

March 14, 2022

The Honorable Gina Raimondo  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, DC 20230

Dear Secretary Raimondo:

We write to you today as part of a coalition of organizations representing a wide spectrum of interests from organizations focused on broadband policy, housing, and addressing challenges facing under-resourced communities in our country. We respectfully request that National Telecommunications and Information Administration (NTIA) use its authority to ensure that States are encouraged, and highly recommended, to correctly identify unserved households living in multi-family residential housing (MDUs), and are able to prioritize the installation of internet infrastructure and Wi-Fi networks in these MDUs in order to quickly and cost-effectively bring connectivity to millions of unserved households.

The new FCC DATA maps can be used to identify broadband serviceable locations, but will not provide States or NTIA with sufficient information to determine if an MDU household lacks access to reliable broadband service and is therefore an unserved location. States must be encouraged and allowed to collect supplemental data from ISPs to identify unserved MDU households.

Improvements in Wi-Fi technology have made it possible to connect households living in MDUs to reliable broadband service simply by deploying Wi-Fi access points in the hallways and then connecting the Wi-Fi network to a high-speed broadband connection to the building.<sup>1</sup> These reliable, high-speed networks can be deployed in months, not years, and have the potential to quickly and cost-effectively connect millions of unserved and unconnected households living in low-income apartments, rentals, housing cooperatives, and public housing. These are the very same households who represent a large percentage of the most unconnected households in America: very low-income renters and communities of color.<sup>2</sup>

The installation of Wi-Fi networks in substantially unserved and high-poverty MDUs is recognized as a priority broadband deployment strategy under the Infrastructure Investment and Jobs Act (IIJA)<sup>3</sup>—and for good reason. These projects meet every goal of the IIJA by promoting Access, Adoption, Affordability, Digital Equity and Digital Inclusion. They also meet the criteria of a “priority broadband project” as the networks can be deployed in high-poverty areas, can provide high-speed, symmetrical broadband service, and can be deployed more quickly than any other type of broadband service project.

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<sup>1</sup> *In some instances the physical construction of the buildings may require extending internet infrastructure into each MDU unit.*

<sup>2</sup> See <https://www.huduser.gov/portal/periodicals/em/fall16/highlight2.html>; and <https://www.huduser.gov/portal/sites/default/files/pdf/HUD-Assisted-Renters-2017.pdf>

<sup>3</sup> See Sec. 60102.4.f.4 of the IIJA. <https://www.congress.gov/bill/117th-congress/house-bill/3684/text>

An apartment unit can be unserved for any of the following reasons. 1) There is no internet connection to the building; 2) The internet connection to the building does not have sufficient capacity to provide reliable, high-speed internet service to every unit simultaneously; 3) There is no wiring from the building's internet connection to the apartment unit; or 4) The wiring to the apartment unit is in disrepair (a common occurrence in low income apartment buildings) or is not fiber or cable (coax) connection. We applaud the FCC's efforts to strengthen their maps, but recognize that the FCC maps can only assess if reason #1 above, is true. They will not provide states with the data needed to assess reasons #2-#4.

Accordingly, states should use the FCC maps to identify whether an MDU is a broadband serviceable location, and NTIA should encourage, and highly recommend, states to provide supplemental information to determine which households in an MDU in their state lack access to reliable broadband service.

As you pointed out during your recent testimony on Capitol Hill, the FCC and NTIA will need to rely on States to provide supplemental information and to identify what areas and households are unserved. To ensure that the full promise and potential intent of the legislation is met, States must be able to count MDU households that lack access to reliable broadband. Access to broadband is an integral part of participating in the 21st century and these unserved, unconnected communities cannot be relegated to the back of the line solely based on the physical structure within which they reside.

Thank you for your attention to this important matter.

Sincerely,

African American Mayors Association

All4Ed

Benton Institute for Broadband and Society

CoSN – Consortium for School Networking

Council for Affordable and Rural Housing

Chiefs for Change

Common Sense

EducationSuperHighway

First Focus on Children

HPN - Housing Partnership Network

Institute for Real Estate Management

MMTC - Multicultural Media, Telecom and Internet Council

National Affordable Housing Management Association

National Apartment Association

National Association of Home Builders

National Association of Housing Cooperatives

National Digital Inclusion Alliance

National League of Cities

National Leased Housing Association

NAFSCE - National Association for Family, School, and Community Engagement

NMHC - National Multifamily Housing Council

NSBA - National School Boards Association

New America - Open Technology Institute

New Century Cities

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