



NATIONAL GRANGE

OF THE ORDER OF PATRONS OF HUSBANDRY

1616 H ST. NW, WASHINGTON, DC 20006 | PHONE (202) 628-3507 | FAX (202) 347-1091

American Values. Hometown Roots.

January 21, 2022

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

Dear Assistant Secretary Davidson:

Since the end of the Civil War, the National Grange has been the leading voice and advocate for rural America. While there are many issues facing rural communities, few are as critical as the digital divide that leaves millions of Americans throughout our country without access to a broadband connection. The impact of this divide has been made even more acute during the COVID-19 pandemic, adversely impacting families, students, businesses, patients, hospitals and family farms and ranches who face the challenges of no or limited connectivity.

Nationwide, nearly one-fourth of Americans in rural areas still don't have access to broadband, and rural adults are less likely to have multiple connected devices. As many as 29 percent of American farms and ranches still lack broadband access. A recent analysis of usage data suggests that as many as 120 million people are not using the internet at broadband speeds.

The National Grange was proud to support the passage of historic broadband provisions in the bipartisan Infrastructure Investment and Jobs Act. Over the next several years, the National Telecommunications and Information Administration (NTIA) will disburse funds and implement programs established by this law to dedicate \$42 billion in funding toward the vital national objective of expanding broadband and device access for Americans stuck behind the digital divide.

The highest priority for new broadband deployment must be to connect the truly unserved first as mandated by Congress. Any program that permits an end run around or weakening of the "unserved" definition and priority will lead to funding resources being diverted to areas that already have broadband and will undermine the goal of connecting all Americans.

The National Grange encourages NTIA to administer these programs in line with the mixed-technology approach outlined by Congress — allowing states and broadband providers to use an all-of-the-above approach to technology that will maximize the reach and positive impact of deployment resources. Technology solutions that work in the High Plains or the Midwest might not work in the hills and mountains of Appalachia. A technology neutral approach, that does not favor one technology over others,



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will help ensure broadband providers can use the tools best suited to differing terrains and communities, maximize the effectiveness of broadband deployment funds, and protect against wasteful duplication or overbuilding in communities already served by broadband speeds.

In addition to implementing safeguards to ensure technology neutrality, NTIA can support the effective deployment of broadband by building on the agency's commendable commitment to better broadband mapping data. By continuing to ensure third-party broadband mapping data is available to the public, state officials and broadband providers, NTIA can encourage effective and targeted deployment of resources and help ensure unserved Americans are not left behind.

Another important but often overlooked challenge to broadband expansion in rural areas is timely and cost-efficient right-of-way and utility pole access. Often the easiest and most cost-effective way to deploy broadband to remote families is to use the existing utility poles which carry electricity and telephone services. As states and territories come to NTIA seeking broadband funding, NTIA in turn should require those states and territories to ensure timely access, fair cost-sharing, and expedited resolution of pole attachment disputes in return.

NTIA's final charge must be the efficient and effective oversight of the state agencies and broadband providers who receive these funds and commit to connect the unserved first. We also need the assurance that projects are not overbuilt in some areas and absent in other areas.

To secure a future of prosperity for America's rural communities, we need to completely bridge the digital divide and ensure every American has access to the digital technologies that support success in our modern world. We encourage NTIA to capitalize on this historic opportunity to make substantial progress toward that national imperative by ensuring its broadband programs connect the greatest possible number of Americans as swiftly as possible. The National Grange stands ready to assist the NTIA in this challenge.

Sincerely,

Betsy Huber
President

cc:

Honorable Maria Cantwell, Chair, U.S. Senate Committee on Commerce, Science and Transportation
Honorable Roger Wicker, Ranking Member, U.S. Senate Committee on Commerce, Science and Transportation



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Honorable Frank Pallone, Chair, U.S. House Committee on Energy and Commerce

Honorable Cathy McMorris Rodgers, Ranking Member, U.S. House Committee on Energy and Commerce