

April 11, 2024

The Honorable Gina Raimondo
Secretary
U.S. Department of Commerce
1401 Constitution Ave. NW
Washington, DC 20230

Re: Removing Barriers to Unlock America's Infrastructure Needs

Dear Secretary Raimondo:

We are at the cusp of a great transformation in our nation's connectivity landscape. Congress has entrusted the Department of Commerce, through the National Telecommunications and Information Administration ("NTIA"), to oversee a historic investment to ensure that every American, everywhere, has access to fast and reliable broadband networks. Investment alone, however, is not enough. Our nation's potential to achieve this ambitious goal will ultimately be limited by the barriers we do not remove, a reality that is particularly acute for the members of the Wireless Infrastructure Association ("WIA"), who are focused on our potential to achieve ubiquitous fixed and mobile broadband access for every American. Accordingly, on behalf of the broadband builders and innovators WIA represents, I offer these recommendations to ensure the success of current broadband expansion efforts:

- Create predictable, proportionate, and transparent permitting processes;
- Support smart and strategic planning for long-term BEAD success:
 - Recognize the important role of fixed and mobile wireless communications to achieve universal connectivity,
 - Support the development of a highly skilled broadband workforce; and
- Prioritize spectrum availability for commercial use.

Failure to effectively address these issues has and will present barriers to the efficient deployment of fixed and mobile broadband connectivity. Your continued leadership on these topics is crucial.

I. Create Predictable, Proportionate, And Transparent Permitting Processes.

A constant refrain from our members is that the unpredictability, costs, and delays associated with obtaining permits and approvals to build—or even upgrade—infrastructure create real barriers to deployment. Ensuring predictable, proportionate, and transparent permitting processes balances the needs of government to meaningfully review applications with the needs of communities to get broadband access quickly. Appropriately tailoring the permitting process is essential to achieve the ambitious goals set forth in the landmark Infrastructure Investment and Jobs Act ("IIJA").

WIA congratulates you on the work your Department has already done on this front. NTIA has taken several steps that recognize connecting every home and business will be quickly frustrated without addressing barriers presented by ineffective or redundant permitting and approval processes. NTIA's efforts, such as [streamlining environmental reviews under NEPA](#) and [creating a uniform NHPA review process for all federal projects](#), will have an outsized effect in promoting deployment to the hardest to reach areas. This kind of innovative and broad-reaching problem-solving is needed across more agencies. Thus, I urge you to challenge the Department of Commerce, NTIA, and other agencies managing federal lands to identify additional processes that can be right-sized for the task at hand.

These actions addressing federal agencies are important. Yet, with infrastructure deployment, many of the barriers keeping shovels from the ground are at the state and local level. Indeed, the IJA funds will be the most transformative in communities that have not seen significant private investment, and therefore may be less equipped to expediently review applications compared to their more built-out neighbors. Thus, clear guidance and best practices from the federal level, implemented by states and localities, are critical to the success of these programs. NTIA has already done substantial work in providing guidance to states and championing best practices through its BroadbandUSA program and the State Broadband Leaders Network. We encourage a heavy emphasis on ensuring NTIA guidance is widely implemented. Now is the critical time for states and localities to adopt efficient and effective permitting processes, with NTIA support and resources, so that projects can be efficiently completed.

In order to maximize permit streamlining at both the federal and state level, I also encourage you to review and support H.R. 3557, the American Broadband Deployment Act. This bill includes common sense measures, consistent with current federal agency interpretations, that remove red tape for broadband projects. By acting on this legislation, Congress can solidify progress already made on improving siting processes and continue to improve the review process for federal lands.

II. Support Smart and Strategic Planning for Long-Term BEAD Success.

Smart policies go beyond just permitting reform. As the Administration continues to work with states in finalizing BEAD plans, it is critical that NTIA continue to recognize the important role Fixed Wireless Access ("FWA") will play in delivering quality broadband, quickly, to more Americans. Another looming barrier we cannot lose sight of is the need for a well-trained workforce, as funds are of little use without the women and men working to deploy and maintain the networks. Accordingly, workforce development must continue to be a critical facet of every state's BEAD Plan.

A. Supporting FWA in BEAD Will Speed Deployment and Enable Critical Mobile Connectivity.

The approval process for state's BEAD plans must recognize that FWA has become consumers' choice as the fastest growing form of broadband in competitive markets—gaining over three million subscribers each year for the past two years. Similarly, we are encouraged that NTIA has recognized the importance of mobile wireless connectivity in state BEAD planning and should look to bolster that concept in additional states. We must recognize the incredible advancements

being made in wireless broadband access technologies and encourage states to fund wireless connectivity where it is the logical choice to get the job done.

B. Workforce Development Must be a Key Component of Broadband Expansion Efforts.

The Administration's connectivity goals will not be met without states fully developing the broadband workforce necessary to meet current and future deployment challenges, including maintaining, operating, and upgrading networks to ensure the value of this investment in connectivity over the long term. Federal support for states to meet this goal is crucial. Consistent with the BEAD Notice of Funding Opportunity, NTIA must reiterate to states that funding for state-led workforce development programs is an eligible deployment expense and support thoughtful state workforce development programs.

III. Prioritize Spectrum Availability for Commercial Use.

Finally, meeting the Administration's connectivity and competition goals also depends on ensuring continued access to the spectrum necessary to meet the demands of American consumers and businesses. The Department has a unique role in the wireless ecosystem as the steward of federally licensed spectrum. Access to more licensed spectrum for commercial use is essential to meeting the continued connectivity demands of fixed and mobile broadband users and meeting another Biden Administration priority—promoting more competition in the broadband marketplace. Here, again, NTIA has taken an important step forward in its recently released National Spectrum Strategy. However, getting from a strategy to timely and effective results requires bold leadership from the Department of Commerce throughout the implementation process.

We are closer than ever to closing the digital divide in our country. Your leadership will help drive us there. On behalf of WIA, I thank you for the steps already taken and encourage the Administration to continue to build on this progress. We appreciate the opportunity to provide our feedback and look forward to further collaboration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Halley', written over a horizontal line.

Patrick Halley
President & CEO

cc: Alan Davidson, Assistant Secretary of Commerce for Communications and Information and NTIA Administrator