



**Testimony of Lisa McCabe**  
**In Opposition to Massachusetts House Bill 2882**  
**CTIA**  
**Before the Massachusetts Joint Committee on Telecommunications, Utilities and Energy**  
**October 15, 2019**

Chairs, Vice Chairs, and members of the committee, on behalf of CTIA, the trade association for the wireless communications industry, I write in opposition to House Bill 2882, which establishes state-specific requirements for internet service providers (ISPs) regarding advertising and substantiating internet speeds for internet access plans.

This bill is extremely burdensome, unnecessary and redundant, as ISPs, including wireless ISPs, are already required to disclose information regarding internet speeds to the Federal Communications Commission (FCC). The FCC already requires ISPs to disclose information about broadband internet access services, including accurate information regarding the ISP's network management practices, performance characteristics, and commercial terms of its broadband internet access services.

The FCC's transparency rule, 47 CFR § 8.1(a), requires ISPs to disclose information about broadband Internet access services which include a substantive disclosure submission which contains performance characteristics such as a general description of the service, including the service technology, expected and actual access speed and latency, and the suitability of the service for real-time applications.<sup>1</sup> Bills such as this would create a patchwork of regulation across the country, the cost of which would be borne by all customers, including those in Massachusetts.

Regarding the advertising prohibitions in the bill, the commonwealth Attorney General as well as the Federal Trade Commission already have established oversight and enforcement authority over ISP consumer practices making additional state specific requirements regarding ISP advertising unnecessary.

CTIA and its members respectfully urge you not to move this bill.

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<sup>1</sup> <https://www.fcc.gov/consumer-governmental-affairs/internet-service-provider-disclosures/disclosure-instructions-isps>