

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

**In the Matter of**

**Empowering Broadband Consumers Through Transparency**

**CG Docket No. 22-2**



**COMMENTS OF CONSUMER REPORTS  
(with PUBLIC KNOWLEDGE and COMMON SENSE MEDIA)  
March 9, 2022**

Consumer Reports (CR) is an independent, nonprofit member organization that works side by side with consumers for truth, transparency, and fairness in the marketplace. In defense of those principles, CR strongly encourages the Federal Communications Commission (FCC) to develop a clear, strong broadband label that effectively serves consumers' needs as mandated by Congress.<sup>1</sup> CR is joined in these comments by Public Knowledge, a nonprofit advocacy group that promotes freedom of expression, an open internet, and access to affordable communications tools and creative works, and Common Sense Media, the nation's leading independent nonprofit organization dedicated to helping kids and families thrive in a world of media and technology.

In the Notice of Proposed Rulemaking (NPRM) we comment upon today, the Commission proposes to implement a requirement that internet service providers (ISPs) display labels to disclose to consumers certain information about prices, introductory rates, data allowances, broadband speeds, and management practices, among other items.<sup>2</sup> Because Congress mandated this action, there is no doubt that ISPs will display a broadband label of some sort in the future; the work of this proceeding is to determine whether the label—a final draft of which was completed in 2016—should be modified both in content and format, and where the new label should be displayed to best inform consumers.

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<sup>1</sup> The Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429, § 60504(a) (2021)

<sup>2</sup> Notice of Proposed Rulemaking, *Empower Broadband Consumers Through Transparency*, FCC CG Docket No. 22-2 (January 27, 2022), *hereafter* NPRM.

When consumers subscribe to internet service it is not a one-time purchase, but a recurring service that they pay for each month. And for some consumers, digital literacy is a real barrier to internet access because of an unfamiliarity with technical terms that, if understood, would benefit their decision on what sort of internet service plan best suits their needs.

Tweaking the 2016 label’s content and complementing it with additional, complementary resources as we suggest below will improve digital literacy. But the broadband label will only be successful if millions of consumers are actually exposed to it on a regular, recurring basis—just like the monthly bill—versus a brief, one-time episode at the point of sale. Therefore, CR strongly recommends that the Commission require that the label occur, of course, at the initial point of sale, but also on each and every monthly bill that consumers receive, and updated as necessary to reflect any service changes. Adopting this requirement will not only improve the ubiquity of the broadband label, it will also allow consumers to become more familiar with it, and assist them to clearly track changes in their broadband expenses—and, where possible, call to negotiate rates or switch services over time.

In the wake of the COVID-19 pandemic, consumers increasingly rely on access to the internet—more than ever before—as the fundamental, connective infrastructure for everything from education and healthcare to e-commerce and community. Last year, a nationally-representative Consumer Reports survey found that 76 percent of Americans agreed that internet service is as important as water and electricity.<sup>3</sup> Three out of four consumers also said they need to access the internet, or use other services provided by their ISP (internet service provider), without disruption, to carry out their daily activities seven days a week.<sup>4</sup> Finally, another nationally-representative CR survey conducted last summer revealed that 43 percent of Americans who have broadband service in their household say they are currently using the internet *more* in their household compared to before the onset of the COVID-19 pandemic—let alone since 2016.<sup>5</sup>

Consumers understand that broadband internet access is essential. Yet, despite how crucial the service has become to daily life, consumers often find themselves stuck with unreliable or slow internet service, data caps, quietly expiring promotional rates, and bills filled with mysterious fees, which make it difficult to budget and to comparison shop (for those consumers who have a choice of provider).<sup>6</sup> And for still more consumers, some bills for bundled

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<sup>3</sup> *Survey summary available at:* <https://advocacy.consumerreports.org/wp-content/uploads/2021/03/2021-Feb-Broadband-Survey.pdf>

<sup>4</sup> *Id.*

<sup>5</sup> *Survey available at:* [https://advocacy.consumerreports.org/wp-content/uploads/2021/08/CR\\_Broadband-Survey\\_8\\_2021\\_VF.pdf](https://advocacy.consumerreports.org/wp-content/uploads/2021/08/CR_Broadband-Survey_8_2021_VF.pdf)

<sup>6</sup> In a Consumer Reports “Share Your Story” campaign conducted last year, CR members shared stories of confusing advertising practices and promotional rates, and some members reported how fees make it difficult for them to understand the costs associated with their internet service. *See* <https://digital-lab.consumerreports.org/2021/11/15/an-analysis-of-broadband-isp-practices>.

service packages fail to even list a separate line item for the cost of internet service, leaving those consumers wondering just how much they are paying for broadband each month.

Consumers will benefit greatly from the kind of common-sense transparency—the likes of which have been standard for essentials like cars since the 1950s and packaged foods since the 1990s—that this label will offer.<sup>7</sup> Transparency helps empower consumers to, at a minimum in the ISP marketplace, discover the price they are paying for a product and its features, and for some, compare competing products to help make informed purchasing decisions.

## **I. DISPLAY LOCATION AND FORMAT**

The ultimate effectiveness of the broadband label will depend heavily on consumers actually seeing it, and understanding its contents. We anticipate many comments will debate the particulars of what sorts of and how much information the label should contain—and Consumer Reports will certainly contribute to that conversation below. But unless consumers regularly encounter the broadband label, what is and what is not displayed in it, or what format the label takes will not matter. Therefore, CR strongly recommends the label be included in every new and existing consumer’s monthly bill. This approach represents the best way to expose the largest number of consumers to the label, and affords opportunities to update consumers on any changes of service (expiring promotions, fee increases, new features, increased speeds, etc.).

CR agrees with the Commission that the 2016 label created and endorsed by the FCC’s Consumer Advisory Committee (CAC) is the logical format to adopt, with minor additional features discussed later in this section.<sup>8</sup> We further agree that the label should be required at the point of sale, which for many consumers will mean online on an ISP’s website.<sup>9</sup> A mere link taking consumers away from the advertised plans to view the label is not sufficient. All advertised service plans on an ISP’s website should display the label in close proximity, allowing for pop-outs if necessary to display the label in a larger format. The Commission should also consider requiring linkable versions of the label displayed in other languages, as recent experience with the Emergency Broadband Benefit program (now the Affordability Connectivity Program) reminded us that consumers can only understand a label (in this case) written in their language.

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<sup>7</sup> Window stickers (aka the “Monroney sticker” named after Senator Monroney of Oklahoma) were first required for new automobiles by the Automobile Information Disclosure Act of 1958 (15 U.S. Code § 1231-1233); Nutrition Facts labels were enacted as part of the Nutrition Labeling and Education Act of 1990 (Public Law 101-535).

<sup>8</sup> NPRM at ¶ 23.

<sup>9</sup> NPRM at ¶ 26.

### ***ISP Service Plan and Broadband Label Archive***

Because plans change and some are no longer offered (but some consumers remain subscribed to those legacy plans), all current and past plans should be displayed on a separate webpage—an archive—with their corresponding labels, within a reasonable backwards-looking timeframe. Plans listed in the archive should be categorized as current or past. Furthermore, a link to this company-specific archive should be prominently displayed either within the label or close proximity on the page advertising an ISP’s service offerings. A searchable archive (i.e., allow consumers to insert the service plan name to match it to the correct broadband label) would permit ISPs’ flexibility to refer consumers to it in order to examine the label and the details about the service plan to which they are currently subscribed, even if that plan is no longer offered.

If all ISPs maintained an archive of plans and labels as we suggest, consumers who enjoy choice for broadband would be able to easily compare service offerings.<sup>10</sup> Uniform labels viewed side-by-side facilitate the goal of comparison shopping contemplated by the law and the NPRM. And even for those new or existing consumers stuck with a monopoly provider, an archive would present an unadulterated view of their ISP’s service plans, and offer an apples-to-apples comparison between those choices.

### ***Require the Broadband Label on Monthly Consumer Bills***

In addition to the basic requirements suggested above, the single best way to ensure the success and visibility of the broadband label would be to require its appearance on consumers’ monthly service bills. The NPRM contemplates this possibility, and the Commission would best serve the policy goals of mandating the broadband label by further mandating its display on bills.<sup>11</sup> Failure to do so and relying solely on a point of sale disclosure of the label would result in many existing consumers being unaware of the label’s existence. And new customers who might be exposed to the label at the point of purchase may only see it that one time (barring return visits to the ISP’s website which we feel is an unlikely occurrence once a consumer subscribes to a plan). Moreover, if their plan changes, the label they initially relied upon may no longer be hosted on the ISP’s website—unless, of course, the Commission adopts our idea of an archived resource.

The need to require the broadband label on monthly bills is further supported by the lack of uniformity amongst ISP bills, and the absence of the very information on some bills that

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<sup>10</sup> In a nationally-representative CR survey conducted last year, 55 percent of Americans reported having more than one choice of broadband provider. *Survey available at:* [https://advocacy.consumerreports.org/wp-content/uploads/2021/08/CR\\_Broadband-Survey\\_8\\_2021\\_VF.pdf](https://advocacy.consumerreports.org/wp-content/uploads/2021/08/CR_Broadband-Survey_8_2021_VF.pdf)

<sup>11</sup> NPRM at ¶ 26.

would be displayed on the future label. Analyzing consumer bills voluntarily submitted to CR as part of the pilot project in advance of our Fight for Fair Internet (formerly known as Let’s Broadband Together) project launched last year confirms these assertions.<sup>12</sup>

For example, most ISPs do not print the download or upload speeds (either advertised or actual) for the service plan paid for by the consumer on the bill, though this key performance data is prominently featured on the 2016 draft broadband label.<sup>13</sup> To be fair, some ISPs include the “up to” download speed, but not the upload speed. Some consumers of a bundled service plan (e.g. video, internet, and/or telephone) are not able to locate a line item detailing the cost for internet service, because there is not one to be found on the bill.<sup>14</sup>

To be sure, the broadband label would make clear what the charge for internet service is, even if bundled together with other services. Including the broadband label on ISP bills would also give consumers a reminder of expiring promotions, rate changes, and fee increases on a monthly basis, versus a one-time event at the point of sale. There is no better way to boost the visibility and success of the broadband label than by requiring its display on monthly ISP bills.

### ***Label Format***

A major overhaul of the broadband label’s format and appearance is not necessary. As the NPRM points out, the 2016 label was part of a comprehensive, collaborative effort between industry and public interest groups with guidance provided by the Consumer Financial Protection Bureau (CFPB) and the Food and Drug Administration (FDA, whose Nutrition Facts label adopted almost 30 years ago influenced the broadband label).<sup>15</sup> Indeed, the CAC, of which CR is currently a member, has already been called upon to participate in the implementation of the new label as part of this proceeding, and we expect that ISPs and consumer groups will cooperate once again in that effort.

Because we anticipate additional information may be added to the label, or as complementary to the label (e.g., our recommended archive of service plans and labels), the Commission should consider a very limited number of links to be included in the label to direct consumers to additional resources, some of which we will further discuss in the next section

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<sup>12</sup> A press release describing CR’s Fight for Fair Internet (formerly known as Let’s Broadband Together) can be found at <https://www.consumerreports.org/media-room/press-releases/2021/07/consumer-reports-launches-broadband-together---a-nation-wide-sea/>. Excerpts of monthly bills from a number of ISPs are displayed in Exhibits A and B. Exhibit A details bills that do not include download and upload speeds, or only download speeds. Exhibit B contains examples of bundled bills from two different ISPs where a price for the internet service portion is not displayed separately from the bundled price.

<sup>13</sup> See Exhibit A.

<sup>14</sup> See Exhibit B.

<sup>15</sup> NPRM at ¶ 23.

regarding the content of the label. Care must be taken not to burden the label’s current straightforward appearance with too much text or fine print that could lead to consumer confusion or indifference; but, the opportunity to offer more detail as relevant is available in a simple manner via clearly displayed links.

The NPRM also asks: “Should we allow ISPs any flexibility in displaying the label contents to reflect the variety of formats consumers use to learn about and subscribe to broadband services?”<sup>16</sup> The question is appropriate to consider because of the many ways consumers access information when making purchasing decisions, especially in the digital marketplace. And CR generally appreciates flexibility and a variety of approaches to achieve policy goals or ensure compliance with a statute.

However, we must not stray from the Congressional mandate of a label that looks the same whether the ISP is the nation’s largest or smallest provider, plan details notwithstanding. Mandating a uniform label that all ISPs must comply with is what the statute requires and should be implemented by the Commission. Standardization is essential for consumers to make comparisons and for information to be presented in a consistent way. Beyond that essential requirement, CR supports the creativity of ISPs to further explain the details of their service offerings to appeal to a wide range of audiences—but the required label must be prominently displayed next to advertised service offerings and on monthly bills all the same.

As a final matter, The NPRM also asks if the labels should be provided in a machine-readable format, and CR agrees that it should, especially since the Commission will be tasked with the annual collection of broadband pricing data as discussed in paragraph 25. CR’s own experience with analyzing current ISPs bill reveals the complexity and diversity of bills, making it difficult (in some cases, not at all) to ascertain something as simple as the total cost for internet service on any given bill. A machine-readable format of the broadband bill could significantly simplify this task, and allow the Commission, consumers, and third parties to analyze data to better compare service plans and their cost offered by multiple providers.

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<sup>16</sup> NPRM at ¶ 24.

## II. LABEL CONTENTS

### *Basic Requirements*

As a starting point, the Commission must retain all of the information contained in the broadband label as detailed in paragraph 16, for both fixed and mobile service providers.<sup>17</sup> Because the 2016 label was repealed by the *Restoring Internet Freedom Order*, consumers have not experienced it on any scale.<sup>18</sup> Therefore, we question how a party to this proceeding could claim the label's basic content will overwhelm consumers. If anything, because of the changes in the broadband marketplace, and because of consumers' increased reliance upon internet service since 2016, the Commission has a real opportunity to enhance the label's contents, and provide additional, complementary information to benefit consumers.

### *Additional Content Regarding Network Practices, Discounts, Bundled Packages, Introductory Versus Promotional Rates*

Changes within the label itself supported by CR are contemplated in paragraph 20 of the NPRM. Because of the repeal of the *Open Internet Order*, ISPs must disclose whether they engage in blocking, throttling, and paid prioritization. This disclosure should be included in the network management practices of the label, though definitions of those terms can be better explained in a linked resource we describe below. Similarly, a clear language explanation that multiple devices used on a network may impact performance could appear in the network management practices section, and explained further in a linked resource.

Discounts for paperless billing, automatic electronic payments, or other features (e.g., some, though not all, ISPs discount a consumer's bill where a consumer-owned modem is used versus rented) should ideally be listed in the pricing section as individual discounts that consumers can avail themselves of, with a corresponding monetary value provided. Though less ideal, if the displayed base price is contingent upon a consumer subscribing to one of these features, the label should make that explicit in clear, concise language.

Some bundled packages offered by ISPs do not list a separate line item for the internet service portion of the bundle.<sup>19</sup> The broadband label should be updated to clear up this confusion once and for all. It can do so by including either the corresponding broadband label for the internet service plan included in the bundle, or display a unique broadband label for the internet

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<sup>17</sup> NPRM at ¶ 16. The 2016 label lists seven requirements for fixed providers, eight for mobile providers, and network management practices for both.

<sup>18</sup> *Restoring Internet Freedom*, WC Docket No. 17-108, Declaratory Ruling, Report and Order, and Order, 33 FCC Rcd 311, ¶ 231.

<sup>19</sup> See Exhibit B.

service plan for that bundle, but it must include the price for internet service (and not the bundle), and focus only upon the features of that service akin to a label for an “internet-only” subscription. Tempting as it may be to add more information to the label for a bundled service plan that details video features (e.g., 4K vs. 1080p video quality) as the Commission suggests and that some consumers might find useful, this is outside the scope of the label that must squarely focus on internet service, and may detract from uniformity.<sup>20</sup>

The law’s requirements regarding introductory rates can be sufficiently addressed by the 2016 label’s approach to promotional pricing, with one minor alteration.<sup>21</sup> The 2016 label would require ISPs to list the non-promotional price (which presumably would be the higher rate once the discount has expired), and then identify the promotional discount separately. To satisfy the statute, the expiration date of the promotional discount must be added. Should the Commission adopt our proposal to require the label to be displayed on monthly bills, this expiration date would appear monthly to remind consumers that a price increase is on the horizon. Better yet, the label on the bill a month before the expiration of the promotional price could include clear language that the promotion will expire next month and what the new price will be. This disclosure will help consumers budget for the new price, or contact their ISP to negotiate a new promotional rate.

### ***Complementary Resources***

The NPRM poses several interesting questions related to how the label might be updated to better assist consumers shopping for broadband service which could also serve valuable consumer education goals, too.<sup>22</sup> Because we have already suggested links contained within the label to direct consumers to a searchable archive of service plans and matching labels, another linked resource could host a rich body of information to help consumers select a broadband provider, a broadband service plan, managing use of that plan, and when to switch providers or a service plan. For example, this resource might provide consumers with information about the ISPs available in their area, to inform them of choices they may have. Another useful tool to provide would help consumers determine how much bandwidth they require for their daily internet needs, so they can purchase the appropriate service plans and speed tiers.<sup>23</sup>

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<sup>20</sup> NPRM at ¶ 19.

<sup>21</sup> NPRM at ¶ 18. This NPRM cites the statute which mandates that the broadband label “shall 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,” which suggests the label at the point of sale would display the lower, discounted rate.

<sup>22</sup> NPRM at ¶ 15.

<sup>23</sup> Examples of such a resource include one entitled “How Much Internet Speed Do You Need?” developed by CR that can be found at: <https://www.consumerreports.org/internet/how-much-internet-speed-do-you-need-a1714131782/>, and the FCC’s existing resource located at: <https://www.fcc.gov/consumers/guides/household-broadband-guide>.



The resource we envision could improve digital literacy by providing consumers with educational resources that define the importance of download and upload speeds, latency, and other network performance features. Explaining network management practices related to net neutrality principles could also be made available. An easy-to-understand “frequently asked questions” regarding broadband service, pricing, and fees could also be included. Details and eligibility requirements for the Affordability Connectivity Program could also be highlighted.<sup>24</sup> Developing and updating the broadband label with complementary resources as suggested presents the Commission an exceptional opportunity to advance digital literacy, and should be seized upon in this rulemaking.

### III. HEARINGS AND CONSUMER INPUT

As part of this rulemaking, and also directed by the statute, public hearings will be held to gauge consumer attitudes and behavior (e.g., purchasing decisions) in the broadband marketplace.<sup>25</sup> In the spirit of that process, and in addition to participating in those hearings as requested, CR will encourage consumers to submit comments in the docket to share their experience shopping for broadband services and evaluating offerings, and their satisfaction with the information provided by ISPs at the point of sale and in monthly bills.

Finally, as a member of the CAC, Consumer Reports looks forward to further discussing and debating the many issues related to the implementation of the broadband label, with specific attention paid to what defines the point of sale which was only briefly touched upon in this comment, and how the label should handle “introductory rates” as spelled out by the statute. In both instances, CR will work to ensure that consumer voices and concerns from the public interest community are included as part of that process. Our goal is a broadband label that is easy-to-understand, widely-viewed, and enhanced by complementary resources that will improve digital literacy.

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Consumer advocates have, for more than a decade, been pushing for a standardized, easy-to-read broadband label with the simple goal of understanding and shopping for broadband service a more simple task. New America’s Open Technology Institute first proposed a version of a standardized broadband label in 2009, but the industry’s actual moves toward transparency

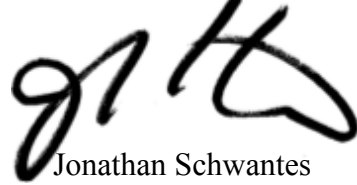
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<sup>24</sup> NPRM at ¶ 21. Including information about the FCC’s new Affordability Connectivity Program is contemplated in this paragraph.

<sup>25</sup> NPRM at ¶¶ 10, 13.

have been slow and faltering.<sup>26</sup> Unbelievably, as highlighted in this comment, some consumer bills do not even list the price paid for internet service. Adopting the label this year with enhancements to improve digital literacy, and requiring them to appear on monthly bills will fulfill the promise of transparency for prices and more in the broadband marketplace.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JS' followed by a stylized flourish.

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March 9, 2022

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<sup>26</sup> Emily Hong, Laura Moy, and Isabelle Styslinger, *Broadband Truth-In-Labeling: Empowering Consumer Choice Through Standardized Disclosure*, New America's Open Technology Institute, (July, 2015), <https://static.newamerica.org/attachments/4508-broadband-truth-in-labeling-2/Broadband%20Truth-in-Labeling%202015.c9ecf56cc29149488ad3263779be60b0.pdf>.

## EXHIBIT A

The following bill excerpts from a Spectrum (Charter Communications) bill does not list download and upload speeds, in either the summary or itemized portion of the statement.

<b>Summary</b> <small>Service from 11/04/20 through 12/03/20 details on following pages</small>	
Previous Balance	326.14
Payments Received -Thank You!	-326.14
<b>Remaining Balance</b>	<b>\$0.00</b>
Spectrum TV™	159.95
Spectrum Internet™	119.99
Spectrum Voice™	19.99
Other Charges	16.45
Taxes, Fees and Charges	9.76
Current Charges	\$326.14
<i>YOUR AUTO PAY WILL BE PROCESSED 11/21/20</i>	
<b>Total Due by Auto Pay</b>	<b>\$326.14</b>

<b>Charge Details</b>		
Previous Balance		326.14
Credit Card Payment	10/22	-326.14
<b>Remaining Balance</b>		<b>\$0.00</b>

Payments received after 11/04/20 will appear on your next bill.

Service from 11/04/20 through 12/03/20

<b>Spectrum TV™</b>		
Spectrum TV Gold		113.99
Cinemax		4.99
Spectrum Receivers	2 Receivers at 7.99 each	15.98
DVR Service		19.99
Spectrum TV Sports Pack		5.00
Recurring Payment		0.00
		<b>\$159.95</b>
<b>Spectrum TV™ Total</b>		<b>\$159.95</b>

<b>Spectrum Internet™</b>		
Spectrum Internet Gig		129.99
Bundle Discount with TV		-10.00
		<b>\$119.99</b>
<b>Spectrum Internet™ Total</b>		<b>\$119.99</b>

<b>Spectrum Voice™</b>		
<b>Phone number (858) 530-2217</b>		
Unlimited Long Distance		29.99
Pkg Includes: Phone Line, Modem, Up to 23 Calling Features, Calling Within U.S., Canada, Mexico, Puerto Rico, Guam & The Virgin Islands		
Bundle Discount		-10.00
		<b>\$19.99</b>

<b>Spectrum Voice™ Continued</b>	
For additional call details, please visit <a href="http://spectrum.net/account">spectrum.net/account</a>	
<b>Spectrum Voice™ Total</b>	<b>\$19.99</b>

<b>Other Charges</b>	
Broadcast TV Surcharge	16.45
<b>Other Charges Total</b>	<b>\$16.45</b>

<b>Taxes, Fees and Charges</b>	
Franchise Fee	9.68
Regulatory Cost Recovery Fee	0.08
<b>Taxes, Fees and Charges Total</b>	<b>\$9.76</b>
<b>Current Charges</b>	<b>\$326.14</b>
<b>Total Due by Auto Pay</b>	<b>\$326.14</b>

### Messages continued from page 1

**PLANNING A MOVE? We can help, and we're ready when you are.** Call to transfer your Spectrum services, and we'll have everything connected so you can feel right at home. Call to move your Spectrum services and we'll get you connected with no hassles. We'll ship self-install kits to enable you to connect on your own terms, with easy step-by-step instructions included. Call **1-855-689-4899** or visit [Spectrum.com/easymove](http://Spectrum.com/easymove)

**CUSTOMER EXCLUSIVE:** Spectrum Originals is a premier destination for premium original series, available exclusively to Spectrum TV subscribers on-demand and ad-free. Enjoy series like the second season of L.A.'s Finest, Curfew, Mad About You and more. Visit [SpectrumOriginals.com](http://SpectrumOriginals.com) to learn more.

The following bill excerpt from an Optimum (Altice USA) bill does not list download and upload speeds.



Account Number: [REDACTED]  
 Total Amount Due: **\$289.65**

Your Account Details		
<b>BALANCE LAST STATEMENT</b>		<b>\$ 309.33</b>
Your Single-Product Promotion Is Effective Until 11/30/2022		
<b>PARTIAL MONTH ACTIVITY</b>		
11/03 - 11/30	Internet Services	-18.67 cr
	Auto Pay Discount (Incl. Paperless Billing)	-4.67 cr
	Extra Discount	-60.67 cr
	<b>Total Partial Month Activity</b>	<b>-\$ 84.01 cr</b>
<b>INTERNET</b>		
12/01 - 12/31	Optimum Online (Incl. FREE unlimited access to Optimum WiFi)	89.99
	Optimum 400 Add-On	30.00
	Altice Gateway Network	10.00
	Enhancement Fee	3.50
	Smart Router	0.00
	<b>Total Internet</b>	<b>\$ 133.49</b>
<b>OTHER SERVICES</b>		
12/01 - 12/31	Extra Discount	-65.00 cr
	Auto Pay Discount (Incl. Paperless Billing) <i>Incl. \$5.00 Promotional Savings</i>	-5.00 cr
	<b>Total Other Services</b>	<b>-\$ 70.00 cr</b>
<b>TAXES &amp; FEES</b>		
12/01 - 12/31	Taxes and Other Fees	0.84
	<b>Total Taxes &amp; Fees</b>	<b>\$ 0.84</b>
	<b>Total Amount Due</b>	<b>\$ 289.65</b>

**Your Monthly Savings = \$70.00**

Look in the billing sections on this page to see your monthly savings highlighted in blue.

Plus you have access to lots of extra benefits at no additional cost. Learn more at [optimum.net](http://optimum.net).

The more you use Optimum WiFi the less you'll spend on cellular data.

**12.2** Avg. Customer WiFi Usage **\$195** Value\*

Gigabytes

**0** Gigabytes

**Your Optimum WiFi Network Usage Last 30 Days**

\*Value is calculated by multiplying the amount of WiFi usage (in gigabytes) by a \$15 per gigabyte fee for data overages from a Verizon Wireless cellular data plan.

**You could be getting more value from your Optimum Online service by using Optimum WiFi.**

Find out how to save more on your cellular data plan with WiFi at [optimum.net/wifiusage](http://optimum.net/wifiusage)

The following bill excerpts from a Cox Communications bill does not list download and upload speeds, in either the summary or itemized portion of the statement.

<b>ACCOUNT SUMMARY as of Nov 29, 2020</b>	
Previous Balance	\$107.77
Payment Received - Nov 19	-\$107.77
<b>Remaining Previous Balance</b>	<b>\$0.00</b>
<b>New Charges: Nov 30, 2020 - Dec 29, 2020</b>	
Internet	\$55.99
Telephone	\$29.99
Other Services	\$10.00
Taxes, Fees and Surcharges	\$11.79
<b>New Charges</b>	<b>\$107.77</b>
<b>Total Due By Dec 20, 2020</b>	<b>\$107.77</b>

<b>MONTHLY SERVICES Nov 30 - Dec 29</b>	
<b>INTERNET</b>	
<b>Cox High Speed Internet Essential</b>	
<i>Includes:</i>	
Essential Internet	
1.25 TB (1,280 GB) Monthly Data Plan.	
Over 3 million WiFi hotspots.	
Cox Security Suite Plus.	
	<b>\$55.99</b>
<b>Total Internet</b>	<b>\$55.99</b>
<b>TELEPHONE</b>	
949-496-8527	
<b>Cox Voice Premier</b>	
<i>Includes:</i>	
Basic Monthly Service	
Voice Mail	
Premier Feature Pak	
Cox Long Distance	
Unlimited Long Distance to Mexico	
Unlimited Long Distance	
	<b>\$29.99</b>
<b>Total Telephone</b>	<b>\$29.99</b>
<b>OTHER SERVICES</b>	
<b>Premium Support</b>	
Cox Complete Care	\$10.00
<b>Total Other Services</b>	<b>\$10.00</b>
<b>TOTAL MONTHLY SERVICES</b>	<b>\$95.98</b>

It is unclear in this Suddenlink bill if “Internet 75” suggests 75 Mbps is the download speed. The upload speed is not listed.

Account Summary		
Billing Period	Due Date	Amount
11/01/20 - 11/30/20	November 17, 2020	\$88.10
<b>Previous Balance &amp; Payments</b>		<b>\$0.00</b>
Balance Last Statement		\$88.10
Payment(s) Received By 10/26/2020		-\$88.10
<b>New Charges</b>		<b>\$88.10</b>
<b>Total Amount Due</b>		<b>\$88.10</b>






- You're enrolled in Paperless Billing.
- You're enrolled in Auto Pay.

Account Details				
<b>BALANCE LAST STATEMENT</b>				88.10
<b>PAYMENTS</b>				
10/17	Payment-Thank You			-88.10
	<b>Previous Balance</b>			<b>\$ 0.00</b>
<b>CURRENT MONTHLY CHARGES</b>				
		Retail	Savings	You Pay
<b>Internet</b>				
11/01 - 11/30	Internet 75			10.00
	Internet			89.99
<b>Other Services</b>				
11/01 - 11/30	Special Discount		-16.00	-16.00
<b>Total Current Monthly Charges</b>				<b>\$83.99</b>
<b>TAXES, FEES &amp; OTHER CHARGES</b>				
<b>Other Charges</b>				
11/01 - 11/30	Network Enhancement Fee			3.50
	State Cost Recovery Fee			0.61
<b>Total Taxes, Fees &amp; Other Charges</b>				<b>\$ 4.11</b>
<b>Total Amount Due</b>				<b>\$88.10</b>

**Ways to Pay**

Pay your bill, upgrade your services and manage your account at [suddenlink.net](http://suddenlink.net)

**Additional options:**

-  **Auto Pay**  
Manage at [suddenlink.com/ezpay](http://suddenlink.com/ezpay)
-  **Support App**  
Download at [suddenlink.com/apps](http://suddenlink.com/apps)
-  **In Person**  
Visit [suddenlink.com/stores](http://suddenlink.com/stores) for a location near you
-  **Phone**  
1.866.659.2861
-  **Mail**  
Detach the remit below and send it with your payment

Similarly, though 100 Mbps suggests that is the download speed in this Verizon bill, it is not clear and the upload speed is not listed.

### Details of Payments

Payments		
Previous Balance	71.46	
Payment Received - Thank You	-71.46	11/6
<b>Balance Forward</b>	<b>\$ 0.00</b>	

Payment activity since last bill date.

### Details of Charges

Services & Equipment		
<b>Services</b>		
Fios Home Internet: 100 Mbps	49.99	
Fios Home Phone	20.00	
<b>Subtotal</b>	<b>\$69.99</b>	11/13 - 12/12

Equipment and additional services to personalize your Fios service.


Taxes		
PA State and Local Sales Tax	1.47	
<b>Total Due</b>	<b>\$71.46</b>	

Thank you for being a loyal Verizon customer. Some charges shown include mandatory governmental fees, details can be found on page 4.

Though the “up to” download speed is listed in this Xfinity (Comcast) bill, the upload speed is not.

Regular monthly charges		\$74.99
<b>Your Xfinity package</b>		<b>\$74.99</b>
Internet: Performance Plus Internet	\$44.99	
Includes \$24.96 Service Discount		
Internet: Speed Increase Blast! Pro Internet	\$30.00	

**What's included?**

 **Internet:** Download as fast as 275 Mbps  
 Visit [xfinity.com/myaccount](http://xfinity.com/myaccount) for more details

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You've saved \$24.96 this month with your service discount.

Taxes, fees and other charges		\$0.40
<b>Other charges</b>		<b>\$0.40</b>
State Cost Recovery Charge	\$0.40	

The State Cost Recovery Charge is imposed by Comcast on its Texas subscribers to recover a portion of its expenses associated with charges imposed on Comcast by the State of Texas; Comcast is not required by law to collect this cost.

The following bill excerpt from an Frontier Communications bill does not list download and upload speeds.



<b>Frontier MONTHLY SERVICE CHARGES FROM 10/15/20 to 11/14/20</b>		
Frontier Internet with Voice		60.00
\$10.00 Discount through 01/07/21		
Internet Performance		
Freedom Essentials Voice		
Frontier Roadwork Recovery Fee		1.50
Enhanced Wifi Router		10.00
Carrier Cost Recovery Surcharge		3.99
<b>TOTAL MONTHLY SERVICE CHARGES</b>		<b>75.49</b>
<b>TAXES AND OTHER CHARGES</b>		
Federal Taxes and Charges*		10.06
State Taxes and Other Charges*		6.96
<b>TOTAL TAXES AND OTHER CHARGES</b>		<b>17.02</b>
<b>TOTAL</b>		<b>92.51</b>

Detail of Taxes and Other Charges on Pg.4 >




\*Includes Basic Charges

## EXHIBIT B

The following bundled service bills from Xfinity (Comcast) and Frontier Communications do not list an itemized price for the internet service portion of the bundle. Note that while the Xfinity bill lists the “up to” download speed, it is unclear if the “FiOS Internet 50/50” service listed on the Frontier bill indicates a synchronous download and upload speed of 50 Mbps.

Regular monthly charges		\$218.53
<b>Your Xfinity package</b>		<b>\$170.00</b>
<b>X1 Premier Pro</b>	<b>\$170.00</b>	
Triple Play Includes Digital Preferred, HBO MAX, Epix, Showtime, Hitz, TMC, DVR Service, HD Technology Fee, 1 Gig Internet, XFINITY Unlimited Select and More Sports & Entertainment Package		
Includes \$10.00 Service Discount		
<b>Equipment &amp; services</b>		<b>\$27.98</b>
TV Box & Remote	\$5.00	
Equipment Discount	-\$5.00	
Service to Additional TV with TV Adapter Qty 2 @ \$6.99 each	\$13.98	
Internet/Voice Equipment Rental	\$14.00	
<b>Service fees</b>		<b>\$20.55</b>
Broadcast TV Fee	\$12.55	
Regional Sports Fee	\$8.00	
<b>Taxes, fees and other charges</b>		<b>\$17.72</b>
<b>Other charges</b>		<b>\$9.29</b>
Federal Universal Service Fund	\$0.88	
Regulatory Cost Recovery	\$1.51	
Public, Educ & Govt Fee	\$1.11	
Franchise Fee	\$5.79	
<b>Taxes &amp; government fees</b>		<b>\$8.43</b>
911 Fees	\$0.30	
Sales Tax	\$1.88	
Local Utility User Tax	\$6.25	

**What's included?**

-  **TV:** 260+ Channels
-  **Internet:** Download as fast as 1000 Mbps
-  **Voice:** US & Int'l Calling  
For: (650)992-3751

Visit [xfinity.com/myaccount](http://xfinity.com/myaccount) for more details

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You've saved \$10.00 this month with your service discount.

**Peacock Premium (\$4.99 value)** is now included in your Xfinity package on us. Experience timeless movies, TV shows and exclusive originals that you can't not watch. Just say Peacock into your Voice Remote to start streaming or visit [xfinity.com/peacock](http://xfinity.com/peacock) to learn more.

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Term Agreement Applies 24 Month Term Agreement On Account. Visit [www.xfinity.com/myaccount](http://www.xfinity.com/myaccount) for Details.





**Frontier MONTHLY SERVICE CHARGES FROM 10/25/20 to 11/24/20**

Frontier Secure Personal Security Bundle	10.99
FiOS Double Play	144.99
Extreme TV	
FiOS Internet 50/50	
FiOS TV Quantum Enhanced Experience	10.00
FiOS Whole-Home HD DVR	15.00
FiOS Standard STB	10.98
Sports/Broadcast TV Fee	11.49
<b>TOTAL MONTHLY SERVICE CHARGES</b>	<b>203.45</b>

**OTHER SERVICE CHARGES AND CREDITS**

FTR Secure BB \$5 Credit	-5.00
<b>TOTAL OTHER SERVICE CHARGES AND CREDITS</b>	<b>-5.00</b>

**TAXES AND OTHER CHARGES**

Video*	7.90
State Taxes and Other Charges*	3.16
<b>TOTAL TAXES AND OTHER CHARGES</b>	<b>11.06</b>

**TOTAL** **209.51**

Detail of Taxes and Other Charges on Pg.4 >

Text

\*Includes Basic Charges