

April 29, 2024

Via Electronic Filing

Ms. Marlene H. Dortch  
Secretary Federal Communications Commission  
45 L Street, NE Washington, DC 20554

Re: *Improving Competitive Broadband Access to Multiple Tenant Environments*, WT Docket  
No. 17-142

Dear Ms. Dortch:

I represent UTOPIA Fiber, a pivotal player in the deployment of the open access municipal fiber landscape, and we can offer a unique perspective on the practice known as “bulk billing” in multi-tenant environments (MTEs). In brief, we favor bulk billing arrangements because they advance broadband deployment and digital equity and urge the Federal Communications Commission (FCC) not to prohibit them.

While I recognize that the FCC’s *Improving Competitive Broadband Access in Multiple Tenant Environments* further rulemaking proposal now on circulation reflects an effort to promote competition, consumer protection and choice, it will not result in these beneficial regulatory outcomes.

As a leader in digital equity, UTOPIA Fiber has significantly expanded access to broadband, while fostering economic growth, innovation, and competition in the space. UTOPIA Fiber has direct experience in the different ways bulk billing enables and even encourages broadband deployment in MTEs.

Although seemingly counter intuitive, in our experience, bulk billing arrangements are a valuable tool for providing access to broadband and expanding digital equity. Bulk billing arrangements:

- Allow landlords to negotiate with broadband providers for lower cost.
- Result in a more efficient and effective installation methodology.
- Give residents an opportunity to access infrastructure they may not otherwise be able to access.
- Serve seniors and low-income individuals better by keeping recurring monthly costs low.

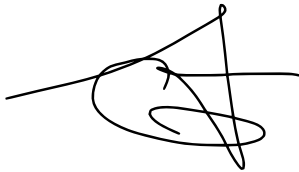
For many communities, bulk billing represents a unique method to provide affordable broadband access. Eliminating this possibility may unintentionally increase existing disparities in broadband access, which would further marginalize those who are already falling behind in the digital divide.

As broadband deployment experts, we have seen bulk billing provide an incentive to build where deployment may not have otherwise been economical or beneficial. Should the FCC prohibit bulk billing, investments in difficult to build areas may be stymied. In our direct experience, these arrangements provide the predictability needed to expand into more challenging areas. Without them, deployment can be drastically delayed in underserved areas—leaving Americans without reliable and competitive broadband options.

If the FCC moves forward with this proposed rulemaking, it is imperative that it not undo the benefits of bulk billing. Providing digital equity should remain central to the FCC's regulatory agenda.

Thank you for considering my experience and comments on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberly McKinley', with a stylized flourish at the end.

Kimberly McKinley  
Deputy Director / CMO  
UTOPIA Fiber