

Documents for the Record – 03.05.25

1. A September 5, 2023, letter from Erin Houchin to the Governor of Indiana on BEAD.
2. A December 21, 2022 letter from Members of Congress to the FCC on BEAD.
3. A March 4, 2025, letter from AGC to Subcommittee leadership on BEAD.
4. A February 3, 2023, letter from Senators Cruz and Thune to the FCC on broadband maps.
5. A March 5, 2025, statement from CWA on the hearing.
6. A January 12, 2023, letter from Members of Congress to the NTIA on BEAD.
7. A March 5, 2025, statement from RWA on the hearing.
8. A September 5, 2023, letter from Erin Houchin to NTIA.
9. Information from Vermont Community Broadband Board.

ERIN HOUCHIN  
9TH DISTRICT, INDIANA

COMMITTEE ON  
FINANCIAL SERVICES

COMMITTEE ON RULES

COMMITTEE ON EDUCATION  
AND THE WORKFORCE

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515-1409

WASHINGTON OFFICE:  
1632 LONGWORTH HOUSE  
OFFICE BUILDING  
WASHINGTON, DC 20515-1409  
(202) 225-5315

DISTRICT OFFICE:  
321 QUARTERMASTER CT.  
JEFFERSONVILLE, IN 47130  
(812) 288-3999

September 5, 2023

The Honorable Eric J. Holcomb  
Office of the Governor  
Statehouse  
Indianapolis, Indiana 46204-2797

Dear Governor Holcomb,

I write to share with you my request of the Assistant Secretary of Commerce for Communications and Information and National Telecommunications and Information Administration (NTIA) Administrator, Alan Davidson, regarding the Biden Administration's recent announcement Indiana would receive approximately \$870 million through the Broadband Equity, Access & Deployment (BEAD) Program.

As Indiana's 9<sup>th</sup> District Congresswoman and a former Indiana State Senator, I have worked tirelessly to expand broadband and internet service to rural communities across Indiana. In today's global economy, internet connectivity is a necessity and one all Hoosiers should have access to - whether they chose to live in Indianapolis, or Salem. As you certainly understand, constituents rely on internet access in order to receive healthcare, operate and grow their businesses, connect to educational services, and produce better agricultural results. That is why as a state senator, I worked with your administration to pass legislation to prioritize broadband internet access to unserved communities **first** and this remains a priority of mine at the federal level.

I'm proud of our combined efforts and your leadership in investing millions of dollars toward broadband deployment to these areas of zero access. This includes the Indiana Broadband Ready Communities program and the Next Level Connections program. I will continue to work as a Member of Congress to ensure everyone is connected, but we must also ensure those connections are at speeds high enough to support business, educational, healthcare and agricultural needs of the future.

As you are aware, the Broadband Equity, Access & Deployment (BEAD) Program Notice of Funding Opportunity (NOFO) administered by NTIA contains several troubling recommendations and requirements, especially as they relate to labor restrictions and technology neutrality that could delay deployment of these funds in Indiana. I know that you and your administration are already working to efficiently allocate this money and to deploy broadband as soon as possible.

In the spirit of continuing to advocate for expeditious deployment of broadband resources I have written the Department of Commerce to express my frustration with the recent NOFO. Indiana must continue to rapidly deploy resources despite the apparent political agenda within the NOFO and its shortcomings. I have included a copy of my letter for your awareness. We must carefully consider the implications of the policies proposed by the Biden Administration and not lose focus on what our constituents need – reliable internet access – not left-wing policies and wish list items.

Let us focus on the core objective of the BEAD Program and work towards expediting the process of bringing reliable broadband to our unserved areas. Once again, thank you for your leadership and shared commitment. I look forward to continuing to work with you on these issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Houchin", with a stylized, cursive script.

Erin Houchin  
Member of Congress

# Congress of the United States

Washington, DC 20515

December 21, 2022

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

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

Dear Chairwoman Rosenworcel and Assistant Secretary Davidson:

We write to express concerns regarding the Federal Communications Commission's (FCC) Broadband Data Collection program's deadline and the challenges this deadline presents for Georgia broadband leaders seeking to improve broadband access for Georgia families. As Members of Congress representing diverse communities in Georgia, we believe that federal programs to support broadband expansion must start with accurate broadband mapping. To that end, we urge the Federal Communications Commission and National Telecommunications and Information Administration (NTIA) to strengthen the challenge process for the FCC's Broadband Data Collection program by extending the deadline to receive fabric and availability challenges by at least 60 days.

Access to affordable, high-speed, and reliable broadband is critical for Georgia families to access school, work, healthcare, and more. Under H.R. 3684, the "Bipartisan Infrastructure Law", NTIA must allocate funding through a new, national location-level map developed by the FCC. The accuracy of this new map will be critical to the rollout of broadband programs, such as the Broadband Equity, Access, and Deployment (BEAD) Program.

Since 2020, ahead of much of the country, the state of Georgia has built and maintained its own location-level broadband map. We are glad that the FCC and NTIA have taken steps to work with the state of Georgia in incorporating its state-specific information and to build a national map that is as accurate as possible. However, we are concerned that the initial quality of the draft map, coupled with a potentially rushed challenge process, could jeopardize these goals.

The FCC released the underlying map fabric, a list of all serviceable locations, on September 12, 2022, and information regarding internet speeds and availability at those locations on November 18, 2022. Guidelines issued by the FCC and NTIA set a deadline of January 13, 2023, for bulk challenges to fabric and availability data. Our understanding is that these deadlines are set by FCC and NTIA and are not statutorily mandated.

We are concerned that this timeline—at six weeks, including holidays—is too short for states to submit a thorough challenge petition in the correct and comprehensive manner as determined by the FCC. Indeed, after a careful evaluation of Georgia's robust address data set, Georgia's state

broadband team has concluded that the underlying fabric may be missing as many as 220,000 unserved and underserved locations in the state, largely in rural areas.

To that end, we write to request the FCC and NTIA take steps to enable an open and accessible challenge process to better promote accurate mapping and the efficient use of federal resources. Specifically, we ask that


- The FCC extend the January 13, 2023, filing deadline for bulk challenges, including both fabric and availability challenges, by 60 days;
- The NTIA extends by 60 days its timeline for announcing BEAD Program allocations to account for challenges made by the extended deadline; and
- The FCC and NTIA commit to expeditiously reviewing any challenges they receive and to communicate to Members of Congress any issues they anticipate in reviewing all challenges received in a timely manner, including any additional resources or authorities necessary.

We are eager to work with you to provide access to affordable, high-speed, and reliable broadband for all Georgians. We look forward to your response by January 5, 2023.

Sincerely,



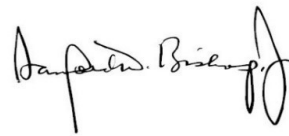
Reverend Raphael Warnock  
United States Senator



Rick Allen  
Member of Congress



Jon Ossoff  
United States Senator




Sanford D. Bishop, Jr.  
Member of Congress



Carolyn Bourdeaux  
Member of Congress



Earl L. "Buddy" Carter  
Member of Congress



Andrew S. Clyde  
Member of Congress



A. Drew Ferguson IV  
Member of Congress





Marjorie Taylor Greene  
Member of Congress



Jody Hice  
Member of Congress



Henry C. "Hank" Johnson, Jr.  
Member of Congress



Barry Loudermilk  
Member of Congress



Lucy McBath  
Member of Congress



Austin Scott  
Member of Congress



David Scott  
Member of Congress



Nikema Williams  
Member of Congress



Thomas L. Brown, President  
Todd Roberts, Senior Vice President  
Rick Andritsch, Vice President  
Ken Kubacki, Treasurer  
Jeffrey D. Shoaf, Chief Executive Officer  
James V. Christianson, Chief Operating Officer

March 4, 2025

Chairman Richard Hudson  
House Communications and Technology  
Subcommittee  
Washington, D.C. 20515

Ranking Member Doris Matsui  
House Communications and Technology  
Subcommittee  
Washington, D.C. 20515

Dear Chairman Hudson and Ranking Member Matsui:

On behalf of the Associated General Contractors of America (AGC), the leading association in the construction industry representing more than 28,000 firms, including America's leading general contractors and specialty-contracting firms – I thank you for holding today's hearing titled *Fixing Biden's Broadband Blunder*. AGC respectfully shares the following comments on the substance of this hearing.

AGC members are responsible for the construction of our nation's utility infrastructure, including broadband. Despite over \$42 billion for the BEAD program provided in the Infrastructure Investment and Jobs Act (IIJA), the National Telecommunications and Information Administration (NTIA) has been slow to approve BEAD project proposals, and no projects have broken ground. Many AGC contractors report that state BEAD offices that manage broadband expansion are unprepared on how to approach these projects and that they receive little to no guidance from the federal government. To improve the BEAD program, Congress should consider crafting further guidance for state entities that manage local BEAD projects on how to operate the program, which would help state agencies streamline the broadband construction process.

In addition, Congress should consider requiring better locates for underground broadband lines that will be expanded and serviced under the BEAD program. Contractors having inaccurate underground locations of existing broadband lines is a challenge for working on internet projects. Further, a [recent survey of AGC contractors](#) found that underground telecom companies are the most likely utility to mismark where their underground lines are. Improved underground locating will assist contractors that seek to expand broadband under BEAD and will expedite construction.

AGC members are committed to assisting with the deployment of broadband projects as provided by Congress in the IIJA. AGC thanks the subcommittee for holding this important hearing and looks forward to working with committee members on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Etchen".

Alex Etchen  
Vice President, Government Relations

CC: All members of the U.S. Senate Committee on Commerce, Science & Transportation

United States Senate  
WASHINGTON, DC 20510

February 3, 2023

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

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

Dear Assistant Secretary Davidson and Chairwoman Rosenworcel:

We are writing to request information regarding the National Telecommunications and Information Administration (NTIA) and Federal Communications Commission's (FCC) recent denial of bipartisan requests to give states, localities, tribes, and the public more time to submit challenges to the accuracy of the new National Broadband Map. After the FCC took almost two years to create this map, which will be used to determine broadband funding allocations for states, we are concerned that your agencies provided only fewer than two months to challenge the accuracy of the map's data and then refused to extend this unreasonably short deadline by a modest 60 days.

For years, lawmakers, stakeholders, and the FCC's own commissioners have recognized that the old National Broadband Map, first created by the American Recovery and Reinvestment Act of 2009, was imprecise and inadequate. As then-Commissioner Rosenworcel wrote in 2019, "[o]ur wired maps have serious inaccuracies" and "[o]ur wireless maps are so suspect they are the subject of an ongoing investigation."<sup>1</sup>

To address this situation, Congress in 2020 passed the Broadband DATA Act and gave the FCC almost \$100 million to establish a new National Broadband Map. This new, centralized map was designed to provide a more accurate, granular picture of broadband deployment. Incorporating lessons from prior mapping efforts, Congress required the FCC to develop a process for states, localities, tribes, and the public to weigh in on the map. Furthermore, Congress expected that

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<sup>1</sup> Oversight of the Federal Communications Commission (FCC): Hearing Before the Senate Committee on Commerce, Science, and Transportation, 116th Cong. (June 12, 2019) (statement of FCC Commissioner Jessica Rosenworcel), <https://www.commerce.senate.gov/services/files/318C3880-7A5B-4BF9-9562-EF2F6B37DA2F>.



federal, state, and local programs that use taxpayer money to pay for broadband deployment would rely on this new map to minimize duplicative funding and wasteful overbuilding. Indeed, Congress made that expectation explicit in the Infrastructure Investment and Jobs Act (IIJA), which tied \$42.45 billion in Broadband Equity, Access, and Development (BEAD) funding to the results of the new National Broadband Map.

Despite repeated assurances from Chairwoman Rosenworcel that the FCC could update the National Broadband Map in a matter of months, it took the FCC until November 2022 to release the first draft of the new National Broadband Map.<sup>2</sup> What is more, after taking almost two years to create the map, the NTIA and FCC gave states, localities, tribes, and the public just 56 days over the Thanksgiving, Christmas, and New Year's Day holidays to submit challenges to the accuracy of the map's data. Given the significant level of work required to submit challenges and the need to ensure that states are not unfairly deprived of their share of taxpayer BEAD funding, this time frame was overly condensed. Assistant Secretary Davidson seemingly acknowledged this fact when he publicly stated in December 2022 that he was "incredibly uncomfortable" with this short deadline.<sup>3</sup> However, when a bipartisan group of federal, state, and local elected officials<sup>4</sup> asked for a mere 60-day extension of the deadline, the NTIA and FCC flatly rejected their requests.<sup>5</sup>

We are concerned by the NTIA and FCC's lack of cooperation with elected officials and stakeholders given the amount of work required and the short-term nature of the relief requested. The NTIA and FCC should allow for more time to submit challenges, particularly when the map itself was so long in the making. As members of the Senate Commerce Committee and senators representing constituents who have asked for more time to submit challenges, we ask your agencies to explain their decisions and provide a clear plan for addressing concerns relating to the curtailed challenge process, specifically for purposes of ensuring fair allocation of BEAD

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<sup>2</sup> In March 2020, then-Commissioner Rosenworcel testified in the Senate that the FCC could "radically improve" its broadband map "within three-to-six months." Review of the FY2021 Budget Request for the FCC: Hearing Before the Subcommittee on Financial Services & General Government of the Senate Committee on Appropriations, 116th Cong. (Mar. 10, 2020) (response of FCC Commissioner Rosenworcel to Sen. Lankford). In March 2020, she also testified in the House that the agency could fix its map in "just a few months." FCC Budget Request for FY2021: Hearing Before the Subcommittee on Financial Services & General Government of the House Committee on Appropriations, 116th Cong. (Mar. 11, 2020) (statement of FCC Commissioner Jessica Rosenworcel). A year later, in a March 2021 when the map had still not been updated, the Senate Commerce Committee was told that the map would be ready by summer 2021.

<sup>3</sup> David B. McGarry, *NTIA's Davidson Touts FCC Map, Expresses Worry about Challenge Deadline*, Broadband Breakfast (Dec. 16, 2022), <https://broadbandbreakfast.com/2022/12/ntias-alan-davidson-touts-fcc-map-expresses-worry-about-challenge-deadline/>.

<sup>4</sup> See, e.g., Letter from Chairwoman Maria Cantwell, et al. to FCC Chairwoman Jessica Rosenworcel and Assistant Secretary of Commerce Alan Davidson (Dec. 22, 2022), <https://subscriber.politicopro.com/f/?id=00000185-3b28-de47-a3e7-7fa847f90000>; Letter from Texas Comptroller Glenn Hegar to FCC Chairwoman Jessica Rosenworcel and Assistant Secretary of Commerce Alan Davidson (Dec. 13, 2022).

<sup>5</sup> National Telecommunications and Information Administration (NTIA), *Advancing Internet for All*, NTIA Blog (Jan. 13, 2023), <https://www.ntia.doc.gov/blog/2023/advancing-internet-all>.

dollars among states. Please give responses to the following questions no later than February 10, 2023:

1. How will the NTIA and FCC ensure that each state is not deprived of its fair share of BEAD funding due to National Broadband Map inaccuracies and the truncated challenge process timeline?
2. Given that the FCC took 691 days to release the first draft of the new National Broadband Map, why did each agency believe that 56 days was a sufficient amount of time for states, localities, tribes, and other stakeholders to submit challenges to the map that will be used to allocate BEAD funding among states?
3. Please explain why states, localities, tribes, and other stakeholders were given only 56 days to challenge the data submitted by hundreds of broadband Internet service providers, while those service providers were given more time (60 days) to respond to challenges about their own data sets.
4. Given the specific concerns highlighted by lawmakers and localities regarding the need to ensure each state is allocated its fair share of BEAD funding, why did each agency deny bipartisan requests to extend the challenge process by 60 days?
  - a. Please explain the decision-making process each agency used to decide to decline the requests for an extension beyond January 13<sup>th</sup>, including whether the two agencies reached a consensus on the issue.
5. The NTIA has targeted June 30, 2023 as the date by which it will announce funding allocations under the IIJA's BEAD program. In a recent blog post, the NTIA claimed that "a delay in the timeline would mean a delay in providing funding to communities who desperately need it . . . ." <sup>6</sup>
  - a. What specific problems would arise if the June 30, 2023 target is extended into July or August 2023?
  - b. Does the NTIA have target dates for releasing BEAD funds? If so, what are those targets and how would they be affected by a 60-day extension of the challenge deadline?
6. In a recent blog post, the NTIA stated that the request for more time "will not address many of the process concerns we have heard." <sup>7</sup>
  - a. Please list all of the process concerns the NTIA has heard regarding the January 13<sup>th</sup> deadline.

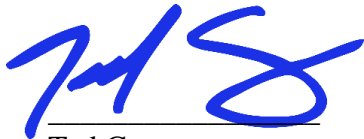
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<sup>6</sup> *Id.*

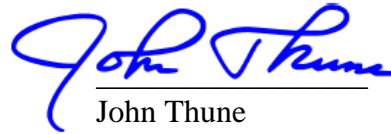
<sup>7</sup> *Id.*

- b. Please identify specifically those concerns that no additional amount of time could address, even in part.
- 7. Many stakeholders believed they had until January 13<sup>th</sup> to submit location challenges to the Broadband Serviceable Location Fabric that will be considered in allocating state BEAD funding.
  - a. Please specify the final date, or approximate final date, on which Fabric location challenges had to be submitted to be factored into the calculation of state BEAD allocations.
  - b. What specific outreach efforts did the NTIA and the FCC perform to ensure states, localities, tribes, and other stakeholders were aware of this deadline?

Sincerely,



Ted Cruz  
United States Senator



John Thune  
United States Senator

**Statement of the Communications Workers of America (CWA) to House Committee on Energy and Commerce, Subcommittee on Communications and Technology hearing,**

March 5, 2025

The Communications Workers of America (“CWA”) represents working people in telecommunications, media, information technology, public service, manufacturing, airlines, and other fields. Since 2006, through its “Speed Matters” campaign, CWA has advocated in support of efforts to help bring affordable, high speed Internet to all Americans while creating quality jobs.<sup>1</sup>

CWA members are broadband technicians and support representatives at many of the nation's large and small broadband providers who hear from customers daily about the problems of limited bandwidth over outdated or inadequate technologies. Through their union, CWA members advocate in support of public investment and oversight to support universal access to high quality internet access for all Americans. CWA advocated for robust broadband deployment funding in the Bipartisan Infrastructure Law to definitively address the digital divide and find common ground across partisan divides.<sup>2</sup>

As states developed their plans for the Broadband Equity, Access, and Deployment (BEAD) Program, CWA members across the country brought their technical knowledge to state broadband offices, sharing insights on local deployment challenges and different broadband delivery methods. CWA local leaders held hundreds of meetings with state officials, undertook community outreach to raise the profile of broadband investments, and worked together with

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<sup>1</sup> CWA, “Speed Matters: CWA's Campaign for High-Speed, Universal Internet Access for Jobs and Economic Growth,” (Oct. 1, 2006), [https://cwa-union.org/news/entry/speed\\_matters\\_cwas\\_campaign\\_for\\_high-speed\\_universal\\_internet\\_access\\_for\\_jo](https://cwa-union.org/news/entry/speed_matters_cwas_campaign_for_high-speed_universal_internet_access_for_jo).

<sup>2</sup> See CWA, “CWA Statement on the Passage of the Infrastructure Investment and Jobs Act,” (Nov. 6, 2025), <https://cwa-union.org/news/releases/cwa-statement-on-passage-of-infrastructure-investment-and-jobs-act>; CWA's comments in response to NTIA's Notice and Request for Comment Infrastructure Investment and Jobs Act Implementation, Docket No. 220105-0002, RIN 0660-ZA33, NTIA-2021-0002 (Feb. 4, 2022), [https://downloads.regulations.gov/NTIA-2021-0002-0213/attachment\\_1.pdf](https://downloads.regulations.gov/NTIA-2021-0002-0213/attachment_1.pdf).

industry to promote investment in high quality training programs.<sup>3</sup> As of February 2025, CWA members served on 9 state and local broadband advisory boards.<sup>4</sup>

### **Fiber is the best performing technology of today and tomorrow**

CWA members know from on-the-job training and experience that fiber-optic broadband is superior to other technologies. In 2022, CWA commissioned a report from an engineering firm to compare the costs and quality of fixed wireless versus fiber-optic broadband technologies for rural communities. The report found that “fiber represents the most fiscally prudent expenditure of public funds in most circumstances because of its longevity and technical advantages.”<sup>5</sup> CTC’s cost analysis of fiber and fixed wireless deployments found that while fiber’s upfront capital costs are higher than those of fixed wireless in many circumstances, the total cost of ownership over 30 years is comparable for fiber and fixed wireless, and fiber provides much higher quality service.<sup>6</sup>

Similarly, low-earth-orbit satellite service has limited bandwidth – as more users connect to a given satellite network, speeds drop, making large-scale adoption impractical.<sup>7</sup> Satellite also has inconsistent speeds and inadequate upload speeds to meet the current definition of

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<sup>3</sup> Masha Abarinova, “With BEAD looming, workforce safety remains a big problem,” Fierce Network (Oct. 10, 2024), <https://www.fierce-network.com/broadband/bead-looming-workforce-safety-remains-big-problem>; Labor Tribune, “Missouri adopts CWA Labor standards for \$1.7B broadband expansion program,” (Jan. 15, 2024); Tucson.com, “Arizona opinion: Broadband buildout requires good local workforce,” (Apr. 10, 2024), [https://tucson.com/opinion/column/arizona-opinion-broadband-buildout-requires-good-local-workforce/article\\_ea4b53fe-f5b4-11ee-8fac-df4da81be811.html](https://tucson.com/opinion/column/arizona-opinion-broadband-buildout-requires-good-local-workforce/article_ea4b53fe-f5b4-11ee-8fac-df4da81be811.html); Press Release, “CTC Partners with CWA to Implement Communications Workers of America Broadband JATC-Upper Midwest Apprenticeship Program,” CTC (Sep. 11, 2024), <https://www.goctc.com/ctc-partners-with-cwa-for-apprenticeship-program>; Sean Buckley, “Lighting up the next-generation fiber broadband workforce,” Lightwaveonline (July 18, 2024), <https://www.lightwaveonline.com/broadband/article/55089280/lighting-up-the-next-generation-fiber-broadband-workforce>.

<sup>4</sup> As of February 2025, CWA members served on state and local broadband taskforces in Arizona, Idaho, Louisiana, Michigan, Minnesota, Nevada, Pennsylvania, Tennessee and Wisconsin.

<sup>5</sup> CTC Technology, “Fixed Wireless Technologies and Their Suitability for Broadband Delivery”, 49-51 (June 2022), <https://www.benton.org/sites/default/files/FixedWireless.pdf>.

<sup>6</sup> *Id.*

<sup>7</sup> Newsweek, “Satellite May Sound Like the Future, But it Could Stick Broadband Users in the Past” (September 6, 2023), [www.newsweek.com/satellite-may-sound-like-future-it-could-stick-broadband-users-past-1824701](https://www.newsweek.com/satellite-may-sound-like-future-it-could-stick-broadband-users-past-1824701).

broadband.<sup>8</sup> Starlink satellites have a short lifespan of approximately five years, requiring continuous spending on launches, maintenance, and user equipment upgrades just to keep the current service running.<sup>9</sup>

### **A well-trained workforce and quality networks go hand-in-hand**

CWA advocates for long-term sustainability in the telecommunications industry when it comes to investments in infrastructure *and* investments in people. In creating the BEAD program, Congress recognized that a well-trained workforce and good jobs go hand-in-hand with a well-built network that will be a good investment of public dollars.

Unfortunately, in recent decades, the telecommunications industry has engaged in a race to the bottom to cut costs and increase profits through union-busting and outsourcing of construction to low-road contractors that fail to pay living wages or properly train workers. Contractors that lack proper training and safety protocols can endanger workers and the public, and affect service quality. Telecommunications work has considerable safety implications. CWA members have seen issues like ungrounded strands causing electrocution risk to workers and the public, and contractors using weak bolts to secure heavy cables, increasing the likelihood that cables will fall and injure the public. In a nationwide survey of CWA technician members, respondents reported that contractors cause quality problems leading to higher costs (96%), service quality problems for customers (81%), and safety risks for workers or the public (57%).<sup>10</sup> Unsafe work both endangers the public and can cause outages, service quality issues, and network resiliency issues. For example, the October 2007 Guejito Fire in California, which was linked to 40 firefighter injuries and two fatalities, was ignited when a Cox Communications lashing wire came into contact with an SDG&E 12kV overhead conductor. After the fire, San

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<sup>8</sup> Starlink reports average upload speeds of 5 to 20 Mbps, below what is necessary for modern broadband applications, <https://www.starlink.com/legal/documents/DOC-1400-28829-70> (last accessed February 16, 2025).

<sup>9</sup> Space Magazine, Starlink satellites: Facts, tracking and impact on astronomy (January 30, 2025), <https://www.space.com/spacex-starlink-satellites.html>.

<sup>10</sup> Communications Workers of America, "AT&T's Web of Subcontractors: Building Next Generation Networks with Low-Wage Labor," October 2020, <https://cwa-union.org/sites/default/files/20201005attsubcontractorreport.pdf>.



Diego Gas and Electric (SDG&E) documented a 3.3-foot clearance between the SDG&E conductors and Cox lines, which violated state safety requirements. Similarly, after the October 2020 Silverado Fire in Orange County which forced 60,000 people to evacuate their homes, Southern California Edison reported that a lashing wire that was attached to an underbuilt telecommunication line may have caused the ignition of the fire.<sup>11</sup>

Work conditions also affect the ability to keep a stable and well-trained workforce. Wages in the telecommunications sector have stagnated, particularly for low-wage workers. Productivity growth is a standard benchmark for wage growth, and typical wage growth in the telecommunications industry has consistently lagged behind productivity growth in the economy as a whole.<sup>12</sup> The lowest-wage telecommunications workers (at the 10th percentile in the wage distribution) have seen inflation-adjusted wages fall 0.3% annually since the 1970s, while the median telecommunications worker wage increased just 0.4% annually, compared with 1.8% annual productivity growth in that period.<sup>13</sup> During that time period, union density also declined steeply, from the majority (roughly 60%) of telecommunications workers represented by a union in the 1970s to about 11% today.<sup>14</sup>

Wage stagnation translates into difficulty hiring and retaining workers, and creates problems for the stability and health of the telecommunications labor market. For example, a 2022 survey of NTCA-member companies found that 58% of respondents are experiencing a longer average recruiting time for new hires in hourly positions compared to three years

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<sup>11</sup> Joint Reply Comments of Communications Workers of America, District 9 and the Coalition of California Utility Employees on “One-Touch Make-Ready” Proposal, April 28, 2021, Order Instituting Investigation into the Creation of a Shared Database or Statewide Census of Utility Poles and Conduit in California, I.17-06-027, And Related Matter, R.17-06-028, pp. 8-9.

<sup>12</sup> John Schmitt and Jori Kandra, Economic Policy Institute, Decades of Slow Wage Growth for Telecommunications Workers (Oct. 2020), <https://www.epi.org/publication/decades-of-slow-wage-growth-for-telecommunication-workers/>.

<sup>13</sup> Id.; Telecommunications Interagency Working Group: Recommendations to Address Workforce Needs, Submitted to the United States Congress, January 13, 2023, <https://www.fcc.gov/document/telecom-interagency-working-group-report-workforce-needs>.

<sup>14</sup> Bureau of Labor Statistics, “Union Members - 2024,” <https://www.bls.gov/news.release/pdf/union2.pdf>, January 28, 2025.

earlier.<sup>15</sup> In a survey of CWA technicians who left employment at AT&T between 2016 and 2021 – often due to the job cuts by the telecom giant – 74% stated they would be interested in returning to the broadband workforce if a good job were available. As one technician stated, “There are no good jobs in the broadband sector. Companies want people with 10-15 years experience and want to pay them \$15/hr.” Another technician stated, “too often experienced telecom individuals are underpaid and overworked... [until companies change this] the best talent will always look elsewhere.”<sup>16</sup>

We cannot expect to have the workforce needed to build and maintain our networks if we do not create good jobs that will attract and retain a well-trained workforce. The BEAD program recognizes this problem. In creating BEAD, Congress required that states must consider an applicant’s labor practices. NTIA provided further guidance for states on what could be included in that category, and states were given the flexibility to adapt their program to the specific workforce demands in their state. While wages have stagnated for telecom technicians in the past few decades due to the factors discussed above, Congress recognized that BEAD was an opportunity to incentivize employers to invest more in training and career pathways for technicians, and create the sustainable workforce that will ultimately be necessary to keep Americans connected.

**States have put significant time and resources into BEAD and are now ready to make awards. There is broad bipartisan support against any pause or overhaul of the BEAD program.**

Across the country, 30 states are already reviewing and accepting bids for work, and four have already finished granting and have received full approval for their programs.<sup>17</sup> States have

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<sup>15</sup> NTCA, 2022 Compensation + Benefits Report, <https://www.ntca.org/publications/human-resources/2022-compensation-benefits-report> (last visited Jan. 5, 2023)

<sup>16</sup> Communications Workers of America, Characteristics of the Broadband Labor Market, [https://cwa-union.org/sites/default/files/2024-04/cwa\\_broadband\\_labor\\_market\\_slide\\_deck.pdf](https://cwa-union.org/sites/default/files/2024-04/cwa_broadband_labor_market_slide_deck.pdf).

<sup>17</sup> NTIA, “BEAD Progress Dashboard,” <https://www.ntia.gov/funding-programs/internet-all/broadband-equity-access-and-deployment-bead-program/progress-dashboardprogress-dashboard>

invested tremendous time and resources into planning the best and most cost-effective solutions for their communities, and the flexibility of the program has meant that they have been able to tailor their program to their needs. Broadband offices have hired staff, mapped out service areas, completed challenge processes, and worked with industry. Internet service providers have also invested significant time and effort to engage state-by-state on BEAD proposals and companies have planned their capital investments to dovetail with BEAD opportunities.

There is broad bipartisan consensus among state officials that BEAD awards and deployments should be allowed to move forward. At an American Enterprise Institute webinar on the BEAD program, state broadband officials from Louisiana, Virginia, and Colorado cautioned against a pause and significant overhaul of the BEAD program.<sup>18</sup> This sentiment was shared by Sens. Dan Sullivan, Shelly Capito and Jacky Rosen during Howard Lutnick's confirmation hearing as the Secretary of Commerce in January.<sup>19</sup>

Every state participated in the program and received approval from NTIA on their initial proposals. States are now on the cusp of getting shovels in the ground. Pressing pause on the program now would be a tremendous waste of resources. While NTIA could provide waivers to states that want to pause and adjust their state plans, NTIA should not take a wholesale approach of mandating changes to state plans that would slow down deployments.

Unnecessary delay and upending of the program would punish states that have been diligent and have worked to enact their plans as efficiently and effectively as possible.

Residents in rural and unserved areas have waited long enough. Many states are ready to award the funds and build networks and should not be slowed down with revised standards,

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<sup>18</sup> Jake Neenan, "Don't Hit Pause Button on BEAD, Say State Broadband Officers," Broadband Breakfast (Jan. 9, 2025),

<https://broadbandbreakfast.com/dont-hit-pause-button-on-bead-say-state-broadband-officers/>.

<sup>19</sup> Linda Hardesty, "Some Republican senators are concerned about a pause to BEAD," Fierce Network (Feb. 7, 2025),

<https://www.fierce-network.com/broadband/even-some-republican-senators-are-concerned-about-pause-bead>.

new mandates or requirements. If NTIA wants to offer additional flexibility, it can do so through waivers for particular states, and not delay states that are ready to move forward today.

Respectfully submitted,

/s/ Nell Geiser

Nell Geiser

Director of Research

Communications Workers of America

**Congress of the United States**  
**Washington, DC 20515**

January 12, 2023

Hon. Alan B. Davidson  
Assistant Secretary for Communications and Information  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

Dear Assistant Secretary Davidson:

We write to express our concern with the length of the challenge period for the Federal Communications Commission (FCC) draft National Broadband Map ("Map") and the impact it will have on the National Telecommunications and Information Administration's (NTIA) Broadband Equity, Access, and Deployment (BEAD) Program.

Upon review of the timeline set forth by the NTIA, we do not believe that sufficient time has been provided to receive appropriate public input and participation in the challenge process. As you know, the amount of BEAD funding that each state receives is dependent on the accuracy of the Map, underscoring the importance of this process.

On November 18, 2022, the FCC released a draft of the Map. This release began an eight-week period, set to end on January 13, 2023, which the NTIA has stated is the "best opportunity" for eligible entities to submit challenges to the Map and guarantee that the FCC will be able to include such feedback and input in the final Map used to allocate BEAD funding. We believe it is critical that the NTIA provides adequate time and encouragement for the public to review the draft Map and submit challenges to ensure an accurate final product.

Unfortunately, the eight-week challenge period has caused serious problems for our constituents and stakeholders. We have heard from constituents and stakeholders that this comment period, which included the 2022 holiday season, is insufficient to thoroughly review the Map, collect data, and prepare challenges. Providing enough time for the challenge process is especially important given that we already know that many rural communities are missing from the Map, many of which lack the resources or ability to file expedient challenges without additional technical assistance or guidance.

Our concern about the brief period allowed for review, comment, and challenge to the Map has also been raised by several states, which have already asked the NTIA to extend the challenge period.

Therefore, we respectfully request that the NTIA extend the eight-week challenge period beyond January 13, 2023, to ensure that interested constituents and stakeholders have time to submit challenges. Without an extension, we are deeply concerned that the final Map will be inaccurate, perpetuate existing coverage gaps, and result in a disproportionate distribution of necessary resources away from those communities that need the most assistance. Simply stated, a poorly developed final Map will undermine the success and potential of the BEAD program.

To better understand the development of the Map and decisions behind the current challenge process, we respectfully request your attention and timely responses to the following questions:

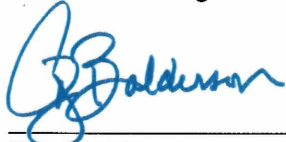
- Is the NTIA concerned that the eight-week challenge period for the Map will result in inaccurate allocation of BEAD funding and, potentially, exclude rural areas with limited coverage that are most in need of broadband infrastructure?
- How is the NTIA engaging with state governments and stakeholders to ensure they have the resources necessary to reach all constituencies to submit accurate challenges?
- Has the NTIA seen success in working with the FCC to assist with their outreach efforts so eligible entities can file a challenge? If so, can you provide examples?

Thank you for your attention to this matter. We look forward to working with you as we move through this process.

Sincerely,



John Joyce, M.D.  
Member of Congress



Troy Balderson  
Member of Congress



Mike Kelly  
Member of Congress



Robert B. Aderholt  
Member of Congress



Dan Meuser  
Member of Congress



Guy Reschenthaler  
Member of Congress



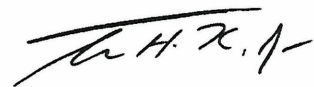
Glenn "GT" Thompson  
Member of Congress



Hal Rogers  
Member of Congress



Eric A. "Rick" Crawford  
Member of Congress



Thomas H. Kean, Jr.  
Member of Congress





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Burgess Owens  
Member of Congress



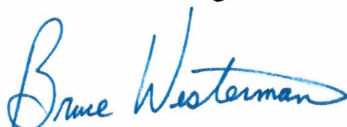
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Julia Letlow  
Member of Congress



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Mike Flood  
Member of Congress



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Bruce Westerman  
Member of Congress



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Greg Pence  
Member of Congress



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Jack Bergman  
Member of Congress



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Barry Moore  
Member of Congress



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Beth Van Duyne  
Member of Congress



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Michael Guest  
Member of Congress



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Gus M. Bilirakis  
Member of Congress



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Bill Johnson  
Member of Congress



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Blaine Luetkemeyer  
Member of Congress



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John R. Moolenaar  
Member of Congress



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Brad Finstad  
Member of Congress



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Marcus Molinaro  
Member of Congress



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Jake Ellzey  
Member of Congress

Enclosures

cc: Hon. Jessica Rosenworcel, Federal Communications Commission



To: House Energy and Commerce Committee Staff

From: Carri Bennet, RWA Outside General Counsel ([carri.bennet@wbd-us.com](mailto:carri.bennet@wbd-us.com))

Date: March 5, 2025

Re: Statement Regarding March 5<sup>th</sup> Communications and Technology Subcommittee Hearing

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The Rural Wireless Association, Inc. ("RWA") is a 501(c)(6) trade association dedicated to promoting wireless opportunities for small rural telecommunications and broadband companies who serve consumers who reside, work, or travel in rural America. RWA's members are small rural wireless carriers seeking to serve secondary, tertiary, and rural markets. The majority of RWA's members serve fewer than 10,000 subscribers. RWA is responding to the questions raised in the March 3, 2025, letter of the House Committee on Energy and Commerce's Majority Staff regarding the Communications and Technology Subcommittee Hearing titled, "Fixing Biden's Broadband Blunder." RWA respectfully requests that this statement be accepted into the record for the above-referenced hearing.

## **I. RWA's Statement**

*How can we fix the BEAD program to remove burdens and expedite deployment?*

To remove burdens placed on BEAD program participants and expedite broadband deployment, the National Telecommunications and Information Administration ("NTIA") should permit states and subgrantees the flexibility to deploy fixed wireless and hybrid networks (fixed wireless and mobile wireless) at the onset. Robust fixed and mobile wireless coverage is one of the quickest ways to enable full participation in the economy by rural populations. Wireless networks can be deployed faster and at a lower cost than fiber.

As many rural Americans continue to be deprived of sufficient broadband access, it is critical that the time it takes to deploy broadband be limited to the extent possible. The installation and time to market for a wireless network is dramatically faster than for a fiber

deployment.<sup>1</sup> With the Infrastructure Investment and Jobs Act's ("IIJA") priority on expediency<sup>2</sup> and the short timeline for completing deployment,<sup>3</sup> focusing solely on fiber deployments would be contrary to the statute's intent.

Deployment of wireless networks in high-cost areas, at the onset, can also stretch limited IIJA funds farther as compared with the cost of fiber deployment in high-cost areas. States and Territories administering their grant funds would be inefficiently using taxpayer dollars by funding fiber deployments in high-cost areas. Caps should be placed on the use of fiber when wireless technology can be deployed at lower costs.

Program participants seeking to deploy only fiber in areas of rough, mountainous, and rocky terrain will take too long to deploy and impose too high a cost per location on U.S. taxpayers.<sup>4</sup> Where deployment of fiber would be unduly expensive or unduly time-consuming, BEAD Program funding of cost-effective wireless networks and backhaul should be permitted. Subgrantees could begin with fixed wireless networks to cover a service area and then lay fiber on the backend after the customer base is developed. For example, many RWA members use hybrid networks while the customer base matures before deploying fiber. Fixed wireless can initially offer impressive speeds to connect rural areas that have never had service and then once a subgrantee has developed the customer base, economic development will follow,<sup>5</sup> and fiber can be deployed more cost effectively and paid for by the customer base. If a customer base never develops, the sunk cost of fiber would not be wasted.

Deploying wireless networks first, followed by fiber network build out where sufficient demand exists is prudent, efficient and a means of future proofing broadband networks. Once fiber is deployed, the wireless networks can be re-used and advanced further into unserved and underserved areas. If it is not feasible to deploy fiber due to economics or terrain issues, then

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<sup>1</sup> See *Erann, Dori*, "Fiber VS wireless – the greatest debate of the decade," Ceragon (Mar. 18. 2021), available at <https://www.ceragon.com/blog/fiber-vs-wireless-the-greatest-debate-of-the-decade> ("Fiber takes months, and sometimes years, to build. On the other hand, wireless links can be installed and ready for operation in a matter of days.").

<sup>2</sup> See Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, Section 60102(h)(1)(A)(iv)(III) (2021), available at <https://www.govinfo.gov/content/pkg/BILLS-117hr3684enr/pdf/BILLS-117hr3684enr.pdf> ("IIJA") (The IIJA mandates that states prioritize projects based on "the expediency with which a project can be completed.").

<sup>3</sup> See IIJA at Section 60102(h)(4)(C) ("An entity that receives a subgrant under subsection (f)(1) for the deployment of a broadband network – shall deploy the broadband network and begin providing service to each customer that desires broadband service not later than 4 years after the date on which the entity receives the subgrant...").

<sup>4</sup> See Campbell, Sophia, et al., "The benefits and costs of broadband expansion," The Brookings Institution (Aug. 18, 2021), available at <https://www.brookings.edu/blog/up-front/2021/08/18/the-benefits-and-costs-of-broadband-expansion/> ("...prioritizing funding for fiber networks has slowed expansion into areas where it is topographically difficult to lay down fiber.").

<sup>5</sup> "Broadband for all: charting a path to economic growth," Deloitte, Report (2021), <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/process-and-operations/us-charting-a-path-to-economic-growth.pdf> (The report "found a strong correlation between broadband availability and jobs and GDP growth.").

using funding to build an expensive gigabit network that is not used would result in wasteful spending. Furthermore, as BEAD funding covers only capital expenses and not operational expenses it will be vitally important for subgrantees to have a sufficient customer base established once the funding is gone. Deploying the fiber after a wireless solution has been implemented will save subgrantees and states enormous amounts of money that can go towards operation of networks and other broadband deployment projects. While fiber deployment is important, funding hybrid networks will enable rural consumers to quickly connect to broadband services and the digital economy.

*What short-term and long-term reforms are needed to preserve access to the Universal Service Fund and update its purpose?*

To preserve universal service, Congress and the FCC need to reform the contribution mechanism which is no longer sustainable under its current framework. The contribution factor used by the FCC has increased to 36.3%<sup>6</sup> while telecommunications service revenues, which determine how much telecommunications companies must pay to the Universal Service Fund (“USF”) to support universal service programs, have declined.

To fix the problem the FCC should include broadband revenue in the USF contribution base as an immediate interim step while Congress works on a longer-term solution. USF has evolved from sustaining voice services to supporting high-speed broadband, but its funding base has declined as more and more consumers rely on broadband services rather than telecommunications services. Adding broadband revenue to the USF contribution base would more fairly align contributions with support and would assess those with a greater stake in the communications infrastructure.

Additionally, Congress should pass legislation, such as the Lowering Broadband Costs for Consumers Act of 2023 (“S. 3321”), that requires Big Tech cost causers to contribute their fair share to the fund. The Big Tech/Big Streamer companies derive enormous value from connectivity with American families and businesses while contributing little or no financial support for the middle and last mile networks, especially in rural areas. While small broadband providers continue to invest millions of dollars per year to support Big Streamers’ use cases, Big Streamers contribute nothing to the cost of continually expanding the speed and capacity of these rural networks. In other words, the Big Streamers expect to grow their revenue while contributing little or nothing to help build infrastructure to deliver their traffic in rural areas. This dynamic is increasingly untenable.

It is time for Congress to enact legislation, such as S. 3321, that will ensure that small, rural broadband providers have a mechanism for fairly recovering the cost of delivering video

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<sup>6</sup> See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Public Notice, DA 24-1245 (rel. Dec. 12, 2024), <https://docs.fcc.gov/public/attachments/DA-24-1245A1.pdf>.



streaming for free. S. 3321 would amend the Communications Act so that all beneficiaries of broadband networks in the U.S. help pay for those networks and eliminate the free ride of the largest edge providers – those that have more than 50 million users in the U.S. and have more than three percent of all U.S. network traffic. This legislation has been endorsed by over 273 companies providing rural service and over 25 state telecommunications associations.

Alternatively, RWA has previously proposed that the FCC expand the USF contribution base by assessing a small transaction fee on every commercial transaction that occurs over a broadband connection. If the FCC were to require a small one cent convenience fee to be charged for every commercial transaction that took place over broadband, the FCC could easily support the USF. The convenience fee could easily be collected at the point of the transaction by the seller who would then be responsible for remitting the penny for each transaction to the U.S. Treasury.

The transactions that take place are in the billions and billions and grow annually. They take place using broadband over websites, on mobile phones and tablets using apps, at gas stations using debit and credit cards, and at the point of sale at every brick-and-mortar store. A study should be conducted to determine how many of these transactions take place and a determination made on the exponential growth of the number of commercial transactions using broadband. Such “one cent” solution could become a way to pay for all kinds of infrastructure reform, pay down the national debt or even reduce other forms of taxation.

#### *How would you evaluate and improve the FCC’s broadband mapping process?*

The FCC’s broadband mapping process for 5G mobile coverage is currently flawed. As a result, the 4G LTE coverage at speeds of 7/1 Mbps depicted on the FCC’s National Broadband Map is vastly overstated. To ensure the accuracy of 4G LTE data submitted and thereby combat overstated coverage, the FCC is mistakenly relying on its Broadband Data Collection (“BDC”) challenge process. However, the process for challenging mobile coverage maps has many flaws. As RWA and others have previously pointed out, the mobile challenge process is ineffective, particularly in rural areas, due to the limitations of crowdsourced data and data compatibility issues in submitting bulk mobile challenges, and the Commission has failed to adequately address these concerns. Crowdsourcing data is immensely difficult to collect in rural areas given that there are few consumers in these areas to crowd source data from to challenge the maps submitted. In addition, customers of rural carriers are unable to participate in crowd sourcing the data needed for a challenge because they are not customers of the nationwide carriers and do not have the nationwide carriers’ handsets to conduct the necessary challenges. After all, there is a reason rural carriers exist – to provide coverage in areas not served by the large nationwide carriers.

Before any further broadband deployment funds are distributed by the FCC or federal and state entities relying on the National Broadband Map, the challenge process must be





modified to allow for a robust challenge process in rural areas. As a solution, RWA suggests that the FCC conduct its own drive-testing of mobile broadband availability coverage using an independent third-party to ensure accurate mapping.

The FCC should also require additional certifications and supporting data from satellite providers as they submit broadband availability data to the FCC. Satellite providers should be required to submit certain information in the *BDC Infrastructure Data Specifications*<sup>7</sup> document as well as capacity data for each state or territory for which they claim service. Reported satellite coverage can, at times, be overstated, due to each satellite's limited bandwidth. While satellite providers may be able to offer adequate broadband services in certain areas, as their subscribership increases, they will quickly run into capacity issues that will shrink coverage, leaving previously "served" areas unserved and underserved. This shrinkage needs to be accounted for rather than imputing satellite coverage as if there is actual real-world usage. RWA supports the development of a formula based on the number of anticipated customers using the satellite signal in a geographic area and their respective usage to ensure more accurate satellite coverage.

*What are ways to streamline the permitting process at the Federal, state, and local levels?*

To best streamline the permitting process, there needs to be a consistent permitting framework, set at a national level but flexible enough to accommodate local needs and interests. Such a framework will best serve the public interest and ensure rapid broadband deployment across the U.S.

Of note, RWA supported the introduction of the American Broadband Deployment Act ("ABDA"), which would codify several deployment streamlining orders and interpretations that the FCC has adopted over the past ten years. ABDA would also improve siting on federal lands and reduce unnecessary red tape for applications to deploy or improve communications networks. Reintroducing ABDA in this Congress would go a long way toward ensuring that every American can quickly have access to high-quality broadband networks.

Thank you for your consideration. Please do not hesitate to reach out if you have any questions.

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<sup>7</sup> See *BDC Infrastructure Data Specifications* link: <https://us-fcc.box.com/v/bdc-infrastructure-spec>.

ERIN HOUCHIN  
9TH DISTRICT, INDIANA

COMMITTEE ON  
FINANCIAL SERVICES

COMMITTEE ON RULES

COMMITTEE ON EDUCATION  
AND THE WORKFORCE

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515-1409

WASHINGTON OFFICE:  
1632 LONGWORTH HOUSE  
OFFICE BUILDING  
WASHINGTON, DC 20515-1409  
(202) 225-5315

DISTRICT OFFICE:  
321 QUARTERMASTER CT.  
JEFFERSONVILLE, IN 47130  
(812) 288-3999

September 5, 2023

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

Dear Assistant Secretary Davidson,

I write to express my concerns with the National Telecommunications and Information Administration's recent Notice of Funding Opportunity (NOFO) for the Broadband Equity, Access & Deployment (BEAD) Program. While I am pleased to see Indiana allocated approximately \$868 million in funding, the NOFO associated with these funds raises concerns. The NOFO contains several sections related to labor requirements, mandates - specifically those related to affordability and rate regulation - as well as sections related to climate change and certain supply chain and other issues that may unnecessarily slow deployment.

As Indiana's 9<sup>th</sup> District Congresswoman and a former Indiana State Senator, I have worked tirelessly to expand broadband and internet service to rural communities across Indiana. Internet connectivity is a necessity and one all Hoosiers should have access to - whether they choose to reside in Indianapolis, or Salem.

Unfortunately, the NOFO's recommendations and mandates could delay and complicate the deployment of these funds. I am concerned that NTIA is more focused on scoring political points than expanding broadband access and the opportunities it provides. Some of these recommendations include restrictive work requirements, which could pose significant challenges in certain parts of Indiana and price controls that could severely limit or eliminate potential providers, causing higher costs.

Of particular concern is the NOFO's general prohibition on non-fiber projects. This is explicitly in conflict with Congress's intent for the funding to be technology neutral and will likely impact deployment. Additionally, state flexibility and prioritization, consistent with the law, must be protected. This includes flexibility in the workforce utilized to execute projects. As a state senator, I worked with our governor to pass legislation to prioritize broadband internet access to unserved communities **first**, and this remains a priority of mine at the federal level.

Our focus should be getting all Americans connected to the internet, utilizing a strategy that is focused on efficiently reaching the greatest number of homes for the least cost with an emphasis on providing adequate speeds and service, not enacting a political agenda out of touch with the needs of states, including my home state of Indiana. We must ensure that the criteria for broadband deployment are realistic and reasonable, not only considering each state's unique circumstances and capabilities, but also their existing laws designed to promote equal access and deter overbuilding.

In the spirit of cooperation on the important issues raised, I am requesting that you provide our office a briefing to ensure that the NOFO and its requirements do not unnecessarily hinder the deployment of these funds. Thank you for your prompt attention.

Sincerely,



Erin Houchin  
Member of Congress



Vermont Community Broadband Board (VCBB)  
112 State Street  
Montpelier, VT 05620-2601  
<https://publicservice.vermont.gov/vcbb>

March 5, 2025

Dear Mr. Chairman and Ranking Members of the House Committee on Energy and Commerce:

Vermont Community Broadband Board is pleased to contribute to the Congressional Record regarding today's hearing on the BEAD Program. We agree that changes to the program could make it much more efficient and that we need fewer guardrails. We have spent the past two plus years working to prepare for and get the most out of the program. Our suggestions are below. Thank you for your efforts and please reach out with any questions.

1. **Keep the fiber preference:** Investment in fiber is the best use of taxpayer money. It pays economic dividends in any state by creating a local infrastructure platform for economic activity and by stimulating direct, indirect, and induced job creation. It's also cheaper over the long term because it won't need to be upgraded, and maintenance is minimal.
2. **Accelerate the program:** Review is understandable, but pausing the program during review will disrupt ongoing selection processes and cause added expense and confusion for states and prospective subrecipients. In no case should states be forced to redo Initial Proposals, challenge processes, or any part of completed subgrantee selection.
3. **Provide maximum flexibility and autonomy to the states:** Most states have already successfully managed ARPA (American Rescue Plan Act) broadband infrastructure grants. We should be given greater discretion over:
  - **Technology choice:** We should retain the fiber first principle especially for Priority Projects, and states should maintain authority to choose whatever technology best suits each location and meets goals of reliability, redundancy, future proofing, and lowest cost for Non-Priority Projects.
  - **Waivers:** States should manage the many potential waivers currently envisioned.
  - **Permitting:** The current permitting process raises costs, diverting construction funds into paperwork. Remove the requirement that NTIA and NIST review all permits prior to starting any construction and exempt all aerial construction from NEPA.
  - **Prefer terrestrial infrastructure to maximize benefits to communities:** In contrast to investing in LEO/StarLink, investment in





terrestrial infrastructure, such as fiber, pays economic dividends in any state by creating a local infrastructure platform for economic activity and by stimulating direct, indirect, and induced job creation.

4. **Streamline project approval process:** Remove the final proposal requirement. Requiring the final proposal creates a significant delay in getting shovels in the ground. States can prove to NTIA that we have followed our Initial Proposal via reporting.

Sincerely,

A handwritten signature in cursive script, reading "Christine D. Hallquist".

Executive Director Christine Hallquist

