



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 8, 2022, the undersigned met via video conference with Justin Faulb, Chief of Staff and Legal Advisor for Wireline and National Security to Commissioner Geoffrey Starks, 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 consumer. This type of information at the point of sale can benefit the user experience. In contrast, NTCA noted the lesser usefulness, and increased burden to providers, of mandating labels in monthly bills. Similarly, NTCA explained that proposals to require labels for grandfathered services that are no longer offered for new accounts would create costly and administrative burdens for providers. Such a requirement 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. Finally, NTCA reiterated the cost and complexity of unbounded requirements to publish labels in languages other than English.

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: Justin Faulb