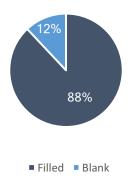
Over 13.2% of comments filed are the length of a tweet or shorter.



Methodology - We ran a character limit query on all the comments to identify the comments having less 140 characters.

Blank Physical Addresses

Roughly 12% of commenters left the physical address blank. While the FCC requires a physical address, 603,356 comments do not provide this information.



Methodology - We ran a query for Null addresses in the database to count the number of blank addresses.

^{*}Filings are posted every day, so this assessment is based off of the data that was in the docket as of June 20, acknowledging that in the days following June 20, additional comments have been posted.