



***Gator Trace Master Property Owners  
Association, Inc.***  
*Fort Pierce, FL 34982*

[www.gatortracemasterassociation.com](http://www.gatortracemasterassociation.com)

May 22, 2024

Re: FCC proposed rule to eliminate bulk billing for broadband services

Dear FCC Chairwoman Jessica Rosenworcel and commissioners,

On behalf of the Gator Trace Master Property Owners Association and the 350 households—comprised of single-family homes, villas and condominiums—that we represent, this letter seeks to underscore the many benefits to our owners and residents of having the HOA’s ability to negotiate bulk internet and television contracts for our community without permitting any residents to opt out. With our community’s support, we have negotiated such agreements for at least 25 years and have saved our owners countless tens of thousands of dollars.

We spend many hours consulting, researching and negotiating the best providers, options and prices for our owners; time and expertise that they could ill-afford on their own. Through bulk agreements that include all residents, we are able to leverage our combined buying power to their financial benefit and streamline equipment and service delivery.

We would not even have the choice of our state-of-the-art fiber optic system were it not for our bulk agreement, as providers are not likely to make the huge investment in original infrastructure without it. Our owners would then be locked into one choice: the aging and expensive coaxial system by one provider that was installed about 35 years ago.

Our owners have a dedicated phone number as well as a liaison they can reach out to for support or issue resolution, and we receive superior response times if a service call is needed. The equipment each unit needs is provided, we enjoy extras like the ability to record shows, and owners can add other options at their own expense if they choose to. We know exactly what our rates will be for each owner for the term of our agreement.

The ‘other’ provider may lock in a fee for internet or cable service for a year, but is free to increase other fees, like those for equipment and the dreaded “broadcast TV fee” and “regional sports fee,” which now total \$38 for a disabled, low-income friend who has to buy on her own. Her monthly bill for basic internet, a regular TV package, and equipment is \$212, **more than 3 times what we are paying** for higher internet speed and more channels and features. She was previously eligible for and using the \$30 ACP credit, but that appears to be ending, and barely made a dent in her bill.

Although we applaud your goal of lowering cost and increasing choice for consumers, we believe banning bulk agreements and allowing residents to opt out of the bulk billing arrangement will have the opposite effect. If implemented, the ban could increase costs for those who can least afford it. It may also be a disincentive to upgrade antiquated infrastructure in aging buildings and communities to modern high-speed fiber.

Rather than imposing a ban, we encourage the FCC to explore ways to preserve the benefits of bulk billing while addressing any legitimate market failures that may limit competition.

Sincerely,

The Gator Trace Master Property Owners Association Board of Directors  
Fort Pierce, FL 34982