



February 2, 2022

The Honorable Alan Davidson
Assistant Secretary of Commerce for Communications and Information and Administrator
National Telecommunications and Information Administration
Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: Request for Comment on Broadband Programs in Bipartisan Infrastructure Law, Docket No. NTIA-2021-0002

Dear Assistant Secretary Davidson:

The urgency for action to permanently eliminate the digital divide in every American community, regardless of zip code, is greater than ever before. Federal agencies like the National Telecommunications and Information Administration (NTIA) have a historic opportunity to make substantial progress toward that national mission through the implementation of programs recently authorized by Congress in the Infrastructure Investment and Jobs Act to expand access to an affordable, reliable broadband connection and digital skills.

When distributing broadband deployment funding, Connect Americans Now (CAN) encourages NTIA to distribute broadband deployment funding consistent with the Infrastructure Investment and Jobs Act which targets funding in a technology neutral manner at unserved and underserved areas as well as anchor institutions without limiting which broadband technologies are eligible for funding. As NTIA prepares to administer the \$42 billion broadband deployment program, CAN and the co-signed organizations below urge NTIA to allocate these resources consistent with the legislation. This carefully crafted technology neutral approach allows broadband providers the flexibility they need to connect the greatest number of people as quickly as possible by leveraging the technology that is best suited for a given area. It allows for rapid deployment of broadband network solutions and maximizes the reach of government dollars in building networks and connecting consumers.

We have seen various types of broadband deployments from wired and wireless technologies to now even satellites used to deliver broadband service to people living in regions with differing levels of infrastructure as well as differing topographies and population densities. The 2021 Fixed-Wireless and Hybrid ISP Industry [report](#) from the Wireless Internet Service Providers Association (WiSPA) found fixed-wireless deployments can connect subscribers for one-fifth or less the cost of deployments that rely on fiber alone. The study also found fixed-wireless networks take less time to deploy and more quickly recoup initial investments — supporting the conditions for long term economic viability and network maintenance in less populated areas. The study found the timeframe for return on investment for fixed-wireless deployments is less than one year compared to the minimum of two years and as much as six years for other technologies. In order to connect as many communities as quickly as possible, an all of the above approach, that does not favor one type of technology over another, is essential.

Furthermore, a technology neutral approach provides multiple benefits. By allowing broadband providers to determine what technologies best serve a given community, it allows them to decide how best to deploy networks cost effectively. Given the size of the fund, this will maximize the impact of each dollar by allowing cost effective technologies to serve the hardest to serve, unserved areas — helping ensure more resources are available to also reach underserved areas. A technology neutral approach will also allow for rapid deployment of networks and reduce the likelihood of over-building — thereby maximizing the impact of the funding and the number of Americans with access to broadband. Ultimately, with limited resources, it's critical to put a plan in place that reaches as many people as possible with broadband and reduces the likelihood that another generation may grow up without broadband in American communities.

We also commend NTIA's commitment to solutions that can more effectively help to close the broadband gap, particularly NTIA's recent establishment of a broadband map that allows the public to better understand the state of broadband in American communities



by comparing data from a variety of sources. According to the Federal Communications Commission (FCC) — more than [14 million](#) people living in America lack broadband access. However, a recent study found the actual number of individuals lacking access to affordable, reliable broadband in the U.S. is closer to [42 million](#), and a separate analysis of usage data suggests that as many as [120 million](#) people are not using the internet at broadband speeds. The use of multiple data sets to better understand where broadband is available is a critical tool in getting to accurate maps and ultimately ensuring that funding is prioritized for areas that will have the greatest impact on connecting consumers. NTIA should continue to make its maps available using third-party data which in the near term can help to inform potential applicants as they prepare to pursue funding and assist the FCC in the development of accurate broadband maps.

CAN and the co-signed organizations below encourage NTIA to capitalize on this historic opportunity and stay true to the Infrastructure Investment and Jobs Act by advancing guidance that will maximize the reach and effectiveness of broadband deployments and eliminate the digital divide for as many people as possible as rapidly as possible.

Sincerely,

National and Regional Organizations

ACT | The App Association
American Farm Bureau Federation
American Seed Trade Association
ArcherDanielsMidland (ADM)
BroadbandNow
College Possible
Connect Americans Now
Corteva
Council for Affordable and Rural Housing
Digital Wish
Gigabit Libraries Network
Midwest Food Products Association
National Cattlemen's Beef Association
National Veteran Small Business Coalition
OCHIN
Student Veterans of America
USA Rice
Voices for Innovation

State and Local Organizations

California Farm Bureau Federation
California Telehealth Network
Chehalem Valley Innovation Accelerator
Greater Grenada Partnership
Mississippi Hospitality & Restaurant Association
Montana Rural Education Association
Northwoods Association of REALTORS
Oregon Association of Nurseries
Oregon Cattlemen's Association
Oregon Dairy Farmers Association
Oregon Hop Growers Association
Oregon State Chamber of Commerce
Oregon Water Resources Congress
Telehealth Alliance of Oregon
Thomas County Economic Development Alliance
Wisconsin Corn Growers Association
Wisconsin Independent Businesses
Wisconsin Potato and Vegetable Growers Association
Wisconsin Rural Schools Alliance

cc:

Honorable Maria Cantwell, Chair, U.S. Senate Committee on Commerce, Science & Transportation
Honorable Roger Wicker, Ranking Member, U.S. Senate Committee on Commerce, Science & Transportation
Honorable Frank Pallone, Chair, U.S. House Committee on Energy & Commerce
Honorable Cathy McMorris Rodgers, Ranking Member, U.S. House Committee on Energy & Commerce