



**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Empowering Broadband Consumers	)	GC Docket No. 22-2
Through Transparency	)	
	)	

**Comments of AARP**

**March 9, 2022**

Trevor R. Roycroft, Ph.D.  
Consultant

David Certner  
Legislative Counsel and  
Legislative Policy Director  
Government Affairs  
AARP  
601 E Street, NW  
Washington, DC 20049

## Contents

<b>I. Introduction .....</b>	<b>1</b>
<b>II. Section 60504 of the Infrastructure Investment and Jobs Act Requires that the 2016 Labels be Updated.....</b>	<b>2</b>
<b>III. The 2016 Labels Continue to Provide a Useful General Format, but Need Modification .....</b>	<b>3</b>
<b>IV. Proposed Improvements to the 2016 Labels .....</b>	<b>6</b>
<b>A. Fixed Broadband Labels .....</b>	<b>7</b>
<b>1. Recommended Changes for the Fixed Broadband “Choose Your Service Data Plan” Section .....</b>	<b>8</b>
<b>2. Contract Plans.....</b>	<b>9</b>
<b>3. Affordable Connectivity Program.....</b>	<b>10</b>
<b>4. The 2016 “Other Charges and Terms” Section Should be Divided .....</b>	<b>10</b>
<b>5. Government Taxes and Other Services on Network .....</b>	<b>11</b>
<b>6. Performance .....</b>	<b>11</b>
<b>7. Network Management .....</b>	<b>11</b>
<b>8. Privacy and Complaints or Inquiries.....</b>	<b>12</b>
<b>B. Mobile Broadband Labels .....</b>	<b>12</b>
<b>1. Device Compatibility .....</b>	<b>13</b>
<b>2. The 2016 Label’s “Choose your Data Plan” Section Should be Updated.....</b>	<b>13</b>
<b>3. Affordable Connectivity Program.....</b>	<b>16</b>
<b>4. Coverage Maps.....</b>	<b>16</b>
<b>5. Charges and Common Terms to All Plans .....</b>	<b>16</b>
<b>6. Government Taxes and Other Government-Related Fees.....</b>	<b>16</b>
<b>7. Performance .....</b>	<b>17</b>
<b>8. Network Management .....</b>	<b>17</b>
<b>9. Privacy and Complaints or Inquiries.....</b>	<b>17</b>
<b>C. Summary on Revisions to the 2016 Labels .....</b>	<b>17</b>
<b>V. Other Matters Raised in the NPRM.....</b>	<b>17</b>
<b>A. Direct Notification.....</b>	<b>17</b>
<b>B. Flexibility of Label Format.....</b>	<b>18</b>
<b>C. Display Location.....</b>	<b>18</b>

<b>D. Accessibility Issues .....</b>	<b>19</b>
<b>E. Enforcement Issues .....</b>	<b>20</b>
<b>F. Implementation.....</b>	<b>20</b>
<b>G. Cost Effectiveness .....</b>	<b>20</b>
<b>H. Digital Equity .....</b>	<b>21</b>
<b>VI. Conclusion .....</b>	<b>21</b>

Appendix 1:	Recommended Fixed Broadband Consumer Disclosure Blank Label
	Recommended Fixed Broadband Consumer Disclosure Provider Instructions
Appendix 2:	Recommended Mobile Broadband Consumer Disclosure Blank Label
	Recommended Mobile Broadband Consumer Disclosure Provider Instructions

**About AARP**

AARP is a nonprofit, nonpartisan organization with a membership of nearly 38 million. As the largest membership organization representing the interests of all older Americans nationwide, AARP is greatly concerned about the health, safety, and financial security of older Americans, including those living on low and fixed incomes. AARP advocates for affordable and accessible telecommunications services at both the state and federal level.

## I. Introduction

AARP respectfully submits these Comments for the FCC’s consideration and thanks the Commission for the opportunity to participate in this important proceeding regarding broadband transparency. Universal voice and broadband connectivity are now more important than they have ever been, and the essential nature of broadband communications services is growing daily as broadband access has become necessary to enable workforce participation, commerce, education, healthcare, aging in place, civic engagement, and social activity.

Older Americans have the potential to reap significant benefits from the widespread availability of affordable and high-quality broadband services. Broadband services can create new opportunities for older Americans to maintain their independence and security, to receive improved medical supervision and care, and to maintain their productivity in the workforce. Broadband provides new avenues for socialization and contact with the outside world for individuals who may experience decreased mobility. Broadband also has the potential to offer expanded support to family and friends who act as unpaid caregivers for older Americans. Key to the realization of the benefits of broadband for older Americans is accurate and easy to understand information about broadband services. Thus, AARP believes that broadband labels can play an important role in promoting broadband adoption among older Americans, as well as protecting all consumers from potentially misleading marketing practices.

The Commission’s 2016 Public Notice adopted broadband labels that had been developed by the Commission’s Consumer Advisory Committee (CAC), in consultation with various stakeholders.<sup>1</sup> By following the format prescribed in the Public Notice, ISPs would be provided a safe harbor with which to comply with the Commission’s 2015 transparency requirements as contained in the *2015 Open Internet Order*.<sup>2</sup> The 2016 Public Notice included examples of label formats for fixed and mobile broadband services.

AARP believes that the 2016 broadband labels provide an appropriate foundation upon which the Commission can build to satisfy the requirements of the Infrastructure Investment and Jobs Act’s (IIJA) direction regarding consumer broadband labels.

AARP has reviewed the relevant sections of the IIJA and the 2016 labels and here proposes updates to the 2016 labels that will comply with the provisions of the IIJA and also enable consumers to make informed decisions regarding their alternatives for fixed and mobile broadband.

---

<sup>1</sup> Public Notice of the Commission issued on April 4, 2016 (DA 16–357), p. 1 (hereinafter “2016 Public Notice”). See also, *FCC Consumer Advisory Committee Recommendation, Broadband Consumer Disclosures*, submitted October 26, 2015, pp. 1-2. Available at <https://www.fcc.gov/encyclopedia/consumer-advisory-committee-recommendations-2014-thru-2016>.

<sup>2</sup> 2016 Public Notice, p. 1.

Consistent with the presentation of the 2016 labels, AARP has created one pair of labels for fixed broadband service and another pair of labels for mobility broadband service. The first label in each pair reflects the shell label to which consumers will have access, once populated by the ISP. The second label in each pair contains the instructions for the broadband ISP regarding the data that they will enter in the label.

AARP has provided copies of the proposed labels in Appendix 1 and Appendix 2 of these comments. While AARP was able to use much of the content from the 2016 labels, in order to clearly indicate AARP's modifications to the 2016 labels, content added by AARP to the 2016 labels is highlighted in yellow, both in the appendices and in the comments that follow.

In the sections that follow AARP will respond to the *NPRM*'s request for comments and explain AARP's proposals for the labels.

## **II. Section 60504 of the Infrastructure Investment and Jobs Act Requires that the 2016 Labels be Updated**

As noted in the *NPRM*, Section 60504 of the IIJA provides the impetus for this proceeding.<sup>3</sup> AARP's review of Section 60504 leads AARP to conclude that the section requires the Commission evaluate the effectiveness of the transparency format described in the 2016 Public Notice, and also explicitly expands the scope of the 2016 format.

With regard to the regulations associated with the display of labels, Section 60504 states that the labels should be "as described in the Public Notice of the Commission issued on April 4, 2016." While Section 60504 makes specific reference to the labels "as described" in the 2016 Public Notice, Section 60504 also contains two provisions that suggest that the labels approved by the Commission need not be identical to the 2016 labels. Indeed, those two sections of the IIJA indicate that the format approved by the Commission should be based on a new data-driven analysis. Section 60504(c)(2) states that prior to issuing the final rules associated with the labels, the Commission should gather data through a process of public hearings to determine, among other factors, "whether disclosures to consumers of information regarding broadband internet access service plans . . . are available, effective, and sufficient."

In addition, Section 60504(c)(2) states that part of the purpose of those hearings is to evaluate "disclosures required under section 8.1 of title 47, Code of Federal Regulations." By suggesting that the Commission should evaluate the effectiveness and sufficiency of disclosures required by section 8.1 of 47 CFR, which was not in place at the time the 2016 labels were created,<sup>4</sup> Section 60504 clearly indicates that the Commission may need to modify the 2016 labels. Given Section

---

<sup>3</sup> *NPRM*, ¶1, 3, 25, 30.

<sup>4</sup> The 47 CFR §8.1 requirements were effective February 22, 2018, following the Commission "Restoring Internet Freedom" Order.

60504(c)'s direction regarding the need to gather data prior to issuing its final rules, there can be no doubt that the IJA envisions a process where the Commission is free to update the labels based on the data that it collects, including the public hearings, as well as the comments received through the *NPRM*. In addition, the Commission could consider using focus groups to review label formats.

In addition, and further supporting the proposition that Commission has the authority under the IJA to revise the format and content of the 2016 labels, Section 60504(b)(1) states that the labels “shall also include information regarding whether the offered price is an introductory rate and, if so, the price the consumer will be required to pay following the introductory period.” This language necessitates changes be made to the 2016 labels as the 2016 labels did not explicitly require disclosure of introductory rates.<sup>5</sup> Thus, while Section 60504 earlier states that the Commission’s regulations should be “as described” in the 2016 Public Notice, the statute clearly envisions the Commission making changes to the 2016 labels.

### **III. The 2016 Labels Continue to Provide a Useful General Format, but Need Modification**

The *NPRM* asks whether “anything has changed since the CAC developed the 2016 labels that would suggest an update to content and format is necessary.”<sup>6</sup> AARP believes that the general format of the 2016 labels, inspired by the familiar food nutrition labels,<sup>7</sup> continues to provide an appropriate framework for reporting information to consumers. AARP believes that the Commission should require that all fixed and mobile ISPs use a uniform format which will enable side-by-side comparisons of either the fixed or mobile broadband offerings. The ability to make side-by-side comparisons of services offered by alternative providers, as well as various service offerings made available by an individual service provider, continues to be essential for consumers to make informed decisions. AARP believes that the Commission should exercise caution when considering ISP requests to deviate from the label standards adopted by the Commission.<sup>8</sup>

AARP also believes that the Commission should require that the labels be made available in a machine-readable format<sup>9</sup> to the Commission, as well as interested members of the public. The

---

<sup>5</sup> The 2016 fixed broadband labels identified two types of prices, a “Monthly charge for a month-to-month plan,” and a “Monthly charge for a ... contract plan.” Neither of these two disclosures would reveal whether the charge offered is an introductory rate, which would eventually revert to a permanent rate after some period. For mobility broadband services the 2016 labels require the reporting of a “monthly charge,” and do not mention introductory rates.

<sup>6</sup> *NPRM*, ¶4.

<sup>7</sup> FCC Consumer Advisory Committee Recommendation, Broadband Disclosures, p. 1.  
<https://docs.fcc.gov/public/attachments/DOC-336136A1.pdf>

<sup>8</sup> *NPRM*, ¶11.

<sup>9</sup> *NPRM*, ¶11.

availability of data in machine-readable formats will promote new comparison products based on the data contained in the labels. Buying broadband is a complex process, and not all consumers will have the same level of expertise regarding the characteristics of broadband services. AARP believes that by requiring the disclosure of the information recommended in these comments, in a machine-readable format consistent with the 2016 labels, the FCC will provide a solid foundation for the use of the data to generate additional shopping tools tailored by third parties to meet the needs of their constituencies. For example, AARP could envision using the data to develop shopping tools for older Americans to help cut through jargon and confusing language that can often be used to describe broadband services.

The *NPRM* also request comment regarding how ISPs currently disclose information about their broadband services.<sup>10</sup> AARP notes that there are a wide range of methods utilized by broadband providers. Some service providers have a limited number of offers and present the information in a relatively uncluttered and easy to understand format. For example, fixed broadband provider Sonic presents information on its broadband offering that are simple to understand, and which are uncluttered by complex bundles. Sonic does not directly provide video services and, where it has deployed fiber, offers fixed broadband service at a uniform price of \$39.99 per month for symmetrical 1 Gbps service.<sup>11</sup> Alternatively, mobile broadband reseller Mint Mobile provides information on its wireless plans without the clutter of non-communications services, such as video streaming or gaming. Unfortunately, business philosophies of providing relative pricing transparency have not been adopted by all ISPs. Other broadband providers may promote complex service offers that are characterized by bundles of voice, video, internet, and potentially other services, such as home security or wireless mobility services. The ability of consumers to understand the complexity of service offers available from some service providers would benefit significantly from a reporting format for broadband services such as that associated with the 2016 labels.

The *NPRM* also requests comments on the scope of broadband service plans to which the labels should be applied.<sup>12</sup> AARP believes that the labels should be required for each broadband service plan offered by a carrier, regardless of the number or type of services that are offered by the ISP in its service bundles. AARP believes that labels associated with stand-alone broadband services will provide important information to consumers who increasingly can obtain content and services “over the top” of their broadband connection from service providers other than their broadband ISP.

---

<sup>10</sup> *NPRM*, ¶4.

<sup>11</sup> <https://www.sonic.com/fiber-optic-internet>

<sup>12</sup> *NPRM*, ¶4.

The *NPRM* requests comment on the treatment of “legacy or grandfathered plans.”<sup>13</sup> AARP believes that the Commission should not impose the reporting standards for plans that are no longer available for purchase by new customers. However, going forward, AARP believes that carriers should be required to maintain an archive of “retired” service plan labels so that consumers who subscribe to the grandfathered plans of the future can make comparisons to the currently available service offerings of either their own service provider, or the services offered by other providers. This requirement would also address the *NPRM*’s question regarding the appropriate means of notifying consumers of changes.<sup>14</sup>

---

*This portion of the page intentionally left blank.*

---

---

<sup>13</sup> *NPRM*, ¶4.

<sup>14</sup> *NPRM*, ¶10.



#### IV. Proposed Improvements to the 2016 Labels

The *NPRM* requests comment on whether the 2016 labels' content sufficiently includes all the information consumers need to make informed decisions, or whether there is information from the 2016 labels that is no longer necessary to serve the goals of the IIJA.<sup>15</sup> AARP believes that the format and much content of the 2016 labels continues to be appropriate, however, some modifications are needed. AARP believes that broadband labels are needed and will not result in "overwhelming consumers with too much information."<sup>16</sup> Rather, by providing a standardized format, broadband labels based on the basic 2016 format will help consumers navigate the market, which continues to be characterized by service provider practices that fail to fully inform consumers, either by making important information about service offerings difficult to find, or by promoting complex bundles that include non-broadband services, such as video streaming services or a legacy video "channel lineup." In order to ensure that the labels are informative, the Commission should require that ISPs provide information in language that is not unnecessarily complex. AARP's recommended instructions to ISPs, shown in the appendices, emphasizes the importance of clear statements from the ISPs in their disclosures.

The 2016 labels consisted of four sample labels. For fixed broadband services the 2016 labels contained a "Consumer Disclosure Blank Label" which showed the label as it would appear prior to being populated by the ISP. The fixed broadband labels also included "Consumer Disclosure Provider Instructions" which added instructions for the ISP on how to populate the label. A similar pair of labels was provided for mobile broadband services. AARP believes that this approach continues to be appropriate and in Appendices 1 and 2 AARP has provided examples of the revised pairs of labels for fixed and mobile broadband services.

Because of the provisions of the IIJA, additional information on introductory rates, which were not explicitly contained in the 2016 labels is required. AARP also believes that the FCC's existing transparency requirements should be incorporated into the revised labels.<sup>17</sup> Beyond those changes, AARP has also suggested minor changes and clarifications in light of the evolution of technological change and carrier marketing practices. AARP will discuss the changes in the following sections. In each section AARP will begin by presenting a side-by-side comparison of the 2016 "Consumer Disclosure Blank" label and AARP's recommended modifications. AARP will then discuss the proposed changes in more detail, using elements of the "Consumer Disclosure Provider Instructions" labels to more fully address the corresponding changes needed in the instructions to the ISPs for each label. Full copies of the labels are shown in Appendix 1 for fixed broadband and in Appendix 2 for mobility broadband.

---

<sup>15</sup> *NPRM*, ¶5.

<sup>16</sup> *NPRM*, ¶5.

<sup>17</sup> *NPRM*, ¶15, referencing 47 CFR 8.1.

## A. Fixed Broadband Labels

The 2016 labels for fixed broadband contain seven sections: “Choose your Service Data Plan,” “Other Charges and Terms,” Government Taxes and Other Government-Related Fees,” “Performance,” “Network Management,” “Privacy,” and “Complaints or Inquiries.” AARP discusses changes recommended in these sections below. A side-by-side comparison of the “Consumer Disclosure” fixed-broadband labels is provided in Table 1 below, with the modifications contained in the proposed labels highlighted.

**Table 1: Side-by-Side Comparison of Fixed Broadband Labels**

2016 Fixed Broadband Label	Recommended Fixed Broadband Label (See Appendix 1 for Provider Instructions)
<p><b>Broadband Facts</b></p> <p>Fixed broadband consumer disclosure</p> <p><b>Choose Your Service Data Plan for</b></p> <p>Monthly charge for month-to-month plan</p> <p>Monthly charge for 2 year contract plan</p> <p>Click here for other <a href="#">pricing options</a> including promotions and options bundled with other services, like cable television and wireless services.</p> <p><b>Other Charges and Terms</b></p> <p>Data included with monthly charge</p> <p>Charges for additional data usage</p> <p>Optional modem or gateway lease – Customers may use their own modem or gateway; click here for <a href="#">our policy</a></p> <p>Other monthly fees</p> <p>One-time fees</p> <p><b>Government Taxes and Other Government-Related Fees May Apply:</b> Varies by location</p> <p><a href="#">Other services on network</a></p> <p><b>Performance - Individual experience may vary</b></p> <p>Typical speed downstream</p> <p>Typical speed upstream</p> <p>Typical latency</p> <p>Typical packet loss</p> <p><b>Network Management</b></p> <p>Application-specific network management practices?</p> <p>Subscriber-triggered network management practices?</p> <p>More <a href="#">details on network management</a></p> <p><b>Privacy</b> See our <a href="#">privacy policy</a></p> <p><b>Complaints or Inquiries</b> To contact us: <a href="#">online/(123)456-7890</a>; To submit complaints to the FCC: <a href="#">online/(888)225-5322</a></p> <p>Learn more about the <a href="#">terms used on this form and other relevant information</a> at the FCC’s website.</p>	<p><b>Broadband Facts</b></p> <p>Fixed broadband consumer disclosure</p> <p><b>Choose Your Service Data Plan for</b></p> <p>Monthly charge for month-to-month plan</p> <p><a href="#">Learn more about introductory offers and/or promotions</a> for month-to-month plan.</p> <p>Monthly charge for 2 year contract plan</p> <p><a href="#">Learn more about introductory offers or promotions</a> for 2 year contract plan.</p> <p>Click here for <a href="#">service options</a> that combine fixed broadband service with other services like video content, wireless services, or voice telephone service.</p> <p>Information about the Affordable Connectivity Program, which offers discounted service prices to eligible households <a href="#">can be found here</a>.</p> <p><b>Data Usage and Overage Charges</b></p> <p>Data included with monthly charge</p> <p><a href="#">Speed reductions if data usage cap exceeded?</a></p> <p><a href="#">Charges for additional data usage</a></p> <p><b>Other Charges and Terms</b></p> <p>Optional modem or gateway lease—Customers may use their own modem or gateway; click here for <a href="#">our policy</a></p> <p>Other monthly fees</p> <p>One-time fees</p> <p><b>Government Taxes and Other Government-Related Fees May Apply:</b> Varies by location</p> <p><a href="#">Other services on network</a></p> <p><b>Performance—Individual experience may vary</b></p> <p>Typical speed downstream <a href="#">(higher numbers are superior)</a></p> <p>Typical speed upstream <a href="#">(higher numbers are superior)</a></p> <p>Typical latency <a href="#">(lower numbers are superior)</a></p> <p>Typical packet loss <a href="#">(lower percentages are superior)</a></p> <p><b>Network Management</b></p> <p><a href="#">Blocking of traffic?</a></p> <p><a href="#">Throttling of traffic?</a></p> <p><a href="#">Paid prioritization of traffic?</a></p> <p><a href="#">Affiliated prioritization of traffic?</a></p> <p><a href="#">Congestion management?</a></p> <p>Application-specific network management practices?</p> <p>Subscriber-triggered network management practices?</p> <p><a href="#">Device attachment restrictions?</a></p> <p><a href="#">Security Policy</a></p> <p>More <a href="#">details on network management</a></p> <p><b>Privacy</b> See our <a href="#">privacy policy</a></p> <p><b>Complaints or Inquiries</b> To contact us: <a href="#">online/(123)456-7890</a> To submit complaints to the FCC: <a href="#">online/(888)225-5322</a></p> <p>Learn more about the <a href="#">terms used on the form and other relevant information</a> at the FCC’s website.</p>

## 1. Recommended Changes for the Fixed Broadband “Choose Your Service Data Plan” Section

The NPRM requests comment on whether the 2016 labels satisfy the IIJA’s requirement that the price offered is an introductory rate.<sup>18</sup> AARP notes that Section 60504 states that the label “shall also include information regarding whether the *offered* price is an introductory rate.” Based on AARP’s review of the instructions associated with the 2016 labels, it does not appear that the IIJA’s introductory rate disclosure requirement is satisfied by the 2016 label format or provider instructions, which only makes use of the term “promotional” with reference to *prices* reported in the labels.<sup>19</sup> Promotions may include those based on prices, or they may also be associated with the combination of other elements of potential value to consumers, such as equipment like phones or Wi-Fi routers, or the inclusion of video content with broadband service. Promotions may or may not have a period associated with their effective term. Because it is possible that introductory rates and promotions may be overlapping concepts, AARP believes that the language in the provider instructions should be changed to be consistent with the language of the IIJA.<sup>20</sup>

In addition to clear instructions that the monthly charge shown in the label is not an introductory rate, AARP recommends that the “Consumer Disclosure Provider Instructions” label section require additional information of plan requirements, such as paperless billing or electronic payment. The revised language that addresses both the introductory rate issue and the service requirements from Appendix 1 is provided below, with the new language highlighted.

Monthly charge for month-to-month plan	\$[ ]
[provide price of stand-alone broadband service on a month-to-month basis excluding all promotions or introductory rates; identify plan requirements such as “requires paperless billing,” “requires electronic payment,” “requires autopay”]	

In addition, to inform customers of introductory rates or promotions, AARP believes that another item be added immediately below the “Monthly charge for month-to-month plan” line. The proposed provider instructions language for the new section in the “Broadband Facts” for fixed broadband is shown below.

<sup>18</sup> NPRM, ¶6.

<sup>19</sup> The 2016 labels do not contain similar “promotional” reporting requirements for mobile broadband. As will be discussed in more detail below, because Section 60504 does not distinguish between fixed and mobile broadband, AARP believes that language on introductory rates must also be added to mobile broadband labels.

<sup>20</sup> The 2016 labels provided two pairs of model labels, one for fixed broadband and one for mobile broadband. One component of each pair of labels is a model “Consumer Disclosure Blank Label,” with the other being the “Consumer Disclosure Provider Instructions.” The instructions for the service provider were provided in red typeface in the 2016 labels. AARP’s proposed labels follow this formatting convention from the 2016 labels.

Learn more about introductory offers and/or promotions for month-to-month plan.

*[if applicable, at the underlined language, provide a link to a description of service offers; provide one row for each available option; provide price of plan available with each introductory rate, the duration of the introductory period, and the price effective following the introductory period; provide description and prices associated with promotions; specify any requirements associated with introductory rates or promotions, e.g., "new customers only"]*

## 2. Contract Plans

For contract plans, the 2016 Labels are less specific, not mentioning “non-promotional” prices. As a result, AARP does not believe that the 2016 label format is compliant with the IIJA. AARP believes that the language should be changed to read as follows (highlighted text added to the corresponding 2016 label’s language):

Monthly charge for [ ] contract plan

\$[ ]

*[if applicable, identify length of available long-term contract—provide one row for each available option; provide price of stand-alone broadband service available under each long-term contract option excluding all promotions or introductory rates; identify plan requirements such as “requires paperless billing,” “requires electronic payment,” “requires autopay”]*

Similar to the month-to-month plans discussed above, to inform customers of introductory rates or promotions, AARP believes that another line be added immediately below the “Monthly charge for [ ] contract plan” line. The proposed language for the new line in the “Choose your Service Data Plan” section for fixed broadband is shown below.

Learn more about introductory offers or promotions for [ ] contract plan.

*[if applicable, at the underlined language, provide a link to a description of service offers; provide one row for each available option; provide price of plan available with each introductory rate, the duration of the introductory period, and the price effective following the introductory period; provide description and prices associated with promotions; specify any requirements associated with introductory rates or promotions, e.g., “new customers only”]*

Also in the “Choose Your Service Data Plan” section, the 2016 labels contained a click-through link associated with “promotions and options bundled with other services, like cable television and wireless service.” AARP believes that continues to be appropriate to provide information on the availability of service bundles, with a few modifications. Revisions to the 2016 labels on this point are shown below, with highlighted text reflecting AARP’s changes, which include the addition of service provider instructions, which were missing from the 2016 labels.

Click here for [service options](#) that combine fixed broadband service with other services like video content, wireless services, or voice telephone service.  
*[if applicable, at the underlined language, provide a link to a description of service offers that combine fixed broadband with other services]*

### 3. Affordable Connectivity Program

The *NPRM* requests comment on whether the labels should include information regarding the Affordable Connectivity Program (ACP).<sup>21</sup> AARP believes that the broadband labels are an appropriate vehicle for educating customers about the existence of, and potential for participation in, the ACP. Information on the ACP should be included in the “Choose Your Service Data Plan” section of the labels. AARP has added a line to the fixed broadband label that would require service providers to offer consumers information of the program.

Information about the Affordable Connectivity Program, which offers discounted service prices to eligible households [can be found here](#).  
*[at the underlined language provide a link to information about the broadband services to which the Affordable Connectivity Program Applies and eligibility requirements]*

### 4. The 2016 “Other Charges and Terms” Section Should be Divided

AARP believes that the 2016 labels’ “Other Charges and Terms” section should be divided into two separate sections, one titled “Data Usage and Overage Charges” with the other retaining “Other Charges and Terms” name. The 2016 labels’ “Other Charges and Terms” section had previously included data charges and usage information along with other types of charges and fees. AARP’s recommended approach would group all data-related charges in a separate section. In addition to a report of any monthly data allowance associated with a plan, this section would also address the potential for speed reductions that might be associated with thresholds of data usage, or overage charges associated with usage thresholds. The new “Data Usage and Overage Charges” section is shown below and in Appendix 1.

Data Usage and Overage Charges	
Data included with monthly charge	[ ]GB
<i>[if applicable, identify the monthly data allowance with this plan for service at the speed identified, prior to any overage charges, speed reductions, or throttling]</i>	
Speed reductions if data usage cap is exceeded?	[Yes/No]
<i>[if applicable, identify the speed reductions associated with exceeding the data allowance; if multiple thresholds exist, provide one row for each]</i>	
Charges for additional data usage	[\$ ]
<i>[provide one row for increment of additional data, e.g., “each additional 100 GB”; if applicable, identify additional charges if the monthly data allowance is exceeded]</i>	

<sup>21</sup> *NPRM*, ¶9.

As shown in Table 1 and Appendix 1, the “Other Charges and Terms” would then be separately presented, with the same instructions as the 2016 labels.

## **5. Government Taxes and Other Services on Network**

As shown in Table 1 and Appendix 1, AARP proposes that the “Government Taxes and Other Government-Related Fees May Apply” section and “Other services on network” section have the same content as the 2016 labels.

## **6. Performance**

AARP believes that the “Performance” section of the 2016 labels continues to be appropriate, with one minor modification. Given the technical nature of reports of broadband speeds, latency, and packet loss, AARP recommends that the descriptors for these metrics include brief explanatory language. For downstream and upstream speeds, AARP recommends that the words “(higher numbers are superior)” be included following the “Typical speed” statements. For latency AARP recommends that the language be expanded to include “(lower numbers are superior),” and for “Typical packet loss” the words “(lower percentages are superior)” should be included. The revised portion of the table is shown above in the side-by-side comparison in Table 1 and in Appendix 1.

## **7. Network Management**

The *NPRM* requests comment on whether additional content is needed in the labels to reflect the FCC’s existing transparency requirements, such as whether the service provider engages in blocking, throttling, or paid prioritization, or whether consumers face limits associated with device attachment to the network.<sup>22</sup> AARP believes that this type of information should be provided with the labels and proposes to expand the 2016 labels to address this issue. Specifically, AARP believes that the “Network Management” section of the labels should be expanded to include the transparency requirements imposed by the *Restoring Internet Freedom Order*.<sup>23</sup> The revised Network Management section is expanded to address the existing transparency requirements, with the Network Management sections from the 2016 labels remaining unchanged in the expanded section. The revised Network Management section is shown in Table 1 and Appendix 1.

The *NPRM* also requests comment on the appropriateness of the labels informing customers regarding matters such as the need for paperless billing, electronic payment, rental of equipment, and/or enrollment in related services.<sup>24</sup> AARP believes that the labels should address those

---

<sup>22</sup> *NPRM*, ¶8 and ¶16.

<sup>23</sup> *In the Matter of Restoring Internet Freedom*, WC Docket No. 17-108, Declaratory Ruling, Report and Order, and Order, January 4, 2018, ¶220.

<sup>24</sup> *NPRM*, ¶8.

issues and has made additions that address this type of information, discussed above and shown in Appendix 1.

## **8. Privacy and Complaints or Inquiries**

AARP believes that the format and content from the 2016 labels is appropriate and leaves those sections in the fixed broadband labels unchanged, as shown in Table 1 and Appendix 1.

### **B. Mobile Broadband Labels**

Mobile broadband ISP services and marketing practices have evolved since the release of the 2016 labels. Wireless carrier platforms have transitioned from predominantly 3G/4G in 2016 to 4G/LTE/5G in 2022. The higher data speeds have enabled greater capabilities from the wireless networks and have also resulted in changes in carrier marketing practices. Notably, the 2016 labels were designed to provide descriptions of various “By the Gig” plans, which reflected the predominant method of selling wireless service in 2016.<sup>25</sup> While “By the Gig” plans still exist in 2022, many carriers have shifted their sales strategy to offer consumers so-called “unlimited” plans. The use of “unlimited” in these plans strains the common meaning of that term in that data usage is not truly “unlimited.” In the wireless marketing context, “unlimited” most frequently means that past some level of usage, measured in gigabytes, the consumer will face some consequence, e.g., decreased service speeds.

In addition to the introduction of the so-called “unlimited” model of data usage, wireless mobility broadband providers have also changed their marketing approach to prominently feature services sold by the number of connections associated with a plan. In 2016 service providers generally focused on pricing for a single line of service, with additional lines available to create “family plans” that may have included a shared pool of data.<sup>26</sup> Wireless carriers today frequently initiate the selection process by inviting the prospective customer to identify the number of lines they would like to purchase, with the implicit per-line price of the plan decreasing as more lines are added.

Another change that has emerged since 2016 with the offering of wireless services since 2016 is the growth in the diversity of non-communications add-ons to mobile broadband offerings provided by some wireless carriers, especially streaming video services such as Disney+ or Netflix, or gaming content, such as that provided by the Apple Arcade or Google Play.

The 2016 labels for mobile broadband contain eight sections: “Device Compatibility,” “Choose your Data Plan,” “Charges and Terms Common to All Plans,” Government Taxes and Fees, and Other Carrier Surcharges May Also Apply,” “Performance,” “Network Management,” “Privacy,” and “Complaints or Inquiries.” AARP discusses changes recommended in these

---

<sup>25</sup> AARP reviewed archived wireless carrier service offers using “Wayback Machine” at <https://archive.org/web/>.

<sup>26</sup> AARP reviewed archived wireless carrier service offers using “Wayback Machine” at <https://archive.org/web/>.



sections below. A side-by-side comparison of the “Consumer Disclosure” mobile-broadband labels is provided below in Table 2, with the modifications to the proposed labels highlighted.

**Table 2: Side-by-Side Comparison of Mobile Broadband Labels**

2016 Mobile Broadband Label	Recommended Mobile Broadband Label (See Appendix 2)																																																																				
<div><h3>Broadband Facts</h3><p>Mobile broadband consumer disclosure</p><div><b>Device Compatibility</b><p>If you want to use your existing device, learn more about <a href="#">compatibility</a>.</p><p>If you want to obtain a device, learn more about <a href="#">prices and other options</a>.</p></div><div><b>Choose Your Data Plan</b> - These prices do not include costs for obtaining a device from us.</div><table><thead><tr><th></th><th colspan="3">High Speed Data allowance per month</th></tr><tr><th></th><th>GB</th><th>GB</th><th>GB</th></tr></thead><tbody><tr><td>Monthly charge</td><td></td><td></td><td></td></tr><tr><td>When you exceed the data allowance</td><td></td><td></td><td></td></tr></tbody></table><p>Learn more about <a href="#">other included services/features</a>.</p><p>Additional pricing options, plans and promotions <a href="#">can be found here</a>.</p><p><a href="#">Coverage Map</a></p><div><b>Charges and Terms Common to All Plans</b><p>Monthly fees</p><p>One-time fees</p></div><div><b>Government Taxes and Fees, and Other Carrier Surcharges May Also Apply:</b> Varies by location</div><div><b>Performance</b> - <a href="#">Individual experience may vary</a></div><table><thead><tr><th colspan="2">G</th><th colspan="2">G</th></tr></thead><tbody><tr><td>Typical speed</td><td>•</td><td>Typical Speed</td><td></td></tr><tr><td>Typical latency</td><td>•</td><td>Typical latency</td><td></td></tr><tr><td>Typical Packet Loss</td><td>•</td><td>Typical Packet Loss</td><td></td></tr></tbody></table><div><b>Network Management</b><p>Application-specific network management practices?</p><p>Subscriber-triggered network management practices?</p><p>More <a href="#">details on network management</a></p></div><div><b>Privacy</b> <a href="#">See our privacy policy</a></div><div><b>Complaints or Inquiries</b> To contact us: <a href="#">online/(123)456-7890</a>; To submit complaints to the FCC: <a href="#">online/(888)225-5322</a></div><div>Learn more about the <a href="#">terms used on this form and other relevant information</a> at the FCC's website.</div></div>		High Speed Data allowance per month				GB	GB	GB	Monthly charge				When you exceed the data allowance				G		G		Typical speed	•	Typical Speed		Typical latency	•	Typical latency		Typical Packet Loss	•	Typical Packet Loss		<div><h3>Broadband Facts</h3><p>Mobile broadband consumer disclosure</p><div><b>Device Compatibility</b><p>If you want to use your existing mobile device, learn more about <a href="#">compatibility</a>.</p><p>If you want to obtain a device, learn more about <a href="#">prices and other options</a>.</p></div><div><b>Choose the number of lines for your Data Plan.</b></div><table><thead><tr><th></th><th colspan="3">High Speed Data Allowance Per Month for</th><th>Line Plan</th></tr><tr><th></th><th>GB</th><th>GB</th><th>GB</th><th>GB</th></tr></thead><tbody><tr><td>Monthly Charge— <a href="#">These prices do not include costs for obtaining a device from us.</a></td><td></td><td></td><td></td><td></td></tr><tr><td>When you exceed the data allowance</td><td></td><td></td><td></td><td></td></tr></tbody></table><p>Learn more about <a href="#">other included services/features</a>.</p><p><a href="#">Learn more about introductory offers and/or promotions.</a></p><p><a href="#">Additional bundle options can be found here.</a></p><p><a href="#">Information about the Affordable Connectivity Program, which offers discounted service prices to eligible households can be found here.</a></p><p><a href="#">Coverage Map</a></p><div><b>Charges and Common to All Plans</b><p>Monthly fees</p><p>One-time fees</p></div><div><b>Government Taxes and Other Government-Related Fees May Apply:</b> Varies by location</div><div><b>Performance</b>—<a href="#">Individual experience may vary</a></div><table><thead><tr><th colspan="2">G</th><th colspan="2">G</th></tr></thead><tbody><tr><td>Typical Speed <a href="#">(higher numbers superior)</a></td><td></td><td>Typical Speed <a href="#">(higher numbers superior)</a></td><td></td></tr><tr><td>Typical Latency <a href="#">(lower numbers superior)</a></td><td></td><td>Typical Latency <a href="#">(lower numbers superior)</a></td><td></td></tr><tr><td>Typical Packet loss <a href="#">(lower percent superior)</a></td><td></td><td>Typical Packet loss <a href="#">(lower percent superior)</a></td><td></td></tr></tbody></table><div><b>Network Management</b><p><a href="#">Blocking of traffic?</a></p><p><a href="#">Throttling of traffic?</a></p><p><a href="#">Paid prioritization of traffic?</a></p><p><a href="#">Affiliated prioritization of traffic?</a></p><p><a href="#">Congestion management?</a></p><p>Application-specific network management practices?</p><p>Subscriber-triggered network management practices?</p><p><a href="#">Device attachment rules</a></p><p><a href="#">Security policy</a></p><p>More <a href="#">details on network management</a>.</p></div><div><b>Privacy</b> <a href="#">See our privacy policy</a></div><div><b>Complaints or Inquiries</b> To contact us: <a href="#">online/(123)456-7890</a>; To submit complaints to the FCC: <a href="#">online/(888)225-5322</a></div><div>Learn more about the <a href="#">terms used on the form and other relevant information</a> at the FCC's website.</div></div>		High Speed Data Allowance Per Month for			Line Plan		GB	GB	GB	GB	Monthly Charge— <a href="#">These prices do not include costs for obtaining a device from us.</a>					When you exceed the data allowance					G		G		Typical Speed <a href="#">(higher numbers superior)</a>		Typical Speed <a href="#">(higher numbers superior)</a>		Typical Latency <a href="#">(lower numbers superior)</a>		Typical Latency <a href="#">(lower numbers superior)</a>		Typical Packet loss <a href="#">(lower percent superior)</a>		Typical Packet loss <a href="#">(lower percent superior)</a>	
	High Speed Data allowance per month																																																																				
	GB	GB	GB																																																																		
Monthly charge																																																																					
When you exceed the data allowance																																																																					
G		G																																																																			
Typical speed	•	Typical Speed																																																																			
Typical latency	•	Typical latency																																																																			
Typical Packet Loss	•	Typical Packet Loss																																																																			
	High Speed Data Allowance Per Month for			Line Plan																																																																	
	GB	GB	GB	GB																																																																	
Monthly Charge— <a href="#">These prices do not include costs for obtaining a device from us.</a>																																																																					
When you exceed the data allowance																																																																					
G		G																																																																			
Typical Speed <a href="#">(higher numbers superior)</a>		Typical Speed <a href="#">(higher numbers superior)</a>																																																																			
Typical Latency <a href="#">(lower numbers superior)</a>		Typical Latency <a href="#">(lower numbers superior)</a>																																																																			
Typical Packet loss <a href="#">(lower percent superior)</a>		Typical Packet loss <a href="#">(lower percent superior)</a>																																																																			

## 1. Device Compatibility

AARP believes that the format from the 2016 labels associated with the Device Compatibility section continues to be appropriate. AARP recommends no changes to this section.

## 2. The 2016 Label’s “Choose your Data Plan” Section Should be Updated

Consistent with wireless carrier marketing practices that feature choice based on the number of lines purchased, AARP believes that the forms should be revised to allow consumers to explore



options based on the number of lines in a plan. As shown in Table 1 and Appendix 2, rather than “Choose your Data Plan,” AARP recommends that “Choose the Number of Lines for Your Data Plan” be the title of the section. This change is shown below for a portion of the table. The entire table is shown in Appendix 2.

<b>Choose the <u>Number of Lines for Your Data Plan.</u></b>	
	<b>High Speed Data Allowance Per Month for [ ] Line Plan</b>
	<p><b>[ ] GB <u>“Unlimited”</u></b></p> <p><i>[if plans are offered in line grouping (e.g., 1 line, 2 line, etc.), at the underlined language provide link to the number of lines and provide this table; for each line grouping identify the monthly high speed data allowance associated with your basic by-the-GB plan; for basic “unlimited” plans, identify the plan as “unlimited” and use the [ ] GB to report the data usage before reductions of data speeds, overage charges, or other consequences occur]</i></p>
<b>Monthly Charge—</b> These prices do not include costs for obtaining a device from us.	<p><b>\$[ ]</b></p> <p><i>[provide non-promotional, non-introductory price of the plan with this data allowance on a month-to-month basis]</i></p>
<b>When you exceed the data allowance</b>	<p><b>[ ]</b></p> <p><i>[if applicable, identify impact on data speeds or additional charges or other outcomes if the monthly data allowance for this plan is exceeded; for “unlimited” plans report impacts based on data usage thresholds that trigger the change in service performance or additional charges]</i></p>

With regard to the data allowance classifications from the 2016 labels, here too modification is appropriate. The 2016 labels provided instructions to the mobile ISP to provide information on three alternative plans from “your most popular plans.” AARP believes that carrier discretion should be permitted for two of the data plan alternatives, however, AARP also believes that a description of the ISP's basic plan should be required, whether that plan is “By the Gig” or “unlimited.” This modification is illustrated above and in Appendix 2.

Because those carriers that offer “unlimited” plans continue to identify GB-based usage thresholds that are associated with changes in service characteristics once exceeded, AARP believes that the use of GB identifiers continues to be appropriate. Depending on carrier practices, those carriers that continue to offer non-unlimited “By the Gig” plans will still use the GB classification scheme alone. For those carriers that offer “unlimited” plans, they will report

based on the characteristics of the “unlimited” plan. For example, if speed reductions occurred following 20 GB of data usage, the carrier would describe the plan as “20 GB Unlimited.” The label would also include a description of the consequences of exceeding the data limit in the “When you exceed the data allowance” line item. The recommended changes to the 2016 mobility broadband label are shown above for the basic mobility service. In addition to the new “Choose the Number of Lines for Your Data Plan,” other proposed new text is highlighted. See Appendix 2 for the full recommendations on this section.

In the “Choose Your Data Plan” section of the 2016 labels, an item associated with the consumers ability to “Learn more about other included services/features” was included. AARP believes that this line item should continue to be included, with minor modification. The recommended change is shown below in highlighted text.

Learn more about other included services/features.

*[if applicable, at the underlined language provide a link to description of other included services and features for each of the alternatives such as voice and text, tethering and hot spots, video services, or games]*

The 2016 mobility broadband labels “Choose Your Data Plan” section included a section that addressed the availability of “Additional pricing options, plans and promotions.” Because of the requirements of Section 60504, AARP believes that this section of the label should be revised to address introductory offers and promotions. AARP’s revised label requires the service provider to identify each introductory offer or promotion in a row on the linked web page, and also specify the duration of the introductory offer, and also identify any requirements associated with the introductory offer or promotion, such as “new customers only.” This revised item is shown below and in Appendix 2.

Learn more about introductory offers and/or promotions.

*[if applicable, at the underlined language, provide a link to a description of introductory or promotional service offers; provide one row for each available option; provide price of plan available with each introductory rate, the duration of the introductory period, and the price effective following the introductory period; provide description and prices associated with promotions; specify any requirements associated with introductory rates or promotions, e.g., “new customers only”]*

As discussed above, the 2016 labels combined information regarding “additional pricing option, plans and promotions,” with the instructions indicating that that section would contain information on “plans that bundled broadband with other services.” In light of the special emphasis that Section 60504 places on introductory rates, AARP has proposed that those be separately treated, as discussed above. To address the potential for mobility broadband services

to be bundled with other services, such as fixed broadband, AARP recommends the creation of a new line in the mobility broadband form to address “additional bundle options.” This addition is shown below and in Appendix 2.

Additional bundle options [can be found here.](#)  
*[at underlined language provide a link to additional mobile broadband offerings (if applicable) that bundle mobility broadband with other services, e.g., fixed broadband]*

### 3. Affordable Connectivity Program

As was the case with fixed broadband services, AARP believes that the section of the labels that addresses service offerings should include information on the Affordable Connectivity Program. The recommended information is provided below and in Appendix 2.

Information about the Affordable Connectivity Program, which offers discounted service prices to eligible households [can be found here.](#)  
*[at the underlined language provide a link to information about the broadband services to which the Affordable Connectivity Program Applies and eligibility requirements]*

### 4. Coverage Maps

The 2016 labels also included information on mobility ISP coverage maps in the “Choose Your Data Plan” section. AARP believes that this information continues to be appropriate and does not need revision.

### 5. Charges and Common Terms to All Plans

AARP believes that the items contained in this section of the 2016 labels continues to be valid and does not need revisions.

### 6. Government Taxes and Other Government-Related Fees

While AARP believes that the 2016 label’s customer-facing label continues to be appropriate, AARP notes that the 2016 label for the mobile broadband “Consumer Disclosure Provider Instructions” omitted instructions to service providers for mobility broadband providers regarding government taxes and fees (the 2016 labels for fixed broadband included those instructions). AARP believes that the same service provider instructions should be provided to both fixed and mobile broadband providers and has made that addition in the model provider instruction label shown in Appendix 2.

## **7. Performance**

Similar to the addition proposed for the fixed broadband labels, AARP proposes that the wireless generation options shown in the label be updated to reflect 4G and 5G place as the current network generations. In addition, the clarifying language associated with speed, latency, and packet loss discussed for the fixed broadband services should also appear with the mobility broadband services. These changes are shown in Table 2 and Appendix 2.

## **8. Network Management**

AARP proposes changes similar to those associated with fixed broadband for the network management practices, with the mobile broadband labels expanding to address the FCC's 2018 transparency requirements. The changes are shown in Table 2 and Appendix 2.

## **9. Privacy and Complaints or Inquiries**

As was the case for fixed broadband, these sections will carry forward from the 2016 labels without change, as is shown in Appendix 2.

## **C. Summary on Revisions to the 2016 Labels**

The basic framework associated with the 2016 labels continues to be appropriate, but revisions are necessary to account for the provisions of Section 60504 of the IIJA and changing technology and marketing practices. As noted by the FCC's Consumer Advisory Committee (CAC) when it made its recommendations, the Commission should revisit the labels at least every two years.<sup>27</sup> Given that it has been over six years since the CAC made its recommendations, it is not surprising that elements of the 2016 labels need revision. However, as is shown in the side-by-side comparisons shown in Tables 1 and 2, the necessary revisions are modest and will better serve the objectives as outlined by Congress in Section 60504 of the IIJA.

## **V. Other Matters Raised in the NPRM**

### **A. Direct Notification**

The *NPRM* requests comment on how consumers should be notified of changes in terms of service.<sup>28</sup> AARP believes that broadband labels can play a role in this process. Along with notification of any change, consumers should be presented with the initial label and the updated label. Changes in the terms of service should not be effective immediately to give consumers the opportunity to opt-out of the changes by selecting another service provider, should they have a choice. AARP believes that a sixty-day notice period is sufficient.

---

<sup>27</sup> FCC Consumer Advisory Committee Recommendation, Broadband Consumer Disclosures, October 26, 2015, p. 7.

<sup>28</sup> *NPRM*, ¶10.

## **B. Flexibility of Label Format**

The *NPRM* requests comment on whether ISPs should be allowed flexibility in “displaying the label contents.”<sup>29</sup> AARP urges the Commission to refrain from allowing ISPs to make modifications to the label formats that the Commission ultimately approves. AARP observes that consumers are faced with a daunting variety of formats today when they consider the service offerings of various ISPs. Standardized labels will allow customers to make side-by-side comparisons and more fully understand the similarities and differences between various ISP offerings. Allowing ISPs to develop non-standardized labels will undermine consumers’ ability to make side-by-side comparisons, undermining the effectiveness of the labels.

The *NPRM* also requests comment on ISPs being required to provide the labels in a machine-readable format.<sup>30</sup> AARP believes that this requirement is appropriate as it will better enable side-by-side comparisons and would promote the creation of comparison shopping tools by third parties. Buying broadband is a complex process, and not all consumers will have the same level of expertise regarding the characteristics of broadband services. AARP believes that by requiring the disclosure of the information recommended in these comments, in a machine-readable format consistent with the 2016 labels, the FCC will provide a solid foundation for the use of the data to generate additional shopping tools tailored by third parties to meet the needs of their constituencies. For example, AARP could envision using the data to develop shopping tools for older Americans to help cut through jargon and confusing language that can often be used to describe these services.

## **C. Display Location**

The *NPRM* requests comment on display locations. AARP agrees that ISPs should be required to “prominently display the labels in a manner that is easily accessible to consumers and in the format prescribed by the Commission.”<sup>31</sup> AARP also believes that the Commission should require that the labels be identified using the same language for every fixed or mobile broadband provider. Based on the format of the 2016 labels AARP believes that the following language should be used by all ISPs.

<b>Broadband Facts</b>	<b>Broadband Facts</b>
Fixed broadband consumer disclosure.	Mobile broadband consumer disclosure.

AARP believes that the *NPRM*’s proposal to require the placement of the labels on the ISP’s web site is appropriate, so that consumers will have access to that information when “a consumer

---


<sup>29</sup> *NPRM*, ¶11.

<sup>30</sup> *NPRM*, ¶11.

<sup>31</sup> *NPRM*, ¶13.

browsers service options.”<sup>32</sup> The same requirement should be imposed on apps that are used by ISPs to sell services. AARP believes that the Commission should require the links associated with the labels to be prominently displayed, using a type face scaled at a level similar to that associated with the typeface used to inform consumers about other elements of the plan. AARP has created a sample based on offerings of the three major wireless carriers to illustrate appropriate placement of a link to the mobile broadband labels. The language shown above has been added to each of the three examples shown in Table 3. AARP believes that it is important that the link to the label be placed near the top of each service description.

**Table 3: Appropriate Placement of Link to Label on ISP Web Page (Verizon, T-Mobile, and AT&T Offerings Shown)**

<p><b>5G Start</b> Just the basics.</p> <p><b>\$35</b> /line per month. Plus taxes &amp; fees.</p> <p><b>\$45</b> without paper-free billing and Auto Pay.</p> <p><b>Broadband Facts</b> Mobile broadband consumer disclosure.</p> <p><b>5G access</b></p>	<p><b>Magenta®</b></p> <p><b>\$40</b> /line</p> <p>Pricing for 3 lines with AutoPay, with 3rd line free. (\$120/mo.) Taxes &amp; fees included.</p> <p><b>Broadband Facts</b> Mobile broadband consumer disclosure.</p> <p><b>Start shopping &gt;</b></p>	<p>5G included</p> <p>AT&amp;T UNLIMITED EXTRA® PLAN</p> <p><b>\$40</b> /mo. per line when you get 4 lines</p> <p><b>Broadband Facts</b> Mobile broadband consumer disclosure.</p> <p>Here's what you'll get: ^</p> <p> Unlimited talk, text &amp; data AT&amp;T may temporarily slow data speeds if the network is busy.</p>
--	---	--

Likewise, AARP supports the availability and distribution of labels in settings outside of the ISP's web site. In retail stores labels could be provided in printed material or in interactive kiosks that are increasingly common in retail settings. Regarding telemarketing calls, AARP agrees with the *NPRM*'s suggestion that customers be given the opportunity to receive the labels via email or text message, at the discretion of the customer, prior to making a purchase.<sup>33</sup>

**D. Accessibility Issues**

The *NPRM* requests comments on whether the Commission’s previous conclusion, based on recommendations of the Commission’s Consumer Advisory Counsel, that labels satisfy the legal requirements associated with the Americans with Disabilities Act and the guidance associated

<sup>32</sup> *NPRM*, ¶13.

<sup>33</sup> *NPRM*, ¶13.

with the Web Accessibility Initiative.<sup>34</sup> AARP agrees that these requirements continue to be appropriate.

## **E. Enforcement Issues**

The *NPRM* requests comment on the extent of the Commission’s authority under the Infrastructure Act to enforce the broadband consumer labels as an entirely separate requirement from the transparency rules.<sup>35</sup> AARP believes that the authority granted by Congress to “promulgate regulations to require the display of broadband consumer labels”<sup>36</sup> clearly indicates a set of requirements that is separate from the Commission’s existing transparency rules. For example, the explicit direction of Congress regarding introductory rates is not associated with the existing transparency rules.

The *NPRM* requests comment on how the Commission should evaluate the accuracy of the information presented in the broadband consumer labels.<sup>37</sup> AARP believes that the Commission should evaluate labels directly, and also restructure its complaint page to encourage the submission of information regarding information associated with the broadband labels, and ISP practices associated with the distribution and use of the labels. The Commission could also directly educate the public regarding the labels to help shape consumer expectations regarding what consumers should be seeing in the labels and when and where they should be presented with the labels by ISPs. The use of Commission’s web site, social media accounts, and press releases could all contribute to the effectiveness of the labels and the Commission’s ability to track ISP practices associated with the labels.

## **F. Implementation**

ISPs have been aware that a label requirement would be forthcoming by November 2022 for the last four months, thus AARP does not believe that an extended timeline for implementation is required. AARP believes that the “six months following publication in the Federal Register of the . . . OMB’s approval of the adopted rules”<sup>38</sup> is sufficient.

## **G. Cost Effectiveness**

The *NPRM* requests comment related to the cost-effectiveness of the labels. AARP believes that ISPs produce all of the data necessary for the 2016 labels, as updated by AARP, as part of their normal course of business. AARP believes that the benefits to consumers in the form of enhanced ability to engage in comparison shopping and to directly compare the rates, terms, and conditions of broadband services are substantial, and will generate significant benefits for

---

<sup>34</sup> *NPRM*, ¶14.

<sup>35</sup> *NPRM*, ¶16.

<sup>36</sup> IIJA, Section 60504.

<sup>37</sup> *NPRM*, ¶17.

<sup>38</sup> *NPRM*, ¶19.

consumers. Given the widespread adoption of broadband services, even the ability of consumers to save a few dollars on their bills through enhanced comparison shopping capabilities and greater transparency would potentially generate billions of dollars in annual savings.

## **H. Digital Equity**

The *NPRM* requests comments on how the labels can be used to promote digital equity. AARP believes that the Commission can take some actions that will help achieve this objective. As discussed above, compliance with the ADA and WEI frameworks will help ensure that those with disabilities will benefit from the labels. Alternatively, requiring the labels to be produced in any language that an ISP currently uses for marketing its services would further promote the goals of digital equity. The Commission can also directly promote this objective by requiring the availability of the labels in machine-readable format, so as to encourage the utilization of the label information by third-parties who may have digital equity goals. Finally, the Commission should publish the label information directly on its web site and develop its own comparison shopping tool to assist consumers. The integration of information from the labels with the Commission's future broadband map would be useful in making information from the labels available nationwide, including in rural and Tribal areas.

## **VI. Conclusion**

AARP believes that the 2016 broadband labels provide an appropriate foundation upon which the Commission can build to satisfy the requirements of the Infrastructure Investment and Jobs Act's direction regarding consumer broadband labels.

While the basic framework associated with the 2016 labels continues to be appropriate, the revisions described above, and in the appendices to these comments, are necessary to account for both the requirements of Section 60504 of the *IIJA* and changing technology and marketing practices. AARP encourages the Commission to update the labels using AARP's recommendations. In addition, AARP encourages the Commission to maintain and update the labels on an ongoing basis. As noted by the FCC's Consumer Advisory Committee (CAC) when it made its recommendations, the Commission should revisit the labels at least every two years.<sup>39</sup> By now revising the labels, and updating the labels over time, the Commission will satisfy the objectives outlined by Congress in Section 60504 of the Infrastructure Investment and Jobs Act.

---

<sup>39</sup> FCC Consumer Advisory Committee Recommendation, Broadband Consumer Disclosures, October 26, 2015, p. 7.



## **Appendix 1 to AARP Comments in CG Docket No. 22-2**

### **Fixed Broadband Consumer Disclosure Labels**

# **Fixed Broadband Consumer Disclosure Blank Label**

# Broadband Facts

Fixed broadband consumer disclosure

## Choose Your Service Data Plan for

Monthly charge for month-to-month plan

[Learn more about introductory offers and/or promotions](#) for month-to-month plan.

Monthly charge for 2 year contract plan

[Learn more about introductory offers or promotions](#) for 2 year contract plan.

Click here for [service options](#) that combine fixed broadband service with other services like video content, wireless services, or voice telephone service.

Information about the Affordable Connectivity Program, which offers discounted service prices to eligible households [can be found here](#).

## Data Usage and Overage Charges

Data included with monthly charge

[Speed reductions if data usage cap exceeded?](#)

[Charges for additional data usage](#)

## Other Charges and Terms

Optional modem or gateway lease—Customers may use their own modem or gateway; click here for [our policy](#)

Other monthly fees

One-time fees

**Government Taxes and Other Government-Related Fees May Apply:** Varies by location

[Other services on network](#)

## Performance—[Individual experience may vary](#)

Typical speed downstream [\(higher numbers are superior\)](#)

Typical speed upstream [\(higher numbers are superior\)](#)

Typical latency [\(lower numbers are superior\)](#)

Typical packet loss [\(lower percentages are superior\)](#)

## Network Management

[Blocking of traffic?](#)

[Throttling of traffic?](#)

[Paid prioritization of traffic?](#)

[Affiliated prioritization of traffic?](#)

[Congestion management?](#)

Application-specific network management practices?

Subscriber-triggered network management practices?

[Device attachment restrictions?](#)

[Security Policy](#)

More [details on network management](#).

## Privacy

See our [privacy policy](#)

## Complaints or Inquiries

To contact us: [online](#)/(123)456-7890

To submit complaints to the FCC:

[online](#)/(888)225-5322

Learn more about the [terms used on the form and other relevant information](#) at the FCC's website.

# **Fixed Broadband Consumer Disclosure Provider Instructions**

# Broadband Facts

Fixed broadband consumer disclosure

## Choose Your Service Data Plan for *[provide name of speed tier offered]*

Monthly charge for month-to-month plan \$[ ]

*[provide price of stand-alone broadband service on a month-to-month basis excluding all promotions or introductory rates; identify plan requirements such as “requires paperless billing,” “requires electronic payment,” “requires autopay”]*

Learn more about [introductory offers and/or promotions](#) for month-to-month plan.

*[if applicable, at the underlined language, provide a link to a description of service offers; provide one row for each available option; provide price of plan available with each introductory rate, the duration of the introductory period, and the price effective following the introductory period; provide description and prices associated with promotions; specify any requirements associated with introductory rates or promotions, e.g., “new customers only”]*

Monthly charge for [ ] contract plan \$[ ]

*[if applicable, identify length of available long-term contract—provide one row for each available option; provide price of stand-alone broadband service available under each long-term contract option excluding all promotions or introductory rates; identify plan requirements such as “requires paperless billing,” “requires electronic payment,” “requires autopay”]*

Learn more about [introductory offers or promotions](#) for [ ] contract plan.

*[if applicable, at the underlined language, provide a link to a description of service offers; provide one row for each available option; provide price of plan available with each introductory rate, the duration of the introductory period, and the price effective following the introductory period; provide description and prices associated with promotions; specify any requirements associated with introductory rates or promotions, e.g., “new customers only”]*

Click here for [service options](#) that combine fixed broadband service with other services like video content, wireless services, or voice telephone service.

*[if applicable, at the underlined language, provide a link to a description of service offers that combine fixed broadband with other services]*

Information about the Affordable Connectivity Program, which offers discounted service prices to eligible households [can be found here](#).

*[at the underlined language provide a link to information about the broadband services to which the Affordable Connectivity Program Applies and eligibility requirements]*

## Data Usage and Overage Charges

Data included with monthly charge [ ]GB

*[if applicable, identify the monthly data allowance with this plan for service at the speed identified, prior to any overage charges, speed reductions, or throttling]*

Speed reductions if data usage cap is exceeded? [Yes/No]

*[if applicable, identify the speed reductions associated with exceeding the data allowance; if multiple thresholds exist, provide one row for each]*

Charges for additional data usage \$[ ]

*[provide one row for increment of additional data, e.g., “each additional 100 GB”; if applicable, identify additional charges if the monthly data allowance is exceeded]*

<b>Other Charges and Terms</b>	
Optional modem or gateway lease—Customers may use their own modem or gateway; click here for <a href="#">our policy</a>	\$[ ]/month
<i>[at underlined language provide a link to the company's policy with respect to customers using their own equipment; provide the monthly rental fee for any equipment available for rent]</i>	
Other monthly fees	
<i>[identify any monthly fees that the company chooses to impose in connection with the purchase of broadband service; do not include taxes and other fees associated with government programs]</i>	
One-time fees	
<i>[provide one row for each fee; identify any one-time fees that the company chooses to impose in connection with the purchase of broadband service, e.g., installation fees and activation fees. If applicable, identify any fees that will be imposed if the customer cancels broadband service before the end of a long-term contract and provide a link to a full explanation of when such fees would be triggered; if applicable, include a statement that a deposit may be required based on credit history other factors]</i>	
<i>[provide name of and amount of each one-time fee in a row]</i>	
<b>Government Taxes and Other Government-Related Fees May Apply:</b> Varies by location	
<i>[provide this disclaimer using this language to notify consumer that additional taxes and fees mandated by, or attributable to, government programs will be imposed—specific taxes and fees need not be identified]</i>	
<a href="#">Other services on network</a>	
<i>[if applicable, in this section provide a brief description of any non-BIAS services offered by the company that might cause the customer to experience reduced performance of their broadband service; at underlined language provide a link to a full explanation of when such a situation would occur and details regarding the anticipated effect on broadband performance]</i>	
<b>Performance—</b> <a href="#">Individual experience may vary</a>	
<i>[at underlined language provide a link to a full discussion of network performance metrics]</i>	
Typical speed downstream (higher numbers are superior)	[ ]Mbps
<i>[identify typical (average) peak usage period download speeds for this tier of service, consistent with FCC guidance]</i>	
Typical speed upstream (higher numbers are superior)	[ ]Mbps
<i>[identify typical (average) peak usage period upload speeds for this tier of service, consistent with FCC guidance]</i>	
Typical data delay or latency (lower numbers are superior)	[ ] milliseconds
<i>[identify typical peak usage period latency for this tier of service, consistent with FCC guidance]</i>	
Typical packet loss (lower percentages are superior)	[ ] %
<i>[identify typical peak usage period packet loss for this tier of service, consistent with FCC guidance]</i>	
<b>Network Management</b>	
Blocking of traffic?	Yes/No
<i>[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies blocking practices, when blocking occurs, and the effect the blocking practices could have on the performance of the service]</i>	

Throttling of traffic?	Yes/No
<i>[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies throttling practices, when throttling occurs, and the effect the throttling practices could have on the performance of the service]</i>	
Paid prioritization of traffic?	Yes/No
<i>[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies paid prioritization practices, how paid prioritization occurs, and the effect the paid prioritization practices could have on the performance of the service; the full discussion should include a description of the techniques associated with paid prioritization including use of techniques such as traffic shaping, prioritization, or resource reservation in exchange for consideration, monetary or otherwise]</i>	
Affiliated prioritization of traffic?	Yes/No
<i>[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies affiliated prioritization practices, how affiliated prioritization occurs, and the effect the affiliated prioritization practices could have on the performance of the service; the full discussion should include a description of the techniques associated with affiliated prioritization including use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate, including identification of the affiliate]</i>	
Congestion management?	Yes/No
<i>[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies of congestion management practices; include the types of traffic subject to the practices; the purposes served by the practices; the practices' effects on end users' experience; criteria used in practices, such as indicators of congestion that trigger a practice, including any usage limits triggering the practice, and the typical frequency of congestion; usage limits and the consequences of exceeding them; and references to engineering standards]</i>	
Application-specific network management practices?	Yes/No
<i>[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies application-specific network management practices, when such practices are triggered, and the effect such practices could have on performance]</i>	
Subscriber-triggered network management practices?	Yes/No
<i>[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies subscriber-triggered network management practices, when such practices are triggered, and the effect such practices could have on performance]</i>	
<a href="#">Device attachment restrictions?</a>	Yes/No
<i>[answer yes or no; if yes, provide a brief description and provide a link to a full discussion that identifies the company's restrictions on device attachment]</i>	
<a href="#">Security Policy</a>	
<i>[provide a link to the company's policy on security]</i>	
More <a href="#">details on network management</a> .	
<i>[provide a link to the company's full disclosure of network management practices]</i>	
<b>Privacy</b>	See our <a href="#">privacy policy</a>
<i>[provide a link to the company's privacy policy for broadband services]</i>	
<b>Complaints or Inquiries</b>	To contact us: <a href="#">online</a> /(123)456-7890 To submit complaints to the FCC: <a href="#">online</a> /(888)225-5322

*[for company, at underlined language provide a link to the primary customer service web page; provide a phone number for the company's customer service center]*

*[for the FCC, at the underlined language provide a link to the FCC's complaint center; provide the phone number for the FCC's complaint center]*

Learn more about the [terms used on the form and other relevant information](#) at the FCC's website.

*[at underlined language provide a link to the FCC's glossary web page]*



## **Appendix 2 to AARP Comments in CG Docket No. 22-2**

### **Mobile Broadband Consumer Disclosure Labels**

# **Mobile Broadband Consumer Disclosure Blank Label**

# Broadband Facts

Mobile broadband consumer disclosure

## Device Compatibility

If you want to use your existing mobile device, learn more about [compatibility](#).

If you want to obtain a device, learn more about [prices and other options](#).

## Choose the [number of lines for your Data Plan](#).

	High Speed Data Allowance Per Month for <a href="#">Line Plan</a>		
	GB	GB	GB
<b>Monthly Charge—</b> These prices do not include costs for obtaining a device from us.			
<b>When you exceed the data allowance</b>			

Learn more about [other included services/features](#).

Learn more about [introductory offers and/or promotions](#).

Additional bundle options [can be found here](#).

Information about the Affordable Connectivity Program, which offers discounted service prices to eligible households [can be found here](#).

[Coverage Map](#)

## Charges and Common to All Plans

Monthly fees

One-time fees

**Government Taxes and Other Government-Related Fees May Apply:** Varies by location

## Performance—[Individual experience may vary](#)

G	G
Typical Speed <a href="#">(higher numbers superior)</a>	Typical Speed <a href="#">(higher numbers superior)</a>
Typical Latency <a href="#">(lower numbers superior)</a>	Typical Latency <a href="#">(lower numbers superior)</a>
Typical Packet loss <a href="#">(lower percent superior)</a>	Typical Packet loss <a href="#">(lower percent superior)</a>

## Network Management

[Blocking of traffic?](#)

[Throttling of traffic?](#)

[Paid prioritization of traffic?](#)

[Affiliated prioritization of traffic?](#)

[Congestion management?](#)

Application-specific network management practices?

Subscriber-triggered network management practices?

[Device attachment rules](#).

[Security policy](#).

More [details on network management](#).

## Privacy

See our [privacy policy](#)

## Complaints or Inquiries

To contact us: [online](#)/(123)456-7890

To submit complaints to the FCC:

[online](#)/(888)225-5322

Learn more about the [terms used on the form and other relevant information](#) at the FCC's website.

# **Mobile Broadband Consumer Disclosure Provider Instructions**

# Broadband Facts

Mobile broadband consumer disclosure

## Device Compatibility

If you want to use your existing mobile device, learn more about [compatibility](#).

*[at the underlined language provide a link regarding compatibility of devices if the customer brings their own device]*

If you want to obtain a device, learn more about [prices and other options](#).

*[at underlined language provide a link to prices and other options for customers who wish to obtain a device from the provider]*

## Choose the [Number of Lines for Your Data Plan](#).

	High Speed Data Allowance Per Month for <a href="#">[ ] Line Plan</a>		
	<b><a href="#">[ ] GB ["Unlimited"]</a></b>	<b><a href="#">[ ] GB ["Unlimited"]</a></b>	<b><a href="#">[ ] GB ["Unlimited"]</a></b>
	<i>[if plans are offered in line grouping (e.g., 1 line, 2 line, etc.), at the underlined language provide link to the number of lines and provide this table; for each line grouping identify the monthly high speed data allowance associated with your basic by-the-GB plan; for basic "unlimited" plans, identify the plan as "unlimited" and use the <a href="#">[ ] GB</a> to report the data usage before reductions of data speeds, overage charges, or other consequences occur]</i>	<i>[if plans are offered in line grouping (e.g., 1 line, 2 line, etc.), at the underlined language provide link to the number of lines and provide this table; for each line grouping identify the monthly high speed data allowance associated with a popular by-the-GB plan; for "unlimited" plans, identify the plan as "unlimited" and use the <a href="#">[ ] GB</a> to report the data usage before reductions of data speeds, overage charges, or other consequences occur]</i>	<i>[if plans are offered in line grouping (e.g., 1 line, 2 line, etc.), at the underlined language provide link to the number of lines and provide this table; for each line grouping identify the monthly high speed data allowance associated with a popular by-the-GB plan; for "unlimited" plans, identify the plan as "unlimited" and use the <a href="#">[ ] GB</a> to report the data usage before reductions of data speeds, overage charges, or other consequences occur]</i>
<b>Monthly Charge—</b> These prices do not include costs for obtaining a device from us.	<b><a href="#">\$[ ]</a></b>	<b><a href="#">\$[ ]</a></b>	<b><a href="#">\$[ ]</a></b>
	<i>[provide non-promotional, non-introductory price of the plan with this data allowance on a month-to-month basis]</i>	<i>[provide non-promotional, non-introductory price of the plan with this data allowance on a month-to-month basis]</i>	<i>[provide non-promotional, non-introductory price of the plan with this data allowance on a month-to-month basis]</i>
<b>When you exceed the data allowance</b>	<b><a href="#">[ ]</a></b>	<b><a href="#">[ ]</a></b>	<b><a href="#">[ ]</a></b>

	<i>[if applicable, identify impact on data speeds or additional charges or other outcomes if the monthly data allowance for this plan is exceeded; for “unlimited” plans report impacts based on data usage thresholds that trigger the change in service performance or additional charges]</i>	<i>[if applicable, identify impact on data speeds or additional charges or other outcomes if the monthly data allowance for this plan is exceeded; for “unlimited” plans report impacts based on data usage thresholds that trigger the change in service performance or additional charges]</i>	<i>[if applicable, identify impact on data speeds or additional charges or other outcomes if the monthly data allowance for this plan is exceeded; for “unlimited” plans report impacts based on data usage thresholds that trigger the change in service performance or additional charges]</i>
Learn more about <a href="#">other included services/features</a> . <i>[if applicable, at the underlined language provide a link to description of other included services and features for each of the alternatives such as voice and text, tethering and hot spots, video services, or games]</i>			
Learn more about <a href="#">introductory offers and/or promotions</a> . <i>[if applicable, at the underlined language, provide a link to a description of service offers; provide one row for each available option; provide price of plan available with each introductory rate, the duration of the introductory period, and the price effective following the introductory period; provide description and prices associated with promotions; specify any requirements associated with introductory rates or promotions, e.g., “new customers only”]</i>			
Additional bundle options <a href="#">can be found here</a> . <i>[at underlined language provide a link to additional mobile broadband offerings (if applicable) that bundle mobility broadband with other services, e.g., fixed broadband]</i>			
Information about the Affordable Connectivity Program, which offers discounted service prices to eligible households <a href="#">can be found here</a> . <i>[at the underlined language provide a link to information about the mobile services to which the Affordable Connectivity Program Applies and eligibility requirements]</i>			
<a href="#">Coverage Map</a> <i>[at underlined language provide a link to your coverage map]</i>			
<b>Charges and Common Terms to All Plans</b>			
Monthly fees <i>[identify any monthly fees that the company chooses to impose in connection with the purchase of your company’s wireless broadband service; do not include taxes and other fees associated with government programs]</i>			
	<i>[provide name of and amount of each monthly fee in a separate row]</i>		<i>[\$ ]</i>
One-time fees <i>[provide one row for each fee; identify any one-time fees that the company chooses to impose in connection with the purchase of broadband service, e.g., activation fees. If applicable, identify any fees that will be imposed if the customer cancels the mobile broadband service before the end of a long-term contract and provide a link to a full explanation of when such fees would be triggered]</i>			
	<i>[provide name of and amount of each one-time fee in a separate row]</i>		<i>[\$ ]</i>
<b>Government Taxes and Other Government-Related Fees May Apply:</b> Varies by location			

[provide this disclaimer using this language to notify consumer that additional taxes and fees mandated by, or attributable to, government programs will be imposed—specific taxes and fees need not be identified]

## Performance—[Individual experience may vary](#)

[at underlined language provide a link to a full discussion of network performance metrics]

<p><b>[ ] G</b> [identify the primary network technology for the plan (e.g., 4G, 5G)]</p>	<p><b>[ ] G</b> [identify the primary network technology for the plan (e.g., 4G, 5G)]</p>
<p><b>Typical Speed (higher numbers superior)</b> [ ] Mbps downstream/ [ ] Mbps upstream [identify typical peak usage period download and upload speed for this network technology, consistent with FCC guidance]</p>	<p><b>Typical Speed (higher numbers superior)</b> [ ] Mbps downstream/ [ ] Mbps upstream [identify typical peak usage period download and upload speed for this network technology, consistent with FCC guidance]</p>
<p><b>Typical Latency (lower numbers superior)</b> Less than [ ] milliseconds [identify typical peak usage period latency for this network technology, consistent with FCC guidance]</p>	<p><b>Typical Latency (lower numbers superior)</b> Less than [ ] milliseconds [identify typical peak usage period latency for this network technology, consistent with FCC guidance]</p>
<p><b>Typical Packet loss (lower percent superior)</b> [ ] % [identify typical peak usage period latency for this network technology, consistent with FCC guidance]</p>	<p><b>Typical Packet loss (lower percent superior)</b> [ ] % [identify typical peak usage period latency for this network technology, consistent with FCC guidance]</p>

## Network Management

Blocking of traffic? Yes/No  
[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies blocking practices, when blocking occurs, and the effect the blocking practices could have on the performance of the service]

Throttling of traffic? Yes/No  
[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies throttling practices, when throttling occurs, and the effect the throttling practices could have on the performance of the service]

Paid prioritization of traffic? Yes/No  
[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies paid prioritization practices, how paid prioritization occurs, and the effect the paid prioritization practices could have on the performance of the service; the full discussion should include a description of the techniques associated with paid prioritization including use of techniques such as traffic shaping, prioritization, or resource reservation in exchange for consideration, monetary or otherwise]

Affiliated prioritization of traffic? Yes/No  
[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies affiliated prioritization practices, how affiliated prioritization occurs, and the effect the affiliated prioritization practices could have on the performance of the service; the full discussion should include a description of the techniques associated with affiliated prioritization including use of

techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate, including identification of the affiliate]	
Congestion management?	Yes/No
[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies of congestion management practices; include the types of traffic subject to the practices; the purposes served by the practices; the practices' effects on end users' experience; criteria used in practices, such as indicators of congestion that trigger a practice, including any usage limits triggering the practice, and the typical frequency of congestion; usage limits and the consequences of exceeding them; and references to engineering standards]	
Application-specific network management practices?	Yes/No
[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies application-specific network management practices, when such practices are triggered, and the effect such practices could have on performance]	
Subscriber-triggered network management practices?	Yes/No
[answer yes or no; if yes, provide a brief description and a link to a full discussion that identifies subscriber-triggered network management practices, when such practices are triggered, and the effect such practices could have on performance]	
<u>Device attachment rules.</u>	
[provide a link to the company's policy on device attachment]	
<u>Security Policy</u>	
[provide a link to the company's policy on security]	
More <u>details on network management.</u>	
[provide a link to the company's full disclosure of network management practices]	
Privacy	See our <a href="#">privacy policy</a>
[provide a link to the company's privacy policy for broadband services]	
Complaints or Inquiries	To contact us: <a href="#">online</a> /(123)456-7890 To submit complaints to the FCC: <a href="#">online</a> /(888)225-5322
[for company, at underlined language provide a link to the primary customer service web page; provide a phone number for the company's customer service center]	
[for the FCC, at the underlined language provide a link to the FCC's complaint center; provide the phone number for the FCC's complaint center]	
Learn more about the <a href="#">terms used on the form</a> and <a href="#">other relevant information</a> at the FCC's website.	
[at underlined language provide a link to the FCC's glossary web page]	