November 1, 2022

Chairwoman Jessica Rosenworcel
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Empowering Broadband Consumers Through Transparency, CG Docket No. 22-2

Chairwoman Rosenworcel:

We, the undersigned, strongly support the creation of the broadband consumer label, as mandated by the Infrastructure Investment and Jobs Act and endorsed in a presidential executive order,¹ and we call upon the Commission to ensure the label is clear and easily accessible.

For too long, consumers have struggled with internet bills that are opaque and misleading. The typical internet plan is inscrutable to the average person, containing a maze of ancillary fees and confusing terms. Consumers cannot make informed decisions in this environment. Just last week, Carnegie Mellon University published a study finding consumers want better disclosures and overwhelmingly support the broadband label.²

However, the label will not be successful if consumers cannot find it. Many ISPs are adept at hiding billing terms amid fine print and poor website design. The label must not fall victim to these practices. Accordingly, the Commission should require the clear and prominent display of the label on the customer’s monthly bill. This is where consumers most frequently interact with their ISP and need the information provided in the label to identify surprise fees and other inaccuracies.

The Commission should reject proposals to limit the label’s display to the point-of-sale. As President Biden noted in a speech last week, the label is intended to help consumers avoid “junk fees.”³ The label cannot fulfill this purpose if it is only displayed once, when a subscriber signs up for service, never to be seen again. To identify and deter junk fees, consumers need to see the label after the point of sale, on their monthly bill, where junk fees often first appear.

If a monthly bill requirement is not achievable in the forthcoming order, we urge the Commission to reconsider the question in a Further Notice of Proposed Rulemaking.

We appreciate the Commission's ongoing efforts to make the broadband label a success. As consumers struggle with high inflation and junk fees, the need for truth-in-billing is especially acute. People deserve to know what they are paying for.

Sincerely,

Access Humboldt
Asian Americans Advancing Justice-AAJC
Benton Institute for Broadband & Society
Common Cause
Common Sense
Consumer Reports
Demand Progress Education Fund
Electronic Frontier Foundation
Free Press
Future of Music Coalition
Greenlining Institute
Institute for Local Self-Reliance
Massachusetts Law Reform Institute
Measurement Lab
MediaJustice
mohuman
National Broadband Mapping Coalition
National Consumer Law Center, on behalf of its low-income clients
National Consumers League
National Digital Inclusion Alliance
Next Century Cities
New America's Open Technology Institute
NTEN
OpenCape Corporation
OpenMedia
Professor Jon M. Peha, Carnegie Mellon University, former FCC Chief Technologist
Public Knowledge
Public Utility Law Project of New York
Ranking Digital Rights
United Church of Christ Media Justice Ministry
X-Lab