



Written Input to the National Telecommunications and Information Administration
Listening Session on Uses for BEAD Non-Deployment Funds
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Submitted by: Donald Matteson, Facilitator
On behalf of the Western New York Digital Equity Coalition

Dear Assistant Secretary Roth and Distinguished Members of the NTIA Staff:

Thank you for the opportunity to submit written input relating to NTIA's listening session on uses for BEAD non-deployment funds. I write on behalf of the Western New York Digital Equity Coalition (WNYDEC), a regional network of organizations serving Allegany, Cattaraugus, Chautauqua, Erie, Genesee, Niagara, Orleans, and Wyoming Counties. I also serve as a board member of the New York State Digital Equity Network. Our region combines a legacy metropolitan area (Buffalo-Niagara) with deeply rural communities that continue to face both coverage and adoption gaps despite significant state and federal investment.

We write today in a spirit of partnership and shared commitment to ensuring that every American can access and use reliable, high-speed internet, the foundation upon which our nation's continued economic prosperity, technological innovation, and educational excellence depend.

Commendations

First, WNYDEC commends NTIA for convening these listening sessions and soliciting input from practitioners and community stakeholders before issuing guidance on non-deployment uses. This decision reflects a commitment to ground-level expertise that will produce stronger, more effective policy.

We also acknowledge that the Broadband Equity, Access, and Deployment Program represents the culmination of a historic, bipartisan recognition that universal, reliable connectivity is not a luxury but a strategic national imperative, essential to American competitiveness, workforce readiness, and the full participation of every citizen in our nation's economic and civic life. BEAD's ambition to connect every American household is an achievement of which the entire nation should be proud, and its success will be measured not only by the miles of fiber laid but by the extent to which that infrastructure transforms opportunity for the people it reaches.

Completing the Promise of Universal Coverage

Even after all "broadband-serviceable locations" are technically served, many rural residents in Western New York will remain functionally disconnected because of geography, economics, or

physical/intellectual disabilities. Paper coverage is not the same as meaningful access. BEAD non-deployment funds must be available to finish the work that deployment alone cannot complete.

Specifically, non-deployment funds should support the extension of high-quality connections and shared public access at community anchor institutions in rural communities (e.g., libraries, schools, health clinics, tribal and municipal facilities, and disability and behavioral health providers) paired with public Wi-Fi and community access points. These institutions serve as the front door to connectivity for residents whom market-driven deployment may not reach in practice, even where it reaches them on paper.

Non-deployment funds should also support carefully defined alternative technologies that close remaining rural gaps: targeted mobile coverage in persistent dead zones, fixed-wireless and community mesh networks where terrain and population density make traditional last-mile builds impractical, and middle-mile improvements (similar to Erie County's ErieNET initiative) that ensure reliability and resilience.

These investments are consistent with BEAD's statutory purpose. They simply finish the job for the same rural communities BEAD was designed to serve, rather than treating a line on a coverage map as the endpoint.

Realizing the Full Value of the Nation's Investment

For Western New York's low-income residents, older adults, and people with disabilities, the barrier to meaningful connectivity is rarely whether a fiber line passes their home. The barrier is whether they can afford the service, understand how to use it, and possess the equipment necessary to do so. Without deliberate investment in these dimensions of access, BEAD risks becoming a one-time construction program whose full value is never realized by the people and communities it was built to serve.

Non-deployment funds should therefore be explicitly available for the following purposes.

Digital navigation and sustained outreach: Multi-year support for digital navigators based in trusted organizations – libraries, community centers, disability and behavioral health providers, youth-serving nonprofits – who help residents enroll in affordable service offers, troubleshoot connectivity challenges, and stay connected over time. Digital navigation is not a one-time intervention; it is the sustained human infrastructure that makes physical infrastructure usable.

Extensive digital skills development: Programs that help first-time users navigate the internet safely, as well as integrated digital skills training embedded within existing workforce development, education, and health initiatives. BEAD-funded connectivity will translate into better jobs, stronger educational outcomes, and improved health only if residents possess the skills to use those connections productively. As multiple witnesses testified before the New York State Assembly in January 2026, New York cannot advance major investments in Empire AI, artificial intelligence infrastructure, and quantum research while many residents remain excluded from basic digital participation. AI literacy cannot exist without digital literacy. This logic extends well beyond New York State alone. If we fail to build a strong

foundation of digital skills first, emerging technologies will deepen existing divides rather than close them.

Equipment and assistive technology: Devices and adaptive technologies for low-income residents and people with disabilities (e.g., laptops, tablets, screen readers, alternative input devices, and communication aids) so that BEAD-funded infrastructure is actually usable by those who face the greatest barriers to participation. The hearing testimony before the New York State Assembly included powerful examples of how combined device access and skills training produce measurable improvements in employment, wages, and economic mobility. One witness shared the story of an eight-year unemployed military veteran who, when provided with both a laptop and training, secured employment earning \$48,000–\$50,000 annually and, within three years, was earning over \$100,000. Such transformative outcomes remain out of reach when we invest in infrastructure but fail to invest in the people that infrastructure is meant to serve.

The Urgency of This Moment

With the Digital Equity Act's termination, states like New York now rely on smaller, state-funded capacity grants to sustain digital inclusion work that was intended to operate at scale alongside BEAD deployment. BEAD non-deployment dollars may represent one of the only realistic federal funding mechanisms to sustain and grow digital inclusion infrastructure in the years ahead.

In Western New York, this is not an abstract policy question. It is the difference between BEAD functioning as a historic investment in the American people's capacity to participate in education, work, health care, and civic life, or just a construction program whose benefits never fully reach the communities that need them most.

Recommendations

We encourage NTIA, in its forthcoming guidance, to take the following actions.

1. **Affirm that BEAD non-deployment funds may support rural anchor-institution connectivity and carefully defined alternative access technologies** as legitimate extensions of deployment that complete the promise of universal coverage for communities where infrastructure alone falls short.
2. **Explicitly re-open and clarify the original menu of non-deployment uses** (i.e., digital navigation, digital skills, and devices including assistive technology) and provide states with the flexibility to design competitive subgrant programs that reflect regional needs and leverage existing community-based infrastructure.
3. **Ensure that funding structures enable community organizations to begin work immediately.** Reimbursement-only models exclude the very organizations with the deepest community trust and the strongest relationships in the populations most affected by digital inequity. Advance payment mechanisms, or at a minimum partial advances, would substantially expand the pool of qualified providers and accelerate service delivery.

4. **Recognize that, in regions like Western New York, digital inclusion investments are not supplementary.** They are essential to realizing the full value of BEAD's deployment spending and to ensuring that the nation's historic broadband investment delivers on its promise for every American.

Partnership and Path Forward

The Western New York Digital Equity Coalition brings together organizations with direct, sustained relationships in the communities BEAD is designed to serve. Our members possess the knowledge, organizational capacity, and strategic vision to translate non-deployment investments into measurable outcomes for the residents of our region.

We are eager to serve as a resource and partner to NTIA as it develops non-deployment guidance. We welcome any opportunity to participate in future convenings, share implementation data from our region's digital equity programming, or contribute to the design and evaluation of non-deployment subgrant structures. The Western New York Digital Equity Coalition stands ready to prove that when resources meet local expertise, community-led initiatives transform flexibility into measurable, high-impact results.

Thank you for considering our input and for your continued commitment to connecting every American to the opportunities that reliable, high-speed internet makes possible.

Respectfully submitted,



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For questions or additional information, please contact:

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