

April 26, 2024

The Honorable Jessica Rosenworcel
The Honorable Brendan Carr
The Honorable Geoffrey Starks
The Honorable Nathan Simington
The Honorable Anna Gomez
Federal Communications Commission
45 L Street, Northeast
Washington, DC 20554

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

Dear Chairwoman Rosenworcel and Commissioners Carr, Starks, Simington, and Gomez:

ALLvanza is dedicated to ensuring that Latino and other underserved communities have access to the tools they need to share in the benefits and opportunities provided by technological innovation. For years, ALLvanza has advocated for policies that can promote access to robust and affordable broadband service, which has become essential to participate fully in our society and economy. We have made progress in expanding broadband access to underserved communities, and we are troubled by the possibility that the Commission will undermine that progress by considering the elimination of bulk billing arrangements. We respectfully urge the Commission to abandon this effort.

People in underserved communities frequently face challenges in affording homeownership, leading many to opt for renting instead. Tenants rely on the owners and managers of multi-dwelling units (MDUs) to make essential services like broadband access available. However, due to the economic challenges of serving buildings, especially those with lower-income residents, many MDUs have struggled to attract broadband providers willing to deploy new infrastructure and offer quality service at affordable prices. MDU owners and managers have frequently overcome those challenges through bulk billing arrangements.

Over the past decade, housing authorities and other government agencies that oversee public and affordable housing also have increasingly turned to bulk billing arrangements to ensure that underserved communities have access to broadband. In many cities, consumers can get discounted or free services through programs that rely upon bulk billing arrangements with local service providers.

Bulk billing is based on a simple economic concept: combine the buying power of a large group of consumers to get the best deal. Bulk billing can bring customers new investments in their buildings, greater performance, more responsive consumer service, and substantially lower prices, which has become even more important with the imminent end of the Affordable Connectivity Program (ACP).

If bulk billing is banned, underserved communities could be trapped with service providers who have no financial incentive to make additional investments or to maintain low rates. Broadband


prices could rise dramatically for people in MDUs if providers no longer have the assurance of a revenue stream that allows them to offer the service at lower prices for each customer. People living in these communities could simply find service unaffordable and stop subscribing. Others who want to subscribe could find that they cannot pass credit checks or qualify for service.

With so much at stake, diluting the power of underserved communities to work in concert to purchase broadband service is counterproductive. While we favor consumer choice generally, the economics of serving MDUs without bulk billing would make it harder to attract providers, leaving consumers with far fewer benefits than bulk billing arrangements can bring.

The Commission should not undermine hard-won progress in expanding broadband access. Even issuing a rulemaking asking whether to adopt a bulk billing ban could inflict real harm, as stakeholders would likely limit or even freeze their activities while the Commission proceeding was underway. We, therefore, urge the Commission to recognize that bulk billing is critical for underserved communities to connect to essential online services and withdraw its rulemaking proposal from consideration.

Instead, the Commission should focus on other ways to promote broadband access and affordability following the end of the ACP, and ALLvanza stands ready to join the FCC in that effort.

Best,
Rosa Mendoza


Founder, President and CEO, ALLvanza