

**DISSENTING STATEMENT OF  
COMMISSIONER MIGNON L. CLYBURN**

Re: *Establishment of the Office of Economics and Analytics*, MD Docket No. 18-3.

By establishing an Office of Economics and Analytics within the FCC, one might conclude that the Commission is laser-focused on integrating neutral economic analysis into the work of this agency. But what the current Administration is actually doing, is putting in place a mechanism to justify its own interests, while disregarding any analysis that runs counter to their views.

For example, where was the balanced, detailed economic analysis on the impact to edge providers, small businesses, and consumers when the FCC majority gutted net neutrality protections last month? What about the analysis the FCC majority relied on, when they deregulated the \$45 billion business data services market? And the recently adopted order authorizing use of the Next Gen TV standard? Where was the enhanced, deep analysis there? These orders represent three colossal market changing shifts, that were devoid of any cost-benefit analysis, weighing the costs to consumers – both in the loss of services and access costs – against their flimsily philosophical, touted benefits. And where, pray tell, in this three-page Order, is the detailed economic cost/benefit analysis that justifies reshuffling economists from their current positions within the various Bureaus and Offices to this new Office of Economics and Analytics?

Will the creation of an office dedicated to economics lead us to look more closely at the economic impact of our actions on consumers and small businesses? We are only left to guess due to... the lack of analysis in the draft. As the late Carlos Diaz-Alejandro, the most prominent Latin American economist of his generation, once said: “any [economics] graduate student can come up with any policy conclusion he desires, by building appropriate assumptions into his model.” My sense, is the majority will continue to mix and bake this deregulatory feeding frenzy, with the new Office serving as icing on the cake. All the while, disrupting existing staff relationships, pulling employees from their current bureaus where they have established subject matter specific expertise, and plunking them down in a newly created bureaucratic structure.

A long time has passed since my days in Dr. Ferri’s Economics class, but what I learned then is light years away from what is being applied now, when it comes to critical rulemakings, transactions, auctions, adjudications and other relevant matters. If past is prologue, the next 12 months of this Administration – even with new offices, reconstituted titles and reshuffled staff – will be just like the last. New design. Self-serving results. I dissent.