



May 12, 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

Dear Administrator Davidson:

As the National Telecommunications and Information Administration (NTIA) prepares to finalize guidance, draft rules and issue notices of funding opportunities to states regarding broadband resources in the Infrastructure Investment and Jobs Act (IIJA), Connect Americans Now (CAN) and the co-signed organizations encourage you to safeguard an all-of-the-above approach to broadband technology and deployment. Not only is an all-of-the-above approach consistent with the intent of Congress and the statutes of the legislation, but this approach is key to maximizing the positive impact of the IIJA broadband programs by giving states and broadband providers the flexibility they need to connect unserved and underserved communities in every part of the country.

CAN has been encouraged to see leaders in the administration, including you and U.S. Secretary of Commerce Gina Raimondo, affirm your commitment to flexibility, an all-of-the-above approach and the prioritization of unserved communities first over the past few months.

“The president has been very clear that we have to make sure that, at the end of implementing this program, every American, every tribal land, rural lands, etc. has access to high speed, affordable internet,” Secretary Raimondo [said](#) during testimony before the U.S. Senate Committee on Commerce, Science and Transportation on April 27. “The way we are implementing this program, we are allowing for flexibility on a state-by-state basis... The statute is clear, right. Unserved first.”

In February, Secretary Raimondo [stated](#), “If I deliver no other message today, I want to be clear, we do not have a one-size-fits-all approach because I don’t believe that would be successful,” during testimony before the U.S. Senate Committee on Appropriations Subcommittee on Commerce, Justice, Science and Related Agencies. “The mission here as explicitly laid out in the statute is to prioritize unserved.”

Our coalition of advocates for eliminating the digital divide has also [welcomed](#) and [applauded](#) your repeated commitment to ensuring states and broadband providers have the flexibility needed, including in regard to technology, to maximize the reach of federal broadband resources.

The urgency for action to permanently eliminate the digital divide in every American community, regardless of zip code, is greater than ever before. According to the 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.

By avoiding picking technological winners and losers and allowing broadband providers to determine what technologies best serve a given community, it allows them to determine how best to deploy networks cost-effectively and efficiently. 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. This 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.

CAN and the co-signed organizations below thank you for your leadership at NTIA and your continued commitment to providing the flexibility needed in broadband programs to enable an all-of-the-above approach to tackling the digital divide in as many communities as possible, as rapidly as possible. We encourage NTIA to establish guidance and guardrails to ensure that approach is followed in practice in order to capitalize on this historic opportunity, stay true to the Infrastructure Investment and Jobs Act and maximize the reach and effectiveness of broadband deployments.

Sincerely,

**National and Regional Organizations**

ACT | The App Association  
American Seed Trade Association  
American Telemedicine Association  
ArcherDanielsMidland (ADM)  
BroadbandNow  
College Possible  
Connect Americans Now  
Corteva  
Council for Affordable and Rural Housing  
The Final Mile Project  
Gigabit Libraries Network  
Midwest Food Products Association  
National Cattlemen's Beef Association  
National Grange  
National Rural Education Association  
National Veteran Small Business Coalition  
OCHIN  
Student Veterans of America  
Voices for Innovation

**State and Local Organizations**

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 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