

# NO HOME LEFT OFFLINE

April 19, 2024

Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**RE: *Ex Parte* Letter from the No Home Left Offline Coalition on *Improving Competitive Broadband Access to Multiple Tenant Environments*, GN Docket No. 17-142**

The undersigned organizations submit this ex parte communication as part of the No Home Left Offline Coalition, a coalition of national nonprofit organizations representing broadband, housing, healthcare, civil rights, education, and local government committed to advocating for the development, inclusion, and implementation of equitable broadband policies that ensure that No Home is Left Offline. We are writing today to express concern about the Federal Communication Commission's (FCC) proposal to eliminate or severely restrict bulk billing arrangements in multi-dwelling units, which could negatively impact the more than 11.5 million<sup>1</sup> households in public or affordable housing.

In the digital age, access to the internet has become synonymous with access to essential services, education, healthcare, and economic opportunities. Bulk billing agreements for internet service have played a crucial role in ensuring that residents in multi-dwelling units (MDUs), particularly those in public and affordable housing who account for 20-25% of the nation's digital divide,<sup>2</sup> can affordably connect to the online world. However, the recent proposal to eliminate or severely restrict bulk billing agreements threatens to disrupt this vital lifeline, potentially diminishing competition and exacerbating disparities in digital access.

Members of our coalition are deeply concerned that the proposed elimination or restriction of bulk billing agreements for internet service in MDUs will jeopardize both existing and future digital access for vulnerable populations. Without these agreements, public and affordable housing providers may struggle to negotiate favorable terms with internet service providers (ISPs) and managed service providers (MSPs), leading to higher internet costs for residents. At a time when the future of the Affordable Connectivity Program (ACP) remains uncertain, the unintended consequences of the FCC's proposal would mean some of our nation's most vulnerable populations are unable to connect to affordable, high-speed internet, further widening the gap in digital literacy and access to online resources.

Cities and states across the country have been working to close the digital divide and, in many cases, have utilized a bulk billing model to bring affordable internet service to underserved and

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<sup>1</sup> Page 8, <https://www.educationsuperhighway.org/wp-content/uploads/Apartment-Wi-Fi-2023.pdf>

<sup>2</sup> Page 3, <https://www.educationsuperhighway.org/wp-content/uploads/Apartment-Wi-Fi-2023.pdf>

vulnerable communities. For example, in North Carolina, the City of Charlotte's *AccessCharlotte Program*<sup>3</sup> provides free internet to 2,000 households within privately owned naturally occurring affordable housing (NOAH) MDUs using funding from the Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020 and American Rescue Plan Act of 2021.<sup>4</sup> This initiative is part of a range of investments to promote digital inclusion and equity across the city and relies on a bulk billing arrangement. Similar efforts exist in New York<sup>5</sup> and Massachusetts<sup>6</sup> where programs designed to connect residents in public and affordable housing involve bulk contracts with government entities or housing providers.

While affordability is a key cause of residents lacking connectivity, the often overlooked physical infrastructure of suburban and urban buildings also needs to be addressed. Many public and affordable housing buildings have internal wiring that is outdated, with cabling that is often beyond its useful life, or has been neglected for years and is no longer sufficiently capable of delivering modern broadband speeds. Bulk billing arrangements facilitate the capital investment for upgrades and improvements to connect residents. The average cost of installation for managed Wi-Fi infrastructure in a multi-dwelling unit is approximately \$650 per unit, compared to \$1,200 per unit to deploy fiber.<sup>7</sup> Likewise, the majority of underserved communities, particularly in rural areas across the country, are limited to one or two ISPs and many households in public and affordable housing struggle to afford the market-rate retail service offerings. Residents in these buildings often benefit from the cost-savings of bulk billing agreements. The average retail cost of internet service for a household is approximately \$70 per month, however, that cost is as low as \$15 per household in bulk billing arrangements where managed Wi-Fi is deployed to provide connectivity to each unit. Further, without a bulk arrangement, residents must often shoulder the burden of equipment rental, signing up for service, and individually troubleshooting network issues. Affordable and public housing providers will not be able or willing to partner with managed service providers or ISPs to fund the upgrades and modernization of buildings necessary to connect residents without bulk billing arrangement, further exacerbating long-held inequalities in broadband access.

As policymakers consider reforms to internet service provision, it is imperative to prioritize the needs of underserved communities, uphold principles of accessibility and affordability, and avoid

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<sup>3</sup> Access Charlotte Pilot Summary,

<https://www.charlottenc.gov/Growth-and-Development/Smart-Charlotte/Access-Charlotte>

<sup>4</sup> See page 27, <https://www.educationsuperhighway.org/wp-content/uploads/Apartment-Wi-Fi-2023.pdf>

<sup>5</sup> New York City's *Big Apple Connect* Program, run by the City's Office of Technology and Innovation officially launched in September 2022 to ensure that residents of the New York City Housing Authority (NYCHA) residents have access to free, fast, reliable, and safe internet. NYCHA residents without existing home internet are able to sign up for *Big Apple Connect* with either Optimum or Spectrum. Existing Optimum and Spectrum customers will have their bills reduced to as low as \$0, as monthly internet and basic cable TV charges are eliminated. This program is funded by the City which pays the vendor directly.

<https://www.nyc.gov/assets/bigappleconnect/>

<sup>6</sup> See CASE STUDY Metropolitan Area Planning Council and Urban Edge. pages 15, 28,

<https://www.educationsuperhighway.org/wp-content/uploads/Apartment-Wi-Fi-2023.pdf>

<sup>7</sup> Page 13, <https://www.educationsuperhighway.org/wp-content/uploads/Apartment-Wi-Fi-2023.pdf>

the unintended consequences of the current proposal. We encourage the Commission to delay in its consideration of this rulemaking to allow the FCC more time to gather additional evidence on bulk billing practices within multiple tenant environments in order to assess the direct and indirect impact of proposals to eliminate or restrict the practice.

Sincerely,

Community Associations Institute  
Council for Affordable and Rural Housing  
EducationSuperHighway  
Institute of Real Estate Management  
Manufactured Housing Institute  
Multicultural Media, Telecom and Internet Council  
National Affordable Housing Management Association  
National Apartment Association  
National Association of Housing Cooperatives  
National Multifamily Housing Council  
Stewards of Affordable Housing for the Future (SAHF)