

April 26, 2024

The Honorable Jessica Rosenworcel
Federal Communications Commission
45 L Street NE
Washington, DC 20544

Dear Chairwoman Rosenworcel:

On behalf of the Council of Large Public Housing Authorities (CLPHA), I am writing to express our concerns about the Federal Communication Commission's (FCC) proposal to eliminate internet bulk billing arrangements in apartments, condominiums, public housing, and other multi-tenant buildings.

CLPHA is a non-profit organization that works to preserve and improve public and federally assisted affordable housing through advocacy, research, policy analysis, and public education. Our membership of more than eighty large public housing authorities ("PHAs") own and manage nearly half of the units in the nation's public housing program, administer more than a quarter of the subsidies in the Housing Choice Voucher (HCV) Program, and operate a wide array of other housing programs. CLPHA supports the nation's largest and most innovative PHAs that own and manage housing and vouchers for nearly 3.3 million households by advocating for the resources they need to solve local housing challenges.

As our society's reliance on technology continues to grow, the disparity between those with and without internet connection disproportionately affects our lowest-income households including people of color, older adults, and persons with disabilities. Public housing authorities are crucial to narrowing the digital divide since they house and serve the lowest-income households in our country. Because of bulk billing arrangements, CLPHA members can subsidize the cost of internet or offer affordable rates to residents living in public housing units. Several CLPHA-member PHAs that engage in bulk billing actually pay the entire cost of the internet service which allows their low-income residents to receive this service without cost to them.

Eliminating bulk billing arrangements would affect public housing residents who rely on this service to maintain their internet connectivity. While we understand there are concerns with bulk billing, wholesale elimination of bulk billing would precipitate unintended consequences by having a negative effect on low-income residents. The FCC's proposal will widen the digital gap, especially as the Affordable Connectivity Program, which many PHAs and their residents relied upon, ends. CLPHA asks the FCC to reevaluate their proposal and consider exempting owners of federally assisted affordable housing properties and public housing authorities.

Moreover, CLPHA requests that the FCC work with federally assisted affordable housing providers to understand and ameliorate the possible impacts on residents by eliminating bulk billing agreements.

Thank you for considering our request and I look forward to working with you on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Sunia Zaterman". The signature is written in black ink and has a fluid, connected style.

Sunia Zaterman
Executive Director

CC:

Commissioner Brendan Carr
Commissioner Geoffrey Starks
Commissioner Nathan Simington
Commissioner Anna M. Gomez