



Laguna Woods Village®

Federal Communications Commission

Attn: Jessica Rosenworcel, Chair; Brendan Carr; Geoffrey Starks; Nathan Simington; Anna M. Gomez
45 L St. NE
Washington, DC 20002

Dear Chairwoman Rosenworcel and FCC Commissioners:

Laguna Woods Village, an Orange County, California, active 55+ community of more than 18,600 residents at an average age of 76 with many on fixed incomes, is one of the few homeowners' associations that owns and maintains its very own broadband network. The community is a member of the very large cooperative, National Content & Technology Cooperative, which partners with the community to provide network programming (KNBC, KABC, CNN, FOX, etc.) at bulk pricing.

On March 5, 2024, you proposed banning bulk billing arrangements in apartments, condominiums, housing cooperatives, public housing and other multitenant buildings. I am concerned that this proposal would have a negative impact on various residents and communities, including seniors and fixed-income individuals, among others, who reside in condominiums and housing cooperatives, because it will result in increased costs and lower quality infrastructure. Bulk billing arrangements for broadband access through condominiums and HOAs have been proven to benefit residents with lower costs, improved infrastructure and faster internet access; in 2010, the FCC found that bulk billing arrangements "predominately benefit consumers."

I believe the FCC's prior decision is well-founded as it enables consumers, including seniors, fixed-income individuals and others to aggregate their purchasing power. I also believe that providers are currently chosen in a competitive market, as organizations receive multiple bids from companies offering lower rates than those paid by individuals negotiating for service on their own.

Banning bulk billing could nearly triple the cost of programming to the Laguna Woods Village community. I urge your support for bulk billing for broadband access so that these services can remain affordable for our community.

Thank you for your consideration.

Sincerely,