



April 2, 2024

Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**RE: *Ex Parte* Presentation from EducationSuperHighway on *Improving Competitive Broadband Access to Multiple Tenant Environments*, GN Docket No. 17-142**

EducationSuperHighway recently met with the Wireline Competition Bureau regarding the forthcoming Notice of Proposed Rulemaking regarding bulk billing in multiple tenant environments. It is our position that bulk billing ultimately *benefits* tenant consumers, increases market competitiveness for broadband coverage, and provides an easier consumer experience. To that end, EducationSuperHighway presented on the following:

1. ESH estimates that 4 million households living in MDUs lack internet access due to affordability challenges.
2. For the past 3 years, ESH has been working with local jurisdictions and state broadband offices to bring connectivity solutions to bear in affordable multifamily housing.
3. The ability of a building owner to negotiate bulk billing arrangements with Internet Service Providers (ISPs) and Managed Service Providers (MSPs) enables competitive options such as managed Wi-Fi.
4. The availability of these competitive options leads to lower prices, better service quality, and higher internet adoption amongst residents in affordable multifamily housing.

EducationSuperHighway recommends withdrawal of the rulemaking or a delay in its consideration to allow the FCC more time to gather evidence and information on bulk billing practices within multiple tenant environments in order to assess the direct impact of proposals to ban the practice. A proposed rule to ban bulk billing takes a pre-emptive conclusion to the issue before stakeholders are able to rebut this presumption.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.

Sincerely,

/s/

Evan Marwell  
Founder & CEO  
EducationSuperHighway

Slides attached.

Cc: Adam Copeland  
Michele Berlove  
Jesse Goodwin  
Jodie May