

September 1, 2026

Chairman Richard Hudson
Subcommittee on Communications &
Technology House
Committee on Energy and Commerce
2112 Rayburn House Office Building,
Washington, DC 20515

Ranking Member Doris Matsui
Subcommittee on Communications and
Technology House
Committee on Energy and Commerce
2206 Rayburn House Office Building,
Washington, DC 20515

Dear Chairman Hudson and Ranking Member Matsui:

On behalf of the Real Estate Technology and Transformation Center (RETTCC), the National Multifamily Housing Council (NMHC) and the National Apartment Association (NAA), we write to thank you for convening the upcoming subcommittee markup. As you examine the AI for Secure Networks Act and the PLAN for Broadband Act, we wish to share insight into how rental housing providers are working to expand affordable broadband access for the more than 44 million Americans who call rental housing home.

NMHC, NAA and RETTCC provide a single voice for rental housing developers, owners and operators and the technology suppliers that are driving innovation and helping address our nation's long-term housing challenges. One-third of all Americans call a rental property home, where technology solutions are increasingly leveraged to modernize property operations, improve housing affordability and enhance the resident experience. Broadband is no longer a luxury for renters. It is essential infrastructure for education, employment, healthcare, civic engagement and daily life.

Bulk Billing and Managed Wi-Fi Are Proven Tools for Closing the Digital Divide

As the subcommittee examines the PLAN for Broadband Act, NMHC, NAA and RETTCC would like to raise concerns regarding the challenges rental housing communities face in delivering reliable, high-speed internet access, especially in older buildings, high-density urban areas, and historically underserved communities. Bulk billing and managed Wi-Fi arrangements have emerged as powerful tools for overcoming these barriers.

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

Bulk arrangements also drive infrastructure investment. The known rate of return guaranteed in a bulk contract justifies the substantial initial capital expenditure needed to build out a

modern broadband network. This is particularly true in existing affordable housing stock where low take rates and high turnover under a traditional retail subscriber model can make a project unprofitable for the internet service provider. This has fostered a competitive market that allows smaller, independent providers to participate and encourages larger providers to serve markets they might otherwise forgo.

Despite this progress, a meaningful segment of renters still requires targeted support to overcome affordability barriers to broadband adoption. Federal efforts have too often failed to reflect how broadband is delivered in modern rental housing. As the subcommittee examines the PLAN for Broadband Act and a national strategy to close the digital divide, we urge you to embrace a technology-neutral approach for broadband planning, mapping or affordability assistance. A reformed federal framework should ensure that support reaches renters equitably regardless of whether connectivity is provided through individual retail subscriptions or community-wide solutions.

AI Is Strengthening Network Security and Resilience in Rental Housing

As the subcommittee also examines the AI for Secure Networks Act, we encourage greater attention on multifamily communities, where millions of Americans actually connect. Rental housing communities are increasingly deploying smart home and IoT technologies ranging from access controls and locks to lighting, thermostats, and leak detection sensors. These systems depend on always-on, property-wide connectivity, and AI is helping housing providers and their technology partners secure and sustain them through:

- Real-time threat detection: isolating unusual behavior that could indicate network breaches or device vulnerabilities.
- Maintenance prediction: identifying network or equipment failures before they affect residents and minimizing downtime.
- Predictive network optimization: managing bandwidth to sustain performance during high-traffic periods.
- Smart network design: modeling infrastructure needs to guide cost-effective deployment that avoids overbuilding while ensuring equitable access.

These capabilities depend on the coherent network architecture that bulk and managed Wi-Fi arrangements make possible. Fragmented service degrades performance, complicates security monitoring and impairs property operations that rely on modern connected systems.

Conclusion

As the subcommittee explores the future of AI policy and connectivity infrastructure, we urge you to:

- Recognize bulk billing and managed Wi-Fi as key affordability tools and ensure they remain fully compatible with any new or restructured broadband assistance, planning, or mapping framework.

- Preserve the existing partnership model that enables rental housing operators and communications providers to enter into agreements negotiated under free market conditions, encouraging competition, higher customer service standards and better, faster, more reliable service than is typically available in the broader retail market.
- Ensure that federal examination of AI and network security accounts for multifamily communities, including the IoT and smart building systems that operate on property-wide networks.
- Prevent duplicative and fragmented AI regulations at the state and local levels, which risks stifling innovation and increasing compliance costs in ways that undermine the benefits these technologies offer renters and housing providers alike.
- Engage with housing providers when shaping AI, network security and broadband infrastructure policy, ensuring solutions account for the challenges, and opportunities across the rental housing landscape.

NMHC, NAA and RETTCC stand ready to serve as a resource to the subcommittee as it continues 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 again for your leadership in exploring how secure, modern connectivity infrastructure can support a more connected future across rental housing.

Sincerely,



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National Multifamily Housing Council



Bob Pinnegar
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