

UPDATE July 30, 2026

FCC Streamlines Broadband Consumer Label Requirements

Last week, the FCC adopted a [Report and Order](#) that relaxes several broadband label requirements first adopted in 2022. The changes, once effective, will eliminate or simplify several requirements, including fee itemization, machine-readable label files, and retention of discontinued labels. The revised rules will also provide greater flexibility in how providers make labels available to consumers at the point of sale and through customer account portals.

Key updates include:

- **Streamlined Phone Disclosures.** Currently, ISPs must use a prescribed script when selling broadband service by telephone. The FCC eliminated this requirement, giving ISPs the flexibility to “present label information in natural, conversation style” by orally summarizing certain required label information, including monthly costs, fees, speeds, typical latency, data allowance, and contract lengths.
- **Aggregated Passthrough Fees.** ISPs will no longer be required to itemize every location-specific “passthrough fee” (e.g., right-of-way charges, pole attachment fees). ISPs may instead disclose either the exact total amount applicable to a particular location or an “up to” monthly total that breaks out (i) governmental passthrough fees and (ii) non-governmental third-party passthrough fees.

Providers using the “up to” approach must identify the types of fees that may be included in each category and provide a link to a webpage describing those fee types.

- **Customer Account Portal Direct Link.** ISPs offering online account portals may now satisfy the “easily accessible” requirement with a hyperlink or icon directing customers to their current plan's label, rather than displaying the full label within the portal itself.
- **Point-of-Sale Display Hyperlink or Icon.** At the point of sale (websites, retail locations, and phone channels), ISPs may now use a clearly identified hyperlink or icon placed near the advertised plan instead of displaying the full label. The link or icon must connect directly to the specific plan's label – not a general landing page – and must be clearly identified as leading to label information.
- **Machine-Readable Data File Requirement Eliminated.** ISPs will no longer need to publish label content in a separate machine-readable file at a dedicated URL for third-party/bulk aggregation. However, ISPs must still ensure labels work seamlessly with assistive tools like screen readers.

- **Archive Retention Requirement Eliminated.** ISPs will no longer need to retain labels for two years after a plan is discontinued and removed from sale.
- **Template Changes.** The FCC's Order removes the broadband label template from its rules. Instead, current and past label templates will be maintained at fcc.gov/broadbandlabels. Going forward, the FCC's Consumer and Governmental Affairs Bureau will handle changes to the template.

The revisions to the FCC's rules are not yet in effect. ISPs should continue their current broadband label practices at this time but should also begin evaluating how to comply with the aggregate passthrough fee disclosure model and review phone sales training materials in anticipation of the conversational-disclosure standard.

If you have any questions about broadband label requirements or other ISP disclosure obligations, please contact Scott Friedman at (608) 469-3596 or sfriedman@cinnamonmueller.com.

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