STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL,
APPROVING IN PART, DISSENTING IN PART

Re: Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission’s Rules, Notice of Proposed Rulemaking

In the RAY BAUM’s Act Congress sought to modernize the fee structure for services performed by the Federal Communications Commission. It did so by deleting outdated statutory language in our existing fee framework and directing the agency to update its application fees to better reflect the current state of communications services. This rulemaking gets the updating process going by seeking comment on specific proposals to revamp the agency’s application fee structure.

I broadly support this effort. After all, this undertaking is compelled by statute. Moreover, it thoughtfully proposes streamlining our schedule of application fees, consolidating the eight separate categories of fees presently in our rules into five functional categories. In addition, it clearly states that its goals in doing so are to ensure any new fee structure is administrable, sustainable—and fair.

But in one respect this proposal is definitely not fair. Not even close. At a time when a public health emergency has crashed our economy, with unemployment at record-high levels, and with so many now compelled to go online for so much of modern life, the FCC proposes a dramatic increase in the cost of filing a formal consumer complaint. This is crazy. It shows a wild disregard for the financial insecurity of so many households. By proposing to more than double the cost of a filing—from $235 to $540—the agency is demonstrating contempt for consumers looking to us for assistance when they have disputes related to their communications bills, difficulties securing service, or problems with their providers. Worse, it is deterring them from seeking our help in the first place. This is shameful. In this respect, I dissent.