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Washington, DC 20548

Comptroller General
of the United States

July 14, 2025

The Honorable Adam Cassady
Acting Assistant Secretary of Commerce for Communications and Information and Acting NTIA Administrator
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, D.C. 20230

Priority Open Recommendations: National Telecommunications and Information Administration

Dear Acting Assistant Secretary Cassady:

The purpose of this letter is to call your personal attention to three areas based on GAO's past work and 11 open priority recommendations, which are enclosed.[1] Additionally, there are 24 other GAO open recommendations that we will continue to work with your staff to address.

We are highlighting the following areas that warrant your timely and focused attention. Specifically:

Managing the radio-frequency spectrum. Radio-frequency spectrum demand among government and private sector users has increased. This, in turn, has increased the potential for interference problems. We identified two priority recommendations to improve the National Telecommunications and Information Administration's (NTIA) efforts to regulate and manage spectrum use for federal users. Specifically, we recommended that NTIA establish procedures to help guide the design of spectrum-sharing and potential interference studies in order to support reaching consensus among participating federal stakeholders.

Additionally, we recommended that NTIA request that the Department of State review and update the key guidance document outlining processes for working with other agencies to prepare for international conferences where spectrum regulations are updated.

Taking these actions would better position NTIA to reach agreement with other federal agencies regarding spectrum management issues.

Managing cybersecurity risks and IT. The security of the IT systems federal agencies use to carry out operations and process essential information is vital to protecting national security. However, risks to IT systems are increasing. Further, to manage spectrum, NTIA relies on various outdated IT systems that present challenges and hinder its ability to efficiently manage

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[1]GAO considers a recommendation to be a priority if when implemented, it may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

spectrum. We have highlighted the need to ensure the cybersecurity of the nation and improve IT acquisitions and management on our High-Risk List.[2]

We identified six priority recommendations related to NTIA's efforts to address risks and modernize its spectrum IT systems. For example, we recommended that NTIA take key steps in performing this modernization to better align its efforts with leading practices for IT modernizations, project management, cybersecurity, and interoperability. Such steps, detailed in Enclosure 1, include developing a reliable cost estimate and schedule, as well as an organizational risk management strategy and risk assessment, among other actions. Taking these actions would better position NTIA to address these high-risk areas and implement a successful modernization, including by identifying and reducing cybersecurity risks.

Managing federal broadband programs. Broadband internet has become critical for daily life as, increasingly, everyday activities occur online, including job applications, work, school and homework, and health care appointments. Increasing access to broadband is an ongoing national challenge. Federal broadband efforts are fragmented and overlapping with over 130 programs managed by 15 agencies, as of our 2022 inventory.[3] We recommended that NTIA, in collaboration and agreement with the Federal Communications Commission and the Departments of Agriculture and the Treasury, as appropriate, clearly define and formally document the agencies' processes for addressing potentially duplicative broadband funding.

Additionally, tribal entities have historically been at a disadvantage in competing for federal broadband funding. Fraud risk management is particularly important as federal funding for broadband increases because the potential for fraud also increases. We recommended that NTIA report to Congress on the resources necessary to ensure the financial sustainability of tribal infrastructure projects. We also recommended that NTIA examine the suitability of existing antifraud controls in the tribal broadband program and prioritize residual fraud risks.

Taking these actions would better position NTIA to manage federal broadband spending and implementation efficiently and effectively, including by reducing the risk of potentially wasteful duplication.

Please see Enclosure 1 for additional details about the status and actions needed to fully implement all 11 open priority recommendations out of the 35 total recommendations that remain open.

We also provide in Enclosure 2 additional information on NTIA's recommendation implementation rate and implemented, closed, and new priority recommendations since June 2024, and relevant management challenges from our High-Risk List that apply to NTIA.[4] In

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[2]GAO, *High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, GAO-25-107743 (Washington, D.C.: Feb. 25, 2025).

[3]GAO, *Broadband: National Strategy Needed to Guide Federal Efforts to Reduce Digital Divide*, GAO-22-104611 (Washington, D.C.: May 31, 2022).

[4]In prior years, we included priority recommendations addressed to NTIA in the letter listing priority recommendations to the Department of Commerce. See, for example, GAO, *Priority Open Recommendations: Department of Commerce*, GAO-24-107326 (Washington, D.C.: June 5, 2024). This is the first year that we are issuing a separate letter specific to NTIA. Previously, NTIA's recommendations were included in the recommendation counts and implementation rate for the Department of Commerce, which now no longer includes recommendations addressed to NTIA. See GAO, *Priority Open Recommendations: Department of Commerce*, GAO-25-108059 (Washington, D.C.: May 22, 2025).

response to legislation enacted in December 2022, this enclosure also includes information on any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.

Copies of this letter are being sent to the appropriate congressional committees. The letter will also be available on the GAO website at Priority Recommendations | U.S. GAO.

If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Andrew Von Ah, Director, Physical Infrastructure, at vonaha@gao.gov. Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this letter. Our teams will continue to coordinate with your staff on addressing these priority recommendations and the remaining 24 open recommendations. I appreciate NTIA's continued commitment and thank you for your personal attention to these important issues.

Sincerely,

//SIGNED//

Heather Krause
Managing Director, Physical Infrastructure

Enclosures – 2

cc: The Honorable Karin O'Leary, Deputy Assistant Secretary for Operations and
        Administration, NTIA
        Mr. Alan Rosner, Acting Chief Information Officer, NTIA
        Patrick Sullivan, Senior Attorney Advisor, NTIA
        AJ Coley, Attorney Advisor, NTIA
        MaryAnn Mausser, GAO Audit Liaison, Department of Commerce

Enclosure 1

Priority Open Recommendations to the National Telecommunications and Information Administration (NTIA)

Managing the Radio-Frequency Spectrum

Spectrum Management: Agencies Should Strengthen Collaborative Mechanisms and Processes to Address Potential Interference. GAO-21-474. Washington, D.C.: June 29, 2021.

Year Recommendations Made: 2021

Recommendations:

- The NTIA Administrator should request that the Department of State initiate a review of the General Guidance Document—in consultation with NTIA, the Federal Communications Commission (FCC), and other relevant participants—and update and develop a means to continually monitor and update this document.

- The NTIA Administrator should establish procedures to help guide the design (including selection of acceptable assumptions and methodologies) of spectrum-sharing and potential-interference studies intended as U.S. contributions to World Radiocommunication Conference technical meetings, in consultation with FCC, State, and other federal participants of the U.S. technical preparatory process.

Actions Needed: NTIA agreed with both recommendations. Regarding the General Guidance Document, NTIA requested that State review and update the document, and NTIA officials said they continue to work with State on this issue. Specifically, as of March 2025, NTIA officials said their formal request with State to update their General Guidance Document is in progress. To fully implement the recommendation, NTIA needs to provide documentation of its formal request to State to develop a means to continually monitor and update the General Guidance Document.

Regarding study design procedures, NTIA published the National Spectrum Strategy Implementation Plan in March 2024. This plan calls for spectrum band studies related to spectrum sharing and coexistence between federal and non-federal systems that use spectrum. As of March 2025, NTIA officials said these studies are in progress, and they will provide additional information as it becomes available. To fully implement the recommendation, NTIA needs to complete the development of procedures to guide spectrum-sharing and potential interference studies. Implementing these two recommendations would improve NTIA's ability to manage spectrum and reach agreement on related matters with other federal agencies.

Directors: Andrew Von Ah, Physical Infrastructure and Karen L. Howard, Science, Technology Assessment, and Analytics

Contact Information: vonaha@gao.gov and howardk@gao.gov

Managing Cybersecurity Risks and IT

Spectrum IT Modernization: Incorporating Leading Practices Could Improve Planning Effort. GAO-24-106634. Washington, D.C.: March 19, 2024.

Year Recommendations Made: 2024

Recommendations:

- The Office of Spectrum Management should develop a high-quality reliable cost estimate that aligns with cost estimating best practices as defined in GAO's Cost Guide and Agile Guide for the IT modernization project.

- The Office of Spectrum Management should develop a reliable integrated master schedule that aligns with scheduling best practices as defined in GAO's Schedule Assessment Guide and Agile Guide for the IT modernization project.

Actions Needed: NTIA agreed with both recommendations. Related to developing a cost estimate, according to NTIA officials, as of March 2025, NTIA had completed an estimate but was in the process of conducting final reviews of the estimate. To fully implement this recommendation, NTIA needs to complete its review of the estimate and ensure that the estimate aligns with the best practices in our Cost and Agile Guides.[5]

Related to developing an integrated master schedule, NTIA officials stated that NTIA intended to award a master contract vehicle for the modernization and that, after this award, it would award a task order to support development of a roadmap and schedule. According to NTIA officials, as of March 2025, NTIA anticipated awarding the task order in March 2025; the task order would allow 30 days to complete the roadmap and schedule planning. As of May 2025, we are awaiting additional information from NTIA. To fully implement this recommendation, NTIA needs to award the task order and, upon receipt of the schedule, ensure that the schedule aligns with the best practices in GAO's Schedule Assessment and Agile Guides.[6] Implementing these two recommendations would position the agency to achieve a successful modernization.

High-Risk Area: Ensuring the Cybersecurity of the Nation, Improving IT Acquisitions and Management

Director: Andrew Von Ah, Physical Infrastructure

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[5]GAO, *Cost Estimating and Assessment Guide: Best Practices for Developing and Managing Program Costs*, GAO-20-195G (Washington, D.C.: Mar. 12, 2020); and *Agile Assessment Guide: Best Practices for Adoption and Implementation*, GAO-24-105506 (Washington, D.C.: Nov. 28, 2023).

[6]GAO, *Schedule Assessment Guide: Best Practices for Project Schedules*, GAO-16-89G (Washington, D.C.: Dec. 22, 2015); and GAO-24-105506.

Spectrum IT Modernization: NTIA Should Fully Incorporate Cybersecurity and Interoperability Leading Practices. GAO-25-107509. Washington, D.C.: May 22, 2025.

Year Recommendations Made: 2025

Recommendations:

- The NTIA Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Office of Spectrum Management to develop an organizational risk management strategy that includes a determination of organizational risk tolerance, acceptable risk assessment methodologies, and details on strategies for responding to risks (such as risk acceptance, mitigation, or avoidance).

- The NTIA Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Office of Spectrum Management to develop an organizational risk assessment that leverages aggregated information from system-level risk assessment results and risk considerations relevant at the organization level.

- The NTIA Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Office of Spectrum Management to fully document identity, credential, and access management procedures for its cloud systems, including identification of authorized users and their roles, and associated access privileges, for each of its spectrum IT legacy systems.

- The NTIA Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Office of Spectrum Management to specify a time frame for developing a data governance plan that resolves conflicts related to the application of NTIA's new data standard and defines roles and responsibilities for making decisions regarding the standard.

Actions Needed: NTIA agreed with these four recommendations. NTIA noted in a May 2025 letter that it will prepare a formal action plan to address these recommendations. NTIA has taken several important actions towards modernizing its major spectrum IT systems, such as defining key requirements for its cloud service provider. However, it has yet to fully develop key planning documentation that would assist it in preparing for the remainder of its modernization.

To fully implement these recommendations, NTIA needs to complete an organization-wide risk management strategy and risk assessment in accordance with guidance from the National Institute of Standards and Technology, document access control procedures for the cloud instances of its systems, and specify a time frame for developing a data governance plan that details responsibilities related to its new data standard. Without fully implementing these practices, NTIA runs the risk of miscommunicating its understanding of its security posture and may face delays in fully implementing its new data standard.

High-Risk Area: Ensuring the Cybersecurity of the Nation, Improving IT Acquisitions and Management

Director: Vijay A. D'Souza, Information Technology and Cybersecurity

Contact Information: dsouzav@gao.gov

Managing Federal Broadband Programs

Broadband Programs: Agencies Need to Further Improve Their Data Quality and Coordination Efforts. GAO-25-107207. Washington, D.C.: April 17, 2025.

Year Recommendation Made: 2025

Recommendation: The NTIA Administrator, in collaboration and agreement with FCC and the U.S. Departments of Agriculture (USDA) and the Treasury, as appropriate, should clearly define and formally document the agencies' broadband funding de-duplication process.

Actions Needed: NTIA agreed with this recommendation. NTIA noted in a March 2025 letter that it will prepare a formal action plan to address this recommendation. To fully implement this recommendation, NTIA needs to establish a formal process for addressing potentially duplicative broadband funding. Clearly agreeing upon and formally documenting written guidance in this area would better position the agencies to sustain their collaboration, manage fragmented federal broadband efforts, and ensure that the considerable federal broadband funding is spent efficiently and effectively.

Director: Andrew Von Ah, Physical Infrastructure

Contact Information: vonaha@gao.gov

Tribal Broadband: Additional Assistance to Recipients Would Better Support Implementation of $3 Billion in Federal Grants. GAO-24-106541. Washington, D.C.: June 24, 2024.

Year Recommendation Made: 2024

Recommendation: The Administrator of NTIA should report to Congress on the resources necessary to ensure the financial sustainability of the Tribal Broadband Connectivity Program (TBCP) infrastructure projects.

Actions Needed: NTIA agreed with this recommendation. In a November 2024 letter, NTIA indicated that during 2025, as more TBCP projects funded during the first round of funding begin construction, the agency will assess the resources needed to ensure the financial sustainability of the TBCP infrastructure projects. NTIA anticipates having the data needed to report to Congress in the fourth quarter of fiscal year 2026.

To fully implement our recommendation, NTIA will need to submit the data on resources needed to Congress for ensuring the financially sustainability of TBCP projects. Tribal recipients of broadband funding would benefit from NTIA outlining the financial sustainability needs to Congress. Without helping to ensure that recipients have achievable financial sustainability plans, NTIA risks the long-term success of its investments in broadband infrastructure.

Director: Andrew Von Ah, Physical Infrastructure

Contact Information: vonaha@gao.gov

Broadband Funding: Stronger Management of Performance and Fraud Risk Needed for Tribal and Public-Private Partnership Grants. GAO-23-105426. Washington, D.C.: January 24, 2023.

Year Recommendation Made: 2023

Recommendation: For TBCP, the Administrator of NTIA should ensure that the dedicated entity to lead fraud risk management activities for the program examines the suitability of existing antifraud controls in the program and prioritizes residual fraud risks.

Actions Needed: NTIA agreed with this recommendation. NTIA indicated that it is developing the Fraud, Waste, and Abuse Framework that will assist in identifying potential risks and vulnerabilities. The framework will provide guidance to establish controls, procedures, and monitoring activities. The framework project is ongoing with a working group coordinating closely on its development. According to NTIA officials, as of April 2025, the Audit and Internal Controls team is revising the fraud risk statements based on feedback from its Risk Management Committee and will redistribute the statements for further comment, with the goal of finalizing them later in 2025. To fully implement our recommendation, NTIA will need to establish the final framework. Without examining its antifraud controls for the program, NTIA lacks assurance that it is sufficiently positioned to combat fraud.

Director: Andrew Von Ah, Physical Infrastructure

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Enclosure 2

Key Information About the Status of GAO Recommendations and Improving Agency Operations

NTIA's Recommendation Implementation Rate

In November 2024, we reported that, on a government-wide basis, 70 percent of our recommendations made 4 years ago were implemented.[7] NTIA's recommendation implementation rate was 75 percent. As of May 2025, NTIA had 35 open recommendations.

Implemented, Closed, and New Priority Recommendations

Our June 2024 letter to Department of Commerce Secretary Raimondo identified three priority recommendations focused on NTIA.[8] Since then, one of those three recommendations was implemented and, in this letter, we identified nine additional priority recommendations.

Implemented recommendation: In November 2024, we confirmed that NTIA implemented our recommendation to clarify and further identify shared goals or outcomes for spectrum-management activities that involve collaboration.[9] Specifically, NTIA issued the National Spectrum Strategy Implementation Plan in March 2024, and agency officials later confirmed how NTIA planned to monitor and track progress. This strategy, developed in consultation with FCC, provides a roadmap for the White House's 2023 National Spectrum Strategy and includes shared spectrum goals and specific outcomes necessary to implement the strategy. NTIA staff also use the Interagency Radio Advisory Committee to coordinate and track spectrum-related proceedings. By identifying shared goals or outcomes with a means to monitor and track progress, NTIA is better positioned to help ensure the U.S. has a unified position in international spectrum conferences and a means for identifying potential improvements.

New priority recommendations: The nine newly identified priority recommendations fall into the Managing Cybersecurity Risks and IT and Managing Federal Broadband Programs areas. (See Enclosure 1.)

High-Risk List

In February 2025, we issued our biennial update to our High-Risk List.[10] This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement. It also identifies the need for transformation to address economy, efficiency, or effectiveness

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[7]GAO, *Performance and Accountability Report: Fiscal Year 2024*, GAO-25-900570 (Washington, D.C.: Nov. 15, 2024).

[8]GAO, *Priority Open Recommendations: Department of Commerce*, GAO-24-107326 (Washington, D.C.: June 5, 2024). We did not issue a separate letter specific to NTIA last year.

[9]GAO, *Spectrum Management: Agencies Should Strengthen Collaborative Mechanisms and Processes to Address Potential Interference*, GAO-21-474 (Washington, D.C.: June 29, 2021).

[10]GAO, *High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, GAO-25-107743 (Washington, D.C.: Feb. 25, 2025).

challenges. Two of our high-risk areas—ensuring the cybersecurity of the nation and improving IT acquisitions and management—are shared among multiple agencies, including NTIA.

Several other government-wide, high-risk areas also have direct implications for NTIA and its operations. These include improving the strategic human capital management and personnel security clearance process and managing federal real property.

In addition to NTIA's high-risk areas, we urge your continued attention to the other government-wide, high-risk issues as they relate to NTIA. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget (OMB), and the leadership and staff in agencies, including within NTIA. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.[11]

Congress's Role on GAO Recommendations

We also recognize the key role Congress plays in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 includes a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.[12]

Congress can use various strategies to address our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on NTIA's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress can follow up during the appropriations process and request periodic updates.

Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress can pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

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[11]GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, GAO-22-105184 (Washington, D.C.: Mar. 3, 2022).

[12]James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), 136 Stat. 2395, 3668 (2022); H.R. Rep. No. 117-389 (2022) (accompanying Legislative Branch Appropriations Act, H.R. 8237, 117th Cong. (2022)).