

FMTC & BNN Broadband Labels Policy

Why is FMTC & BNN providing Broadband Nutrition Labels?

Transparency is built into our products and pricing and backed up by our core values of honesty and integrity. We're all used to reading nutrition labels on food and beverages. The Federal Communications Commission (FCC) now requires all internet providers to display their product information in a similar, standardized, and easy-to-read format.

Why is the FMTC & BNN Broadband Nutrition Label important?

With the 2024 FCC requirement of broadband nutrition labels, all internet providers are required to be more transparent with their fees, promotional prices, typical upload and download speeds, and latency. As a result, you can easily compare across internet providers and choose the best plan for you. As you can tell from our labels, Triangle does not engage in introductory pricing.

What plans are labels created for?

Labels are created for standalone residential and business internet plans currently offered to new customers. Triangle's standard 'off-the-shelf' internet access services.

Where & how are labels displayed and distributed?

Website — Broadband labels are displayed at the point of sale upon entering the address in our SmartHub online system for standalone internet plans, where a member can sign up online. Broadband labels may also be displayed on the online sign-up forms for internet only plans.

Office —

- A QR code will be available in the office for customers to view standalone internet plans. **OR**
- If the member does not have a device to view the QR code, hand the member the iPad with the link pulled up to view the labels. **OR**
- Public WiFi is available to members to utilize to view the labels. In the event of an internet outage, a paper copy of the label will be provided. **OR**
- If the member does not have access to internet, a printed copy of the label can be provided. **OR**
- The URL for the Machine Readable Label can be displayed on the iPad as well. **OR**
- If member has access to internet, member can be emailed the QR code.

Phone Calls —

- Customers are directed to the online sign up page to view the packages and labels as the rep is discussing the options. **OR**
- If the member has access to the internet, the member can be emailed the QR code. **OR**
- If the member has access to the internet, the member can be given the Machine Readable URL to view the label information. **OR**
- If the member does not have access to the internet, a copy of the label can be mailed. **OR**
- The label can be read over the phone in its entirety to the member.

Online Account Portal - Customers are emailed a registration email for SmartHub online account access to view their current standalone internet broadband label. The labels are located under My Services section.

Machine Readable — Standalone internet plans will have a machine-readable label available on our website via a URL and in the office via a QR code. [\(add to our network management policy disclosure as a link at the bottom with the transparency disclosures\)](#)

What options are available for ADA requests for a label?

- Increase font size on the label
- Verbally reading the label
- Additional member requests will be reviewed to determine if possible.

How long will FMTC & BNN keep Broadband Labels?

FMTC & BNN will maintain an archive of all labels for a period of no less than two years from the time the service plan reflected on the label that is no longer available for purchase by a new subscriber, and FMTC & BNN has removed the label from our website and alternate sales channels (e.g., office location and over the phone).

Will FMTC & BNN create labels for Grandfathered plans?

The FCC requires that ISPs display labels for plans currently offered to new customers. ISPs are not required to create and display labels for services used by current customers that are no longer available to new customers.

Will FMTC & BNN notify members when a term changes on the label?

FMTC & BNN will follow its normal customer notification process to inform customers about a change in their service or pricing.

Unique Plan Identifier – Actual UPI doesn't include "-". F-0003729316-845B-10M-01M-TRIAN –

F = Fixed Broadband

TTC's FRN – 003729316

Billing Code – 845B

Download Speed – 10M

Upload Speed – 01M

Triangle – Fill in as much of Triangle as you can till you hit 26 characters.

History

Where did the broadband labels come from?

The 2021 Infrastructure Investment and Jobs Act (Infrastructure Act), among other things, directs the FCC to require broadband Internet access service providers (ISPs or providers) to display, in the form of labels, certain information regarding their broadband Internet access service plans. The law further

provides that labels shall make clear whether the offered price is an introductory rate and, if so, what the consumer must pay after the introductory period ends.

What is the intent of the broadband label?

Access to clear, easy-to-understand, and accurate information about broadband Internet access services helps consumers make informed choices and is central to a well-functioning marketplace that encourages competition, innovation, low prices, and high-quality service. A label associated with stand-alone broadband service will provide important information to consumers when selecting a provider and plan.

Broadband Label Requirements

Do the labels need to be machine-readable?

Providers are required to make the label content available in a machine-readable format on their websites. Providers should make each label's information available by providing the information separately in a spreadsheet file format such as .csv. These files should be made available on a provider's website via a dedicated URL that contains all of a provider's given labels. The FCC requires providers to publicize the URL with the label data in the transparency disclosures.

Do the labels need to meet ADA or foreign language requirements?

The label must be accessible to people with disabilities and non-English speakers. The FCC strongly encourages providers to comply with the well-established legal requirements included in the Americans with Disabilities Act and the Web Content Accessibility Guidelines.

The FCC requires providers to make labels available in any other language in which the ISP markets its services in the United States. For example, if the ISP's marketing materials on its website are available in Spanish, the Spanish version of the website must also display the associated broadband labels in Spanish.

Is a glossary of terms required?

The FCC requires that providers include a link to the FCC's website at the bottom of all broadband labels. The Consumer and Governmental Affairs Bureau (CGB) will post a web page with a glossary of terms used on the label. Companies do not need to maintain their own glossary of terms.

When are Broadband Labels Required

Are Broadband Nutrition Labels required for every internet service offering?

Broadband Nutrition Labels are required for any mass-market retail residential and business internet-only service offering to new customers. If the internet is part of a bundle, no label is currently required.

Are labels required for Enterprise Offerings or Special Access Services?

The FCC determined that “mass-market retail services” do not include enterprise service offerings or special access services, which are typically offered to larger organizations through customized or individually negotiated arrangements.

Are labels required for Grandfathered plans?

The FCC requires that ISPs display labels for plans currently offered to new customers. ISPs are not required to create and display labels for services used by current customers that are no longer available to new customers.

When do the labels need to be displayed?

The FCC’s rules require that ISPs display the label for each stand-alone broadband Internet access service they currently offer for purchase at the point of sale. This includes websites, alternate sales channels, and online account portals. Broadband labels do not need to be included on mass marketing channels or before customers specify their service location.

How is the point of sale defined?

ISPs must display the label at the “point of sale,” which is defined as at the time a consumer begins investigating and comparing broadband service offerings available at their location. AKA is the time at which the consumer views specific broadband plans available to them at their service location (often after the consumer enters address information on the provider’s website or conveys it to a sales representative).

What are the website’s point of sale rules?

The primary web page is considered the point of sale—where consumers begin to shop for and compare broadband service offerings available at their location. Providers must display the labels on their websites after the consumer enters any required service location information, but labels do not need to be included on mass marketing channels or prior to customers specifying their service location.

Once the consumer has entered location information, the label must appear on the provider’s primary advertising web page that identifies the plans available to the consumer. Providers must display the actual label—not simply an icon or a link to the label—in close proximity to the associated plan advertisement.

Providers are not required to use any particular font size for the label information. However, providers should ensure that the labels are prominently displayed on any device on which the consumer accesses and views the labels, including mobile devices.

Do labels need to be available in the online account portals?

ISPs that offer online account portals to their customers must make each customer’s label easily accessible to the customer in such portals. After purchasing broadband service for which the ISP provided a label, consumers should be able to easily access and review the terms of their existing plans to ensure they are receiving the services and price they agreed to at the time of purchase.

Do labels need to be printed on a customer’s bill?

The FCC has no requirement to print the label on the customer's bill.

Are labels required for E-RATE or RHC Plans?

The FCC defines "point of sale" for purposes of the E-Rate and RHC programs as the time when a service provider submits its bid to a program participant. Thus, the FCC requires E-Rate and RHC providers to provide a label along with any competitive bids submitted pursuant to the E-Rate or RHC Program competitive bidding process. In the limited instances in which a service provider provides services without submitting a bid and has not yet provided a label to the E-Rate or RHC applicant, the label must be provided with the first invoice it submits to the applicant.

This applies to mass-market broadband-only services offered in the E-Rate and RHC programs where program participants purchase a standard 'off-the-shelf' Internet access service. Customized or individually negotiated arrangements do not require a label and such services are not covered by the label disclosure requirements.

Are ISPs required to notify members when a term changes on the label?

ISPs do not need to notify customers directly about changes to the terms and conditions in the displayed labels.

Broadband Label Recordkeeping and Reporting Requirements

How long do I have to keep Broadband Labels?

ISPs must maintain an archive of all labels for a period of no less than two years from the time the service plan reflected in the label is no longer available for purchase by a new subscriber and the provider has removed the label from its website or alternate sales channels.

The provider must provide any archived label to the Commission, upon request, within 30 days. It must similarly provide any archived label to an existing customer whose service plan is associated with the particular label upon request and within 30 days. ISPs must archive evidence sufficient to support the accuracy of the labels' content, such as the data that supported the performance information that appeared on the label, along with any links to relevant network management practices and privacy policies.

What are the requirements for Documenting Customer Interaction?

Providers shall document each instance when it directs a consumer to a label at an alternate sales channel and retain such documentation for two years. As an alternative to documenting each consumer interaction, a provider may, instead: 1) establish the business practices and processes it will follow in distributing the label through alternative sales channels; 2) retain training materials and related business practice documentation for two years; and 3) provide such information to the Commission upon request, within 30 days. FMTC & BNN will use the Alternative to documenting each consumer interaction by following the 3 criteria.

What are the requirements of the Unique Plan Identifier?

The FCC requires ISPs to develop unique identifiers for each of their plans and attach them to the broadband label. The unique identifier should consist of a unique ID for fixed plan or mobile plan (“F” for fixed plans and “M” for mobile plans), followed by the broadband provider’s FCC Registration Number (Providers must use the FCC Registration Number that is used when submitting data to the Broadband Data Collection), and ending with a provider-chosen string of precisely 15 alphanumeric characters uniquely identifying the specific plan within the broadband provider’s offerings. The Unique Plan Identifier shall not include special characters such as &, *, and %. Additionally, reuse of identifiers must not occur; even if a given plan is no longer offered, its string should not be repurposed for a new or different plan. **References**

A copy of the *Broadband Label Order*, is available at: <https://www.fcc.gov/document/fcc-requires-broadband-providers-display-labels-help-consumers>

A copy of the Federal Register Summary of the *Broadband Label Order* is available at: <https://www.govinfo.gov/content/pkg/FR-2022-12-16/pdf/2022-26854.pdf>

A copy of the *Order on Reconsideration* is available at: <https://www.fcc.gov/document/fcc-declines-reconsider-broadband-consumer-label-rules>

A copy of the Federal Register Summary of the *Order on Reconsideration* is available at: <https://www.govinfo.gov/content/pkg/FR-2023-09-18/pdf/2023-20115.pdf>

A copy of the Federal Register Summary announcing compliance dates of rules in the *Order on Reconsideration* is available at <https://www.govinfo.gov/content/pkg/FR-2023-10-10/pdf/2023-21682.pdf>

A copy of the Public Notice announcing the compliance dates for the rules is available at: <https://docs.fcc.gov/public/attachments/DA-23-943A1.pdf>

A copy of the Public Notice updating compliance obligations for inclusion of the ACP on labels is available at: <https://docs.fcc.gov/public/attachments/DA-24-195A1.pdf>

Additional resources on the broadband label requirements are available at: <https://www.fcc.gov/broadbandlabels>

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SMALL ENTITY COMPLIANCE GUIDE

**Empowering Broadband Consumers Through Transparency
Broadband Consumer Labels**

FCC 22-86, Released November 17, 2022

FCC 23-68, Released August 29, 2023

CG Docket No. 22-2