October 26, 2026

Before the
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
U.S. Department of Commerce

In the Matter of	Reference
Agency Information Collection Activities; Comment Request; Application for Competitive Grant Program	OMB Control No. 0660-0055 FR Doc. 2026-17322, 91 FR 54848 (Aug. 25, 2026) Competitive Grant Program Application Forms Comment

COMMENTS OF CONNECTED NATION

Submitted to: Jennifer Duane, Director, Grants Management, Administration, and Compliance, Office of Internet Connectivity and Growth, National Telecommunications and Information Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW, Room 4874, Washington, DC 20230 — via email to broadbandusa@ntia.gov

I. Introduction and Summary

Connected Nation (CN) respectfully submits these comments in response to the National Telecommunications and Information Administration's (NTIA) August 25, 2026, notice requesting comment on the proposed revision of the information collection for the Digital Equity Competitive Grant Program (Competitive Grant Program).

CN is a national nonprofit organization founded in 2001 with a mission to expand the access, adoption, and use of broadband and its related technologies to all people. Over 25 years, CN has worked in all 50 states and three U.S. territories on broadband mapping, planning, and digital skills programs, including publishing the nation's first statewide broadband map in 2004. CN has also completed more than 650 community technology action plans, backed by data from more than 25,000 survey responses, and has trained more than 150,000 individuals in digital skills. That record gives CN direct experience in both delivering programs and measuring their results.

CN supports NTIA's efforts to restart the Competitive Grant Program under 47 U.S.C. § 1724. Because applicants will be competing for a finite, statutorily appropriated pool of funds, the application instrument should do two things well: give NTIA the information it needs to identify projects that will deliver measurable results for the public investment and avoid imposing burden that does not serve that purpose.

CN's comments fall into two categories — technical recommendations on the application instrument, and recommendations on measuring outcomes — summarized below:

Technical

1. Publish the burden methodology and draft forms and estimate burden for partnership applications by role.
2. Clarify how proposals should align with state digital equity goals or remove this requirement.
3. Replace the spreadsheets with a single portal application that lets partners enter their own information, with SAM.gov lookups, a built-in budget builder, and pre-filled baseline data.
4. Provide an application window of at least 90 days for partnership applications.

Measuring Outcomes

1. Ask applicants to describe long-term data collection and evaluation plans spanning the full statutory grant and evaluation period.
2. Provide adequate narrative space for applicant-designed goals, methodologies, and expected short- and long-term results.
3. Permit outcome measures beyond subscription counts, including education, telehealth, and economic outcomes.
4. Ask applicants to identify the specific barriers to adoption their programs address, and credit programs that address more than one.
5. Allow reuse of prior data and methodologies, and expressly encourage automated collection techniques, including natural language processing and sentiment analysis.

II. Background

Section 60305 of the Infrastructure Investment and Jobs Act (Pub. L. 117-58), codified at 47 U.S.C. § 1724, authorizes the Competitive Grant Program. NTIA describes the program's purposes as including advancing broadband adoption, digital skills development, and access to public connectivity resources, and states that it will use the information collected to review proposed applications and budgets from eligible entities as defined in 47 U.S.C. § 1724(b).

The notice proposes a revision of an existing collection and provides the following estimates:

Item	NTIA estimate (91 FR 54849)
OMB Control Number	0660-0055 (revision of a current collection)
Form numbers	TBD
Method of collection	Electronic and mail submission
Estimated respondents	800
Time per response	18 hours per applicant

Item	NTIA estimate (91 FR 54849)
Total annual burden	14,400 hours
Total annual cost to public	$696,240 (implies about $48.35 per hour)
Respondent's obligation	Mandatory

NTIA invites comment on whether the collection is necessary and has practical utility; the accuracy of its burden estimate; ways to enhance the quality, utility, and clarity of the information collected; and ways to minimize burden, including through information technology. CN's comments are organized in two categories — Technical and Measuring Outcomes.

III. Comments

A. Technical Comments

1. Accuracy of the Burden Estimate

NTIA estimates 18 hours per applicant and a total cost to the public of $696,240, which implies a labor rate of about $48.35 per hour.

That estimate does not fit the partnership applications the program is designed to encourage. The 2024 NOFO stated that "partnerships are an effective means of serving the Covered Populations and they are encouraged" (Section III.A) and that "NTIA encourages partnerships of multiple eligible entities to consider applying for larger awards," with awards of $5 million to $12 million. It also required a binding Letter of Commitment from every partner.

CN strongly supports this model. Partnerships let community-based organizations that could not administer a federal award on their own reach covered populations, while an experienced Authorized Representative manages federal compliance. CN urges NTIA to keep the model and to estimate burden in a way that reflects the work it requires.

In 2024, CN served as the Authorized Representative for the Everyone Connected Initiative, a 17-member partnership application spanning Kentucky, Texas, Michigan, Illinois, Puerto Rico, and national partners, and was a partner on at least five other organizations' applications. Those forms carried the same OMB Control No. 0660-0055, which is now being revised.

The final week alone took more than 26 times NTIA's estimate. At NTIA's own rate of $48.35 an hour, those 480 hours cost about $23,200, compared with NTIA's estimate of $870 per applicant. The partner coordination before that week added an estimated 128 to 192 hours. Much of that time was CN integrating workstreams and budgets and doing work its smaller partners lacked the staff to do: drafting scopes of work, building five-year budgets and match schedules, and assembling eligibility documents and UEI registrations. These hours are CN staff time only. Each partner also spent time in the same meetings and reviews, and partners named on more than one application repeated that work for each application.

In practice, the model asks organizations with the capacity to manage a federal award to serve as Authorized Representative and bring in smaller, community-based organizations that could not apply for or administer a $5 million award on their own. That was CN's role in 2024. That work falls on the Authorized Representative because the program requires it. An 18-hour estimate fits a single organization completing forms alone, not the partnership applications NTIA encourages.

The methodology and assumptions cannot be evaluated because the notice does not publish them, and the form numbers are listed as "TBD." Under 5 CFR 1320.3(b), burden includes reviewing instructions, searching data sources, and gathering the needed data, not just completing the forms. For a partnership, gathering the data means collecting each partner's budget, match, Letter of Commitment, eligibility documents, and identifiers. If the 18 hours covers only form completion, it leaves out burdens the definition requires. If it covers everything, it is far too low.

CN asks NTIA to:

- Publish the burden methodology and draft forms with the 30-day notice.
- Estimate burden for partnership applications by role: the Authorized Representative's time for each partner it coordinates, plus each partner's own time, rather than a single figure per applicant.

2. Clarity of Forms and Instructions

Clear instructions let every applicant give NTIA the same kind of information. The most pressing gap is how proposals should relate to state digital equity goals.

The 2024 Project(s) Description Form asks for one row per "specific implementation activity and/or intervention." In CN's application, each row was one organization's work in one of four project areas, such as a single partner's digital skills training, for 20 rows in all. Every row required a narrative on its relationship to the State Digital Equity Plan. The NOFO also asked applicants to address State plans in the executive summary, and reviewers weighed alignment under Project Need, Purpose, and Benefits.

The practical utility of that field is now uncertain. The State Digital Equity Planning and Capacity Grant Programs which funded those plans and their implementation, have been canceled, some states have paused or are revising their plans, and neither Commerce's court filings nor this notice say how the plans will be used in the reopened program.

CN asks NTIA to state, in the draft NOFO or with the 30-day notice, how proposals should align with state digital equity goals if not those in the State plans, and to set the form to match. If alignment is no longer required, the field should be removed. If it is, one statement per state or territory at the application level would provide the same information as a narrative on every activity row.

3. Minimizing Burden on Respondents

The 2024 application asked for much of the same information several times, across two separate spreadsheets, multiple uploaded attachments, and the budget. Applicants had to enter partner identifiers, funding amounts, match, and the same narrative topics in more than one place and

keep them consistent. Factor (d) invites ways to reduce burden through information technology, and moving the application into the NTIA Grants Portal could remove most of this duplication. CN recommends:

- **Replace the spreadsheets with one online application.** The Partnership Members Form and the Project(s) Description Form were separate spreadsheets describing the same partners, and about 29,400 words of narrative went into Excel cells. NTIA should combine them into a single portal application with structured fields for counts, dollars, and geographies; narrative fields with clear character limits; and each narrative topic requested once, not in both a spreadsheet and an attachment. Built-in checks for missing fields, mismatched totals, and matches below the 10 percent minimum would catch errors before submission.
- **Let partners enter their own information.** Partner coordination took CN an estimated 128 to 192 hours in 2024, much of it collecting and correcting each partner's scope, budget, and documents. Portal accounts for partner organizations would let each partner enter its own scope, budget, match, and identifiers and sign its Letter of Commitment electronically, with the Authorized Representative reviewing and approving.
- **Enter partner data once and reuse it.** Each funded partner's legal name, UEI, and EIN were entered on the Partnership Members Form and again on every activity row that partner implemented. One partner record, carried automatically into every activity and the budget, would end that repetition. A SAM.gov lookup by UEI could fill in registration details and flag partners whose registration is missing or expired well before the deadline.
- **Build partner budgets in the portal.** CN built five-year grant, in-kind, and cash schedules for each of 16 partners and matched every figure by hand across four documents. As scopes changed, the partnership's projected total moved from $15.5 million to $19.3 million, and we had to reconcile each change. A portal budget builder with five annual columns per partner that rolls up automatically into the application budget and calculates match would remove most of that work. Standard match language for Letters of Commitment would also reduce back-and-forth with partners.
- **Pre-fill baseline data by geography.** The 2024 form required 180 covered population and covered household percentages across CN's activity rows. When an applicant selects its service area, the portal could pull those figures from a standard federal source, such as Census American Community Survey data, so applicants don't have to source their own, and every application uses the same baseline. The Census Bureau’s Digital Equity Act Population Viewer already did much of this, mapping covered populations at the state, county, and census tract levels. NTIA should restore the Viewer, update it with current American Community Survey data, show the covered populations that apply in the reopened program, and make it the reference source for the application, so applicants and reviewers work from the same figures.

- **Set an application window that fits partnership work.** If the NOFO opens in December 2026, a 60-day window would overlap the holidays. CN recommends at least 90 days for partnership applications.

B. Measuring Outcomes

NTIA's notice concerns the information collected in the application. The application is also where each applicant commits to how it will measure results, and that commitment shapes the data NTIA will receive for the life of the grant. The statute already anticipates rigorous evaluation: grantees may use up to 10 percent of their award to measure and evaluate funded activities, must submit evaluations within 15 months of receiving the grant and annually thereafter, and may continue evaluation for one year after the four-year expenditure period ends (47 U.S.C. § 1724(d)(2)(B), (D)). To give that framework practical utility, CN recommends that the application collect a clearly stated data collection plan and methodology from every applicant, as described below.

1. Long-Term Data Collection and Evaluation

The problems these programs address take time to improve. Whether a digital skills, device, or adoption program is succeeding will not be fully apparent in months, or even within the first year. Identifying which programs work, and which practices should be replicated, requires measurement across the full five-year window the statute provides. The application should ask applicants to explain how they will measure progress in the short term and success in the long term, including what they will measure, when, and how, and how the evaluation set-aside will be used across the grant and evaluation periods.

2. Flexibility and Adequate Narrative Space for Applicant-Designed Programs

Eligible entities should be able to design programs that fit the needs of the communities they serve, and the application should encourage that flexibility. Flexibility only works, however, if applicants have room to explain it. NTIA should provide adequate narrative space, or character limits, for applicants to state their short-term and long-term goals, the methodology they will use to pursue and measure them, and the results they expect. Clear statements of these elements will also give reviewers a sounder basis for comparing proposals and holding grantees to their commitments.

3. Outcome Measures Beyond Subscription Counts

A count of new subscribers is a useful intermediate measure, but it is not the return on the public investment. The statute itself ties broadband adoption to educational and employment opportunities (47 U.S.C. § 1724(d)(2)(A)(ii)). The value of home broadband lies in what it enables: improved educational outcomes, access to healthcare through telehealth, and economic development. The application should allow applicants to propose outcome measures in these areas, using methodologies appropriate to the project's geographic scope, goals, and timeframe.

4. Barriers to Adoption

Households that do not subscribe to broadband often face more than one barrier at once, most commonly affordability, gaps in digital skills, and the lack of a computing device. A program that

addresses only one of these may leave the others in place and fail to change outcomes. The application should ask applicants to identify the specific barriers their programs will address and how progress on each will be measured. NTIA should encourage programs that address multiple barriers, consistent with the range of eligible activities in 47 U.S.C. § 1724(d)(2)(A).

5. Reuse of Prior Data and Methodologies

To the greatest extent possible, applicants should be permitted to reuse data, needs assessments, and methodologies developed for prior applications, including applications submitted under the 2024 Notice of Funding Opportunity, updated as needed. Building on existing work will improve the quality of responses while reducing the burden on applicants, consistent with factor (d).

6. Automated Collection Techniques: Natural Language Processing and Sentiment Analysis

Factor (d) asks how burden can be minimized through automated collection techniques or other forms of information technology. CN believes natural language processing (NLP), and sentiment analysis in particular, can reduce burden at three points in the grant lifecycle while improving the quality of the information NTIA receives.

Community needs assessments. Demonstrating localized need for adoption and digital skills support is among the most time-intensive parts of an application. Applicants often conduct and synthesize surveys or hold extensive focus groups. Both are valid and well suited to localized studies but are difficult to scale. Sentiment analysis applied to existing, unstructured community data, such as transcripts of public meetings, public feedback, and targeted comment submissions, could help applicants identify and document community needs more efficiently. Surveys could then be reserved for smaller, more localized studies where they add the most value.

Post-award reporting. Evaluating digital skills development and access to public connectivity resources depends heavily on qualitative feedback, which grantees typically summarize in lengthy narrative reports. Grantees could instead apply sentiment analysis to post-training feedback forms or help-desk records to generate consistent, quantitative measures of participant response. The approach requires up-front work to define how language will be classified but once developed it can be run repeatedly on successive data sets and adapted for similar programs, shifting the reporting burden from manual drafting to automated data generation.

Utility for NTIA. NTIA estimates 800 applications, each followed by years of performance reports. Narrative reports are difficult to compare across regions and reviewers. Standardized outputs, for example classifying participants' digital skills confidence as positive, neutral, or negative, would give NTIA comparable data across awards and support more consistent review of program performance.

These tools should be permitted, not required, and used with appropriate safeguards: protection of personally identifiable information, transparency about data sources and methods, and human validation of automated results. Used this way, they reflect the purpose of Section 60305 of the Infrastructure Investment and Jobs Act, which is to modernize the nation's digital infrastructure. It

is fitting that the funds Congress provided for that purpose be administered with modern, efficient data methods.

Recommendation. NTIA should update the Information Collection Request instructions to state: "Applicants and grantees are encouraged to use automated collection techniques, including natural language processing and sentiment analysis tools, to aggregate community feedback, demonstrate local need, and report on program efficacy, thereby reducing manual narrative reporting burdens."

IV. Conclusion

CN appreciates the opportunity to comment and supports NTIA's work on the Competitive Grant Program. An application instrument built around clear outcomes — with burden proportionate to that purpose — will help ensure that every dollar Congress appropriated is directed to projects that can demonstrate results. CN looks forward to working with NTIA to ensure the Competitive Grant Program delivers measurable, lasting results, and is glad to share its experience in long-term data collection, evaluation, and automated analysis as NTIA finalizes this information collection.

Respectfully submitted,

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