New Member Spotlight: Tejas Narechania Advocates for Tech Governance Through Public Comments

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In 2023, Big Tech took center stage, igniting public discourse and prompting policy debates around topics like artificial intelligence (AI) and social media. 2024 is likely to follow a similar trajectory as these technologies become ever more entwined in Americans' daily lives.

For much of his career, Professor Tejas Narechania has sought to understand and explain this technology landscape with his research and public engagement efforts. A Professor of Law at the University of California, Berkeley, Narechania researches the regulation and governance of technology. He examines the benefits and risks of concentrated market power in technological industries and explores how public policy can shape these markets for societal improvement.

In June 2023, Narechania and Berkeley colleague Nick Merrill co-authored a public comment addressing a request from the Federal Trade Commission (FTC), an agency whose mission is to protect competition and consumers. The FTC's request was in regards to the business practices of cloud computing providers that could pose risks to competition and data security. Cloud computing is the on-demand internet delivery of services like storage, software, servers, and databases.

Narechania and Merrill's comment served as their Scholars Strategy Network membership contribution and it stemmed from prior research on a sector of the cloud computing industry.

"I think it's quite natural to take some of that work, and try to bring it to the attention of policymakers so that they can hopefully make changes that are responsive to the findings that I'm uncovering," said Narechania.

In Narechania and Merrill's research, they examined the market of Content Delivery Networks (CDN's), cloud computing services that speed up the delivery of web content by placing servers geographically closer to end users. CDN's are hugely important to the way the modern internet operates. Their findings revealed surprising concentrations within the CDN market: 99.9% of the top 10,000 websites use a CDN, with Cloudflare, Fastly, and Amazon delivering service to 95.6% of that piece of the market. Of these providers, Cloudflare delivers services to over 75% of the whole market.

In their comment, they highlighted that although this concentration in the CDN market may enhance internet performance and reliability, it brings trade offs like potential choice limitations and the stifling of innovation. They also underscored cybersecurity risks: a cyberattack on a major CDN provider could cause widespread outages affecting consumers, businesses, and even national security.

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Narechania and Merrill also offered solutions to address these risks and others, stressing the need for further government investigation into the sector. With this public comment, Narechania and Merrill are helping the FTC gain insights into how to regulate this pivotal aspect of the cloud computing market, which has predominantly operated under private industry control—all with research they had already conducted.

Narechania is deeply familiar with public comment work and actively seeks these opportunities at agencies like the FTC and Federal Communications Commission (FCC). He views public comments as a vehicle to elicit change.

> "I think public comments are a really good vehicle for getting larger attention on your work," said Narechania. "That is, you spend the time to produce this research output and sometimes, as academics, we are not sure what will happen to it and what the afterlife will be of that research product. And I think public comment opportunities are a really good way to try to highlight the work that you've done, bring it to a larger audience, and especially, bring it to an audience that is likely to care about the work and do something about it."

And public comments aren't the only tool Narechania uses to spread awareness about the issues he studies. In January 2024, he and a colleague, Ganesh Sitaraman from Vanderbilt University, co-authored an OpEd published in *Politico* on the need for regulation in the AI market to prevent Big Tech from stifling competition. The topic was informed by their working paper on the risks of concentration in the AI sector. "We wanted to find a way to bring that work to an audience that would care about it," said Narechania. "And an OpEd was a way to do that."

Looking forward, Narechania plans to continue to translate his academic findings for a policy audience, and he's committed to doing so.

> "I'm an academic first and foremost, and it's very important to me that I continue to produce good, high quality, rigorous academic work," said Narechania. "But I think it's also really important to me that that work makes a difference and I think that OpEds and policy advocacy, like public comments, are ways to give that academic work more and broader meaning."