

July 14, 2026

The Honorable Arielle Roth
Assistant Secretary of Commerce for Communications and Information
Administrator, National Telecommunications and Information Administration
U.S. Department of Commerce 1401 Constitution Ave., NW Washington, DC 20230

Re: Accountability and Transparency in Measuring BEAD Performance

Dear Administrator Roth:

We are a labor union and public interest organizations that advocate for high-speed broadband for all. We have been stakeholders in the BEAD program at the federal and state levels, and we represent communities affected by the Broadband Equity, Access, and Deployment (BEAD) Program, both as consumers and workers. Like NTIA, we want to see the BEAD Program realize its goal of connecting unserved and underserved communities, and for those communities to be connected to resilient, quality networks for generations to come.

We write to express our support for the recommendations made by NTCA-The Rural Broadband Association in its May 19, 2026, letter,¹ that NTIA publicly release the results of subgrantees' performance testing, and/or direct Eligible Entities to publish performance testing results. We further note that NTIA permits Eligible Entities to engage in additional testing or reporting requirements,² and we encourage the publication of these results as well.

The BEAD Program conditions funding on subgrantees meeting speed and latency standards and performance testing requirements.³ However, there is currently no requirement that these performance test results be made available to the public.

Like NTCA, we agree that accountability and transparency are critical to the success of BEAD. We are also deeply concerned about some providers' ability to carry out their commitments under the program. In particular, reports that Amazon LEO has already withdrawn from awarded locations or is renegotiating terms in multiple states⁴ and that SpaceX sought changes from states

¹ NTCA Letter, "Accountability and Transparency in Measuring BEAD Performance," May 19, 2026, <https://www.ntca.org/sites/default/files/federal-filing/2026-05/5.19.26%20NTIA%20BEAD%20Letter.pdf>

² Frequently Asked Questions and Answers, Version 20, Broadband Equity, Access, and Deployment (BEAD) Program, p. 60, https://broadbandusa.ntia.gov/sites/default/files/2026-04/BEAD_FAQs_v20.pdf ("An Eligible Entity may elect to include in subgrant agreements additional testing and reporting requirements to monitor construction progress, such as construction validation or acceptance testing. The results of these tests are not required by NTIA and, therefore, will not be collected or reviewed by NTIA.")

³ Id., Department of Commerce, National Telecommunications and Information Administration, Broadband Equity, Access, and Deployment (BEAD) Program: Performance Measures for BEAD Last-Mile Networks, https://broadbandusa.ntia.gov/funding-programs/policies-waivers/Performance_Measures_Policy_Notice. By statute, an entity that receives a BEAD subgrant for the deployment of a broadband network must provide 100/20 service with latency that is sufficiently low to allow reasonably foreseeable, real-time, interactive applications and with network outages that do not exceed, on average, 48 hours over any 365-day period. 47 U.S. Code § 1702 (h)(4)(A).

⁴ "Amazon, 3 Regional ISPs Back out of Texas BEAD Contracts," CommunicationsDaily, June 5, 2026, <https://communicationsdaily.com/article/2026/06/05/amazon-3-regional-isps-back-out-of-texas-bead-contracts>;

to its performance commitments⁵ raise concerns about whether all providers are capable of fulfilling their promise of high-speed broadband for rural Americans. Recent reports about the skyrocketing price of SpaceX service underscore the importance of ensuring that publicly subsidized service performs as promised.⁶

Releasing the results of performance testing will allow the public to assess the performance of companies that have made commitments in exchange for public dollars. These results should be posted on the NTIA website, subgrantee by subgrantee, enabling affected communities and policymakers to see which services communities are receiving as a result of BEAD. This transparency will incentivize providers to follow through on their commitments and promote accountability for these companies that made commitments to American taxpayers. As NTCA stated, the public release of performance testing data represents “good government” and good stewardship of public dollars. This simple measure would promote accountability and transparency in a program that commits substantial public funds.

Thank you for your continued work and attention to this matter. We welcome the opportunity to discuss these issues further.

Sincerely,

Nell Geiser
Communications Workers of America

Drew Garner
Benton Institute for Broadband & Society

Amy Huffman
National Digital Inclusion Alliance

Jonathan Walter
The Leadership Conference on Civil and Human Rights

Jessica Dine
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Alexandra Green
The Utility Reform Network

“Amazon, Two Local ISPs Back Out of BEAD in Nebraska” Broadband Breakfast, May 26, 2026, <https://broadbandbreakfast.com/amazon-two-local-isps-back-out-of-bead-in-nebraska/>;

⁵ SpaceX stated that these performance obligations, if “unaddressed, could render LEO participation in the program untenable.” “NTIA responds to SpaceX BEAD rider,” Telecompetitor, February 5, 2026, <https://www.telecompetitor.com/ntia-responds-to-spacex-bead-rider/>.

⁶ “Musk’s Starlink hooked rural customers. Then came the price increases.” The Washington Post, June 11, 2026, https://www.washingtonpost.com/technology/2026/06/11/starlink-is-star-spacex-ipo-is-it-monopolizing-rural-internet/?utm_campaign=Newsletters&utm_medium=email&utm_source=sendgrid.

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