



September 4, 2024

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

**Re: Comments in the matter of the Broadband Equity, Access, and Deployment (BEAD) Program:
Alternative Broadband Technology Policy Notice**

Dear NTIA:

On behalf of NATE: The Communications Infrastructure Contractors Association (www.natehome), we are submitting for the record comments concerning the agency's proposed new guidance to help clarify when states and territories can fund "alternative technologies" through the Broadband Equity Access and Deployment (BEAD) program in the hardest-to-reach locations.

NATE is a non-profit trade association dedicated to providing a unified voice for companies in the diverse tower, broadband, and communications infrastructure industries. Today, the Association represents more than 1,050 member companies that construct, service or maintain hundreds of thousands of communications towers and next generation networks throughout the United States and 12 other countries.

We are proud of the efforts being undertaken by our member companies and their tower technicians – the men and women who climb and perform work on communications infrastructure – to help address such critical priorities as closing the digital divide, expanding broadband, promoting safety within our industry and developing and training a workforce capable of effectively managing the surging demand for next generation communication services.

We believe that deploying broadband funds effectively to connect all areas of the country must be technology neutral. Initially, there was a push for wireline (fiber only) connectivity, instead of supporting a variety of technologies, including wireless, which are crucial to closing the digital divide. We welcome this important proposal that will enable precious resources to be leveraged to achieve national broadband expansion goals, especially in rural and geographically challenging regions, in a cost-effective and efficient way.

This proposal is an important first step to recognize that additional technologies such as unlicensed wireless networks are an important part of the solution to bringing connectivity to all areas of the country.

It is vital to ensure that broadband deployment be technology neutral – incorporating both fiber and wireless technologies – because we must use the technology that fits the geography and topography of

each area and ensure that we are using taxpayer resources effectively and efficiently. We should consider the fact that in some areas, fiber technology can be deployed quickly, but in many instances wireless technology can deliver high-speed communications for a fraction of the time and cost.

In fact, even the Department of Commerce Office of the Inspector General (OIG) highlighted how the BEAD program must be technology neutral to fit the broadband needs of the different states and territories. The OIG warned that NTIA must relax the fiber preference and Extremely High-Cost threshold to take into consideration the limited availability of resources to support a fiber preference. Ignoring innovations in unlicensed fixed wireless and satellite technologies will make the BEAD program a 'deploy as much fiber as possible' program instead of the 'connect every American' program that Congress directed.¹

These findings reflect our own experience in the field where we have seen communities transformed by next generation connectivity through alternative technologies. These cost-effective approaches are also able to traverse hard-to-reach areas of our nation. NATE member companies stand ready to play their part in helping to close the digital divide.

Thank you for your consideration of NATE's views. We look forward to working with NTIA as implementation of the BEAD program progresses.

Sincerely,



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NATE President & CEO



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¹ <https://www.oversight.gov/report/DOC/Management-Alert-Challenges-Industry-Stakeholders-Face-Broadband-Deployment>