



NOTICE OF EX PARTE

May 9, 2019

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

RE: GN Docket No. 17-108; Modernizing the Form 477, WC Docket No. 11-10; Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992, MB Docket No. 05-311; WC Docket No. 16-106

Dear Ms. Dortch:

At the request of ALLvanza, Rosa Mendoza, President & CEO to ALLvanza, met on Tuesday, May 7, 2019 with Michael Scurato, Acting Legal Advisor for Media and Consumer Protection, with the office of Commissioner Starks. A variety of issues were discussed during the meeting, including cable franchise fees, mapping and reporting of broadband availability, net neutrality, privacy and legacy regulations for cable programmers.

ALLvanza explained the need for all Americans, and especially those from underserved communities, to have access to broadband and mentioned that it is essential that internet service providers are not discouraged from providing this essential service by having to cover excessive and duplicative fees and taxes on the services they provide. This type of unfair financial burden could slow the deployment of innovative services that can help close the digital divide. ALLvanza expressed that charging duplicative fees and taxes on broadband can hurt consumers and especially those who already struggle to be connected because the extra cost can be passed to them. ALLvanza encouraged the commission to explore capping the fees or at a minimum not increase fees more than the 5 percent cap to avoid hurting consumers.

ALLvanza expressed the need for accurate broadband mapping for informational purposes to ensure that federal subsidies, such as the FCC's Connect America Fund or the USDA ReConnect program, are targeted to the areas of greatest need. This type of actionable information is critical to closing the digital divide; without accurate data it is

possible that resources will be expended in areas that do not have the greatest need, thereby depriving those who depend on these vital services for connectivity.

ALLvanza mentioned the proposals that are aimed at improving this issue:

- NCTA- The Internet & Television Association's proposal
- USTelecom's proposal
- Microsoft's proposal

ALLvanza expressed that although none of the proposals are perfect, we are encouraged by NCTA's proposal because we feel it will be most effective in solving the mapping issue. Additionally, ALLvanza encouraged the FCC to seriously consider NCTA's proposal as we believe it would fix many of the issues with reporting and mapping in an effective and timely manner.

ALLvanza mentioned that we urge Congress to work together in a bipartisan way to reach a solution for the good of all Internet users living in the U.S. ALLvanza expressed that the solution should be bipartisan, newly developed, and not a reliance on outdated regulatory policy such as Title II.

ALLvanza mentioned that we advocate for comprehensive, understandable, straightforward personal and general data protections for all consumers that is applied fairly and evenly to all the players in the internet ecosystem. ALLvanza expressed that it believes that privacy and a clear understanding of one's rights and protections is a critical part of broadband integration and therefore advocates to ensure that privacy and online safety is developed in a way that protects all adopters.

ALLvanza shared information about the positive changes happening in the creative industries, such as the explosion of innovation, competition and opportunity and the encouraging strides in diversity in the film and TV industries. ALLvanza expressed concern with undue burdensome regulations that can hurt that progress in the creative industries. ALLvanza encouraged the commission to consider removing unnecessary burdensome legacy regulations for cable programmers and other traditional programmers and explained that those regulations can also provide an unfair advantage in the marketplace when some of the emerging players (like streaming services) are not beholden to the same rules and regulations. ALLvanza explained that a thriving creative industry is a vital part of an overall thriving economy and helps keep the U.S. at the forefront of the global economy and that it is crucial to not stunt this growth with unnecessary legacy regulations.

Respectfully submitted,



Rosa Mendoza, President & CEO, ALLvanza