

February 4, 2026

Senator Deb Fischer
448 Russell Senate Office Building
Washington, DC 20510

Representative Richard Hudson
2112 Rayburn House Office Building
Washington, DC 20515

Senator Ben Ray Luján
498 Russell Senate Office Building
Washington, DC 20510

Representative Doris Matsui
2311 Rayburn House Office Building
Washington, DC 20215

Dear Sen. Fischer, Sen. Luján, Rep. Hudson and Rep. Matsui:

On behalf of the members of the National Multifamily Housing Council (NMHC), the National Apartment Association (NAA), and the Real Estate Technology and Transformation Center (RETTTC), thank you for your bipartisan, bicameral leadership in examining reforms to the Universal Service Fund (USF) and its role in ensuring that all Americans have access to affordable, reliable connectivity.

NMHC, NAA and RETTC partner on behalf of America's rental housing providers and technology suppliers that are driving innovation and helping assist in addressing our long-term housing challenges. NMHC, NAA and RETTC provide a single voice for rental housing developers, owners and operators and the technology suppliers that are driving innovation and helping assist in addressing our long-term housing challenges. One-third of all Americans call a rental property home—where, increasingly, technology solutions are being leveraged to modernize property operations, improve housing affordability and enhance the resident experience.

Connectivity is foundational to that mission. Broadband is no longer a luxury for renters—it is essential infrastructure for education, employment, healthcare, civic engagement, and daily life. NMHC, NAA and RETTC members play a direct role in supporting broadband deployment, access, and affordability across rental housing communities nationwide. In particular, bulk billing and managed Wi-Fi solutions have emerged as powerful tools for breaking down long-standing barriers to broadband adoption and affordability in multifamily housing. These models enable scalable deployment, consistent and reliable service, and lower overall costs—benefits that flow directly to renters while also reducing friction for providers and communities.

Bulk billing and managed Wi-Fi arrangements also eliminate many of the practical barriers consumers often face when attempting to access broadband, including equipment rental fees, credit checks, security deposits, and complex sign-up processes. Costs for service are typically incorporated into rent or charged as a transparent technology or amenity fee that is disclosed throughout the leasing process. As a result, these models have been particularly effective in expanding broadband access in affordable, senior, student, and workforce housing, where ease of access and predictable, pro-consumer pricing are critical.

In addition to improving affordability and access, bulk and managed Wi-Fi solutions support the deployment of smart technologies that residents increasingly expect in modern housing, as well as systems that improve building resilience, energy efficiency, and sustainability.

Despite this progress, a meaningful segment of renters in communities of all types still require targeted support to overcome affordability barriers to broadband adoption. For this reason, RETTC has long supported federal broadband affordability initiatives such as the COVID-era Emergency Broadband Benefit (EBB) and the Affordable Connectivity Program (ACP), both of which successfully

connected millions of low-income Americans—many of them renters—to essential broadband services.

As Congress considers reforms to modernize the USF and reestablish sustainable connectivity support, it is critical that policymakers recognize bulk billing and managed Wi-Fi as key affordability tools and ensure they remain fully compatible with any new or restructured assistance programs. Too often, renters living in communities served by these models are unintentionally excluded from affordability benefits due to eligibility rules or administrative structures that fail to reflect how broadband is delivered in modern rental housing.

The ACP experience underscores this challenge. In many cases, renters and property managers in bulk-billed or managed Wi-Fi communities faced obstacles accessing the benefit—even where support could have directly reduced monthly rent or technology fees. A reformed USF framework should ensure that affordability assistance reaches renters equitably, regardless of whether connectivity is provided through individual retail subscriptions or community-wide solutions.

Bulk billing and managed Wi-Fi are not obstacles to affordability—they are enablers. When paired with modern, flexible federal affordability support, these models can further reduce renter costs, expand broadband adoption, and help bridge the digital divide across urban, suburban, and rural rental housing communities nationwide—while simultaneously supporting housing affordability.

NMHC, NAA and RETTC stand ready to serve as a resource to the Working Group as you continue this important work. We welcome the opportunity to share data, practical insights, and real-world experience from the rental housing sector to help inform durable, technology-neutral policies that expand broadband access and affordability for renters across the country.

Thank you for your leadership and continued commitment to connecting all Americans.

Sincerely,



Sharon Wilson Géno
President
National Multifamily Housing Council



Bob Pinnegar
President and Chief Executive Officer
National Apartment Association



Kevin Donnelly
Executive Director and Chief Advocacy Officer
Real Estate Technology & Transformation Center

CC: Members of the Universal Service Fund Working Group