

economists Hal Singer and Robert Litan, from the Phoenix Center for Advanced Legal & Economic Public Policy Studies and from other sources. These submissions include several academic papers that explore in detail many of the complex legal and economic questions raised in the Commission's NPRM. Below is a listing of those documents, organized by topic. For the Commission's convenience, DPI is attaching a brief synopsis of each paper, organized by topic, as well as the documents themselves, organized by topic.

Legal Scholarship of Interest

- Lawrence J. Spiwak, *USTelecom and its Aftermath*, Phoenix Center Policy Bulletin No. 42 (June 2017).
- George S. Ford and Lawrence J. Spiwak, *Tariffing Internet Termination: Pricing Implications of Classifying Broadband as a Title II Telecommunications Service*, 67 *Federal Communications Law Journal* 1 (2015).
- Lawrence J. Spiwak, *What Are the Bounds of the FCC's Authority over Broadband Service Providers?—A Review of the Recent Case Law*, 18 *Journal of Internet Law* 1 (2015).

Economic Scholarship of Interest

- Robert Litan and Hal Singer, Progressive Policy Institute Policy Brief, *Outdated Regulations Will Make Consumers Pay More for Broadband*, (December 2014) (This paper is submitted as a separate PDF document.)

- George S. Ford and Michael Stern, Phoenix Center Policy Perspective No. 10-02, *Sabotaging Content Competition: Do Proposed Net Neutrality Regulations Promote Exclusion?* (March 4, 2010).
- George S. Ford, Phoenix Center Policy Perspective No. 17-03, *Net Neutrality, Reclassification and Investment: A Further Analysis* (May 16, 2017).
- George S. Ford, Phoenix Center Policy Perspective No. 17-05, *“Regulatory Revival” and Employment in Telecommunications* (June 12, 2017).
- George S. Ford, Phoenix Center Policy Perspective No. 17-08, *Reclassification and Investment: A Statistical Look at the 2016 Data* (July 13, 2017).
- George S. Ford, Phoenix Center Policy Perspective No. 17-04, *Reclassification and Investment: An Analysis of Free Press’ “It’s Working” Report* (May 22, 2017).
- George S. Ford, Phoenix Center Policy Perspective No. 17-06, *Below the Belt: A Review of Free Press and the Internet Association’s Investment Claims* (June 20, 2017).
- George S. Ford, Phoenix Center Policy Perspective No. 17-07, *Broadband Speeds Post-Reclassification: An Empirical Approach* (June 27, 2017).
- George S. Ford, *Bait-and-Switch-Or Why the FCC's 'Virtuous Circle' Theory is Nonsense*, BLOOMBERG BNA (May 18, 2015).
- T. Randolph Beard, George S. Ford and Hyeongwoo Kim, *Capital Investment and Employment in the Information Sector*, 38 TELECOMMUNICATIONS POLICY 371 (2014).

DPI appreciates this opportunity to expand the record in this proceeding. We trust the material we are providing today will help guide the Commission as the agency makes an economically-sound and legally-sound decision.

Respectfully submitted,

/s/ Barry D. Umansky
Barry D. Umansky, J.D.
Senior Fellow and Senior Policy Advisor

Digital Policy Institute
Ball State University
Muncie, Indiana 47306
(765) 717-4928

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