

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

In the Matter of)	
)	
All-In Pricing for Cable and Satellite)	MB Docket No. 23-203
Television Service)	
)	

**COMMENTS OF THE TEXAS COALITION OF CITIES FOR UTILITY ISSUES; CITY
OF BOSTON, MA; MT. HOOD CABLE REGULATORY COMMISSION; FAIRFAX
COUNTY, VA; AND THE NATIONAL ASSOCIATION OF TELECOMMUNICATIONS
OFFICERS AND ADVISORS**

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EXECUTIVE SUMMARY

The Texas Coalition of Cities For Utility Issues, City of Boston, Massachusetts, the Mt. Hood Cable Regulatory Commission, Fairfax County, Virginia and National Association of Telecommunications Officers and Advisors (“NATOA”) (collectively Local Government Commenters) call upon the Commission, consistent with the Congressional mandate and direction of President Biden¹ to adopt the mandatory all-in pricing disclosure rule as proposed in the Commission’s Notice of Proposed Rulemaking.² Local Government Commenters urge the Commission to require cable operators and DBS providers to clearly and prominently display the total cost of video programming service and separately itemize the elements that compose that aggregate cost.

This disclosure will establish pricing transparency and eliminate the practice of adding “junk fees”³ that are separate from the top-line service price so that consumers know exactly what they are paying for when they sign up for a cable subscription.⁴ The Commission should ensure cable subscribers are afforded serious protections, continuing and improving upon prior efforts to impose clear disclosures for broadband, telecommunications and mobile wireless customers. An “all-in” pricing format must allow consumers to make informed choices by letting them more easily comparison shop among competing services.

Studies and analysis by journalists demonstrate an ongoing problem with hidden fees that mislead consumers into selecting a higher price than they intended. NATOA compiled data to show increases over time and the benefits and limitations of existing local efforts to require forthcoming price disclosures. These data show:

- Cumulative increases in sports broadcasting and regional sports networks alone were between *68 and 74 percent* since 2020 in four major metropolitan areas;
- Broadcast fees increasing as much as five- to sevenfold since 2016, while cable prices have increased 25 to 50 percent;

¹ Statement from President Joe Biden on Proposed FCC All-in Pricing Rule, White House (June 20, 2023), <https://www.whitehouse.gov/briefing-room/statements-releases/2023/06/20/statement-from-president-joe-biden-on-proposed-fcc-all-in-pricing-rule> (*Biden Statement*).

² *All-In Pricing for Cable and Satellite Television Service*, Notice of Proposed Rulemaking, MB Docket No. 23-203 (rel. June 20, 2023) (*NPRM*).

³ President Biden describes “junk fees” as “these hidden charges that companies sneak into your bill to make you pay more and without you really knowing it initially.” *Remarks by President Biden on Protecting Consumers from Hidden Junk Fees*, White House (June 15, 2023), <https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/06/15/remarks-by-president-biden-on-protecting-consumers-from-hidden-junk-fees/>.

⁴ Local governments agree that satellite subscribers should also have this right, but as Local Franchise Authorities, we focus on cable regulation and pricing.

- Sharp increases in cable remote fees in the last two to three years; and
- Regional sports fees tripling, quadrupling or even quintupling in the last six years.

The Commission's most recent Communications Marketplace Report found, over the period 2013-2021, the compound average annual increase in broadcast fees per subscriber was 30.6%.⁵

Action is needed. Local Government Commenters recommend that the mandatory disclosure include:

- Service plan name
- Base monthly price for a stand-alone broadband service offering and any other monthly charges or one-time fees, with links to other listings of bundled rates;
- Whether a monthly rate is an introductory rate and the rate that applies following any introductory rate; and
- The length of any rate dependent upon a consumer's commitment to a particular contract term.

Local Government Commenters explain that the all-in price should include not only broadcast TV fees and regional sports fees, but also cable franchise fees, which are "street rent" for the use of the local rights-of-way and therefore are the cost of doing business just like other fees that should be included in the all-in price. Cable operators must be denied the façade of blaming increases on programming costs or the government.

Further, the mandatory disclosure should be required on any notice of a price change for existing subscribers. Such a notice should be given at least 30 days in advance of any price change to give consumers the opportunity to cancel their service and avoid the price increase.

⁵ *FCC Communications Marketplace Report*, GN Docket No. 22-203, Appendix E at 3 (rel. Dec. 30, 2022), <https://docs.fcc.gov/public/attachments/FCC-22-103A1.pdf>.

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OFFICERS AND ADVISORS**

I. INTRODUCTION

The Texas Coalition of Cities For Utility Issues;⁶ City of Boston, Massachusetts;⁷ Fairfax County, Virginia;⁸ the Mt. Hood Cable Regulatory Commission;⁹ and The National Association Of Telecommunications Officers and Advisors (NATOA)¹⁰, (collectively Local Government Commenters), file these Comments in response to the Notice of Proposed Rulemaking in the *All-In Pricing for Cable and Satellite Television Service* docket.¹¹ The Commission should require

⁶ The Texas Coalition of Cities For Utility Issues (“TCCFUI”) is a coalition of more than 50 Texas municipalities dedicated to protecting and supporting the interests of Texas cities and citizens with regard to utility issues. The Coalition is comprised of large municipalities and rural villages. TCCFUI monitors the activities of the United States Congress, the Texas Legislature, the Public Utility Commission of Texas, the Texas Railroad Commission, and the Federal Communications Commission on utility issues of importance to cities.

⁷ Dating back to 1630, Boston is the largest city in New England and capital of the Commonwealth of Massachusetts. Boston is home to approximately 690,000 people from all walks of life and is also home to numerous universities and robust technology and finance sectors. Each of these groups is particularly attuned to the critical importance of wireline and wireless broadband access and affordability to enable participation in the digital age. The City of Boston, through the offices of the Mayor, strives to ensure the City and all its residents, in single family homes and multiple dwelling units as well as visitors have competitive, affordable, and robust access to modern communications services. Too often though, the City hears firsthand from its residents that they are unaware of bill increases until after they notice them on their bills, especially as it pertains to cable and broadband services, causing frustration, especially financial frustration among lower-income populations. The City works to ensure that all of its residents are supported and advocated for in all aspects, especially regarding communications services.

⁸ Founded in 1742, the County of Fairfax, Virginia encompasses approximately 406 square miles and is home to 1.17 million residents. The County is governed by a ten-member Board of Supervisors and has served as the local franchising authority since 1980. Currently, there are three franchised cable operators in the County.

⁹ The Mt. Hood Cable Regulatory Commission negotiates and enforces cable service franchise agreements; manages the public benefit resources and assets derived from the franchises; and advocates on behalf of the public interest on communications policy issues at local, state and federal levels. The MHCRC serves the communities, residents and local governments of Fairview, Gresham, Portland, Troutdale and Wood Village and Multnomah County, Oregon (its member “Jurisdictions”).

¹⁰ NATOA’s membership includes local government officials and staff members from across the nation whose responsibility is to develop and administer communications policy and the provision of such services for the nation’s local governments.

¹¹ *All-In Pricing for Cable and Satellite Television Service*, Notice of Proposed Rulemaking, MB Docket No. 23-203 (rel. June 20, 2023) (*NPRM*).

cable operators and DBS providers to clearly and prominently display the total cost of video programming service and separately itemize the elements that compose that aggregate cost. This disclosure is important so that Consumers know exactly what they are paying for when they sign up for a cable subscription,¹² by establishing pricing transparency and eliminating the practice of adding “junk fees”¹³ that are separate from the top-line service price.

II. ADOPTION OF THE COMMISSION’S PROPOSAL WILL BENEFIT CONSUMERS AND COMPETITION.

Local Government Commenters support President Biden’s¹⁴ and the Commission’s proposal to require cable operators and DBS providers to clearly and prominently display the total cost of video programming service and separately itemize the elements that compose that aggregate cost.¹⁵ Local Government Commenters agree that the proposal will serve consumers and promote competition, by enabling consumers to know what they will pay when they subscribe to cable television services. It will enable them to shop among various services more effectively, enabling competition. As the Commission found when it adopted the broadband consumer label, “[c]onsumer access to clear, easy-to-understand, and accurate information is central to a well-

¹² Local governments agree that satellite subscribers should also have this right, but as Local Franchise Authorities, we focus on cable regulation and pricing.

¹³ President Biden describes “junk fees” as “these hidden charges that companies sneak into your bill to make you pay more and without you really knowing it initially.” *Remarks by President Biden on Protecting Consumers from Hidden Junk Fees*, White House (June 15, 2023), <https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/06/15/remarks-by-president-biden-on-protecting-consumers-from-hidden-junk-fees/>.

¹⁴ President Biden describes “junk fees” as “these hidden charges that companies sneak into your bill to make you pay more and without you really knowing it initially.” *Remarks by President Biden on Protecting Consumers from Hidden Junk Fees*, White House (June 15, 2023), <https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/06/15/remarks-by-president-biden-on-protecting-consumers-from-hidden-junk-fees/>.

¹⁵ *NPRM* at ¶¶6, 8.

functioning marketplace that encourages competition, innovation, low prices, and high-quality services.”¹⁶ In fact, studies demonstrate that price transparency generally leads to “lower and more uniform prices, a view consistent with predictions of standard economic theory.”¹⁷ “Drip pricing”—the practice of adding fees after an initial price is disclosed—can prevent consumers from identifying the cheapest offer.¹⁸ The Commission has a long history of taking action to ensure consumers have the information they need to understand their bills and avoid unexpected fees—from the recently-adopted broadband consumer label, to its Truth-in-Billing rules for telecommunications carriers¹⁹ and its efforts to prevent bill shock for consumers of mobile wireless services.²⁰

A. Consumer advocates and studies demonstrate the problem of hidden fees.

The problem of undisclosed fees in cable has been well-documented. For example, Consumer Reports conducted a study in 2019 showing that 24 percent of a consumer’s bill is attributable to fees “created by the cable industry,” such as “broadcast TV fees, regional sports fees, HD technology fees” and others. Consumer Reports estimated that “on average, the cable

¹⁶ *Empowering Broadband Consumers Through Transparency*, Report and Order and Further Notice of Proposed Rulemaking at ¶1, CG Docket No. 22-2, FCC 22-86 (rel. Nov. 22, 2022) (*Broadband Label Order*).

¹⁷ E.g., Congressional Research Service, *Does Price Transparency Improve Market Efficiency?* at 2-3 (2008), RL 34101, <https://crsreports.congress.gov/product/pdf/RL/RL34101>.

¹⁸ Shelle Santana, *et al.*, *Consumer Reactions to Drip Pricing*. *Marketing Science* 39(1):188-210 (2020), <https://doi.org/10.1287/mksc.2019.1207>; Alexander Rasch, *et al.*, *Drip pricing and its regulation: Experimental evidence*, *Journal of Economic Behavior & Organization*, 176:353-370 (2020), <https://www.sciencedirect.com/science/article/pii/S0167268120301189>.

¹⁹ 47 CFR § 64.2401.

²⁰ Federal Communications Commission, *Bill Shock: Wireless Usage Alerts for Consumers* (describing a settlement in which major U.S. mobile carriers committed to providing consumers with plans that incur additional charges for exceeding limits on voice, data, text usage or international usage), <https://www.fcc.gov/general/bill-shock-wireless-usage-alerts-consumers>.

industry generates close to \$450 per year per customer from company-imposed fees,” which means cable operators “could be making \$28 billion a year” from these fees.²¹ Journalists and consumer advocates have documented the practices of cable operators, demonstrating the likelihood that consumers will not be well-informed when they are choosing a video product. For example, TechHive documented the practices of Comcast, Charter and Cox in 2021, just after the Television Viewer Protection Act went into effect.²² The research found that all three providers did not disclose broadcast television fees, regional sports fees, TV connection fees, DVR and set-top box fees during the sign-up process, if at all.²³ Consumer Reports’ survey of 350 consumers documented many instances of consumers that were charged for equipment and routers (or discouraged from purchasing their own equipment) in a way that violates the Television Viewer Protection Act.²⁴ Companies have been accused of increasing hidden fees even after customers have agreed to a fixed-fee fixed-term contract.²⁵ Class action lawsuits or suits brought by state Attorneys General have resulted in settlements when companies impose fees that exceed its promise of a fixed price.²⁶

²¹ Jonathan Schwantes, Consumer Reports, *What the Fee? CR Cable Bill Report 2019* at ii (October 2019), https://advocacy.consumerreports.org/wp-content/uploads/2019/10/CR_WhatTheFeeReport_6F_sm-1.pdf.

²² Jared Newman, TechHive, *Cable-bill transparency laws haven’t killed sneaky fees*, (Jan. 28, 2021), <https://www.techhive.com/article/579177/cable-bill-transparency-laws-havent-killed-sneaky-fees.html>.

²³ *Id.*

²⁴ *Media Bureau Seeks Comment on Implementation of the Television Viewer Protection Act of 2019*, Reply Comments of Consumer Reports, MB Docket No. 21-501 (filed March 7, 2022).

²⁵ Harold Feld, *Junk Fees and Cable TV: Lessons from the Television Viewer Protection Act*, CPI Anti-Trust Chronicle at 5 (April 2023), https://www.pymnts.com/cpi_posts/junk-fees-and-cable-tv-lessons-from-the-television-viewer-protection-act/.

²⁶ *E.g., Grillo, et al. v. RCN Telecom Services, LLC et al.*, New Jersey Mercer County Superior Court, Case No. MER-L-1319-22, ; *In the Matter of Comcast Cable Communications, LLC*

Equity concerns arise with these undisclosed fees. For example, in other sectors, such as in banking, extra fees disproportionately impact low-income people or minority neighborhoods.²⁷ Regardless of whether vulnerable households are more likely to pay junk fees, the same level fee will account for a disproportionate share of a lower-income household's total funds than that of a higher-income household.

B. Local government data demonstrate the impact of increased hidden fees over time.

In response to the Commission's *NPRM*, NATOA has compiled fee data over time in four major metropolitan areas.²⁸ The results of that survey are attached in Appendix A. The survey demonstrates the increased consumer costs over time and the increasing contribution of cable operator-created fees toward a consumer's final bill.

The data compilation analysis demonstrates:

- Cumulative increases in sports broadcasting and regional sports networks alone were between *68 and 74 percent* since 2020 in four major metropolitan areas;

Superior Court, Suffolk County, Civil Action No. 18 – 3514 (Nov. 9, 2018); State of Minnesota v. Comcast Corporation, Minnesota Fourth Judicial District, Case No. 27-CV-18-20552.

²⁷ Consumer Financial Protection Bureau, *Credit card late fees* at 2 (March 2022), https://files.consumerfinance.gov/f/documents/cfpb_credit-card-late-fees_report_2022-03.pdf; Bankrate, *Minorities, Millennials Among Those Who Pay the Most Bank Fees*, (Jan. 15, 200), <https://www.bankrate.com/pdfs/pr/20200115-best-banks-survey.pdf>; National Consumer Law Center, *Auto Add-Ons Add Up* at 1, 29 (Oct. 2017), https://www.nclc.org/wp-content/uploads/2022/09/auto_add_on_rpt.pdf (Hispanic consumers pay more).

²⁸ The analysis was conducted by Garth Ashpaugh, CPA of Ashpaugh & Sculco. The analysis was prepared to assist clients and their outside counsel in evaluating the impact of Comcast changes in the Broadcast and Sports tier fees without changing the Limited and Expanded rates. Since bundle packages are based on Limited and Expanded rates as components of the bundles at the time of the bundle agreement with no changes in the bundles rates over the agreed term, this methodology allows significant increases in rates since these fees are in addition to and not included in the bundle rates.

- Broadcast fees increasing as much as five- to sevenfold since 2016, while cable prices have increased 25 to 50 percent;
- Sharp increases in cable remote fees in the last two to three years; and
- Regional sports fees tripling, quadrupling or even quintupling in the last six years.

In comparison, the Commission’s most recent Communications Marketplace Report found that, over the twelve months ending January 1, 2022:

- The monthly price for cable subscribers who take only basic service grew by 7.0%, to \$42.63; over the previous five years basic prices rose by an average of 11.2%;
- Prices for expanded basic service increased by 5.2%, to \$101.54; over the previous five years expanded basic prices rose by an average annual increase of 6.2%;
- Price per channel for basic and expanded basic service grew by 5.3% and 9.2% to \$1.09 and 90 cents per channel, respectively.²⁹

The Commission also reported that, from 2020 to 2021, total retransmission consent fees paid by cable systems to television broadcast stations increased, on average, by 14.4% but annual fees paid per subscriber increased, on average, by 20.3%, rising from \$168.83 to \$203.03 over the same period. Over the period 2013– 2021, *the compound average annual increase in broadcast fees per subscriber was 30.6%*.³⁰ In contrast, the general rate of inflation measured by the CPI rose by 7.5% over the twelve months ending January 1, 2022, and at an average annual rate of 2.6% over the last five years.³¹

²⁹ *FCC Communications Marketplace Report*, GN Docket No. 22-203 at ¶292 and Appendix E (rel. Dec. 30, 2022), <https://docs.fcc.gov/public/attachments/FCC-22-103A1.pdf> (*FCC Communications Marketplace Report*).

³⁰ *Id.*, Appendix E at 3.

³¹ *Id.*

C. Despite federal deregulation, local governments retain consumer protection authority.

As local franchising authorities (“LFAs”), local governments are co-regulators, with the Federal Communications Commission, of cable operators, part of the carefully structured dualism embodied in the Cable Act. As regulators, localities see up close the challenging business practices of many in the industry. LFAs also receive complaints and conduct reviews of the industry on the local level.

At one time, LFAs retained the ability to regulate cable prices, but under the Cable Act and Commission rules, rates cannot be regulated if they are subject to effective competition.³² Commission decisions defining effective competition have virtually eliminated local rate regulation.³³ In fact, the Commission reported, as of January 1, 2022, the Media Bureau had certified only one cable community in the United States as not subject to effective competition.³⁴ However, local governments retain authority to adopt customer service requirements as part of their cable franchise authority, 47 U.S.C. § 552(a), and retain their police power to regulate consumer protection, 47 U.S.C. § 552(d).

³² 47 U.S.C. § 543(a)(2); 47 CFR § 76.905(a).

³³ In 2015, based on the availability of DBS services, the Commission adopted a rebuttable presumption that cable operators are subject to “competing provider effective competition,” unless a showing is made to the contrary. *Amendment to the Commission’s Rules Concerning Effective Competition, Implementation of Section 111 of the STELA Reauthorization Act*, Report and Order, MB Docket No. 15-53, 30 FCC Rcd. 6574 (2015). In 2019, the Commission found, for the first time, that a cable operator was subject to effective competition from a local exchange carrier (LEC)-affiliated online video distributor (OVD). *Petition for Determination of Effective Competition in 32 Massachusetts Communities and Kauai, HI (HI0011)*, Memorandum Opinion and Order, MB Docket No. 18-283, 34 FCC Rcd. 10229 (2019).

³⁴ *FCC Communications Marketplace Report*, Appendix E at 4.

The Commission seeks comment on the routine practices of LFAs.³⁵ Local governments that adopt consumer protection rules typically adopt, at a minimum, requirements mandating that cable operators provide advance notice, typically 30 days, to consumers for any price change, or a publicly available rate card or schedule outlining current prices.³⁶ Further, local franchises often require refunds, prompt credits for service outages, local consumer offices, customer service standards for cable operator personnel, billing practices disclosures, call center hours, response times to repair calls, and procedures for unresolved complaints, and collect data regarding cable operator responses to customers.³⁷

Several samples of notifications to Local Government Commenters are included in Appendix B. The advanced disclosures of new or increasing cable prices can assist the public and journalists covering price increases.³⁸ On the other hand, the lack of uniformity across notifications from various companies and even from the same company over time can make it difficult for regulators, consumers or journalists to track changes over time.

³⁵ *NPRM* at ¶ 5.

³⁶ *See, e.g.*, Boston/Comcast Cable Television Agreement (May 15, 2021), Sections 7.4, 7.5, 12 <https://www.boston.gov/sites/default/files/file/2022/03/Comcastlicensesanssides20211005.pdf>; Fairfax County Code, Chapter 9.2, § 9.2-9-9(b) through (d), <https://www.fairfaxcounty.gov/cableconsumer/sites/cableconsumer/files/assets/documents/pdf/cprd/fairfax-county-code-chapter-9.2.pdf>.

³⁷ *Id.*

³⁸ *See, e.g.*, Jon Brodtkin, Ars Technica, *Comcast's sneaky Broadcast TV fee hits \$27, making a mockery of advertised rates*, (Nov. 28, 2022), <https://arstechnica.com/tech-policy/2022/11/comcasts-sneaky-broadcast-tv-fee-hits-27-making-a-mockery-of-advertised-rates/>.

III. THE COMMISSION SHOULD ADOPT CLEAR, ALL-IN PRICING FOR ALL COSTS OF DOING BUSINESS.

Local Government Commenters believe that a robust disclosure requirement that works alongside local consumer protection regulation will be a welcome addition to the cable sector and improve prices and competition for consumers. Specifically, Local Government Commenters recommend the Commission adopt a robust “all-in” price disclosure requirement that includes the full amount for video programming service the cable operator or satellite provider charges (or intends to charge) the customer – the total amount the customer must pay to obtain the service – and permits cable and DBS operators to separately itemize the elements that compose that aggregate cost: all components including broadcast retransmission consent, regional sports programming, and other programming-related fees and cable franchise fees.

Cable franchise fees are provided to local governments as “street rent” for the use of the rights-of-way. These are costs of doing business just as are the costs of acquiring broadcast programming and infrastructure to serve their consumers. Local Government Commenters believe—as recommended by Next Century Cities and Consumer Reports in the broadband consumer label docket³⁹—that taxes could be included in cable operator disclosures; but even if the Commission does not require the inclusion of taxes, franchise fees are not taxes.

The broadband consumer label also offers helpful guidance for the Commission in adopting a consistent and clear obligation for cable services and DBS. For example, the broadband consumer label requires the following:

- Service plan name

³⁹ *Empowering Broadband Consumers Through Transparency*, Reply Comments of Next Century Cities and Consumer Reports, CG Docket No. 22-2, at 3 (filed March 16, 2023).

- Base monthly price for a stand-alone broadband service offering and any other monthly charges or one-time fees, with links to other listings of bundled rates;
- Whether a monthly rate is an introductory rate and the rate that applies following any introductory rate; and
- The length of any rate dependent upon a consumer's commitment to a particular contract term.⁴⁰

The mandated cable operator and DBS all-in disclosure should similarly include these factors. In particular, cable video programming is often offered via an introductory rate that increases over time, or a particular bundle is offered only when the consumer commits to a service contract of a particular length. The Commission should clarify that the provider may not violate these disclosure terms. In some cases, providers have claimed that some fees can be changed regardless of a fixed price guarantee.

Local governments often require advance notice of changes to existing subscribers. This is an important consumer protection because existing subscribers can re-evaluate whether they wish to continue with a service at a new, higher price. Local Government Commenters recommend that the all-in price disclosure mandate apply not only when a consumer initially subscribes, but also on any notice that a price will change for existing subscribers. Such a notice should be given at least 30 days in advance of any price change to give consumers the opportunity to cancel their service and avoid the price increase.

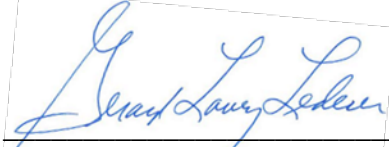
IV. CONCLUSION

Local Government Commenters congratulate the Commission for proposing this important consumer protection that will allow consumers to make fully-informed decisions and promote

⁴⁰ *Broadband Label Order* at ¶¶22-36.

competition. We stand ready to work with the Commission to develop the most effective proposal to this end.

Respectfully submitted,

A handwritten signature in blue ink, reading "Gerard Lavery Lederer", is enclosed in a thin black rectangular border. The signature is written in a cursive style.

Gerard Lavery Lederer
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July 31, 2023

APPENDIX A

ANALYSIS OF RATE CHANGES

COMCAST MONTHLY RATES																								
Year	Baltimore County, MD						Metropolitan Area Communications Commission, OR [A]						Seattle, WA						Boston, MA					
	Limited Basic	Broadcast Fee	Expanded Basic	Regional Sports Fee	Converter (TV Box) + Remote	Total	Limited Basic	Broadcast Fee	Expanded Basic	Regional Sports Fee	Converter (TV Box) + Remote	Total	Limited Basic	Broadcast Fee	Expanded Basic	Regional Sports Fee	Converter (TV Box) + Remote	Total	Limited Basic	Broadcast Fee	Expanded Basic	Regional Sports Fee	Converter (TV Box) + Remote	Total
2016	\$17.95	\$3.75	\$47.00	\$3.00	\$2.68	\$74.38	\$23.69	\$3.75	\$44.65	\$2.00	\$2.65	\$76.74	\$16.40	\$5.00	\$39.95	\$3.00	\$2.65	\$67.00	\$16.00	\$5.00	\$53.95	\$3.00	\$1.00	\$78.95
2017	\$17.95	\$5.50	\$45.00	\$5.00	\$2.68	\$76.13	\$24.49	\$6.50	\$43.85	\$4.50	\$2.65	\$81.99	\$16.40	\$7.00	\$39.95	\$5.00	\$2.65	\$71.00	\$17.00	\$7.00	\$52.95	\$5.00	\$1.00	\$82.95
2018	\$18.95	\$6.00	\$43.00	\$6.75	\$2.68	\$77.38	\$26.75	\$8.00	\$41.59	\$6.50	\$2.65	\$85.49	\$16.80	\$7.00	\$39.95	\$5.00	\$2.65	\$71.40	\$18.00	\$8.00	\$51.95	\$6.75	\$2.50	\$87.20
2019	\$20.95	\$6.75	\$46.32	\$8.25	\$2.68	\$84.95	\$28.75	\$10.00	\$39.59	\$6.65	\$2.65	\$87.64	\$17.25	\$10.00	\$39.95	\$6.50	\$2.65	\$76.35	\$19.00	\$9.75	\$48.27	\$8.25	\$2.50	\$87.77
2020	\$20.95	\$11.60	\$46.32	\$8.75	\$5.00	\$92.62	\$28.75	\$14.95	\$37.24	\$7.00	\$5.00	\$92.94	\$17.25	\$14.95	\$39.95	\$6.90	\$5.00	\$84.05	\$19.00	\$14.10	\$48.27	\$8.75	\$4.60	\$94.72
2021	\$20.95	\$16.10	\$46.32	\$10.75	\$7.50	\$101.62	\$28.75	\$19.45	\$37.24	\$7.50	\$5.00	\$97.94	\$17.25	\$19.45	\$39.95	\$7.55	\$5.00	\$89.20	\$19.00	\$18.60	\$48.27	\$10.75	\$4.60	\$101.22
2022	\$20.95	\$17.00	\$46.32	\$11.85	\$8.50	\$104.62	\$28.75	\$22.65	\$32.93	\$7.75	\$7.50	\$99.58	\$17.25	\$22.00	\$70.00	\$10.00	\$7.50	\$126.75	\$20.00	\$22.25	\$47.27	\$14.10	\$8.50	\$112.12
2023	\$20.95	\$21.70	\$40.73	\$12.35	\$10.00	\$105.73	\$28.75	\$28.95	\$22.93	\$8.00	\$9.00	\$97.63	\$17.25	\$26.85	\$50.00	\$10.35	\$9.00	\$113.45	\$22.00	\$24.70	\$37.50	\$14.45	\$10.00	\$108.65

Year	Baltimore County, MD						Metropolitan Area Communications Commission, OR [A]						Seattle, WA						Boston, MA					
	Total Fee Cost [B]	% Increase in Total Cost	Cumulative Increase	Increase in Fees	Annual Cost of Fee Increase [C]	Annual Cumulative Increase in Dollars	Total Fee Cost [B]	% Increase in Total Cost	Cumulative Increase	Increase in Fees	Annual Cost of Fee Increase [C]	Annual Cumulative Increase in Dollars	Total Fee Cost [B]	% Increase in Total Cost	Cumulative Increase	Increase in Fees	Annual Cost of Fee Increase [C]	Annual Cumulative Increase in Dollars	Total Fee Cost [B]	% Increase in Total Cost	Cumulative Increase	Increase in Fees	Annual Cost of Fee Increase [C]	Annual Cumulative Increase in Dollars
2020	\$20.35						\$21.95						\$21.85						\$22.85					
2021	\$26.85	31.94%		\$6.50	\$78.00		\$26.95	22.78%		\$5.00	\$60.00		\$27.00	23.57%		\$5.15	\$61.80		\$29.35	28.45%		\$6.50	\$78.00	
2022	\$28.85	7.45%	41.77%	\$2.00	\$24.00	\$102.00	\$30.40	12.80%	38.50%	\$3.45	\$41.40	\$101.40	\$32.00	18.52%	46.45%	\$5.00	\$60.00	\$121.80	\$36.35	23.85%	59.08%	\$7.00	\$84.00	\$162.00
2023	\$34.05	18.02%	71.33%	\$5.20	\$62.40	\$164.40	\$36.95	21.55%	68.34%	\$6.55	\$78.60	\$180.00	\$37.20	16.25%	70.25%	\$5.20	\$62.40	\$184.20	\$39.15	7.70%	71.33%	\$2.80	\$33.60	\$195.60

[A] Multiple LFAs. Comcast rates of "West Suburban".

[B] Broadcast + Sport fees

[C] Increase in fees annualized

Limited Basic - Tier one level service, sometimes referred to as B1.

Expanded - Second tier of video services, sometime referred to as B2. Also may include digital service. Comcast dropped "Expanded" in 2022, 2023 and now has "Popular TV" which is a bundle of Limited Basic, Sports & News, Kids & Family, Entertainment, Streampix, HD Programming, and 20 hours DVR Service

01/2019 rate went \$6.30. 05/2019 rate increased to \$6.70

APPENDIX B



July 7, 2023

Re: Charter Communications – Upcoming Changes

Dear Municipal Official:

We value our customers and are committed to providing them with the latest products and technology, and we work hard to keep prices as low as possible. Despite our best efforts, rising costs including programming fees charged by TV networks have impacted our pricing. Customers are being notified via bill message regarding the following price changes that will take effect on or after August 9, 2023. Please note for customers who may be paying a promotional price, the retail price and autopay discount does not take effect until the end of the promotional period.

Services/Products	Change
Broadcast TV Surcharge	Will increase by \$1.00/month.
Broadcast TV Surcharge for Spectrum TV Choice and Spectrum TV Stream	Will increase by \$2.20/month.
Spectrum Sports Programming Fee (Legacy Time Warner Cable Plans Only)	Will increase by \$2.00/month.
Spectrum Lifestyle Plan, Silver, and Gold	Will increase by \$5.00/month.
Spectrum TV Choice 10 <ul style="list-style-type: none"> Impacted customers are eligible to call to add 5 additional channels to their lineup starting 7/12/2023; On or after 8/9/2023, customers can visit Spectrum.net/YourChoice to choose channels Customers currently paying \$34.99 per month will only increase \$5.00 to \$39.99 per month with a \$10.00 credit for 12 months Customers currently paying \$39.99 per month will only increase \$5.00 to \$44.99 per month with a \$5.00 credit for 12 months 	Depending on a customer's subscription, will increase by either \$10.00/month or \$15.00/month.
Spectrum TV Choice 15	Will increase by \$5.00/month.
Spectrum TV Stream	Will increase by \$5.00/month.
Spectrum Sports Pack	Will increase by \$2.00/month.
Spectrum Sports View	Will increase by \$1.00/month.
Spectrum Bundled Voice <ul style="list-style-type: none"> Only impacts customers that are not already at current \$19.99 rate 	Will increase by \$5.00/month.

We remain committed to providing excellent communications and entertainment services in your community. If you have any questions, please feel free to contact me at [REDACTED].

Wed 6/29/2022

Dear Municipal Official:

This is to notify you of an upcoming Fios® TV pricing change.

On or after October 1, 2022, the Fios TV Broadcast Fee will increase by \$5 per month. This increase helps cover a portion of the costs local TV stations charge Verizon for their programming and is subject to change.

Verizon is notifying subscribers of the above by bill message, a sample of which is attached.

We realize that our customers have other alternatives for entertainment and our goal is to offer the best choice and value in the industry. Verizon appreciates the opportunity to conduct business in your community. Should you or your staff have any questions, please contact me.

Kind regards,
[REDACTED]
Verizon Consumer Group

Sample bill message:

The Verizon logo, consisting of the word "verizon" in a bold, lowercase, sans-serif font, followed by a red checkmark symbol.

Fios® TV Broadcast Fee

Effective on or after 60 days from the date of this message, you will receive a \$5 increase in your monthly Fios TV Broadcast Fee. This increase helps cover a portion of the costs local TV stations charge Verizon for their programming and is subject to change.

Tue 8/2/2022

Dear Municipal Official:

This is to notify you of an upcoming Fios® TV pricing change.

On or after January 1, 2023, the Fios TV Broadcast Fee for business customers will increase to \$11.49. This increase helps cover a portion of the costs local TV stations charge Verizon for their programming and is subject to change.

Verizon is notifying subscribers of the above by bill message, a sample of which is attached.

We realize that our customers have other alternatives for entertainment and our goal is to offer the best choice and value in the industry. Verizon appreciates the opportunity to conduct business in your community. Should you or your staff have any questions, please contact me.

Kind regards,
[REDACTED]
Verizon Consumer Group

Sample bill message:

The Verizon logo, consisting of the word "verizon" in a bold, lowercase, sans-serif font, followed by a red checkmark symbol.

Fios® TV Broadcast Fee

Effective on or after 60 days from the date of this message, you will receive a Fios TV Broadcast Fee of \$11.49/month. If you currently have a Fios TV Broadcast Fee on your bill, it will increase to \$11.49/month. This helps cover a portion of the costs local TV stations charge Verizon for their programming and is subject to change.



November 15, 2022

[Redacted]
[Redacted]
Fairfax County
[Redacted]
Fairfax, VA 22035

RE: Important Information—Price Changes

[Redacted]

At Comcast, we are always committed to delivering the entertainment and services that matter most to our customers in Fairfax County, as well as exciting experiences they won't find anywhere else. We are also focused on making our network stronger in order to meet our customers' current needs and future demands. As we continue to invest in our network, products, and services, the cost of doing business rises. Rising programming costs, most notably for broadcast TV and sports, continue to be the biggest factors driving price increases. While we absorb some of these costs, these fee increases affect service pricing. As a result, starting December 20, 2022, prices for certain services and fees will be increasing, including the Broadcast TV Fee and the Regional Sports Network Fee.

Enclosed are the notices customers will receive within their bill starting November 20, 2022. We know you may have questions about these changes. If I can be of any further assistance, please contact me at (410) 960-1566.

Sincerely,

[Redacted Signature]

Enclosures: Customer Notices

Important information regarding your Xfinity services and pricing

Effective December 20, 2022

Xfinity TV	Current	New
Broadcast TV Fee	\$21.00	\$25.40
Regional Sports Fee	\$11.85	\$12.45
Choice TV Select	\$32.50	\$37.50
Choice TV Select - with TV Box	\$41.00	\$47.50
Service to Additional TV with TV Adapter	\$8.50	\$10.00
TV Box and Remote	\$8.50	\$10.00
HD TV Box and Remote Limited Basic	\$8.50	\$10.00

Pay-Per-View and On Demand Subscription Services	Current	New
Acorn TV On Demand	\$5.99	\$6.99

Installation	Current	New
In-Home Service Visit - After Initial Installation of Service	\$70.00	\$100.00

Xfinity Internet	Current	New
Modem Rental	\$14.00	\$15.00

**Important Information - Price Changes
December 20, 2022
Additional Information Continued**

SERVICES NO LONGER AVAILABLE FOR NEW SUBSCRIPTIONS	Current	New
DIGITAL PREMIER TIER	\$ 64.95	\$ 67.00
PERFORMANCE INTERNET & VOICE	\$ 109.90	\$ 111.95
DOUBLE PLAY BUNDLE WITH BLAST! INTERNET & VOICE	\$ 129.90	\$ 131.95
DIGITAL PREMIER PACKAGE WITH 5 PREMIUM CHANNELS	\$ 132.22	\$ 134.27
EXTRA XF DOUBLE PLAY	\$ 132.22	\$ 134.27
DIGITAL PREMIER WITH SPORTS AND 4 PREMIUM CHANNELS	\$ 134.17	\$ 136.22
DIGITAL PREMIER WITH SPORTS AND 5 PREMIUM CHANNELS	\$ 136.17	\$ 138.22