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Howard Lutnick  
United States Secretary  
U.S. Department of Commerce  
1401 Constitution Ave.,  
Washington, D.C. 20230

Arielle Roth  
Assistant Secretary of Commerce for  
Communications and Information  
N.W. National Telecommunications  
& Information Administration  
1401 Constitution Ave., N.W.  
Washington, D.C. 20230

**Secretary Lutnick and Assistant Secretary Roth:**

On behalf of the National States Geographic Information Council (NSGIC) - the national non-profit 501(c)(6) representing state geographic information system (GIS) leaders working to advance effective geospatial policy and technology - **I write to respectfully urge the Department of Commerce and NTIA to provide clear guidance allowing States to use *non-deployment* BEAD funds for geospatial mapping activities essential to broadband expansion and incorporate their address data into the National Address Database (NAD).** States are eager to partner with NTIA to ensure that BEAD investments are efficient, accurate, and sustainable. This guidance would materially advance these goals.

The **BEAD Restructuring Policy Notice (BRPN)** published June 6, 2025, states:

*“Funding for allowable non-deployment purposes is under review and NTIA will issue updated guidance in the future... NTIA rescinds approval of all non-deployment activities... Final Proposals will only require detail on the use of BEAD funds for deployment projects.”*

While we understand NTIA's need to focus on efficient deployment, the federal statute is explicit: BEAD funding **is not limited to infrastructure construction**. Congress intentionally authorized a broad portfolio of eligible uses to ensure that investments are accurate, equitable, and accountable. Under **47 U.S.C. § 1702(f)**, eligible uses include **data collection, broadband mapping, and planning** - activities fundamental to addressing the digital divide.

Accurate, current mapping is the foundation of broadband deployment, auditability, and public trust. Without granular, location-based data on existing infrastructure, service availability, residences, and businesses, States cannot effectively plan or validate BEAD-funded projects. Continued investment in state mapping programs will

significantly improve the efficiency, accuracy, and long-term value of BEAD deployment - while also supporting critical national priorities such as emergency response coordination, economic development, public safety, and resilient infrastructure planning.

**We therefore request that NTIA issue updated guidance explicitly affirming that States may use non-deployment BEAD funds for the full suite of geospatial mapping activities authorized in statute.**

Additionally, NSGIC strongly encourages the Department of Commerce and NTIA to direct BEAD recipients to **submit updated address point data they develop or acquire to the National Address Database (NAD)**. This single action would substantially improve national interoperability, reduce duplicative federal and state data collection efforts, and strengthen the integrity of broadband availability maps across the government.

In 2021, the FCC contracted for a national set of address-level spatial data known as the Serviceable Location Fabric. If a similar dataset is needed in the future, broad participation in the NAD would allow the FCC to leverage an authoritative, shared resource - saving an estimated \$100 million and improving long-term data sustainability.

States are eager to partner with NTIA to ensure that BEAD investments are efficient, accurate, and sustainable. Clear guidance supporting the use of BEAD funds for mapping - and incorporating address data into the NAD - would materially advance these goals.

Thank you for your leadership and for your continued partnership with the states.

Sincerely,

*Mark Yacucci*

Mark Yacucci  
President  
National States Geographic Information Council (NSGIC)

Cc: John S. Jordan, CAE  
Executive Director  
National States Geographic Information Council (NSGIC)