



November 10, 2022

Marlene Dortch  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**Re: Empowering Broadband Consumers Through Transparency  
Docket No. 22-2  
*Notice of Ex Parte Presentation***

Dear Ms. Dortch:

On November 9, 2022, the undersigned met via video conference with Adam Cassady, Media Advisor to Commissioner Nathan Simington, to discuss the above-captioned proceeding.

NTCA expressed that the usefulness of broadband labels will be realized most effectively if their form, content, and placement provide clear and accessible information about basic service metrics to consumers. NTCA reiterated that requirements to include broadband labels on monthly bills are not necessary and would present additional cost and administrative burdens to providers. In similar vein, proposals to require labels for grandfathered services would impose burdens that outweigh benefits given that such services are not available for new accounts, and particularly in the case of providers that have consummated merger and acquisition activity and only offer such services through legacy divisions.

Consistent with prior advocacy, NTCA also discussed the cost and complexity of potential requirements to publish labels in multiple languages. *See, Ex Parte* Letter from Joshua Seidemann, Vice President, NTCA, to Marlene H. Dortch, Secretary, FCC, Docket No. 22-2 (filed May 20, 2022). Turning to the intent of broadband labels, namely, facilitating comparison shopping by customers, NTCA noted that machine readable format requirements will not further those goals. Machine readability pertains to the ability of *machines* to read and interpret data. NTCA suggests that the presumed benefits that may be realized by *organizational entities* capable of processing machines readable labels should not prompt additional requirements for providers.

Finally, NTCA discussed the appropriateness for an extended implementation period for small providers, many of whom do not have in-house design departments or staff to manage the production of print and/or potential electronic labels.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed with ECFS.

Respectfully submitted,

*s/ Joshua Seidemann*

Joshua Seidemann

Vice-President Policy and Industry Innovation

cc: Adam Cassady