

June 4, 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

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

I represent the Board of Directors of the homeowner's association of Lazy River Village, a 55+ community with 356 homes in Sarasota County, Florida. We just heard that the Federal Communications Commission (FCC) may regulate bulk billing arrangements for the provision of communications services. As a community with such an arrangement, we oppose such an action. Our bulk arrangement offers significant benefits for our residents, many of whom live on fixed incomes, and imposing new rules on these arrangements would harm them enormously.

While Lazy River Village is a somewhat smaller community, we can offer a wide variety of amenities for our residents, including a clubhouse, library, two craft rooms, a swimming pool, fitness center, billiards room, tennis/pickleball, bocce courts, pitching/putting green with outdoor driving net, shuffleboard courts, horseshoe pitch, marina, and a woodshop. Further, our amenities include broadband and cable television services. All residents pay for these amenities as part of a single homeowner maintenance fee.

Regarding the offering of communications services, Lazy River Village has a bulk billing contract with a services provider to deliver two fiber-optic television hookups and high-speed broadband wireless service to each residence. The provider also offers Wi-Fi service in the clubhouse, billiards room, fitness center, and pool area. We selected our current communications provider after reviewing proposals from multiple providers.

Residents receive communications services at about \$73/month which is included in the maintenance mentioned fee above. This amount is substantially below retail market rates for the services they receive. They also obtain video and broadband services over fiber and obtain excellent customer service directly from the provider. Further, residents may upgrade these baseline communications services, in which case they will pay an additional amount to our communications provider. We believe this bulk billing arrangement best serves our residents' interests.

We find the FCC's reasoning for regulating bulk arrangements both baffling and inaccurate; as our current bulk billing arrangement demonstrates, it maximizes the welfare of our residents. Moreover, should the FCC alter these arrangements, such as permitting any individual resident to opt out of the arrangement, our residents – all seniors – would end up paying much higher prices for broadband and cable.

We therefore urge you to reject any effort to ban or regulate bulk billing arrangements, including those that already exist.

Regards,

/s/ Bob Jones

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