

May 22, 2024

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

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

Dear Ms. Dortch:

The undersigned companies provide high-speed broadband services to consumers and businesses in apartments and properties overseen by homeowner and condominium owners' associations (MDUs) under bulk billing arrangements. We are writing to express our opposition to any proposal that would impose a ban on bulk billing arrangements or other actions that would weaken the buying group power of the purchasers of such services.

Bulk billing arrangements offer substantial benefits to consumers. Homeowners' and condominium owners' associations and landlords can harness the collective bargaining power of MDU residents to attract multiple service providers – often five or more – to serve their homes. This enables consumers to receive services at monthly rates that are typically more than 50% lower than the standard prices they would pay if they were billed at the retail rate. Moreover, MDUs can secure upgraded infrastructure for their properties and their residents, including fiber optics and managed Wi-Fi. Additionally, residents typically receive elevated customer service compared to what's available to individual customers in the mass market. Providers are willing to make these commitments because bulk billing arrangements provide a predictable revenue stream over a period of time that the provider can build into a stable financial model. That enables the provider to continue competing for new business in other MDUs, building a cycle of ever-increasing competition for service that is repeated.

In some MDUs, especially those where low-income consumers live, lower cost may mean the difference between having access to video and internet access or continuing to be on the wrong side of the digital divide. These arrangements can not only provide these consumers with free service, they remove barriers that often can stand in their way obtaining service, such as credit checks and security deposits. These steps are not necessary under bulk billing arrangements because the landlord (or in some cases, the housing authority or city) is the party to the bulk billing agreement, and the party responsible for paying the bill.

Eliminating bulk billing (or allowing consumers to exclude themselves from their communities' group purchasing decisions) would harm consumers and disrupt the competitive environment that exists today within the MDU marketplace. Consumers would lose the benefit of lower costs, as providers would be required to market separately to each and every unit in the MDU, which increases costs that must be passed on to consumers. Providers would be discouraged from deploying services to older buildings served by larger incumbents, leaving them with aging wiring that is incapable of meeting consumer demand for higher speeds and better service. Further, many low-income consumers would be most harmed by eliminating bulk billing, as they would lack the ability to afford higher-cost services.

In 2010, the FCC concluded that bulk billing is an effective model for reducing prices and increasing internet access. Many stakeholders agree that reversing this well-reasoned decision would contravene the public interest. We agree – the FCC should abandon any plans to eliminate bulk billing arrangements in MDUs or to take other actions that would weaken the buying group power of the purchasers of such services.

Respectfully submitted,

Ethoplex Internet  
(serving Wisconsin)

Ethx, LLC  
(serving Florida)

Nextlink Internet  
(serving Illinois, Indiana, Iowa, Louisiana,  
Nebraska, Oklahoma, and Texas)

Massillon Cable TV, Inc.  
(serving Ohio)

On-Ramp Indiana, Inc.  
(serving Indiana)

Rise Broadband  
(serving Colorado, Idaho, Illinois, Indiana, Iowa,  
Kansas, Minnesota, Missouri, Nebraska,  
Nevada, Oklahoma, South Dakota, Texas, Utah,  
and Wyoming)