

Seascape I – Ocean Village Fort Pierce, Florida 34949

May 24, 2024

Federal Communications Commission
Washington, DC

RE: Ending bulk buying of TV/Internet

It has been brought to our attention that the FCC is considering banning bulk buying of TV/Internet for HOAs/COAs. We believe this would be a very bad idea. Our owners have recognized the benefits of the condo association buying our TV/Internet services in bulk for more than 20 years. We believe we can get a better deal than if each owner bought their own services individually.

Bulk buying has many benefits for our Association and our Owners:

1. Bulk contracts allow us to leverage our collective buying power to maximize the benefits to our owners, while minimizing costs. This can save our owners almost 50% if done as a bulk deal.
2. Bulk contracts guarantee that there are never any surprise fees for the extras (HD, DVR, Modem, etc), as these are included in the fees we pay at a predetermined monthly rate.
3. Bulk contract rate changes occur once a year at the negotiated rate and are generally less than inflation.
4. Our bulk contract provides for Customer Service 1-minute wait times on calls to a dedicated association telephone number, as well as same day or next day home support from certified technicians. This is first class service and this just doesn't happen to individuals who pay their own way.
5. Our bulk property has a dedicated Project Manager with whom we communicate in real time if there are any issues outside of the scope of routine Customer Service.
6. With our bulk carrier, we had the opportunity to switch to fiber optic cable throughout the association, which provided a far superior product at no additional cost to us.

There are also some downsides if bulk services are taken away:

1. The biggest one is price. Individuals will all instantly have to pay anywhere from \$60 to \$200 more (per month) depending on the package chosen and be subject to unspecified increases at the whim of the vendor, as opposed to the current multi-year, negotiated rate structure.
2. The condo association would lose the benefit of free or complimentary services like TV/Internet in our clubrooms, out by the pool, for our door entry security, and our community TV channel. The cost of these services would have to be passed along to owners via increased monthly association fees.
3. Bulk providers offer better, broader, and faster service and support. Without bulk buying there would be fewer options and it would be much more expensive.
4. Without bulk buying, many of our seniors will have to cancel TV or internet. This might force some seniors to sell their condo and move to an area where they can live on their fixed income.
5. Without the ability to bulk buy, our association will have no ability to negotiate lower rates and improved services and will lose any leverage to remedy ongoing problems with service.
6. There will be huge issues with infrastructure limitations, particularly in areas where multiple vendors serve older communities where they will be forced to share outdated physical infrastructure (such as electrical rooms and conduit). Work by one vendor frequently causes problems with other vendors in shared spaces, as well as causing competing wireless signal issues.

Our owners tell us they want 3 things – a great TV/Internet experience, superior customer service, and at a reasonable rate. That's exactly what bulk buying provides. We ask that you choose to continue to allow bulk buying of TV/Internet.



Jim Dobbin, Vice President
Seascape I Board of Directors / Ocean Village, Fort Pierce, FL