Dear Mr. Davidson:

Next Century Cities (“NCC”) respectfully submits these comments in response to the National Telecommunications and Information Administration (“NTIA”) on its role in implementing the Middle Mile (MM) Grant Program.\(^1\) Ubiquitous broadband access and adoption remain crucial for all U.S. residents. Both are inextricably tied to economic outcomes, educational opportunities, and overall well-being. With a robust, granular, and transparent reporting process informed by local leaders, additional middle-mile networks could provide the infrastructure necessary to provide high-quality, affordable service to persistently disconnected communities.

Local governments nationwide have been instrumental in deploying and maintaining broadband networks that improve public health and safety, enhance competition from private providers, and serve anchor institutions, businesses, and residents. With state and federal funding available for municipal projects, coordination with communities will help

to identify remaining needs and ensure that the middle-mile network supports widespread broadband access and adoption.

Reporting requirements should vary based on operating entity and access type. For example, an NTIA-hosted map of open-access middle-mile networks could expedite last-mile deployment timelines while facilitating collaboration between MM Grant recipients and broadband grant recipients from other federal funding programs. Local leaders are closely situated to the physical infrastructure, directly interact with the community members who will ultimately benefit from the undertaking, and often work in partnership with local broadband grant recipients. Accordingly, NTIA should solicit and rely on local expertise when developing MM Grant Program reporting requirements to identify helpful data points.

Partnering with local governments to develop NTIA’s reporting requirements could reduce information gaps, synchronize last-mile projects, and mobilize local support for middle-mile network deployment. Capacity and affordability needs vary widely by community. What works in one area may not work well in another.

Affordability for last-mile providers and residents must remain a central priority, yet existing data fails to capture current broadband pricing. The lack of standard speed tiers across providers and the inconsistency between the federal broadband speed and benchmarks for NTIA-funded projects further complicates this analysis. Furthermore, NTIA’s role extends beyond collecting broadband price and speed data. By also collecting information about redundancy, reliability, latency, and competition, NTIA can help ensure that federally funded middle-mile networks enable affordable, high-quality last-mile broadband service.
NTIA should foster communication channels between federal, state, and local leaders. Tapping into existing institutional knowledge available from community initiatives, the agency would have access to local perspectives from impacted communities that can be used to develop a robust, granular, and transparent reporting process. Local leaders are eager and well-equipped to help NTIA develop reporting requirements that outlast current grant funding. Working together, NTIA could make significant strides toward achieving universal broadband goals nationwide.

Respectfully Submitted,

Next Century Cities