



April 28, 2023

Via Electronic Submission

Ms. Angela Thi Bennett
Digital Equity Director
National Telecommunications and
Information Administration
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: Request for Comments, National Telecommunications and Information Administration; Digital Equity Act of 2021 (88 Fed. Reg. 13,101-13,106, March 1, 2023)

Dear Ms. Bennett:

The U.S. Chamber of Commerce appreciates the opportunity to submit comments on the National Telecommunications and Information Administration's ("NTIA") Request for Comments ("RFC") on implementation of the Digital Equity Act of 2021, and provides the following comments to ensure effective implementation.

Assessing State Digital Equity Plans

The State Digital Equity Planning Grant Program will assist states and territories in developing Digital Equity Plans. To ensure the effective development of these plans, the Chamber makes the following recommendations.

First, we agree that NTIA and state grant recipients should provide communities and community organizations with plain language resources to introduce and explain the digital equity initiative, which should include specific prompts for feedback from common community resources like schools, libraries, and state and local chambers of commerce.

Second, NTIA and states should utilize criteria including cost, resiliency, and long-term sustainability. For example, questions exist on the ability of communities to utilize the initiatives and resources awarded to the equity plans. It is unclear how they can use those resources to close gaps to improve the resiliency of communities, or the ability of programs to be maintained in the future. Criteria should also include specific outcomes in addressing poverty, educational opportunity, and access to services.

Third, in addition to technical assistance, NTIA should ensure this program is coordinated with existing federal programs across agencies to ensure the responsible use of taxpayer dollars, including through providing a comprehensive overview to states and territories of other relevant federally supported programs, tools, and other resources.

Implementation of the State Digital Equity Capacity Grant Program

As NTIA designs the State Digital Equity Capacity Grant Program, the Chamber recommends that NTIA should account for the following considerations. First, the program should include metrics and standards to assess access, affordability, and digital literacy to define the success of the program. These metrics should be consistent with the Infrastructure Investment and Jobs Act (“IIJA”), particularly as it relates to the definition of unserved as well as with the Federal Communication’s Affordable Connectivity Program.

Second, to maximize outcomes, states and territories should align implementation of this program with their implementation of the IIJA’s Broadband, Equity, Access, and Deployment (BEAD) program. These recommendations will ensure the alignment of the Digital Equity Act with other IIJA broadband programs to efficiently close the digital divide.

Conclusion

The Chamber thanks NTIA for considering our views on this RFC. If you have any questions, please reach out to Matt Furlow, Policy Director at the Chamber Technology Engagement Center (C_TEC) (mfurlow@uschamber.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'TK' with a long horizontal flourish extending to the right.

Tom Quaadman
Executive Vice President
Chamber Technology Engagement Center
U.S. Chamber of Commerce