ITI Promoting Innovation Worldwide

The Honorable Maria Cantwell
Chair
U.S. Senate Committee on Commerce, Science, and Transportation
254 Russell Senate Building
Washington, DC 20510

The Honorable Roger Wicker
Ranking Member
U.S. Senate Committee on Commerce, Science, and Transportation
254 Russell Senate Building
Washington, DC 20510

The Honorable Frank Pallone, Jr.
Chairman
U.S. House Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Cathy McMorris Rodgers
Ranking Member
U.S. House Committee on Energy and Commerce
2322 Rayburn House Office Building
Washington, DC 20515

July 15, 2021

Dear Chair Cantwell, Ranking Member Wicker, Chairman Pallone, and Ranking Member McMorris Rodgers:

The Information Technology Industry Council (ITI)[1] strongly commends both Congress and the Biden Administration for taking steps to rebuild and modernize our national infrastructure. This is a unique opportunity for policymakers on both sides of the aisle to bring U.S. infrastructure into the 21st Century and leave a lasting legacy that will improve the lives of Americans for decades to come.

In today's rapidly evolving digital world, infrastructure challenges have been magnified due to the global pandemic, and the need for significant investments to close the digital divide and increase connectivity has been sharply brought into focus. The strength of existing broadband networks powered our economy through the unprecedented challenges of the last year and a half, but to accelerate American leadership in critical technologies of the future and to ensure that the shift toward virtual

[1] ITI is the premier global advocate for technology, representing the world's most innovative companies, including companies directly involved in manufacturing fiber optic cable and wireless communications equipment, along with companies that provide a range of services for the broadband communications industry. Founded in 1916, ITI is an international trade association with a team of professionals on four continents. We promote public policies and industry standards that advance competition and innovation worldwide. Our diverse membership and expert staff provide policymakers the broadest perspective and thought leadership from technology, hardware, software, services, and related industries.

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applications and services is accessible to all Americans, more must be done. Digital infrastructure is the foundation connecting Americans to the economic and social benefits that flow from a well-connected online economy, including access to virtual healthcare services, online education, small business development resources, and remote working opportunities, among others.

By making significant investments in digital infrastructure, the U.S. government can help spur economic growth and job creation, incentivize domestic investment, and meet the current and future needs of all Americans. To achieve the strongest possible outcomes and create lasting value for any infrastructure investments, we offer the following recommendations for Congress to consider as you work with the administration, industry, and other stakeholders to focus on infrastructure modernization:

Expanding Broadband Access by Utilizing Technology Neutral Solutions

Ubiquitous, affordable, high-speed broadband connections are essential to deploying new technologies and closing the digital divide, driving productivity through cloud computing and next generation communications networks, and enabling the benefits of virtual applications and services to reach communities nationwide. We encourage Congress to advance technology-neutral legislation that incentivizes the expansion of broadband access through all available technologies that can meet consumer demands into the future, including both next generation wireless network technologies such as fixed wireless service, satellite broadband, and 5G, alongside robust fiber optic cable deployments. A holistic infrastructure package should include significant support designed to supercharge American leadership in the deployment of 5G and other wireless capabilities, as well as the nascent research and development for 6G that is needed to ensure American competitiveness.

Technology neutrality is vitally important to effectively reach all areas of the country, whether urban, rural, or suburban. In some cases, geography and low population density play significant roles in determining the most effective broadband technology, and in others, increasing affordability and competition from different kinds of technology could spur greater access in urban areas already served by legacy providers. Rapid advancements in wireless technologies in recent years have allowed them to satisfy future-proof deployment needs and have vaulted them onto competitive footing with other existing technologies. As such, any Congressional deployment mandates should avoid an arbitrary 100/100 Mbps download/upload requirement. While well intended, such a standard could effectively block from consideration many wireless broadband technologies that have proven their ability to provide, and even exceed, consumer bandwidth and latency demands now and into the future. We strongly encourage Congress to consider all available broadband solutions, including fiber optic cable and wireless technologies.

Expanding Broadband Access by Utilizing Accurate Broadband Mapping

Congress should consider requiring the use of rigorous and accurate national broadband mapping to determine areas of eligibility for the use of federal subsidies. The need for better mapping than has been used previously by the Federal Communications Commission (FCC), National Telecommunications and Information Administration (NTIA), and United States Department of Agriculture (USDA) has been well documented. Recently, these three entities signed an Interagency Agreement requiring coordination when administering federal programs, an effort that will help to target unserved and underserved communities. Acting FCC Chairwoman Rosenworcel is continuing work directed by the Broadband DATA Act to improve the FCC's maps. More accurate maps should form the basis for determining eligibility for funded projects under an infrastructure package. Such a process should not only allow for a third party to challenge the validity of the FCC data, but the FCC should also consider leveraging other data sources to validate the accuracy of its broadband deployment data, identifying where the reported data is likely accurate and where there may be inaccuracies. In addition, setting an arbitrary definition of broadband for project eligibility that does not accurately reflect current or expected future demand, such as the 100/100 Mbps download/upload standard noted above, could make over half the country eligible for federal subsidies according to some estimates, leaving many truly unserved or underserved Americans in the dark. In order to stretch federal funding as far as possible, policymakers should leverage multiple data sources and granular maps, requiring deployment projects to rely on these resources.

Expanding Broadband Access by Promoting Digital Inclusion

Congress should consider addressing the affordability and accessibility concerns that are well known to reduce the adoption of broadband services, allocating funding to ensure that all Americans have the means and the skills to access digital infrastructure. We support increasing vital connectivity for students and low-income Americans by instituting a permanent program to assist with obtaining broadband subscriptions and devices, supporting both wired and wireless connections and connected devices. ITI also supports community-based digital literacy efforts to increase the skills Americans need to effectively access and use the many benefits of broadband services. Together, these investments could make significant progress toward closing the digital divide and ensuring access to virtual applications and services for all consumers who seek to use them.

Safeguarding Broadband Access by Ensuring Network Security and Resiliency

Congress should consider providing dedicated cybersecurity grant funding to ensure ongoing investment in the security of the digital infrastructure that is facilitating all aspects of American life, including the broadband networks many have come to rely on in recent months and years. Critical national infrastructure such as the electric grid and water supply often rely on outdated industrial control systems and operational technologies which can be at high risk for abuse by nefarious cyber actors. Responding to recent incidents has strained already limited cybersecurity resources, both at the Federal as well as at the State, Local, Tribal, and Territorial (SLTT) levels. At a time when SLTT governments are already under intense threat from the ransomware epidemic and struggling to modernize outdated technology, significant new funding for connectivity must be coupled with resources to advance cybersecurity and resiliency in order to protect the very networks that allow millions of Americans to access the internet.

These legislative efforts would help to close the digital divide and strengthen U.S. broadband infrastructure across rural and urban communities alike. We stand ready to assist as the legislative process moves forward, and we remain at your disposal to further discuss these important issues at your request.

Sincerely,

Jason Oxman
President & CEO