

ENABLING CONNECTIVITY EVERYWHERE

- Letter from the CEO
- Set a National Framework for Broadband Permitting
- Rightsize Federal Review of Communications Infrastructure Projects
- Invest In Wireless
- Create a Spectrum Pipeline to Fuel Tomorrow's Wireless Needs
- Modernize and Streamline Inefficient Federal Government Practices and Technologies
- Invest in Broadband Workforce Development for America's Communities



A Roadmap to Unlocking Connectivity Everywhere in the Next Administration

America's wireless networks offer world-class connectivity, powering nearly every aspect of American life – made possible through significant private investment paired with smart policies that prioritize deployment over bureaucratic process. Yet we are on the cusp of something even bigger—Connectivity Everywhere—every person, every organization and everything, unlocked by a set of discrete but important legal, policy, and system changes.

As we move into 2025, the Trump Administration and Congress have a unique opportunity to enact infrastructure policy reforms that will serve as a springboard for finishing 5G deployment and setting the stage for all the future G's. This is critical to America's economic success and the safety and vitality of our communities.

Reducing delays and streamlining deployment should continue to be a north star for the new Administration to ensure the ubiquitous deployment of 5G and beyond. Putting America's infrastructure needs first requires vision and a mission-driven sense of purpose.

With a mixture of common-sense reforms and strengthening existing rules, we can build on prior successes and set the stage for continued generational investments in wireless. These investments will pay off immediately in infrastructure jobs, with an exponential effect on growth in America's economy and communities. To do so we must:

- ✔ **Set a predictable, proportionate and transparent national framework for broadband permitting**
- ✔ **Rightsize federal review of communications infrastructure projects**
- ✔ **Invest in wireless**
- ✔ **Create a spectrum pipeline to fuel our nation's wireless needs**
- ✔ **Modernize and streamline inefficient Federal practices and technologies**
- ✔ **Develop the wireless workforce of tomorrow**

To the reader – there is a lot here. But there is much work to do for a more connected and competitive America. We offer the following as a reference and roadmap. Let's get to work!

Patrick Halley
President and CEO, Wireless Infrastructure Association

SET A NATIONAL FRAMEWORK FOR BROADBAND PERMITTING

“If we’re just spending these dollars without doing permitting reform, then we’re stepping on the gas and brakes at the same time.”



Incoming FCC Chair,
Brendan Carr

Priority: Enact the American Broadband Deployment Act

A consistent permitting framework set at a national level, but flexible enough to accommodate local needs and interests, is the key to sustained success for wireless infrastructure deployment.

A successful policy is:

PREDICTABLE

A clear, comprehensive and timely permit review process.

PROPORTIONATE

Application requirements prioritize colocation on shared infrastructure and are proportionate to the requested scope of work commensurate with the potential impact of the proposal.

TRANSPARENT

Applicants can track the progress of their proposal and have clear recourse where the approving authority fails to act.

To be clear, WIA values and respects the need for local permitting processes; the reforms WIA proposes all build upon that premise, but with safeguards built in where the level of review becomes unpredictable, untimely, disproportionate, or unworkably opaque.

The most important step Congress and the Administration can take is to **enact the American Broadband Deployment Act (ABDA)**. ABDA is a legislative package that would codify several major permitting reforms enacted by the FCC and rightsize federal rules for broadband permitting on federal lands to spur deployment.

ABDA Benefits:

CLEAR TIMELINES

Enshrines several existing FCC orders into law that provide predictable timelines for application processes, including “shot clocks” on permit applications for wireless facilities - this provides timelines for deciding upon an application, and “deemed granted” relief where an authority fails to act on the application in the given time. This maintains a role for municipalities, but gives them a deadline and provides industry with certainty, resulting in quicker connectivity for communities.

SET A NATIONAL FRAMEWORK FOR BROADBAND PERMITTING

“Congress is uniquely positioned to ease some of the burdensome regulatory barriers to broadband deployment.”



Rep. Buddy Carter

[Federalism and the Digital Divide: How Smart Permitting Reforms can Unleash Rural Broadband Access](#)



Priority: Enact the American Broadband Deployment Act

REASONABLE FEES

Fees charged for applications must be calculated based on actual costs, established in advance, and publicly disclosed. This creates certainty among all parties.

STREAMLINED SITE UPGRADING

Codifies FCC rules that allow existing sites to expand the compound by up to 30 feet and add additional equipment cabinets and antennas without going through further review process.

STREAMLINED ENVIRONMENTAL AND HISTORIC REVIEWS

Establishes shot clocks for applications on federally managed lands, as well as recognizing where environmental and historic reviews would be unnecessary, such as in disaster recovery areas and previously disturbed Rights of Way.

FCC:

Leadership should give voice to the importance of their prior wireless siting reforms, including defending helpful orders from subsequent challenges and identifying opportunities to continually improve its processes.

Initiate a proceeding to reinstate the concealment provisions of the 5G Upgrade Order.



Priority: Use Administrative Processes to Rightsize Environmental and Historical Review

Many of the delays and disproportionate permitting reviews are federal, specifically deriving from the implementation of the National Environmental Policy Act (NEPA), National Historic Preservation Act (NHPA), and when the federal government itself is the landlord. Enacting the American Broadband Deployment Act would address and remediate many of the problems with the current system that make federal permitting today unpredictable, disproportionate, and lacking transparency. Still, there are additional steps that Congress and the Trump Administration should consider while ABDA passage is pending.

Environmental and Historical Permitting

Environmental and historic permitting continue to be a barrier to deployment for many key industries, including communications infrastructure. While we respect the important goals of protecting our nation's environmental and historic resources, these processes have become so pervasive and complex that they can significantly hamper investment. Further, the broad scope of these rules can easily be weaponized to erect effective barriers to infrastructure deployment. The Administration, along with Congress, can take several steps to rightsize these processes and ensure that rules are having their intended effects without burying construction in red tape.

CLARIFY THE DEFINITION OF MAJOR FEDERAL ACTION/ UNDERTAKING FOR NEPA AND NHPA REVIEW

As a foundational matter, the definition of Major Federal Action, or Undertaking for NHPA, has become overly expansive to include any action which involves the federal government. This has led to an endless loop of requiring new regulations to exempt categories of everyday activities from purchasing office supplies to making insubstantial modifications to existing infrastructure. The Trump Administration can significantly limit unnecessary reviews by ensuring that environmental and historic reviews are only triggered for those projects with substantial control and responsibility of the federal government that are actually likely to have significant environmental and historic effects.



Priority: Use Administrative Processes to Rightsize Environmental and Historical Review

ENSURE POTENTIAL ENVIRONMENTAL AND HISTORIC IMPACTS ARE REASONABLY LIMITED TO THE ACTUAL EFFECTS OF PROJECTS

The scope of environmental and historic reviews continues to expand, requiring industry to account for environmental and historic impacts far removed from the proposed project. The most egregious example being a recent proposal to amend SEC climate disclosure rules that would have required covered entities to account for the environmental impacts of their vendors and suppliers, regardless of whether the company had any control over these entities. By narrowly tailoring the examined environmental and historic impacts of a project to those effects reasonably related to the proposal, the new Administration can ensure that projects are completed in a timely manner and any required mitigation would directly benefit the surrounding environmental and historic resources.

FCC:

The FCC and ACHP should modify the National Programmatic Agreement and the Collocation Agreement to exclude additional types of deployments from NHPA review.

**RIGHTSIZE
FEDERAL
REVIEW OF
COMMUNICATIONS
INFRASTRUCTURE
PROJECTS**



“Without accurate, complete data to determine processing times, the agencies cannot track the extent to which they are complying with the statutory requirement that they grant or deny applications within 270 days.”

Priority: Provide Strong Executive Oversight to Allow for Prompt Siting on Federal Lands

Siting on federal lands continues to be more difficult than comparable state and private properties. Improving the process for siting infrastructure on federal lands will contribute to enhanced public safety in these areas along with enhancing American’s use and enjoyment of these shared resources. Further, deploying on federal lands will be a key consideration in achieving universal connectivity and delivering fixed and mobile communications services to rural communities.

THE TRUMP ADMINISTRATION

It has been over five years since President Trump signed [Executive Order 13821](#) to improve siting on federal lands. Federal land management agencies report directly to Secretaries in the President’s cabinet, making Executive oversight a key consideration. The incoming Administration must ensure that these reforms are promptly implemented and encourage agencies to continually improve the siting process.

CONGRESS

Several proposals have been considered that would make significant improvements to siting on federal lands, including the American Broadband Deployment Act. Additionally, increased oversight like that provided in Senator Thune’s Support Accelerating Broadband Permits Act would provide crucial insights as to where the choke points are in the federal permitting process and help implement improvements.

In addition, Congress should seek to increase parity between deployments on Federal and private lands. Specifically, Federal land use fees are not limited to the cost incurred by the land management agency in processing the application. These fees are also set on a case-by-case basis, contributing to inconsistent processes. These fees should be tied to the direct cost to the agency or, at a minimum, create a national fee schedule that will provide industry with the certainty to properly account for the cost to deploy.

Congress should also examine allowing fees to be paid directly to the federal land management agencies evaluating the project. So called “fee retention” would ensure that fees from these deployments are invested back into the agencies to further modernize and improve the federal land siting process.

INVEST IN WIRELESS

“Terrestrial fixed wireless residential connections increased from 4.5 million to 6.8 million, approximately a 51% increase between 2022 and 2023.”

FCC 2024 Communications Market Report



Priority: Tap Existing Broadband Funding to Deploy Wireless

Despite significant and sustained investment from industry—there was \$11.6B in cellular network construction last year—some areas of the United States remain persistently unconnected. Access to broadband, both fixed and mobile, should not depend on where you live. In these remote and hard to reach areas, the federal government can play an important role in lowering barriers to deployment through targeted investments. This is a smart investment—connectivity is a well demonstrated lever enabling American prosperity, allowing individuals to access jobs, training and educational services, healthcare, and most importantly, each other.

National connectivity is within our grasp if we can execute on it. Here’s how the federal government can make the most of limited funds:

NTIA

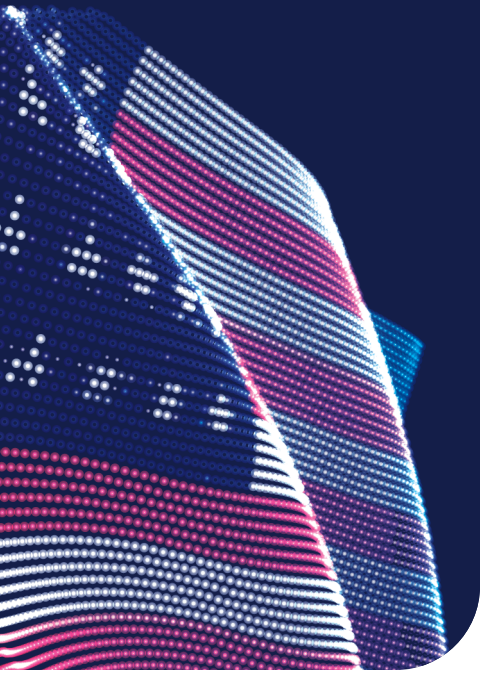
The \$42 billion BEAD program is poised to deliver universal connectivity with a few key adjustments.

Federal funds should generally be awarded to projects that can deliver the services consumers need; and deliver it quickly.

Congress conceived of the BEAD program as technologically neutral, based only on the capabilities of the broadband service. Even though fixed wireless has become the fastest growing form of broadband across the country because of its quality of service, speed to deployment, and price advantages, it is not a “priority” broadband service under the current NTIA program. NTIA should restore technological neutrality in accordance with Congress’ vision of the program.

Permitting Progress. NTIA has made substantial progress in tackling BEAD permitting challenges. It should continue to encourage states to streamline permitting for BEAD projects to ensure the funds are not held up by municipal delays.

Maximize Mobility. While BEAD’s goal is fixed connectivity, many states are now focused on how to use it to provide seamless mobile connectivity in unserved areas as well. NTIA should encourage states to [make use of “non-deployment” funds](#) to deploy the wireless infrastructure necessary to build out mobile networks as well.



Priority: Tap Existing Broadband Funding to Deploy Wireless

NTIA

Fulfill BEAD's Potential as a Jobs Program. Investment in infrastructure puts people to work. NTIA and States should work together to make sure they have the workforce necessary to finish the job before the job begins. That starts with training the broadband workforce today. Industry intermediaries are a particularly effective means of achieving this goal and should be appropriately funded.

Coordinate Federal Deployment Efforts to Remove Duplicative Spending. According to the GAO, there are currently over 130 programs directed towards expanding connectivity managed by 15 different agencies. Coordinating these efforts will improve accountability and reduce the likelihood of redundant spending.

FCC

Complete the 5G Fund

A well-timed 5G Fund will be effective in leveraging the BEAD infrastructure to finish the job of mobility everywhere, particularly in those areas that are uneconomic to serve.

The FCC should continue to update its maps to avoid overbuilding and look first to make use of existing infrastructure for colocation in order to build quickly and maximize limited federal funds.

CREATE A SPECTRUM PIPELINE TO FUEL TOMORROW'S WIRELESS NEEDS

“To dominate in next-generation wireless technologies, stay ahead of our adversaries, and advance strong economic growth, the U.S. must create a pipeline to expand commercial access to mid-band spectrum.



Sen. Ted Cruz

Priority: Restore FCC Auction Authority and Create a Spectrum Pipeline

Spectrum is invisible infrastructure, and our wireless networks cannot exist without it. Today, there is no new dedicated spectrum in the pipeline, which will choke our ability to evolve and deploy the wireless possibilities of tomorrow. Fortunately, plans already exist for how to make new commercial spectrum available. We've done our homework, now it's time to execute.

CONGRESS:

Restore FCC Spectrum Authority: It has been nearly two years since the FCC has even had the ability to auction off spectrum. Congress must restore spectrum authority immediately.

Reintroduce and Pass the Spectrum Pipeline Act of 2024: [This bill](#) (introduced in 2024 by Senators Thune, Cruz, and Blackburn) calls for NTIA, aided by the FCC, to identify at least 2500 MHz of government spectrum between 1.3-13.2 GHz for reallocation to non-Federal or shared Federal and non-Federal use. Importantly, the bill calls for dedicating at least half of this allocation to full-power commercial licensed use cases.

NTIA

Accelerate the National Spectrum Strategy: NTIA has laid out a plan to study multiple critical spectrum bands. We need to move beyond studies and get to solutions that meet industry needs while respecting critical government functions.

Advocate for the American Wireless Consumer: There are 558 million wireless connections in the US—more than 1.6 wireless connections for every American—according to recent CTIA data. And those connections continue to deliver more data to power more aspects of our everyday lives, with Ericsson predicting data demands to double over the next five years. Government spectrum use is important, but NTIA must advocate to make sure that the 98% of Americans that use wireless to power nearly every aspect of their lives today will have enough spectrum to meet the needs of tomorrow.

**CREATE A
SPECTRUM
PIPELINE TO FUEL
TOMORROW'S
WIRELESS NEEDS**



Priority: Restore FCC Auction Authority and Create a Spectrum Pipeline

NTIA

Encourage efficient utilization of spectrum by federal users, including the Department of Defense.

Critically examine federal spectrum holdings, including in the lower 3 GHz and 7-8 GHz bands, to identify bands for commercial use.

FCC

Lead The Charge: The FCC is the nation's lead agency for promoting the commercial and public use of spectrum; it should be actively involved in consulting with NTIA to make recommendations on the best processes for bringing commercial spectrum online.

Stay Vigilant: The FCC must be prepared for when the spectrum logjam breaks. This means it must have the people and systems in place to quickly bring spectrum to auction.

**MODERNIZE AND
STREAMLINE
INEFFICIENT
FEDERAL
GOVERNMENT
PRACTICES AND
TECHNOLOGIES**



Priority: Prioritize Federal IT Infrastructure Modernization

Information technology across the federal government lags behind the private sector and often cannot keep pace with the speed at which industry moves. The new Administration should prioritize improving the physical systems the industry and the federal government rely on to comply with rules and removing or streamlining unnecessary requirements. Targeted investments in systems, processes, and resources will have outsized effects in reducing backlogs and facilitating deployment.

FAA

Complete the Modernized Obstruction Evaluation (Modernized OE) Upgrade: Wireless infrastructure providers must coordinate with the FAA on numerous deployments that could impact aviation. The FAA has long been testing an upgrade to its IT infrastructure that enables such coordination—now is the time to finish the job and bring it online.

FCC

Modernize ULS and ASR: The FCC relies on significantly outdated technology for its Universal Licensing System, its umbrella system for tracking wireless licenses. This failure to modernize delays deployments for all kinds of communications infrastructure, including wireless infrastructure deployments relying on the Antenna Structure Registration database. Updating these systems alone would significantly speed the pace of wireless deployments and reduce unnecessary deployment costs.



Priority: Streamline Processes to Create a Safe and Efficient Siting System

FAA

Add C-Band and 600 MHz Frequencies to the “Colo Void” List:

Wireless infrastructure providers must apply for deployments using certain spectrum frequencies with the FAA to ensure aviation safety. Yet we know that certain bands do not require the same scrutiny, either because they are not adjacent to aviation use (600 MHz) or have existing aviation safety mitigation measures (C-Band). Adding wireless deployments in the 600 MHz and C-Band to the “colo void” list of frequencies that are pre-approved for deployment will significantly speed the vast majority of today’s wireless network deployments, freeing them from unnecessary review that is inefficient for both the applicant and the FAA’s own resources, without jeopardizing safety.

Consider Updating Legacy Lighting Requirements: The world of aviation continues to change, increasingly reliant on technology and many giving way to unmanned aircraft. With the FAA tasked to deliver an updated computer database of tower obstruction coordinates, the FAA should simultaneously consider whether its current lighting standards, which are stricter than global ICAO guidelines, are still apt. Reducing lighting requirements would lessen light pollution, improve safety for tower climbers that install, replace, and maintain equipment, and protect migratory birds that are vulnerable to excess lighting.

FISH AND WILDLIFE

Revert Back to the 2020 Migratory Bird Treaty Act Rules: The Trump Administration should reverse current policy, which declares that business activities that may incidentally impact migratory birds are prohibited under the Migratory Birds Treaty Act (MBTA). This change significantly expands the scope of liability under the MBTA. The Fish and Wildlife Service (FWS) should revert to the initial Trump Administration’s interpretation of the MBTA from 2020.

Allow for Non-Disruptive Ground Work: At a minimum, FWS should clarify that the potential of nesting activity in an area does not preclude any commercial activity in that area, including work on the ground that is not reasonably likely to disrupt birds.

INVEST IN BROADBAND WORKFORCE DEVELOPMENT FOR AMERICA'S COMMUNITIES

“Establishing partnerships as well as initiating and administrating education and training that prepares individuals to be effective across this spectrum of jobs can take between 9 months to 1 year. NTIA encourages grantees to act now to ensure workers are on board and trained so that BEAD deployment remains on track.”

Ramping Up the BEAD Workforce, NTIA

Priority: Support Apprenticeship and Broadband Sector Partnerships to Quickly Implement Workforce Development Programs

The nation's broadband networks are built through the labor of hard-working Americans. With BEAD funding soon to deploy and private industry continuing to invest heavily in our nation's broadband and wireless infrastructure, we will need more broadband workers than ever before. That is why it is critical to invest in workforce training today, so when the funds arrive in communities the networks can be built quickly, reliably, and safely.

Advance Apprenticeships: WIA stands prepared to ensure our human infrastructure is ready: our Department of Labor-recognized Telecommunications Industry Registered Apprenticeship Program (TIRAP) has trained over 6,000 apprentices to date with our 107 employer partners coast-to-coast. The Department of Labor under Republican and Democrat Administrations has supported registered apprenticeship programs like TIRAP; it should continue to do so.

Invest in Intermediaries: Consistent with the [2024 RNC platform](#), WIA believes in “education to prepare students for great jobs and careers, supporting project-based learning and schools that offer meaningful work experience . . . and fund[ing] proven career training programs.” Existing, successful programs utilizing competency-based training are crucial to give those looking to enter the workforce, reskill, or return to civilian work after leaving the military the practical skills needed to enter this thriving industry. With WIA's track record as an industry intermediary, we look forward to building our partnerships with universities and community colleges to prepare the next generation of workers for well-paid, in-demand careers.

Spotlight Successful States: The Trump Administration should build off the recent work of NTIA to [encourage states](#) to invest in workforce development with their BEAD funding allocations. NTIA has highlighted WIA's work with the state of Ohio and our partnership with The Ohio State University and other two- and four-year colleges and technical schools throughout the state as an example for other states to learn from and emulate. This model can be replicated throughout the country given its proven results and success for both industry employers and apprentices alike.