

Assistant Secretary of Commerce for Communications and Information Arielle Roth
National Telecommunications and Information Administration
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[Delivered via e-mail broadbandgrants@ntia.gov]

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Assistant Secretary Roth,

The [Blue Ridge Broadband Alliance](#) is a coalition dedicated to ensuring that Western North Carolinians have the devices, skills, and connectivity they need to thrive in an increasingly online world. We urge the National Telecommunications and Information Administration (NTIA) to follow the Infrastructure Investment and Jobs Act (IIJA) and disperse the full allocations of Broadband Equity, Access, and Deployment (BEAD) Program funds to states and territories, while retaining state flexibility in how those funds are used.

As leaders at the US Department of Commerce consider additional uses for funds to facilitate BEAD's goal, the Blue Ridge Broadband Alliance sees a need for robust investments in broadband adoption and affordability, infrastructure gap-filling where necessary, emergency communications resilience, and workforce development.

In the IIJA, Congress found that broadband is "essential to full participation in modern life" and that broadband's benefits "should be broadly enjoyed by all." That is the context in which the Broadband Equity, Access, and Deployment (BEAD) Program was created: Congress sought to address every facet of the digital divide and ensure that all people could actually benefit from this essential service—not simply have a network pass by their home.

We appreciated Secretary Lutnick's recent testimony before the Senate Appropriations Committee in which he not only touted states' ability to understand and address their unique needs, but also promised to make BEAD funds available "in alignment with the statute." The statute clearly allows states to use BEAD funds to promote broadband affordability and adoption and gives them substantial deference in program design.

We support the statutory intent of the BEAD funds to:

1. Deploy broadband networks to unserved and underserved areas;
2. Connect community anchor institutions;
3. Conduct data collection, broadband mapping, and planning;
4. Install internet and Wi-Fi infrastructure or provide reduced-cost broadband within multifamily residential buildings; and
5. Increase broadband adoption, including programs to provide affordable internet-capable devices.

In addition, Congress authorized the Assistant Secretary to determine additional uses of these funds to facilitate BEAD's goals. NTIA's current listening process provides an important opportunity to ensure that those determinations reflect both the statute and on-the-ground realities.

BEAD cannot be successful unless it addresses the primary causes of the digital divide: broadband infrastructure and adoption.

Congress expressly authorized states to promote broadband adoption, defined as the process by which an individual obtains high-quality internet service, digital skills, personal devices, and secure and convenient networks. Non-deployment funding is critical to support digital navigators, digital literacy programs, device distribution, outreach, and program administration. These investments are critical to ensure that newly deployed networks are fully utilized.

In Western North Carolina, internet adoption still lags behind the national average by [six percentage points](#). Without targeted adoption and affordability investments, new infrastructure alone will not close this gap.

Further, recent updates to the Federal Communications Commission's (FCC) broadband availability map have identified newly unserved and underserved locations that will not be connected through BEAD or other current funding programs. In North Carolina, more than 21,000 locations fall into this category. These locations were either not included in earlier versions of the FCC Fabric, experienced a change in reported availability, or areas where Rural Digital Opportunity Fund providers or other similar programs have defaulted.

Consistent with the statute and program guidelines, NTIA should permit states to use remaining BEAD dollars to address as many of these newly identified gaps as possible.

In 2024, Western North Carolina was ravaged by Hurricane Helene. The storm [destroyed](#) more than 1,700 miles of fiber optic cable, and more than 200,000 phone and internet customers lost connection. The scale of the disruption underscored an important lesson: deployment without resilience is insufficient.

To sustain progress in expanding high-speed internet access, we must ensure that our critical communications infrastructure is resilient, prepared for future natural disasters, and has redundancy to avoid communications blackouts. We urge NTIA to clarify that BEAD non-deployment may support resilience and redundancy measures consistent with the statute's goals. Ensuring network durability protects public safety, healthcare access, and emergency response capabilities.

Finally, for Western North Carolina, investment in AI workforce development is directly tied to long-term job creation and regional economic vitality. Recently, the [U.S. Department of Labor](#) (DOL) formally defined AI literacy as a core workforce competency—encompassing the ability to use, assess, and apply artificial intelligence technologies responsibly, with particular emphasis

on generative AI tools that are rapidly becoming embedded across occupational sectors. Targeted funding would enable community colleges, workforce boards, economic development organizations, and employer partners to build industry-aligned AI training pathways that support incumbent worker upskilling, entry-level career pipelines, and entrepreneurship. For rural and small-town communities in Western North Carolina, this is particularly critical: AI literacy can help small businesses increase productivity, expand into new markets, and operate more efficiently without relocating.

The Blue Ridge Broadband Alliance urges NTIA to follow the statute and release states' full BEAD allocations for use as Congress intended.

Thank you.

/s/ Sara Nichols
Blue Ridge Broadband Alliance

