



Washington, D.C. Feb 2, 2022

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

NTIA Infrastructure Investment and Jobs Act Implementation on Broadband (Docket NTIA-2021-0002)

Dear Mr. Davison

The National Family Farm Coalition (NFFC) is pleased to comment on the Infrastructure Investment and Jobs Act Implementation on Broadband. For quite some time members of the National Family Farm Coalition have raised the alarming discrimination that rural communities suffer with the lack of access to reliable, affordable, and equal internet connectivity.

NFFC is an alliance of grassroots farmer- and advocate-led groups across 42 states, representing the rights and interests of independent family farmers, ranchers, and fisherfolk in Washington, DC. NFFC's 32 state, national, and regional farm and rural organizations are bound by a common belief that communities have the right to determine how their food is grown and harvested; that everyone in the food system should receive fair prices or wages; that all producers have equitable access to credit, land, seeds, water, markets, and other resources; and, that our food and agriculture policies must support sustainable farming, ranching, and fishing practices.

We welcome the Bipartisan Infrastructure Law which was way overdue, and hope that our comments and those coming out of rural communities are seriously considered. We will address some of the questions to bring reliable, affordable, high-speed broadband to all Americans.

1. What are the most important 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?

As reported by the Washington Post, the Federal Communication Commission Internet services maps are wrong because they are based on census data and not on actual geographic coverage (WSP, 2021). This has constantly frustrated and disincentivized consumers because it restricts access and adoption; in addition, it encourages free providers to raise fees. For example, one has testimony of rural residents who to get access must pay additional fees to have services, and others that abandoned that option altogether.



We urgently call on the NTIA and the FCC to invest part of the allocated budget to address these problems as an initial step for proper implementation. Without good foundations, the rest of the infrastructure will crumble.

2. How best can NTIA ensure that all voices and perspectives are heard and brought to bear on questions relating to the Bipartisan Infrastructure Law's broadband programs?

One lesson from the COVID-19 pandemic is the recognition that remote learning is significantly disparate for rural communities with poor connectivity, urban areas with large sectors of disadvantaged families, and urban areas with middle- and high-income families. Parking lots at fast food restaurants and libraries are not locations to send your children to school (The Guardian, 2021). A recent analysis estimates that 12 million students lack internet services or make do with a patchwork of short-term fixes to participate in remote learning (Ali, et al. 2021). We recommend that all initiatives offered to address these issues should partner with the school systems; they learned a lot about the many issues concerning broadband services. Because school staff are overwhelmed by a wide range of issues, we suggest that these consultations happen in the summer and with incentives for participants.

Regarding the specific needs of small farmers, ranchers, and fisherfolks, we suggest that land grant universities, HBCUs, and State Departments of Agriculture should implement outreach programs to correct some of the internet mapping problems described above to assess the needs and capabilities of food producers. Finally, there are many small rural towns that have made the effort to provide hot spots to residents, and they should also be consulted. For example, Fellsmere, Florida installed Wi-Fi services outside their town hall.

3. What types of data should NTIA require funding recipients to collect and maintain to facilitate assessment of the Bipartisan Infrastructure Law programs' impact, evaluate targets, promote accountability, and/or coordinate with other federal and state programs? Are there existing data collection processes or templates that could be used as a model? How should this information be reported and analyzed, and what standards, if any, should NTIA, grant recipients, and/or sub-grantees apply in determining whether funds are being used lawfully and effectively?

Grantees should ensure that their services are affordable and equitable; they should collect and report accurate map coverages, costs and fees of services, and customer satisfaction feedback. As suggested above, NTIA should partner with academic institutions to help evaluate the effectiveness and even lawfulness of these projects. We can foresee many students developing their research and professional services with real world experiences.



4. How should NTIA and grant recipients verify that funding is used in a way that complements other federal and state broadband programs?

We expect that NTIA, FCC, U.S. Department of the Treasury, U.S. Department of Agriculture, and States form a task force to coordinate their efforts.

5. In implementing the Bipartisan Infrastructure Law's programs, NTIA will offer technical assistance to states, localities, prospective sub-grantees, and other interested parties. What kinds of technical assistance would be most valuable? How might technical assistance evolve over the duration of the grant program implementation?

The kind of support that applicants and grant recipients need will differ depending on the resources they have. Small and medium providers, cooperatives, non-profits, and municipalities should receive significantly more support than electric utilities and large for-profit companies who already have capabilities to succeed. Following one of the principles of the current administration: competition is healthy and the most diverse providers are the best services we should expect.

6. The Bipartisan Infrastructure Law requires states and territories to competitively select subgrantees to deploy broadband, carry out digital equity programs, and accomplish other tasks. How should NTIA assess a particular state or territory's subgrant award process?

Proposals should be evaluated, including background checks of applicants, and reports of abuse by clients and workers.

7. NTIA views the participation of a variety of provider types as important to achieving the overall goals of the Bipartisan Infrastructure Law broadband programs. How can NTIA ensure that all potential subrecipients, including small and medium providers, cooperatives, non-profits, municipalities, electric utilities, and larger for-profit companies alike have meaningful and robust opportunities to partner and compete for funding under the programs?

Besides referring to the answer in question five, NTIA should identify partnership opportunities among applicants and afterward host grantee meetings to share experiences.

8. States and regions across the country face a variety of barriers to achieving the goal of universal, affordable, reliable, high-speed broadband and broadband needs, which vary from place to place. These challenges range from economic and financial circumstances to unique geographic conditions, topologies, or other challenges that will impact the likelihood



of success of this program. In implementing the Bipartisan Infrastructure Law's broadband programs, how can NTIA best address such circumstances?

Human and natural disasters have taught us that broadband access is urgently needed across the country. We also have known for years that for-profit companies are not interested in providing services to isolated communities that will not compensate them or provide a profit for their investment. Small and medium providers, cooperatives, non-profits, and municipalities should be encouraged to fill this gap.

9. Several Bipartisan Infrastructure Law broadband programs provide that, absent a waiver, a grant or subgrant recipient must contribute its own funding, or funding obtained from a non-federal source, to “match” funding provided by the BIL program. Under what circumstances, if any, should NTIA agree to waive these matching fund requirements, and what criteria should it assess (in accordance with any criteria established by the statute) when considering waiver requests?

In locations where traditional providers had refused to provide affordable access. Small and medium providers, cooperatives, non-profits, municipalities who are willing to fill accessibility gaps.

10. N/A

11. What federal policy tools can NTIA apply to help ensure that broadband funding is deployed in a way that maximizes the creation of good paying jobs and that women and people of color have full opportunity to secure those jobs.

Traditional recruitment tactics in rural communities should copy those in urban locations where job fairs and hiring advertising take place. In addition, NTIA should encourage employer-sponsored green cards or naturalization. While this is beyond the scope of these comments, we stand for comprehensive immigration reform and the end of any labor discrimination.

Finally, we welcome NTIA Broadband Equity, Access and Deployment (BEAD) Program. We only hope that some safeguards are in place to ensure that such funds are not sequestered or utilized by partisan politics. Again, we thank you for this opportunity and we look forward to any feedback that you may have.

Antonio Tovar PhD
Policy Associate - National Family Farm Coalition
antonio@nffc.net / www.nffc.net



References

Ali, T., Chandra, S., Cherukumilli, S., Fazlullah, A., Galicia, E., Hill, H., McAlpine, N., McBride, L., Vaduganathan, N., Weiss, D., Wu, M. (2021). Looking back, looking forward: What it will take to permanently close the K–12 digital divide. San Francisco, CA: Common Sense Media.

https://www.common Sense Media.org/sites/default/files/uploads/pdfs/final_-_what_it_will_take_to_permanently_close_the_k-12_digital_divide_vfeb3.pdf

The Guardian,

Attending school at a fast-food spot. March 15, 2021 <https://www.theguardian.com/us-news/2021/mar/15/us-students-online-access-internet-pandemic-virtual-learning>

Washington Post, Biden’s ambitious broadband funding has a key impediment: an outdated map of who needs it, December 14, 2021

<https://www.washingtonpost.com/technology/2021/12/14/bidens-ambitious-broadband-funding-has-key-impediment-an-outdated-map-who-needs-it/>