



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

Re: NTIA–2021– 0002

Good Morning,

On behalf of Tech Goes Home, a Boston-based nonprofit working to address digital inequity and empower individuals and families to take advantage of opportunities provided by the digital world, we are grateful for the invitation to submit these comments regarding NTIA's Bipartisan Infrastructure Law (BIL) implementation efforts.

The COVID-19 crisis has underscored the deep digital inequities facing our communities, and created an even more urgent need to advance comprehensive, sustainable solutions that will ensure equitable online access to school, work, healthcare, and other critical services. The \$65 billion included in the BIL to address broadband connectivity is an important signal of the Biden Administration's intent. However the ultimate impact of this funding depends on how it is implemented.

Among the many questions that NTIA poses, we would highlight a few that deserve particular attention:

What are the most critical steps NTIA can take to ensure that the Bipartisan Infrastructure Law's broadband programs meet their goals with respect to access, adoption, affordability, digital equity, and digital inclusion?

Community leadership is essential to achieving the goals of the BIL's broadband programs. Program implementation should not happen TO communities, but rather THROUGH communities (and community-based organizations).

NTIA asks both what kinds of technical assistance would be beneficial to supporting the implementation of the BIL's broadband programs, and how subgrantee award processes should be structured. In both cases, NTIA should put community engagement at the center. NTIA should provide states, municipalities, and subgrantees with robust technical assistance regarding effective, sustainable community engagement methods to ensure that community voices are not only at the table during implementation discussions but are actively leading and co-creating solutions. Likewise, NTIA should ensure that subgrantee awards are contingent on



clear, strong, and consistent community engagement planning, and that subgrantees are effectively held accountable for their community engagement efforts.

Transparency and public accountability are critical to the success of the Bipartisan Infrastructure Law’s broadband programs. What types of data should NTIA require funding recipients to collect and maintain to facilitate the assessment of the Bipartisan Infrastructure Law programs’ impact, evaluate targets, promote accountability, and/or coordinate with other federal and state programs?

First, a wealth of valuable data already exists related to broadband access and disparities between different states and communities. NTIA should explicitly encourage states, municipalities, and subgrantees to effectively use this data in their planning process, including by providing technical assistance related to accessing current data and making relevant data a key consideration in funding decisions.

Throughout implementation and program life, comprehensive, accessible data will be critical for assessing impact and guiding programmatic strategy. NTIA should prioritize robust data collection and public reporting related to broadband access - disaggregated by socioeconomic status, age, race and ethnicity, gender, disability status, and geography, to ensure that future programmatic decisions are grounded in data rather than prevailing (and often outdated) understandings of broadband access.

In addition, NTIA should require the collection and public reporting of relevant broadband data, including cost, average speed (along with the lowest speed), and reliability, again disaggregated by socioeconomic status, age, race and ethnicity, gender, disability status, and geography, to ensure that overall implementation statistics are not used to paper over continued disparities.

What are the best practices NTIA should require of states in building Digital Equity Plans? What are the most effective digital equity and adoption interventions states should include in their digital equity plans and what outcomes exist for those solutions?

In setting requirements for Digital Equity Planning Grants, NTIA should prioritize the explicit inclusion of diverse community partners in the planning process alongside the grant applicant.

In addition, NTIA should require that all planning grant applications reflect the three legs of the digital equity stool: internet connectivity, devices, and digital training. To effectively advance digital equity sustainably, investments in broadband infrastructure must be matched by an equal focus on both access to devices (not including phones, and more than one connected device in households with children, elders, or more than one working adult) and culturally-competent digital skills training that provides individuals and families with the requisite skills and resources



they need to effectively find employment, participate in school, connect with loved ones, and access critical resources online.

We appreciate the opportunity to comment and NTIA's intentionality in seeking out public input on the implementation of the BIL broadband programs. It's our sincere hope that that focus on public engagement will be reflected in the requirements for distribution and implementation of these critical Federal resources. With communities as leaders, and robust requirements for both data collection and comprehensive solutions, we have the opportunity to make significant progress towards ending digital inequity. We also look forward to offering additional comment on the implementation of the State Digital Equity Capacity Grant Program and Digital Equity Competitive Grant Programs.

Please do not hesitate to reach out to us at dan@techgoeshome.org and/or theo@techgoeshome.org if we can provide any resources or answer any outstanding questions.

Sincerely,

Dan Noyes and Theodora Hanna, Co-CEOs
Tech Goes Home