

American Connection Project Policy Coalition Implementation Principles

The American Connection Project Policy Coalition has long advocated for robust investment in broadband infrastructure, better mapping, stronger state and federal coordination on broadband deployment. We were pleased to support passage of the *Infrastructure Investment and Jobs Act*.

As implementation of the *Infrastructure Investment and Jobs Act* is addressed, we want to be a resource to help ensure that this historic investment is implemented efficiently and closes the digital divide in communities across the country. When the COVID-19 pandemic began, we responded swiftly. As partners we worked together to offer free, public Wi-Fi access to local communities as a short-term solution for broadband access. Other organizations joined us in this effort, and we are now reaching over 3,000 locations in 49 states, easily accessed with a searchable Wi-Fi map. It's a short-term solution, but one that makes all the difference if we can help even one family – but it is not a long-term solution.

Infrastructure investment will help solve this problem long term if the funds reach those most in need. What we have found is that many small communities do not have the capacity to leverage the opportunities, funding, and technical assistance to solve their digital connectivity challenges. That's why we launched the [American Connection Corps](#). In 2021, we announced a new, boots-on-the-ground effort to boost local internet connectivity called the American Connection Corps, which has been led in conjunction with Lead for America and is funded through the support of 20 partners. This program has deployed 50 Fellows to partner with local public-serving institutions in their hometowns focused specifically on projects related to connectivity and digital inclusion.

As we shift to implementation of the *Infrastructure Investment and Jobs Act*, it is important that we work together to meet the needs of those struggling without access reliable, affordable high-speed broadband. **Below we have outlined key concepts for implementation:**

General Implementation Principles

1.) Maps should be developed as quickly as possible while also maintaining accuracy.

Accuracy means collecting metrics related to quality of service such as download and upload speeds and latency to determine the areas of greatest need.

A viable challenge process and crowdsourcing program should also be included, and accurate maps already created in certain states should be incorporated as well. The ACP coalition members stand ready to partner with the FCC to promote and share the new crowdsourcing program.

2.) Affordability and digital inclusion should be at the forefront of the implementation discussion. We support state and federal funding to provide needed assistance to low-income communities and consumers to make broadband service more affordable and to

promote broadband adoption. With this goal in mind, we encourage the FCC to continue to improve access to the newly established Affordable Connectivity Program while also ensuring the program is efficiently managed.

- 3.) **Communication, engagement, transparency, and accountability are critical to the successful implementation and deployment of the Infrastructure Investment and Jobs Act.** We support the federal government requiring communication, engagement and transparency plans be developed as part of the state proposals. We further encourage Governors to develop robust engagement strategies in their states to ensure that all stakeholders and communities are well informed of opportunities, receive clear guidance on how to apply and that granting processes are efficient while also being accountable for results.

Implementation Principles for States and Federal Agencies

- 1.) **We encourage federal agencies and Governors to collaborate to ensure successful deployment of the *Infrastructure Investment and Jobs Act*. Leadership and coordination at the executive branch level in the federal government should position our country as a technology leader.** This will ensure our economic competitiveness and maintain strong national security. In support of that effort, leadership and coordination should ensure that both federal and state investments in technology infrastructure are deployed in the most efficient and effective ways to address the digital divide.
- 2.) **Federal dollars directed toward retail broadband deployment should continue to be coordinated with existing federal broadband programs to prevent duplication of scarce federal resources.** For example, the federal government should generally avoid funding two different retail broadband networks operated by two different providers via two different programs to the same location. However, if a provider receiving support is not meeting its obligations, or if the federal program does not require adequate service, federal funds should be open to another provider to serve as a replacement to ensure robust and reliable service.
- 3.) **Federal and state agencies should also create transparency and accountability measures to ensure that those seeking funding for the deployment of networks are vetted.** The process established should verify those seeking funds are indeed capable of delivering at the performance levels and services promised and allow for grantees to be challenged.
- 4.) **Federal and state agencies should provide flexibility to providers when applying build-out deadlines if the delays are due to matters outside of their control.** Considering supply chain, cost pressures and workforce challenges in the telecom sector, this is a necessary step towards broadband deployment.
- 5.) **We also encourage all states to continue to support, or establish for the first time, a permanent state broadband office.** These offices can ensure the Infrastructure Investment and Jobs Act (IIJA) funding is administered as wisely and efficiently as possible.

Implementation Principles for Federal Agency Partners

- 1.) **We encourage the National Telecommunications and Information Administration (NTIA) to support state and federal funding that prioritizes deployment and sustainability of scalable networks.** These networks should deliver quality high-speed broadband services

capable of meeting today's and tomorrow's communications needs across America as required by the law, while also encouraging such networks to be built in a timely manner.

- 2.) **We encourage NTIA to ensure that grants allow for all communities to deploy fiber, but also the technologies that power the backend infrastructure.** These investments should allow for the capability to extend internet connections beyond the end of fiber cables.
- 3.) **The NTIA should also prioritize unserved locations, and then underserved areas as well as community serving anchor institutions with limited speeds.** Specifically, funding should be prioritized in communities with the greatest number of disparities and challenges such as unserved, high-poverty areas and unserved tribal communities.
- 4.) **The coalition encourages the NTIA, FCC, and USDA to allow new funding made available through the Infrastructure Investment and Jobs Act (IIJA) to work in concert with existing state funding.** Many states have a long history of utilizing state funds to deploy broadband networks. These funds should serve as a complimentary source of funding to the more-robust federal funding made available through the IIJA. For example, states should be allowed to use existing state funds already available to them towards the required 'matching' funds needed for the new NTIA BEAD program.
- 5.) **We encourage NTIA and the Administration to ensure consistent application of waiver processes across state grantees and projects** This includes streamlining the applications through the use of IT product category waivers.
- 6.) **Cybersecurity is an important national security issue.** The coalition encourages the Administration to incorporate baseline guidance for grantees and states to ensure that broadband infrastructure deployments meet basic NSA cybersecurity criteria to mitigate and prevent cyber risks to our communication networks and consumers.

About the American Connection Project Broadband Coalition

The American Connection Project Broadband Coalition represents more than 175 companies and organizations from multiple economic sectors who are working together to bring high-speed internet access to all U.S. households. The Coalition understands that digital connectivity is not a luxury, but rather is a lifeline for education, health, modern food production, and economic growth. Drawing from their cross-sector expertise and experience in rural communities, the members are making private investments to bridge the digital divide while advocating at the state and federal levels for permanent solutions and efficient deployment of broadband infrastructure investments.

More information can be found at americanconnectionproject.com or by contacting Matthew Wohlman at mwohlman@landolakes.com or Autumn Price at alveazey@landolakes.com.