



**National Society of
Professional Engineers®**

Ms. Anna Gomez

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

Mr. David J. Villano

Assistant Administrator for Telecommunications
U.S. Department of Agriculture
STOP 1590
1400 Independence Avenue, SW
Room 5151
Washington, DC 20250-1590

April 13, 2009

Subject: Broadband Technology Opportunities Program
Response to Joint NTIA/RUS Request for Information
Docket No. 090309298-9299-01

Dear Deputy Assistant Secretary Gomez and Assistant Administrator Villano:

The National Society of Professional Engineers (NSPE) applauds the American Recovery and Reinvestment Act's (ARRA) funding for modernizing and strengthening our nation's infrastructure. NSPE is the recognized voice of licensed professional engineers, representing 45,000 individual members.

NSPE offers the following comments in response to the Request for Information (RFI)¹:

The National Telecommunications and Information Administration (NTIA) and the USDA's Rural Utilities Service (RUS) have received a combined \$7 billion for broadband programs from the ARRA. The National Society of Professional Engineers recommends that NTIA and RUS require that licensed professional engineers be used

¹ NSPE specifically addresses NTIA questions 12.a. "What specific programmatic elements should both agencies adopt to ensure that grant funds are utilized in the most effective and efficient manner?", 14.a. "What measurements can be used to determine whether an individual proposal has successfully complied with the statutory obligations and project timelines?", and 15. "Please provide comment on any other issues that NTIA should consider in creating BTOP within the confines of the statutory structure established by the Act.", and RUS question 2. "In what ways can RUS and NTIA best align their Recovery Act broadband activities to make the most efficient and effective use of the Recovery Act broadband funds?"



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to perform engineering services for the ARRA grantees or borrowers and to certify that projects funded with ARRA monies meet the intent of the program. Current RUS regulations state that borrowers must use an independent, state-licensed, and properly insured professional engineer or obtain RUS certification of a member of the borrower's staff. We believe NTIA should implement the same standards, and that these standards should apply to all ARRA-funded projects. Although ARRA funding is time-sensitive, public health and safety cannot be compromised.

We urge NTIA and RUS to require that professional engineers be used in ARRA-funded broadband programs. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Lawrence A. Jacobson".

Lawrence A. Jacobson
Executive Director