

NHCOA

NATIONAL HISPANIC COUNCIL ON AGING

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:

For over fifty years, the National Hispanic Council on Aging (NHCOA), has worked to improve the lives of Hispanic older adults, their families, and caregivers. Among our priorities is a commitment to ensure equitable access to the spectrum of services and lifelong needs of diverse older adults, and to provide adequate resources that enable them to age in a place of their choice, within age-friendly communities.

Having access to quality broadband service at affordable prices is very important to the older individuals we represent, and to the Diverse Elders Coalition (DEC), who has represented six national organizations¹ and millions of older racially and ethnically diverse people -- American Indians and Alaska Natives; and lesbian, gay, bisexual and transgender (LGBT) people. Access to such quality broadband service enables the DEC to advocate for policies and programmatic solutions that improve aging in our communities, and so we write to you today to urge you to refrain from adopting – or even considering -- a ban on bulk billing arrangements. As the Federal Communications Commission (“FCC”) has rightfully determined, broadband is an essential service. It is clear that having affordable access is fundamental for older adults to have connectivity to vital healthcare, social, educational, and other online services so that they can age comfortably, and with dignity, in their communities. In numerous communities where older adults reside, acquiring high-quality, reliable broadband at affordable rates poses a challenge. To address this, these communities have leveraged their residents' purchasing power to establish bulk billing arrangements with providers that deliver superior broadband

¹ National Asian Pacific Center on Aging; National Caucus and Center on Black Aging; National Hispanic Council on Aging; National Indian Council on Aging; Sage Advocacy and Services for LGBT Elders; Southeast Asia Resource Action Center.



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and customer service at reduced prices. Prohibiting bulk billing would effectively end a critical lifeline for so many.

The older people who the DEC represent live in seniors' communities, assisted living facilities, nursing homes, and in other group complexes tailored to their unique needs. They often have limited or fixed-incomes, and many are not digitally literate. It is especially challenging for many of them to conduct research on broadband offerings, and sign up for service that meets their needs and is still within their price range. The process itself serves as a deterrent to adoption for many. Yet, by banding together and entering into a bulk billing arrangement, either on their own or facilitated by their residence, they can receive competitive bids from broadband providers. These providers not only offer the necessary capabilities at favorable prices but can also deliver customer service tailored to the community's needs. Furthermore, older residents find comfort in knowing that when moving into or out of a residence, they will not be burdened with installing or uninstalling services and equipment. All of this enables older individuals to focus on what is most important: connecting online with their families and communities, and to important services and information, all of which allows them to age in-place.

If the FCC were to ban bulk billing, all the benefits derived from these arrangements would vanish. Those currently enjoying the advantages of bulk billing would pay more for services. For those unable to afford these higher prices, they would lose a critical tool for their well-being. Additionally, residents in communities with limited-service provider options would face challenges attracting new providers to compete. None of these outcomes serve the best interests of older individuals, their families, or their communities.

The FCC thus should reverse course and not initiate a rulemaking to ban bulk billing arrangements. Older individuals would be distressed by the mere consideration by the FCC of a proposal that would increase their monthly expenses or cause them to stop service. Instead, we recommend the FCC focus on real affordability problems, so all Americans can be connected to essential online services and resources.

Sincerely,

Yanira Cruz, DrPH, MPH
President & CEO

&

the Diverse Elders Coalition (DEC) Members:



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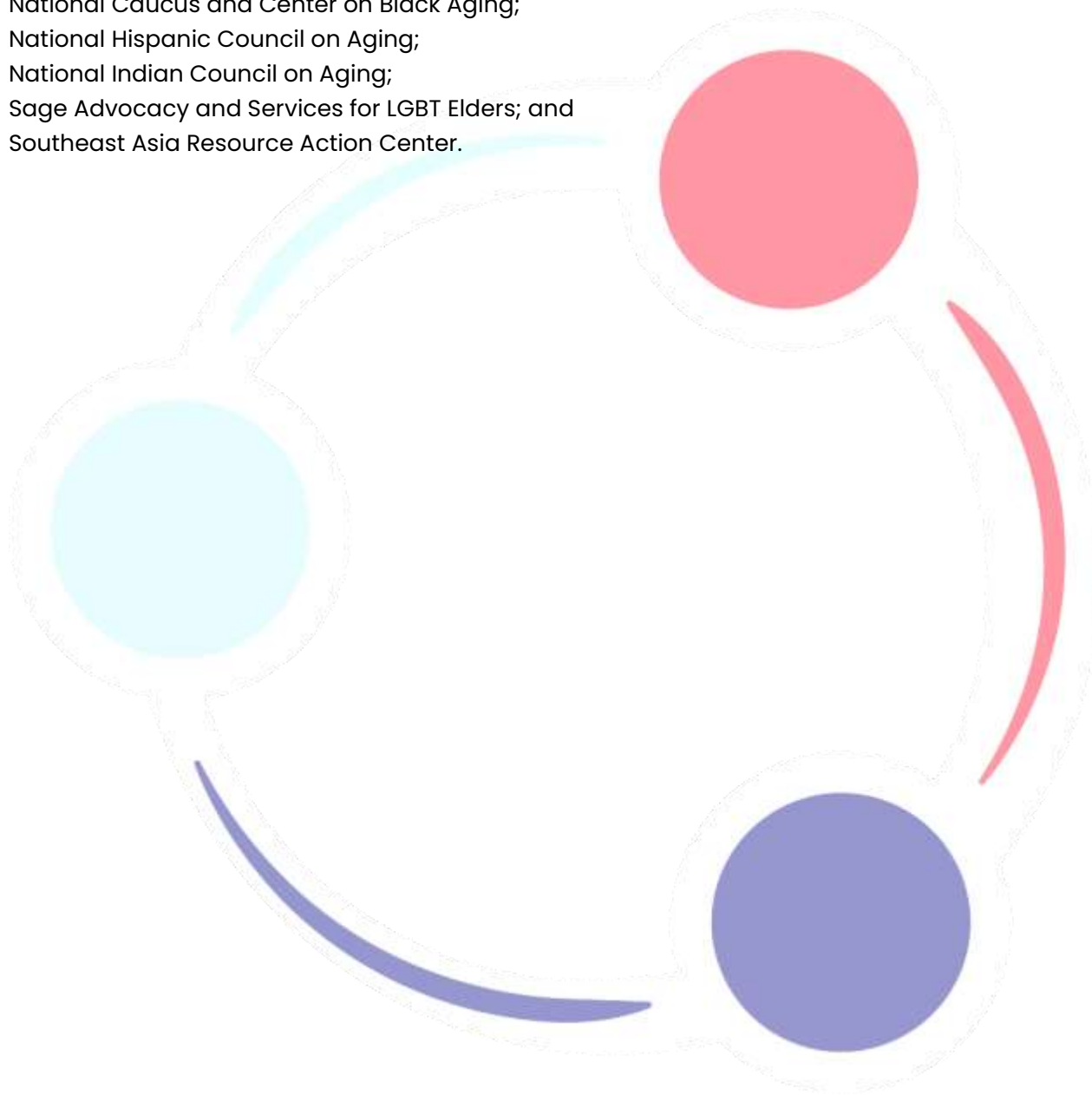


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