



Wireless
Infrastructure
Association

November 14, 2025

Arielle Roth

Assistant Secretary of Commerce for Communications and Information
National Telecommunications and Information Administration
1401 Constitution Avenue, N.W.
Washington, DC 20330

Dear Administrator Roth,

You and the Trump Administration have worked diligently to improve the BEAD deployment process. The results of the “Benefit of the Bargain” round are paying off, with a technology-neutral approach that has reportedly produced \$20 billion in savings. On behalf of the Wireless Infrastructure Association (“WIA”), representing tower companies, wireless carriers, and the myriad of companies that support the deployment of wireless infrastructure, I write to share WIA’s ideas for how to best invest the remaining funds on additional broadband deployment and to offer suggestions for what types of permitting commitments could be meaningful for states to improve the deployment process.

WIA’s longstanding position remains that the best use of any unspent fixed connectivity funds is to invest in areas lacking mobile broadband service. Americans living in or travelling to remote communities with no service should also receive the benefits of the BEAD program. Thanks to your leadership, this goal seems very achievable, while still leaving extra funding available for other NTIA priorities supportive of broadband deployment, including workforce development.¹

With respect to permitting, WIA was encouraged by your recent statements citing NTIA’s work to improve federal permitting but also recognizing that “states need to match that urgency” and that NTIA will therefore be requiring BEAD participants to commit to streamlining processing and minimizing permitting-related costs.² You also suggested using BEAD non-deployment funds to advance permitting reform, which could be money well spent to ensure BEAD projects can get moving and enable connectivity.

Use “Non-Deployment” Funds to Drive Infrastructure, Investment, and Jobs

With nearly \$20 billion saved from the Benefit of the Bargain round, NTIA and the Trump Administration should invest in wireless infrastructure to solve mobile connectivity gaps in rural areas

¹ See Letter from Patrick R. Halley, President and CEO, WIA, to Hon. Howard Lutnick, Secretary, Dept. of Commerce (Mar. 14, 2025).

² *Remarks of Assistant Secretary Arielle Roth at the Hudson Institute* (Oct. 28, 2025), <https://www.ntia.gov/speech/testimony/2025/remarks-assistant-secretary-arielle-roth-hudson-institute>.

where it has been uneconomic to deploy mobile wireless service. Consumers rely on their mobile devices for service, whether on the road or, increasingly, at home.³ Leveraging the fiber already being deployed for BEAD as backhaul to efficiently connect Americans from coast-to-coast would drive significant efficiencies in connectivity. Some industry estimates suggest we could reach 99% population coverage with high-speed mobile broadband service for approximately \$8 billion. This can easily be achieved with the BEAD savings already announced by NTIA, in turn reducing the need for efforts like the FCC’s proposed 5G Fund (which projected spending \$9 billion to accomplish the same task using high-cost Universal Service Fund (“USF”) dollars). Allowing states to fill their coverage gaps with this funding, as many states have previously planned to do,⁴ will truly give the “Benefit of the Bargain” to taxpayers.

At the same time, additional deployment also will benefit the American worker. President Trump has admirably set a goal of one million registered apprentices.⁵ The BEAD program should be a major contributor to the President’s goal of a well-trained workforce built for the AI future, as the industry will require well-trained workers to deploy and eventually maintain BEAD-funded networks across the country. Workforce development has always been an eligible use for BEAD as 41 states and Washington DC have identified workforce challenges as a risk in their BEAD plans.⁶ With state deployments rapidly approaching, NTIA should widely promote proven solutions, such as workforce intermediary and registered apprenticeship programs, that will allow for career development and turn today’s BEAD deployment into long-term, well-paying careers.

A Framework for State Permitting Success

WIA has found that many state and local jurisdictions process permitting applications efficiently, while many others seek guidance on how to better to do so. To address these questions, WIA developed a “5 Points of an Effective Permitting Checklist”⁷ as a reference for states and localities. We offer these

³ Risa Gelles-Watnick, *Americans’ Use of Mobile Technology and Home Broadband*, PEW RESEARCH CENTER (Jan. 31, 2024), <https://www.pewresearch.org/internet/2024/01/31/americans-use-of-mobile-technology-and-home-broadband/>.

⁴ See, e.g., *BEAD Cellular Infrastructure Program*, VA DEP’T OF HOUSING AND COMM. DEV., <https://www.dhcd.virginia.gov/sites/default/files/DocX/bead-nd/bead-nd-cellular-flyer.pdf> (last visited Nov. 14, 2025) (providing a roadmap for using BEAD non-deployment dollars to address the over 40,000 homes and 10,000 miles of roadways that lack baseline 4G service).

⁵ Exec. Order No. 14278, *Preparing Americans for High-Paying Skilled Trade Jobs and the Future*, 90 Fed. Reg. 17525 (Apr. 28, 2025).

⁶ See Colby Humphrey and Lexi West, *Demand for Broadband Workforce Expected to Rise to Meet BEAD Requirements*, PEW (Oct. 30, 2025), <https://www.pew.org/en/research-and-analysis/issue-briefs/2025/10/demand-for-broadband-workforce-expected-to-rise-to-meet-bead-requirements>.

⁷ WIA, *5 Points of an Effective Permitting Checklist*, <https://wia.org/5-point-of-an-effective-permitting-checklist> (last visited Nov. 14, 2025).

points (which are more fully developed in the linked document) as a helpful starting point for your discussions with states about committing to an efficient permitting framework:

1. Compliance with federal law (including FCC rules);
2. Objective application review criteria including an online application process;
3. Clear, workable design standards;
4. Community participation in developing the permitting framework; and
5. A fair and proportional fee schedule.

This checklist would be a strong starting point for any permitting commitments conversations NTIA has with states receiving BEAD funding as they combine to ensure a predictable, proportionate and transparent permitting process.

There are other examples worth considering as well. WIA appreciates the work of States' Broadband Ready Community programs, which vary from state to state but typically include the state certifying that a municipality is "broadband ready" by following certain requirements, often including enacting the state's model ordinance for permitting, creating one central contact for all broadband-related issues, and adopting reasonable fee requirements. Georgia⁸ and Kansas⁹ have been leaders on Broadband Ready Communities, but several other states have adopted the program as well. Kansas is a great example to point to, with straightforward requirements:

1. Single permitting office point of contact;
2. Application review period of 30 days;
3. Use of electronic application filing systems;
4. Use of reasonable fees.

Consistent with your recent remarks about how to effectively spend non-deployment funding to improve permitting processes, some states have already shown how they would use funding to address specific permitting issues, and this localized approach could also be productive. For example, Maine noted in their Volume II submission that the state's rural population and terrain can lead to unpredictable

⁸ See *Resources*, GA BROADBAND PROGRAM, <https://broadband.georgia.gov/resources> (last visited Nov. 7, 2025) (providing a model ordinance for localities to adopt which contains a streamlined permitting process).

⁹ See *Kansas Broadband Ready Communities*, <https://www.kansascommerce.gov/program/challenge/broadband-ready-communities> (last visited Nov. 7, 2025) (outlining how jurisdictions can limit "community barriers to broadband infrastructure projects").

cost and time delays for permitting, and planned to allocate \$400,000 of their non-deployment funding to the Maine Department of Environmental Protection to “coordinate, track and accelerate applications.”¹⁰ Michigan’s Volume II included a proposal for the state broadband office to on-board staff or employ contractors to ensure BEAD-related permits “do not experience unnecessary roadblocks to completion” including identifying problematic types of geography and types of permits that were delaying deployment and working with local governments to address these challenges head on.¹¹ States have been in this process for years now, and are likely very familiar with the roadblocks that have resulted in lack of coverage. NTIA should consider how additional funding would allow them to utilize their expertise and encourage them to suggest how they can best address broadband permitting issues.

Thank you again for your continued efforts to ensure every American is connected. WIA stands ready to work with you on these and other ideas you may have to ensure the BEAD process proceeds as effectively as possible.

Respectfully submitted,



Patrick Halley
President and CEO

WIA – The Wireless Infrastructure Association

2111 Wilson Blvd., Suite 210
Arlington, VA 22201
800.759.0300

¹⁰ *State of Maine BEAD Initial Proposal, Vol. 2*, pg. 45, ME CONNECTIVITY AUTH. (approved June 2024), <https://drive.google.com/file/d/18Zu9jPeUeTs3ahT5rIGckmLCnys3rfwL/view?pli=1>.

¹¹ *Broadband Equity, Access, and Deployment (BEAD) Initial Proposal Volume II – Final*, pg. 64, MI DEP’T OF LABOR AND ECON. OPP. (Aug. 27, 2024), <https://www.michigan.gov/leo/-/media/Project/Websites/leo/Documents/MIHI/BEAD/APPROVED-Michigan-Initial-Proposal-Volume-II.pdf>.