



January 27, 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: Broadband Programs in Bipartisan Infrastructure Law, NTIA Docket No. 2021-0002

Dear Assistant Secretary Davidson:

The National Rural Education Association (NREA) acts as the voice of rural schools and rural communities across the country. One of the top priorities for our organization, and our 42 state affiliates, is permanently closing the digital divide by ensuring students, educators and communities have access to the broadband service and digital devices and skills needed to succeed in the 21st century classroom.

Studies [show](#) that students without broadband access at home are less likely to plan to attend college and face a digital skills gap equivalent to three years worth of schooling compared to those with home broadband access. The COVID-19 pandemic further underscored the importance of broadband connectivity as schools transitioned to remote learning. According to one estimate, as many as [17 million students](#) lacked broadband service, a device or both — the tools needed to support distance learning at home — during the pandemic. This stark divide can particularly be seen every day in rural schools, which are home to [9.7 million](#) students.

As a result of the bipartisan Infrastructure Investment and Jobs Act, the National Telecommunications and Information Administration (NTIA) has the tremendous opportunity to allocate \$42 billion to help bridge the digital divide.

These resources can make a substantial difference in the lives of unserved communities and bring greater digital equity to our nation. To achieve this goal, NTIA must ensure these broadband programs expand access to broadband internet and digital devices as efficiently and quickly as possible.

That is why NREA encourages NTIA to establish rules to ensure the resources deployed by these programs will be administered in a technology neutral manner that will allow broadband providers to use a variety of technologies to bring a reliable broadband connection to as many communities as possible. By not favoring one type of technology over another, broadband providers will be able to use the tools best suited to the unique areas that remain unserved.

Technology neutrality is particularly vital in rural areas with low population densities or rugged landscapes that can make wired deployments cost prohibitive. Ensuring providers have the flexibility they need to tailor networks to the communities they aim to serve will allow dollars available through these programs to go farther and connect more Americans.

NTIA can further ensure the efficient allocation of broadband deployment dollars with a focus on accurate mapping data. When distributing broadband funds, accurate mapping is critical in determining what areas are being unserved or underserved, preventing served areas from being overbuilt or unserved areas from being left behind. NTIA should continue to make third-party broadband mapping data available as applicants, state broadband decisionmakers and the agency navigate these programs.

On behalf of rural students, educators and communities, we thank you for your attention to this important matter and dedication to ensuring every American household has an affordable, reliable broadband connection.

Sincerely,

Dr. Allen Pratt, Executive Director
National Rural Education Association (NREA)