



LEADERSHIP • TECHNOLOGY • INNOVATION • LEARNING

August 8, 2025

Mr. Christopher Quarles
Policy Advisor
National Telecommunications and Information Administration
1401 Constitution Avenue NW, Suite 4725
Washington, D.C. 20230

RE: Comments on NTIA Internet Use Survey (OMB Control Number 0660–0021)

Dear Mr. Quarles:

On behalf of [SETDA](https://www.setda.org/), thank you for the opportunity to comment on the proposed revision of the NTIA Internet Use Survey. SETDA strongly supports this essential data collection effort, which provides valuable and critical insights into broadband adoption and use across the United States.

As the national association representing U.S. state and territorial leaders advancing educational technology policy, SETDA has long emphasized the importance of reliable, disaggregated data to inform policy decisions. Ensuring that all learners—regardless of geography, income, or background—have access to the tools and infrastructure necessary for success in school and beyond requires data systems that reflect the realities faced by students and their families.

To strengthen the survey's utility for education leaders and policymakers, SETDA recommends refining the **device access** questions to distinguish whether student devices are personally owned or provided by a school, library, or other public institution. This distinction is critical to assessing the sustainability and long-term impact of digital inclusion efforts, particularly those initiated during the COVID-19 pandemic to expand access through school-issued devices and connectivity supports.

This recommendation aligns with the *Digital Access Data Collection Blueprint* developed by the Council of Chief State School Officers (CCSSO), which outlines priority data elements state education agencies need to better understand and address digital equity gaps. Consistent with that framework—as well as SETDA's own research—granular data on device ownership and institutional support is essential for evaluating equitable access, instructional readiness, and student well-being.

The **Universal Connectivity Imperative** (UCI) report (January 2025), attached for reference, offers further context for this recommendation. Developed with input from federal, state, and local education leaders; researchers; nonprofit organizations; industry partners; and K–12 educators and students, the UCI provides a roadmap for closing the digital access divide and ensuring long-term sustainability of inclusion efforts (see page 39 for specific device access guidance).

SETDA applauds NTIA's continued leadership in advancing data-informed broadband and digital equity policies. We value the opportunity to provide input and welcome continued collaboration in support of high-quality, equitable digital learning for all students.

Sincerely,

Julia Fallon
Executive Director, SETDA

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<https://www.setda.org/priorities/equity-of-access/broadband-imperative/universal-connectivity-imperative/>