

FCC Proposes Streamlining Broadband Label Disclosure Requirements

November 3, 2025

At its October 28 meeting, the Federal Communications Commission (FCC) opened a rulemaking to consider changes to the rules for broadband labels. The rules were adopted in 2022 in response to a congressional mandate and went into effect in 2024. The changes would eliminate or simplify many of the current requirements for the labels and require them to be available only at the point of sale, in person or online.

The proposed changes include:

- **Ordering by phone:** Eliminate a requirement for broadband providers to read the label information orally to people who order service by phone.
- **Aggregate pass-through charges:** Allow broadband providers to aggregate state and local charges that they choose to pass through to customers, rather than itemizing them as required today. The notice also proposes to permit providers to provide a maximum amount for pass-through charges rather than an exact amount.
- **Affordable Connectivity Program:** Eliminate the requirement to provide information concerning the program, since it has ended.
- **Broadband labels in customer portals:** Eliminate the requirement that broadband labels be available in customer portals, so that information has to be provided only at the point of sale.
- **Machine-readable labels:** End the requirement to provide broadband labels in machine-readable format.
- **Archived labels:** Eliminate the obligation to archive labels for two years after a service plan no longer is offered.

The notice also asks for comment on other issues and provides an opportunity to seek additional changes to the rules. In particular, it asks whether the FCC should continue to require labels to be produced in every language used by the provider to market its services. The FCC also asks for comment on the potential negative effects of its proposed changes.

Collectively, the proposed changes to the rules would simplify compliance for providers significantly, particularly by requiring labels to be made available only at the point of sale.

Comments and reply comments on the proposed rules will be due 30 and 60 days after notice of the proposal is published in the Federal Register.

Cooley professionals can assist in evaluating the potential impact of changes in these rules and compliance risks under the current rules, as well as in providing comments to the FCC on the proposals.

This content is provided for general informational purposes only, and your access or use of the content does not create an attorney-client relationship between you or your organization and Cooley LLP, Cooley (UK) LLP, or any other affiliated practice or entity (collectively referred to as "Cooley"). By accessing this content, you agree that the information provided does not constitute legal or other professional advice. This content is not a substitute for obtaining legal advice from a qualified attorney licensed in your jurisdiction, and you should not act or refrain from acting based on this content. This content may be changed without notice. It is not guaranteed to be complete, correct or up to date, and it may not reflect the most current legal developments. Prior results do not guarantee a similar outcome. Do not send any confidential information to Cooley, as we do not have any duty to keep any information you provide to us confidential. When advising companies, our attorney-client relationship is with the company, not with any individual. This content may have been generated with the assistance of artificial intelligence (AI) in accordance with our AI Principles, may be considered Attorney Advertising and is subject to our [legal notices](#).

Key Contacts

Tamar E. Finn Washington, DC	tfinn@cooley.com +1 202 728 7129
J.G. Harrington Washington, DC	jgharrington@cooley.com +1 202 776 2818
Ronald W. Del Sesto Washington, DC	rdelsesto@cooley.com +1 202 728 7128

This information is a general description of the law; it is not intended to provide specific legal advice nor is it intended to create an attorney-client relationship with Cooley LLP. Before taking any action on this information you should seek professional counsel.

Copyright © 2023 Cooley LLP, 3175 Hanover Street, Palo Alto, CA 94304; Cooley (UK) LLP, 22 Bishopsgate, London, UK EC2N 4BQ. Permission is granted to make and redistribute, without charge, copies of this entire document provided that such copies are complete and unaltered and identify Cooley LLP as the author. All other rights reserved.