



February 1, 2022

The Honorable Alan Davidson
Assistant Secretary of Commerce for Communications and Information and Administrator
National Telecommunications and Information Administration
Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: Broadband Programs in Bipartisan Infrastructure Law, NTIA Docket No. 2021-0002

Dear Assistant Secretary Davidson,

Telemedicine has increasingly become an essential component of health care in the 21st century, and the COVID-19 pandemic has made it even more critical for telehealth tools to be accessible for consumers in every American community. ATA Action advances policy to ensure all individuals have permanent access to telehealth services across the care continuum, but without a reliable and affordable broadband connection, telehealth services can be out of reach for people stuck behind the digital divide.

According to an analysis by McKinsey, the percent of U.S. consumers who used telehealth services from 2019 to 2020 grew [35 percent](#). The analysis also found that [more than 75 percent](#) of Americans expressed interest in using telehealth in the future. ATA Action supported broadband provisions included in the recently passed bipartisan Infrastructure Investment and Jobs Act that will dedicate \$42 billion toward closing the digital divide. This significant investment has the opportunity to positively change the lives of millions of unserved and underserved Americans — and to significantly increase access to critical telehealth services.

Accurate broadband data is vital to administering funds to minimize waste and to connect the greatest number of Americans who are stuck without broadband access. Robust tools that can detect and provide granular data on the isolated, underserved communities most in need of assistance will be essential in informing NTIA's determinations when evaluating grant applications. The NTIA should continue to make third-party broadband data maps available so that broadband providers and applicants have as much information as possible to guide deployments and investments.

A comprehensive approach will be required to ensure individuals gain access to affordable broadband connections. To address affordability, programs have been created to subsidize the cost of services. Though helpful, these programs fail to account for the additional expense of purchasing the device (smartphone, computer). An individual with limited funds may qualify for

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the subsidized service but without a viable device cannot use the service. It is crucial for programs to consider the full ecosystem; otherwise, they will unintentionally leave some behind.

ATA Action prioritizes health equity and access for all Americans. To reach communities where they are, promoting broadband trainings and digital literacy workshops, tailored for targeted populations, including low income, the elderly, and racial and ethnic minorities, will increase user engagement and participation. Influential digital health tools, such as artificial intelligence (AI) and machine learning systems, have versatile utility, including understanding a community's common mortalities and predicting health outcomes, and should be leveraged for preventive-care strategies. Lastly, ATA Action also recommends working with diverse stakeholders to collect various viewpoints to respond appropriately to local-level needs.

We encourage NTIA to administer these programs guided by the technology-neutral approach outlined in the statute that prioritizes unserved areas. This ensures flexibility to shape and manage grants programs. Guardrails that support such an approach will allow broadband providers to deploy the best-suited technology to quickly and effectively get communities connected where consumers lack true broadband service.

NTIA has an unprecedented opportunity to ensure that consumers in every American community have access to an affordable and reliable broadband connection and to the vital telehealth services that connection supports. We encourage you to administer these programs with regulatory guidance that ensures that as many unserved Americans as possible are served in the most cost-effective way. If you have any questions, please reach out to me at kzebley@ataaction.org.

Thank you for your attention on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Zebley", is written over a light blue circular stamp.

Kyle Zebley
Executive Director
ATA Action