

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Assessment and Collection of Regulatory Fees For Fiscal Year 2017</b>	)	<b>MD Docket No. 17-134</b>
	)	
	)	
	)	

**COMMENTS OF  
ITTA – THE VOICE OF AMERICA’S BROADBAND PROVIDERS**

ITTA – The Voice of America’s Broadband Providers (ITTA) hereby submits these brief comments in response to the Commission’s Further Notice of Proposed Rulemaking in its fiscal year 2017 regulatory fees docket.<sup>1</sup> The *FNPRM* seeks comment on whether the Commission should keep the bulk rate calculation for determining the number of subscribers in a multiple dwelling unit (MDU), modify it, or eliminate it due to changes in today’s MVPD market.<sup>2</sup> It also requests commenters to address whether they use the bulk rate calculation or if they separately count each subscriber, even those living in MDUs.<sup>3</sup> ITTA urges the Commission to retain the bulk rate calculation, without modification.

Several of ITTA’s members, who are incumbent local exchange carriers that provide a variety of communications services, including multichannel video programming distribution, utilize the bulk rate calculation. ITTA believes that the bulk rate calculation continues to function reasonably well as a proxy for the number of subscribers in an MDU. Having now been in place for nearly a decade, it affords providers predictability. In addition, many of ITTA’s

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<sup>1</sup>*Assessment and Collection of Regulatory Fees for Fiscal Year 2017, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7057 (2017) (FNPRM).*

<sup>2</sup> *See id.* at 7076, para. 51.

<sup>3</sup> *See id.* at para. 50.

members do not currently have a mechanism to separately count each subscriber in an MDU, when service is provided to the MDU as a whole and not separately billed to individual units within the MDU.

Elimination of the bulk rate calculation, forcing MVPDs such as several of ITTA's members to implement mechanisms to count each subscriber within an MDU, would therefore impose unnecessary costs on such MVPDs, with no corresponding benefit given ITTA's belief that the bulk rate calculation continues to function well. At a minimum, the Commission should allow MVPDs the option of continuing to use the current bulk rate calculation.<sup>4</sup>

For the foregoing reasons, ITTA urges the Commission to keep the current bulk rate calculation, at least as an optional tool for MVPDs to utilize. Doing so will fulfill the aims of reasonably approximating MVPDs' subscribers for regulatory fee calculation purposes, while avoiding the imposition of unnecessary costs on MVPDs, such as ITTA's members who provide competing multichannel video programming distribution services to predominantly rural areas.

Respectfully submitted,

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<sup>4</sup> Moreover, should the Commission be inclined to modify the bulk rate calculation methodology, it should seek further comment on a concrete proposal to do so.