

December 21, 2022

Erica H. McMahon  
Federal Communications Commission  
Consumer and Governmental Affairs Bureau  
45 L Street NE  
Washington, DC 20554

**Re: *Empowering Broadband Consumers Through Transparency*, CG Docket No. 22-2**

Dear Ms. McMahon:

We, the undersigned, respectfully request the Commission grant a 60-day extension of the deadlines to comment in the above-captioned proceeding. We strongly support the Commission's efforts thus far to create broadband consumer labels and welcome the Further Notice that was published on Dec. 16. However, we believe additional time is needed to adequately develop a record on these issues.

The current 30-day deadline for comments, on Jan. 17, falls squarely within a busy period for the broadband data community. The Commission has already set a Jan. 13 deadline for challenges to the broadband availability maps, and the Federal Trade Commission has a Jan. 9 deadline for comments on its "junk fees" proceeding, which includes questions that implicate the broadband consumer label. These proceedings, coupled with the winter holidays, leave insufficient time to submit substantive comments in the above-captioned proceeding by Jan. 17.

Some commenters may choose to forgo mapping challenges or FTC comments in order to prioritize label comments, but the Commission does not need to force such tradeoffs. A 60-day extension would enable people to participate in all relevant proceedings, which would benefit the Commission, comity with the FTC, and the public interest.

We are eager to see the broadband labels reach the public as soon as possible, but we believe it is more important to ensure that the label is well-executed and well-informed by public comment. The questions in the Further Notice speak to core concerns about the label, including language accessibility and how to properly display price and speed information. These issues, and many others in the notice, demand a comprehensive record that cannot be sufficiently developed in a rushed 30-day period over the holidays. An additional 60 days would provide reasonable accommodation for the many public interest advocates, civil rights organizations, researchers, data experts, and consumers whose voices should be heard in this proceeding. Thank you for your consideration.

Respectfully submitted,

Free Press  
Benton Institute for Broadband & Society

Center for Democracy & Technology  
Common Sense  
Consumer Reports  
Greenlining Institute  
INCOMPAS  
Massachusetts Law Reform Institute  
National Broadband Mapping Coalition  
National Consumer Law Center  
National Digital Inclusion Alliance  
New America's Open Technology Institute  
Next Century Cities  
NTEN  
OpenMedia  
Public Knowledge  
Scott Jordan, University of California, Irvine