

February 18, 2026

U.S. Department of Commerce
National Telecommunications and Information Administration
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Assistant Secretary Roth:

I am the project director for the Pew Charitable Trusts' broadband access initiative (BAI). Pew is a nonpartisan, non-profit organization that applies a rigorous analytical approach to solving public policy problems. BAI works with state and federal policymakers, researchers, and other partners to accelerate the nation's progress toward universal, affordable high-speed internet service.

Since 2021, Pew has delivered research and facilitated peer-to-peer engagement for state broadband offices (SBOs) throughout the country. This work affords us a clear view of the challenges and opportunities related to implementation and informs our recommendations. Our engagement with SBOs and state policymakers has made it clear that the strategic investment of nondeployment funds is essential to the success of the BEAD program, and states are ready to work with their internet service providers (ISPs) and communities to use both deployment and nondeployment dollars to reach their universal service goals.

As the National Telecommunications and Information Administration (NTIA) finalizes its guidance regarding the use of nondeployment funds, Pew is offering two categories of recommendations:

- Defining allowable uses of funds to both accelerate BEAD deployment and protect the long-term viability of BEAD networks.
- Issuing guidance that is decisive and clear to facilitate each state's ability to invest these dollars to address their needs, thereby avoiding delays and promoting successful program implementation.

Allowable Uses

Across the country, most states are finalizing the necessary approvals to receive their deployment funds and prepare for construction. As this preparation has moved forward, the urgency for final guidance on the use of nondeployment funds has increased. For the past several years, states have worked with ISPs and community partners to [plan](#) the best uses for nondeployment dollars. Pew's engagement with SBOs has revealed two priorities

for funds: deployment and workforce investments, and demand side support for new connections.

Deployment and Workforce: Nondeployment funds could help accelerate buildout and safeguard universal access goals for BEAD. States, ISPs, and their partners are eager to get shovels in the ground but are conscious of the variables that could delay their ability to meet BEAD's four-year construction timeline and universal service goals. The leading risks include permitting delays and shortages in the broadband workforce, which could have a significant impact on construction timelines. Nondeployment funds could alleviate these barriers through activities such as [centralized permitting support](#) and [industry certification programs](#).

Importantly, states have identified that the number of serviceable locations may evolve during the deployment process. This includes new defaulted locations emerging from other federal programs and from BEAD providers that find themselves unable to meet program obligations. Using nondeployment funds to address those locations would help ensure BEAD meets its universal access goals.

States have varied needs that will best be addressed by guidance that sets guardrails without being overly prescriptive. As such, we recommend against the NTIA narrowing the definition of "deployment and workforce" to a short list of specific use cases that may have utility in some states, but not in others. Flexible guidance would allow states to fund the tactics they know will best streamline BEAD deployment. By employing this approach, NTIA can empower states to hit BEAD program deadlines and to stretch every program dollar as far as possible to prevent the need for further federal investment.

Demand Side Support and Applied Uses: Nondeployment funds could also be used for marketing and digital skills programs to drive demand for new connections, which will safeguard the longevity of this federal commitment to universal service. Consumer outreach is vital to make residents aware of new networks and promote the use of services for activities from [remote work](#) to [online learning](#) and [telemedicine](#). Importantly, these programs can help build up the customer base that, in turn, decreases the risk of programmatic defaults.

[State legislators](#), along with several governors, have pointed to the value of investing nondeployment dollars in "[complementary, common-sense](#)" uses – including preparing the workforce with the skills they need to participate in the modern economy. Pew's engagement with SBOs has reinforced these recommendations, with SBOs identifying a range of digital skills trainings that would be valuable to their economic priorities, including facilitating use and growth of artificial intelligence (AI) applications and sector-specific applications in agriculture and health care.

Collectively, these demand side programs would help ensure that BEAD funds are being leveraged for every American to benefit from universal, high-speed connectivity and taking full economic advantage of emerging technologies.

Principles for Drafting Final Guidance

Through our research and ongoing engagement with SBOs across the country, Pew has identified four principles that are vital to ensure states can utilize nondeployment dollars as effectively and efficiently as possible. As NTIA finalizes its guidance for the expenditure of nondeployment dollars, Pew encourages NTIA to focus on the following:

- **Clarity.** States need straightforward, actionable, and decisive guidance that outlines uses of allowable spending so they can immediately design programs in alignment with state law and in collaboration with local providers and communities. Lacking this clarity and certainty, states will have challenges designing and launching nondeployment programs in time to sufficiently mitigate programmatic risks – particularly for deployment and workforce.
- **Flexibility.** There is no one-size-fits-all solution to deployment, but since the June 2025 Restructuring Policy Notice, states have demonstrated that they are adept at employing innovative, market-responsive solutions. Federal guidance should establish guardrails while giving states flexibility to meet their specific needs.
- **Timeliness.** We encourage NTIA to issue guidance that allows states to access their nondeployment funds as quickly as possible to expedite BEAD implementation. States will need to design plans, navigate procurement requirements, and launch projects—and they must factor in the lead time for those activities to ensure nondeployment funds achieve their intended impact within the period of performance. This is particularly true for applications in [permitting](#) and [workforce](#), which will require engagement and collaboration across government agencies and with external partners.
- **Reporting.** NTIA should define expectations for reporting and core outcome measurements before states launch nondeployment programs. Setting and enforcing these reporting requirements will enable the administration, policymakers, and researchers to monitor programs’ progress toward achieving intended outcomes. Establishing these requirements at the outset will enable states to incorporate these standards into their program design and ensure fidelity to spending priorities. In the long-term, it will offer the NTIA, Congress, and other entities a robust and rare opportunity to evaluate the impact of these funds across a range of factors, from the broadband’s impact on the digital economy to the most effective tools for permitting reform.

Conclusion

State broadband offices are ready to invest nondeployment dollars in their communities to support BEAD networks and create new economic opportunities. Clear, flexible guidance on nondeployment funds will help states quickly get to work and ensure that BEAD’s new networks are built, used, and sustained over time. While risks and the solutions to alleviate

them differ by state, they share a common thread – maximize the impact of every dollar spent on the BEAD program.

If there is any additional research or context that Pew can provide to help with the development of nondeployment guidelines, please do not hesitate to reach out to me at kdewit@pewtrusts.org.

Thank you for this opportunity to share Pew’s perspective.

Sincerely,
Kathryn de Wit
Project Director, Broadband Access Initiative
The Pew Charitable Trusts