



Evelyn Remaley Hasch
National Telecommunications and Information Administration
1401 Constitution Ave, NW
Washington, DC 20230

Dear Ms. Hasch,

Docket No. 220105-0002

Thank you for the opportunity to provide feedback on the National Telecommunications and Information Administration's (NTIA) plans for the implementation of the Bipartisan Infrastructure Law (BIL). We appreciate NTIA initiating a public comment period to ensure that all voices are heard and encourage NTIA to approach the implementation of BIL with the interests of today's students in mind.

Higher Learning Advocates (HLA) is a non-profit advocacy organization working to shift federal policy from higher education to higher learning—education and training beyond high school that leads to a degree, credential, or employment. With more students participating in higher education than ever before, we strive to strengthen the connection between federal policy and the needs of today's students, employers, and communities.

Today's students are postsecondary students who are also first-generation, parents, working adults, attending part-time, justice-involved, veterans, and more. They are more likely to be racially and economically diverse and attend classes on campus or online than postsecondary students who preceded them.

In response to NTIA's questions, HLA recommends the following:

2. Obtaining stakeholder input is critical to the success of this effort. How best can NTIA ensure that all voices and perspectives are heard and brought to bear on questions relating to the Bipartisan Infrastructure Law's broadband programs? Are there steps NTIA can and should take beyond those described above?

It is crucial that the voices of whom these plans intend to serve are heard. NTIA should directly engage with today's students and the institutions who serve them through surveys and focus groups to understand the challenges students face accessing broadband and to learn how NTIA can help ensure their broadband needs are met. We propose NTIA partner with institutions of higher education, particularly with community colleges, Historically Black Colleges and Universities, Tribal Colleges and Universities, minority serving institutions and other institutions with high percentages of students receiving Pell Grants, as well as organizations that directly support students who are eligible for this service.

14. NTIA is committed to ensuring that networks constructed using taxpayer funds are designed to provide robust and sustainable service at affordable prices over the long term. What criteria should NTIA require states to consider to ensure that projects will provide sustainable service, will best serve unserved and underserved communities, will provide accessible and affordable broadband in historically

disconnected communities, and will benefit from ongoing investment from the network provider over time?

Today's students need access to broadband in order to complete much of their schoolwork, both at home and at an institution of higher education. States and NTIA should cooperate to meet the needs of populations who require broadband and ensure access to broadband services for today's students. This includes making sure the proper infrastructure is in place to ensure access to broadband services anywhere in the country. Many rural communities currently do not have this infrastructure which makes it difficult if not impossible for today's students to access broadband services, even if they are offered at a steeply discounted price.

Affordability of broadband, accessibility of broadband, as well as flexibility in how broadband is accessed and where it is accessed, are critically important issues to today's students. While affordability matters to many, today's students need broadband that can be accessed flexibly through multiple devices without caps on how much data can be accessed through a hotspot or similar feature. In addition, today's students need to be able to access broadband at their home, their place of employment and at any institutions of higher education they attend. Taxpayer funds need to prioritize the development of broadband networks that include this flexibility and not those that just prioritize singular-location access.

18. The Bipartisan Infrastructure Law provides that BEAD funding can be used in a variety of specific ways, including the provision of service to unserved and underserved areas, connection of community anchor institutions, data collection, installation of service within multi-family residential buildings, and broadband adoption programs. The law also permits the Assistant Secretary to designate other eligible uses that facilitate the program's goals. What additional uses, if any, should NTIA deem eligible for BEAD funding?

Many institutions of higher education, particularly community colleges, Historically Black Colleges and Universities, Tribal Colleges and Universities and minority serving institutions, provide services for their students and members of the communities in which they are located. We encourage NTIA to fully recognize the importance of institutions of higher education as community anchor institutions as eligible recipients for BEAD funding. It is especially critical for today's students seeking an education to know the institution of higher education at which they are learning can not only provide them broadband access but also has the bandwidth in this access to use the internet effectively to access classes and complete coursework.

25. The Bipartisan Infrastructure Law includes historic investments in digital inclusion and digital equity, promising to bring all Americans the benefits of connectivity irrespective of age, income, race or ethnicity, sex, gender, disability status, veteran status, or any other characteristic. NTIA seeks to ensure that states use Digital Equity Planning Grants to their best effect. What are the best practices NTIA should require of states in building Digital Equity Plans? What are the most effective digital equity and adoption interventions states should include in their digital equity plans and what evidence of outcomes exists for those solutions?

In order to ensure equity in the development and implementation of Digital Equity Plans, NTIA should require states to engage with stakeholders who represent today's students, such as student-led organizations and college access organizations. In particular, the needs of working students who often have children themselves will be dramatically different from those seeking

broadband coverage simply at work or at home and should be considered in building Digital Equity Plans.

Thank you for your attention to our views on these matters. Higher Learning Advocates stands ready to assist NTIA as the implementation of BIL moves forward.

Sincerely,

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

Julie Peller
Executive Director