Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of
Truth-in-Billing

COMMENTS
OF
NTCA–THE RURAL BROADBAND ASSOCIATION

NTCA–The Rural Broadband Association (“NTCA”)\(^1\) hereby submits these Comments in response to the request by the Federal Communications Commission (“Commission”) for comment on ways to strengthen the Commission’s truth-in-billing rules.\(^2\) Specifically, the Commission is seeking to “identify concrete and cost-effective rules that will ensure that all voice consumers fully understand the charges on their bills, including whether line items recover a service provider’s own costs or those related to government programs.”\(^3\) NTCA supports the Commission’s efforts to provide clarity to consumers’ bills for voice services and encourages the Commission to apply the rules equally to voice providers of all kinds to best fulfill the

\(^1\) NTCA represents approximately 850 independent, community-based telecommunications companies and cooperatives and more than 400 other firms that support or are themselves engaged in the provision of communications services in the most rural portions of America. All NTCA service provider members are full service rural local exchange carriers (“RLECs”) and broadband providers, and many provide fixed and mobile wireless, video, satellite and other competitive services in rural America as well.


\(^3\) Id.
Commission’s goal and allow consumers an equal comparison among different providers. Additionally, requiring providers to separately list government mandated fees will best enable consumers to see the true costs of service and make more informed “apples-to-apples” decisions in comparing providers’ offerings.

The Commission requests comment in the Public Notice on whether to extend current truth-in-billing rules to interconnected VoIP providers.\textsuperscript{4} NTCA recommends the Commission apply the same truth-in-billing rules to voice providers of all kinds to allow consumers to compare equally all such options. Consumers have as much interest in, and need for, being able to identify the full cost of subscribing to voice service whether that service is offered by wireline, wireless or interconnected VoIP providers.

The Commission also requests comment on whether the truth-in-billing rules applicable to wireline carriers or those pertaining to wireless carriers should be extended to interconnected VoIP providers.\textsuperscript{5} While consumers might, and often do, subscribe to both a fixed and a wireless service, they are very unlikely to subscribe to both a fixed and a VoIP service. Interconnected VoIP services most closely resemble traditional wireline voice services and thus are most likely the two to be compared against one another when consumers are selecting a provider. Similarly, the Commission itself has chosen not to compare wireless rate plans with wireline because “the

\textsuperscript{4} Id.

\textsuperscript{5} Public Notice at p. 2.
differences in rate plans and other attributes of fixed and mobile services would make it inordinately difficult to create a unified benchmark.”

Commission reports also demonstrate that consumers’ use of interconnected VoIP services has increased significantly in the past several years, while subscriptions to traditional wireline services have declined. Interconnected VoIP service is therefore becoming a common choice among consumers. Given the Commission’s inclusion of interconnected VoIP providers in other requirements such as USF contributions and the Communications Assistance for Law Enforcement Act, NTCA contends that extending the truth-in-billing rules to these same VoIP providers would be a natural extension of the Commission’s rules.

Similarly, without the same rules governing the passage of government-mandated fees onto their subscribers, customers could be confused by the options presented. For example, interconnected VoIP providers would be free to advertise a lower “base” rate, and then add miscellaneous fees at the end of each billing cycle. Accordingly, NTCA suggests that all voice providers, whether interconnected VoIP or traditional wireline, be required to handle government-mandated fees in the same manner when applied on consumer bills.

---

6 Urban Rate Survey Public Notice at n. 4, citing Connect America Fund, WC Docket No. 10-90, Order, 28 FCC Rcd 4242, ¶ 6 (WCB 2014).


8 See, e.g., Verizon: Understanding Your Bill, available at http://www.verizon.com/support/smallbusiness/billing/understanding-your-bill.htm (last visited Feb. 6, 2020) (providing an “explanation of taxes and charges” subscribers may see on their bill and noting that subscribers “might find some variation of the … taxes” and charges).
For the reasons stated above, NTCA encourages the Commission to extend the existing truth-in-billing rules applicable to fixed voice providers to interconnected VoIP providers and to clearly identify the only government-mandated fees all voice providers, including interconnected VoIP providers, will be permitted to separately list on consumers’ bills.

Respectfully submitted,

By: /s/ Michael Romano
Michael Romano
Senior Vice President –
Industry Affairs & Business Development
mromano@ntca.org

By: /s/ Tamber Ray
Tamber Ray
Regulatory Counsel
tray@ntca.org

4121 Wilson Boulevard, Suite 1000
Arlington, VA 22203
703-351-2000 (Tel)