

AMERICAN CONNECTION PROJECT



February 3, 2022

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Submitted via www.regulations.gov; Attention Docket ID No.: FSA-2021-0002

To whom it may concern:

The American Connection Project Policy Coalition (ACPPC), comprised of over 175 businesses and organizations spanning across the entire country and economy, applauds the efforts of the National Telecommunications and Information Administration (NTIA) to solicit feedback and guidance as we approach broadband program design and implementation. The ACPPC has long advocated for a robust investment in broadband infrastructure, accurate mapping, and stronger state and federal coordination on broadband deployment. Our coalition applauded the passage of the *Infrastructure Investment and Jobs Act (IIJA)*, and we look forward to continued collaboration with the agency to ensure that this historic investment is implemented efficiently and closes the digital divide in communities across the country. The comments below reflect the general principles of our coalition, and it is our hope that the agency strongly considers incorporating these principles into its implementation strategy.

Communication, engagement, transparency, and accountability are critical to the successful implementation and deployment of the *IIJA*. If we are to successfully execute on delivering high-speed internet to all Americans, these areas of focus are critical as NTIA collaborates with state officials and broadband offices. ACPPC supports the federal government requiring communication, engagement, and transparency plans to be developed as part of the state proposals. Further, governors, state officials, and respective broadband offices should be involved in any conversations regarding broadband program development and implementation, as these leaders have both a strong and nuanced understanding of their state's broadband needs and the challenges within their borders. Additionally, we encourage NTIA to engage with state broadband coordinators to consider downstream implications new federal programs could have on existing state programs, preventing any inadvertent conflict with existing efforts, programs, and funding.

Secondly, broadband maps should be developed as quickly as possible, while also maintaining accuracy. Our coalition defines the term "accuracy" through the collection of metrics related to the quality and extent of service, such as download speed, upload speed, and latency. The identification and analysis of

these metrics then enable us to determine the greatest areas of need, thereby prioritizing both unserved and underserved communities, as well as anchor institutions. Where they exist and are accurate, we encourage NTIA to work with the Federal Communications Commission (FCC) to leverage already existing state-developed broadband maps as the FCC finalizes the map that NTIA is required to use for its programs. Further, a viable challenge process and a sensible crowdsourcing program should also be included, and ACPPC coalition members stand ready to partner with the FCC to promote and share the new crowdsourcing program.

Affordability and digital inclusion should remain at the forefront of the implementation discussion. ACPPC members support state and federal funding that provides much-needed assistance to low-income communities and consumers to make broadband service more affordable, while also promoting broadband adoption. With this goal in mind, we encourage NTIA to work with the FCC to continue to improve access to the newly established Affordable Connectivity Program while also ensuring the program is efficiently managed.

Furthermore, the ACPPC encourages NTIA to consider the following key principles as it develops its implementation strategy:

- **We encourage the NTIA to support state and federal funding that prioritizes deployment and sustainability of scalable networks.** These networks should deliver quality high-speed broadband services capable of meeting today's and tomorrow's communications needs across America as required by the law, while also encouraging such networks to be built in a timely manner.
- **The NTIA should also prioritize unserved locations, and then underserved areas as well as community-serving anchor institutions with limited speeds.** Specifically, funding should be prioritized in communities with the greatest number of disparities and challenges such as unserved, high-poverty areas and unserved tribal communities.
- **The coalition encourages the NTIA, FCC, and USDA to allow new funding made available through the IIJA to work in concert with existing state funding.** Many states have a long history of utilizing state funds to deploy broadband networks. These funds should serve as a complementary source of funding to the more-robust federal funding made available through the IIJA. For example, states should be allowed to use existing state funds already available to them towards the required 'matching' funds needed for the new NTIA BEAD program.
- **We encourage NTIA and the Administration to ensure consistent application of waiver processes across state grantees and projects.** This includes streamlining the applications through the use of IT product category waivers.
- **Cybersecurity is an important national security issue.** The coalition encourages the Administration to incorporate baseline guidance for grantees and states to mitigate and prevent cyber risks to our communication networks and consumers.

The American Connection Project Policy Coalition appreciates the opportunity to comment as the agency begins the implementation process of the *Infrastructure Investment and Jobs Act*. Our coalition stands ready to partner with the NTIA, other federal agencies, and state governments to collaborate to ensure the implementation of this historic investment reaches the households, businesses, and communities that are not connected today. If you have any questions or need additional information, please do not hesitate to reach out to Matthew Wohlman at mwohlman@landolakes.com or Autumn Veazey Price at alveazey@landolakes.com.

Respectfully,

American Connection Project Policy Coalition Partners:

Adaptrum	Association of Equipment Manufacturers
Agricultural Retailers Association	Agricultural Council of California
Alabama A&M University	AgriGrowth
Alltech	Alcorn State University
American Farm Bureau Federation	American Agri-Women
American Seed Trade Association	American Feed Industry Association
American Sustainable Business Council	American Soybean Association
American Tower Corporation	American Telehealth Association
Association of Public & Land-Grant Universities	Animal Health Institute
BASF	AveleCare
Baylor Scott & White	Bayer
Big Brothers Big Sisters of America	Best Buy
Boehringer Ingelheim Animal Health	Blue Cross Blue Shield Association
California Farm Bureau Federation	Bremer Financial Corporation
CapZone Group	Capital One
Center on Rural Innovation	Cargill
Ciena	CentraCare
Cisco	CHS Inc
Clearfield	ClearBlade
CoBank	Cleveland Clinic
Connected Nation	Com Net, Inc.
Cooperative Network	Compeer Financial
CUNA Mutual	Consumer Brands Association
DeLaval	Corteva Agriscience
Ditch Witch	Dairyland Power Cooperative
Ecolab	Dell Technologies
eXtension Foundation	Ducks Unlimited
Farm Journal	EYEJ: Empowering Youth, Exploring Justice
Finley Engineering	Federation of Southern Cooperatives
FMI The Food Industry Association	FMC Corporation
Germania Insurance	GEOVERSE

Google Fiber
 Gundersen Health System
 Heartland Forward
 Hershey Company
 hims & hers
 IdeaTek
 Iowa Institute for Cooperatives
 Kansas Cooperative Council
 Land O'Lakes, Inc.
 LightBox
 Mayo Clinic
 Merck Animal Health
 Minnesota Business Partnership
 Minnesota Farmers Union
 Minnesota Milk Producers Association
 Minnesota Technology Association
 Minnesota Vikings Foundation
 MOX Networks
 National 4-H Council
 National Corn Growers Association
 National Farmers Union
 National Grain and Feed Association
 National Pest Management Association
 National Rural Education Association
 Nebraska Cooperative Council
 NEED
 New Horizons Minnesota
 North State Together
 NUCA
 Oklahoma Agriculture Cooperative Council
 Oregon Farm Bureau
 PCs for People
 Partners for Education
 Power & Communications Contractors Association
 Pulse (City of Loveland)
 Randstad USA
 Rural Cloud Initiative
 Rural LISC
 Schools, Health & Libraries Broadband Coalition
 SD Association of Cooperatives
 State Agriculture and Rural Leaders
 Talkspace
 Teltech Communications
 Texas Agricultural Cooperative Council
 Gillette Children's Specialty Healthcare
 Granite Telecommunications
 HealthPartners
 Helium
 Hewlett Packard Enterprise
 IBM
 International Dairy Foods Association
 Iowa State University
 Khan Academy, Inc.
 Landus Cooperative
 Lumen
 Medical Alley Association
 Microsoft
 Minnesota Crop Production Retailers
 Minnesota Hospital Association
 Minnesota Rural Broadband Coalition
 Missouri School Boards' Association
 National Association of State Departments of Agriculture
 National Association of Counties
 National Council of Farmer Cooperatives
 National FFA Organization
 National Milk Producers Federation
 National Rural Electric Cooperative Association
 NCBA CLUSA
 Nebraska Cooperative Internet Service Providers
 Nestlé Purina
 NDSU Agricultural Affairs
 NTCA-The Rural Broadband Association
 Ocean Spray Cranberries Inc.
 Omcare Inc.
 Organic Valley
 Paige Wireless
 Pheasants Forever & Quail Forever
 Provalus
 Riceland Foods, Inc.
 Rural Community Assistance Partnership
 S2G Ventures
 Scholastic
 SCOULAR
 Silicon Harlem
 Syngenta
 Telsasoft
 TELUS Agriculture
 The Fertilizer Institute

Tillamook
Toro
Trilogy Networks
UltraSight
University of Illinois Urbana-Champaign
Valmont Industries
VistaBeam
Westchester County Association Inc.
Zoom

Topcon
Tractor Supply Company
Trimble
United States of Care
University of Minnesota
WTA-Advocates for Rural Broadband
Weyerhaeuser
Zoetis