Broadband Equity Access and Deployment (BEAD) Grant Program

INITIAL PROPOSAL
VOLUME II

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1 Introduction

On behalf of the Governor's Office of Planning and Budget (OPB), the Eligible Entity for the State of Georgia, the Georgia Technology Authority (GTA) is pleased to present this second volume of the Broadband Equity, Access, and Deployment (BEAD) Initial Proposal.

The State reserves the right to update this Initial Proposal pending revised or additional guidance from the National Telecommunications and Information Administration (NTIA).

2 Objectives (Requirement 1)

The State of Georgia seeks to develop a comprehensive, data-driven understanding of its broadband deployment and adoption gaps and to effectively use its available resources and partnerships to narrow those gaps.

The State's BEAD Five-Year Action Plan and this Initial Proposal establish Georgia's broadband goals and priorities.

2.1 Vision

Our vision for a fully connected Georgia is to ensure that every Georgian has reliable and affordable access to the internet along with the necessary tools and skills that unlock opportunities for educational advancement, economic success, job creation, improved health, and strengthened social ties. This will create more connected, resilient, and prosperous communities and cultivate an environment across the state where our citizens and workforce can thrive, our infrastructure can support growth, and our industries can continue to lead the way.

2.2 Goals and objectives

The Georgia Broadband Deployment Initiative (GBDI), established in the 2018 Achieving Connectivity Everywhere (ACE) Act,[1] calls for the promotion and deployment of broadband services throughout the state to unserved areas with a minimum of 25 Mbps download and 3 Mbps upload speeds.[2] Per the establishing statute, "the goal of such program shall be to provide broadband services coverage throughout the entire State."[3]

With that high-level mission as a guide, as well as the high-level objective of addressing access, affordability, equity, and adoption issues, GTA has established the following broadband and digital connectivity goals and objectives:

1. **Ensure comprehensive high-speed internet accessibility**. GTA's goal is to ensure the availability of robust high-speed internet connections for all Georgians, with a particular focus on the populations most affected by limited-service options. GTA plans to collaborate with internet service providers (ISPs), community anchor institutions (CAIs), local government entities, and other reputable organizations to efficiently build out broadband infrastructure to the remaining unserved/underserved locations, to track the

[1] Senate Bill 402, https://www.legis.ga.gov/legislation/52636; enacted through Georgia Code Title 50, Chapter 40, https://broadband.georgia.gov/media/6/download.
[2] "Georgia Broadband Deployment Initiative," DCA, https://broadband.georgia.gov/sites/default/files/documents/georgia-broadband-deployment-initiative.pdf.
[3] GA Code § 50-40-81 (2021).

quality of high-speed internet services and the associated costs to subscribe to services, and to help incentivize the availability of affordable connectivity options.

2. **Empower workforce advancement and economic growth in unserved and underserved communities and population groups through broadband expansion projects.** This will entail deploying funding to improve service in economically distressed areas, incentivizing the participation of small Georgia-based providers in funding programs, and expanding affordable broadband workforce training initiatives across Georgia through a state-led program.

3. **Bolster cybersecurity across state networks, foster a cyber-ready workforce, and establish lasting partnerships for collaborative action.** This will be achieved through the consistent compliance of each state agency and all BEAD-funded networks with the information security policies and standards issued by GTA. With the assistance of its Office of Information Security, GTA will cultivate an environment of modern cybersecurity education, training, research, and practical application for both private and public sectors. This goal encapsulates our overarching pursuit of a secure, informed, and collaborative digital environment.

4. **Reduce obstacles to digital connectivity (equity) and foster an environment conducive to economic growth, academic achievement, and improved healthcare outcomes.** This encompasses the identification and mitigation of technological and economic obstacles to internet access, the promotion of digital literacy programs among all age groups to optimize internet usage benefits, and support for CAIs' digital connectivity programming. To effectively serve impacted communities, GTA commits to assisting these institutions toward having 1 Gbps or faster internet connectivity and being equipped to deliver technology-based training and services, thereby maximizing their transformative impact.

3 Local, Tribal, and regional broadband planning processes (Requirement 2)

This section describes the comprehensive external engagement process GTA conducted in preparation of the BEAD Five-Year Action Plan and this Initial Proposal. The stakeholder engagement effort, comprising statewide meetings and surveys with a complete range of stakeholders, demonstrated collaboration with local and regional entities (governmental and non-governmental). It reflects GTA's effort to facilitate an inclusive and effective engagement model. The stakeholder engagement process also included the covered populations[4] that have been identified as core stakeholder groups.

The external engagement process undertaken while GTA developed this Initial Proposal will be the model for engagement that will be undertaken following submission of the Initial Proposal to support ongoing collaboration with stakeholders throughout the BEAD program.

GTA developed a plan to engage a fully diverse and comprehensive set of stakeholders throughout the State of Georgia through:

1. Email, phone, social media outreach, and printed and electronic flyers,
2. The use of statewide broadband advisory and digital connectivity (i.e., "digital equity" in the IIJA's parlance) advisory committees,
3. In-person public listening sessions in all regions of the state,
4. Virtual facilitated sessions with expert stakeholders on specific topics addressed in the BEAD and Digital Equity Planning Notices of Funding Opportunity (NOFO),
5. A statewide phone survey of Georgia residents regarding internet usage,

[4] Per IIJA Section 60302(8) (Digital Equity Act of 2021), the covered populations are:
1. Individuals who live in covered households (covered household is defined in 60302(7) as "a household, the income of which for the most recently completed year is not more than 150 percent of an amount equal to the poverty level, as determined by using criteria of poverty established by the Bureau of the Census");
2. Aging individuals (defined with reference to 42 U.S.C. 3002(40) as individuals who are 60 years of age or older);
3. Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
4. Veterans;
5. Individuals with disabilities;
6. Individuals with a language barrier, including individuals who—
   a. Are English learners; and
   b. Have low levels of literacy;
7. Individuals who are members of a racial or ethnic minority group; and
8. Individuals who primarily reside in a rural area.

6. The use of surveys and asset inventories to obtain required information and expert input from stakeholder organizations,

7. Ongoing virtual and in-person meetings with stakeholder groups throughout the state,

8. Coordination with partners in the Affordable Connectivity Program (ACP) and other digital connectivity program outreach, and

9. Participating in statewide conferences related to broadband and digital connectivity, outreach conducted by NTIA in Georgia, and regional and national conferences regarding broadband and digital connectivity.

GTA has acted successfully on all aspects of this outreach and engagement plan.

GTA began its stakeholder engagement upon release of the BEAD and Digital Equity planning NOFOs by coordinating a meeting with the Broadband Advisory Committee. Engagement efforts will continue throughout the planning, deployment, and project oversight cycles of the BEAD and Digital Equity planning and Digital Capacity grant programs.

Through its wide range of stakeholder engagement efforts throughout 2023 and ongoing, GTA has reached the following covered and underrepresented populations, including low-income households, aging individuals, incarcerated individuals, veterans, individuals with disabilities, individuals who are members of a racial or ethnic minority group, individuals with a language barrier, including individuals who are English learners and have low levels of literacy, and individuals who primarily reside in a rural area.

Details of GTA's public and stakeholder outreach and engagement include:

1. Email, telephone, social media outreach, and printed and electronic flyers

    a. Development of extensive stakeholder organization lists; notifying stakeholders about GTA and partner-coordinated ACP campaigns; and inviting stakeholders to participate in regional public listening sessions, developed and distributed flyers on the BEAD and Digital Connectivity programs, FCC Map Challenge, and surveys; virtual facilitated sessions, one-on-one and small group meetings, and data collection efforts.

    b. The GTA email list has 2,663 subscribers and a 37 percent open rate for emails. This list will continue to be used and expanded for communications throughout the life of BEAD and Digital Connectivity programs. Eventbrite was used for event RSVP tracking, but electronic registration was not required.

2. Statewide advisory committees

    a. Broadband Advisory Committee – established in 2020, meets quarterly.

    b. Digital Connectivity Advisory Committee – established in January 2023 to identify needs and gaps of digital connectivity in Georgia and to support the State's digital connectivity planning and capacity development. The 30 members were selected per NDIA and NTIA guidance based on proximity to covered populations. Members are subject matter experts in their professional area or discipline and experienced and knowledgeable regarding the covered populations they serve. The committee's first meeting was held in February 2023, and meetings are held monthly and will continue throughout the life of the program.

3. 31 community engagement sessions throughout the state beginning in late winter 2022 with the purpose of sharing information about broadband and digital connectivity programs and funding and hearing directly from members of the public, organizations, and community leaders regarding individuals' and communities' needs and challenges in accessing and using the internet.

    a. 25 in-person "Let's Connect Georgia" sessions from February through June 2023 across the state's 12 regional commissions.

    b. Six virtual or audio sessions focused on covered populations and representative stakeholder organizations.

    c. Participants included state, county, and municipal government officials; regional planning commissions; technical colleges; universities; internet service providers (ISPs); industry, civic, and governance associations; local schools; regional and local libraries; regional and local housing authorities; regional and local nonprofits; digital connectivity organizations; organizations serving covered populations; and private citizens.

4. Virtual sessions with expert stakeholders from companies, governments, and organizations, including those representing covered and underrepresented populations:

    a. Workforce development organizations – including state agencies, technical colleges, workforce training organizations, labor unions, OFS (a fiber manufacturer), the Fiber Broadband Association, the Fiber Optic Association, and ISPs. (3 sessions – over 60 participants)

b. ISPs – including Georgia Cable Association members, Georgia's Rural Telephone and Broadband Association members, the Georgia Electric Membership Corporation and member cooperatives, and other independent ISPs. (5 sessions – more than 100 participants)

c. Local and regional governments – including regional planning commissions, state government officials, county government officials, and municipal government officials. (2 sessions – nearly 70 participants)

d. CAIs – including state, county, and municipal governments and education leaders; and digital connectivity organizations providing access to computing devices, digital literacy and financial training, and health-related services. (4 sessions – over 20 participants)

5. Individual meetings with organizations

   a. In addition to virtual sessions, GTA has conducted, and will continue to conduct during the life of the program, one-on-one and small group meetings with a range of broadband and digital connectivity stakeholders, including those representing covered populations:

      i. Health support organizations

      ii. Workforce organizations

      iii. Unincorporated communities

      iv. Historically Black Colleges and Universities (HBCU)

      v. State and regional library systems

      vi. Digital skills training organizations

      vii. Device distribution organizations

      viii. Accessibility organizations

      ix. Business organizations

      x. Arts and culture and arts education organizations

      xi. Faith-based organizations

      xii. Youth and family serving organizations

xiii. K-12 educators and technologists

xiv. Financial services organizations and coalitions

xv. Philanthropic organizations

6. Speaking at statewide conferences and organization meetings in 2023
    a. Atlanta Digital Connections Symposium – March 2023
    b. Statewide Accessibility Conference – March 2023
    c. Family Connections of Partnerships Georgia – April 2023
    d. Georgia Association of Regional Commissions Monthly Meeting – April 2023
    e. National Summit on State Planning for Digital Equity and Economic Inclusion – April 2023
    f. National Coalition of Adult Basic Education Conference – April 2023
    g. AARP statewide Tele-Town Hall – May 2023
    h. Fiber Network Alliance Conference – May 2023
    i. Southern Georgia Regional Commission Council Meeting – May 2023
    j. Atlanta Black Chamber of Commerce – May 2023
    k. Georgia's Rural Telephone and Broadband Association Conference – June 2023
    l. Georgia Municipal Association Small Cities Conference – August 2023
    m. Georgia's Rural Telephone and Broadband Association Fall Board Meeting – October 2023
    n. Statewide Digital Connectivity Symposium hosted by GTA – November 2023
7. The Internet access and usage phone survey was conducted with Georgia residents during April – May 2023
    a. The phone survey yielded 1,555 responses from residents of Georgia. Survey responses, in analysis, were weighted by the respondent's region, household income, age, and ethnicity to correct for potential bias since lower-income

households, racial or ethnic minority populations, and younger individuals were less likely to respond.

8. Stakeholder surveys and asset inventories, which were promoted to stakeholder organizations through the GTA website.

    a. Workforce Development—what organizations are doing to provide or facilitate training for jobs in broadband-related fields.

    b. Digital connectivity programs—organizations' digital connectivity programs, plans, and coalitions to provide community members the skills and tools for participating in broadband-related opportunities.

    c. CAIs—what community institutions and organizations are doing to advance Georgians' opportunities to use broadband to work, learn, receive health care, and participate in civic events.

    d. Agency asset inventory—infrastructure-related assets that a government entity owns or manages (conduit, fiber, structures, real estate, poles, etc.) and broadband-related workforce development efforts in place.

    e. Covered population barriers—identifies unique obstacles to broadband access faced by vulnerable populations an organization serves.

    f. Internet service providers—identifies recruiting and hiring for broadband-related positions, broadband development strategies, and collaboration with communities to close the digital divide.

    g. Distribution and promotion

        i. Surveys and inventory tools were posted on GTA's website and made available to all stakeholders by March 24, 2023. ISP and Workforce Development surveys were made available in late February 2023. This data was included in the Digital Connectivity Plan.

        ii. Stakeholders were notified in public listening sessions, virtual stakeholder sessions, one-on-one meetings, and through printed flyers that were distributed at in-person meetings and electronically through email. Not all surveys apply to each organization, but an organization may be able to complete more than one survey, depending on the organization's role, mission, and the services it provides.

iii. Data collection will continue at least through completion of the State of Georgia BEAD Initial Proposal.

9. Other communications outreach GTA has conducted, including traditional and social media campaigns:

    a. ACP outreach and training. On May 18th, GTA distributed a press release and garnered support from over 100 partners. The campaign utilized digital and print outreach channels to directly raise awareness about the ACP among households, and provide outreach resources to local governments, community-based organizations, and trusted institutions. The goal was to reach unconnected Georgians and ensure they have access to the benefits of the ACP.

    b. GTA conducted a two-week enrollment specialist drive to equip community leaders and their staff with the necessary knowledge to assist others in enrolling for the ACP and subscribing to high-speed home internet plans. Participants completed free virtual training sessions and became certified ACP enrollment specialists. GTA also participated in the Online for All campaign where the agency continued outreach efforts to promote the ACP alongside hundreds of other organizations across the country during June 14-June 22.

    c. FCC challenges—involving individuals and communities.

3.1 Full geographic coverage

From February through June 2023, GTA conducted 25 public listening sessions in 21 counties throughout the state with at least one in each of the state's 12 regional commission districts. Each session attracted an average of 20 people. It also conducted six virtual or audio sessions focused on covered populations and representative stakeholder organizations around the state (Appendix D).

Understanding the importance of ongoing stakeholder engagement throughout the life of the program, GTA adopted an inclusive approach. In addition to scheduling additional public meetings as necessary, GTA implemented a 30-day public comment period. This offers stakeholders an open platform to voice their opinions, concerns, and suggestions about the program. Insights gathered from the public comment period were reviewed and used as crucial input to identify areas of improvement, align strategies more closely with stakeholder needs, and continuously refine and strengthen the program.

Additionally, GTA made it easier for community members to include the agency directly in their discussions. A form on the GTA website enables community members to extend invitations to in-

person or virtual meetings. These meetings are an opportunity for GTA to directly address topics related to the agency's broadband, digital connectivity, and other programs, and to hear concerns first-hand.

Through these measures, GTA keeps stakeholders updated on the BEAD program's progress and fosters an environment of transparency and collaborative dialogue, ensuring that plans are tailored to the evolving needs and expectations of the community.

GTA coordinated its outreach to communities around the state with local cities and counties, the Georgia Municipal Association, the Association of County Commissions of Georgia, the Georgia Public Library System, and the state's 12 Regional Commissions.

The goals of the public listening sessions, which were typically two hours in length, were two-fold. First, information was shared with community leaders, community-based organizations, and the public about 1) foundational broadband technology concepts and terminology, 2) federal BEAD and Digital Equity and other funded broadband programs, and 3) opportunities for individuals to act (for example, signing up for ACP and submitting FCC map challenges if relevant to them) and how communities can support state broadband and digital connectivity planning efforts. The second purpose of these sessions was to hear from community leaders and members about their challenges and experiences both as individuals and as representatives of organizations serving constituents and covered populations in the community.

Specific information shared by GTA in each of these sessions included a broadband technology overview; a description of BEAD and Digital Equity program requirements, funding, and timelines; a description of current state broadband and digital connectivity efforts; and details on ACP and FCC map challenge processes.

Example questions posed to attendees during these sessions included:

1. What strengths and opportunities do you see in your community regarding the following principal areas of digital connectivity: access and using the internet, accessing a computer, digital skills training and technical support, engaging with online content (particularly with government services), and community organizations that support digital connectivity?

2. What concerns are being raised about broadband and connectivity efforts across your constituency?

3. What is the current state of internet service provider relationships? What concerns or issues are being discussed?

4. What opportunities do you see for the state's broadband and digital connectivity programs to support advancing workforce initiatives?

5. What resources and guidance are needed for the future?

6. What is the primary driver of the digital divide within your community?

7. What resources are needed to support connectivity programs among underrepresented populations, including ethnic communities and lower-income areas (e.g., staffing, meeting space, curriculum, devices, funding, etc.)?

8. With current workforce shortages, do you currently have sufficient staff with the capacity and technical skills to implement connectivity programs?

GTA also conducted surveys at the sessions, which respondents could take either on paper or via a phone app. GTA received 75 survey responses out of a total of approximately 300 people who attended the public sessions. (See Appendix G for findings.)

3.2 Meaningful engagement and outreach to diverse stakeholder groups

GTA reached out to a wide range of diverse stakeholder groups that included all covered populations in the Digital Equity NOFO and all underrepresented populations and stakeholder groups identified in the BEAD NOFO. GTA utilized in-person public listening sessions, virtual expert stakeholder sessions, one-on-one engagements, email campaigns, social media notifications, flyers, and statewide and regional conference platforms.

At each stage of planning and engagement, several strategies were implemented to ensure that the state's broadband goals are inclusive and feedback-driven:

1. GTA initiated its digital connectivity strategy for stakeholder engagement by hiring a Digital Connectivity Manager to lead the planning process.

2. GTA engaged with the state's digital connectivity stakeholder organizations to establish a 30-member, statewide Digital Connectivity Advisory Committee. The Committee includes organizations that represent covered populations, state agencies, universities, faith-based organizations, civil rights organizations, housing authorities, internet service providers, and civic organizations. The Committee will continue to meet and advise GTA throughout the life of the BEAD and Digital Connectivity programs.

3. GTA considered participants' level of familiarity with broadband to best enable the public and stakeholders to make informed insights about their and their constituents' broadband and digital connectivity needs. GTA provided custom overviews of the history,

use, and technology of broadband ("Broadband 101"). Additionally, GTA reviewed the major broadband initiatives and funding opportunities for both infrastructure and digital connectivity made available through BEAD.

4. GTA developed and distributed printed and online surveys to better understand:
    a. The barriers and obstacles to broadband access faced by individuals and the vulnerable populations these organizations serve.
    b. Individuals' and organizations' ability to access broadband and how that enables them to achieve their mission and goals.
5. GTA developed an inventory tool and distributed it to stakeholders to collect statewide data about stakeholders' existing digital connectivity program assets, plans, and coalitions and to measure current organizational capacity. GTA anticipates growing this information base through ongoing engagement with stakeholders throughout the life of the program.

When engaging the public, GTA took specific steps to collect meaningful data on covered populations. Public engagements were held in person at local community anchor institutions to encourage community participation by hosting events in locations that are both familiar and accessible. GTA also made itself available to attend additional organization and community meetings in all parts of the state on a requested basis.

GTA also developed a resident survey to assess the needs and barriers of the public. The survey's sampling strategy enabled the State to make meaningful estimates for each covered population.

3.3 Multiple awareness and participation mechanisms

GTA conducted public in-person, virtual, one-on-one, and small group meetings with stakeholders. GTA also attended statewide and regional conferences.

GTA maintains a robust email contact list of every person who was invited to or attended any of its engagements.

GTA conducts outreach via email, GTA's website, printed and electronic flyers, press releases, and social media channels through its own mechanisms and in coordination with partner agencies, including the Georgia Public Library System.

3.4 Clear procedures to ensure transparency

GTA took significant steps to ensure compliance with all applicable laws and best practices to maintain standardized and transparent procedures.

All public in-person meetings were listed on publicly available state and regional government sites, including Eventbrite, GTA's website, Georgia.gov, and regional county websites. GTA's website contains up-to-date, thorough, and accessible information about broadband, GTA's mission, and ways that the public and stakeholders can get involved in digital connectivity efforts. GTA's website also hosted all stakeholder surveys so that those unable to attend the stakeholder meetings could provide insight and feedback. Information from the stakeholder surveys was used in the planning process and was incorporated into the BEAD Five-Year Action Plan and Digital Connectivity Plan. Key findings from the stakeholder surveys were shared with the Digital Connectivity Advisory Committee and results were included in the Digital Connectivity Plan.

In developing its email contact lists for public in-person meetings, GTA consulted the Georgia Municipal Association, the Association County Commissions of Georgia, the Technical College System of Georgia, the Georgia Department of Community Affairs, the Georgia Department of Education, the University of Georgia Cooperative Extension Office, Family Connections Partnerships and other statewide organizations with stakeholder networks.

Contact information was collected from online event registration. Although participants were not obligated to provide their actual name or email, the intent to include the participants in future stakeholder outreach efforts was clearly communicated during meetings. To facilitate feedback and ensure transparency, registered participants received a copy of the virtual stakeholder presentation slide deck after the meeting. The Digital Connectivity public listening sessions meeting slide deck was also made available on the GTA website for the public to access.

3.5 Outreach and engagement of unserved and underserved communities

GTA proactively contacted and engaged representatives of and organizations that serve unserved and underserved communities utilizing the following strategies:

1. GTA initiated the digital connectivity planning process by identifying and engaging with the state's regional stakeholder organizations. These engagements informed the development of the statewide Digital Connectivity Advisory Committee, a 30-member group that includes organizations that represent covered populations as well as state agencies, universities, faith-based organizations, civil rights organizations, housing authorities, service providers, and civic associations.

2. Covered populations received particular focus in the resident survey, which informed a needs assessment and barriers analysis. The sampling strategy was designed to provide meaningful estimates and insights for each covered population to inform how GTA can best serve these populations.

3. As part of the in-person Digital Connectivity public listening sessions, GTA engaged difficult-to-reach communities by hosting a session at the Georgia Public Library System Accessibility Conference.

4. GTA developed and distributed two online inventory tools: the first allowed stakeholder organizations to provide data about their organizational capacity, digital connectivity program assets, plans, and coalitions; the second aimed to better understand the barriers and obstacles to broadband access faced by vulnerable and covered populations and the organizations that serve them. The tools were hosted publicly online to make them widely available and easily accessible, with the goal of enabling populations that may be historically underrepresented to express their goals, barriers, and plans easily and efficiently.

5. GTA additionally engaged underserved and unserved communities by making information and materials from stakeholder engagements easily available. Registered participants received a copy of the virtual stakeholder presentation slide deck, and the Digital Connectivity Public Listening meeting slide decks were available publicly.

4 Local coordination (Requirement 4)

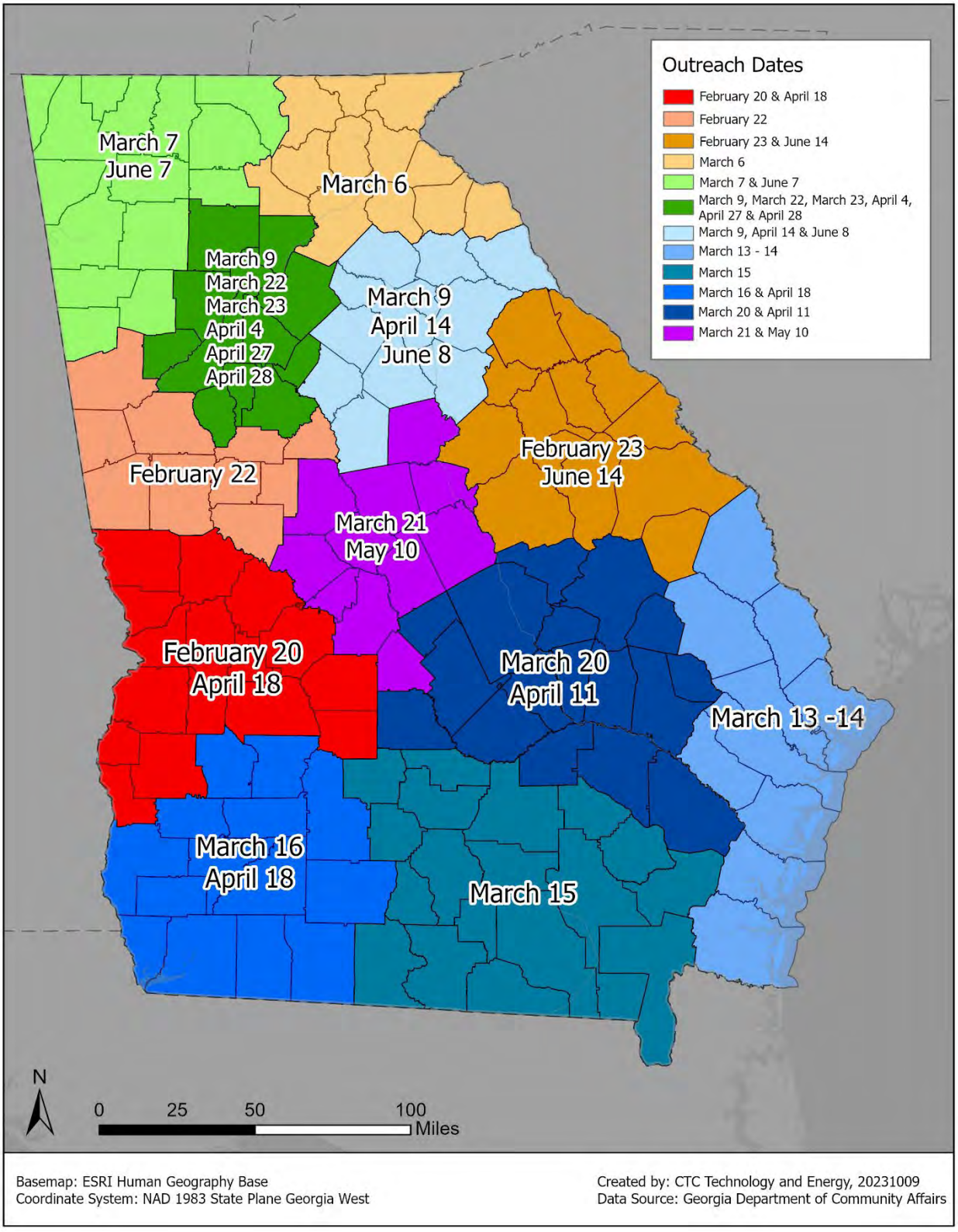
This section describes how GTA has coordinated and will continue to coordinate with all communities within its jurisdiction, including its marginalized and underrepresented populations.

The Local Coordination Tracker Tool is attached as Appendix A.

4.1 Full geographic coverage (local coordination criterion 1)

From February through June 2023, GTA conducted 25 public in-person listening sessions in 21 counties throughout the state with at least one in each of the state's 12 regional commission districts. Each session attracted an average of 20 people. It also conducted six virtual or audio sessions focused on covered populations and representative stakeholder organizations around the state. (Appendix D and Figure 1, below).

Figure 1: GTA's public listening sessions



GTA adopted an inclusive approach given the importance of ongoing stakeholder engagement throughout the life of this program. In addition to scheduling additional public meetings as necessary, GTA provided a 30-day public comment period to gain feedback on this Proposal which offered stakeholders an open platform to voice their opinions, concerns, and suggestions about the program. Insights gathered from the public comment period were then reviewed and used as crucial input to identify areas of improvement, align strategies more closely with stakeholder needs, and continuously refine and strengthen the program.

Additionally, GTA made it easier for community members to include the agency directly in their discussions. A form on the GTA website enabled community members to extend invitations to in-person or virtual meetings. These meetings provided an opportunity for GTA to directly address topics related to the agency's broadband, digital connectivity, and other programs, and to hear concerns first-hand.

Through these measures, GTA keeps stakeholders updated on the BEAD program's progress and fosters an environment of transparency and collaborative dialogue, ensuring that plans are tailored to the evolving needs and expectations of the community.

GTA coordinated its outreach to communities around the state with local cities and counties, the Georgia Municipal Association, the Association of County Commissions of Georgia, the Georgia Public Library System, and the state's 12 Regional Commissions.

The goals of the public listening sessions, which were typically two hours in length, were two-fold. First, information was shared with community leaders, community-based organizations, and the public about 1) foundational broadband technology concepts and terminology, 2) federal BEAD and Digital Equity and other funded broadband programs, and 3) opportunities for individuals to act (for example, signing up for ACP and submitting FCC map challenges if relevant to them) and how communities can support state broadband and digital connectivity planning efforts. The second purpose of these sessions was to hear from community leaders and members about their challenges and experiences both as individuals and as representatives of organizations serving constituents and covered populations in the community.

Specific information shared by GTA in each of these sessions included a broadband technology overview; a description of BEAD and Digital Equity program requirements, funding, and timelines; a description of current state broadband and digital connectivity efforts; and details on ACP and FCC map challenge processes.

Example questions posed to attendees during these sessions included:

1. What strengths and opportunities do you see in your community regarding the following principal areas of digital connectivity: access and using the internet, accessing a computer, digital skills training and technical support, engaging with online content (particularly with government services), and community organizations that support digital connectivity?

2. What concerns are being raised about broadband and connectivity efforts across your constituency?

3. What is the current state of internet service provider relationships? What concerns or issues are being discussed?

4. What opportunities do you see for the state's broadband and digital connectivity programs to support advancing workforce initiatives?

5. What resources and guidance are needed for the future?

6. What is the primary driver of the digital divide within your community?

7. What resources are needed to support connectivity programs among underrepresented populations, including ethnic communities and lower-income areas (e.g., staffing, meeting space, curriculum, devices, funding, etc.)?

8. With current workforce shortages, do you currently have sufficient staff with the capacity and technical skills to implement connectivity programs?

GTA also conducted surveys at the sessions, which respondents could take either on paper or via a phone app. GTA received 75 survey responses out of a total of approximately 300 people who attended the public sessions. (See Appendix G for findings.)

4.2 Meaningful engagement and outreach to diverse stakeholder groups (local coordination criterion 2)

GTA reached out to a wide range of diverse stakeholder groups that included all covered populations in the Digital Equity NOFO and all underrepresented populations and stakeholder groups identified in the BEAD NOFO. GTA utilized in-person public listening sessions, virtual expert stakeholder sessions, one-on-one engagements, email campaigns, social media notifications, flyers, and statewide and regional conference platforms.

At each stage of planning and engagement, several strategies were implemented to ensure that the state's broadband goals are inclusive and feedback-driven:

1. GTA initiated its digital connectivity strategy for stakeholder engagement by hiring a Digital Connectivity Manager to lead the planning process.

2. GTA engaged with the state's digital connectivity stakeholder organizations to establish a 30-member, statewide Digital Connectivity Advisory Committee. The Committee includes organizations that represent covered populations, state agencies, universities, faith-based organizations, civil rights organizations, housing authorities, internet service providers, and civic organizations.

3. GTA considered participants' level of familiarity with broadband to best enable the public and stakeholders to make informed insights about their and their constituents' broadband and digital connectivity needs. GTA provided custom overviews of the history, use, and technology of broadband ("Broadband 101"). Additionally, GTA reviewed the major broadband initiatives and funding opportunities for both infrastructure and digital connectivity made available through BEAD.

4. GTA developed and distributed printed and online surveys to better understand:

    a. The barriers and obstacles to broadband access faced by individuals and the vulnerable populations these organizations serve.

    b. Individuals' and organizations' ability to access broadband and how that enables them to achieve their mission and goals.

5. GTA developed an inventory tool and distributed it to stakeholders to collect statewide data about stakeholders' existing digital connectivity program assets, plans, and coalitions and to measure current organizational capacity.

When engaging the public, GTA took specific steps to collect meaningful data on covered populations. Public engagements were held in person at local community anchor institutions to encourage community participation by hosting events in locations that are both familiar and accessible. GTA also made itself available to attend additional organization and community meetings in all parts of the state on a requested basis.

GTA also developed a resident survey to assess the needs and barriers of the public. The sampling strategy enabled the State to make meaningful estimates for each covered population.

4.3 Multiple awareness and participation mechanisms (local coordination criterion 3)

GTA conducted public in-person, virtual, one-on-one, and small group meetings with stakeholders. GTA also attended statewide and regional conferences.

GTA maintains a robust email contact list of every person who was invited to or attended any of its engagements.

GTA conducts outreach via email, GTA's website, printed and electronic flyers, press releases, and social media channels through its own mechanisms and in coordination with partner agencies, including the Georgia Public Library System.

4.4 Clear procedures to ensure transparency (local coordination criterion 4)

GTA took significant steps to ensure compliance with all applicable laws and best practices to maintain standardized and transparent procedures.

All public in-person meetings were listed on publicly available state and regional government sites, including Eventbrite, GTA's website, Georgia.gov, and regional county websites. GTA's website contains up-to-date, thorough, and accessible information about broadband, GTA's mission, and ways that the public and stakeholders can get involved in digital connectivity efforts. GTA's website also hosted all stakeholder surveys so that those unable to attend the stakeholder meetings could provide insight and feedback.

In developing its email contact lists for public in-person meetings, GTA consulted the Georgia Municipal Association, the Association County Commissions of Georgia, the Technical College System of Georgia, the Georgia Department of Community Affairs, the Georgia Department of Education, the University of Georgia Cooperative Extension Office, Family Connections Partnerships and other statewide organizations with stakeholder networks.

Contact information was collected from online event registration. Although participants were not obligated to provide their actual name or email, the intent to include the participants in future stakeholder outreach efforts was clearly communicated during meetings. To facilitate feedback and ensure transparency, registered participants received a copy of the virtual stakeholder presentation slide deck after the meeting. GTA also made the Digital Connectivity public listening sessions meeting slide deck available on its website for the public to access.

4.5 Outreach and engagement of unserved and underserved communities (local coordination criterion 5)

GTA proactively contacted and engaged representatives of and organizations that serve unserved and underserved communities utilizing the following strategies:

1. GTA initiated the digital connectivity planning process by identifying and engaging with the state's regional stakeholder organizations. These engagements informed the development of the statewide Digital Connectivity Advisory Committee, a 30-member group that includes organizations that represent covered populations as well as state

agencies, universities, faith-based organizations, civil rights organizations, housing authorities, service providers, and civic associations.

2. Covered populations received particular focus in the resident survey, which informed a needs assessment and barriers analysis. The sampling strategy was designed to provide meaningful estimates and insights for each covered population to inform how GTA can best serve these populations.

3. As part of the in-person Digital Connectivity public listening sessions, GTA engaged difficult-to-reach communities by hosting a session at the Georgia Public Library System Accessibility Conference.

4. GTA developed and distributed two online inventory tools: the first allowed stakeholder organizations to provide data about their organizational capacity, digital connectivity program assets, plans, and coalitions; the second aimed to better understand the barriers and obstacles to broadband access faced by vulnerable and covered populations and the organizations that serve them. The tools were hosted publicly online to make them widely available and easily accessible, with the goal of enabling populations that may be historically underrepresented to express their goals, barriers, and plans easily and efficiently.

5. GTA additionally engaged underserved and unserved communities by making information and materials from stakeholder engagements easily available. Registered participants received a copy of the virtual stakeholder presentation slide deck, and the Digital Connectivity Public Listening meeting slide decks were available publicly.

5 Deployment subgrantee selection (Requirement 8)

This section of Volume II describes in detail how GTA proposes to structure, design, and implement its grant program to award BEAD funds to subgrantees to deploy broadband infrastructure in Georgia. This section includes extensive discussion of the structure of the program, the timeline, the scoring, and steps GTA will take to seek to maximize the reach and impact of the BEAD funds throughout Georgia. See Appendix H for a detailed chart summarizing the subgrantee selection process described in this section, including the documentation, milestones, and phases required in the process.

GTA developed this subgrantee selection process to meet both NTIA's requirements and the State's goals. While every effort has been made to propose scoring criteria and requirements that will enable GTA to make awards to subgrantees for projects that will maximize the impact of the BEAD funding and other resources the State may commit to the BEAD program, GTA also recognizes that this grant program, like any such program, will not have guaranteed outcomes. For example, some areas may not attract any applicants, or may attract only one applicant. Further, the BEAD program breaks new ground and is experimental in that no entity, state or federal, has ever been required to design a program that would address the needs of 100 percent of eligible locations.

5.1 Deployment subgrantee selection process

The subgrantee selection process described below is designed to be fair and to avoid arbitrary decisions. It does this through a detailed description of selection rules and procedures, discussion of application of fair and consistent rules to all applicants, and to the extent possible, definition of quantitative scoring methods that minimize subjective judgement in grant decisions. The process and rules proposed below include such protections as requirements that selection officers will certify that they do not have conflicts of interest and that they will apply grant rules fairly and without bias.

5.1.1 Principles

The State of Georgia intends to use the capabilities and structures it has developed for pre-BEAD programs to inform, to the greatest extent possible, the BEAD deployment subgrantee selection process in a way that is fair, open, and competitive. All elements of the BEAD program have been designed with these goals at the forefront, as well as GTA's related BEAD design principles:

- Impact
    - Grant strategy should seek to make limited funds reach as far as possible.

  - Fiber-to-the-premises should be prioritized and funded to every financially feasible unserved and underserved location.
  - Process and requirements should make prudent use of public funds through rigorous review and qualification of applications.

- Simplicity and widespread participation
  - The process should be designed to encourage maximum participation by eligible applicants including smaller and local applicants.
  - The program, from design to final execution of grant agreements, should limit burdens on applicants and enable efficient applicant participation.
  - The program design should also enable efficient grant program administration while accounting for BEAD's complexity.

- Openness, fairness, and competition
  - The process should reflect the key goals of enabling participation through openness, sharing of information, fairness, and commitment to competition.
  - All elements of grant strategy, including geographic units for proposals, should be designed to increase the potential for competition among applicants statewide and in specific areas.

Openness represents a core value and guiding principle for GTA as it undertakes both the BEAD program and other broadband and digital connectivity initiatives. Openness is crucial to ensure the best outcomes for unserved and underserved communities and will involve a range of strategies:

1. Open and inclusive eligibility for grant awards, welcoming applications from both public and private entities, as well as collaborations and public–private partnerships.
2. Community input at all stages of the BEAD process, including through engagement and feedback to the planning process and the plans themselves.
3. Openness and transparency in the evaluation process, with feedback to unsuccessful applicants to build trust and encourage participation.

Fairness for internet service provider applicants in a competitive grant program for building broadband infrastructure is essential to encourage competition, innovation, and the efficient use

of resources while ensuring that underserved areas receive the connectivity they need. To ensure fairness in its BEAD grant process, GTA anticipates the following:

1. Open and transparent process, with all grant materials and guidance available to all potential applicants on the same timeline, including publication of the scoring rubric.
2. Ongoing and frequent communications through public means such as program notices, grant workshops, technical assistance, and frequently updated FAQs, to enable maximum information sharing with potential applicants.
3. Inclusive eligibility criteria that are clear, comprehensive, and not overly restrictive, within the parameters of the BEAD program, to ensure that entities of all sizes, both public and private, can participate.
4. Transparent scoring criteria.
5. Competitive process that encourages applicants to submit innovative proposals and cost-effective solutions.
6. Fair review process that is impartial and free from conflicts of interest, with a range of expert evaluators engaged to assess proposals, consistent with Georgia's past broadband grant programs. To ensure against risks of bias, collusion, conflict of interest, and self-dealing, GTA will ensure that all reviewers are entirely financially independent of all applicants. Reviewers will be required to certify in writing that they have no employment, contractor, or other business relationship with any applicant or any affiliate or subsidiary of any applicant.

Competition is at the heart of GTA's goals, methodology, and commitments. Creating a competitive environment for the BEAD grant program will be ensured through multiple means:

1. Broad eligibility and participation, including of electric utilities, and a full range of non-profit and for-profit private entities.
2. A program designed to make it feasible for all sizes of entities to compete without facing unreasonable costs or level of effort.

5.1.2 Technical assistance and administrative support

To support openness, fairness, and competition in its BEAD grant efforts, GTA plans extensive communications, technical assistance, and administrative support for applicants throughout the process. GTA will leverage its vast experience in grant administration and existing program framework to provide technical assistance resources and administrative support during the

subgrantee selection process for its BEAD grant funding program. GTA will use its existing communications channels to provide all partners in the state with the most accurate and up-to-date information regarding key deadlines and milestones for its BEAD program. GTA's outreach processes and technical assistance materials will provide guidance, templates, and information about each of the subgrantee selection process elements discussed below.

GTA has an extensive email list of stakeholders, including service providers, local governments, community anchor institutions, state agencies, and nonprofit organizations. GTA also has a robust web and social media presence. GTA will use these tools to alert potential applicants of each milestone during the process outlined below as well as providing information on technical assistance opportunities or updated information about program requirements. GTA will encourage its partners to further distribute information about the BEAD program through their own email lists and website postings. GTA will also leverage its website as a repository for potential applicants to access detailed application materials and technical assistance resources.

GTA expects to implement the following process for its BEAD grant funded outreach and communications:

- GTA plans to announce the dates of its grant program at least 10 days prior to the opening of the window or acceptance of applications.
- On the same day as the announcement of application dates, GTA plans to make BEAD application materials available on its website using a dedicated webpage. These materials will consist of an Application and Guide, Program Guide, and Frequently Asked Questions (FAQ) documents. GTA will provide an additional resources page on its website to direct potential applicants to third party resources that may be of use, including those provided by NTIA, NIST, FCC, and others.
- GTA plans to conduct an online application workshop within 2 business days of the grant window opening. This workshop will provide general instructions, discuss the program's goals and objectives, map out major program milestones, answer questions, and provide other technical assistance. This workshop will be recorded and available on the GTA website and the FAQ document will be updated to reflect questions and answers from the workshop.
- GTA plans to have a dedicated email address available for applicants to use to ask questions and request technical assistance. To provide transparency, fairness, and additional technical assistance, GTA will update its FAQ document on a regular basis

with the questions and answers generated by the email inquiries and in-person meetings.

- GTA plans to, throughout the process, use all available communication channels to update applicants on milestones, deadlines, updated FAQ material, and technical assistance resources as they are made available by GTA, OPB, NTIA, NIST, FCC, or other relevant partners.

5.1.3 Overview of planned Subgrantee Selection Process

The following is GTA's planned Subgrantee Selection Process, which is part of GTA's larger plan for ensuring broadband for locations that are currently unserved and underserved.

GTA anticipates a multi-step process for selecting subgrantees for its BEAD funds that will (1) allow for receipt and scoring of grant applications for fiber-to-the-premises (hereinafter referred to as the Scoring Phase), and (2) then proceed to negotiations with applicants (hereinafter referred to as the Negotiation Phase).

As it did in 2022 with its successful Capital Project Fund (CPF) grant program, Georgia anticipates offering applicants the opportunity to apply for project areas at the county level, such that all applications will be required to propose to build to unserved and underserved addresses countywide (each county and its eligible locations will hereinafter be referred to as "County Grant Area").

This approach is designed to enable efficient application review with minimal application overlap or need for deconfliction. Additionally, this approach is designed to enable participation by applicants of all sizes, given that Georgia's many counties are small relative to most states and their size should not pose a barrier to participation by smaller entities. Establishing application areas at the county level is further supported by the state's successful experience with this approach for CPF and the enthusiastic participation in that program by eligible applicants of all sizes.

Additionally, to allow for more flexibility regarding County Grant Areas, GTA will allow applicants the option to partner with other applicants to apply for a County Grant Area. If applicants choose to form a partnership, details of the partnership must be clearly outlined in the prospective subgrantees' applications at the time of submission. Each applicant partnering will submit an individual application detailing their prospective specific project area(s) and proposed BSLs within the county and reference the other project(s) and applicant(s) working to serve locations in such a way that a comprehensive plan is formulated to solve broadband for the county in which they applied.

Consistent with NTIA's preferences, GTA anticipates a focus and prioritization of its grant program on fiber. GTA anticipates running a first-round application process with a goal of funding applications that address both unserved and underserved locations in all County Grant Areas. Following review of the applications, GTA may at that point choose, at its discretion, to run a subsequent grant round that may allow for additional applications if necessary. However, if GTA is satisfied with the outcome of the first-round applications, it may elect not to proceed to a second round of applications.

Georgia seeks to maximize the use of its BEAD allocation to fund fiber-to-the-premises, reflecting the State's commitment to deploying best-in-class, future-proof broadband infrastructure wherever possible and to the greatest extent possible.

GTA generated a sophisticated and rigorous cost estimation tool to model deployment and operational costs of constructing fiber and other technologies in the State. GTA's analysis is that, so long as an adequate competitive dynamic is created for the application process, BEAD funds may be sufficient to fund fiber-to-the-premises to most unserved and underserved locations in Georgia based on the economics of fiber deployment and operations and the financial contributions that applicants are projected to commit, through match and other funds. Stated otherwise, using its own cost modeling tool, GTA's data suggests Georgia's BEAD allocation could serve approximately 98 percent of unserved and underserved locations with fiber. This analysis reflects GTA's calculation of how much applicants will commit, given likely financial returns, for each unserved and underserved location. GTA further believes that increasing the process's competitive nature may elicit applications from potential subgrantees for the most unserved and underserved locations within the BEAD budget.

Given this analysis and the State of Georgia's preference for fiber-to-the-premises, GTA intends to limit its first round BEAD grant process to fiber and to award BEAD funds to applicants based on a scoring matrix that prioritizes low cost as well as other public policy priorities, consistent with NTIA rules.

At the same time, GTA recognizes that the BEAD funds allocated by NTIA to Georgia may be insufficient to fund fiber to every single unserved and underserved location, particularly considering the unpredictability of fiber construction costs during the BEAD timeline and considering the challenges reaching many extremely remote locations. As a result, GTA anticipates taking a two-fold approach to address the potential that some locations are so costly for fiber deployment that they serve to reduce the potential to fund fiber in the remaining locations in that county. The following are the two sets of steps GTA anticipates undertaking:

1. GTA will allow applicants to designate locations within each County Grant Area that the applicant believes have a greatly disproportionate impact on the total cost of serving unserved and underserved locations within the County Grant Area. The applicants may note that they prefer not to serve those locations and propose a cost that does not include those locations. The applicants will be advised that aggressive elimination of locations, especially unserved locations, that effectively amounts to cherry-picking is greatly disfavored by GTA and that applications that are aggressive in this way may be disqualified or, in the event that GTA believes it warranted, the County Grant Area will be put out for applications in a subsequent application round. GTA seeks to enable applicants to identify specific locations that may make a County Grant Area too costly to be funded.

2. In addition, GTA may undertake a second-round grant process to seek alternative applications for some County Grant Areas, potentially for only unserved locations, for subdivided County Grant Areas, or for alternative technologies, as the circumstances dictate.

GTA intends that its grant program will result in new broadband coverage and service to 100 percent of unserved and most underserved locations. The grant program is designed to maximize the potential to deliver fiber-to-the-premises to the vast majority of those locations by focusing grant applications on fiber for both unserved and underserved locations and focusing a second round, if necessary, only on unserved locations or potentially on alternative technologies for any remaining locations for which fiber-to-the-premises is too expensive given the available funds.

5.1.4 Phases

The grant program will be comprised of the following two key phases:

1. **Scoring Phase**, to weigh the strength of applications received.

2. **Negotiation Phase**, to engage with applicants to reach final project boundaries and costs.

3. **Post Negotiation Scoring Phase**, to rescore applications as a result of negotiations due to the prospect of negotiations with multiple providers for the same project area if needed.

The following details the key phases GTA anticipates. Further, additional detail is also provided in the sections below, per NTIA's template for the Initial Proposal, Volume II.

5.1.4.1 Scoring Phase

Once GTA has received full authorization from NTIA based on approval of the outcome of the Challenge Process and of the Initial Proposal Volume II, GTA will open the grant window, distribute grant materials, and accept applications for proposed projects.

At that time, GTA will undertake the following:

- GTA will make BEAD application materials available on its website using a dedicated webpage. These materials will consist of an Application and Guide, Program Guide, and Frequently Asked Questions (FAQ) documents. GTA will provide an additional resources page on its website to direct potential applicants to third party resources that may be of use, including those provided by OPB, NTIA, NIST, FCC, and others.

- GTA will conduct an online application workshop within 2 business days of the grant window opening. This workshop will provide general instructions, discuss the program's goals and objectives, map out major program milestones, answer questions, and provide other technical assistance. This workshop will be recorded and available on the GTA website and the FAQ document will be updated frequently to reflect questions and answers from the workshop and questions received by email.

- During the time the grant application window is open, GTA will have a dedicated email address available for applicants to use to ask questions and request technical assistance and reasonable curing. To provide transparency, fairness, and additional technical assistance, GTA will update its FAQ document on a regular basis with the questions and answers generated by the email inquiries and in-person meetings.

5.1.4.2 Negotiation Phase

Once the applications are received, GTA will evaluate the full range of applications that are received and will consider how to follow up in a process that is designed to enable GTA to reach the best possible comprehensive and statewide outcome as a result of the grant process. NTIA's rules for the program explicitly allow for negotiation for a range of purposes, including to reduce or change pricing and to expand or reduce the boundaries of the areas proposed for funding. GTA intends to use the negotiation phase of the program for both purposes: first, to negotiate pricing with applicants to secure the best possible deal for the BEAD funds, and second, to negotiate coverage across County Grant Areas where necessary.

First, GTA will negotiate proposal area boundaries. If there exist defined County Grant Areas that do not receive any application at all, GTA will negotiate with one or more applicants to determine whether and under what circumstances they would be willing to serve those County Grant Areas. GTA may negotiate with one or more entities at a time to maximize the compressed timeline and secure the best possible deal for taxpayer funds, enabling the BEAD funds to serve as many unserved and underserved locations as possible.

In addition, GTA may negotiate with applicants regarding the locations identified by applicants as too costly to serve and excluded from their applications. As is described above in Section 5.1.3, GTA's grant application process will allow applicants to designate those locations they believe to be too costly to serve in the County Grant Area—with the understanding that aggressive elimination of locations may lead to disqualification of the application or a new grant round for the County Grant Area. GTA will negotiate with applicants as necessary regarding these excluded locations to achieve the dual goal of enabling applicants to identify locations that may serve to make County Grant Areas too costly to be funded, while at the same time protecting against aggressive cherry-picking.

Second, GTA will negotiate pricing, both with respect to County Grant Areas that received no applications in which GTA would like to elicit other applicants, and with respect to County Grant Areas that received applications but exceed the EHCPLT. GTA reserves flexibility to negotiate with one or more entities regarding potential pricing informed by comparisons with the EHCPLT and select based on final scores, seeking to maximize the reach and value of the BEAD funds to bring fiber to unserved and underserved locations throughout Georgia. Among the range of circumstances in which GTA may engage in negotiating pricing are the following:

- A County Grant Area does not receive any applications and GTA negotiates with other entities, potentially those that serve or propose to serve nearby locations, for pricing to serve it.
- A County Grant Area only receives proposals that exceed the EHCPLT, and GTA negotiates in the order of highest scoring applicant to bring the cost below the EHCPLT.
- More than one applicant provides a proposal for a given County Grant Area and GTA negotiates with all to secure the best and final offers that deliver the best pricing prior to establishing final scoring.
- All applications in a County Grant Area omit a substantial amount of the unserved or underserved BSLs in the County Grant Area.
- A grant applicant proposes to serve a number of different County Grant Areas and GTA negotiates lower pricing with the applicant based on the potential award of multiple County Grant Areas.
- GTA receives multiple applications for a County Grant Area and negotiates with applicants to reduce the number of eligible locations that are excluded.

To ensure transparency in the negotiation phase, GTA will follow the principles of openness, fairness, and competition described in Section 5.1.1 Principles (NTIA Guidance 2.4.1)—combined, these principles amount to transparency.

GTA anticipates negotiations will occur as it weighs and makes provisional awards for County Grant Areas. As stated in the bullets above, GTA will conduct negotiations with one or more qualified applicants for a County Grant Area, which can include applicants under consideration for the County Grant Area based on Round 1 scoring results and applicants under consideration for County Grant Areas near the County Grant Area based on Round 1 scoring results. GTA will use its Round 1 scoring results as a basis for prioritizing the order of negotiations but reserves the flexibility to conduct simultaneous negotiations with more than one applicant in the effort of getting the best pricing and most extensive coverage to unserved and underserved locations for BEAD funds. GTA will also provide feedback to those applicants that are not selected for negotiation.

In sum, GTA believes that flexibility to take the necessary steps during the negotiation phase is an essential element of securing the best, fairest, most competitive outcome for the BEAD process, particularly given the need for GTA's efforts to develop a broadband solution for 100 percent of eligible locations in Georgia.

Post Negotiation Scoring Phase

Following the Negotiation Phase, the GTA application review committee may rescore applications as a result of changes due to negotiations with multiple providers for the same project area. This process will be referred to as Post Negotiation Scoring.

5.1.4.2.1 Potential second round applications

Following review of applications, GTA may at that point choose, at its discretion, to run a subsequent grant round. If GTA chooses to run a second round, the notification regarding the intent to run a second round will be public, following the principles of openness, fairness, and competition described in Section 5.1.1 Principles, NTIA Guidance 2.4.1.

GTA may undertake a second round if, for any given County Grant Area, there are no applications received, if received applications exceed the EHCPLT, if the applications received significantly remove too many locations and are deemed ineligible by GTA, or if received applications deviate substantially from benchmark pricing. GTA may fine-tune this second round based on round one results. While it does not expect to change scoring rubrics, it may make adjustments to grant area boundaries or requirements. For example, GTA may choose that, for County Grant Areas for which it received financially unattractive applications in the first round, it will put those County

Grant Areas back out to apply for unserved areas only, to attract applications for fiber that are cost-effective relative to the BEAD funds available.

In addition to service providers who qualified for Round 1, service providers who did not participate in Round 1 will be invited to participate in Round 2. GTA will hold a workshop to help service providers qualify for Round 2 and the workshop will be available for replay via the internet.

GTA also plans to consider other alternative strategies that may allow for any or all of the following as a means of attracting applications that are more feasible given the available funds. These may include:

- Applications for County Grant Areas for alternative technologies, including licensed fixed wireless and coaxial cable, to unserved locations only, or to both unserved and underserved locations.
- Applications that utilize grant area boundaries other than county boundaries.
- Applications that exclude some eligible locations within a County Grant Area.

The second round of applications may be conducted during the negotiation process or after it is concluded, depending on GTA's assessment of the timeline and how to secure the best results. As with the first round, GTA may choose to undertake negotiations with applicants following the receipt and review of applications.

In the event that GTA is satisfied with the outcome of the first-round applications, it may elect not to proceed to a second-round process; however, GTA will have to conduct subsequent rounds until 100 percent of unserved locations have awards for service.

To ensure transparency in a potential second round:

- GTA will announce the second round, which will be open to existing qualified Round 1 applicants and new applicants that did not participate in Round 1. New applicants in Round 2 must successfully complete the qualification phase before being eligible to apply to provide service to any GTA-defined Round 2 service area. Qualified Round 1 participants do not need to re-qualify for Round 2.
- As in Round 1, GTA will conduct an online application workshop for potential participants. This workshop will provide general instructions, discuss the program's goals and objectives, map out major program milestones, answer questions, and provide other technical assistance. This workshop will be recorded and available on the GTA website

and the FAQ document will be updated frequently to reflect questions and answers from the workshop and questions received by email.

- During the time the grant application window is open, GTA will have a dedicated email address available for applicants to use to ask questions and request technical assistance and reasonable curing. To provide transparency, fairness, and additional technical assistance, GTA will update its FAQ document on a regular basis with the questions and answers generated by the email inquiries and in-person meetings.
- GTA plans to, throughout the process, use all available communication channels to update applicants on milestones, deadlines, updated FAQ material, and technical assistance resources as they are made available by GTA, OPB, NTIA, NIST, FCC, or other relevant partners.

5.1.4.2.2 Provisional awards

Once GTA and the applicants have concluded successful negotiations, following either one or two rounds of applications, OPB will issue provisional awards under the agreed upon terms. Subawardees will be required to execute provisional terms and conditions with OPB in order to be included in the State's Final Proposal that will be submitted to NTIA following a 30-day public comment period, as required by federal rules.

Upon NTIA approval of the Final Proposal, OPB will have subawardees execute updated terms and conditions reflecting the formal approval of the grants. Included in its formal contract with subgrantees, OPB will implement NTIA's recommended Sub-granting Accountability Procedures, which will include: 1) disbursement of funding on a reimbursable basis to ensure completion of subsidized activities; 2) claw-back provisions to allow for the recoupment of funds in the case of broken commitments; and 3) timely subgrantee reporting mandates and robust monitoring procedures aligned with OPB's reporting schedule to NTIA.

If an applicant is provisionally awarded one or more projects and the awarded party fails to execute on all commitments—such as when the party is not willing to accept full responsibility of the entire award—GTA reserves the right and opportunity to declare the award in default and solicit alternate proposals from incumbents or proposers of nearby project areas.

5.2 BEAD grant process overall timeline

The following is a tentative overall timeline for the BEAD grant process which depends on NTIA's approval of the results of the State Challenge Process. Note that dates will be updated based on the dates of approval by NTIA for Georgia's Initial Proposal Volume I and Volume II as prerequisites for initiation of the Challenge Process and grant program, respectively.

Table 1: Tentative timeline for the BEAD grant process

Process element	Initiation date	Concluding date
Challenge Process	January 2, 2024	No later than April 2, 2024
BEAD grant application materials, including County Grant Areas, released	April 3, 2024 (County Grant Areas will be released when the results of the Challenge Process are submitted to NTIA for approval)	
BEAD grant application workshop/webinar	April 19, 2024	
BEAD grant applications accepted by GTA	April 22, 2024	May 31, 2024
Review of BEAD grant application materials, including curing as necessary	June 3, 2024	June 28, 2024
Negotiation process	July 1, 2024	July 31, 2024
Second round grant window	August 5, 2024	September 13, 2024
Review of BEAD grant application materials, including curing as necessary	September 16,2024	October 11, 2024
Negotiation process (if necessary)	October 14, 2024	November 1, 2024
Announcement of provisional BEAD determinations, subject to NTIA approval of the Final Proposal	Round 1: August 1, 2024 Round 2: November 4, 2024	
30-day public comment period	November 11, 2024	December 10, 2024
Submission to NTIA of the Final Proposal	December 16, 2024	

5.3 Scoring methodology

5.3.1 Qualifications

Georgia's BEAD application materials will specify the materials and certifications that are required for qualification, together with the format and date for submission. The materials and certifications will be focused on materials that address financial, managerial, and technical qualifications as well as experience and capacity.

In the event reviewers find the data submitted to be insufficient or unclear, GTA may choose to cure submissions by providing applicants up to five business days to clarify or submit additional materials. All requests for clarification or additional submissions will be made in writing and all responses will be required to be in writing, with full documentation.

To determine qualifications, GTA will require the following materials and certifications for purposes of determining whether prospective subgrantees are qualified to receive awards in the event their applications score accordingly:

Financial capability

- Financial statements from the prior fiscal year that are audited by an independent certified public accountant.
- If the prospective subgrantee has not been audited during the ordinary course of business, in lieu of submitting audited financial statements, it must submit unaudited financial statements from the prior fiscal year and certify that it will provide financial statements from the prior fiscal year that are audited by an independent certified public accountant by a deadline specified by GTA.
- A statement signed by an executive with the authority to bind the company that certifies the financial qualifications.

Managerial capability

- Resumes of relevant management staff that cumulatively demonstrate a minimum of five years of experience with broadband network design, construction, maintenance, and operations.
- An organizational chart and a narrative detailing the applicant's processes and structure to manage large projects.

Technical capability

- If not submitted as part of the managerial capability requirements, applicants must provide the resumes of an employed Chief Technology Officer and contractor oversight team with the relevant certifications (both management and non-management) for deployment projects as mandated by state and federal law.
- Certification that if the applicant chooses to contract resources, all contracted resources will have the relevant and necessary skills.

Operational capability

- Certification that applicants have provided a voice, broadband, and/or electric transmission or distribution service for at least two consecutive years or that they are a wholly owned subsidiary of such an entity and attest to and specify the number of years the applicant or its parent company has been operating.
- If the applicant has provided a voice and/or broadband service, certification that the applicant has filed FCC Form 477s and Broadband DATA Act submissions, if applicable, as required during this time period, and otherwise has complied with FCC requirements.
- If the applicant has not provided broadband service and has operated only an electric transmission or distribution service, the applicant will be asked to submit qualified operating or financial reports, that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.

Legal compliance

- Certification that the organization is aware of the federal and state laws applicable to BEAD funded broadband deployment projects and that the organization possesses the qualifications and resources to perform BEAD-related commitments in compliance with all applicable federal and state laws.
- Applicants will also be required to describe their current compliance with all relevant federal and state laws and describe any violations of applicable laws and regulations, current or pending investigations, and current or pending legal actions.
- Certification that the applicant will permit workers on BEAD deployment projects to create worker-led health and safety committees that management will meet with upon reasonable request.
- Ownership information consistent with the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7).

Cybersecurity compliance

- Certification that the applicant has a cybersecurity risk management plan in place that is either: (a) operational, if the applicant is providing service prior to the award of the grant; or (b) ready to be operationalized upon providing service, if the applicant is not yet providing service prior to the grant award.

- Certification that the applicant's cybersecurity plan reflects the latest version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity (currently Version 1.1) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented.

- Certification that the applicant's cybersecurity plan will be reevaluated and updated on an annual basis which is inline within industry best practices.

- Certification that the applicant's cybersecurity plan will be submitted to GTA following execution of grant agreements, and if the applicant makes any substantive changes to the plan, a new version will be submitted to GTA within 30 days.

Supply chain compliance

- Certification that the applicant has a supply chain risk management plan in place that is either: (a) operational, if the applicant is already providing service at the time of the grant; or (b) ready to be operationalized, if the applicant is not yet providing service at the time of grant award.

- Certification that the applicant's supply chain risk management plan is based upon the key practices discussed in the NIST publication NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations and specifies the supply chain risk management controls being implemented.

- Certification that the applicant's supply chain risk management plan will be reevaluated and updated on an annual basis which is inline within industry best practices.

- Certification that the applicant's supply chain risk management plan will be submitted to GTA prior to the allocation of funds, and if the applicant makes any substantive changes to the plan, a new version will be submitted within 30 days.

Other public funding: A list of applications the applicant submitted or plans to submit related to federal or state broadband funding, and every broadband deployment project that the applicant or its affiliates are undertaking or have committed to undertake at the time of the application using public funds.

In addition, consistent with NTIA's requirements, GTA will require the following materials regarding Fair Labor Practices, which will be part of grant application scoring:

1. Certification from an Officer/Director-level employee, or an equivalent, of consistent past compliance with federal labor and employment laws on broadband deployment projects in the last three years, including:
    - Certification that the prospective subgrantee, as well as its contractors and subcontractors, have not been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years, or
    - Disclosure of any findings of such violations
2. Certification that the potential subgrantee has existing labor and employment practices in place and that the subgrantee will recertify this annually for the duration of the BEAD implementation period, including:
    - Applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the network.
    - Certification that the potential subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects and that the applicant will recertify this annually for the duration of the BEAD implementation period.
    - Certification that the subgrantee will ensure that all contractors and subcontractors also meet these requirements.
    - Project employment and local impact reports where Davis Bacon certification is not provided.

5.3.2 Scoring Phase

GTA's scoring rubric is consistent with NTIA's rules, which specify three primary criteria that together must account for 75 percent of scoring, as well as secondary criteria that are based on Georgia's own public policy priorities.

GTA will begin its evaluation of proposals by ensuring that the applicant has provided all required materials. Incomplete proposals will not be considered.

Following a determination of completeness, GTA will review and evaluate the proposals based on the following criteria, which can add up to a total score of 100.

5.3.2.1 Primary scoring criteria

Minimal BEAD program outlay: up to 50 points

Applications will receive up to 50 points for being the most cost-efficient proposal submitted for a particular County Grant Area. The most cost-efficient proposal, evaluated based on the total funding requested to provide broadband access to a County Grant Area divided by the number of locations proposed to be served in that County Grant Area (BEAD funding requested per location), will receive full points under this section. Less cost-efficient proposals will receive a percentage of points available relative to the most efficient application received for that County Grant Area.

For example:

If there are three applications for the same County Grant Area, and the average BEAD funding requested per location for each application is $2,500, $3,000, and $5,000, then the $2,500 application will receive the maximum credit under this section (50 points). The $3,000 per location application, because it is less cost efficient than the most efficient application, will receive 41.67 points (50*($2,500/$3,000)). The $5,000 per location application, because it is less efficient than the most efficient application, will receive 25 points. (50*($2,500/$5,000)).

Affordability: up to 15 points

Applicants will be awarded full points under the Affordability criterion for their commitment to provide broadband service in BEAD Program-funded project areas at rates in BEAD Program-funded service areas that are either:

(1) consistent with the broadband pricing the applicant makes available in unsubsidized areas within Georgia for the same or substantially the same level of service, for providers already serving Georgians; or

(2) no higher than the residential rates provided in the FCC's reasonable comparability benchmark calculated annually in the fixed broadband Urban Rate Survey ("URS") for the service tier with a specified download speed of 1 Gbps and upload speed of 1 Gbps, or the service tier most closely approximating download speeds of 1 Gbps and upload speeds of 1 Gbps if the URS does not include a Gigabit symmetrical service tier. Applicants that submit a proposal that exceeds this benchmark will receive a percentage of points reflective of their percent distance

from the value of the Urban Rate Survey per month, inclusive of all taxes, fees, and charges billed to the customer.

Applicants that do not demonstrate either of the affordability criteria will be awarded zero points.

Fair labor practices: up to 10 points

Up to 10 points will be awarded based on, as defined in Section IV.C.1.e of the NOFO, (1) a demonstrated history of compliance with federal labor laws—6 points will be awarded for full compliance during the most recent three years, and, as noted below, up to 5 points will be deducted for official violations in the three years preceding the date of application (6 points); and (2) demonstrated commitments (including relevant plans included in the grant application) to future compliance with federal labor laws—1 point will be awarded for a commitment to local hiring (see Section 8.1, item 3) (4 points).

New entrants without a lengthy record of labor and employment law compliance will receive up to 10 points in this category based on specific, concrete commitments to strong labor and employment standards and protections going forward. New entrants should refer to Section 8 below for a list of commitments that subgrantees will be expected to make—1 point will be awarded for a commitment to local hiring (see Section 8.1, item 3).

Consistent with Section IV.C.1.e of the NOFO, up to 5 points will be deducted for official violations in the three years preceding the date of application.

5.3.2.2 Secondary criteria

Speed to deployment: up to 5 points

All subgrantees that receive BEAD Program funds for network deployment must deploy the planned broadband network and begin providing services to each customer that desires broadband services within the project area no later than four years after the date on which the subgrantee receives the subgrant from the State.

GTA will provide full credit under this section if a prospective subgrantee demonstrates broadband access will be available to all locations in the project area within 3 years of the award announcement. As justification, prospective subgrantees must submit additional information and justification of this 3-year timeline, including efforts to mitigate delays, shortages, and constraints in supply chains, workforce development, federal requirements imposed by the BEAD program, and permitting associated with broadband network construction.

Community/local government support: up to 9 points

GTA will award up to nine points to applicants for demonstrations of support from local governments and other community institutions and stakeholders. Points will be awarded based on both the volume of documents of support and on the clarity and extent of support demonstrated in the documentation. Documents can include such items as letters, board or council resolutions, commitments of funding, and commitments to purchase services if the project is funded. Additionally, applicants are encouraged to outline either their past efforts or future plans, if any, for enhancing digital connectivity within their service areas. This could include support for access to devices, digital skills training, enrollment, and awareness for the Affordable Connectivity Program (ACP), workforce development, or any other community-based initiatives or partnerships aimed at addressing digital connectivity challenges. Communities and local governments may support more than one application in their County Grant Area if they choose. GTA will award up to two points for support from the county, and up to one point for support from each local government, elected official, or other community institution in the proposed County Grant Area, up to a maximum of nine points.

Connecting CAIs at a gigabit symmetrical: up to 3 points (for Priority Broadband Projects only)

GTA recognizes that the BEAD allocation for Georgia will likely be insufficient to reach the third statutory priority for deployment, CAIs. However, the State of Georgia places a high value on best-in-class, future-proof connectivity to CAIs statewide. In particular, the State recognizes the necessity of end-to-end fiber connectivity to community anchors such as government buildings, libraries, schools, higher education, and institutions that provide internet services to the public.

For these reasons, GTA will award up to 3 points to applicants that demonstrate that, at no additional cost to the BEAD program, they will deploy fiber infrastructure to connect CAIs to 1 Gbps/1 Gbps service and latency of less than or equal to 100 milliseconds (ms) that currently lack such service[5] as determined through the Challenge Process in early 2024.

All 3 points will be awarded to an applicant that demonstrates that it will provide fiber connectivity to all currently unserved CAIs, identified through the Challenge Process, in the County Grant Area it proposes to serve.

Percentage of CAIs connected	Points
Fiber connectivity to all CAIs in County Grant Area that do not have 1 Gbps symmetrical capable connection and latency less than or equal to 100 ms	3
Fiber connectivity to 66.7-99.9% CAIs in County Grant Area that do not have 1 Gbps symmetrical capable connection and latency less than or equal to 100 ms	2
Fiber connectivity to 33.4-66.6% CAIs in County Grant Area that do not have 1	1

[5] NOFO, p.37 (IV.B.7.a.ii).

Gbps symmetrical capable connection and latency less than or equal to 100 ms	
Fiber connectivity to 0-33.3% CAIs in County Grant Area that do not have 1 Gbps symmetrical capable connection and latency less than or equal to 100 ms	0

Connecting CAIs at a gigabit symmetrical: up to 3 points (*for Other Last-Mile Broadband Deployment Projects only*)

GTA recognizes that the BEAD allocation for Georgia will likely be insufficient to reach the third statutory priority for deployment, CAIs. However, the State of Georgia places a high value on best-in-class, future-proof connectivity to CAIs statewide. In particular, the state recognizes the necessity of end-to-end connectivity to community anchors such as government buildings, libraries, schools, higher education, and institutions that provide internet services to the public.

For these reasons, GTA will award up to 3 points to applicants that demonstrate that, at no additional cost to the BEAD program, they will deploy infrastructure to connect CAIs to 1 Gbps/1 Gbps service and latency of less than or equal to 100 milliseconds (ms) that currently lack such service[6] as determined through the Challenge Process in early 2024.

All 3 points will be awarded to an applicant that demonstrates that it will provide connectivity to all currently unserved CAIs, identified through the Challenge Process, in the County Grant Area it proposes to serve.

Percentage of CAIs connected	Points
Connectivity to all CAIs in County Grant Area that do not have 1 Gbps symmetrical capable connection and latency less than or equal to 100 ms	3
Connectivity to 66.7-99.9% CAIs in County Grant Area that do not have 1 Gbps symmetrical capable connection and latency less than or equal to 100 ms	2
Connectivity to 33.4-66.6% CAIs in County Grant Area that do not have 1 Gbps symmetrical capable connection and latency less than or equal to 100 ms	1
Connectivity to 0-33.3% CAIs in County Grant Area that do not have 1 Gbps symmetrical capable connection and latency less than or equal to 100 ms	0

Universality of Applications: up to 8 points *(for Priority Broadband Projects only)*

As previously mentioned, scoring preference will be given to applicants who propose to serve the greatest number of eligible unserved and underserved locations within a County Grant Area. Points will be assigned as follows:

[6] NOFO, p.37 (IV.B.7.a.ii).

Percentage of Locations Proposed to Serve	Points Available
0-89.99%	0
90-94.99%	2
95-97.99%	4
98-99.5%	6
99.51-100.00%	8

Speed of Network and Other Technical Capabilities: up to 8 points (*for Other Last-Mile Broadband Deployment Projects only*)

Pursuant to NTIA rules, applications will be scored based on applicants' demonstration of the speeds, latency, and other technical capabilities of the technologies proposed for projects that are not Priority Broadband Projects (i.e., that use technologies other than fiber-to-the-premises).

NTIA requires assigning greater weight to those applications that propose to use technologies that exhibit greater ease of scalability with lower future investment and whose capital assets have longer useable lives over those proposing technologies with higher costs to upgrade and shorter capital asset cycles.

Accordingly, GTA will award up to five points to Other Last-Mile Broadband Deployment Projects that can demonstrate the following:

- **Speed of Network and Sufficient Capacity**: 3 points will be awarded to applications that demonstrate that the proposed project can reliably deliver 100/20 Mbps broadband service to at least 80 percent of unserved locations in the proposed service area. Applications must detail the selection of technology and particular hardware configurations in both backbone and last-mile segments, including any assumptions and/or calculations around capacity oversubscription, limitations imposed by terrain, and geographic constraints, to definitively demonstrate the connection speed and network capacity requirements can be met. Applicants that do not make this demonstration will be awarded zero points for Speed of Network and Sufficient Capacity.

- **Scalability**: 3 points will be awarded to applications that demonstrate that the proposed infrastructure will be capable of delivering higher speeds in the future, including that the infrastructure will be scalable with respect to capacity to support higher speeds to 80 percent of currently unserved locations in the proposed service area. Applications must detail the specific approach to scalability both in backbone and last-mile segments of the network, such as increased wireless base station sectorization, hardware upgrades,

addition of towers, etc., to include projected capital costs per location associated with upgrades necessary to deliver increased service level thresholds of the applicant's choosing (i.e., 100/100 Mbps, 500/100 Mbps, 1000/1000 Mbps). Applications that do not make this demonstration will be awarded zero points for Scalability.

- **Cost-effective future upgrade and capital investment path**: Up to 2 points will be awarded to applications that demonstrate a cost-effective projected technical upgrade path, including a capital investment timeline and costs for equipment refresh and replacement cycles.

5.3.3 Scoring rubric

When this Initial Proposal is submitted to NTIA, it will include a complete and expanded scoring rubric which will be attached in Appendix I. An outline of GTA's proposed scoring rubric is summarized below, first for Priority Broadband Projects and then for Other Last-Mile Broadband Deployment Projects:

Table 2: Scoring criteria for Priority Broadband Projects

Scoring Criteria	Points available
Primary Criteria (all are mandatory under NTIA rules)	
Total outlay of funds	50
Affordability	15
Compliance with federal fair labor laws	10
Primary Criteria subtotal	**75**
Secondary Criteria	
Speed to deployment (mandatory under NTIA rules)	5
Community/local government support	9
Community Anchor Institutions	3
Universality of Applications	8
Secondary Criteria subtotal	**25**
Total	**100**

Table 3: Scoring criteria for other last-mile broadband deployment projects

Scoring Criteria	Points available
Primary Criteria (all are mandatory under NTIA rules)	
Total outlay of funds	50
Affordability	15
Compliance with federal fair labor laws	10

Scoring Criteria	Points available
Primary Criteria subtotal	**75**
Secondary Criteria	
Speed to deployment (mandatory under NTIA rules)	5
Community/local government support	9
Community Anchor Institutions	3
Speed of network and other technical capabilities (mandatory under NTIA rules)	8
Secondary Criteria subtotal	**25**
Total	**100**

5.4 Prioritization of unserved BSLs, underserved BSLs, and eligible CAIs

GTA recognizes the prioritization in the Bipartisan Infrastructure Law for unserved locations as first priority, underserved locations as second priority, community anchor institutions as third priority, and affordable housing and other priorities following the first three. This prioritization is mandated by the statute and aligns with the State of Georgia's plans for how to utilize the BEAD funds.

Georgia's internal modeling suggests that the funds available will provide service to all unserved and most underserved locations in Georgia. However, GTA believes it is unlikely that Georgia will have sufficient BEAD funds for community anchor institutions, or the other items established by the statute as lower priority than getting broadband infrastructure to unserved and underserved locations.

Given this analysis and the data that have been analyzed by GTA, GTA proposes to focus the BEAD funding on unserved and underserved locations.

At the same time, GTA recognizes that, given current inflationary pressures and projected demand for broadband construction labor and materials during the BEAD deployment process, the first round of applications may result in total costs for all unserved and underserved locations that exceed the available BEAD funds. In that case, GTA reserves the opportunity to limit second round applications to unserved locations only as a means of ensuring that 100 percent of unserved locations receive service through BEAD.

If all unserved and underserved locations can be served based on the results of the BEAD application process described above, GTA may then undertake an additional application round with remaining BEAD funds for service to community anchor institutions that were not included in other applications.

5.5 Prioritization of non-deployment projects

GTA does not anticipate having non-deployment subgrantees. The State of Georgia's estimate to provide universal service exceeds its BEAD allocation, so GTA does not anticipate having additional funds for other items.

If, however, the State has additional funds after provisionally issuing the broadband grants, it will plan to fund non-deployment activities with its remaining funding. Consistent with the BEAD Notice of Funding Opportunity, GTA will consider supporting additional deployment and nondeployment activities related to the following, as outlined in the Five-Year Action Plan:

1. Identify and connect unserved units in multiple-dwelling-unit buildings with a minimum of 100/20 Mbps service, while assessing and upgrading the internal wiring to facilitate high-speed internet access for all units simultaneously.

2. Support programs that alleviate barriers to digital connectivity, enabling economic empowerment, promoting academic success, and enhancing community health.

5.6 Environmental and historic preservation and Build America, Buy America Act compliance

GTA recognizes the public policy purposes of environmental and historic preservation as well as the Build America, Buy America Act (BABA), restrictions on purchases of fiber equipment, and the Secure and Trusted Communications Network Act of 2019.[7] GTA plans to highlight the criticality of these requirements for potential applicants during the application workshops and in the various application materials—and will require that all applicants certify their intention to comply with all related requirements.

GTA will also require applicants to certify that they have no history of failure to comply with environmental and historic preservation requirements or BABA, to the extent applicable.

Any applicant that cannot certify a track record of full compliance will be required to provide detailed narrative and documentation regarding its histories of challenges or noncompliance. In addition, GTA intends that it will actively use its subgrantee monitoring program post-award to verify that applicants are indeed compliant with these requirements.

[7] Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. § 1608). The Act directs the FCC to develop and maintain a public list of "covered communications equipment or services." The list is updated from time to time using the FCC's methodology set forth in 47 CFR §1.50002 and can be found at https://www.fcc.gov/supplychain/coveredlist.

5.7 Project area definition

As it did in 2022 with its successful Capital Project Fund (CPF) grant program, Georgia anticipates offering applicants the opportunity to apply for project areas at the county level, such that all applications will be required to propose to build to unserved and underserved addresses countywide (each county and its eligible locations will hereinafter be referred to as "County Grant Area").

This approach is designed to enable efficient application review with minimal application overlap or need for deconfliction. Additionally, this approach is designed to enable participation by applicants of all sizes, given that Georgia's many counties are small relative to most states and their size should not pose a barrier to participation by smaller entities. Establishing application areas at the county level is further supported by the state's successful experience with this approach for CPF and the enthusiastic participation in that program by eligible applicants of all sizes.

Additionally, to allow for more flexibility regarding County Grant Areas, GTA will allow applicants the option to partner with other applicants to apply for a County Grant Area. If applicants choose to form a partnership, details of the partnership must be clearly outlined in the prospective subgrantees' applications at the time of submission. Each applicant partnering will submit an individual application detailing their prospective specific project area(s) and proposed BSLs within the county and reference the other project(s) and applicant(s) working to serve locations in such a way that a comprehensive plan is formulated to solve broadband for the county in which they applied.

5.8 Approach to subsequent funding rounds if no viable proposals are received

As described above, in the event no proposal (or no viable proposal) is received for any given County Grant Area, GTA plans to undertake one or both of the following processes, depending on the circumstances.

1. First, GTA anticipates undertaking negotiations with one or more applicants that have applied for adjacent areas to determine whether other applicants would be willing to take on commitments to fund those locations, based on costs that will be negotiated between the applicant and GTA. GTA may choose to negotiate with one or more applicants to maximize the chances of determining a solution for those locations.

2. Second, GTA anticipates that, depending on circumstances, it may choose to undertake a second competitive process to formally attract applications for those locations.

GTA reserves for itself the flexibility to undertake one or both of these processes following receipt of the applications. GTA believes that the flexibility to undertake these processes based on circumstances will increase the competitive pressure on applicants and for that reason declines to limit its options in this regard.

GTA contemplates the following in Round 1:

1. GTA will receive applications and score them for each County Grant Area.
2. If GTA receives one or more project applications for a County Grant Area that meets BEAD program requirements, then GTA will proceed with negotiations based on scoring outcomes. As described below, GTA may wish to negotiate awards during the negotiation phase of Round 1.
3. GTA will use the data received in Round 1 and its own benchmark data to calculate the Extremely High Cost Per Location Threshold (EHCPLT).
4. Following potential negotiations, the State will provisionally award the applications that score the highest following the Post Negotiation Scoring Phase as long as the applications meet BEAD program requirements.

Negotiation phase following Round 1:

1. GTA will conduct negotiations as described above in Section 5.1.4.2, Negotiation Phase. GTA believes that flexibility to take the necessary steps during the negotiation phase is an essential element of securing the best, fairest, most competitive outcome for the BEAD process, particularly given the need for GTA's efforts to develop a broadband solution for 100 percent of eligible locations in Georgia.
    a. GTA's policy goals are those of the BEAD program: to serve all unserved BSLs, to serve as many underserved BSLs as possible, and to deliver future-proof technologies to as many BSLs as possible.
    b. GTA will hold a webinar to enable service providers to qualify for Round 2. The webinar will be available via the internet afterwards for those who cannot attend it when it is live.

If there are a sufficient number of areas left unserved after Round 1, such that it would make sense to have a Round 2, GTA will hold a Round 2.

1. Round 2 will be open to all providers who were eligible to apply in Round 1.
    a. GTA will determine the project areas for Round 2

   b. GTA will provide notice and a specified application period

   c. Evaluation will be the same as Round 1

2. Following Round 2, GTA contemplates a brief negotiation phase that will be necessarily short to accommodate other BEAD program deadlines.

Based on current budgetary considerations, GTA does not currently anticipate offering financial inducements outside the allocated BEAD funds.

5.9 Projects on Tribal lands

Not applicable.

5.10 Identifying the Extremely High Cost Per Location Threshold (EHCPLT)

Following receipt of applications in the first round, GTA will determine the Extremely High Cost Per Location Threshold (EHCPLT) based on the data regarding per location costs in the grant applications and will use it to efficiently allocate its BEAD funding based on the applications received. GTA will develop the EHCPLT using the pricing and associated data provided by applicants through the application process, including feedback and outcomes from the Negotiation Phase of the process.

Based on both state and federal goals (and the federal requirement) to fund fiber-to-the-premises wherever possible, GTA will prioritize an EHCPLT as high as possible to ensure greater fiber coverage.

In addition to the data provided by applicants, GTA may also consult other data, such as:

- The Eligible Entity Planning Tool provided by NTIA.
- Data developed by GTA during previous broadband grant programs.
- GTA's own cost model data, developed over the course of 2023 by GTA's contract engineers and analysts based on customized Georgia cost considerations and a full business case analysis that considers capital costs, operating costs, and revenues over the appropriate time frame.

Based on all these inputs, GTA will develop the EHCPLT in order to determine at what cost per unit (if any), fiber-to-the-premises is too costly to achieve the critical BEAD goal of achieving 100 percent broadband coverage with the funds provided in the BEAD allocation.

5.11 Utilizing the EHCPLT

Given GTA's goal of achieving 100 percent broadband statewide, while maximizing fiber-to-the-premises, GTA proposes the following approach to determining whether to fund fiber applications that exceed the EHCPLT (calculated by the average funding request per location) and where a lower cost non-Priority Broadband Project has been proposed and meets the minimum standards:

After reviewing all first-round applications and available funding, GTA will preliminarily award any County Grant Area for which a single eligible proposal is received if it comes under the EHCPLT.

In areas where more than one proposal is received, and the bids are under the EHCPLT, the highest scoring proposal following the Post Negotiation Scoring Phase will be selected.

In all other areas where proposals are received, but no proposal comes under the EHCPLT, GTA will negotiate with the highest scoring applicant and provide that applicant the opportunity to revise its proposal so that it does not exceed the EHCPLT. If the highest scoring applicant is unable to reduce their cost below the EHCPLT, GTA will offer other applicants the same opportunity in order of highest score.

If no applicant for the County Grant Area is able to reduce its cost per location sufficiently, GTA will move the County Grant Area to a second round of applications.

If no Priority Broadband applicant is able to offer a cost per location that is below the EHCPLT, GTA will then undertake the same process for applications that propose an alternative, non-fiber technology that meets the BEAD program's requirements for Reliable Broadband Service and where the proposed cost is below the EHCPLT. GTA will undertake the same process as is described above with such applications, in order of highest scoring applications.

If necessary, GTA will then undertake the same process for applications for non-fiber technologies that do not meet the BEAD program's requirements for Reliable Broadband Service (while otherwise satisfying the Program's technical requirements) because no technology meeting the Reliable Broadband Service requirements can be deployed for less than the Extremely High Cost Per Location Threshold at the given locations.

Throughout the EHCPLT process, GTA may allow applicants to request a waiver for the 25 percent matching funds requirement to ultimately secure commitments to serve all required locations.

5.12 Requiring prospective subgrantees to certify their qualifications

GTA will require potential subgrantees to demonstrate financial, technical, and managerial capabilities through a series of application questions and document requests. Potential subgrantee responses and documentation will be collected through an online portal and analyzed to support an informed assessment of the potential subgrantee's capability to meet the obligations of the project, maintain available funds to support the project, and demonstrate financial and technical viability of the project.

GTA's application will require potential subgrantees to provide narrative responses, certifications, and documentation to demonstrate financial expertise and available resources to meet program requirements and successfully complete a funded project.

5.12.1 Officer certifications

GTA will require a certification from an officer or director of a prospective subgrantee that the organization has the necessary financial qualifications, capabilities, and resources to comply with all program requirements and successfully participate in the program.

Applicants will be required to submit project-specific certifications by an officer or director of the company. The organization will certify that it will have sufficient financial resources to successfully complete its proposed project and will further certify that it understands the program will use a reimbursement model, requiring subgrantees to commit resources to construct the network and begin service prior to receiving grant award funding as reimbursement for eligible expenses.

Additionally, during the Scoring Phase, GTA will require certifications from the applicant that it will have sufficient financial resources to provide the pledged matching funding as required by the program rules. GTA will require applicants to demonstrate, in their budgets, budget narratives, and pro forma statements that they will comply with the requirements for match that are mandated by the language of the statue and NTIA's rules (Section III.B). Those requirements are for a minimum 25 percent match for all locations other than those classified by NTIA as "high cost," for which there is no required match.

These certifications, along with the financial documentation discussed below, will provide GTA with necessary assurances of the applicant's financial qualifications and capabilities.

5.12.2 Letter of credit or performance bond

The BEAD NOFO outlines program rules which require subgrantees to obtain an irrevocable standby letter of credit from a qualified financial institution. On November 1, 2023, NTIA issued a programmatic waiver which modifies the letter of credit requirement for subgrantees to:

- Allow Credit Unions to Issue LOCs. The NOFO requires subgrantees to obtain a LOC from a U.S. bank with a safety rating issued by Weiss of B− or better. The waiver permits subgrantees to fulfill the LOC Requirement (or any alternative permitted under the waiver) utilizing any United States credit union that is insured by the National Credit Union Administration and that has a credit union safety rating issued by Weiss of B− or better.

- Allow use of Performance Bonds. The waiver permits a subgrantee to provide a performance bond equal to 100 percent of the BEAD subaward amount in lieu of a letter of credit, provided that the bond issued by a company holding a certificate of authority as an acceptable surety on federal bonds as identified in the Department of Treasury Circular 570.

- Allow Eligible Entities to Reduce the Obligation Upon Completion of Milestones. The waiver allows an Eligible Entity to reduce the amount of the letter of credit obligation below 25 percent over time or reduce the amount of the performance bond below 100 percent over time, upon a subgrantee meeting deployment milestones specified by the Eligible Entity.

- Allow for an Alternative Initial LOC or Performance Bond Percentage. The NOFO requires that the initial amount of the letter of credit be 25 percent of the subaward (or the initial amount of the performance bond be 100 percent of the subaward under the option described above). The waiver allows the initial amount of the letter of credit or performance bond to be 10 percent of the subaward amount during the entire period of performance when an Eligible Entity issues funding on a reimbursable basis consistent with Section IV.C.1.b of the NOFO and reimbursement is for periods of no more than six months each.

GTA's letter of credit process will require program participants to satisfy three steps.

GTA will require applicants to certify that they are aware of and understand the updated letter of credit or performance bond obligation based on NTIA's programmatic waiver. Applicants must further certify that they have the qualifications and resources to obtain the required letter of commitment and letter of credit from an eligible financial institution or, if they choose to obtain a performance bond, submit a letter from a company holding a certificate of authority as an acceptable surety on federal bonds as identified in the Department of Treasury Circular 570 which contains the dollar amount of the performance bond.

Applicants choosing to obtain a letter of credit will be required to present a letter of commitment from a qualified financial institution. GTA will define a "qualified financial institution" as one that meets the program rules for the FCC's RDOF program (47 C.F.R. §54.804(c)(2)) and any United States credit union that is insured by the National Credit Union administration and has a credit union safety rating issued by Weiss of B- or better.

This letter of commitment must describe the type of financial institution that is making the commitment using the categories in 47 C.F.R. §54.804(c)(2). The letter of commitment must also state that the financial institution stands ready to issue an irrevocable standby letter of credit for the proposed project in the required amount and must specify the expected amount. The financial institution must also state that it has reviewed the model letter of credit and is prepared to comply with all terms and conditions for the letter of credit under this program.

Upon completion of the Scoring Phase, successful subgrantees with awarded projects will be required to obtain an irrevocable standby letter of credit or performance bond.

Submission of this letter of credit or performance bond will be a condition of a final award agreement. A copy of the letter of credit or performance bond for each funded project must be submitted directly from the issuing financial institution or surety company within 60 days of the notification of the award and prior to the finalization of the final award agreement. Failure to submit the letter of credit or performance bond directly from the issuing financial institution or surety company within 60 days of the notification of the award may result in the termination of the subgrantees award. GTA will ensure that funding will only be committed or distributed upon submission of a proper letter of credit or performance bond.

As an additional condition of the final award agreement, subgrantees will be required to submit a bankruptcy opinion letter from legal counsel within 30 days that states the letter of credit is drafted in such a way that under a Title 11 bankruptcy proceeding the bankruptcy court will not treat the letter of credit or proceeds from the letter of credit as "property" of the subgrantee's bankruptcy estate under Section 541 of the United States Bankruptcy Code. If a subgrantee chooses to exercise the option to obtain a performance bond based on NTIA's waiver, this requirement is waived.

GTA has requested a limited waiver for the BEAD Letter of Credit from NTIA in certain circumstances, including the following situations: Large Existing Georgia Company 1) Subrecipient parent company has $100 million telecommunications assets or electric plant in production in the State of Georgia; and 2) Subrecipient agrees to get paid at the end of the project. Smaller Project, Proven Company 1) Subrecipient agrees to get paid at the end of the project; and, 2) Proposed project is less than $5 million total BEAD funds with no Davis-Bacon

requirements; and, 3) The State of Georgia has a proven track record with the subrecipient through American Rescue Plan Act Grants where the subrecipient has not defaulted on their grant agreement and has either completed or is on track to complete their project on time/budget.

5.12.3 Financial statements

In addition to the certifications discussed above, GTA will require potential subgrantees to submit documentation of their financial capabilities. Applicants will be required to submit one year of audited financial statements. These financials must be audited by an independent certified public accountant and conform to industry standards.

These financial statements should be "unqualified" and the subject of a clean financial audit. If the submitted statements contain "qualifications" by the auditor, the potential applicant must describe and explain the qualification, the reason for the qualification, and measures taken by the company to address the qualification if applicable.

If an applicant does not prepare audited financial statements in the ordinary course of business, it must describe the circumstances and reasons for the lack of audited financials and provide a year of financial statements that contain substantially the same level of detail and information. An applicant without audited financial statements must also certify that it will provide a year of audited financials within 90 days with the ability to request an extension with evidence that the applicant has engaged an accounting firm and are making reasonable progress.

Other entities that may have alternative financial reporting requirements, such as public entities, will be allowed to submit relevant and applicable financial documentation that provide substantially similar information and that will allow GTA to substantiate the public entity's financial qualifications and capabilities to participate in the program. A certification by an officer of the entity and a narrative explanation by the public entity must accompany the submitted financial documentation.

During the Scoring Phase, GTA will review these financial statements together with the applicant's submission of project-specific financial documentation discussed below, such as budgets, capital expenditures, and pro forma business case analyses as part of the applicant's overall showing of financial qualifications and capability.

5.12.4 Financial sustainability

During the Scoring Phase, GTA will request specific and detailed documentation and narrative descriptions of the applicant's business plans, budgets, and timelines for the proposed project.

To assess the financial sustainability of a proposed project, GTA will require applicants to complete and submit a budget narrative, proposed budget, and pro forma business case analysis. Applicants will be required to use the templates provided for these submissions.

Applicants will be allowed to upload additional documentation that they believe will complement the template information and will present a fuller picture of the applicant's financial capabilities and the proposed project's financial sustainability.

The budget narrative template requires applicants to provide a detailed breakdown of the expected budget for 11 standardized categories. Additionally, the narrative will require a description of each charge, the entity or team responsible for that budget expense (if applicable and if known), and how each category expenditure relates to the project objectives. If the applicant will be providing a cash or in-kind match in this cost category, this must be noted and explained in the justification to include a break-down of the grant and match share of each proposed cost.

GTA will require applicants to demonstrate that costs proposed for this grant program will be reasonable, allowable, allocable, and necessary to the supported activity. The Scoring Phase Application and Guide, as well as the Program Guide, will reference 2 CFR Part 200 for applicable administrative requirements and cost principles. These program materials will also discuss program objectives and describe the specific allowable and unallowable costs and activities. GTA will provide additional technical assistance and Frequently Asked Questions materials to support this element of an applicant's showing.

Applicants will also submit templates to present a pro forma business case analysis to present their financial projections to demonstrate sustainability. These templates ask for assumptions regarding take rates, churn, revenue-per-user, operating expenses, cash flow, and capital expenditures over the course of the construction and start-up operations for a 10-year period. The template also requests a proposed project budget with standard categories that correspond with the cost categories in the template budget narrative.

By standardizing this application requirement using templates, GTA can review the financial sustainability of each project in a more consistent, fair, and transparent manner.

GTA will further review these materials, in combination with the audited financial statements submitted, to validate the showing of financial sustainability. GTA will additionally consider the expected growth of the project and ongoing benefits to the community beyond completion of the build and disbursement of grant funding.

However, recognizing that applicants may have different internal record keeping and business planning processes, in addition to the required template information, GTA will also accept additional documentation that gives applicants additional opportunity to present supplementary demonstration of financial sustainability tailored to the proposed project.

GTA will ensure that requests for the pro forma and business plan information in this section of the application will be complementary to, not duplicative of, documentation provided by the applicant in response to other sections of the application or the applicant's qualification submissions. To avoid inefficient and duplicative submissions, applicants will be allowed to reference submissions from other parts of its application to satisfy these requirements.

5.12.5 Managerial capability

GTA will require potential subgrantees to demonstrate managerial capability to successfully complete and support a BEAD funded broadband network. The potential subgrantee's showing of its managerial capability is expected to be comprehensive and robust and demonstrate a commitment to long-term success of the project well beyond the period of construction. GTA expects to put a detailed reporting framework in place that will require successful subgrantees to demonstrate ongoing commitment of resources, stable leadership, and continued improvement of processes and services to the funded area.

5.12.5.1 Key management personnel resumes

Applicants will be required to provide current resumes of all key management personnel, as well as a narrative discussion of each individual's expected role in a BEAD-funded project. Each of the identified individuals shall be an employee of the organization, have at least five years of experience in the same or similar role within the communications industry, and have the demonstrated experience, skills, and authority to successfully fulfill the obligations of the role.

GTA will expect applicants to identify and submit resumes for management personnel in roles such as officers and directors of the organization, executive level management, financial planning and strategy, technical design, risk management, human resources, equipment procurement, operations, and planning.

5.12.5.2 Organizational charts

In addition to resumes for key individuals within the organization, applicants will be required to submit detailed organizational charts of the organization's structure, key management personnel, and relevant operational teams. These charts will also provide information regarding the organization's parent company and affiliates, if any. The organizational chart is expected to correspond to the other elements of the entity's showing of managerial capability, including mapping back to each identified key management personnel and functional teams. Applicants

should describe any recent or expected changes to the organization's structure, processes, and planning that may impact its BEAD project efforts.

5.12.5.3 Organizational experience and qualifications

Applicants will be required to provide a narrative description of the organization's background and experience managing broadband infrastructure projects of similar size and scope and under similar circumstances, such as the timeframes, reimbursement models, and geographic characteristics.

The applicant's narrative will also be required to describe the organization's experience, resources, and readiness to provide the required service offerings, level of service, and maintenance over the completed network. The organization will be required to describe plans to maintain a sufficient level of management resources through training, retention, and recruitment activities to support its service delivery efforts throughout the federal interest period.

The entity will be expected to also describe and provide documentation regarding any independent contractors, consultants, and subcontractors that it plans to retain to supplement its managerial capabilities. This description should include the scope of the third-party contractor's role and the expected term of the engagement.

An applicant that is a new entrant will be required to demonstrate how it will develop its organization's managerial expertise and resources through the recruitment of directly employed key management personnel with the requisite leadership experience of at least five years in prior roles and positions in the communication industry.

All applicants and partnerships must certify that there is no collusion, bias or conflict of interest or provide ownership and partnership disclosures as outlined in 47 CFR 1.2105(a). All applicants and partnerships must likewise disclose foreign interest if pertinent.

All applicants must certify that they will not engage in prohibited communications as defined in 47 CFR 1.2105(a) starting from the date of submission of preregistration application until final award.

5.12.5.4 Project-specific managerial requirements

Applicants will be required to provide additional data and descriptions of their management capabilities to specifically address any unique needs of the proposed project that is the subject of the Scoring Phase application. This project-specific management showing should reflect and correspond to other elements of the Scoring Phase application including financial capability, network design, budgeting, and planning.

For example, if a proposed project will primarily serve a rural area, applicants should include specific references to key management personnel, organizational teams, and the entity's general experience with projects in similarly rural areas. Similarly, if an applicant proposes a project that will serve significant numbers of multi-unit buildings or utilize a unique construction technique, applicants should highlight the experience of the entity or its management personnel in those areas. GTA will require information that demonstrates that the applicant has sufficient managerial capabilities to support a successful BEAD funded project, with specific reference to the uniqueness of the project.

5.12.6 Technical capabilities

Applicants will be expected to demonstrate their technical capability to participate in the program and successfully complete a funded project. This showing will complement the applicant's management capabilities and will provide GTA additional detail to substantiate overall technical expertise, knowledge, and capabilities as well as information about the applicant's federal and state technical certifications, licenses, and standards.

5.12.6.1 Officer and director certifications

Applicants will be required to provide certifications from an officer or director of the company that they are fully and properly licensed in Georgia to conduct funded activities and comply with all post award obligations.

Applicants will further certify that they have the processes and resources in place to employ an appropriately skilled and credentialed workforce and that key technical personnel and technical team members are current on all required training, licensing, and license renewals. Applicants must also certify that they are technically qualified to complete and operate a broadband network and that they are capable of carrying out BEAD funded activities in a competent manner.

GTA will provide a list of required licenses and certifications as part of its Application Guide and Program Guide posted on its website and discussed during the workshop.

5.12.6.2 Certifications and licenses

In addition to the certifications from an officer or director, applicants will be required to provide a list of the business and technical certifications and licenses that will be relevant to their participation in the BEAD program that it holds nationally and in Georgia. This list will include certifications and licenses held by key technical personnel as well as those held by the organization. The list will be required to include unique identifiers and license numbers to allow GTA to validate the reported data.

Applicants will also submit descriptions of workforce training and certification programs that they rely on, or expect to rely on, to support a continued commitment to a highly skilled and trained

workforce. These programs should include certified apprenticeship programs, community college curricula, and for-profit certification programs, programs offered by trade and labor unions, as well as industry sponsored programs. GTA provided a list of these programs available to workers in the state as part of its Five-Year Action Plan and further discusses these programs herein.

Information regarding certifications, training, and licensing of key technical personnel submitted will be considered complementary to and not duplicative of the information and data submitted in other elements of the application. Applicants will be encouraged to cross-reference materials to avoid duplicative submissions.

5.12.6.3 Narrative description

Applicants will also be expected to provide a narrative description of the entity's experience designing and constructing broadband infrastructure projects of similar size and scope and experience operating the network to offer last mile services. This description should reference the key management personnel referenced in the prior application section as well as the experience and expertise of the technical teams the organizations will use to design, construct, and operate the proposed project.

5.12.6.4 Scoring Phase – project-specific certifications

As part of the Scoring Phase application process, GTA will require applicants to certify that they are technically qualified to complete and operate the Project and that they are capable of carrying out the funded activities in a competent manner, including that they will use an appropriately skilled and credentialed workforce.

Applicants must list the employment categories, job titles, and job descriptions that will be necessary to successfully complete the proposed project. Applicants will also be required to provide any additional certifications, licenses, or other qualifications that are unique and specific to the proposed project.

Applicants must provide supporting documentation to demonstrate that they have completed, or are in the process of completing, these additional requirements to become fully and properly qualified to successfully complete the proposed project. Applicants will also be required to submit a network design, diagram, project costs, build-out timeline and milestones for project implementation, and a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project.

The submitted materials will be reviewed by reviewers with subject matter expertise and will be given the opportunity to cure their submissions if any certifications and documentation are missing or lacking.

5.12.6.5 Scoring Phase – description of the proposed project

As part of the Scoring Phase process, applicants will be required to provide a detailed description of the proposed project. Applicants will be encouraged to review the Prioritization and Scoring Phase section of the application (discussed in Section 5.3 of this Initial Proposal Volume 2) to ensure that the project description submitted in this section of the application will satisfy program requirements and related scoring rubric elements.

This submission will consist of the following required elements:

- Network design and diagrams using shapefiles that display fiber routes, interconnect points, and required right of way usage.
- Narrative descriptions of the geographic location, characteristics of the local community, anticipated labor requirements, and other related information that will provide GTA with a complete picture of the community to be served.
- Descriptions of the proposed project's technical specifications and design, including project elements such as the proposed miles of fiber, number of interconnection points, technology types to be deployed, number of passings, and anticipated speeds and latency of the services to be offered over the completed network. A template for this requirement, hereinafter referred to as the Technical Specifications Template, will be provided by GTA.
- Deployment timelines and milestones that reflect a construction and installation process of no longer than four years, including planning, design, procurement, construction, installation, network turn-up and testing, and service initiation. A template for this requirement, hereinafter referred to as the Project Timeline Template, will be provided by GTA.
- In addition to the budget narrative and pro forma analysis provided as part of the showing of financial sustainability (including anticipated take rates over time, average revenue per user, churn, and other related elements), this section of the application will require applicants to provide documentation of project costs, operational costs, and budgets and to connect these showings to other sections of the application to create a comprehensive description of the proposed project and showing of technical and financial feasibility.

GTA will review the timelines and milestones for the proposed project to ensure that they correspond and map directly with the capital expenditures and schedules provided as part of the applicant's showing of financial sustainability for the project.

GTA will also preview the description of the proposed project's technical specifications, network design, and diagrams to ensure that the related project budgets, financial analysis, and business case pro forma analysis support the applicants' project-specific financial sustainability showing.

As each of these application elements must correspond and connect with each other to present a comprehensive picture of the proposal project, GTA intends these showings to be complementary and not duplicative. Applicants can reference attachments and information provided in other parts of the application.

5.12.6.6 Certification of a Professional Engineer

To support GTA's own analysis of an applicant's technical capabilities, as well as the reasonableness and benefits of the proposed project, the applicant will be required to produce a certification by an independent professional engineer or an in-house engineer who designs and oversees the implementation of networks during the Scoring Phase. GTA will require that the certifying engineer holds all required professional licenses.

GTA will provide a sample certification as part of the application materials. This certification must state that the engineer has reviewed all necessary elements of the proposed project, including descriptions and documentation of the network design, build-out timelines, business case, and budgets. The engineer must certify that the proposed project meets all applicable program requirements and is designed to be successfully completed and capable of meeting all performance commitments and requirements within the program timelines.

The applicant will be required to upload documentation of the professional engineer's licenses as well as any written reports, letters, or analysis provided by the engineer regarding the proposed project.

5.12.7 Compliance with applicable laws

GTA's application process will require applicants to certify that the organization is aware of the federal and state laws applicable to BEAD funded broadband deployment projects and that the organization possesses the qualifications and resources to perform BEAD-related commitments in compliance with all applicable federal and state laws.

Applicants will also be required to describe their current compliance with all relevant federal and state laws and describe any violations of applicable laws and regulations, current or pending investigations, and current or pending legal actions.

In the BEAD application supporting materials, GTA will reference the types of laws that applicants must consider, including federal procurement laws such as applicable Build America, Buy America requirements, Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. §1608), state-specific procurement regulations, federal Uniform Guidance regulations, Department of Commerce Standard Terms and Conditions for grant funding, federal and state environmental and historic preservation regulations, and any specific award conditions that GTA or NTIA may develop. GTA will also consult with other state and federal agencies to incorporate additional laws and regulations applicable to BEAD program projects. In the event of a conflict between federal, state, or local regulations, GTA will require compliance with the most stringent obligations and requirements to the extent those obligations are not preempted by applicable federal law.

GTA will also require applicants to provide a narrative description of the processes they have in place to conduct funding activities in compliance with federal and state laws, including descriptions and documentation of procurement practices. Additionally, applicants shall be required to provide an explanation of any special circumstances or considerations that may prevent compliance with specific applicable laws. The narrative must address specific requirements and discuss the applicant's plans to mitigate the impact of any noncompliance on its participation in the program.

GTA will further require applicants to certify that it has, or will have, processes in place to monitor and support compliance with specific state and federal safety regulations applicable to work on BEAD program projects, including federal Occupational Safety and Health Act and related state and federal regulations.

As part of this showing, GTA will require applicants to provide documentation of the organization's policies and practices regarding compliance with health and safety laws and regulations. Applicants will also be required to provide documentation of communications with workers and worker-representative organizations regarding the applicable labor laws and fair labor standards, as well as the formation of worker-led health and safety committees. Documentation of an applicant's outreach to workers on these topics may include sample emails, copies of posters, worker surveys, worker meetings, phone call and social media scripts, as well as organizing activities by worker-led organizations.

Because locations already subject to another enforceable deployment obligation are not eligible for BEAD, the State of Georgia has concerns that all other such obligations are honored. Simply put, the state is concerned that other federal obligations may block a location from BEAD eligibility in the near term and then be defaulted by the provider after the end of the BEAD subgrant process, leaving the locations in question without funding to receive service. Therefore,

as a separate step from any federal enforcement penalties, as part of its subgranting authority under the BEAD program, the State seeks to create a disincentive for any provider to subsequently abandon a deployment obligation that, as part of the BEAD deduplication process, excludes locations in Georgia from BEAD eligibility. Any BEAD subgrantee also subject to deployment obligations elsewhere in Georgia – including from programs such as RDOF, Enhanced-ACAM, ReConnect or any other similar program included in the BEAD deduplication process must make an enforceable commitment as part of its BEAD subgrant agreement not to default or otherwise fail to fulfill any such deployment obligation in the State of Georgia. The State of Georgia will however allow BEAD subgrantees the opportunity to justify a default in the event that extraordinary circumstances arise or when the provider can prove that the locations are already served.

5.12.8 Operational capability

5.12.8.1 Experience offering voice and broadband services

GTA will require applicants to provide a certification by an officer or director of the organization that it possesses the operational expertise, capabilities, and resources to successfully complete and operate a BEAD funded project. The certification must specify that the organization has at least two years of experience providing voice, broadband, or electric transmission or distribution services to end users or is a wholly owned subsidiary of a parent entity that has two years of operational experience in the communications industry.

If applicants reference operations in other states as part of its demonstration of managerial, technical, or operational capabilities, the organization will be required to provide a list or chart describing operations providing voice and broadband services in other states. The list must include licensing and certification identifiers, years of operating experience, and descriptions of the services provided in each state either by the organization directly or by its affiliates and parent organization.

GTA will also require applicants to provide a brief narrative or supporting documentation that details their approach to customer service and how they enact emergency responses to service interruptions and outages. Additional details could include feedback and accountability mechanisms for customer support, ease of understanding bills, and the availability of multilingual support for populations with language barriers.

5.12.8.2 Compliance with FCC regulations

Applicants will also be required to provide a separate certification that they are in compliance with any applicable federal laws and regulations implemented by the Federal Communications Commission (FCC), including submission of required reporting under the FCC's Form 477

regulations for reporting deployment and subscription data. This certification should also include compliance with the Broadband DATA Act (Pub. L. No 116-130 (2020)) and implementing regulations including the FCC's Broadband Data Collection process.

If the applicant cannot provide the required certification regarding these FCC regulations, it will be required to provide a narrative explanation of any pending or completed enforcement action, litigation, or other action regarding violations or non-compliance with applicable FCC regulations, and a description of any efforts by the organization to cure the noncompliance or violations of the applicable regulations.

5.12.8.3 Providers with less than two years of communications experience and new entrants

If the applicant is a provider without two years of experience offering communications services or is a new entrant to the communications market, the applicant will be required to provide additional documentation of its operational capabilities to successfully complete and operate a BEAD funded project.

Such documentation will be considered if it can substantiate the expertise and resources of the organization to deploy and operate a broadband network in compliance with BEAD program requirements. Such documentation could include additional operational or financial reports that the provider or new entrant may have originally submitted to a financial institution or applicable regulatory agency. These additional reports must be accompanied by a certification from an officer or director of the organization that they are true and correct copies of the reports originally provided to the financial institution or regulatory agency.

Providers and new entrants will also be required to provide documentation of plans to acquire additional resources to increase the organizations' organizational capabilities, including third-party contractors and partners with relevant operational expertise, to the extent that they cannot demonstrate that they have already acquired those capabilities. For the purposes of this section, the two-year time window begins when the applicant began verifiable operational efforts to build their networks that provide "last mile" service.

5.12.9 Ownership information

GTA will require applicants to document their ownership structure and shareholder interests consistent with federal regulations developed for specific funding and auction programs implemented by the FCC that can be found at 47 C.F.R. §1.2112(a)(1)-(7). GTA will specifically request applicants to provide a narrative description of their ownership structure and corporate entity type (e.g., publicly held corporation, limited partnership, limited liability company, general partnership, cooperative). The showing should reference and correspond to the organizational

charts, identification of executive leadership, and financial statements provided in other elements of the application.

Applicants will be required to submit a list of the required ownership information specific to the type of corporate entity, including the name, address, citizenship, and proportion of ownership interest of those owning and controlling the organization, including partners and shareholders with more than a 10 percent ownership interest.

For applicants that report to the FCC, GTA will review the submitted information to determine that it matches the information submitted by organizations to the FCC in compliance with 47 C.F.R. §1.2112 and other FCC reporting requirements including reporting for Eligible Telecommunications Carrier requirements, licensure, and other purposes. Applicants will be expected to identify and explain any discrepancies or inconsistencies in the reported ownership and corporate structure information between the information reported to the FCC and the information submitted.

GTA will also check the submitted information against relevant business licensing requirements for the State of Georgia and will require applicants to explain any discrepancies or inconsistencies between the two sets of reported data.

This requirement is critical for GTA, and NTIA, to uphold their commitments to fairness and transparency under the BEAD program. Ownership information for each prospective subgrantee will allow GTA to have a full and complete picture of the applicants in the program and who is being entrusted with BEAD funding to ensure an efficient and effective use of funds that benefits the largest number of end users.

5.12.10 Information on other public funding

As part of GTA's efforts to substantiate an applicant's overall expertise and competence to successfully complete a BEAD funded project, GTA will require applicants to submit information about their participation in other state or federal publicly funded grant programs.

GTA will assess this information to better understand the applicant's experience and knowledge regarding publicly grant funded programs, the technical capabilities demonstrated by the sophistication of each project, and the resources that the applicant has committed over the term of these projects.

Non-compliance with other state or federal publicly funded grant programs could negatively impact the ability of an applicant to receive BEAD funding.

Applicants will be required to submit information about their participation and commitments for publicly funded programs including but not limited to the Families First Coronavirus Response Act (Public Law 116-127; 134 Stat. 178), the CARES Act (Public Law 116-136; 134 Stat. 281), the Consolidated Appropriations Act, 2021 (Public Law 116-260; 134 Stat. 1182), the American Rescue Plan of 2021 (Public Law 117-2; 135 Stat. 4), any federal Universal Service Fund high-cost program (*e.g.*, RDOF, Connect America Fund), and GTA's own broadband grant programs, as well as any state or local universal service or broadband deployment funding program.

GTA will provide a template for this requirement, hereinafter referred to as the Other Public Funding Template, that applicants must complete. Applicants will be required to use the Other Public Funding Template to provide the requested information for each publicly funded broadband deployment project where the applicant is planning to submit an application for funding, has an application pending, has been awarded public funding, or has committed to completing a project. Applicants will also be required to include information about any publicly funded broadband projects for their affiliates and parent company.

As the Other Public Funding Template demonstrates, for each current publicly funded broadband project, GTA will require applicants to provide:

- Speed and latency of the service to be provided as measured and reported under the applicable rules of the program.
- Geographic area covered.
- Number of unserved and underserved locations committed to serve or a percentage of the number of locations in the area as measured and reported under the applicable rules of the program.
- Amount of public funding to be used.
- Cost of service to the consumer
- Matching commitment, if any, provided by the applicant or its affiliates.

6 Non-deployment subgrantee selection (Requirement 9)

This section outlines non-deployment eligible activities GTA may support using BEAD Program funds.

GTA does not anticipate having non-deployment subgrantees. The State of Georgia's estimate to provide universal service exceeds its BEAD allocation, so GTA does not anticipate having additional funds for other items. However, if the State does have remaining funds, GTA will ensure that the selection of entities will be open, competitive, and fair – in accordance with Georgia procurement rules and regulations – and to the extent feasible within NTIA-mandated timelines.

If, however, the State has additional funds after provisionally issuing the broadband grants, it will plan to fund non-deployment activities with its remaining funding. Consistent with the BEAD Notice of Funding Opportunity, GTA will consider supporting additional deployment and nondeployment activities related to the following:

1. Support and expand the State's implementation of the workforce development plan described in this Initial Proposal. This is listed first because the State is required to stand up a workforce program for BEAD.

2. Identify and connect unserved units in multiple-dwelling-unit (MDU) buildings with a minimum of 100/20 Mbps service, while assessing and upgrading the internal wiring to facilitate high-speed internet access for all units simultaneously. This will address the need, especially in urban areas, to ensure broadband connectivity for State residents living in MDUs, many of whom are low-income and members of other covered populations.

3. Support programs that alleviate barriers to digital connectivity, enabling economic empowerment, promoting academic success, and enhancing community health. These efforts will align with the State's Digital Equity Capacity Grant Program implementation goals, strategies, and activities.

4. Establish a competitive wireless tower grant program to fund infrastructure in areas lacking sufficient cellular service. This will enhance wireless accessibility and provide additional connectivity.

These three initiatives were identified because they represent the highest non-deployment broadband equity and access needs as identified through GTA's outreach and engagement with local governments, community organizations representing covered populations, industry and workforce organizations, and other stakeholders over the course of 2023. Because GTA will

continue its outreach, engagement, and coordination with stakeholders throughout BEAD Program deployment (as well as Digital Equity Capacity Grant Program implementation), should other uses of funding be raised as more effective in achieving BEAD's equity, access, and deployment goals, GTA will be positioned to responsively address these.

GTA has a limited window to run the state challenge process and select deployment grants in order to prepare its Final Proposal for public comment and review before submitting it to NTIA. NTIA has provided 365 days to complete this work. Given these time constraints, the State anticipates that it may need to use a faster process to support any workforce or digital connectivity-related non-deployment activities with any remaining funds. This means that the State may need to engage in any non-deployment activities directly through GTA, its contractors, or other state offices. However, GTA will ensure that the selection of entities will be open, competitive, and fair—in accordance with Georgia procurement rules and regulations—and to the extent feasible within NTIA-mandated timelines.

As GTA runs its subgrant selection process, it will monitor the remaining funds closely. If GTA determines that it may have funds remaining, it will begin planning and preparing a comprehensive non-deployment subgrantee selection to submit as part of its Final Proposal.

Though GTA does not anticipate that there will be funds available for non-deployment subgrantees, GTA would base any non-deployment subgrantee selection process on the deployment subgrantee selection process described above, incorporating any lessons learned during the deployment subgrantee selection process. Just as in the deployment subgrantee selection process, applicants in any non-deployment subgrantee selection process would need to demonstrate managerial, operational, and technical capability as well as compliance with relevant laws, for example.

GTA would establish evaluation criteria in advance and communicate the criteria to all potential applicants, relying in part on established partnerships with key stakeholders to ensure that all are informed. The same principles that guide the deployment subgrantee process, described in the Principles section above (Section 5.1.1—impact, simplicity, fairness, openness, transparency, and competition), would guide the design of GTA's non-deployment subgrantee selection process.

7 Eligible Entity implementation activities (Requirement 10)

This section describes initiatives that GTA proposes to implement as the recipient.

GTA only has 365 days to oversee multiple rounds of funding in order to finalize its plans to issue provisional grants designed to deploy broadband infrastructure to all unserved and if possible, all underserved locations. Given the limited time to administer the state challenge process and manage multiple rounds of grants to maximize BEAD funding to unserved and underserved locations, the State plans to implement key administrative and programmatic grant activities without issuing a subgrant. These activities will rely on existing staff and contractors with deep knowledge of the activities that need to be conducted, and for which a competitive procurement process could lead to substantial delays both due to procurement and ramp-up of knowledge and capabilities. In addition, there is a highly limited set of appropriate and currently operational software packages able to support the complex and unique requirements of BEAD challenge and grants management process, and these need to be compatible with existing data management platforms and skills used by the State. The activities needed include:

- General administration of the BEAD award
- Oversight of BEAD subgrant applications and issuance
- Other BEAD management processes such as:
    - Implementing the challenge process.
    - Managing the processes for subgrantee applications and issuance.
    - Obtaining software to manage both processes.
    - Overseeing subgrantee compliance.

8 Labor standards and protection (Requirement 11)

This section explains how GTA will account for and oversee subgrantee adherence to federal labor and employment laws that mandate minimum safety, wage, anti-discrimination, and other workplace standards for all businesses in the United States.

8.1 Specific information that prospective subgrantees will be required to provide in their applications and how the Eligible Entity will weigh that information in its competitive subgrantee selection processes

In the application and as part of subgrantee reporting, GTA will require the following from all applicants:

1. Certification from an Officer or Director-level employee, or an equivalent, of consistent past compliance with federal labor and employment laws on broadband deployment projects in the last three years, including:
    - Certification that the prospective subgrantee, as well as its contractors and subcontractors, have not been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years, or
    - Disclosure of any findings of such violations.
2. Certification that the potential subgrantee has existing labor and employment practices in place and that the subgrantee will recertify this annually for the duration of the BEAD implementation period, including:
    - Applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the network.
    - Certification that the potential subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects and that the applicant will recertify this annually for the duration of the BEAD implementation period.
    - Certification that the subgrantee will ensure that all contractors and subcontractors also meet these requirements.

- Project employment and local impact reports where Davis Bacon certification is not provided.

3. Discussion of the potential subgrantee's workforce plan, including information on training and safety, job quality, local hire and targeted hire, accountability and subcontracting practices, and ongoing operational workforce

4. Discussion of current and planned future practices regarding using a directly employed workforce, robust in-house training, wages and benefits, and a locally based workforce.

5. Current and planned future practice regarding public disclosure of workforce plans and labor commitments on a website or online portal.

6. Discussion of job quality considerations as part of the applicant's workforce development strategies.

7. Discussion of track record and commitment to maintaining high standards of workplace safety practices, training certification or licensure for all relevant workers, and compliance with state and federal workplace protections.

8. Certification of compliance with relevant workplace protections including the Occupational Safety and Health Act, the Fair Labor Standards Act, Title VII of the Civil Rights Act of 1964, relevant safety standards as determined by GTA including the National Electrical Safety Code, and Georgia state labor and employment laws.

9. Discussion of whether the construction workforce will be directly employed or subcontracted, the anticipated size of the workforce required to carry out the proposed work, a description of plans to maximize use of local or regional workforce, and a description of the expected workplace safety standards and training to ensure the project is completed at a high standard.

With respect to all materials and information provided, GTA will review and evaluate the applicant based on the following:

1. Completeness. Are the materials complete and fully responsive to the request?

2. Sufficiency. Do the materials demonstrate the appropriate level of compliance and adherence to the standards and statutes measured by a review of the documentation provided compared to the Wage Determination website at sam.gov as the source for Davis Bacon Act (DBA) general wage determinations. Alternatively, the state will collect the project employment and local impact report detailing:

3. • The number of employees of contractors and sub-contractors working on the project; • The number of employees on the project hired directly and hired through a third party; • The wages and benefits of workers on the project by classification; and

   • Whether those wages are at rates less than those prevailing. Recipients must maintain sufficient records to substantiate this information upon request.

4. The State of Georgia through the Governor's Office of Planning and Budget has assessed Davis Bacon requirements through Coronavirus State Fiscal Recovery Funds and Capital Projects Funds. Previous documentation of this process can be found at https://opb.georgia.gov/covid-response.

5. Concerns. Are there any omissions or other indications that should raise concerns about the potential subgrantee's, or its contractors' and subcontractors', track records and commitment to the standards or statutes?

Based on GTA's evaluation of these considerations, the applications will be placed into two categories: (1) for those categories that are deemed complete and sufficient and do not raise any concerns, points will be awarded pursuant to the scoring rubric with 10 available points in the compliance with federal fair labor laws section; (2) for those applications that raise concerns based on omissions or other indications, GTA will provide clarifying questions to the applicant in writing while affording seven calendar days for the applicant to respond and, upon receipt of the responses, then award points pursuant to the scoring rubric with 10 available points in the compliance with federal fair labor laws section.

8.2 Binding legal commitments in subgrants related to labor standards and protection

Following an award, successful applicants will be required to submit ongoing workforce reports, through project employment and local impact reports or Davis Bacon documentation which shall be incorporated as material conditions of their subgrant from GTA. The applicants' representations in the Workforce Plan section of their application (described in sections 5.3.1 and 5.12.7) will become binding commitments to the labor standards requirement upon award of a subgrant, and the subgrantees will be subject to regular reviews to ensure compliance.

In the event that successful applicants fail to meet the Program Requirements or Workforce Plan Data requirements, or otherwise falsify information regarding such requirements, GTA shall investigate the failure and issue an appropriate action allowable by law.

To encourage public confidence in the program, applicants' disclosures responding to the workforce criteria will be publicly available on GTA's website.

Subgrantees shall be required to provide in regular reports the below information. This information may be anonymized and aggregated to protect individual privacy:

- Any updates to Davis Bacon or Project Employment and Local Impact reports.
- Whether the workforce will be directly employed by the subgrantee/ISP or whether work will be performed by a subcontracted workforce.
- The entities that the subgrantee plans to subcontract with in carrying out the proposed work, if any.
- The job titles and size of the workforce (FTE positions) required to carry out the proposed work over the course of the project.
- For each job title required to carry out the proposed work, a description of wages, benefits, applicable wage scales including overtime rates and a description of how wages are calculated.
- Any in-house training program, including whether the training program is tied to titles, uniform wage scales, and skill codes recognized in the industry; and safety training, certification, and/or licensure requirements, including whether employees are required to have completed OSHA safety training or any training required by law.

9 Workforce readiness (Requirement 12)

Georgia's success in executing broadband deployments under the BEAD Program will require unprecedented collaboration across the public, private, and non-profit sector, particularly with regards to developing a robust, well-trained Georgia workforce. This section explains how GTA will ensure an available, diverse, and highly skilled workforce.

This section outlines the workforce needs that will be created by the spending on broadband construction under the BEAD Program, outlines the State's approach to helping foster a robust, qualified workforce, documents how GTA intends to meet the labor and workforce requirements in the BEAD NOFO, and describes how BEAD deployments will benefit and work in concert with the State's long-term economic development goals.

9.1 Establishing a baseline for the broadband construction sector in Georgia

According to a 2021 Brookings report, "How federal infrastructure investment can put America to work," the workforce clusters involved in broadband deployment are represented by the following North American Industry Classification System (NAICS) categories:

- Power and Communication Line and Related Structures Construction
- Fiber Optic Cable Manufacturing
- All Other Electrical Equipment and Component Manufacturing
- Cable and Other Subscription Programming
- Wired Telecommunications Carriers
- Wireless Telecommunications Carriers[8]

The following table generated using data from the economic and labor market modeling tool Lightcast, [9] outlines the performance of these subsectors that are directly employed in telecommunications in Georgia from 2018 to 2022. (Note: the data nomenclature used by the NAICs changed between the publication of the 2021 Brookings report and now; the category

[8] The Broadband Deployment Sector is defined by the March 2021 Brookings Report, "How Federal Infrastructure Investment Can Put America to Work" (https://www.brookings.edu/research/how-federal-infrastructure-investment-can-put-america-to-work/). These industries were originally identified by Pollin, et. al. in the October 2020 report, "Impacts of the Reimagine Appalachia & Clean Energy Transition Programs for Ohio" from the Political Economy Research Institute at the University of Massachusetts, Amherst (https://reimagineappalachia.org/wp-content/uploads/2020/10/Pollin-et-al-OHIO-Reimagine-Appalachia-and-Clean-Energy-Programs-10-19-20.pdf).

[9] Lightcast, https://www.economicmodeling.com/.

formerly called *Cable and Other Subscription Programming* is now called *Media Streaming Distribution Services, Social Networks, and Other Media Networks and Content Providers.*)

Table 4: Performance of Georgia's broadband deployment sector (2018 – 2022)

NAICS	Industry	2018 jobs	2022 jobs	2018 - 2022 change	2018 - 2022 % change	Avg earnings per job - Georgia	Avg earnings per job - national
237130	Power and Communication Line and Related Structures Construction	11,664	12,064	400	3%	$103,665	$108,440
335921	Fiber Optic Cable Manufacturing	34	1,113	1,079	3174%	$99,521	$109,335
335999	All Other Electrical Equipment and Component Manufacturing	152	135	-17	-11%	$122,244	$122,081
516210	Media Streaming Distribution Services, Social Networks, and Other Media Networks and Content Providers	5,248	4,905	-343	-7%	$123,611	$239,987
517111	Wired Telecommunications Carriers	29,233	22,017	-7,216	-25%	$132,546	$126,979
517112	Wireless Telecommunications Carriers (except Satellite)	5,844	4,159	-1,685	-29%	$126,032	$126,584
	Total	**52,176**	**44,393**	**-7,783**	**-15%**	**$122,240**	**$147,794**

Source: Lightcast Datarun 2023.3

There has been significant dynamism within Georgia's broadband deployment sector in the past five years, and the data suggest a few notable trends:

- The growth in *Power and Communication Line and Related Structures Construction* roles suggests ongoing active construction or utility repair in the state, and functioning mechanisms for training and hiring new workers in the field.
- The decline in both *Wired* and *Wireless Telecommunications Carriers* is likely the result of a number of factors, which may include an increased use of technology in ISP operations resulting in less reliance on people, or simply an increase in retirements in the industry, among other factors.
- The unprecedented increase in *Fiber Optic Cable Manufacturing* reflects significant investments in manufacturing capacity and facilities in the state.

Overall, however, the state saw a reduction of almost 8,000 jobs in industries related to broadband deployment during this timeframe, which was significantly greater than national

trends. Georgia saw a 15 percent reduction in the broadband deployment workforce, while the same sector shrank by 4 percent nationally over the same timeframe. Earnings in the state are roughly comparable to national averages in every category except *Media Streaming Distribution Services*, suggesting a fairly competitive compensation environment for most roles.[10]

9.2 Estimating the impact of BEAD on broadband construction jobs

This analysis estimates that the construction spending due to the BEAD Program will be approximately $1.6 billion, reflective of the entire BEAD allocation for Georgia plus 20 percent. Because the BEAD construction is happening with significant overlap with Capital Projects Fund supported broadband construction, this analysis also includes an analysis that adds to BEAD the anticipated spending in the state from CPF—projected to be about $300 million including match. (The ultimate amount spent on construction may be higher or lower depending on how much match can be catalyzed for each deployment—with some projects including 25 percent match or more, and some high-cost areas potentially necessitating much lower match; however, $1.9 billion in construction spending is proportionally accurate for the analysis at this time.)

Based on the Brookings research cited above, broadband construction activities are expected to be allocated in the following proportions across the following relevant industry sectors.[11,12]

Table 5: Anticipated distribution of broadband investment across sectors

NAICS	Industry	Weight
237130	Power and Communication Line and Related Structures Construction	25%
335921	Fiber Optic Cable Manufacturing	10%
335999	All Other Electrical Equipment and Component Manufacturing	15%
516210	Media Streaming Distribution Services, Social Networks, and Other Media Networks and Content Providers	10%
517111	Wired Telecommunications Carriers	20%
517112	Wireless Telecommunications Carriers (Except Satellite)	20%

[10] Lightcast Datarun 2023.3.
[11] The distribution of how this investment across broadband industries was based on the work of the Brookings Report *How Federal Infrastructure Investment Can Put America to Work*, by Escobari, Gandhi, and Strauss, from June 2021, which is based on the work of Pollin et al. (2020).
[12] Robert Pollin, Jeannette Wicks-Lim, Shouvik Chakraborty, and Gregor Semieniuk, "Impacts of the Reimagine Appalachia & Clean Energy Transition Programs for Ohio: Job Creation, Economic Recovery, and Long-Term Sustainability," *PERI at University of Massachusetts Amherst*, October 2020, p. 107.

Using the anticipated impact across sectors, an input-output methodology with the modeling tool Lightcast was used to understand and analyze the workforce needs based on anticipated broadband spending.

9.2.1 Broadband construction spending will require Georgia to grow their broadband construction workforce by over 1,000 jobs

Though many occupation categories may be involved in broadband deployment in some form or another, this analysis focuses on 12 occupational categories required to deploy broadband, identified by the Brookings article cited above. The following table estimates the numbers of workers needed in those categories to execute on a $1.6 billion or $1.9 billion investment in broadband construction, and the proportional increase in workforce needed for each occupation.

Table 6: Estimated workforce requirements for broadband deployment occupations

Occupation	Currently employed in Georgia	$1.6 billion investment		$1.9 billion investment	
		New workers needed	% increase	New workers needed	% increase
Project Management Specialists	22,913	86	0.38%	101	0.44%
Business Operations Specialists, All Other	75,494	137	0.18%	162	0.21%
Software Developers	54,532	117	0.21%	139	0.25%
Software Quality Assurance Analysts and Testers	5,229	12	0.23%	14	0.27%
Electronics Engineers, Except Computer	3,600	24	0.67%	28	0.78%
Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	37,465	142	0.38%	167	0.45%
Customer Service Representatives	112,265	216	0.19%	257	0.23%
Construction Laborers	26,381	374	1.42%	443	1.68%
First-Line Supervisors of Mechanics, Installers, and Repairers	21,321	152	0.71%	180	0.84%
Telecommunications Equipment Installers and Repairers, Except Line Installers	8,827	111	1.26%	132	1.50%
Electrical Power-Line Installers and Repairers	3,716	123	3.31%	146	3.93%
Telecommunications Line Installers and Repairers	2,189	74	3.38%	87	3.97%

Source: Lightcast Datarun 2023.3

Because this chart is based on job classifications regardless of industry (as in, inclusive of more industries than just those in the broadband deployment sector), there are significantly more employees noted for each job category than in the previous chart, which only included workers employed at broadband deployment-related businesses. For example, a significant number of lineworkers may be working for electric utilities rather than telecommunications companies. However, this chart gives perspective as to the pool of people who could be drawn upon to work—and which categories may be hardest to supply as a percentage of the existing workforce. In Georgia's case, *Telecommunications Line Installers and Repairers* and *Electrical Power-Line Installers and Repairers* will both need to grow by 3 to 4 percent—a significant margin above existing employment levels.

Another factor that impacts how difficult it will be to grow the net workforce in a particular category is how concentrated that workforce is relative to a national baseline in a particular area. When there are notable existing higher-density clusters, not only is filling roles easier with the existing workforce, but there is more possibility for specialization, mentorship, and even recruitment due to an increased visibility in the community. To demonstrate this, a Location Quotient (LQ) analysis is used to show the relative concentration of an occupation compared to national averages, and as such, which roles may be especially hard to fill. An LQ of 1.00 means an occupation is exactly as concentrated in a region as it is in the whole country. An LQ higher than 1.00 means there is a higher concentration of that occupation in the region (and thus more opportunity for specialization, and more resilience when an influx of these occupations is needed, and more of an existing network in the community), while an LQ less than 1.00 represents a lower concentration (and therefore could be considered a greater scarcity issue in times of occupational need).

Table 7: Occupations needed for broadband deployment

Occupation	% occupational increase required	Location quotient
Telecommunications Line Installers and Repairers	3.97%	0.64
Electrical Power-Line Installers and Repairers	3.93%	0.97
Construction Laborers	1.68%	0.83
Telecommunications Equipment Installers and Repairers, Except Line Installers	1.50%	1.67
First-Line Supervisors of Mechanics, Installers, and Repairers	0.84%	1.22
Electronics Engineers, Except Computer	0.78%	1.04
Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	0.45%	1.10

Occupation	% occupational increase required	Location quotient
Project Management Specialists	0.44%	0.86
Software Quality Assurance Analysts and Testers	0.27%	0.84
Software Developers	0.25%	1.12
Customer Service Representatives	0.23%	1.24
Business Operations Specialists, All Other	0.21%	2.17

Source: Lightcast Datarun 2023.3

While many of these impacted occupations are at or above national levels of concentration, there are several that are well below, indicating those roles may also be especially hard to fill as more broadband deployment demand is generated across the country. Of particular concern are *Telecommunications Line Installers and Repairers* (LQ of 0.64) and *Construction Laborers* (LQ of 0.83). This reinforces the need for increased workforce development for those areas.

9.2.2 Characteristics of key workforce categories

Understanding how to create a robust workforce across key categories requires understanding important characteristics of those job categories such as the average earnings, change in number of employees over the past few years, and importantly, the turnover rate. High turnover rates, which could be represented by people switching jobs or retirements—both of which are trends in parts of the broadband deployment sector—impact the efficiency of organizations by requiring more frequent hiring and training and losing employees with context and experience. The chart below outlines important characteristics of the occupations identified as in need of critical workforce attention.

Table 8: Characteristics of key occupations impacted by broadband investment

Occupation	Currently employed in Georgia	2018 - 2022 % change	Median annual earnings	Annual turnover rate
Project Management Specialists	22,913	143%	$98,821	58%
Business Operations Specialists, All Other	75,494	123%	$66,685	69%
Software Developers	54,532	38%	$122,429	46%
Software Quality Assurance Analysts and Testers	5,229	30%	$99,819	55%
Electronics Engineers, Except Computer	3,600	-22%	$107,723	37%
Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	37,465	7%	$56,160	82%

Occupation	Currently employed in Georgia	2018 - 2022 % change	Median annual earnings	Annual turnover rate
Customer Service Representatives	112,265	2%	$35,734	114%
Construction Laborers	26,381	-8%	$36,026	82%
First-Line Supervisors of Mechanics, Installers, and Repairers	21,321	30%	$64,917	58%
Telecommunications Equipment Installers and Repairers, Except Line Installers	8,827	-13%	$57,034	50%
Electrical Power-Line Installers and Repairers	3,716	-23%	$66,394	40%
Telecommunications Line Installers and Repairers	2,189	-6%	$47,278	52%

Source: Lightcast Datarun 2023.3

While most of these occupations have seen growth from 2018 to 2022, several occupations have contracted in numbers, particularly *Telecommunications Equipment Installers and Repairers, Telecommunications Line Installers and Repairers*, *Electrical Power-Line Installers and Repairers,* and *Electronics Engineers*. This could be due to retirements, technology changes rendering some jobs obsolete, reclassification of occupations, contractions in the industry, or being lured out of state by more lucrative opportunities. While some workers may be enticed back out of retirement or brought back into the industry despite a previous contraction, a large number are likely out of the sector for good.

Turnover rates also give context for how often employees in each occupation are moving to different employers. High rates of turnover in certain categories should not be a cause for alarm, but instead generally indicate occupations where contract work is most common, such as seasonal work in construction and other occupations related to broadband deployment. To some extent, turnover also illustrates there are opportunities for employment elsewhere with a similar skill set and is a sign of a strong job market. However, the intensity and physical demands of broadband construction jobs are unavoidable, and so higher turnover rates are to some extent unavoidable.

9.2.3 Workforce qualification requirements

The following chart outlines qualification requirements for the 12 key broadband deployment occupations, along with typical education and work experience requirements, and typical amount of on-the-job training required to be proficient.

Table 9: Work experience of occupations impacted by broadband investment

Occupation	Typical entry-level education	Work experience required	On-the-job training required
Project Management Specialists	Bachelor's degree	None	None
Business Operations Specialists, All Other	Bachelor's degree	None	None
Software Developers	Bachelor's degree	None	None
Software Quality Assurance Analysts and Testers	Bachelor's degree	None	None
Electronics Engineers, Except Computer	Bachelor's degree	None	None
Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	High school diploma or equivalent	None	Moderate-term
Customer Service Representatives	High school diploma or equivalent	None	Short-term
Construction Laborers	No formal educational credential	None	Short-term
First-Line Supervisors of Mechanics, Installers, and Repairers	High school diploma or equivalent	Less than five years	None
Telecommunications Equipment Installers and Repairers, Except Line Installers	Postsecondary nondegree award	None	Moderate-term
Electrical Power-Line Installers and Repairers	High school diploma or equivalent	None	Long-term
Telecommunications Line Installers and Repairers	High school diploma or equivalent	None	Long-term

Source: Lightcast Datarun 2023.3

9.2.4 Current unemployment metrics

Though unemployment numbers are only aggregated at more general occupation classification levels, some inferences can be made as to how current unemployment numbers may impact ability to fill open positions in broadband construction.

The chart below outlines the total number of unemployed workers in Georgia by major occupation category, the share of all unemployed people in Georgia represented by that

category, and the comparable percentage of all unemployed people in that category for the nation. In other words, while 1 percent of unemployed people in Georgia are from the Construction and Extraction occupations, 13 percent of people nationally who are unemployed are from that category, showing a proportionally smaller availability of those workers in Georgia compared to the nation.

Table 10: Unemployment for occupations impacted by broadband investment

Occupation	Unemployed in Georgia (April 2023)	% of state unemployment	% of national unemployment
Business and Financial Operations Occupations Project Management Specialists Business Operations Specialists, All Other	28,945	20%	6%
Computer and Mathematical Occupations Software Developers Software Quality Assurance Analysts and Testers	2,432	2%	3%
Architecture and Engineering Occupations Electronics Engineers, Except Computer	3,802	3%	1%
Sales and Related Occupations Sales Representatives of Services	6,975	5%	8%
Office and Administrative Support Occupations Customer Service Representatives	17,277	12%	13%
Construction and Extraction Occupations Construction Laborers	1,803	1%	13%
Installation, Maintenance, and Repair Occupations First-Line Supervisors of Mechanics, Installers, and Repairers Telecommunications Equipment Installers and Repairers Electrical Power-Line Installers and Repairers Telecommunications Line Installers and Repairers	1,564	1%	4%

Source: Lightcast Datarun 2023.3

This analysis suggests that in Georgia, some of the business and support roles have higher proportional unemployment, and therefore open roles in that category may be easier to fill.

However, occupations in *Installation, Maintenance, and Repair*, which includes much of the telecommunications and construction roles that will be needed for BEAD deployments, comprise a low percentage of the unemployed population in the nation, and still a lower percentage of unemployed of the unemployed population in Georgia, further indicating that these roles will be harder to fill.

Staffing shortages can also be examined via job postings. The chart below outlines average monthly postings versus average monthly hires. Hiring data are calculated using a combination of Lightcast jobs data, information on separation rates from the Bureau of Labor Statistics (BLS), and industry-based hiring data from the Census Bureau.

Table 11: Occupations impacted by broadband investment, job postings vs. hires (2022)

Occupation	Avg monthly postings (Jan – Dec 2022)	Avg monthly hires (Jan – Dec 2022)
Project Management Specialists	830	1,325
Business Operations Specialists, All Other	190	4,150
Software Developers	4,028	2,829
Software Quality Assurance Analysts and Testers	404	328
Electronics Engineers, Except Computer	51	123
Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	286	2,907
Customer Service Representatives	2,716	10,869
Construction Laborers	367	2,030
First-Line Supervisors of Mechanics, Installers, and Repairers	575	1,138
Telecommunications Equipment Installers and Repairers, Except Line Installers	182	446
Electrical Power-Line Installers and Repairers	75	142
Telecommunications Line Installers and Repairers	101	133

Source: Lightcast Datarun 2023.3

One challenge to using job postings alone to quantify the hiring gaps is that hiring does not happen on a 1:1 ratio with postings. Within many occupations, more hiring is happening than job postings are listed, suggesting that hiring occurs via direct recruitment, re-hires, contractors, career fairs, or directly from training or educational programs. In addition, it is common for large firms to use one posting to hire multiple roles at the same position and at the same time. That

said, postings and hiring are a useful way to understand almost in real time what specific roles are the most sought after and needed across the state.

9.2.5 Current training programs at public institutions in Georgia

Developing a diverse and highly skilled workforce to meet the needs above requires a coordinated effort across the public and private sector. Georgia is fortunate in that one of the pre-eminent electrical and fiber lineworker training centers in the country—the Southeast Lineman Training Center—is located in the state. However, robust training programs at public institutions are also present in Georgia as well through the Technical College System of Georgia (TCSG).

The following is a list of institutions and relevant graduates generated by accessing the Integrated Postsecondary Education Data System (IPEDS).[13]

Table 12: Broadband workforce training programs at higher education institutions

Institution	Degrees	Associated occupations	County	Degrees granted in 2022
Albany Technical College	Customer Service Support/Call Center/Teleservice Operation	Customer Service Representatives	Dougherty County	5
Albany Technical College	Operations Management and Supervision	First-Line Supervisors of Mechanics, Installers, and Repairers	Dougherty County	9
Atlanta Technical College	Lineworker	First-Line Supervisors of Mechanics, Installers, and Repairers; Electrical Power-Line Installers and Repairers	Fulton County	15
Atlanta Technical College	Selling Skills and Sales Operations	Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	Fulton County	13
Brenau University	Operations Management and Supervision	First-Line Supervisors of Mechanics, Installers, and Repairers	Hall County	1
Central Georgia Technical College	Customer Service Support/Call	Customer Service Representatives	Houston County	253

[13] Because the IPEDs data are collected using Classification of Instructional Programs (CIP) codes rather than the NAICs classification, a CIPs to NAICs crosswalk was used to identify programs training workers relevant to broadband deployment occupations.

Institution	Degrees	Associated occupations	County	Degrees granted in 2022
	Center/Teleservice Operation			
Coastal Pines Technical College	Lineworker	First-Line Supervisors of Mechanics, Installers, and Repairers; Electrical Power-Line Installers and Repairers	Ware County	44
Coastal Pines Technical College	Retailing and Retail Operations	Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	Ware County	1
Columbus Technical College	Customer Service Support/Call Center/Teleservice Operation	Customer Service Representatives	Muscogee County	1
Georgia Institute of Technology-Main Campus	Electrical and Electronics Engineering	Electronics Engineers, Except Computer	Fulton County	523
Georgia Military College	Operations Management and Supervision	First-Line Supervisors of Mechanics, Installers, and Repairers	Baldwin County	33
Georgia Northwestern Technical College	Customer Service Support/Call Center/Teleservice Operation	Customer Service Representatives	Floyd County	8
Georgia Northwestern Technical College	Operations Management and Supervision	First-Line Supervisors of Mechanics, Installers, and Repairers	Floyd County	13
Georgia Piedmont Technical College	Communications Systems Installation and Repair Technology/Technician	Telecommunications Equipment Installers and Repairers, Except Line Installers; Telecommunications Line Installers and Repairers	DeKalb County	1
Georgia Piedmont Technical College	Retailing and Retail Operations	Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	DeKalb County	1
Georgia Southern University	Electrical and Electronics Engineering	Electronics Engineers, Except Computer	Bulloch County	66
Herzing University-Atlanta	Customer Service Support/Call	Customer Service Representatives	Fulton County	12

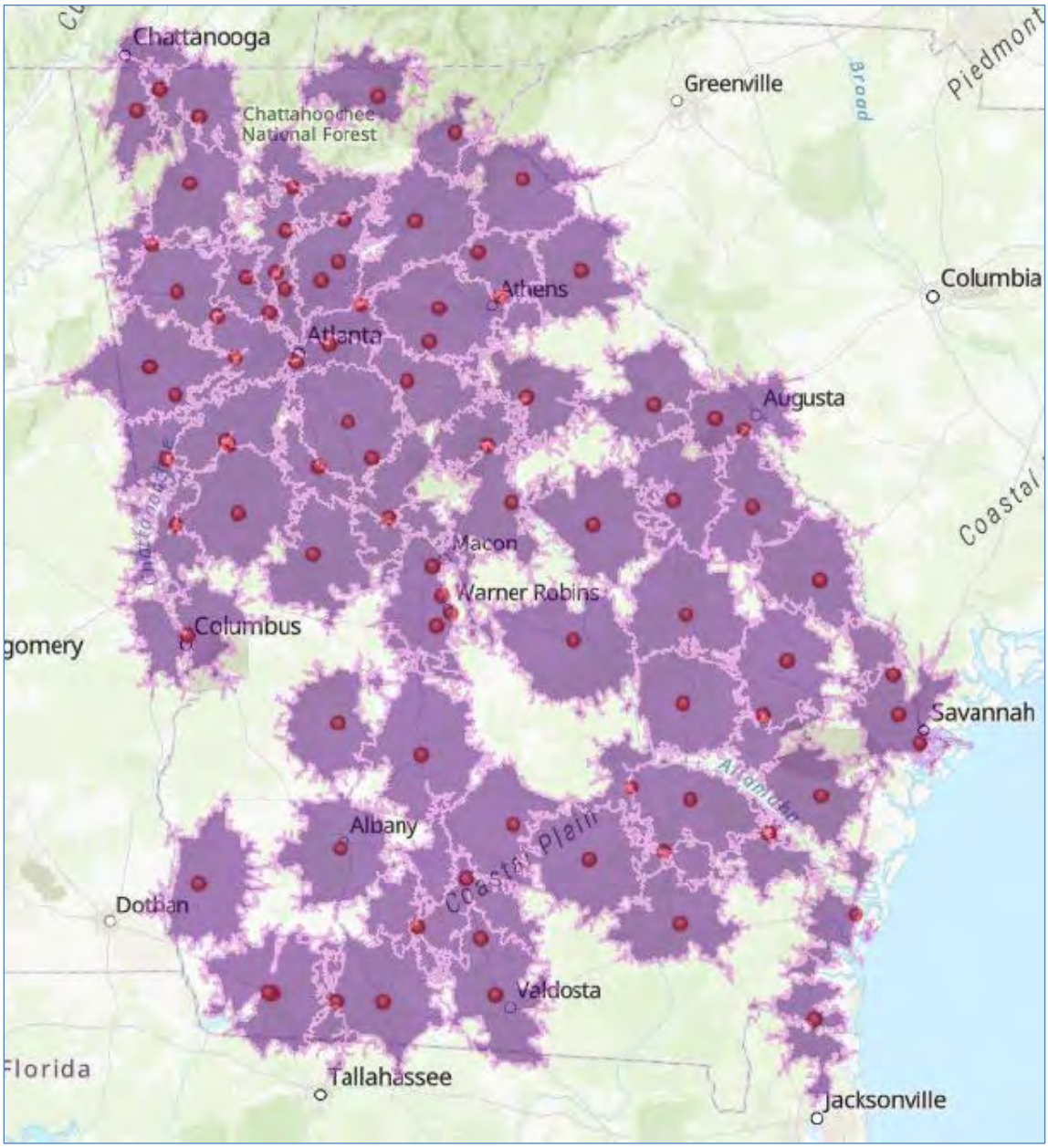
Institution	Degrees	Associated occupations	County	Degrees granted in 2022
	Center/Teleservice Operation			
Kennesaw State University	Electrical and Electronics Engineering	Electronics Engineers, Except Computer	Cobb County	103
Lanier Technical College	Electrical and Power Transmission Installation/Installer, General	First-Line Supervisors of Mechanics, Installers, and Repairers; Electrical Power-Line Installers and Repairers	Hall County	18
Lanier Technical College	High Performance and Custom Engine Technician/Mechanic	First-Line Supervisors of Mechanics, Installers, and Repairers	Hall County	40
Mercer University	Electrical and Electronics Engineering	Electronics Engineers, Except Computer	Bibb County	14
North Georgia Technical College	Lineworker	First-Line Supervisors of Mechanics, Installers, and Repairers; Electrical Power-Line Installers and Repairers	Habersham County	94
Point University	Operations Management and Supervision	First-Line Supervisors of Mechanics, Installers, and Repairers	Troup County	6
Savannah Technical College	Electrical and Power Transmission Installation/Installer, General	First-Line Supervisors of Mechanics, Installers, and Repairers; Electrical Power-Line Installers and Repairers	Chatham County	1
South Georgia Technical College	High Performance and Custom Engine Technician/Mechanic	First-Line Supervisors of Mechanics, Installers, and Repairers	Sumter County	14
South Georgia Technical College	Lineworker	First-Line Supervisors of Mechanics, Installers, and Repairers; Electrical Power-Line Installers and Repairers	Sumter County	52
South Georgia Technical College	Selling Skills and Sales Operations	Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	Sumter County	4
Southern Regional Technical College	Lineworker	First-Line Supervisors of Mechanics, Installers, and Repairers; Electrical Power-Line Installers and Repairers	Thomas County	1
Southern Regional Technical College	Operations Management and Supervision	First-Line Supervisors of Mechanics, Installers, and Repairers	Thomas County	10

Institution	Degrees	Associated occupations	County	Degrees granted in 2022
University of Georgia	Electrical and Electronics Engineering	Electronics Engineers, Except Computer	Clarke County	40
Wiregrass Georgia Technical College	Communications Systems Installation and Repair Technology/Technician, Customer Service Support/Call Center/Teleservice Operation	Telecommunications Equipment Installers and Repairers, Except Line Installers; Telecommunications Line Installers and Repairers; Customer Service Representative	Lowndes County	42

Though these data do not capture graduates from private training programs such as the Southeast Lineman Training Center, technical high schools, or public post-secondary programs that are currently being planned or have been implemented after the last year of available data, they do give an indication of the long-standing programs in the state that are producing trainees able to fit into certain roles.

Another important aspect to consider with training programs is their geographic distribution around the state. While some professions related to broadband construction, like Fiber Network Engineers (which are produced under the Electrical and Electronics Engineering category), can effectively operate remotely, others, like lineworkers and installers, are most valuable if they are available across the State to reduce travel and better achieve local hiring goals. To illustrate potential geographic gaps in training, the following map shows a 30-minute drive-time around public institutions that are producing trainees needed for field work.

Figure 2: 30-minute drive time around public institutions training roles relevant to field work in broadband construction[14]



[14] Sources: 2022 IPED; drivetime derived using OpenStreetMap; basemap © 2020 Google.

9.3 Continuing to support equitable onramps to broadband jobs and workforce development in Georgia

All stakeholders consulted about workforce issues in Georgia agreed that the biggest problem they are facing is workforce shortages. Indeed, Georgia's large BEAD allocation (the ninth highest of any state in the country) means that the amount the workforce needs to grow is substantial. The State has performed several workforce analyses over the past few years, all of which affirm the need for a meaningful expansion of the workforce. To that end, in alignment with NTIA Guidance 2.8.1 part a and part c, the State endeavors to play an active role in ensuring that Georgia's workforce is ready to meet the needs of the BEAD deployment by working to increase the scale of the qualified, diverse workforce in the state and by promoting sector-based partnerships.

As part of the State's stakeholder engagement for BEAD, GTA engaged with labor unions and workforce organizations and will continue to do so through all phases of BEAD deployment.

Wrap-around services can bring into the workforce people who otherwise would be unable to participate. In addition to the coordination between trainers and providers described below, the State will work with the broadest definition of workforce readiness groups and will disseminate information about these opportunities as part of its continuing outreach and engagement.

The assets identified in the State's Digital Connectivity Plan can increase the reach of the State's BEAD outreach and engagement by ensuring that information about high-quality job opportunities reaches covered populations. For example, Goodwill of North Georgia (https://goodwillng.org/serves low-income persons and provides digital literacy training, career programs, and internet access.[15] A sector-focused training program offered by Goodwill of North Georgia, Electrical Vehicle Supply Equipment (EVSE) Technician, is an example of a program delivered via partnerships that provides wraparound services such as transportation and mentoring as well as tools and uniforms—and earn-while-you-learn training (see "Get Paid to Train to Be an Electric Car Charging Station Tech," Goodwill of North Georgia, https://goodwillng.org/wp-content/uploads/2024/01/GCTA-EVSE-Participant-Recruiting-Flyer-Final-11.29.23.pdf).[16] Goodwill of North Georgia promotes this program to the people it serves.

Should the workforce of subgrantee, contractor or subcontractor not be unionized, GTA will require the subgrantee to provide the following with respect to the non-union workforce:

[17] "WBE and MBE Certifications in Georgia," Georgia Department of Economic Development, https://www.georgia.org/small-business/mean-wbe-mbe-certified.
[17] "WBE and MBE Certifications in Georgia," Georgia Department of Economic Development, https://www.georgia.org/small-business/mean-wbe-mbe-certified.

- The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce
- For each job title required to carry out the proposed work (including contractors and subcontractors), a description of:
    - Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles
    - Information on the professional certifications and/or in-house training in place to ensure deployment activities meet a high standard

The State affirms a few strategies employed in the industry, best practices demonstrated by the training providers locally and nationally noted above. These best practices are critical to combatting worker shortages, retention challenges, and increasing retirement due to an aging workforce, all of which are present in much of the broadband construction sector.

- **Apprenticeships and on-the-job training programs:** Apprenticeship models for industries where apprenticeships exist (i.e., for electricians and for lineworkers), as well as on-the-job training programs for all industries, provide benefits to both employees and employers. Employers can train people in their systems correctly from the beginning of their career and evaluate employees during introductory periods for the qualities that will set them up for long-term success. Furthermore, employees do not have to pay for separate training before getting a paycheck and can experience the rigors and learning curve of the work in a measured way as they come up to speed in the sector.

- **Marketing to all possible types of prospective workers:** GTA recognizes that its ability to build great networks will be improved with the inclusion of people from all parts of society—including people without significant past representation in the telecom sector. Trade schools, technical colleges, and community colleges have significant experience with outreach to nontraditional students, women, and minorities—and their participation in growing a robust, qualified telecom sector workforce is essential.

- **Local hiring:** Hiring local workers benefits telecom construction in several ways: It saves money by reducing the travel time and travel expenses (e.g., accommodations) required of laborers; it allows for better recruitment as employees often prefer to stay near their

home; and it ensures the benefits of hiring in labor surplus areas stay in that community. GTA encourages local hiring to be prioritized.

- **Explicit pathways to advancement:** Once a new hire takes the first step into a telecommunications career, their ability to stick with that career and grow in the sector requires well-established pathways to advancement. Establishing great growth pathways can both incentivize people to start in the sector, and ensure they stay to build on their skills and knowledge.

- **Coordination between training providers and employers:** Ongoing close coordination between training providers and employers is essential to ensure that training providers understand what credentials are meaningful, adapt programs to stay current with the sector's needs, and collectively evaluate programs' success and iterate as needed.

- **Recruitment strategies tailored to the realities and challenges of the industry:** Enticing people into a new sector and new career—especially one as unique as being a telecommunication worker—is difficult, especially when unemployment rates are low. Successful recruitment strategies involve screening for aptitude and ability to learn, marketing opportunities based on the tangible and intangible benefits of the career, and making sure there are diverse demographics represented in marketing materials. However, due to the challenges of the job that can only be understood fully by experience, there will always be significant numbers of people who quit within a few months of employment as a lineworker or installer. Because of this, it is recommended that programs and employers set recruitment targets at double or even triple the number of people needed.

In alignment with NTIA Guidance 2.8.1 part d., ensuring job availability to a diverse worker pool, GTA will ensure job opportunities created by the BEAD program are available to a diverse pool of workers, including the strategies described in Section 10, below.

The State encourages successful training and recruitment programs—such as the programs at public institutions of higher education, Southeast Lineman Training Center, the Adtell Fiber School, and others—to be expanded and continued. And given that stakeholders reported that many trainees come from out of state to take advantage of the training opportunities in Georgia, the State supports working to entice those out of state trainees to stay by providing strong pathways from training programs to Georgia employers.

ISPs and broadband builders also noted that convincing young trainees and recruits to work building broadband in rural areas was a particular challenge. Younger employees sometimes had more desire to live in urban areas, so given that rural areas are where new infrastructure needs to be built, this is a salient concern. As such, the State endorses the strategy of focusing recruitment training across the state, so that people who come from rural areas and want to live in those places can be trained and ultimately support broadband construction in their own community.

GTA was encouraged by the potential of a program to ensure the use of a highly trained, safe and effective workforce. Stakeholders consulted were receptive to the possibility of an additional state-funded program to teach basic technical skills. Stakeholders noted that with a fundamental technical education, particular ISPs and broadband builders could then more efficiently finish the training of these individuals in their particular systems. The State will further consider this approach with its institutions of higher education and training partners.

In alignment with NTIA Guidance 2.8.1 part b., GTA will continue to promote sector-based partnerships among the range of entities consulted and convened for this Proposal. GTA will actively and routinely share findings and opportunities from this ongoing coordination efforts to ensure alignment across sector-based partners. GTA will require that the workforce be appropriately skilled and credentialed as described in Sections 5.12.6 and 9.4 (NTIA Guidance 2.4.13 and 2.8.2).

Lastly, perhaps the most important workforce role for Georgia is its commitment to ongoing and close coordination with employers and training programs in the broadband sector. Ultimately, the state's workforce initiatives will be most successful if they are responsive to industry needs.

9.4 Subgrantee selection process related to workforce considerations

GTA will request the following information from applicants, including information about contractors and subcontractors, in alignment with NTIA Guidance Section 2.7.1 to ensure compliance with labor laws:

- Prospective subgrantees' record of past compliance with federal labor and employment laws, which:
    - Must address information on these entities' compliance with federal labor and employment laws on broadband deployment projects in the last three years;
    - Should include a certification from an Officer/Director-level employee (or equivalent) of the prospective subgrantee evidencing consistent past compliance with federal labor and employment laws by the subgrantee, as well as all contractors and subcontractors; and

- Should include written confirmation that the prospective subgrantee discloses any instances in which it or its contractors or subcontractors have been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.
- Prospective subgrantees' plans for ensuring compliance with federal labor and employment laws, which must address the following:
    - How the prospective subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:
        - Information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network; and
        - How the subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

In addition, in accordance with NTIA Guidance 2.8.2, this section details the information that will be required of prospective subgrantees to demonstrate a plan for ensuring that the project workforce will be appropriately skilled and credentialed. GTA will require subgrantees to:

- Demonstrate how they will ensure an appropriately skilled workforce, e.g., through Registered Apprenticeships, existing training, or other joint labor-management training programs that serve all workers.
- Demonstrate that all members of the project workforce will have appropriate credentials, e.g., appropriate, and relevant pre-existing occupational training, certification, and licensure.

Should the workforce of subgrantee, contractor or subcontractor not be unionized, GTA will require the subgrantee to provide the following with respect to the non-union workforce:

- The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce
- For each job title required to carry out the proposed work (including contractors and subcontractors), a description of:
    - Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title

and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles

Information on the professional certifications and/or in-house training in place to ensure deployment activities meet a high standard. In alignment with NTIA Guidance 2.8.2, GTA will require subgrantees to certify that they have the processes and resources in place to employ an appropriately skilled and credentialed workforce and that key technical personnel and technical team members are current on all required training, licensing, and license renewals, as noted above in Section 5.12.6.1, Officer Certifications (NTIA Guidance 2.4.13). GTA will provide a list of required licenses and certifications as part of its Application Guide and Program Guide posted on its website and discussed during the workshop.

10 Minority Business Enterprises (MBE) / Women's Business Enterprises (WBE) / labor surplus area firms' inclusion (Requirement 13)

This section documents how the Georgia Technology Authority (GTA) will promote recruiting, utilizing, and retaining minority business enterprises (MBE), women's business enterprises (WBE), and labor surplus area firms (LSAF), when possible, pursuant to 2 C.F.R. 200.321.

Georgia has a framework for certifying and connecting MBEs and WBEs with opportunities. MBE certification in Georgia indicates a business is at least 51 percent owned and operated by one or more minorities, and similarly, WBE certification requires a woman or women to have majority ownership and control of the business entity.[17] The State of Georgia also recognizes labor surplus area firms pursuant to the Department of Labor definition.[18] Under the stewardship of GTA, recognized LSAFs are solicited, used, and retained when possible.

The State of Georgia, through its Department of Economic Development,[19] in partnership with the Georgia Department of Administrative Services (DOAS)[20] and the Georgia Department of Transportation (GDOT),[21] offers certification processes for MBEs and WBEs, facilitating real-time business opportunities.[22] Georgia maintains a list of MBEs/WBEs for solicitation and has already certified over 3,360 MBE/WBE organizations.[23] Certified MBEs/WBEs in Georgia can leverage this certification to grow their business, tap into a network of potential partners, and access state contracting and subcontracting opportunities.

10.1 Process, strategy, and data tracking methods to ensure that minority businesses, women-owned business enterprises, and labor surplus area firms are recruited, used, and retained when possible

GTA is committed to promoting diversity and inclusion by encouraging the recruitment, utilization, and retention of MBEs, WBEs, and LSAFs whenever possible. Through DOAS and

[17] "WBE and MBE Certifications in Georgia," Georgia Department of Economic Development, https://www.georgia.org/small-business/mean-wbe-mbe-certified.
[18] "Frequently Asked Questions – What is a Labor Surplus Area?" U.S. Department of Labor, https://www.dol.gov/agencies/eta/lsa/faq.
[19] Georgia Department of Economic Development, https://www.georgia.org.
[20] Georgia Department of Administrative Services, https://doas.ga.gov/.
[21] "Disadvantaged Business Enterprise (DBE), Georgia Department of Transportation, https://www.dot.ga.gov/GDOT/Pages/DBE.aspx.
[22] "Minority Business Enterprise Certification," Georgia Department of Administrative Services, https://doas.ga.gov/state-purchasing/minority-business-enterprise-certification.
[23] "MBE Certified Organizations Listing," Georgia Department of Administrative Services, report date February 2, 2022, https://doas.ga.gov/sites/default/files/assets/State%20Purchasing/Minority%20Business%20Enterprise%20Certification/MBE%20Organizations%20All.xlsx.

GDOT, Georgia maintains a current list of MBE/WBE and LSAF organizations.[24] GTA will work with DOAS and GDOT to track, as appropriate, subgrantees' use of MBEs, WBEs, and LSAFs.

10.1.1 Place qualified small and minority businesses and women's business enterprises on solicitation lists

GTA's efforts will encompass placing qualified small, minority, and women's business enterprises on solicitation lists for GTA-funded solicitations, ensuring they are solicited whenever they are potential sources. Additionally, GTA will work in conjunction with DOAS and GDOT to deliver regional MBE/WBE business development events and outreach, including training sessions, webinars, mentorship opportunities, and programs aimed at connecting MBEs/WBEs with Georgia state agencies, authorities, and local contracting opportunities.

10.1.2 Assure that small and minority businesses and women's business enterprises are solicited whenever they are potential sources

GTA, DOAS, and GDOT will work closely with subgrantees to maximize the utilization of qualified MBEs, WBEs, and labor surplus area firms by providing training and opportunities to connect with these certified enterprises. In cooperation with the Georgia Minority Supplier Development Council (GMSDC),[25] GTA will ensure information about grant and contracting opportunities are made available to small and minority businesses and women's business enterprises wherever they are potential sources.

GMSDC's primary functions are (1) to certify minority ownership of qualifying business entities; (2) to develop the readiness of certified MBEs and position them for growth through training and educational programs; (3) to connect essential relationships between Georgia corporations and MBE firms; and (4) to advocate for MBE/WBE entities in policy and the community.[26]

10.1.3 Divide total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises

By dividing total requirements into smaller tasks or quantities and establishing delivery schedules conducive to participation by small and minority businesses and women's business enterprises, GTA aims to promote a more inclusive economic environment in Georgia. Through these efforts,

[24] "MBE Certified Organizations Listing," Georgia Department of Administrative Services, report date February 2, 2022, https://doas.ga.gov/sites/default/files/assets/State%20Purchasing/Minority%20Business%20Enterprise%20Certification/MBE%20Organizations%20All.xlsx.
[25] "Get Certified," Georgia Minority Supplier Development Council, https://gmsdc.org/get-certified/.
[26] Georgia Minority Supplier Development Council, https://gmsdc.org.

GTA will maximize participation by small and state-certified minority owned as well as women's business enterprises.

10.1.4 Establish delivery schedules, where the requirements permit, which encourage participation by small and minority businesses and women's business enterprises

Where requirements permit, GTA will encourage participation by small and minority businesses and women's business enterprises. GTA will also seek to be flexible with its requirements to enable greater MBE/WBE engagement.

10.1.5 Use the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce

Through partnerships with organizations such as the Small Business Administration and the Minority Business Development Agency, GTA will facilitate the provision of necessary resources and support to these enterprises, thus fostering a thriving and diverse business community in Georgia.

The State of Georgia currently operates five minority business development programs recognized by the Minority Business Development Agency of the Department of Commerce and the Division of Small Business:

- Georgia MBDA Business Center[27]
- Georgia Tech Research Corporation[28]
- Operation Hope[29]
- Savannah State University[30]
- Atlanta Small Business Administration District Office[31]

[27] "Georgia MBDA Business Center," Minority Business Development Agency, https://www.mbda.gov/business-center/georgia-mbda-business-center.
[28] "Georgia Tech Research Corporation," Minority Business Development Agency, https://www.mbda.gov/business-center/grant-recipient-georgia-tech-research-corporation.
[29] "Operations Hope," [sic] Minority Business Development Agency, https://www.mbda.gov/business-center/grant-recipient-operations-hope.
[30] "Savannah State University," Minority Business Development Agency, https://www.mbda.gov/business-center/grant-recipient-savannah-state-university.
[31] Georgia, U.S. Small Business Administration, https://www.sba.gov/district/georgia.

10.1.6 Require each subgrantee to take these affirmative steps as they relate to its subcontractors

GTA will work with subgrantees to ensure that they take steps to include qualified MBE/WBEs and labor surplus area firms whenever possible. This concerted effort will not only contribute to the economic growth of Georgia but also build a more equitable and inclusive business landscape in the state. GTA may take steps that include, but are not limited to:

- Providing subgrantees with training and opportunities to connect with qualified MBEs, WBEs, and LSAFs
- Demonstrating diversity in in suppliers and equitable procurement practices
- Formal commitment from subgrantee confirming organizational commitment to supplier diversity and equity inclusion
- Reporting requirements regarding supplier diversity

10.2 Certification

The State of Georgia hereby certifies that it will take all necessary affirmative steps to ensure minority businesses, women's business enterprises, and labor surplus area firms are used when possible, including the following outlined on pages 88-89 of the BEAD NOFO:

☑ Placing qualified small and minority businesses and women's business enterprises on solicitation lists.

☑ Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources.

☑ Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises.

☑ Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises.

☑ Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.

☑ Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

11 Cost and barrier reduction (Requirement 14)

This section documents the steps GTA will take to reduce costs and barriers to deployment through promoting the use of existing infrastructure and promoting dig-once policies, streamlined permitting processes, and cost-effective access to poles, conduits, easements, and rights-of-way, including the imposition of reasonable access requirements. This section also includes steps to reduce costs associated with construction, labor, overhead, and materials which GTA has identified as additional barriers.

Georgia has taken proactive steps to reduce barriers to deployment, including implementing a simplified fee structure for communications providers utilizing state rights-of-way to locate physical plant (see Section 11.1.1) and establishing permitting best practices at the local and County level through a Model Ordinance (see Section 11.3.1.1).

Through an extensive review of sources of increased deployment costs of and barriers to deployment, GTA has identified the following strategies for mitigating cost and barrier risks.

11.1 Promote the use of existing infrastructure

11.1.1 Streamline access to State conduits and poles

The State of Georgia has taken several steps to facilitate access to rights-of-way and utility poles for the purposes of broadband expansion.

In 2022, the Georgia Department of Transportation (GDOT) improved the fee structure for wireline and wireless carriers to utilize the State's roadway rights-of-way for locating physical plant,[32] as GDOT's previous 30-year-old fee structure did not reflect the evolution of the telecommunications industry. The revision also simplifies and reduces costs to utility and telecommunications providers in rural areas.

Rather than assessing fees based on distance, GDOT now charges a one-time application fee ($742 for last-mile installations of a length less than one mile, and $1,400 for installations greater than one mile) in addition to a flat recurring annual fee ($300 for all installations).[33] All providers pay the same fee[34] and fees are waived for Georgia's non-profit electric membership cooperatives (EMC), which operate the largest electric distribution network in the state, for

[32] "Chapter 672-11 Installation, Relocation, and Management of Utilities on Public Rights-of-Way," Rules and Regulations of the State of Georgia, https://rules.sos.ga.gov/gac/672-11.
[33] "Georgia Broadband Annual Report 2022," GTA and DCA, https://gta.georgia.gov/document/document/2022-broadband-annual-report/download.
[34] "Valuation and Compensation Approaches in Utility Accommodation: A Guide, Appendices A-E," National Cooperative Highway Research Program, https://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_1053Appendices.pdf, p. 43.

permits that are only for providing broadband service.[35,36] This updated fee structure is intended to encourage broadband deployment with lower upfront and ongoing permitting expenses.

GDOT has also begun an evaluation of a long-term policy plan for strategic use of the state's roadway rights-of-way, particularly limited-access facilities such as interstate highways, as outlined in Georgia's Achieving Connectivity Everywhere (ACE) Act (2018). As GDOT develops an investment plan for broadband deployment for transportation purposes, it will coordinate with GTA to identify opportunities to advance rural broadband buildout at a lower cost, particularly to support cost reductions for deployment of ARPA funds allocated to last-mile rural broadband projects.

To further help broadband providers plan for infrastructure buildouts, the Public Service Commission (PSC) has standardized the rates and rules associated with pole attachments agreements between EMCs and telecommunications service providers at the direction of House Bill 244 (2020).[37]

Effective July 1, 2021, PSC implemented the following fee structure: EMCs are now required to charge a simple $1-per-year fee for entities to attach utility service to poles in areas unserved by broadband (as determined by the Georgia Broadband Map published by DCA). The $1 fee would be set for six years. Pole rates in areas currently served by broadband were set at $27.71 per pole per year. According to the PSC, this rate represents an at-cost fee to cover service and upkeep of the poles.

11.1.2 Encourage local communities to leverage their poles and conduits

GTA will encourage municipalities that own poles or conduits to make them available and will provide examples of local ordinances or policies as models. These localities can indicate availability of such streamlined access and GTA will publish this information for eligible areas so grant participants can take it into consideration for their cost proposals.

GTA anticipates providing technical assistance to help local communities navigate issues related to right-of-way and pole access for broadband deployment and can potentially convene partners to resolve questions or differences.

[35] "Georgia's EMCs," Georgia Electric Membership Corporation, https://georgiaemc.com/page/GeorgiasEMCs.
[36] Senate Bill 2 (2019) authorized EMCs in the State to provide broadband services and/or enter partnerships to do so; see, https://www.legis.ga.gov/api/legislation/document/20192020/187618.
[37] These charges have historically been unregulated except in the case of Georgia Power, whose pole rates are regulated by the FCC.

11.1.3 Allow access to limited-access rights-of-way for last-mile broadband providers providing service to unserved locations

As discussed above, GDOT is evaluating policies for strategic use of limited-access facilities such as interstate highways to support cost reductions for last-mile rural broadband projects supported by ARPA funds.

GTA will work with GDOT to explore ways it can facilitate subgrantees gaining access to limited-access rights-of-way through streamlined public interest and resource-sharing arrangements. If delivering broadband to unserved locations is defined as public interest construction, it could potentially facilitate resource-sharing arrangements that could be standardized to reduce permit timelines and costs.

11.2 Promote dig-once policies by providing best practice guide for localities

GTA will encourage sharing of open trenches and available conduit via the promotion of dig-once policies, which ensure proper notification has been made before rights-of-way are open with the goal of facilitating collaborative (and concurrent) construction timelines between entities hoping to dig in the same rights-of-way.

According to a GDOT representative, "GDOT has a dig once philosophy but not a policy."[38] As an incentive, GDOT reduces permitting fees (outlined in Section 11.1.1) by 25 percent for simultaneous installations of cable by two or more providers in the same trench or on a pole line in joint use.[39]

GTA will encourage sharing of open trenches and available conduit via the promotion of dig-once policies, which ensure proper notification has been made before rights-of-way are open with the goal of facilitating collaborative (and concurrent) construction timelines between entities hoping to dig in the same rights-of-way.

The state will publish best practices and guides for localities to consider implementing similar policies and model local codes. This will minimize the number of times rights-of-way will be dug into, allowing even the smallest funded projects to leverage economies of scale to reduce costs.

This approach is in alignment with guidance from the U.S. Federal Highway Administration (FHWA) Office of Transportation Policy Studies, which notes in a policy brief that "the largest cost

[38] "Valuation and Compensation Approaches in Utility Accommodation: A Guide, Appendices A-E," National Cooperative Highway Research Program, https://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_1053Appendices.pdf, p. 45.
[39] See, GA R672-11-.03; "Valuation and Compensation Approaches in Utility Accommodation: A Guide, Appendices A-E," National Cooperative Highway Research Program, https://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_1053Appendices.pdf, p. 43.

element for deploying broadband is burying fiber optic cables and conduit underground," citing the FCC. In the brief, FHWA emphasizes the importance of implementing dig once policies at the local level as permits to install or work on existing facilities are often requested from cities and counties.[40]

11.3 Streamline permitting processes

11.3.1 Optimize local permitting processes

The state will leverage its organizational and coordinating power to streamline permitting processes for the many anticipated awardees that will deploy network infrastructure on or in assets owned by counties and localities.

11.3.1.1 Promote use of Model Ordinance to establish best practices for county and local permitting

The increased volume of permit applications caused by historic investment in broadband deployment may pose a particular challenge for small local governments in the state. To that end, the Georgia Department of Community Affairs (DCA) drafted a Model Ordinance[41] for use by local governments to streamline permitting by creating a single point of contact for permits, creating a standard timeline for the review of permits, and standardizing and limiting the fees charged for permits, among other measures.

By adopting the Model Ordinance[42] and amending their comprehensive plans to include the promotion of the deployment of broadband services, cities and counties can earn a Broadband Ready Community certification from DCA. The designation indicates that communities have taken proactive steps to attract investment by providers.

56 communities had received the designation as of June 2023, and many communities that had not yet earned the designation stated that they would like to do so; DCA is providing direct outreach to assist communities seeking certification.

[40] "Minimizing Excavation Through Coordination," policy brief from the FHWA Office of Transportation Policy Studies, October 2013, https://www.fhwa.dot.gov/policy/otps/policy_brief_dig_once.pdf.
[41] DCA, "An ordinance for a broadband ready community," https://broadband.georgia.gov/media/4/download. See also, DCA, "Georgia Broadband Program: General Information," https://broadband.georgia.gov/general-information ("The purpose of the model ordinance is to signal a local unit of government has taken steps to reduce obstacles to broadband infrastructure investment. The broadband model ordinance has been developed through collaboration with representatives of local governments and providers").
[42] Available at https://gta.georgia.gov/broadband/support-local-governments; if DCA receives an application inclusive of an adopted ordinance that does not follow the model ordinance, the application will be made available for a public comment period of at least 30 days after such an application is received.

11.3.1.2 Facilitate collaboration with key Department of Transportation and environmental and historic preservation agencies

GTA will also incorporate best practices for consultation with environmental and historic preservation agencies into its educational outreach to counties and localities. These agencies will receive permit requests and material within a condensed period of time. GTA may create standardized templates to simplify the materials required for environmental assessments and allow the same materials to be provided to different agencies where feasible. While GTA will include federal agencies in its discussions, it highly encourages NTIA as the primary federal agency in charge of BEAD funds to enter into programmatic agreements with such agencies.

11.3.2 Streamline State permitting processes by developing fast-track permit and pre-approved construction methods

To facilitate awarded projects that need to cross State-protected lands, the State will discuss streamlining permitting processes with relevant land-controlling agencies. These efforts will include developing fast-track permitting policies for construction methods that are known to have low impacts on the surrounding rights-of-way. Additionally, the State will identify and publish easement corridors and construction methods likely to receive rapid reviews for applicable protected lands so that potential projects that need to cross land without available roads or rights-of-way may plan their construction to be minimally invasive and maximally cost effective.

11.3.3 Shrink federal permitting timelines by partnering with NTIA to discuss a streamlined "shot clock" permit process

To benefit potential awardees that intend to cross federal lands, the state will attempt to shrink permitting timelines for access to federal lands by partnering with NTIA to discuss process reforms that might be implemented with key federal land-controlling agencies and exceptions that might be granted to BEAD awardees. As the lead federal agency, NTIA can also develop programmatic agreements with agencies to facilitate such permitting. One approach could include a "shot clock" permitting process on certain federal land use permits that would incentivize federal agencies to process BEAD permitting applications within a predetermined, finite, and reasonable amount of time.

11.4 Reduce construction costs

11.4.1 Encourage specialized equipment sharing

Smaller ISPs in particular may struggle with the high cost and access to specialized equipment needed to drill into hard rock when installing underground fiber. GTA will encourage providers to enter into resource-sharing agreements as a way to reduce costs and risks.

11.5 Reduce drop costs

Drop costs, especially in rural areas where houses are often set back far from the public road, can be very high. Since applicants are required to absorb such costs to connect subscribers under BEAD terms, they will factor these costs into cost proposals. Prospects for lowering such costs could lead to lower BEAD outlay requests and therefore more unserved and underserved locations that can be connected with Priority Broadband Projects.

11.5.1 Map pole site locations and overlashing possibilities

GTA will consult with pole owners to determine if they are amenable to making pole locations publicly available for design and cost estimation purposes. If pole owners agree in certain areas, GTA will offer to disseminate this information to applicants.

The state will convene with incumbent local exchange carriers (ILEC) and competitive local exchange carriers (CLEC) to assess the feasibility of using existing copper telephone wires on utility poles to overlash drop fiber cables. The state will also convene with electric utilities to assess the feasibility of using existing messenger wires that support low-voltage power to lash drop fiber cables.

11.6 Reduce labor costs

11.6.1 Strike a balance between skilled and certified labor requirements and the cost of labor

Extending Priority Broadband to the maximum number of unserved and underserved residents and business requires lowering barriers to entry and the cost of construction, which includes labor costs. At the same time, the state is committed to fair labor standards and wages that reflect the skills and certifications of workers.

Accordingly, the state will require certifications appropriate to specific risks and roles, rather than overly broad professional requirements that would require specialized labor for low-skill tasks. GTA will apply standards consistent with previous broadband initiatives and best practices provided by industry organizations.

In addition, when engineering documentation requiring a Professional Engineer (PE) certification is a condition of grant participation, GTA will accept PE certifications from other states in the region.

11.6.2 Increase supply of labor through workforce development initiatives

GTA's workforce development plan is outlined in Section 9.

11.7 Reduce overhead costs

11.7.1 Adopt reasonable, compliance-focused regulatory and reporting requirements

The state will attempt to reduce the overhead costs of construction and network operation by striking an appropriate balance in its regulatory and reporting policies. The state will keep the interval of required reporting reasonable, publish clear and concise reporting workflows so awardees can focus resources and efforts on construction, and leverage existing reporting templates for state grants, RDOF, or ReConnect where appropriate.

11.7.2 Create fast-track screening for environmental compliance

The state will develop fast-track screening for environmental safety evaluations with NTIA guidance to simplify and help awardees navigate the environmental and historic preservation review process.

11.7.3 Create an ISP and agency technical assistance committee

GTA will create a technical assistance committee consisting of ISP and agency representatives to share expertise and information regarding compliance reporting with awardees.

11.8 Reduce the initial capital cost burden on smaller ISPs

11.8.1 Provide "letter of information" to in-state community banks and credit unions to facilitate letters of credit and performance bonds

The letter of credit or performance bonding requirement under BEAD can be a barrier to participation for smaller ISPs in particular. To assist banks unfamiliar with the risk environment for fiber deployments, GTA will develop a letter of information and offer assistance including:

- Listing requirements and best practices for risk management to ensure ISPs can apply in accordance with scale.
- Providing a primer on approaches to calculate operational costs and estimate the value of collateral assets to allow smaller ISPs and banks to understand how high the credit and maximum total application amount should be.
- Connect local and community banks with service areas overlapping eligible locations to local grant participants.

GTA will reach out to credit unions and community banks with unserved locations in their service areas and make a list of such banks available to ISPs. In addition, it will discuss partnership models and options for banks to work with community development organizations and private partners to underwrite loan guarantees for local banks to provide letters of credit or performance bonds.

12 Climate assessment (Requirement 15)

This section accounts for and provides an assessment of current and future weather and climate-related risks to new broadband infrastructure in Georgia. Georgia's unique geographical location exposes the state and its citizens to severe weather at any time of the year. Georgia is one the few places where regional weather conditions may include snow and ice accumulations accompanied by lighting and tornadoes from the same storm event. Georgia has averaged a federal disaster declaration about once every year for the last fifteen years.[43]

The requirements and procedures for state and local mitigation plans are found in the Code of Federal Regulations (CFR) at Title 44, Chapter 1, Part 201.[44] Georgia's Hazard Mitigation Strategy (GHMS) is a result of the State of Georgia's continued efforts to reduce the state's exposure to losses from natural hazards and to maintain eligibility for the full range of disaster assistance available under the Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended by the Disaster Mitigation Act of 2000 (DMA2K). Georgia has published a Hazard Mitigation Strategy every four years since 2005.

In the GHMS, the State has worked to identify the hazards most likely to impact Georgia residents and has aggregated data from numerous sources to identify areas of the state that are most at risk of impact from each hazard identified. The most recent iteration of the GHMS, published by the Georgia Emergency Management and Homeland Security Agency (GEMA/HS), was authored in 2019 and is due to be updated in 2024.[45]

The Enhanced State Mitigation Plan documents the State's commitment to the objectives of hazard mitigation. This designation recognizes Georgia as a proactive leader in implementing a comprehensive statewide program. The enhanced status acknowledges the extra effort a state has made to reduce losses, protect its resources, and create safer communities. The Enhanced status makes Georgia eligible to receive a 33 percent increase in Hazard Mitigation Grant Program funds in the aftermath of a presidentially declared disaster. Strong state and local mitigation planning processes and comprehensive mitigation program management at the state level are important elements in reducing vulnerability to future disaster losses.

[43] "Hazard Mitigation Planning," Georgia Emergency Management and Homeland Security Agency (GEMA/HS), https://gema.georgia.gov/hazard-mitigation-planning.
[44] "Title 44, Chapter 1, Part 201," eCFR, National Archives and Records Administration, https://www.ecfr.gov/current/title-44/chapter-I/subchapter-D/part-201/.
[45] "Georgia Hazard Mitigation Strategy Standard and Enhanced Plan, effective March 18, 2019 – March 17, 2024," GEMA/HS, https://gema.georgia.gov/document/publication/2019-georgia-hazard-mitigation-strategypdf/download.

The 2018 GHMS identified the following 15 Georgia planning efforts as aligned with the GHMS and incorporated them into the plan: Georgia StormReady,[46] GA Planning Act,[47] Safe Dams,[48] Coastal Management,[49] Coastal Marshland Protection,[50] Erosion and Sedimentation Control,[51] River Corridor Protection, Shore Protection, Emergency Watershed Protection, EMAP Accreditation,[52] Southern Wildfire Risk Assessment,[53] Community Wildfire Protection Plans,[54] Silver Jackets,[55] Risk MAP, and the CRD Sea Level Rise Study. Additionally, mitigation programs operated by the Federal Emergency Management Agency (FEMA) were incorporated into the GHMS.

GEMA/HS works with local, state, and federal governments, in partnership with the private sector and faith-based community, to prevent and respond to natural and man-made emergencies. In addition, GEMA/HS employees are on 24-hour call statewide to assist local authorities when disaster strikes.

The 2019 GHMS contains 13 natural hazards. The plan retains the 12 natural hazards profiled in the 2014 GHMS and adds Extreme Heat as a hazard. Two of the hazards, Seismic Hazards and Geologic Hazards, were deemed low priority and are not relevant to the Initial Proposal climate assessment.

[46] "StormReady in Georgia," National Weather Service, https://www.weather.gov/ffc/sready.
[47] See, "Governing Statutes, Regulations, and Guidance," GCA, https://www.dca.ga.gov/local-government-assistance/planning/governing-statutes-regulations-guidance.
[48] "Safe Dams Program," Environmental Protection Division, https://epd.georgia.gov/watershed-protection-branch/safe-dams-program.
[49] "Georgia Coastal Management Program," Georgia Department of Natural Resources, https://coastalgadnr.org/CoastalManagement.
[50] See, "Jurisdictional Determinations for Marsh and Shore Activities," Georgia Department of Natural Resources, https://gadnr.org/JurisdictionalDeterminationsCRD.
[51] "Urban Erosion & Sediment Control," Georgia Soil and Water Conservation Commission, https://gaswcc.georgia.gov/urban-erosion-sediment-control.
[52] "Who is Accredited?" EMAP, https://emap.org/who-is-accredited/.
[53] "Overview," Southern Group of State Foresters Wildfire Risk Assessment Portal, https://southernwildfirerisk.com/About.
[54] See, "Advance planning for wildfire dangers can spare time, property and lives," Georgia Forestry Commission, https://gatrees.org/fire-prevention-suppression/community-wildfire-protection-plan/, stating, "GFC helps communities prepare for wildfire potential by creating a Community Wildfire Protection Plan (CWPP). We work with officials and citizens to identify risks that might slow an emergency response if there is a danger from wildfires. A CWPP provides a community with a road map to reduce wildfire risks."
[55] "Georgia Silver Jackets," U.S. Army Corps of Engineers, https://www.iwr.usace.army.mil/Silver-Jackets/State-Teams/Georgia/.

Five hazards were deemed high priority: Tornadoes, inland flooding, hurricane winds, severe weather (encompassing hail and lightning), and coastal hazards. Six hazards were deemed medium priority: Drought, severe winter weather, wildfire, wind, extreme heat, and dam failure.

12.1 Identifying geographic areas subject to initial hazard screening

The GHMS will be the main source for evaluating and locating high risk areas, while the 159 county hazard mitigation plans identified in the GHMS may provide additional data.

This analysis will also use the work conducted by FEMA's National Risk Index (NRI) team to identify the hazards likely to impact residents of Georgia. It will employ the FEMA classification the classification scheme of the Federal Emergency Management Agency (FEMA), assessing each county's risks relative to other counties around the nation, and ranking county's risks as Very Low (0-20th percentile), Relatively Low (20th-40th percentile), Relatively Moderate (40th-60th percentile), Relatively High (60th-80th percentile), or Very High (60th-80th percentile).

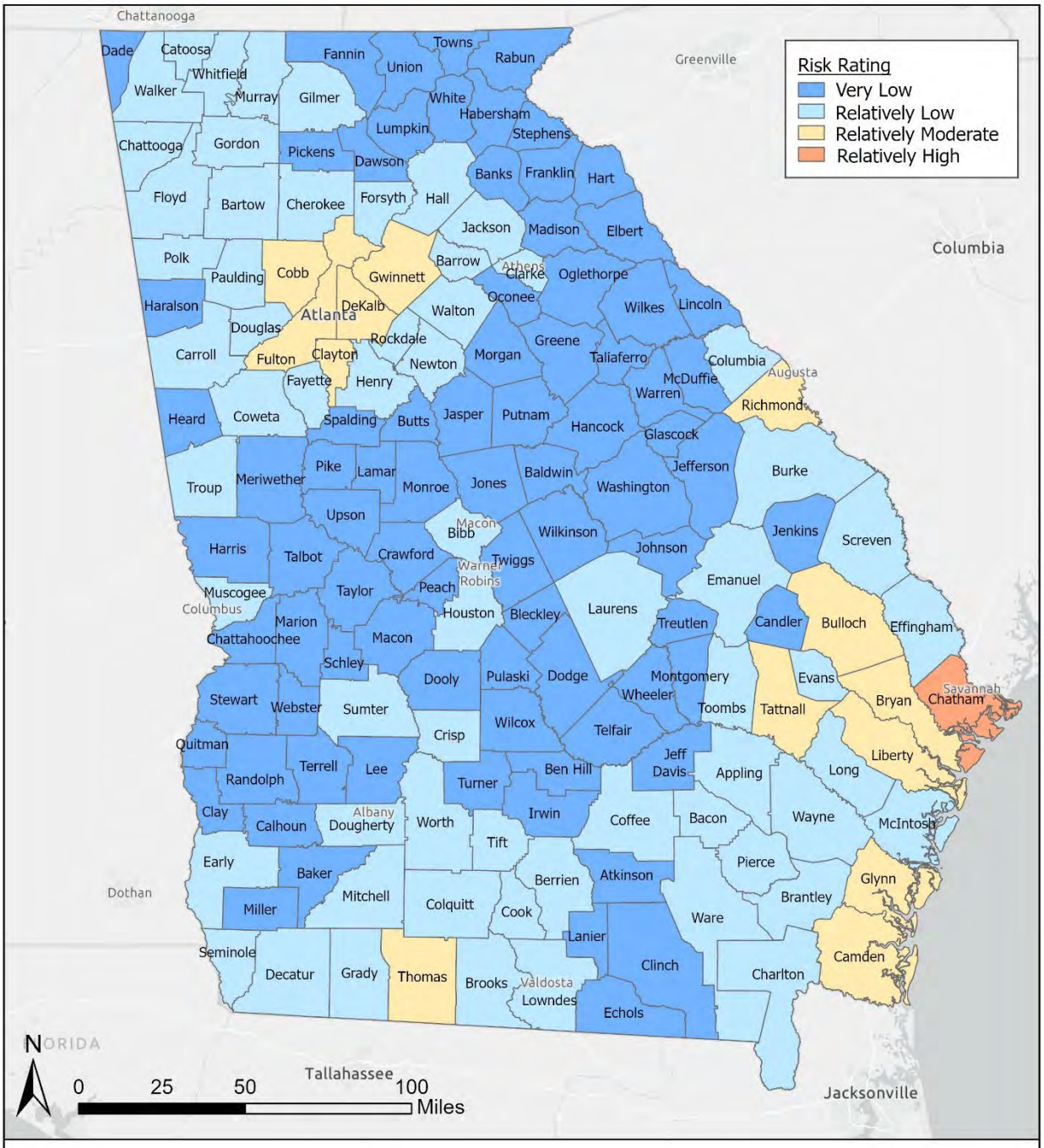
In addition to statewide planning, many permitting requirements and construction standards will govern the construction of BEAD-funded networks. These requirements will be subject to local ordinances. The State has taken steps to ensure local policy makers are taking the latest climate projection data into account as they set their standards and requirements. To this end, the State has prepared numerous resources to support local policy makers to help increase the resilience and adaptability of their jurisdictions, including publishing helpful documents and resources for localities to prepare their own community sustainability plans and climate change vulnerability assessment and action plans.

According to FEMA's overall risk index, only one of Georgia's 159 counties, coastal Chatham, is identified as being at Relatively High risk from natural disaster and weather hazards, and none are identified as being at Very High risk. Several counties—including those in the Atlanta area—are at Relatively Moderate risk overall. GTA recommends the counties categorized as Relatively High or Relatively Moderate overall risk for the initial hazard screening: Bryan, Bulloch, Camden, Chatham, Clayton, Cobb, DeKalb, Fulton, Glynn, Gwinnett, Liberty, Richmond, Tattnall, and Thomas counties. The screenings should be done on a time scale consistent with the Georgia Hazard Mitigation Strategy to align data collection and analysis efforts: an initial hazard screening beginning in 2024, and a full re-screening every five years.

This overall risk categorization accounts for the specific hazards described below; the Relatively Moderate counties are categorized as such because they have higher risks to monitor for certain hazards. For example, the counties in the Atlanta area that are at Relatively Moderate risk are given that overall categorization because they face Very High risk for flooding and tornadoes, and coastal counties face Very High risk for hurricanes and coastal hazards. By including counties with

an overall FEMA risk index of Relatively Moderate and Relatively High in the initial hazard screening, the state will ensure thorough screening of counties with high overall risk and with high risk for specific hazards.

Figure 3: Composite FEMA hazard risk scores in Georgia



12.2 Characterizing which weather and climate hazards may be most important to account for and respond to these in areas and over time horizon

The GHMS ranks the following hazards in two overall risk priorities, high priority and medium priority:

Table 13: Risk ranking of Georgia hazards

Hazard	Ranking	Priority	Over time horizon
Tornado	1	High	Future projections inconclusive
Inland flooding	2	High	Likely to increase over time horizon
Hurricane wind	3	High	Likely to increase over time horizon
Severe weather[56]	4	High	Likely to increase over time horizon
Coastal hazards	5	High	Likely to increase over time horizon
Drought	6	Medium	Future projections inconclusive
Severe winter weather	7	Medium	May decrease over time horizon
Wildfire	8	Medium	May increase over time horizon
Wind	9	Medium	Likely to increase over time horizon
Extreme heat	10	Medium	Likely to increase over time horizon
Dam failure[57]	11	Medium	May increase over time horizon

The GHMS also assessed the social vulnerability of each of Georgia's 159 counties. Out of five risk categories, 11 counties were Extremely High risk (the highest social vulnerability risk category) and 67 counties were High risk (the second highest social vulnerability risk category).

To identify where hazards were responsible for driving the composite riskiness of the areas identified above, the State analyzed the estimated annual losses to buildings[58] for individual

[56] Severe weather includes both lightning and hail.
[57] Dam failure is covered below in the section on Inland flooding.
[58] "Expected Annual Loss," Federal Emergency Management Agency, https://hazards.fema.gov/nri/expected-annual-loss.

hazards across the state in order to understand the risk to BEAD assets associated with individual hazards. The following contextualizing narratives are adapted from the GHMS and appear in the order presented in the GHMS, Section 2.5, "Hazard-specific assessments."

12.2.1 Hurricane

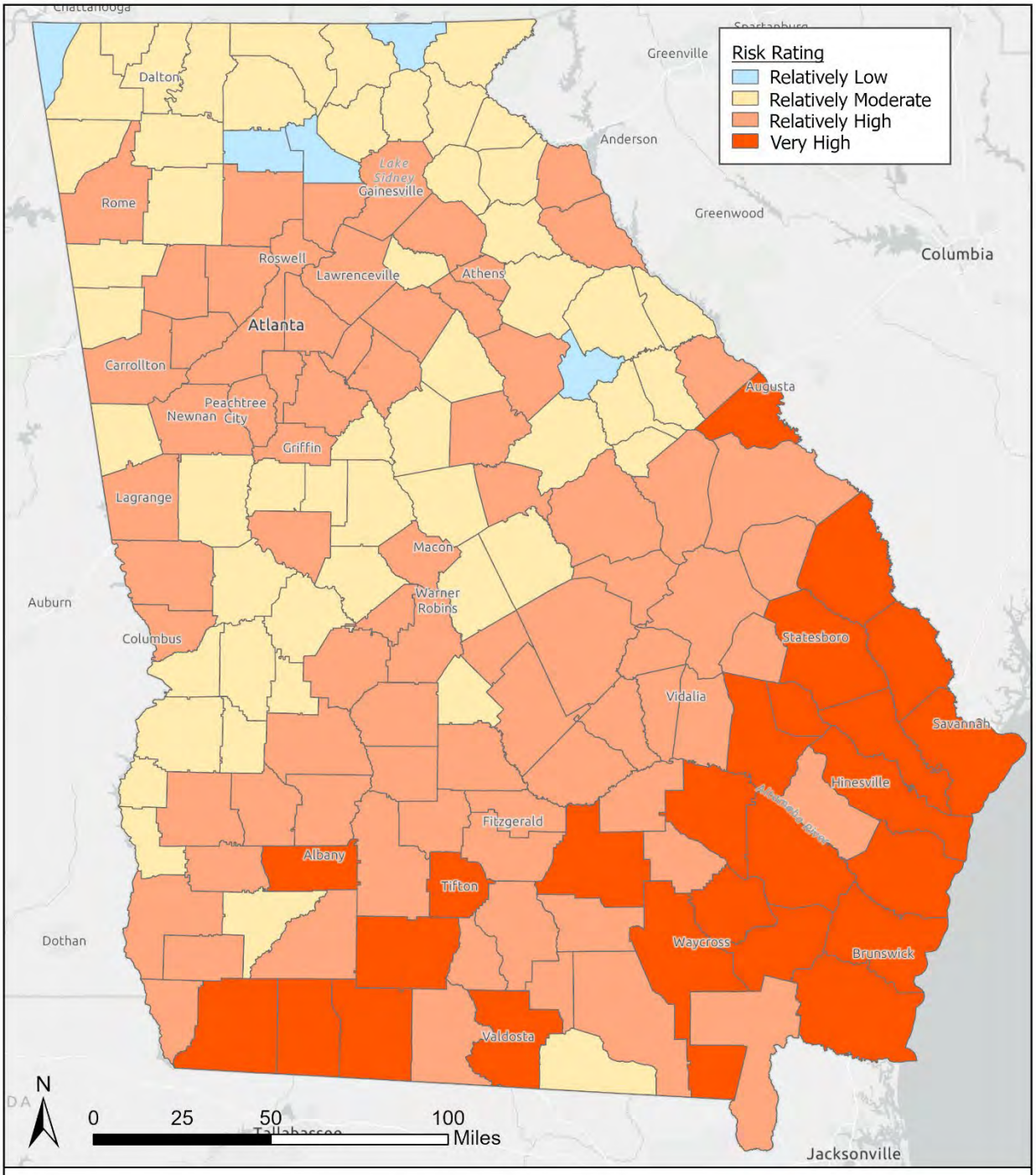
Hurricanes are a high priority hazard in the GHMS, ranked third overall.

Hurricanes can cause catastrophic damage to coastlines and areas several hundred miles inland. Hurricanes can produce winds exceeding 155 miles per hour as well as tornadoes and microbursts. Additionally, hurricanes can create storm surges along the coast and cause extensive damage from heavy rainfall. Floods and flying debris from the excessive winds are often the deadly and destructive results of these weather events. Slow moving hurricanes traveling into mountainous regions tend to produce especially heavy rain. Excessive rain can trigger landslides or mud slides. Flash flooding can occur due to intense rainfall.

Best practices can mitigate damage to broadband infrastructure from hurricanes but cannot prevent damage. Connectivity path redundancy is essential, as is planning for potential power outages.

As shown in the map below, although all of Georgia's counties can experience hurricanes, those in Southwest Georgia and Georgia's coastal area are at Very High risk from hurricanes. Counties in Southwest Georgia are more adversely affected by hurricanes that enter from the Gulf of Mexico than by hurricanes from the Atlantic Ocean.

Figure 4: Risks from hurricanes in Georgia



It is anticipated that climate change could impact multiple characteristics of hurricanes. As the global temperature warms, the overall intensity of hurricane winds may increase by approximately three percent by the year 2100. However, this may be offset by an anticipated moderate decrease (approximately 15 percent) in the overall number of storms. [59]

12.2.2 Coastal hazards including coastal flooding

Coastal hazards including coastal flooding are a high priority hazard in the GHMS, ranked fifth overall.

Coastal flooding is defined as flooding of coastal areas not caused by tropical cyclone events. Coastal flooding is caused by strong, persistent onshore wind, high astronomical tide, and/or low atmospheric pressure, and it results in damage, erosion, flooding, fatalities, or injuries. Coastal areas are defined as those portions of coastal land zones adjacent to the waters and bays of the oceans.

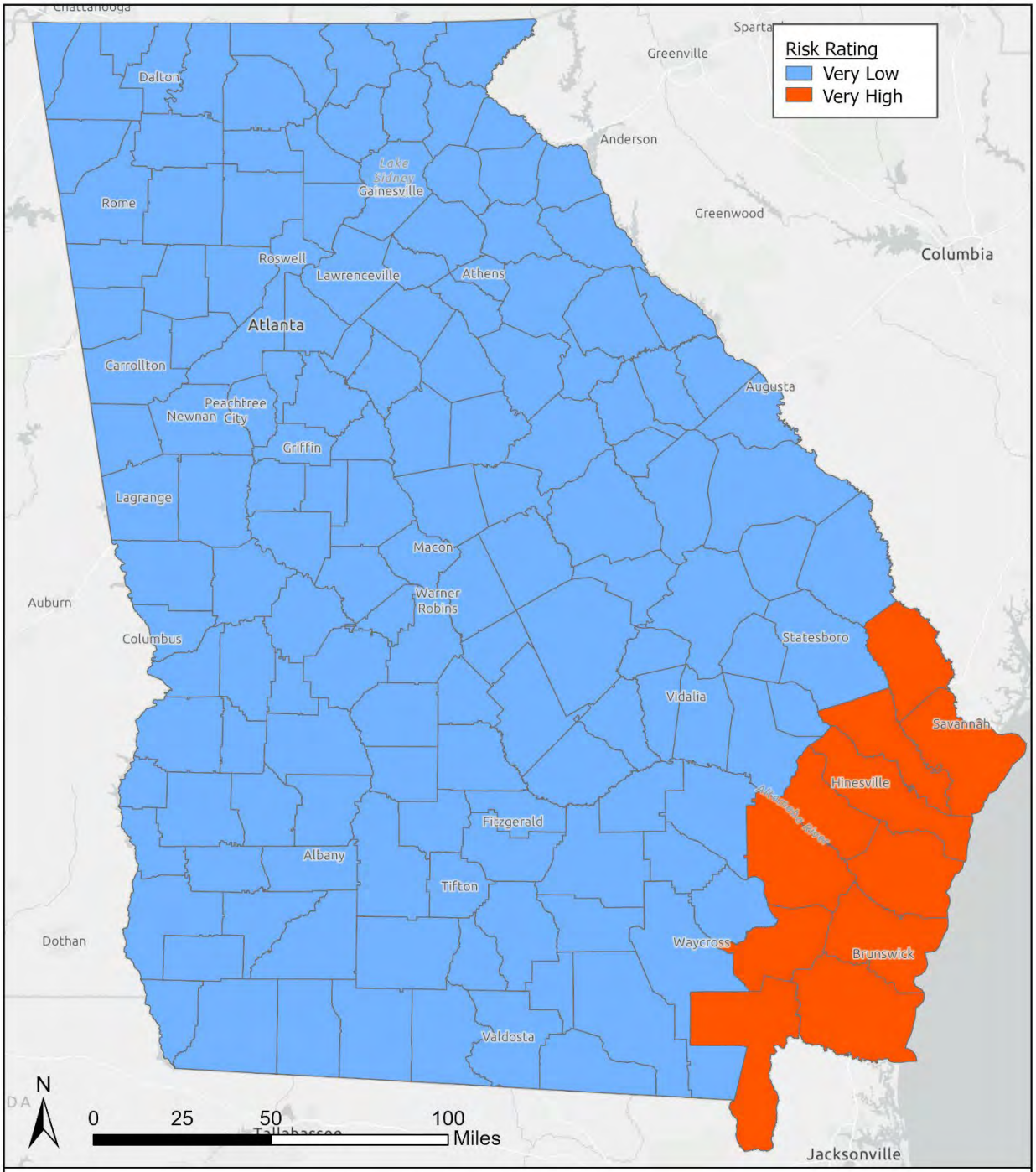
High surf is defined as large waves breaking on or near shore, resulting from swell spawned by a distant storm or from strong onshore winds, causing a fatality, injury, or damage. In addition, if accompanied by anomalous astronomical high tides, high surf can produce beach erosion and possible damage to beachfront structures. High surf conditions are usually accompanied by rip currents and near-shore breaks.

As climate change continues and sea level rise occurs, coastal areas of Georgia will be more at risk. Tidal cycles will not grow more or less intense, but with a higher mean sea level, the same strength of tide could result in higher tide levels than were historically normal.

As shown in the map below, Georgia's Atlantic counties are at Very High risk for coastal flooding. In these counties, broadband infrastructure planning should take into account the risk of coastal flooding. Given the increase in intense rainfall that has occurred in recent years and the climate projections for continued changes in atmospheric conditions, risks from inland flooding are expected to increase in magnitude and area over time and could pose a greater threat to BEAD assets over time. Future screenings should evaluate additional counties and risk levels to accurately account for the anticipated increased risk of flooding.

[59] "Can we expect Atlantic hurricanes to change over the coming century due to global warming?" National Oceanic and Atmospheric Administration, https://www.climate.gov/news-features/blogs/beyond-data/can-we-expect-atlantic-hurricanes-change-over-coming-century-due (accessed 10/19/2023).

Figure 5: Risks from coastal flooding in Georgia



12.2.3 Wind

The GHMS lists wind as a medium priority risk, ranked ninth overall. Georgia has experienced approximately 45 wind events per year, which equates to a very high certainty of at least one event occurring each year.

The following definitions are from the National Centers for Environmental Information of the National Oceanic and Atmospheric Administration (NOAA).

> **High Wind:** Sustained non-convective winds of 35 knots (40 mph) or greater lasting for one hour or longer, or winds (sustained or gusts) of 50 knots (58 mph) for any duration (or otherwise locally/regionally defined), on a widespread or localized basis.
>
> **Strong Wind:** Non-convective winds gusting less than 50 knots (58 mph), or sustained winds less than 35 knots (40 mph) resulting in a fatality, injury, or damage.
>
> **Thunderstorm Wind:** Winds, arising from convection (occurring within 30 minutes of lightning being observed or detected), with speeds of at least 50 knots (58 mph), or winds of any speed (non-severe thunderstorm winds below 50 knots) producing a fatality, injury, or damage.

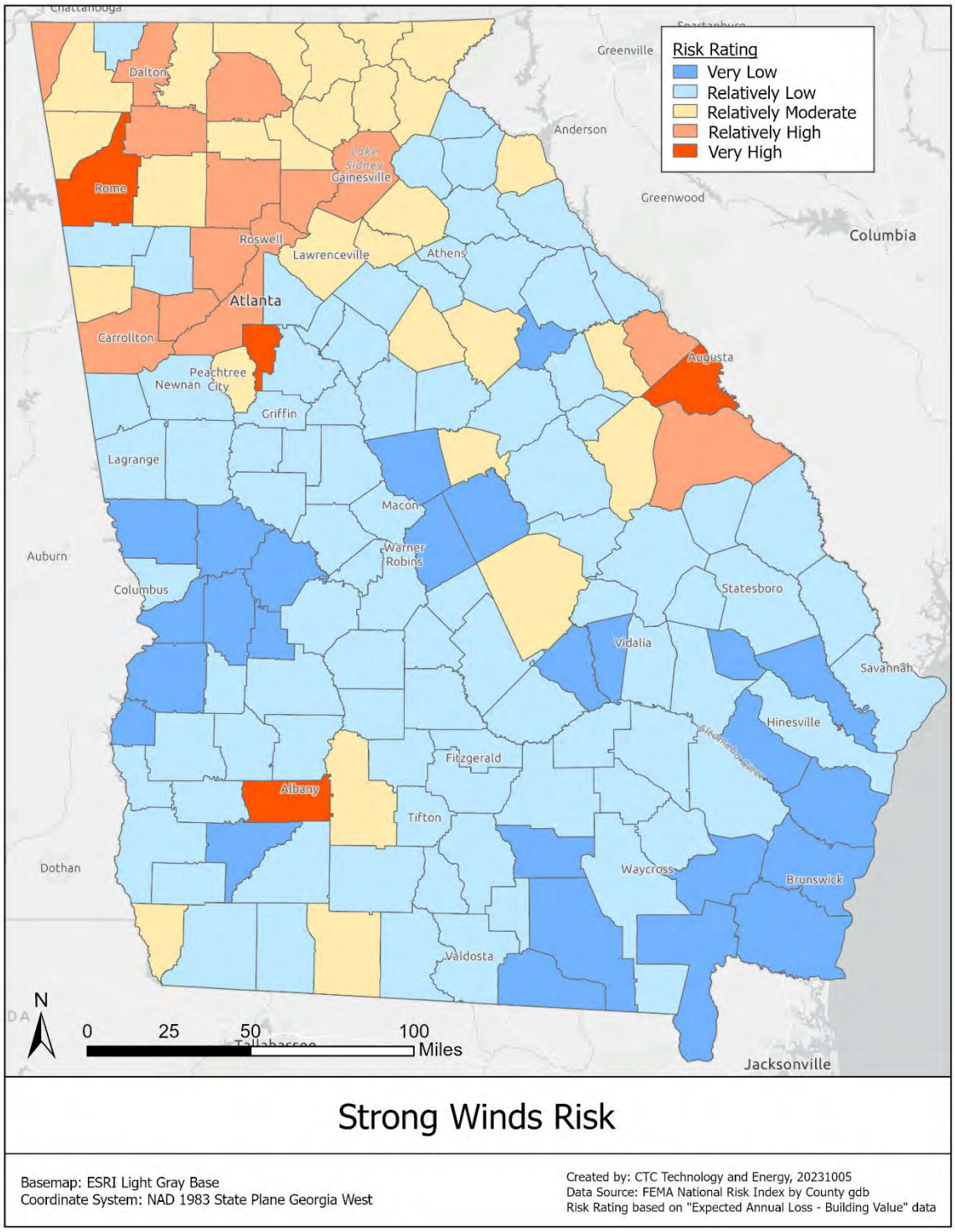
Downbursts, including dry or wet microbursts or macrobursts, are classified as Thunderstorm Wind events. In some cases, the downburst may travel several miles away from the parent thunderstorm, or the parent thunderstorm may have dissipated.

A *gustnado* is a small and usually weak whirlwind that forms as an eddy in thunderstorm outflows. It does not connect with any cloud-base rotation and is not a tornado. Since their origin is associated with cumuliform clouds, gustnadoes are classified as Thunderstorm Wind events.

As shown in the map below, FEMA ranks counties scattered across Georgia as at Very High or Relatively High risk of strong winds. Broadband infrastructure planning will need to take these risks into account.

Given that a changing climate increases the risks of many types of storms, the risk of high winds is also expected to increase in the future. As a result, broadband planning should continue to evaluate poles and other deployment to ensure they will withstand increased wind in the future.

Figure 6: Risks from high winds in Georgia



Population growth, increased density, and financial growth are expected to contribute more to the increasing level of damage from wind than climate change, at least until the effects of climate change are better understood.

12.2.4 Severe weather including hail and lightning

The GHMS ranks "severe weather"—which includes hail, lightning, and thunderstorms—as a high priority risk, fourth overall in Georgia.

Thunderstorms are formed when moist air near the earth's surface is forced upward through some catalyst (convection or frontal system). As the moist air rises, the air condenses to form clouds. Because condensation is a warming process, the cloud continues to expand upward. When the initial updraft is halted by the upper troposphere both an anvil shape and a downdraft form. This system of updrafting and downdrafting air columns is termed a "cell."

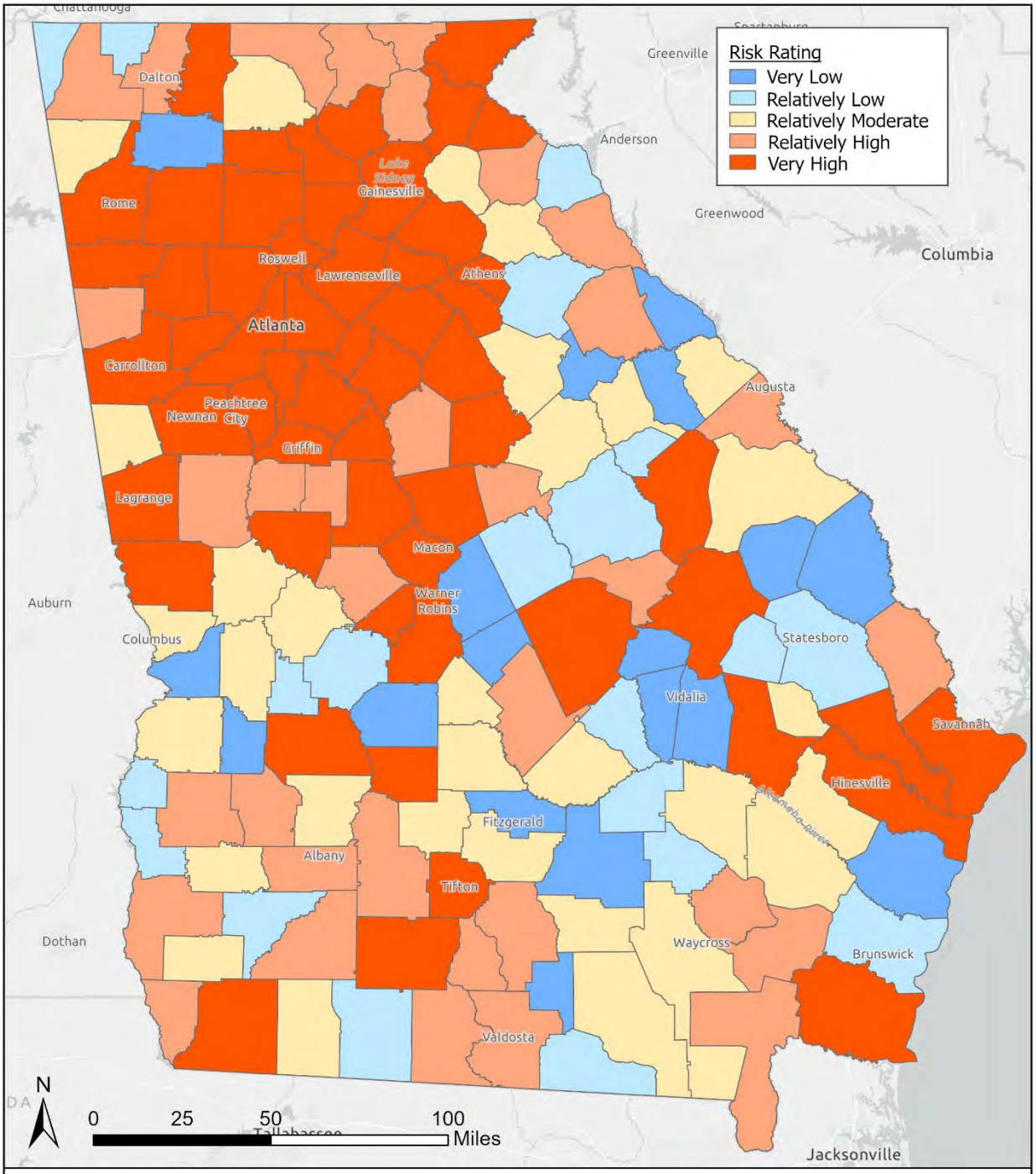
As the process of updrafts and downdrafts feeds the cell, the interior particulates of the cloud collide and combine to form rain and hail, which falls when the formations are heavy enough to push through the updraft. The collision of the water and ice particles within the cloud creates a large electrical field that must discharge to reduce charge separation. This discharge is the lightning that occurs from cloud to ground or cloud to cloud in the thunderstorm cell. In the final stage of development, the updraft weakens as the downdraft-driven precipitation continues until the cell dies.

Each thunderstorm cell can extend several miles across its base and reach 40,000 feet in altitude. Thunderstorm cells can compound and move abreast to form a squall line of cells, extending farther than any individual cell's potential. Thunderstorms exhibit no true seasonality and can occur throughout the year.

Lightning occurs when the difference between the positive and negative charges of the upper layers of the cloud and the earth's surface becomes great enough to overcome the resistance of the insulating air. The current flows along the forced conductive path to the surface (in cloud to ground lightning) and reaches up to 100 million volts of electrical potential. In Georgia, lightning strikes peak in July, with June and August experiencing the next highest numbers of strikes.

As shown in the map below, numerous counties throughout Georgia are a Very High or Relatively High risk of lightning. Lightning can directly damage broadband infrastructure and can disrupt broadband service via damage to the utility power infrastructure.

Figure 7: Risks from lightning in Georgia

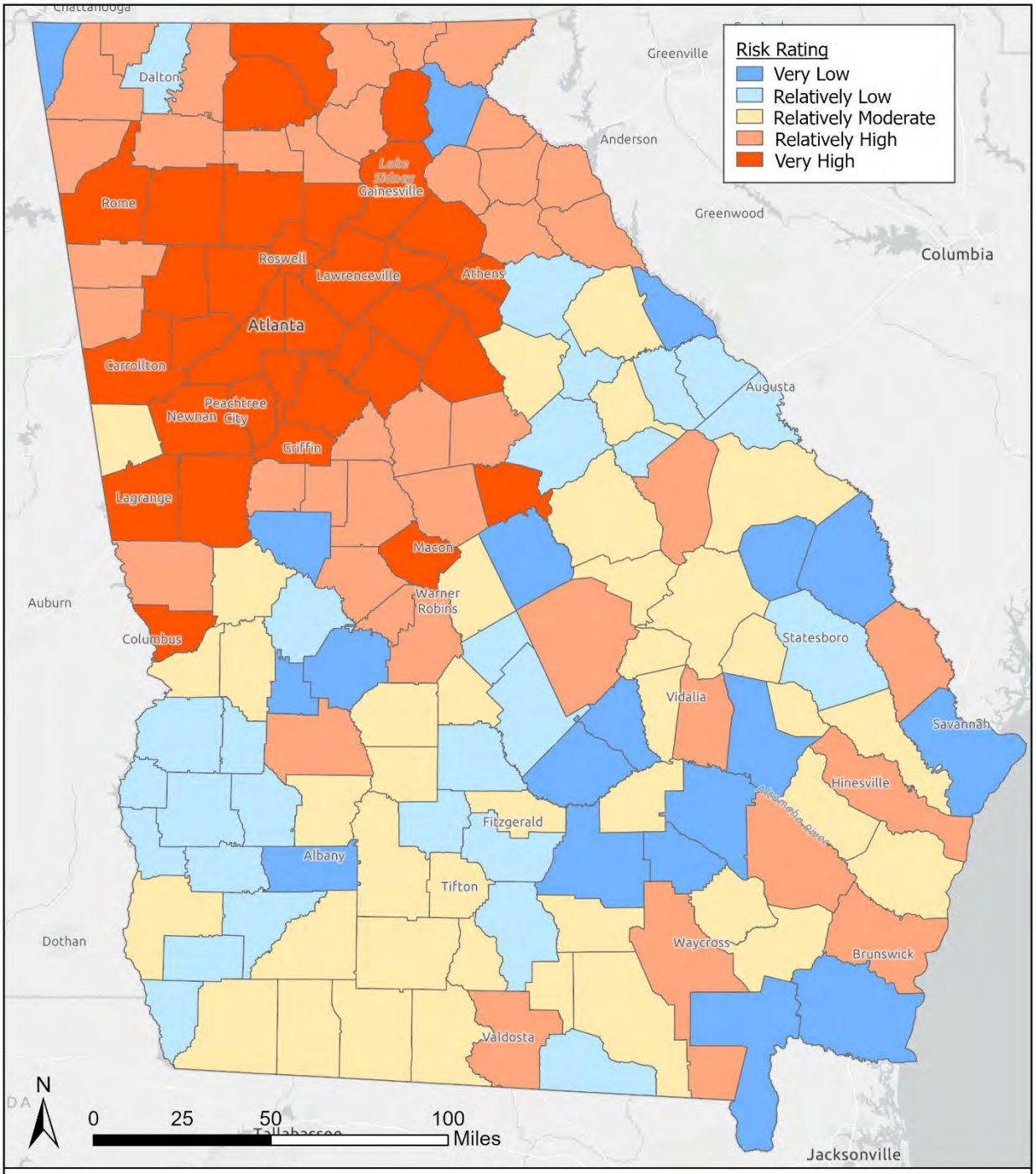


Hail is a type of precipitation that forms during the updraft- and downdraft-driven turbulence within the cloud. The hailstones are formed by layers of accumulated ice (with more layers creating larger hailstones) that can range from the size of a pea to the size of a grapefruit. In Georgia, hail of up to 2.75 inches in diameter has been recorded.

As shown in the map below, numerous counties, especially those to the North and West of Georgia, are at Very High or Relatively High risk of hail. Hail can damage infrastructure and BEAD deployment in these areas should take the risk of hail into account.

Changing climate conditions may result in warmer winters, the benefits of which may in time include a lower frequency of hail events. This would reduce the risk from hail across the state. However, it is difficult to predict this system due to the uncertainties in long term climate models.

Figure 8: Risks from hail in Georgia



Population growth, increased density, and financial growth are expected to contribute more to the increasing level of damage from hail and lightning than climate change, at least until the effects of climate change are better understood.

12.2.5 Tornadoes

The GHMS ranks tornadoes as Georgia's top risk and a high priority. A tornado is a violently rotating column of air (seen only when containing condensation, dust, or debris) in contact with the surface of the ground. Exceptionally large tornadoes may not exhibit the classic "funnel" shape but can appear as a large, turbulent cloud near the ground or a large rain shaft. The most violent tornadoes are less than one percent of all tornadoes, but can last for more than an hour and can have winds greater than 166 mph.

Although tornadoes can occur in most locations, most tornado activity in the United States takes place in the Midwest and Southeast. Within the State of Georgia, tornadoes can occur anywhere. In terms of the continuum of area of impact for hazard events, tornadoes are fairly isolated. Typically ranging from a few hundred feet to one or two miles across, tornadoes affect far less area than larger meteorological events such as hurricanes, winter storms, and severe weather.

An exact season does not exist for tornadoes; however, most occur in early spring to midsummer (February to June). The rate of onset of tornado events is rapid. Typically, the first sign of the tornado is a descending funnel cloud. This sign may be only minutes from the peak of the event, giving those in danger minimal sheltering time. However, meteorological warning systems attempt to afford those in danger more time to shelter. The frequency of specific tornado intensities is undetermined because no pattern seems to exist in occurrence. Finally, the duration of tornado events ranges from the few minutes of impact at a particular location to the actual tornado lasting up to a few hours.

Historical data show a100 percent probability of a tornado occurring in any given year. Notably, many tornadoes occur as a part of a larger outbreak of separate tornado events. For example, a weekend-long tornado outbreak in January 2017 included over 40 separate events in one weekend. On the other hand, other years have recorded as few as three occurrences.

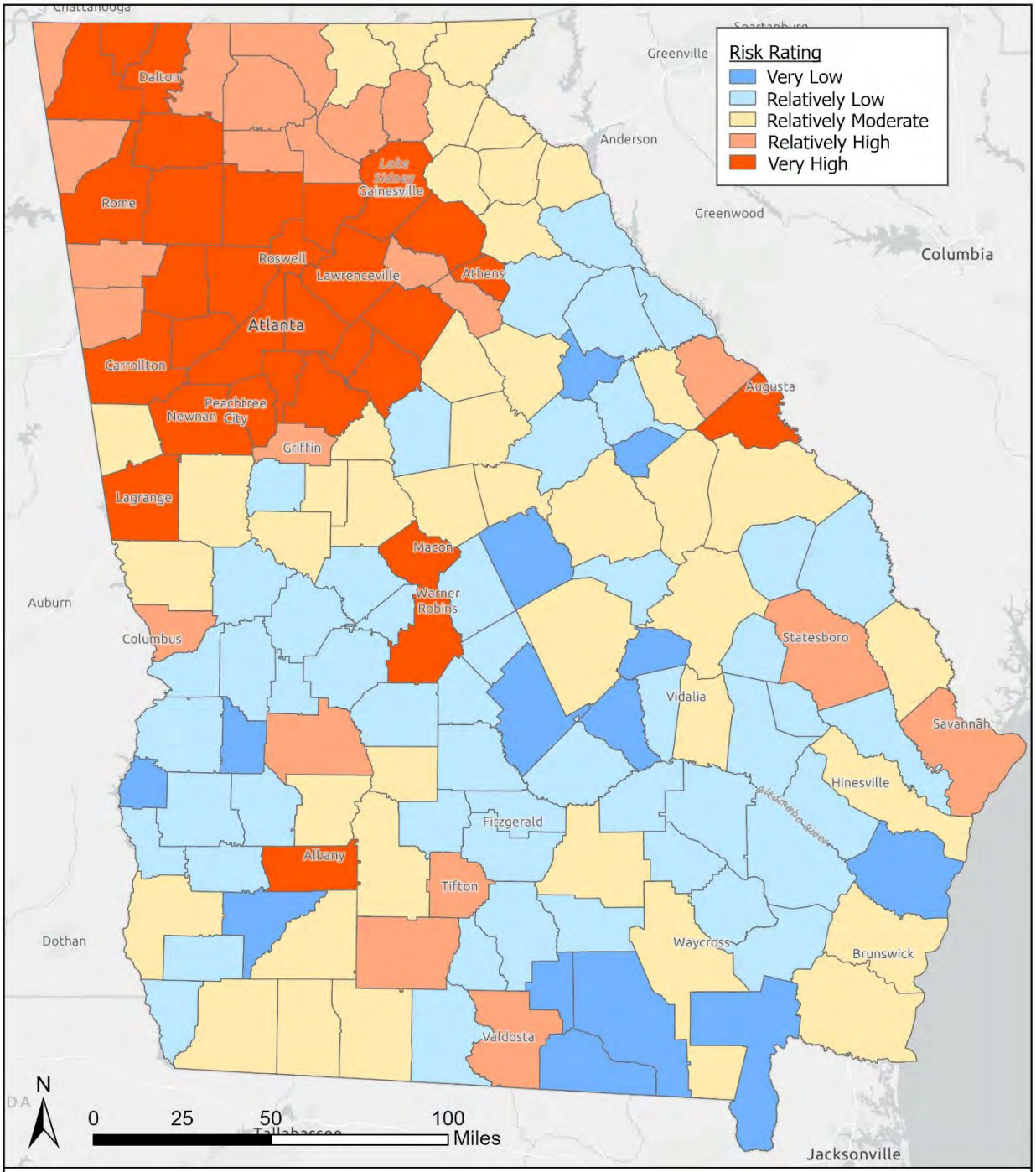
As shown in the map below, counties across Georgia are at Very High or Relatively High risk of tornadoes, including those in the Atlanta area. Construction teams in these areas need to adopt mitigation measures.

It is difficult to predict the impacts of a changing climate on tornadoes, as elements of tornado causes are predicted to undergo different changes in the future, with air moisture and

atmospheric instability are predicted to increase while wind shear is predicted to decrease.[60] Patterns in tornadoes will be monitored by relevant Georgia agencies and the resulting information should be factored into broadband planning and risk management.

[60] "Tornadoes and Climate Change," National Geographic, https://education.nationalgeographic.org/resource/tornadoes-and-climate-change/.

Figure 9: Risks from tornadoes in Georgia



Population growth, increased density, and financial growth are expected to contribute more to the increasing level of damage from tornadoes than climate change, at least until the effects of climate change are better understood.

12.2.6 Inland flooding

The GHMS ranks inland flooding as Georgia's second highest risk, and a high priority. The overflow of inland or tidal waters or the unusual and rapid accumulation or runoff of surface waters from any source and any resulting mudslides or mudflows can cause inland flooding.

The GHMS separately ranks dam failure as a medium priority hazard, eleventh overall in Georgia. In Georgia, all the major rivers are dammed at least once before leaving the state's boundaries. Also, numerous smaller dams, including agricultural dams, exist throughout the state. Therefore, the possibility of dam failure hazards exists throughout the state. The spatial extent of a dam failure event depends on the amount of water within the dammed reservoir and the downstream topography. Because of the high velocity of the water, flooding can strike beyond known floodplains.

Dam failures often have a rapid rate of onset, leaving little time for evacuation. The first signs of failure may go unnoticed upon visual inspection of the dam structure. However, continual maintenance and inspection of dams often provides knowledge on the possibility of failure with certain precipitation amounts. The duration of the flooding event caused by the failure also depends on the amount of water and downstream topography. Given smaller volumes of water and a topography suited for transporting the water rapidly downstream, the event may only last hours. Because of the lack of seasonality and other predictive factors, the frequency of dam failures cannot be determined. Dam failures could have a significant impact on broadband infrastructure.

In Georgia, flooding is highly dependent on precipitation amounts and is highly variable within the state. Georgia's climate is primarily affected by latitude, proximity to the Atlantic Ocean and Gulf of Mexico, and topography. Certain seasons are more prone to flooding based on the likelihood of excessive precipitation. Typically, the wet seasons are winter, early spring, and midsummer, and the drier seasons are fall and late spring. However, this varies across the state with the northern portion receiving maximum precipitation amounts during the winter as a result of frontal systems, whereas Central and Coastal Georgia receive maximums in the mid to late summer.

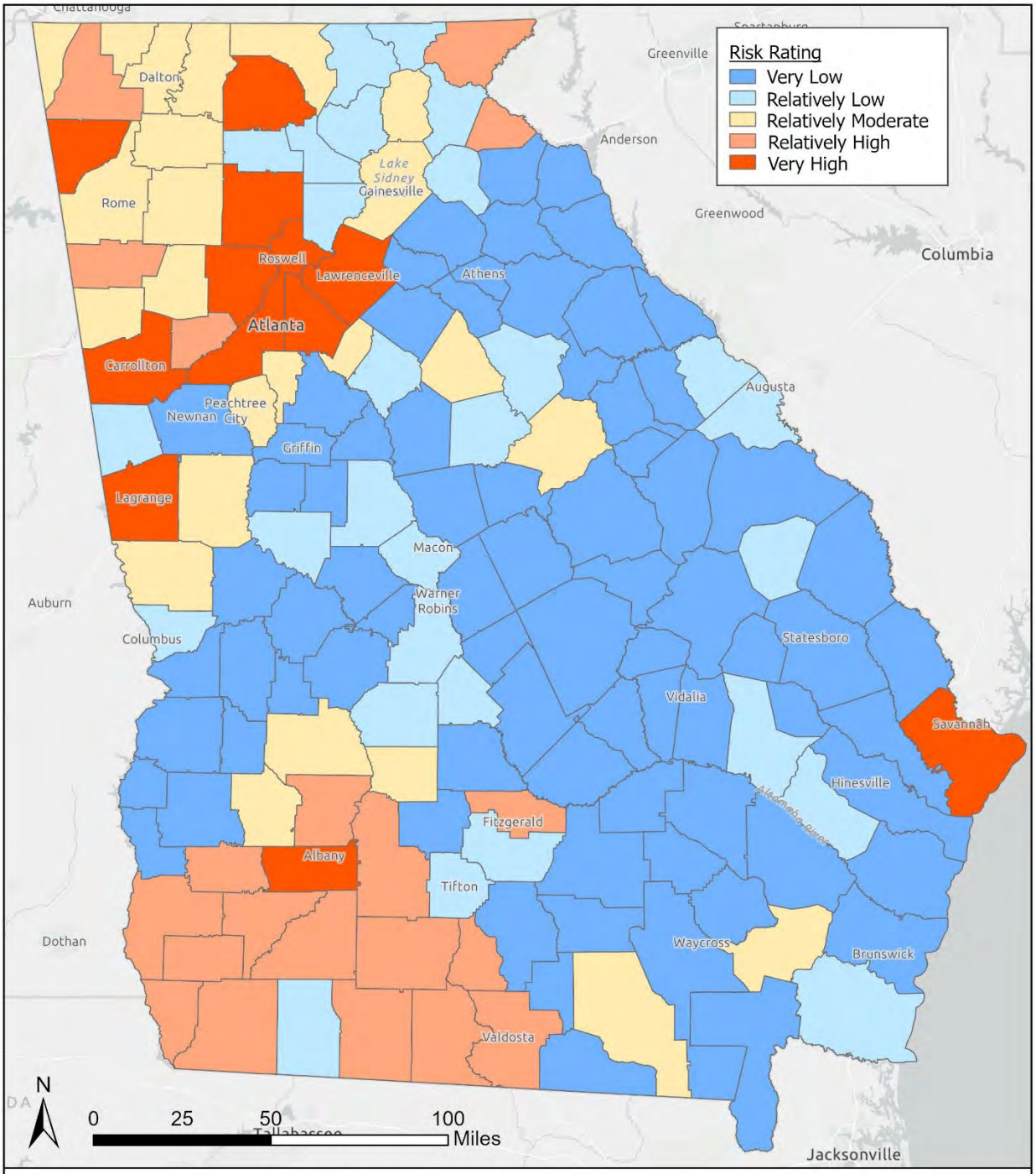
Riverine flooding occurs from inland water bodies such as streams and rivers. Riverine flooding is often classified as either typical or flash based on the rate of onset. The former is slow to build, peak, and recede, often allowing sufficient time for evacuations. The latter type of riverine

flooding is referred to as a “flash” flood, which rapidly peaks and recedes, giving insufficient time for evacuations. The more dangerous flash floods are common to the mountainous, impermeable surfaces of northern Georgia. Urban flash flooding can also present dangerous conditions, especially with roads washing out.

As shown in the map below, several counties are at Very High risk of riverine flooding, and additional counties are at Relatively High risk of riverine flooding. Broadband infrastructure planning will need to take these risks into account.

Projections of future climate conditions indicate that there may be an increase in intense rainfall due to increased atmospheric instability, air temperature, and air moisture. Future broadband planning and risk management, as well as evaluations of BEAD-funded projects, would benefit from considering the possibility of an increased risk of flooding in more areas.

Figure 10: Risks from riverine flooding in Georgia



Georgia has experienced a three percent to six percent decrease in flood magnitude over the past decade. However, major weather factors that contribute to flooding include heavy or prolonged precipitation, snowmelt, thunderstorms, storm surges from hurricanes, and ice or debris jams. Human factors that contribute to flooding include structural failures of dams and levees, altered drainage, and land-cover alterations (such as pavement). Increasingly, temperature warming increases heavy downpours, causes more extensive storm surges due to sea level rise, and leads to more rapid spring snowmelt. The risks from future floods are significant, given expanded development in coastal areas and floodplains, unabated urbanization, land-use changes, and climate change. Because of this, flooding may intensify in many U.S. regions, even in areas where total precipitation is projected to decline.

For Georgia, the risk for all flooding types—flash floods, river floods, and urban floods, all potentially leading to dam failure—will theoretically increase if precipitation occurs more frequently or falls more efficiently.

12.2.7 Drought

The GHMS ranks drought as a medium priority, sixth overall in Georgia. Drought is a normal, recurrent feature of climate consisting of a deficiency of precipitation over an extended period of time (usually a season or more). This deficiency results in a water shortage for some social or environmental sectors. Drought should be judged relative to some long-term average condition of balance between precipitation and evapotranspiration in a particular area that is considered "normal." Drought should not be viewed as only a natural hazard because the demand people place on the water supply affects perceptions of drought conditions. The impacts of drought are vast, including limited water supplies in urban areas and insufficient water for farmland.

Droughts occur in virtually every climatic zone (on every continent). Because the impacts of drought conditions are largely dependent on the human activity in the area, the spatial extent of droughts can span a few counties to an entire country.

Typically, the risk analysis of hazard events considers the recurrence interval of the hazard. Droughts, however, are not measured in terms of recurrence intervals. Instead, drought prediction and indication models utilize historical and current meteorological and geological data to determine the current and possible extent of drought conditions.

The U.S. Drought Monitor, a partnership between the National Drought Mitigation Center at the University of Nebraska-Lincoln, the United States Department of Agriculture and the National Oceanic and Atmospheric Administration, regularly updates drought maps of the United States.[61]

[61] U.S. Drought Monitor, https://droughtmonitor.unl.edu/.

The Georgia map shows that some counties in the western part of the state are experiencing drought conditions.[62]

Drought's impact on infrastructure can include reduced hydropower generation and reduced local water supplies. Drought impacts agriculture directly but is not likely to directly impact broadband infrastructure.

With climate change, Georgia could experience more frequent and/or more severe droughts, but not by a significant margin. Higher temperatures lead to increased rates of evaporation, including more loss of moisture through plant leaves. As soil dries out, a larger proportion of the incoming heat from the sun goes into heating the soil and adjacent air rather than evaporating its moisture, resulting in hotter summers under drier climatic conditions.

12.2.8 Wildfires

The GHMS ranks wildfires as a medium priority hazard, eighth overall in Georgia. A wildfire is an uncontained fire that spreads through the environment. Wildfires have the ability to consume large areas, including infrastructure, property, and resources. When massive fires, or conflagrations, develop near populated areas, evacuations can take place. Not only do the flames harm the environment, but the massive volumes of smoke spread by certain atmospheric conditions also affect the health of nearby populations.

Wildfires result from the interaction of three crucial elements: fuel, ignition (heat), and oxygen. Natural and man-made forces cause the three crucial elements to coincide in a manner that produces wildfire events. Typically, fuel consists of natural vegetation. However, as the urban and suburban footprint expands, wildfires can use other types of fuel such as buildings. In terms of ignition or source of heat, the primary natural source is lightning. However, humans are more responsible for wildfires than lightning (causing around 80 percent of fires). Man-made sources vary from the unintentional (fireworks, campfires, machinery) to the intentional (arson). With the first two crucial elements provided, wildfires can spread as long as oxygen is present.

Weather is the most variable factor affecting wildfire behavior. Strong winds propel wildfires quickly across most landscapes (unless fire breaks are present). Shifting winds create erratic wildfires, complicating fire management. Dry conditions provide faster burning fuels, either making the area more vulnerable to wildfire or increasing the mobility of preexisting wildfires.

Wildfires are notorious for spawning secondary hazards, such as flash flooding and landslides, long after the original fire is extinguished. Both flash flooding and landslides result from fire consuming the vegetation that provides precipitation interception and infiltration as well as slope

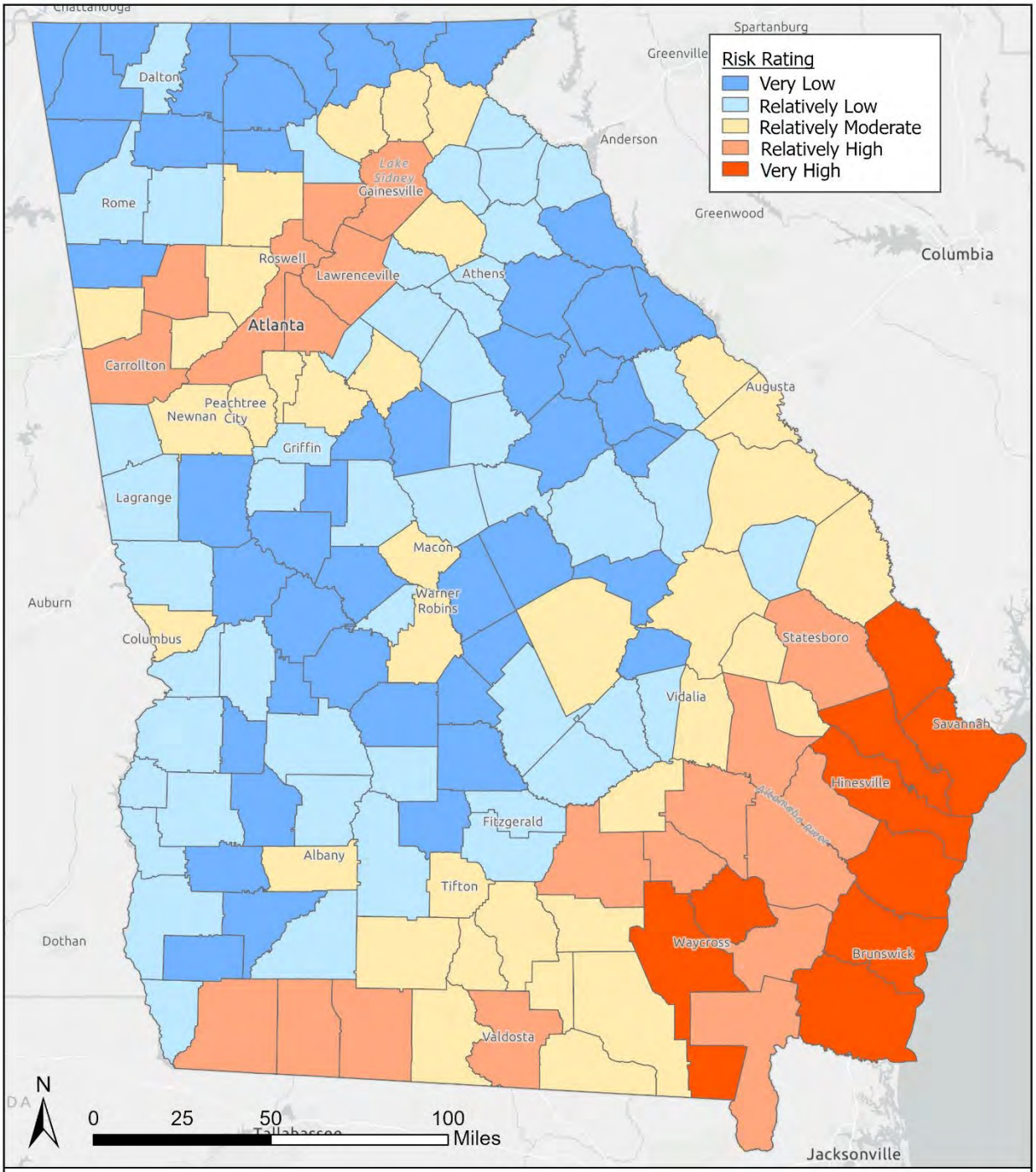
[62] "Georgia," U.S. Drought Monitor, https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?GA.

stability. All of Georgia is prone to wildfire due to presence of wildland fuels associated with wildfires.

The wildfires that cause the greatest loss of life and property are those located in the Wildland-Urban Interface (WUI). WUI has been defined in many ways, but from a fire management perspective, it is considered an area where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels.

As shown in the map below, counties in the Atlanta area and Georgia's South and East are at Relatively High risk of wildfires, and Georgia's coastal region is at Very High risk. Best practices in telecommunications network design for wildfire mitigation include redundancy. As temperatures increase, it is possible that wildfires will increase in frequency, although the manmade causes of wildfires make this difficult to predict conclusively.

Figure 11: Risks of wildfires in Georgia



Wildfire data do not show an obvious trend. However, ongoing changes in temperature, drought, and snowmelt may contribute to warmer, drier conditions that fuel wildfires in parts of the United States. Any increase in wildfire activity would be much more likely in the western United States, as fires burn more land in the western United States than in the East.

12.2.9 Extreme heat or heatwaves

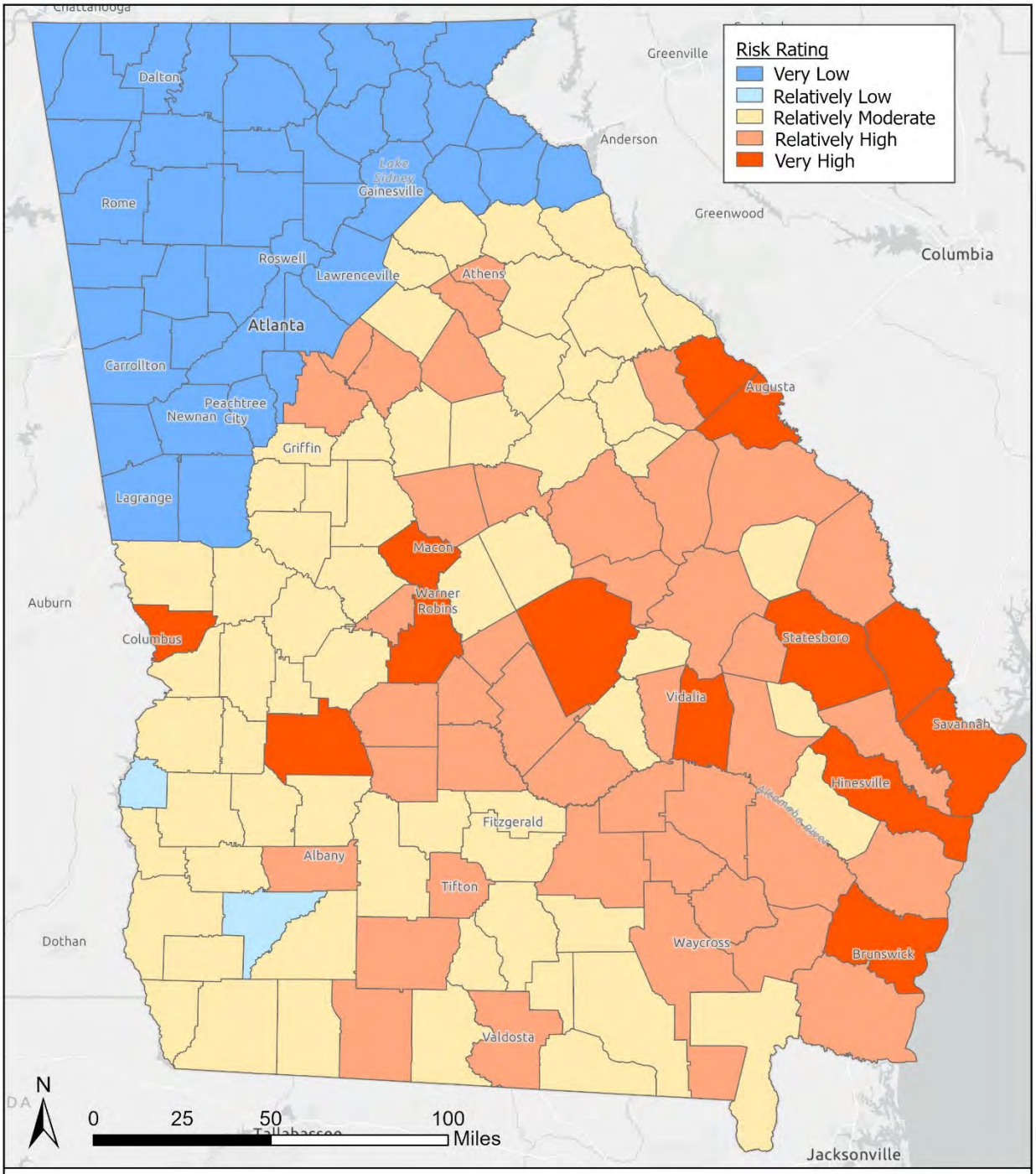
The GHMS added extreme heat to the list of hazards in Georgia for the first time, based on partner feedback. The GHMS ranks extreme heat as a medium priority hazard, tenth overall in Georgia. Official measures and scales of magnitude and intensity do not exist for extreme heat. The best way to determine a realistic magnitude for extreme heat would be based on temperatures and heat indices. According to the National Weather Service, the heat index is a measure of how hot it really feels when relative humidity is factored in with the actual air temperature.

A major impact of extreme heat events is taxing power systems, which can affect broadband service and infrastructure.

As shown in the map below, outside of Georgia's Northwest, nearly all counties are at least at Relatively Moderate risk from heatwaves, and many are at Very High risk.

Temperatures have increased in Georgia over the last decades, and they are currently projected to continue to increase over the time horizon of BEAD projects' lifespan and GTA's evaluations. Broadband projects should take into account the impact of heatwaves on power systems and their potential to increase in the future.

Figure 12: Risk from heat waves in Georgia



As temperatures rise, Georgia could become susceptible to more frequent and/or intense heat waves. Heat waves are periods of abnormally hot weather lasting days to weeks. The number of heat waves has been increasing, with the number of intense heat waves being almost triple the long-term average. Analyses show that climate change has generally increased the probability of heat waves, and prolonged (multi-month) extreme heat has been unprecedented since the start of reliable instrumental records in 1895.

12.3 Characterizing weather and climate risks to new infrastructure deployed using BEAD program funding for next 20 years

The top natural hazard risks impact broadband infrastructure in the following ways: through power outages,[63] through equipment damage,[64] and through signal degradation.[65] While signal degradation is a short-term risk that accompanies inclement weather and is typically resolved when the weather event is over, power outages have a longer-term time impact as they require repair. Equipment damage also has a longer-term time impact, and furthermore it is cumulative and can compound year upon year, for example a utility pole that becomes more unsteady after years of impact from winds and falling branches. As such, signal degradation is a concern that may remain relatively consistent over time, whereas risks of equipment degradation are likely to increase over the time horizon of 20 years.

Table 14: Threats to infrastructure posed by weather and climate risks

Risks	Potential causes
Power outages	Strong winds, hurricanes, ice storms, flooding
Equipment damage	Lightning, tornadoes, ice storms, flooding, hail, wildfires
Signal degradation	Flooding, hail

Strong winds, hurricanes, ice storms, and other hazards can cause power lines to go down or power to be turned off for safety, resulting in a break in internet accessibility. Additionally, aerial fiber (and coaxial cable) is frequently over lashed on power lines that run along poles. When tree branches or ice cause power lines to break, the applied force may also damage the over lashed asset. This risk is raised when a technician untrained in internet infrastructure or fiber attempts to fix the downed power lines by cutting through otherwise intact fiber.

[63] "Evaluation of Hurricane Harvey's Effects on the Internet's Edge," University of Southern California ANT Lab, https://ant.isi.edu/outage/ani/harvey/index.html.
[64] "Fiber-Optic Cables Cut: What are the Consequences and How to Fix It," Clooms, March 22, 2021, https://www.clooms.com/fiber-optic-cables-cut/.
[65] "Does Rain Affect WiFi?" WXResearch, May 10, 2023, https://wxresearch.org/does-rain-affect-wifi/.

Risks such as lightning, tornadoes, flooding, and wildfires can threaten aerial assets of all kinds. Intense winds and debris can damage fiber and even knock down utility poles. Lightning can strike antenna and satellite equipment that is necessary for fixed wireless communications. In either case, the result is severed connectivity.

In addition, risks such as floods and hail can cause the signal between fixed wireless transmitters and receivers to be absorbed or scattered, weakening their performance.

12.3.1 Severe winter weather including ice storms

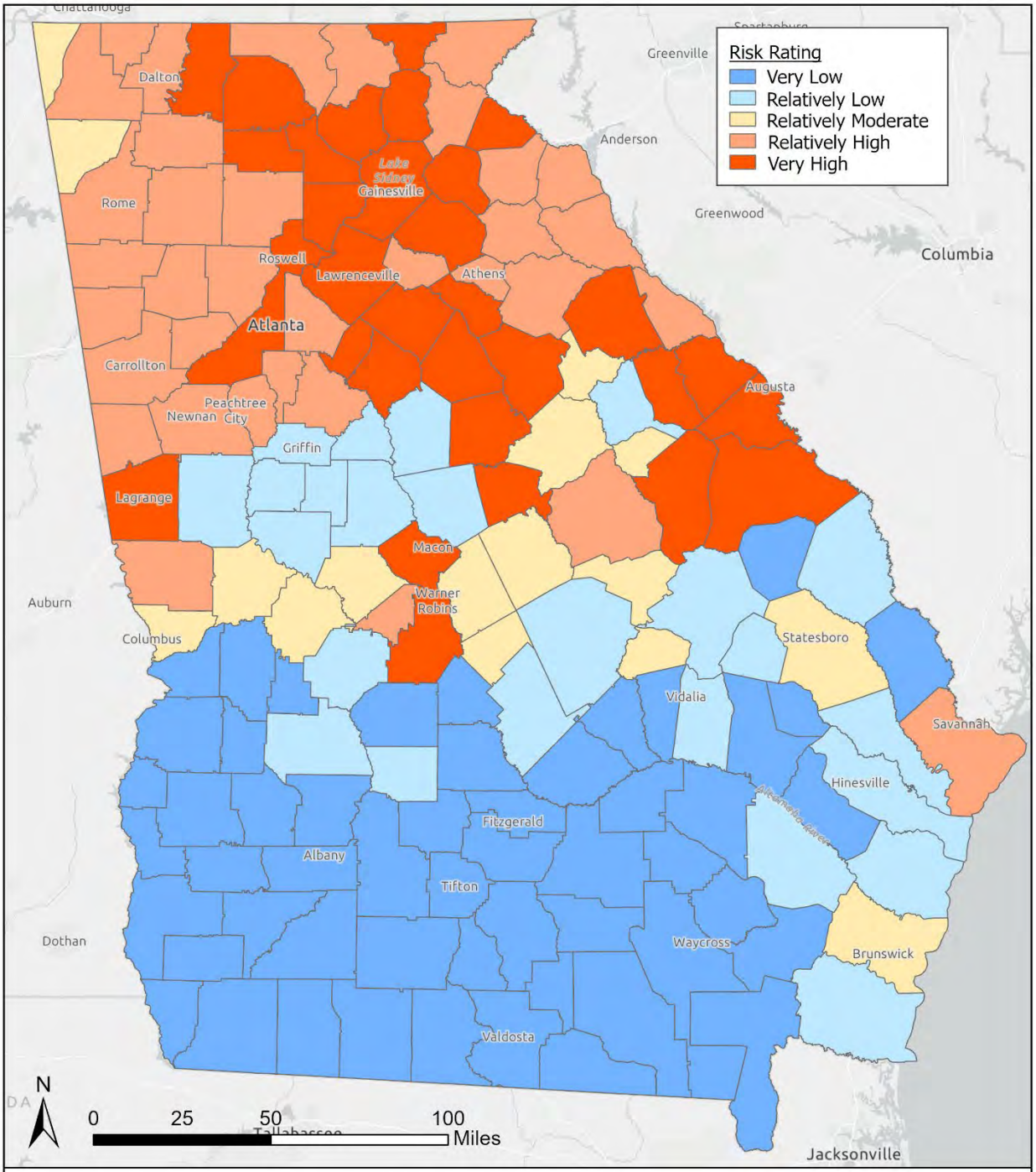
The GHMS ranks severe winter weather as Georgia's seventh hazard and a medium priority. Severe winter storms bring the threat of ice. Freezing rain consists of super-cooled falling liquid precipitation that freezes on contact with the surface when temperatures are below freezing. This results in ice glazing on exposed surfaces including buildings, roads, and power lines. Sleet is easily discernable from freezing rain in that the precipitation freezes before hitting the surface.

Ice can damage or destroy telecommunications infrastructure including aerial lines, poles, and towers. A major ice storm occurred in 2014, bringing up to one inch of ice to the eastern portion of the state near Augusta.

Severe winter weather is seasonal, with most storms occurring between January and March, with the highest probability of occurrence in February. The rate of onset and duration varies, depending on the weather system driving the storm. Georgia rarely experiences severe winter weather; however, the impacts of the storms substantiate severe winter weather's inclusion in risk assessments for most southern states.

As shown in the map below, most of the counties that are at Very High or Relatively High risk of ice storms are in the northern half of Georgia. BEAD construction teams should deploy mitigation strategies in these areas.

Figure 13: Risks from ice storms in Georgia



Winter storms have increased in frequency and intensity since the 1950s, and their tracks have shifted northward over the United States. This trend will likely continue over the United States but given the northward shift in the tracks of these systems, impacts to Georgia may remain unchanged in the target time horizon of the next 20 years. In other words, the increase in intensity may be offset in Georgia by the northward shift of the storm tracks.

12.4 Strategies for mitigating climate risks

Network infrastructure deployment generally utilizes principles of resilient and reliable networks, which mitigate risks against natural hazards. Since BEAD awardees will be familiar with these practices and incentivized by their profit motive to deploy resilient network technology, the State will focus on providing guidance in areas where additional risk mitigation techniques should be considered. The following subsections discuss both hazard mitigation best practices that the anticipated BEAD funded projects in Georgia are likely to include, and how the State will adopt processes to ensure climate resiliency.

12.4.1 Hazard mitigation for anticipated BEAD-funded projects in Georgia

Although BEAD funding prioritizes fiber optic deployments, given the level of funding for Georgia compared to anticipated need, fixed wireless and other alternative technologies may make up a portion of BEAD deployments.

Fiber optic cable is preferred because it is future-proof. It is also one of the most resilient media for broadband: it is well encased and protected and does not require power except for a limited amount of network equipment huts and locations with active electronics.

Mitigating current climate events are typically incorporated into the practices of any ISP, who has a vested interest in ensuring business continuity to manage customer satisfaction and operational costs. Burying fiber is the best mitigation to natural hazards, but they too should be supplemented with standard best practices optimizing network resilience, such as equipment and path diversity.

For current and planned aerial fiber, wireline broadband providers generally depend on utility pole owner actions. Fiber optic cables do not need power and continue to provide signal transport even when the cable is down.

In terms of preventing poles from failing, best practices in critical infrastructure protection are continuously evolving. Poles that are older and/or experience previous strains are weakened and more likely to fail in future events. Mitigation of such risks involves estimating pole risks based on previous events. Detailed local data may not be available, but if data are available, they can be incorporated into communications infrastructure risk management.

For aerial fiber, the long-term risk mitigation follows the mitigation strategies targeted at power lines. In general, changes in the severity and frequency of natural hazards have a longer time horizon and allow for gradually implementing hardening efforts. When risks and outages become too frequent, power utilities will convert aerial to buried in vulnerable segments and wireline broadband providers can simply follow their lead and cadence. For communications providers risk mitigations can therefore include any of the following on a gradual implementation basis:

- Aligning with power utilities burying aerial power lines.
- Adding more redundant network paths.
- Increasing backup power capabilities at ISP network equipment sites and at customer end.

For fixed wireless deployment, tower owners typically make sure the tower is resilient against natural hazards and load studies are conducted frequently on such vertical assets. Owners of such vertical assets therefore typically make reinforcements as needed against different types of hazards.

12.4.2 Adopted risk mitigation processes

The State will ask all subgrantee applicants to have a business continuity plan which includes their natural hazard risk mitigation to broadband deployment and ask applicants whose project area includes identified high-risk areas to provide specific responses to how they will incorporate mitigation measures into their deployment planning. Additionally, the State will outline the following among the possible strategies grant participants can engage in to address natural hazard risks:

1. Favoring buried fiber compared to aerial in order to largely eliminate the above risks in many cases.
2. Retrofitting and hardening existing network assets that are deemed critical to BEAD expansion projects.
3. Favoring redundancy in network designs to reduce single points of failure.
4. Considering average down time and emergency response time in applicant selection.
5. Encouraging the use of back up, generator power systems where applicable.

12.5 Processes to ensure that evolving risks are continuously understood, characterized, and addressed

Since the creation of the 2005 Georgia Hazard Mitigation Strategy, the State of Georgia has conducted a series of regular meetings (quarterly through 2013, then annually since) of state agencies called the State Hazard Mitigation Planning Team (SHMPT). The purpose of these meetings is to establish and maintain relationships among state agencies with a focus on hazard mitigation within the State of Georgia. These regular meetings provide a means for the State Hazard Mitigation staff to update other state agencies and receive feedback on mitigation activities throughout the state, including the GHMS. In addition to the annual meetings, the SHMPT meets in the aftermath of major disasters in order to update plan information, exchange information, and review data. GTA participates in SHMPT meetings,[66] thereby ensuring that they are up to date on understanding risks and mitigation strategies, are participating in the characterization of hazards and their implications on infrastructure and are able to address these evolving risks in their planning and infrastructure considerations. As a part of SHMPT meetings, GTA may participate in future hazard mitigation planning activities to raise awareness of potential broadband considerations.

In the year before a new GHMS, GEMA/HS Hazard Mitigation Planning staff begin a more active update phase by conducting a summary review of the previous plan and update process. GEMA/HS holds workshops with federal and state agencies, nongovernmental/nonprofit organizations, and the private sector. Feedback is incorporated into the plan. For example, after a workshop for the 2018 GHMS, a new hazard, Extreme Heat, was added to the list of hazards to be profiled.

GEMA/HS identifies programs and initiatives that are relevant to hazard mitigation and incorporates them into the plan update where appropriate. Plans and initiatives are evaluated for alignment with the overall goals of Georgia's Hazard Mitigation Strategy: reducing human vulnerability to hazard events, reducing the losses associated with hazard events, and reducing the number of people and properties exposed to hazard events in Georgia. In alignment with GTA, GEMA/HS and first responder authorities have a stake in reliable, high-speed internet, as reliable communications networks save lives daily, especially during and after natural disasters.

[66] "Georgia Hazard Mitigation Strategy," GEMA/HS, 2019, https://gema.georgia.gov/sites/gema.georgia.gov/files/related_files/document/2019%20Georgia%20Hazard%20Mitigation%20Strategy.pdf.

13 Low-cost broadband service option (Requirement 16)

Though there are numerous barriers to internet adoption, affordability of service is a particularly relevant consideration in Georgia. The American Community Survey reports that 92.3 percent of Georgia residents have a home internet subscription of any kind which—while outperforming the national rate by two percentage points[67]—still indicates that a sizable number of Georgia households are disconnected from the internet at home. Among Georgia households that do not subscribe to internet service of any kind, an estimated 15 percent report that a primary reason they do not pay for an internet service at home is an inability to afford service.[68] Accordingly, low-income individuals are 15.6 percentage points less likely than higher-income individuals to have a home internet subscription[69]—highlighting the connection between affordability and internet adoption.

13.1 Low-cost broadband service options that must be offered and why the options best serve the needs of Georgia residents

Perhaps the most widely recognized intervention to lower the cost of internet service is the FCC's Affordable Connectivity Program (ACP), which subsidizes up to $30 per month for broadband for qualifying households and may include a one-time subsidy toward buying a laptop or tablet. Despite the benefit of the subsidy, the ACP is known to be greatly underutilized nationwide. In Georgia, about 38 percent of eligible households have enrolled in the ACP, surpassing the national rate of 36 percent.[70] Georgia has been a trailblazer in its efforts to increase ACP enrollment among eligible households. In the event that the ACP expires, and a successor program is not established, GTA will implement any guidance issued by NTIA regarding BEAD subrecipient participation in other federal programs that provide qualifying low-income consumers with subsidies on broadband internet access. In addition, GTA will require subgrantees to take reasonable steps to publicize discount programs it offers and work with the State to facilitate participation of eligible households in its discount programs.

Beyond providing relevant information for residents about the ACP on its website,[71] GTA has also aided the expansion of the ACP through its Capital Projects Fund grant program by requiring all awarded grantees to participate in the ACP.

[67] U.S. Census Bureau, American Community Survey Public Use Microdata, 2021. Accessed August 29, 2023.
[68] U.S. Census Bureau, Current Population Survey Public Use Microdata, November 2021. Accessed August 17, 2023.
[69] U.S. Census Bureau, American Community Survey Public Use Microdata, 2021. Accessed August 17, 2023.
[70] Estimates of eligible households based on proprietary model that uses American Community Survey Public Use Microdata to estimate number of households qualifying for ACP via several of its eligibility criteria.
[71] "Help for Consumers," Georgia Technology Authority, https://gta.georgia.gov/broadband/lets-connect-georgia/help-consumers.

Seizing upon the notable opportunity for expansion, in May of 2023, GTA introduced a statewide initiative, in collaboration with the nonprofit EducationSuperHighway,[72, 73] to spread awareness about and encourage participation in the ACP among eligible households in a manner that emphasizes building trust among Georgia residents. The initiative, which is led by the State and a coalition of more than 100 local governments, community organizations, businesses, and ISPs, has engaged in a massive statewide and local outreach campaign for the program.[74]

Additionally, the Georgia Department of Education's (GaDOE) Office of Rural Education and Innovation has initiated an effort to promote ACP participation through its Student Connect program, which actively operates an "ACP hotline" to assist with ACP enrollment. The program has also provided support services to Georgia school districts in an effort to enroll more households in the ACP.[75]

There are also many ISPs operating in Georgia that offer plans at low to nearly no cost for eligible subscribers who enroll in the ACP.[76]

Georgia residents can also apply for Lifeline—a federal program which subsidizes up to $9.25 of eligible consumers' monthly phone or internet service bill. The State of Georgia advertises and makes information about this federal program readily available on the GTA website.[77]

GTA notes the NTIA's clear intention to provide flexibility and to encourage states to develop a low-cost broadband service option that meets the particular needs of the state, given its priorities and circumstances. This deliberate flexibility and the ability of the states to develop their own approach to the low-cost broadband service option was affirmed several times by Assistant Secretary Alan Davidson in his testimony before the House Committee on Energy & Commerce Subcommittee on Communications & Technology on December 5, 2023 (see "House questions NTIA's Davidson on BEAD, spectrum," LightReading, December 5, 2023, https://www.lightreading.com/broadband/house-questions-ntia-s-davidson-on-bead-spectrum#close-modal).

[72] "Georgia Technology Authority launches statewide initiative to increase Affordable Connectivity Program (ACP) adoption," GTA website, https://gta.georgia.gov/news/2023-05-19/georgia-technology-authority-launches-statewide-initiative-increase-affordable.
[73] Available at https://getacp.org/Georgia.
[74] "ACP Pre-Enrollment Wizard," https://getacp.org/Georgia.
[75] "Rural Education and Innovation presentation," GaDOE, https://shealy-my.sharepoint.com/:p:/g/personal/bronwyn_ragan-martin_doe_k12_ga_us/EVNQvk9O94NIjLoS2WyDpJoB9aT8i7wSHHuoaWUlxtO3vw?e=Il8NPA.
[76] "Affordable Connectivity Program," FCC, https://www.fcc.gov/acp (accessed February 1, 2024).
[77] "Help for Consumers," GTA, https://gta.georgia.gov/broadband/lets-connect-georgia/help-consumers.

Consistent with NTIA and Assistant Secretary Davidson's reiterated encouragement of state flexibility and creativity, GTA's intention is to aid as many Georgia residents as possible while ensuring that the scale of the low-cost obligation—and its resulting impact on the business case for ISP applications to build to unserved Georgia locations—is not too burdensome to grant applicants. Nevertheless, the State of Georgia has chosen to prioritize widespread participation among its residents by setting the eligibility requirement at or below 200 percent of the federal poverty line.

Georgia is committed to providing residents with the opportunity to receive low-cost broadband service, while simultaneously recognizing that ISPs have a variety of different plans and may be unable to alter their pricing structure on a large scale. Based on previous experience, it is highly unlikely that ISPs would implement different pricing structures for BEAD-funded areas only, while maintaining other pricing in areas that are not BEAD-funded.

The state thus proposes to require all subgrantees to offer a service option that meets the following criteria:

- A service offering that is set at a price that is affordable to eligible subscribers, defined in the BEAD NOFO as those eligible for the Affordable Connectivity Program or its successor, or those that meet other low-income or federal assistance criteria specified in the NOFO.
- The applicant must submit to GTA a justification on why the service option is affordable to the eligible population, including a market analysis that demonstrates clearly that the service option is reasonably affordable to the average ACP-eligible household. Failure to demonstrate that the low-cost service option is affordable may result in GTA requiring additional information to justify that the service option meets the requirement.
- The price identified, as well as the provisions identified below, for this service option will be a contractual requirement of subawardees for the useful life of the network assets as determined by NTIA.
- This price may be adjusted once a year based on the Consumer Price Index, as outlined by the U.S. Bureau of Labor Statistics.
- Will be available to all households that meet the eligibility requirements of the ACP (available to households with income equal to or below 200 percent of the federal poverty line).

- Allows the end user to apply the ACP subsidy to the service price and encourages ISPs to ensure that prospective customers are aware of their participation in the ACP.
- Meets performance requirements as established by the BEAD program, with download speeds of at least 100 Mbps and upload speeds of at least 20 Mbps.
- Delivers typical latency of no more than 100 milliseconds.
- Is not subject to data caps, surcharges, or usage-based throttling, and is subject only to the same acceptable use policies to which subscribers to all other broadband internet access service plans offered to home subscribers by the participating subgrantee must adhere.
- Allows subscribers to upgrade at no cost in the event the provider later offers a low-cost plan with higher speeds (downstream or upstream).

13.2 Certification

GTA hereby certifies that:

☑ All subgrantees will be required to participate in the Affordable Connectivity Program or any successor program.

14 Middle-class affordability plans

This section describes GTA's middle-class affordability plan designed to ensure that a BEAD-funded network's service area provides high-quality broadband service to all middle-class households at reasonable prices.

GTA will continue to monitor the affordability of available service options within the state and encourage providers to offer a range of options that support broadband adoption by residents regardless of income level and reduce the burden on lower-income subscribers.

Based on the work of digital connectivity researchers and advocates over the past decades, an affordable broadband service can be defined as one whose cost does not exceed 2 percent of household income.[78] Since 2016, the FCC has used the benchmark of 2 percent of a household's disposable income to measure the affordability of voice and broadband service expenditures in its Universal Service Monitoring Report.[79]

This definition has precedent in established thresholds for the affordability of other essential utilities, which have traditionally been set as a percentage of household income based on measures of housing affordability by the Department of Housing and Urban Development (HUD). HUD includes essential utilities (defined as electricity, gas, heating fuel, water, and sewerage services) within its definition of housing cost. Since 1981, public policy has conventionally set the threshold for an affordable housing cost at 30 percent of a household's income;[80] the affordability of individual utility bills is then understood as a subset of that cost.

As noted by the National Academy of Public Administration,[81] the United States Conference of Mayors,[82] and the American Water Works Association,[83] however, considering affordability as a simple percentage of income can disregard differential burdens placed on low-income households. In measuring affordability, GTA will work to monitor the impact of broadband costs

[78] See, for example; "The affordability of ICT services 2022," International Telecommunciation Union, https://www.itu.int/en/ITU-D/Statistics/Documents/publications/prices2022/ITU_Price_Brief_2022.pdf.
[79] See, https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf.
[80] The Brooke Amendment (1969) to the 1968 Housing and Urban Development Act established a rent threshold for public housing of 25 percent of family income, which was raised to 30 percent by 1981. This percentage remains the rent standard for most rental housing programs and has been applied as a "rule of thumb" to owner-occupied housing. Schwartz, Mary and Wilson, Ellen, "Who Can Afford To Live in a Home?: A look at data from the 2006 American Community Survey," U.S. Census Bureau, https://cdn2.hubspot.net/hubfs/4408380/PDF/General-Housing-Homelessness/who-can-afford.pdf.
[81] See, https://napawash.org/uploads/Academy_Studies/NAPA_EPA_FINAL_REPORT_110117.pdf.
[82] See, https://www.awwa.org/Portals/0/AWWA/ETS/Resources/AffordabilityAssessmentTool.pdf.
[83] See, https://www.awwa.org/Portals/0/AWWA/Government/ImprovingtheEvaluationofHouseholdLevelAffordabilityinSDWARulemakingNewApproaches.pdf.

on communities at the highest risk of disconnection, especially given that covered groups in the state are 7.7 percentage points less likely than non-covered groups to subscribe to internet service (of any kind).[84]

Addressing middle-class affordability also requires a definition of middle class. Multiple frameworks exist within established research[85] to accommodate the complexity of the concept, which contains the overlap of factors including income, education, occupation, and geographic location.

Georgia classifies low-income households according to the federal poverty guidelines published by the U.S. Department of Health and Human Services,[86] but does not have an official definition of middle class. Median household income can serve as a useful benchmark for the state in line with the approach to affordability discussed above: according to data from the U.S. Census Bureau, the median household income in Georgia was $65,030 in 2021.[87]

Affordability is more than merely the concern of whether residents can afford service. Rather, affordability in the context of middle-income homes is also inclusive of residents who can afford service in theory, but nonetheless struggle with the financial burden. According to the Current U.S. Population Survey, conducted in the 2021 Census, approximately 5 percent of Georgia residents that do not subscribe to internet service at home reported that the primary reason is that internet service is "not worth the cost."[88] This figure, while not high, highlights the still notable number of Georgia residents that are held back by financial concerns beyond simply being able to afford the service at face value. As such, the broader notion of affordability fundamentally demonstrates the manner in which middle-income households are frequently disincentivized from participating in the digital economy.

A statistically valid survey of residents conducted for the State of Georgia's Digital Connectivity Plan shows the range of prices subscribers in Georgia at various income levels currently pay for

[84] U.S. Census Bureau, American Community Survey Public Use Microdata, 2021. Accessed August 29, 2023.
[85] See, for example, the Pew Charitable Trust Index; https://www.pewtrusts.org/en/research-and-analysis/articles/2023/08/30/is-broadband-affordable-for-middle-class-families.
[86] These guidelines determine eligibility for a variety of federal and state assistance programs, including Medicaid, the Supplemental Nutrition Assistance Program (SNAP), and the Low Income Home Energy Assistance Program (LIHEAP). See: "HHS Poverty Guidelines for 2023," https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.
[87] "QuickFacts: Georgia," U.S. Census Bureau, https://www.census.gov/quickfacts/fact/table/GA,US/INC110221#INC110221.
[88] U.S. Census Bureau, Current Population Survey Public Use Microdata, November 2021. Accessed August 29, 2023.

their internet plan (Figure 14), and the amount they are willing to pay for high-speed, reliable service (Figure 15).

Figure 14: Monthly cost of home internet service by household income

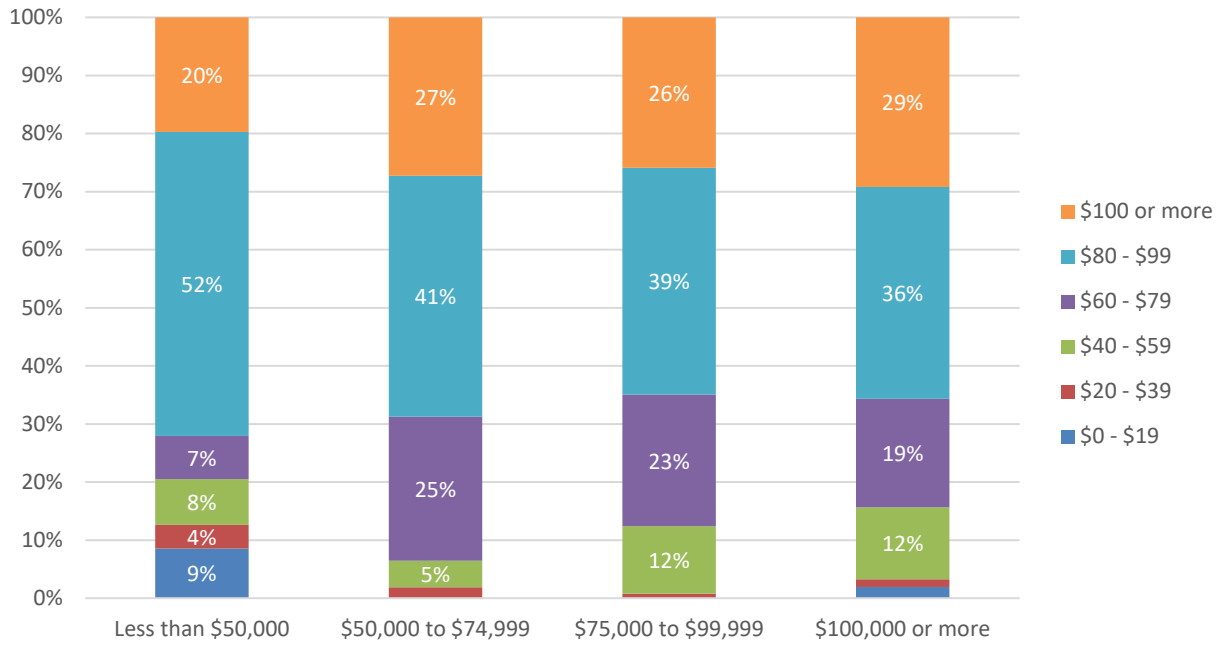
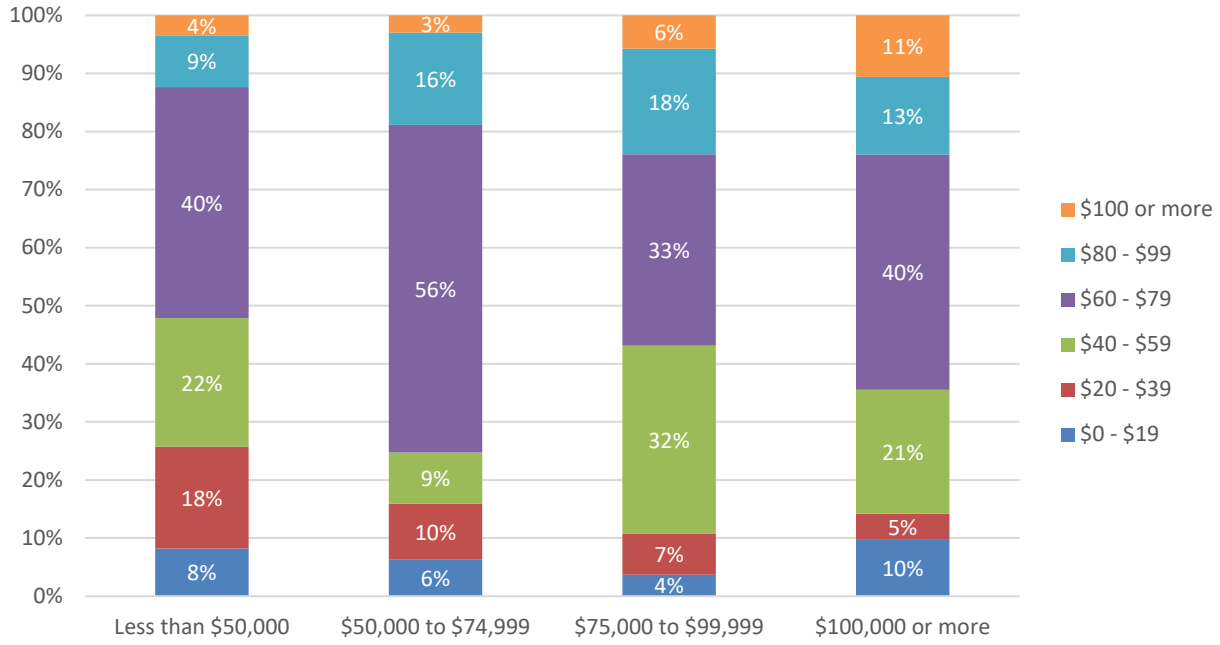


Figure 15: Amount willing to pay for high-speed, reliable home internet service by household income



GTA will encourage providers to offer price points that accommodate subscribers' ability and desire to pay for reliable, high-speed service through a range of solutions, including but not limited to establishing, making publicly available to consumers, and monitoring benchmarks for affordability; providing subsidies for broadband service; encouraging providers to extend low-cost service options to all subscribers; weighting affordability criteria in the scoring of its BEAD grant program; and promoting structural competition through regulations.

To support increased adoption of broadband, the State must ensure residents have access to reliable service. To that end, GTA seeks to effectively address affordability for middle-class subscribers without restricting providers' participation in BEAD—which could lead to higher-cost awards and fewer residents that are served Priority Broadband (i.e., fiber).

Accordingly, GTA plans to manage middle-class affordability within the context of the BEAD program by addressing the following undesired areas of risk:

- **Small, local providers propose low requested BEAD support but set high subscription costs:** GTA will encourage ISPs participating in the State BEAD grant program to offer areas they serve with grant funding their best price for analogous products they offer in other areas, in alignment with the gigabit best offered pricing requirement in the BEAD program rules. (ISPs should include current pricing through the application process and a rigorous financial proficiency test will be built into the letter of credit and other elements of the application process.)

- **Providers shift drop and installation costs to the consumer to recover capital costs:** Grant participation rules will make clear that drops and network equipment are eligible BEAD costs and should be built into grant proposals to avoid inflated subscriber prices. GTA expects this risk to be somewhat mitigated by expanding competition in rural areas from 5G home internet and LEO satellite options.

- **Providers refuse to provide service to expensive locations:** GTA will monitor and ensure that awardees make good on their BEAD service commitments, including not assessing additional fees beyond standard installation fees.

- **Differential pricing between urban and new project areas:** The gigabit best pricing policy mandated in the BEAD program scoring matrix sets requirements around geographic non-discrimination.

The State of Georgia is committed to establishing policies that would ultimately lead to more widespread affordability among middle-income residents. This holistic commitment to expanding the adoption of broadband throughout Georgia necessitates the accommodation and

partnership of subgrantees. In doing so, the State increases the likelihood of ISP participation and, in effect, will provide middle-income Georgia residents a genuine opportunity to be fully engaged in the digital world.

15 Use of 20 percent of funding (Requirement 17)

15.1 Planned use of funds requested

Georgia requests that NTIA obligate 100 percent of the funds remaining of its BEAD allocation (making 2 percent available immediate for programmatic work). Georgia, working closely with its partners from local governments, industry and community organizations, and other stakeholders, will use the funding to begin closing the digital divide as quickly as possible. With 100 percent of the funding obligated, these partners will have the assurance they need to invest appropriate time and resources to participate fully in the State's grant processes. These assurances will allow the State and its partners to move to broadband deployment more efficiently.

NTIA provides that the State may budget its BEAD allocation in four expense categories: Deployment, Non-Deployment, Administrative and Programmatic. Accordingly, Georgia requests 100 percent of its remaining BEAD allocation as follows:

Category	Details	Budget percent	Amount
Deployment Costs	Subgrantee Selection	96%	$1,271,070,083.87
Programmatic Expenses	BEAD Implementation and Monitoring Activities, BEAD Planning Funds	0.76%	$10,000,000
Administrative Expenses	Administrative Cap – (e.g., developing policies and procedures, reporting to NTIA, audits, unfunded grant actions, office capacity)	2%	$26,144,287.43

GTA intends to use funds before the approval of the Final Proposal for the following activities:

- Challenge Process: GTA has selected a contractor to assist GTA with the adjudication of challenges received during the challenge process. The cost is $110,000.
- Subgrantee Selection Process – Application Portal: GTA will select a contractor to provide/build an application portal that will handle the intake of BEAD applications during the Subgrantee Selection Process. The approximate cost is $1,200,000.
- Subgrantee Selection Process – Qualifications: To support the subgrantee selection process as outlined in Georgia's Initial Proposal Volume II, and to ensure applicants meet NTIA's qualification requirements, GTA will contract with a qualified audit firm to review

the qualification information submitted by applicants. The approximate cost is $1,000,000.

- Subgrantee Selection Process – Technical Review: To support the Subgrantee Selection Process, GTA will contract with a qualified engineering firm to consult where necessary on Priority Broadband Applications and provide significant assessment on Non-Priority Broadband Applications. The approximate cost is $1,500,000.
- Final Proposal Preparation: GTA will select a strategy consultant that is needed to assist the State with strategy, coordination, stakeholder engagement, and preparation of the Final Proposal. The approximate cost is $300,000.

15.2 Amount of Initial Proposal funding request

Georgia requests 100 percent of the funds remaining of its BEAD allocation of $1,307,214,371.30 minus the planning grant funds of $4,999,994.65, for a net of $1,302,214,376.65.

15.3 Certification

OPB hereby certifies that:

☑ OPB will adhere to BEAD Program requirements regarding Initial Proposal funds usage.

16 State regulatory approach (Requirement 18)

The purpose of this section is to disclose whether the State will waive all Georgia laws concerning broadband, utility services, or similar subjects that either preclude certain public sector providers from participation in the subgrant process or impose specific requirements and limitations on public sector entities.

Georgia does not restrict public sector providers from providing broadband services and will not limit such providers' participation in the subgrant process or impose specific requirements and limitations on public sector entities. Therefore, a waiver of state law is not applicable.

17 Certification of compliance with BEAD requirements (Requirement 19)

17.1 Certification of compliance

The state hereby certifies that it will:

☑ Comply with all applicable requirements of the BEAD Program, including the reporting requirements.

The State would like to avail subgrantees of the 2 C.F.R. Part 200 exceptions and adjustments NTIA applies in the BEAD program. Should any revisions to this Initial Proposal be needed to accomplish this, the State would like an opportunity to make those revisions. Otherwise, the State will ensure compliance with all applicable 2 C.F.R. Part 200 policy requirements under the assistance listing.

17.2 Subgrantee accountability procedures

17.2.1 Overview

In creating the BEAD program through the Infrastructure Investment and Jobs Act (IIJA), Congress made a once-in-a-lifetime investment in broadband and digital connectivity. The state is committed to ensuring that everyone has access to broadband and the ability to use it meaningfully. The State, in executing the BEAD program, will work diligently to ensure the success of all its recipients' projects that will be designed to ensure that every resident of Georgia has reliable and affordable access to the internet along with the necessary tools and skills that unlock opportunities for educational advancement, economic success, improved health, and strengthened social ties.

The State also takes its role as a steward of federal funding seriously. The State is creating and implementing robust programmatic monitoring, including effective risk-based assessments and active interventions to make sure its subgrantees meet BEAD and the State's goals. The State will actively protect this investment, at a minimum, using the following criteria: risk-based oversight and engagement, distribution of funding on a performance basis, appropriate provisions to claw back funds from subgrantees if needed, timely reporting requirements and robust subgrantee monitoring consistent with statutory requirements, as well as those in 2 C.F.R. Part 200 and the BEAD NOFO.

17.2.2 Risk-based monitoring

The State will establish a manageable approach to its risk-based management that is pragmatic, yet effective. It is in the best interest of the State for subgrantees to successfully complete their projects and offer broadband service to those who need it most. To that end, GTA will review the

organizational, financial, and technical strengths of each subgrantee. Then, it will assign a risk category and appropriate monitoring and technical assistance resources. GTA will monitor individual grants, but it will also monitor the portfolio using program-wide data to ensure early intervention when it finds cross-cutting issues.

17.2.3 Fraud, waste, and abuse

The State will utilize a mechanism to report fraud, waste, and abuse operated by the Office of the Inspector General (OIG).[89] The State will also utilize federal reporting mechanisms such as the U.S. Department of Commerce's Inspector General hotline.[90]

17.2.4 Distribution of funds on a performance basis

Although most federal grants allow grantees and subgrantees to obtain an advanced payment to cover grant-related expenses, the State will indicate clearly in its guidance and through its award documentation that its BEAD subgrants will be issued on a performance-only basis. Using a performance-based method of reimbursement aligns to the December 2023, NTIA policy notice issued by NTIA on the applicability of the Uniform Guidance on the BEAD Program. While further guidance is imminent, the recent updates indicate:

> Consistent with the clarification provided by the Department of the Treasury in its recent guidance regarding broadband infrastructure projects funded by the State and Local Fiscal Recovery Funds and Capital Projects Fund, NTIA clarifies that Eligible Entities may elect to treat subawards as fixed amount subawards even if the Eligible Entity requires subrecipients to submit evidence of costs. Eligible Entities thus may treat subawards providing for a maximum payment amount that is based on a reasonable estimate of actual cost (see 2 CFR 200.201(b)(1)) as fixed amount subawards, even if the subaward agreement also provides that payments to the subrecipient will be limited to actual costs after review of evidence of costs….Subrecipients that receive fixed amount subawards pursuant to this Policy Notice are not required to comply with the cost principles under the Uniform Guidance.

As such, the State will utilize a fixed subaward structure with a performance-based method of repayment similar to its SLFRF and CPF repayment. Subrecipients under this fixed amount subaward are not required to comply with the cost principles under the Uniform Guidance pursuant to NTIA's policy update. Awardees will be able to receive a minimum of 10% percent of

[89] "Reporting Fraud, Waste, and Abuse within the Executive Branch," OIG, https://oig.georgia.gov/report-fraud-waste-abuse. See also, "Other Investigative Agencies," OIG, https://oig.georgia.gov/other-investigative-agencies.
[90] "Report Fraud, Waste, Abuse, & Whistleblower Reprisal," Office of the Inspector General, U.S. Department of Commerce, https://www.oig.doc.gov/Pages/Hotline.aspx.

the awarded funds without having any passed locations. Subsequently, the performance-based milestones will require a certain number of locations passed to receive additional funding.

OPB will require the following from subgrantees before dispersing BEAD funds:

- Reaching grant milestones
    - OPB will require the timely reporting of the completion of grant milestones, as outlined below according to the plan outlined in Section 5 (Requirement 8).
- Providing compliant documentation
    - OPB will require subgrantees to support a request for reimbursement through a certification and a submittal of as-builts and GIS location data, which will be verified according to procedures outlined in the contracting documents. GTA will ensure that it has a right to access documents and physical assets in a manner similar to that employed by the federal government in broadband grant programs (the method of repayment is contingent upon further policy guidance and subject to any change based on federal program updates). An example of how the State collected this request under SLFRF and CPF Broadband Infrastructure fixed awards can be found here: https://opb.georgia.gov/document/document/broadband-infrastructure-and-capital-projects-fund-payment-request-template/download.

17.2.5 Clawback provisions

OPB will work with its legal counsel to ensure its grant awards contain claw back provisions. In other words, if the subgrantee fails to meet its obligations under the award, including those provided in the application, the state can deny a reimbursement/payment request, require partial or full forfeiture of BEAD funds, or issue financial penalties for fraud, misconduct, or non-performance. For its purposes, the state considers non-performance to be a failure to deploy broadband in an effective and timely manner, failure to continue to offer low-cost service options for the useful life of the assets, failure to meet reporting deadlines, failure to provide accurate deployment data, or failure to fulfill any or all additional BEAD requirements such as broadband speeds.

17.2.6 Timely reporting requirements

Building on its existing broadband funding and grantmaking experience, the State will require subgrantees to report on their awards on a timely basis. GTA will use these reports and check-ins to identify and mitigate risks to ensure both the State's and subgrantees' compliance with statutory, 2 C.F.R. Part 200, and BEAD requirements. These reports include:

- Quarterly check-ins with OPB/GTA to discuss the project progress.

- Quarterly reporting on project progress and fiscal performance.
- Responses to intermittent requests from OPB/GTA about the project.
- On-site inspections.

17.2.7 Robust subgrantee monitoring

The State will use various monitoring activities that produce data about subgrantee performance and progress to assess individual and portfolio risks and inform decisions about targeting technical assistance, corrective action or enforcement actions as needed. Such activities include:

- Desk reviews – periodic review of subgrantees' progress and financial reports designed to ensure that OPB's own reports to NTIA contain timely information.
- Field engineering reviews or audits – engineering teams evaluate constructed segments and full projects against as-built reporting and application requirements.
- Site visits – periodic visits using a standardized agenda to capture first-hand observations of recipient performance along various dimensions, including subgrantee capacity, performance validation, safety practices, and employment practices.

In reviewing its portfolio, the State will establish and update monitoring levels for its projects based on factors including performance reporting, desk reviews, and OPB/GTA interactions.

17.3 Certification of nondiscrimination and civil rights

The state hereby certifies that it will, in its selection of subgrantees, account for:

☑ Parts II and III of Executive Order 11246, Equal Employment Opportunity

☑ Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency

☑ Executive Order 13798, Promoting Free Speech and Religious Liberty

Additionally, prior to distributing any BEAD funding to a subgrantee, GTA will require the subgrantee to agree, by contract or other binding commitment (to be determined by counsel), to abide by the non-discrimination requirements set forth in the following legal authorities, to the extent applicable, and to acknowledge that failure to do so may result in cancellation of any award and/or recoupment of funds already disbursed:

☑ Title VI of the Civil Rights Act

☑ Title IX of the Education Amendments of 1972

☑ The Americans with Disabilities Act of 1990

☑ Section 504 of the Rehabilitation Act of 1973

☑ The Age Discrimination Act of 1975

☑ Any other applicable non-discrimination law(s)

17.4 Certification of cybersecurity and supply chain risk management

The State certifies that it will ensure subgrantee compliance with the cybersecurity requirements of the BEAD NOFO to require prospective subgrantees to attest that:

☑ The prospective subgrantee has a cybersecurity risk management plan (hereafter in this list, "the plan") in place that is either: (a) operational, if the prospective subgrantee is providing service prior to the award of the grant; or (b) ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award.

☑ The plan reflects the latest version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity (currently Version 1.1) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented.

☑ The plan will be reevaluated and updated on an annual basis.

☑ The plan will be submitted to the State prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to GTA within 30 days.

The State further certifies that it will ensure subgrantee compliance with the supply chain risk management (SCRM) requirements of the BEAD NOFO to require prospective subgrantees to attest that:

☑ The prospective subgrantee has a SCRM plan (hereafter in this list, "the plan") in place that is either: (a) operational, if the prospective subgrantee is already providing service at the time of the grant; or (b) ready to be operationalized, if the prospective subgrantee is not yet providing service at the time of grant award.

☑ The plan is based upon the key practices discussed in the NIST publication NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain

Risk Management Practices for Systems and Organizations and specifies the supply chain risk management controls being implemented.

☑ The plan will be reevaluated and updated on an annual basis.

☑ The plan will be submitted to the State prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to GTA within 30 days. The State will provide a subgrantee's plan to NTIA upon NTIA's request.

The State will ensure that, to the extent a BEAD subgrantee relies in whole or in part on network facilities owned or operated by a third party, it will obtain the above attestations from its network provider with respect to cybersecurity practices and supply chain risk management practices.

GTA maintains security policies which will be developed to support the State's efforts to ensure subgrantee compliance with these requirements.[91] Georgia is also a cybersecurity business and research hub.[92]

[91] "All Security Policies," GTA, https://gta-psg.georgia.gov/all-security-policies.
[92] "Cybersecurity," Georgia Department of Economic Development, https://www.georgia.org/industries/technology/cybersecurity.

18 Public comment process

This section describes the public comment period conducted for the Initial Proposal Volume II and provides a high-level summary of the comments received as well as how they were addressed by GTA.

GTA made Volume II available for public comment for a period of 30 days ending on December 1, 2023, to gather feedback from stakeholders and promote transparency in the development of the Proposal. GTA conducted a separate comment period for the Initial Proposal Volume I, which is described in that volume, following the same process.

A draft of Volume II was posted publicly on GTA's website with a description of its role in the BEAD program and an invitation to submit comments on the content by filling out an online form. This inbox was monitored by GTA for the duration of the comment period. (Screen captures of the posting on GTA's website are included in Appendix J.)

To encourage broad awareness, participation, and feedback during the public comment period, GTA conducted outreach and engagement activities to solicit participation by a diverse range of stakeholders. GTA also hosted a public comment webinar on November 8, 2023, which was recorded and posted on GTA's website along with the draft Proposal.

At a high level, comments received addressed a myriad of themes, including, but not limited to, the addition of more procedural clarity, the easing of qualification requirements, loosening of restrictions and requirements more broadly, and the streamlining of local processes. Some industry stakeholders urged GTA to modify its county-level project area requirement in favor of allowing applicants to determine their own project areas. Based on NTIA and the State's strong preference for defined project areas, GTA has chosen to move forward with its initial plan for defined project areas at the county-level. Likewise, many industry stakeholders requested that GTA use both wireless and fiber technologies to maximize coverage of unserved and underserved locations—comments often accompanied by the recommendation for a lower EHCPLT. Regarding scoring criterion, several stakeholders requested additional sub-criteria and a higher degree of specificity in how scoring will be judged. These comments also often encouraged a different distribution of points: including more to affordability, minimum outlay, speed to deployment, and higher-speed wireless, among others. Additionally, some industry stakeholders urged GTA to adjust the letter of credit requirement. These comments suggested a wide range of modifications, such as the adoption of the NTIA waiver or seeking alternatives to the letter of credit akin to Virginia or Ohio.

GTA carefully considered the feedback it received from a variety of stakeholders to inform this Proposal. The comments received, as well as the State's responses to those comments, are documented in the Local Coordination Tracker Tool.

Based on the feedback received, the State incorporated many suggested changes in the submitted Initial Proposal Volume II. Some of these include allowing for partnership applications to address concerns with County Project Areas, additional flexibility in qualification requirements, updated scoring criteria and point allocations along with additional clarity around scoring, and a limited waiver for NTIA's letter of credit requirement.

Additionally, GTA will continue to take this input into account as it implements the Challenge Process and develops the Final Proposal and will conduct ongoing communications to inform and engage the public through this process.

Appendix A: Local coordination tracker tool

See attached “AL_Local_Coordination_Documentation_Tracker.xlsx”.

Appendix B: Asset inventory data – digital connectivity assets

The following table details entities that have digital connectivity assets including digital literacy and workforce development programs.

Table 15: Digital connectivity assets

Asset name	Description
4-H Tech Changemakers	The 4-H Tech Changemakers project uses an adult-youth partnership model to empower teens as teachers of digital literacy in areas lacking broadband internet access. Georgia 4-H Tech Changemakers held 91 hands-on classes, workshops, and trainings led by 88 trained 4-H'ers from 15 counties during the 2021-22 grant cycle. The most popular topics included responsible online behavior, email communication, online safety tips and video conference communication. Partners include Microsoft and UGA Extension.[93]
Accelerate: Atlanta	Accelerate: Atlanta brings together civic, learning, and corporate partners to provide skills across the spectrum of digital proficiency to build a more inclusive workforce for all. The program empowers underserved communities to close the digital divide in the growing workforce. It provides digital skills to promote economic uplift for Atlanta's populations with the highest susceptibility to automation and the lasting impact of Covid-19. Digital fluency will ensure that they can keep up with advances in AI and machine learning.
Albany State University – Connecting Minority Communities programs	Albany State University received a $2.9 million Connecting Minority Communities grant in 2022 from NTIA to address the growing demand for broadband connectivity in the Albany community while establishing a foundation for future distance learning at the University.[94]
Athens Community Council on Aging	Digital skills, education, workforce, and OATS training programs for older adults in addition to basic social services.
Atlanta Housing Authority – Achieving Connectivity to Create Equity and Self Sufficiency (ACCESS)	This Housing Authority of the City of Atlanta program connects those in need to training from private partners.[95]

[93] "Digital Ambassadors," Georgia 4-H, https://georgia4h.org/programs/focus-areas/agriculture-stem/science-technology-engineering-math/digital-ambassadors/.
[94] NTIA, "Biden Administration Announces More Than $2.9 Million in Internet for All Grant to Albany State University," Internet For All, November 22, 2022, https://ntia.gov/press-release/2022/biden-administration-announces-more-29-million-internet-all-grant-albany-state.
[95] "Digital Inclusion," Atlanta Housing, https://www.atlantahousing.org/digitalinclusion/.

Asset name	Description
Atlanta Housing Authority – Digital Leadership Academy	This free education and certification program teaches high-demand technology skills, greatly increasing the employability of each graduate in the information technology sector. This 16-week pilot program launched in February 2021 and provides students with the devices and connectivity needed to create a fully immersive educational experience. Partners include TechBridge, Diversity Cyber Council, Braintrust, WrightNow Solutions, and Generation USA.
Atlanta Technical College "Connecting Minority Communities Pilot Program"	The College received a $3 million award from NTIA in 2023 through the Connecting Minority Communities Pilot Program to improve its broadband infrastructure, increase the number of devices available to students through its lending program, and offer digital skills training for senior citizens in the community through its Continuing Education Division.
Carroll County Schools – Device programs	Provides desktop computers, laptops, or tablets and technical support, as well as supporting online accessibility and inclusivity for students who lack devices. The budget is under $25,000 and over 100 people were served in 2022, with a target of 101-250 people over the life of the project.
Clark Atlanta University	The University offers a STEM enrichment program in partnership with Verizon Wireless' Verizon Innovative Learning initiative.[96]
Clayton County – Office of Digital Equity County Digital Equity and Broadband Strategic Plan	Clayton County (population: 297,100; 18.9 percent of population in poverty)[97] has an Office of Digital Equity[98] and has created a Broadband and Digital Equity Plan. The Office helps county residents access the ACP and offers digital literacy training.
Clayton County Public Library – various programs	Provides access to Wi-Fi and devices, with PCs available at branches and devices available for checkout. The Library's Bookmobile is outfitted with Wi-Fi. Offers one-on-one technical help for residents to learn how to use devices and software The Library provides hotspot devices for use with patron's personal devices.
Clayton County Public Schools	Through a remote “extending learning beyond the classroom” program, schools support college and career preparation.
Clayton County Senior Services – Adult literacy	Provides computer tablets for seniors' home use.
Clayton County – various programs	Clayton County offers several programs through its community institutions, as detailed in its Digital Equity and Broadband Strategic

[96] “STEM enrichment program at Clark Atlanta lights the way,” Verizon press release, October 5, 2021, https://www.verizon.com/about/news/stem-enrichment-program-clark-atlanta.
[97] U.S. Census, “QuickFacts: Clayton County, Georgia,” https://www.census.gov/quickfacts/claytoncountygeorgia.
[98] “Clayton County’s Digital Equity Initiative,” Clayton County, https://digitalequity.claytoncountyga.gov/.

Asset name	Description
	Plan. The Clayton County Public Library offers technical assistance for devices and software, access to Wi-Fi and devices, a Bookmobile with Wi-Fi, and hotspot borrowing. Clayton County Public Schools extend learning beyond the classroom through college and career preparation. Clayton County Senior Services supports adult literacy by offering computer tablets for seniors' home use.
Cobb County Libraries – Digital Literacy Workshops	Offer Digital Literacy Workshops sponsored by AT&T on a variety of topics including cybersecurity, internet basics, and classes in software and on using devices.
Columbus Technical College – Adult Education Northstar Digital Literacy	The College provides digital literacy training, desktop computers, laptops, and tablets and technical support for adult education students obtaining a high school diploma/equivalency. The nearly $25,000 budget is funded by the office of Adult Education. The program serves Muscogee, Talbot, Stewart, Quitman, Harris, and Chattahoochee counties. With over 100 people served in 2022, the target is to serve over 500 people over the life of the project.
Columbus Technical College – Student Laptop Loan Program	This program provides desktop computers, laptops, and tablets and technical support for individuals with disabilities and students at Columbus Technical College. It serves Muscogee, Talbot, Stewart, Quitman, Harris, and Chattahoochee counties. Over 100 people were served in 2022, with a target to serve over 500 people over the life of the project.
Comcast Lift Zones – various locations throughout the state	21 Comcast Lift Zones located throughout the state combine 1 Gbps connectivity to community centers with digital connectivity programming, available to users at the following sites:[99] • Las Plaza Americas • Girls Inc • Raising Expectations Inc, Washington Learning Pod • Boys & Girls Club Saint Simons Island • Boys & Girls Club SE Georgia – Glynn Villa • Boys & Girls Club SE Georgia – Terry Thomas Club • Finish Strong Learning Pod Lift Zone at Siloam Church International • Inspiredu • Flint River Community Center Boys & Girls Club in Riverdale • Urban League of Great Atlanta – At Promise Youth Center • Gathering Place Community Center • Boys & Girls Club, E.W. Hagler Club in Augusta

[99] "Lift Zones," Comcast, https://corporate.comcast.com/impact/digital-equity/lift-zones.

Asset name	Description
	• Boys & Girls Club, Dogwood Terrace Club in Augusta • Boys & Girls Club, McDuffie County Club in Thomson • Paralyzed Veterans of America SE Chapter at Hephzibah • Frank Callen Boys and Girls Club Savannah, GA • Lost-N-Found Youth Center • Mercy Housing • Hosea Helps • Center for Pan Asian Community Services
Communications Workers of America (CWA)	CWA offers courses for its members in telecommunications, cabling, and related fields through CWA's National Education and Training Trust and other educational partners.
Compudopt Atlanta – Digital inclusion and devices	Programs serve to eliminate limited access to computers, facilitate growth in technical and digital literacy skills, help provide no- or low-cost high-speed internet options, and support the future of youth and their communities.
Designstyles & Co, Dream Center	Business incubator in Morrow, GA, designed with space amenities and resources that allow young people and adults in underserved communities. Provides youth programs and OATS digital skills training for adults 50 and over.
Divine Reach Education and Counsel	Adult literacy and other programs for youth and adults. Provides OATS programs for seniors.
Dodge County – Digital connectivity	The County is developing a digital connectivity program for broadband access and technical support.
Evans County Charter School System – Wi-Fi on the Go	Supports internet availability and affordability by providing parents of students and school employees with a hotspot and unlimited data for $50 per month.[100]
Forsyth County Senior Services	Various programs for seniors. Provides OATS programs for digital inclusion.
Fort Gaines, City of – accessible online content	Develops and distributes accessible online content directed at populations with specific needs, such as seniors, low-income residents, those with low-literacy, and those whose first language is not English.
Fort Valley State University (FVSU) "Communi-versity: Piloting an Ecosystem for Digital Equity"	With a $3 million Connecting Minority Communities grant received in 2023 from NTIA, FVSU will work with community organizations to expand broadband connectivity and provide digital skills training for students and residents in Peach County, including establishing local "broadband hubs" staffed with TechNavigators.

[100] "Wi-Fi on the Go," Evans County Charter School System, https://www.evans.k12.ga.us/article/506223.

Asset name	Description
Emory University School of Medicine – telehealth	The Emory University School of Medicine offers support through access to telehealth. This planned effort will include programs addressing digital navigators, broadband access, and creating accessible and inclusive internet content. Key components include: 1) access to health information, 2) telehealth and remote healthcare, 3) online health support communities, and 4) health tracking and remote patient monitoring. The program will also include remote education and training for healthcare professionals, and health promotion and preventive measures.
Empower Southwest Georgia – American Connection Corp. Fellow to support ACP	The Fellow will support applicants to the Affordable Connectivity Program (ACP), conduct a leadership forum, organize workshops for builders and construction leadership for broadband, serve as a public advocate, educate consumers on broadband access, host learning sessions, and assist local elected officials with planning and processing permits and educating voters. The Fellow will also work to establish a similar group with the county administrators in the region.
Empower Southwest Georgia – broadband community outreach	The organization applied to American Connection Corp. (ACC) for a $150,000 grant to develop paid staff consisting of three people—an intern, a manager, and a field director—to conduct community organizing and community outreach including for broadband. It also submitted a Host Organization application to ACC for an ACC Fellow.
Empower Southwest Georgia – various programs	This nonprofit organization provides many services to its area's constituents, including supporting applicants for the ACP, hosting Leadership Forums for ISPs and community members, broadband workforce development, and educating consumers about internet subsidies and plans for the community.
Fulton County Schools – Student-focused Learning Plan	The U.S. Department of Education (U.S. DOE) Digital Equity & Opportunity vision[101] includes providing devices to students, teaching digital literacy, and creating an open education ecosystem populated by instructional materials that are not subject to copyright laws, proprietary systems, or other access barriers. Now supported by the U.S. DOE, Fulton County Schools, serving approximately 96,000 students, has since 2014 been continuously developing a "Student-focused Learning"[102] program that includes providing digital devices to every student, subject to a Readiness Assessment.
Gainesville City Schools –	Provide desktop computers, laptops, or tablets and technical support for individuals with a language barrier, including individuals

[101] "Priorities," U.S. Department of Education Office of Educational Technology, https://tech.ed.gov/priorities/.
[102] "Student Focused Learning," Fulton County Schools, https://www.fultonschools.org/studentfocusedlearning.

Asset name	Description
Chromebooks for Students	who are English learners and/or have low levels of literacy. The school system also provides families with information about the ACP. With a budget of over $500,000, the program served 100 people in 2022 and has a target to serve over 500 people over the life of the project.
Georgia Center of Innovation – telehealth programs	The Georgia Center of Innovation helps startups in telehealth and related areas to increase innovation.[103]
Georgia Department of Corrections (GDC) – various programs	GDC provides digital skills and literacy training, data privacy and cybersecurity instruction, devices (laptops, computers, tablets), and broadband access to incarcerated individuals in state prisons. It provides training for teachers of broadband skills and digital literacy, as well as developing and distributing accessible content directed at populations with specific needs.
Georgia Department of Corrections – Washington State Prison	At the Washington State Prison, GDC provides cybersecurity training and training, equipment, subsidized services, or other resources to facilitate access to telehealth and telemedicine services. It also trains teachers of broadband skills and digital literacy and provides hotspots and free or subsidized internet access.
Georgia Department of Education – GeorgiaStandards.Org (GSO)[104]	GaDOE maintains a free, public website delivering access to Georgia's educational standards, including standards for digital literacy for school-age children.[105]
Georgia Department of Education – various programs	GaDOE provides support for the ACP, devices, hotspots, digital skills and digital literacy training, and digital accessibility to its clients. GaDOE also provides funding to support programs that provide broadband infrastructure, devices, and/or subsidies to support broadband affordability. In addition, GaDOE has 17 career clusters that provide paths for districts to use with their students. In 2021, the Department also established an Office of Rural Education and Innovation, which will work with low-wealth school districts in high poverty/distressed regions of Georgia to tackle barriers that impact academic outcomes and opportunities for students—including lack of broadband access.[106]

[103] Center of Innovation, "Digital Health Support & Training in Georgia," https://www.georgia.org/center-of-innovation/areas-of-expertise/information-technology/digital-health.
[104] "Georgia Standards of Excellence," Georgia Department of Education, https://www.georgiastandards.org/.
[105] Georgia Department of Education, "K-5 Digital Literacy," https://www.georgiastandards.org/Georgia-Standards/Pages/ELA-K-5-Webinar-Digital-Literacy.aspx; Georgia Department of Education, "6-12 Digital Literacy," https://www.georgiastandards.org/Georgia-Standards/Pages/ELA-6-12-Webinar-Digital-Literacy.aspx.
[106] "Rural Education and Innovation," GaDOE, https://www.gadoe.org/rural.

Asset name	Description
Georgia Hispanic Chamber of Commerce – various programs	The Chamber promotes and supports the domestic and international economic development of Hispanic businesses and individuals and serves as a link between non-Hispanic entities and the Hispanic market.[107] It offers numerous relevant programs including "CRECER para mujeres" (growth for women), a program to support small businesses owned by women.[108]
Georgia Library Service for the Blind and Print Disabled – various programs	Georgia Library Service for the Blind and Print Disabled (GLS) [formerly Georgia Libraries for Accessible Statewide Services – GLASS] promotes the use of assistive technology and accessible reading materials for those who are blind or whose physical abilities require the use of books and magazines in audio format or in braille.
Georgia Public Library Service – Digital connectivity in Georgia	The Georgia Public Library Service offers statewide programs to address internet availability and affordability, as well as providing digital literacy, data privacy and cybersecurity, and online accessibility and inclusivity programs. With a budget of under $25,000, it served over 100 people in 2022 and has a target of serving over 500 people over the life of the project.
Georgia State University – Digital Learners to Leaders (DLL) program	Provides professional development opportunities to Georgia State students seeking both four-year and two-year degrees, including those at Perimeter College.[109]
Gilmer County Board of Education – Chromebook 1-to-1 program	Provides desktop computers, laptops, or tablets and technical support, and has a budget of between $100,000 and $249,999.
Global Partnership for Telehealth (GPT)	Georgia is home to one of the largest nonprofit telehealth networks in the U.S. Founded in 2007 as the Georgia Partnership for Telehealth, GPT initially managed a statewide telehealth network initiated through grant funding in 2004 with the goal of improving underserved communities' access to healthcare services. GPT has since grown to support clinical and nonclinical sites in 10 states as well as international projects through its telehealth platform Pathways, training, and other services. The organization facilitates roughly 40,000 telehealth engagements per year.[110]

[107] GHCC, "About GHCC," https://ghcc.org/en/about-ghcc/.
[108] GHCC, "CRECER para Mujeres," https://ghcc.org/en/crecer-para-mujeres/; translated page at https://ghcc-org.translate.goog/en/crecer-para-mujeres/?_x_tr_sl=auto&_x_tr_tl=en&_x_tr_hl=en.
[109] "Digital Learners to Leaders Internship Course," GSU Technology, https://technology.gsu.edu/technology-services/technology-professional-training/digital-learners-to-leaders-program/.
[110] Global Partnership for Telehealth, https://gpth.org/.

Asset name	Description
Goodwill of North Georgia – Goodwill Career Accelerator and South DeKalb Career Center	Goodwill of North Georgia supports internet availability and affordability by providing digital literacy training; desktop computers, laptops, or tablets; and technical support. The program serves all covered populations except seniors. It has a budget of between $250,000 and $499,999 and served over 100 people in 2022, with a target of serving more than 500 people over the life of the project.
Inspiredu – Learning Spark Initiative	Inspiredu is an Atlanta-based empowerment organization whose offerings include digital literacy programs. It drives digital connectivity and literacy for Georgia families, communities, and schools. The Learning Spark Initiative partners with Georgia schools to facilitate interactive workshops that leverage technology to help families responsibly access and utilize digital tools for learning. This program also helps families learn about and apply for internet subsidies like the ACP. The program provides digital literacy support; desktop computers, laptops, or tablets; and technical support for individuals who primarily reside in a rural area, members of a racial or ethnic minority group, and individuals who live in a covered household (i.e., household income is below 150 percent of the poverty level).
Institute for the Development of Freedom of Information (IDFI) – Digital rights and digital literacy	On November 16, 2022, IDFI and the research institute Gnomon Wise held a training on digital rights and digital literacy at the University of Georgia.
Integrity Transformations Community Development Corporation (CDC) – Digital Skills Development	Atlanta-based Integrity CDC's Digital Skills Development class is an entry-level course designed to introduce users to basic computer principles. This basic course requires little to no previous experience. The class provides basic information technology (IT) literacy and ensures one understands the different terminology and the functionality of the basic Microsoft Office Suite. Students learn how to access the software and their documents from a desktop, laptop, or their personal phone.
Latin American Association (LAA) – Latino Digital Equity Centers Program	The Latino Digital Equity Centers Program provides ESL, digital literacy, digital skills, and workforce development programs to Latino communities. LAA also offers courses and workshops for girls and young women through the Tech4Girls program, designed to encourage the pursuit of careers in STEM and provide female entrepreneurs with digital skills to grow their businesses.[111]

[111] "Computer Classes," Latin American Association, https://thelaa.org/computer-literacy-classes/.

Asset name	Description
Legacy Harvest Foundation	Equips communities across Georgia with the financial resources, economic development, and career coaching they need to break down barriers of opportunity. Provides Digital Skills @ 50+ AARP Foundation, in collaboration with Older Adults Technology Services (OATS), Step Into Your Future (SIYF)-Youth Program (16-24 Year Olds), and workforce apprenticeship programs.
Literacy Action	Based in Atlanta, digital literacy skills and other literacy skills and workforce training. The Success Center located in Peachtree Plaza is a digitally focused, student-centric adult literacy campus. Provides OATS programs for digital inclusion.
Macon Housing Authority – Computer Classes	This citywide program, which addresses internet availability and affordability, digital literacy, data privacy and cybersecurity, has a budget of under $25,000. It served 25 people in 2022, with a target to serve 500 people over the life of project.
Macon-Bibb Mayor's Literacy Alliance	Program helps increase the graduation rate, decrease the drop-out rate, and lower the adult illiteracy rate by 50 percent over the next 10 years.
Morehouse College – tablets for students program	In a partnership with Microsoft for the 2020-2021 academic year, Morehouse College, a historically black college or university (HBCU), provided newly enrolled students with Microsoft Surface 2-in-1 tablets.
Morehouse School of Medicine (MSM) – "From Survivor to Innovator: Digital Health Equity and Community Impact"	MSM received a $4.2 million Connecting Minority Communities grant in 2023 from NTIA to understand the impact increasing technological access and literacy will have on digital health equity. The overall goal of this project is to lead and advance digital health equity.[112]
Northstar Digital Literacy	Northstar Digital Literacy is a program that defines the basic skills needed to use a computer and the internet in daily life, employment, and higher education. Northstar Digital Skills classes are offered both in-person and online. There are over 75 Northstar locations across the state: • 100 Black of Men of Atlanta Inc. • Albany Technical College • Albany Career Center • Athens Technical College Adult Education Program • Atlanta Public Schools Atlanta WorkSource Georgia, Adult Education Center

[112] NTIA, "Biden-Harris Administration Announces More Than $175 Million in Internet for All Grants to 61 Minority-Serving Colleges and Universities," Internet For All, February 23, 2023, https://www.internetforall.gov/news-media/biden-harris-administration-announces-more-175-million-internet-all-grants-61-minority.

Asset name	Description
	• Augusta Technical College • Catholic Charities Chamblee Office • Center for Pan Asian Community Services • Central Georgia Technical College Bibb, Baldwin, Houston • Chattanooga Goodwill – Mack Gaston Community Center • Chattahoochee Technical College – North Metro, Canton • Clayton County Adult Education • Coastal Pines Technical College • Cobb County Adult Education Center • DigitalCrafts • Georgia Piedmont Technical College – DeKalb, Newton, Starnes, South DeKalb • GNTC – Gordon County Adult Education, Whitfield Murray Adult Education, Floyd County Adult Education • Goodwill of North Georgia – Career centers as Smyrna, Old National, Stockbridge, Decatur, Woodstock, East Athens, Oakwood, Cornelia, Rome, Cartersville, Dawsonville • International Rescue Committee • Lanier Tech – Hall County, Wimberly Center (Barrow County) • Literacy Action • Midtown Career Center, Midtown Training Center • Newnan Career Center • North Georgia Technical College – East, West • Oconee Fall Line Technical College – North, South • Ogeechee Technical College • Opportunity Center at Goodwill SEGA • LaGrange Career Center • Savannah Technical College-Army Education Center, Effingham, White Bluff • South Georgia Technical College • Southeastern Technical College • Southern Regional Technical College – Thomasville • Thomas Crossroads Training Center • Valdosta Career Center, Valdosta Training Center • West Georgia Technical College Coweta, Douglas, Murphy, Troup • Wiregrass Georgia Technical College – Valdosta, Coffee, Ben Hill- Irwin
Northwest Georgia Housing Authority,	The Housing Authority is developing a digital connectivity program and wants to expand to provide programs for digital skills and

Asset name	Description
Rome GA – Digital connectivity	literacy, devices (laptops, computers, tablets), Digital Navigators, and broadband access.
Northwest Georgia Housing Authority, Rome GA – Digital Skills +50	This citywide digital literacy program for residents over 50 has a budget of under $25,000. It served under 25 people in 2022, with a target of over 50 people for the life of project.
PCs for People – Devices and internet access	This Atlanta-based national nonprofit social enterprise works to get low-cost quality computers and internet into the homes of individuals, families, and nonprofits with low income.
Piedmont Regional Library System – Computer training and technology checkout	The Piedmont Regional Library System offers computer training and device checkout at all 10 libraries in the regional system. Its programs address digital literacy, device access, and online accessibility and inclusivity. The system provides computer training and technology checkout in all 10 libraries in the regional system. Programs address digital literacy; desktop computers, laptops, or tablets and technical support; and online accessibility and inclusivity. With a budget of under $25,000, it served over 100 people in 2022.
Savannah Public School System – various programs	Through various Countywide programs, schools provide desktop computers, laptops, or tablets and technical support; and address digital literacy, data privacy and cybersecurity, and online accessibility and inclusivity. The budget is over $500,000, and programs offered to parents are free. Over 100 people were served in 2022, with a target of over 500 people over the life of the project.
Technical College System of Georgia (TCSG) – technical training certification and other programs	Fiber optic technical training certification curricula has been developed and learning programs are available through the 22 TCSG schools throughout the state.
Technology Association of Georgia Education (TAG-Ed) – digital workforce development	TAG-Ed provides professional development and workforce development programs statewide.
Twin Oaks Elementary School – Device programs	Offers loans or donations of devices (i.e., computers, tablets) to access the internet, and trains teachers of broadband skills and digital literacy.
University of Georgia Cooperative Extension – various programs	UGA Extension provides a wide range of programs for youth development, families, and those living in rural areas. The Extension began offering select programming virtually during the Covid-19 pandemic and continues to host online classes available to

Asset name	Description
	participants statewide and nationally.[113] It is also a partner in the 4-H Tech Changemakers program.
Urban League of Greater Atlanta – computer training	The Urban League provides computer training and workforce development programs.[114]
Westside Works – Digital skills	Westside Works is a neighborhood-based workforce collaborative looking to transform the Westside community and Greater Metro Atlanta through increased digital skills development.
Wheeler County School District – Hotspots and laptops	Offers hotspots for families and devices for students as needed. The countywide program has a budget of between $50,000 and $99,999. It served up to 100 people in 2022 and is targeted to serve up to 500 people.

[113] Joshua Paine and Maria Lameiras, "Extension sees high demand for digital delivery," University of Georgia news release, June 4, 2020, https://news.uga.edu/extension-high-demand-online-programs/.
[114] "Computer Training," Urban League of Greater Atlanta, https://ulgatl.org/computer-training/.

Appendix C: Stakeholder survey instruments

The state published targeted stakeholder surveys in conjunction with the stakeholder outreach efforts and continued to promote the surveys and encourage stakeholders to submit responses for an extended time during preparation of this Plan. The surveys aligned with the key categories identified in the Plan and included a focus on digital connectivity issues (i.e., “digital equity” in the IIJA’s parlance). The surveys were:

1. Workforce development – what organizations are doing to provide or facilitate training for jobs in broadband-related fields.

2. Digital connectivity programs – organizations’ and local governments’ digital connectivity programs, plans, and coalitions to provide community members skills and tools for participating in broadband-related opportunities.

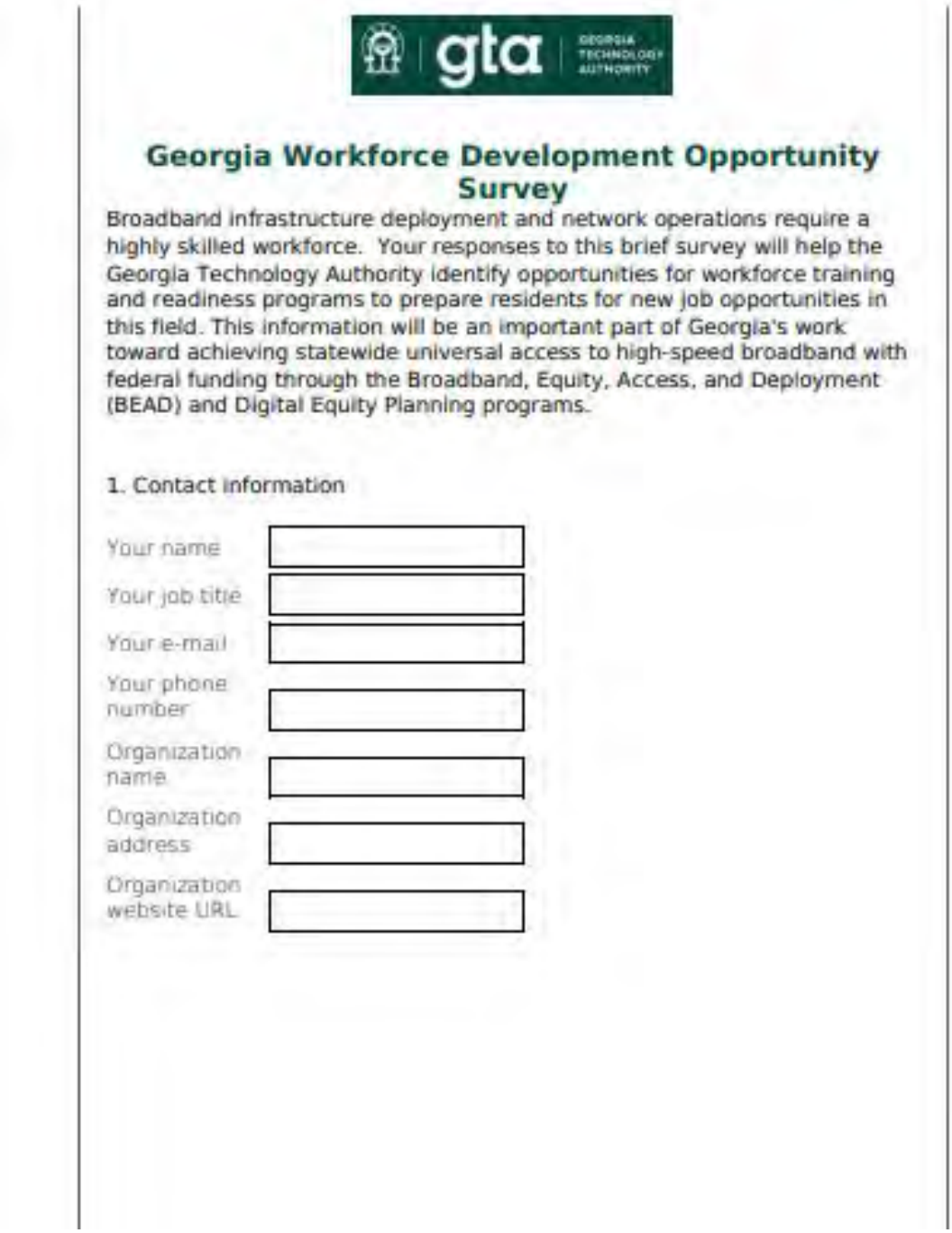
3. Community anchor institutions – what community institutions/organizations are doing to advance Georgians' opportunities to use broadband to work, learn, receive health care, and participate in civic events.

4. Agency asset inventory – infrastructure-related assets that a government entity owns or manages (conduit, fiber, structures, real estate, poles, etc.) and broadband-related workforce development efforts in place.

5. Covered population barriers – identifies unique obstacles to broadband access faced by vulnerable populations and the organizations that serve them.

6. Internet service providers – identifies recruiting and hiring for broadband-related positions, broadband development strategies, and collaboration with communities to close the digital divide.

Workforce development opportunity survey



Georgia Workforce Development Opportunity Survey

Broadband infrastructure deployment and network operations require a highly skilled workforce. Your responses to this brief survey will help the Georgia Technology Authority identify opportunities for workforce training and readiness programs to prepare residents for new job opportunities in this field. This information will be an important part of Georgia's work toward achieving statewide universal access to high-speed broadband with federal funding through the Broadband, Equity, Access, and Deployment (BEAD) and Digital Equity Planning programs.

1. Contact information

Your name

Your job title

Your e-mail

Your phone number

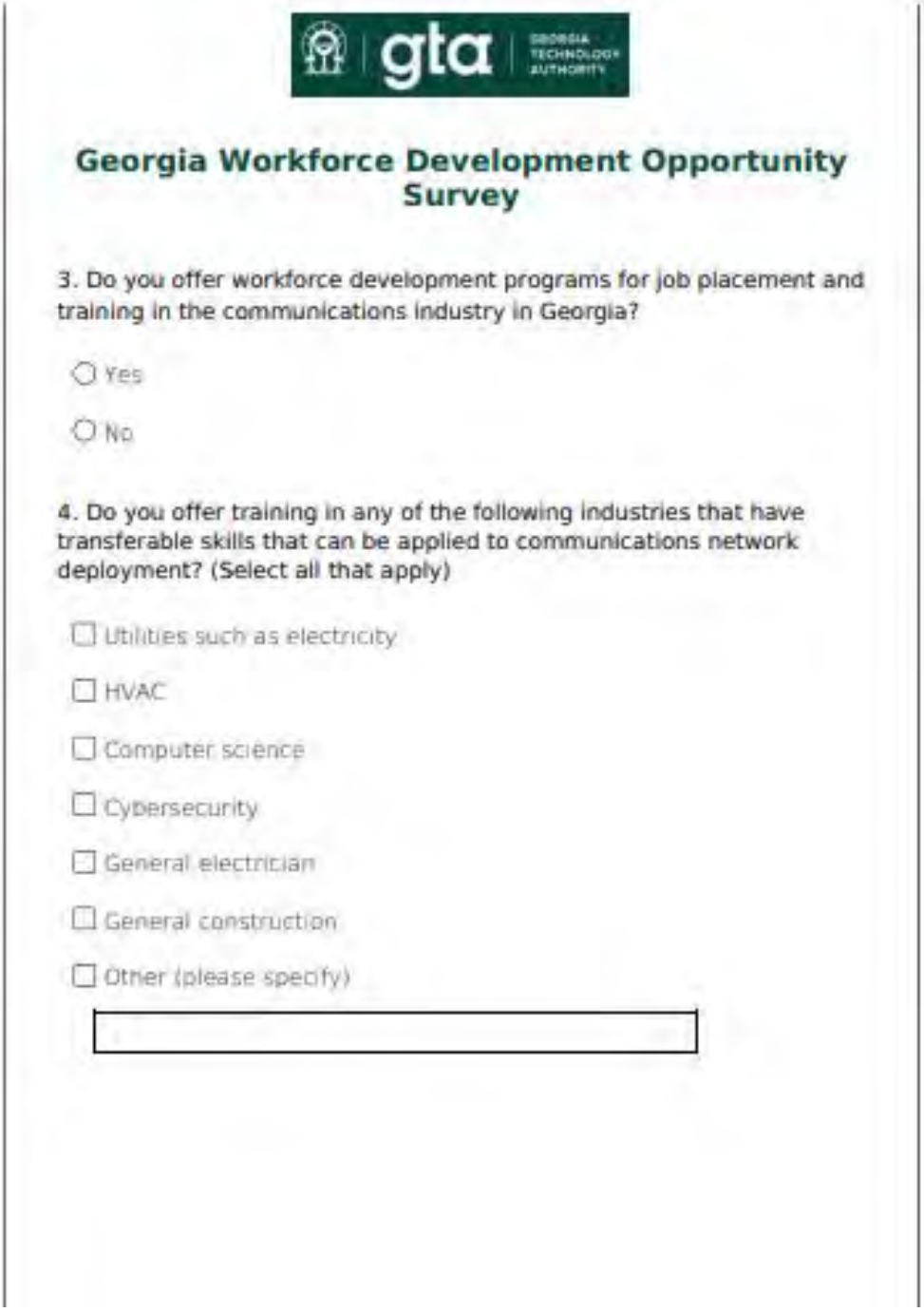
Organization name

Organization address

Organization website URL

2. Type of organization (one selection only)

- ○ Internet service provider (ISP)
- ○ Labor union
- ○ Trade association
- ○ Industry certification or standards body
- ○ Government agency (state, county, local, tribal, or regional consortia)
- ○ Economic development association or agency
- ○ Regional or local workforce development board or agency
- ○ K-12 education (private, charter, public)
- ○ Higher education organization (all levels, public or private)
- ○ Trade, technical or vocational school (public, nonprofit, or for-profit)
- ○ Community based or nonprofit organization



Georgia Workforce Development Opportunity Survey

3. Do you offer workforce development programs for job placement and training in the communications industry in Georgia?

- ○ Yes
- ○ No

4. Do you offer training in any of the following industries that have transferable skills that can be applied to communications network deployment? (Select all that apply)

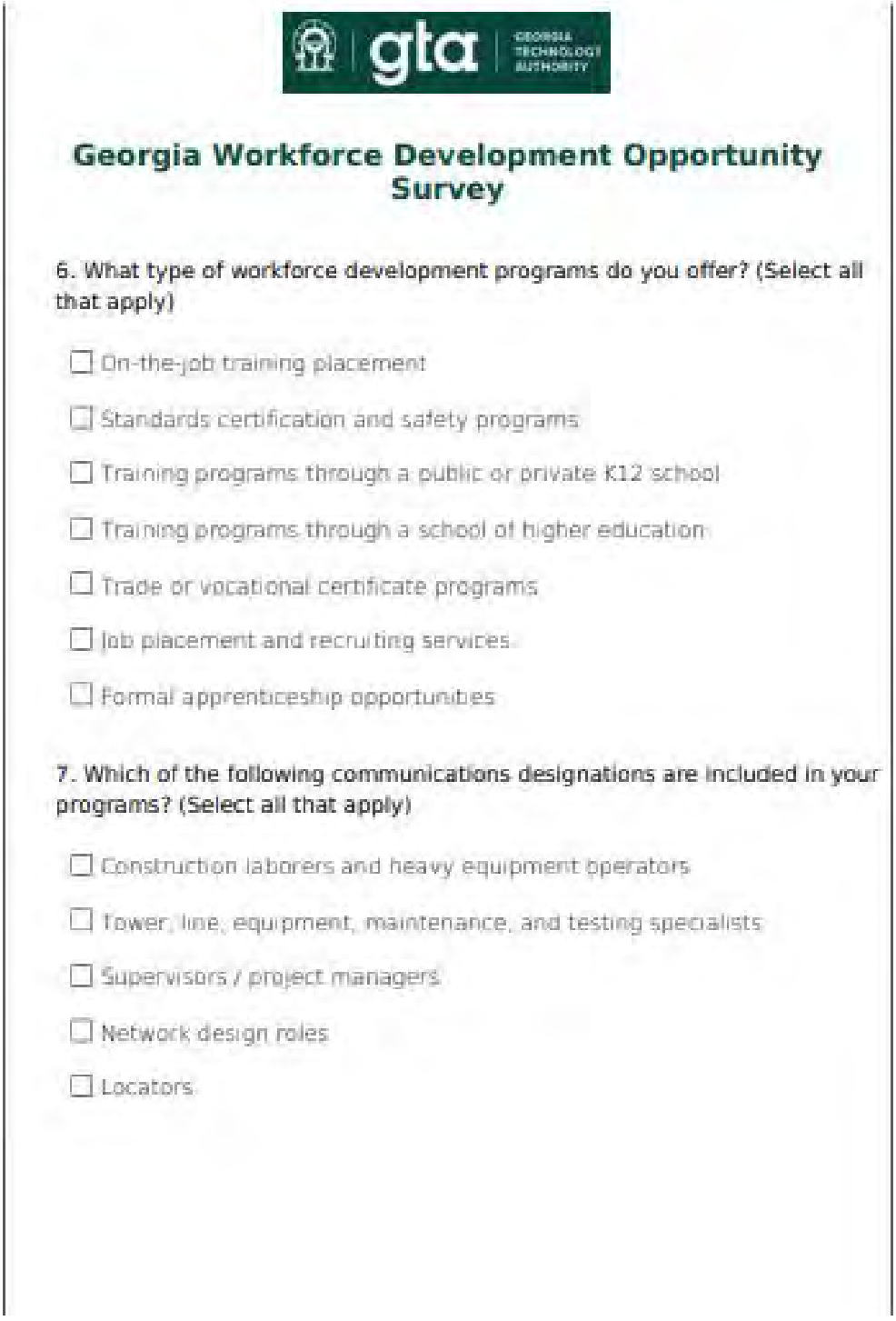
- ☐ Utilities such as electricity
- ☐ HVAC
- ☐ Computer science
- ☐ Cybersecurity
- ☐ General electrician
- ☐ General construction
- ☐ Other (please specify)

5. If you answered no to Question 3, are you interested in developing programs specifically targeted at employment opportunities in the communications industry?

☐ Yes

☐ No

Please describe your interest in developing these programs



Georgia Workforce Development Opportunity Survey

6. What type of workforce development programs do you offer? (Select all that apply)

- ☐ On-the-job training placement
- ☐ Standards certification and safety programs
- ☐ Training programs through a public or private K12 school
- ☐ Training programs through a school of higher education
- ☐ Trade or vocational certificate programs
- ☐ Job placement and recruiting services
- ☐ Formal apprenticeship opportunities

7. Which of the following communications designations are included in your programs? (Select all that apply)

- ☐ Construction laborers and heavy equipment operators
- ☐ Tower, line, equipment, maintenance, and testing specialists
- ☐ Supervisors / project managers
- ☐ Network design roles
- ☐ Locators

8. Does your program specifically reach out to any of the following populations for participation in your programs? (Select all that apply)

- ☐ Veterans or current military personnel
- ☐ People with disabilities
- ☐ Seniors
- ☐ Incarcerated or formerly incarcerated
- ☐ Those in low-income households or without reliable housing
- ☐ Those with a language barrier including English learners
- ☐ Those with a low level of literacy
- ☐ Specific racial or ethnic minority group(s)
- ☐ Those living in rural communities

9. How would you characterize your current capacity for developing and offering training programs to meet current workforce demands in the communications industry? (Select one)

- ○ Underutilized
- ○ Adequately utilized
- ○ At capacity

10. How would you characterize your plans for developing and offering additional programs to meet future workforce demands in the communications industry? (Select one)

- ☐ We have plans to add capacity
- ☐ We have no plans to add capacity
- ☐ We are reducing our training capacity
- ☐ We are interested in adding capacity, but do not have resources to do so

Please describe your plans for additional or expanded programs or explain what additional resources you would need to add capacity.

11. What are the sources of funding for your training programs? (Select all that apply)

- ☐ Federal agencies and programs
- ☐ State agencies and programs
- ☐ County or local funding and programs
- ☐ Private foundations
- ☐ Fundraising and community grants
- ☐ Partnerships with employers
- ☐ Partnerships with unions or trade associations
- ☐ Fee-based services
- ☐ Other (please specify)

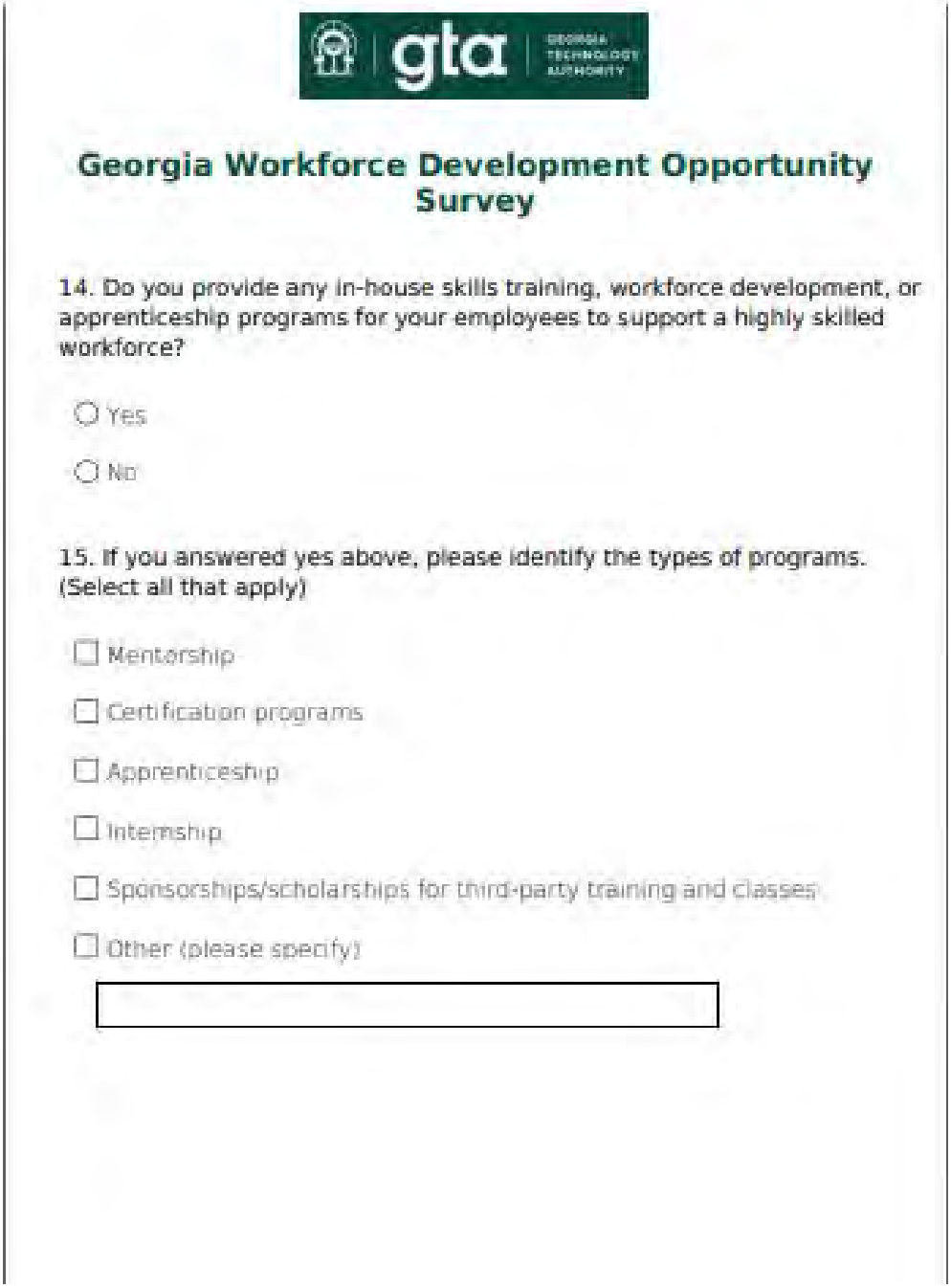
12. Do you serve "rural" communities?

☐ Yes

☐ No

What types of incentives are effective to recruit both skilled and manual labor to your rural community?

13. Please describe barriers to developing a diverse, skilled workforce in your community that can fill employment opportunities in the communications industry. Additionally, please provide examples or ideas of incentives or programs that can mitigate those barriers to create a diverse pool of highly skilled workers.



Georgia Workforce Development Opportunity Survey

14. Do you provide any in-house skills training, workforce development, or apprenticeship programs for your employees to support a highly skilled workforce?

- ○ Yes
- ○ No

15. If you answered yes above, please identify the types of programs. (Select all that apply)

- ☐ Mentorship
- ☐ Certification programs
- ☐ Apprenticeship
- ☐ Internship
- ☐ Sponsorships/scholarships for third-party training and classes
- ☐ Other (please specify)

16. In addition to any programs you directly provide, what other sources or programs do you use in Georgia to train and support workforce readiness among your employees? (Select all that apply)

- ☐ Standards certification and safety programs
- ☐ Training programs through a public or private K-12 school
- ☐ Training programs through a school of higher education
- ☐ Trade or vocational certificate programs
- ☐ Formal apprenticeship programs

17. What sources or programs do you use to recruit and hire employees, including technicians, linemen, construction laborers and managers, and similar positions? (Select all that apply)

- ☐ Internet-based employment posting sites
- ☐ Workforce development and community job placement centers
- ☐ Communications industry specific training classes
- ☐ Third-party hiring and recruitment firms
- ☐ Advertisements in relevant trade association publications and websites
- ☐ Incentivizing employee referrals

18. Do you have programs or incentives to support diversity among your employees when considering methods to attract, retain, and promote a skilled workforce?

19. Please describe your vision for workforce readiness programs, recruitment practices, and wrap around services to support broadband expansion in Georgia over the next five years.

Digital connectivity program inventory survey

* 1. Which category best describes your organization? Please select all that apply.

- ☐ K - 12 school
- ☐ Community college and institution of higher education
- ☐ Library
- ☐ Medical and health care provider
- ☐ State government
- ☐ County government
- ☐ Municipal government
- ☐ Council of governments (COG) or regional authority
- ☐ Tribal government
- ☐ Public housing authority
- ☐ Civil rights organization
- ☐ Workforce development and adult literacy organization
- ☐ Internet Service Provider (ISP)
- ☐ Business
- ☐ Regional or industry association or commission
- ☐ Non-profit organization that represents individuals with disabilities
- ☐ Non-profit organization that represents veterans
- ☐ Non-profit organization that represents aging individuals
- ☐ Non-profit organization that represents incarcerated individuals
- ☐ Non-profit organization that represents English learners

2. Has your organization created a broadband and/or digital equity plan?

- ◯ Yes
- ◯ No

3. Is your organization part of a broadband coalition?

- ◯ Yes
- ◯ No

* 4. Please provide the information for a point of contact in your organization.

Name	
Organization name	
Address	
Address 2	
City/Town	
State/Province	
ZIP/Postal Code	
Email Address	
Phone Number	

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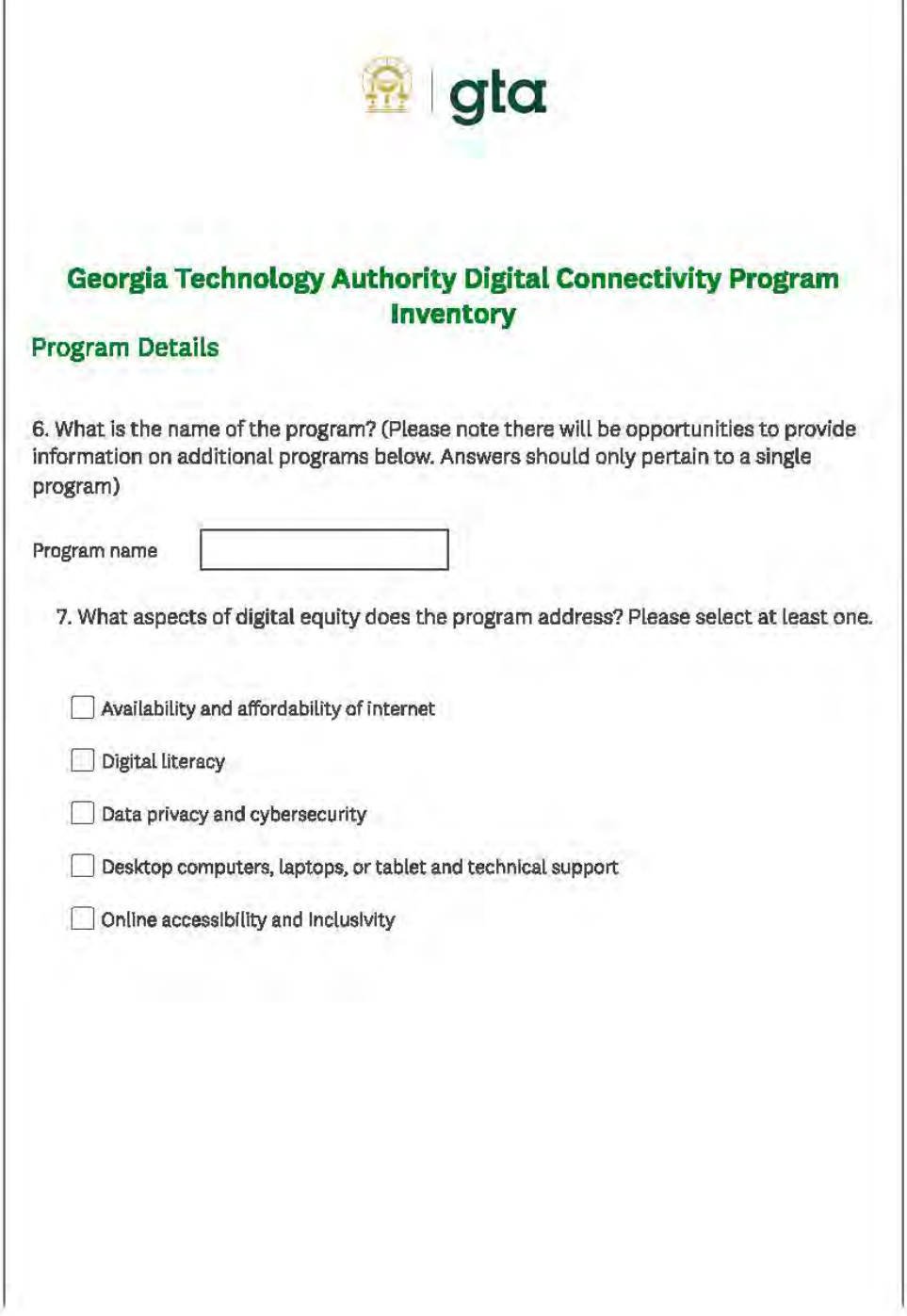
Georgia Technology Authority Digital Connectivity Program Inventory

Program Details

Digital equity programs aim to ensure that communities have the skills, technology, and capacity to fully engage in the digital economy. Certain programs focus on populations which include low-income, seniors, veterans, people with disabilities, incarcerated, English learners, ethnic minorities, and people in rural areas. Examples of digital equity programs include those that promote computer skills, internet access, and computing device access.

5. Does your organization offer digital equity programs?

- ◯ Yes
- ◯ No



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Georgia Technology Authority Digital Connectivity Program Inventory

Program Details

6. What is the name of the program? (Please note there will be opportunities to provide information on additional programs below. Answers should only pertain to a single program)

Program name

7. What aspects of digital equity does the program address? Please select at least one.

- [ ] Availability and affordability of internet
- [ ] Digital literacy
- [ ] Data privacy and cybersecurity
- [ ] Desktop computers, laptops, or tablet and technical support
- [ ] Online accessibility and inclusivity

8. Does the program focus on certain populations? Check all that apply.

- ☐ Individuals with disabilities
- ☐ Veterans
- ☐ Aging individuals (60 and above)
- ☐ Incarcerated individuals
- ☐ Individuals with a language barrier, including individuals who are English learners; and have low levels of literacy
- ☐ Individuals who primarily reside in a rural area
- ☐ Individuals who are members of a racial or ethnic minority group
- ☐ Individuals who live in a covered household (household income is lower than 150% of the poverty level)
- ☐ No particular focus on a population
- ☐ Other (please specify)

9. What is the project budget?

- ◯ $1 to $24,999
- ◯ $25,000 to $49,999
- ◯ $50,000 to $99,999
- ◯ $100,000 to $249,999
- ◯ $250,000 to $499,999
- ◯ Over $500,000

10. How much does the program cost to the participant?

Cost in dollars

11. Please give us a sense of the geography you serve.

- ◯ State-wide
- ◯ County-wide
- ◯ City-wide
- ◯ Neighborhood-wide
- ◯ Other (please specify)

12. How long has the program been active, in months?

Program length in **months**

13. How many people were served by the program in the 2022 calendar year?

- ◯ Under 25 people
- ◯ 26 to 50 people
- ◯ 51 to 100 people
- ◯ More than 100 people

14. How many users do you expect to serve over the life of the program?

- ◯ 1 to 50
- ◯ 51 to 100 people
- ◯ 101 to 250 people
- ◯ 251 to 500 people
- ◯ More than 500 people

15. If you had the resources, would you want to scale the project to serve more communities and people?

- ◯ Yes
- ◯ No

16. Does your organization have another digital equity program?

- ◯ Yes
- ◯ No

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Georgia Technology Authority Digital Connectivity Program Inventory

Program Details

17. What is the name of the program? (Please note there will be opportunities to provide information on additional programs below. Answers should only pertain to a single program)

Program name

18. What aspects of digital equity does the program address? Please select at least one.

- [ ] Availability and affordability of internet
- [ ] Digital literacy
- [ ] Data privacy and cybersecurity
- [ ] Desktop computers, laptops, or tablet and technical support
- [ ] Online accessibility and inclusivity

19. Does the program focus on certain populations? Check all that apply.

- ☐ Individuals with disabilities
- ☐ Veterans
- ☐ Aging individuals (60 and above)
- ☐ Incarcerated individuals
- ☐ Individuals with a language barrier, including individuals who are English learners; and have low levels of literacy
- ☐ Individuals who primarily reside in a rural area
- ☐ Individuals who are members of a racial or ethnic minority group
- ☐ Individuals who live in a covered household (household income is lower than 150% of the poverty level)
- ☐ No particular focus on a population
- ☐ Other (please specify)

20. What is the project budget?

- ◯ $1 to $24,999
- ◯ $25,000 to $49,999
- ◯ $50,000 to $99,999
- ◯ $100,000 to $249,999
- ◯ $250,000 to $499,999
- ◯ Over $500,000
- ◯ N/A

21. How much does the program cost to the participant?

Cost in dollars

22. Please give us a sense of the geography you serve.

- ◯ State-wide
- ◯ County-wide
- ◯ City-wide
- ◯ Neighborhood-wide
- ◯ Other (please specify)

23. How long has the program been active, in months?

Program length in **months**

24. How many people were served by the program in the 2022 calendar year?

- ◯ Under 25 people
- ◯ 26 to 50 people
- ◯ 51 to 100 people
- ◯ More than 100 people

25. How many users do you expect to serve over the life of the program?

- ◯ 1 to 50
- ◯ 51 to 100 people
- ◯ 101 to 250 people
- ◯ 251 to 500 people
- ◯ More than 500 people

26. If you had the resources, would you want to scale the project to serve more communities and people?

- ◯ Yes
- ◯ No

27. Does your organization have another digital equity program?

- ◯ Yes
- ◯ No

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Georgia Technology Authority Digital Connectivity Program Inventory

Program Details

28. What is the name of the program? (Please note there will be opportunities to provide information on additional programs below. Answers should only pertain to a single program)

Program name

29. What aspects of digital equity does the program address? Please select at least one.

- [ ] Availability and affordability of internet
- [ ] Digital literacy
- [ ] Data privacy and cybersecurity
- [ ] Desktop computers, laptops, or tablet and technical support
- [ ] Online accessibility and inclusivity

30. Does the program focus on certain populations? Check all that apply.

- [ ] Individuals with disabilities
- [ ] Veterans
- [ ] Aging individuals (60 and above)
- [ ] Incarcerated individuals
- [ ] Individuals with a language barrier, including individuals who are English learners; and have low levels of literacy
- [ ] Individuals who primarily reside in a rural area
- [ ] Individuals who are members of a racial or ethnic minority group
- [ ] Individuals who live in a covered household (household income is lower than 150% of the poverty level)
- [ ] No particular focus on a population
- [ ] Other (please specify)

31. What is the project budget?

- ◯ $1 to $24,999
- ◯ $25,000 to $49,999
- ◯ $50,000 to $99,999
- ◯ $100,000 to $249,999
- ◯ $250,000 to $499,999
- ◯ Over $500,000
- ◯ N/A

32. How much does the program cost to the participant?

Cost in dollars

33. Please give us a sense of the geography you serve.

- ◯ State-wide
- ◯ County-wide
- ◯ City-wide
- ◯ Neighborhood-wide
- ◯ Other (please specify)

34. How long has the program been active, in months?

Program length in **months**

35. How many people were served by the program in the 2022 calendar year?

- ◯ Under 25 people
- ◯ 26 to 50 people
- ◯ 51 to 100 people
- ◯ More than 100 people

36. How many users do you expect to serve over the life of the program?

- ◯ 1 to 50
- ◯ 51 to 100 people
- ◯ 101 to 250 people
- ◯ 251 to 500 people
- ◯ More than 500 people

37. If you had the resources, would you want to scale the project to serve more communities and people?

- ◯ Yes
- ◯ No

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Georgia Technology Authority Digital Connectivity Program Inventory

Planned Programs

38. Is your organization in the process of developing a digital equity program?

- ◯ Yes
- ◯ No

39. What kind of digital equity program(s) is your organization developing? Please select the categories that best fits the program type.

- ☐ Digital skills and literacy
- ☐ Data privacy and cybersecurity
- ☐ Devices (Laptops, computers, tablets)
- ☐ Technical support
- ☐ Digital navigators
- ☐ Broadband access
- ☐ Creating accessible and inclusive internet content

Other (please specify)

40. Does your organization want to develop a digital equity program?

- ◯ Yes
- ◯ No

41. What kind of digital equity program(s) is your organization interested in developing? Please select the categories that best fits the program type.

- ☐ Digital skills and literacy
- ☐ Data privacy and cybersecurity
- ☐ Devices (Laptops, computers, tablets)
- ☐ Technical support
- ☐ Digital navigators
- ☐ Broadband access
- ☐ Creating accessible and inclusive internet content

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Georgia Technology Authority Digital Connectivity Program Inventory

42. Please describe how access to affordable, reliable, and secure high-speed broadband by the communities that you serve may impact programmatic outcomes of your organization?

43. Do you have metrics to measure progress on your programmatic outcomes?

- [ ] Yes
- [ ] No

If yes, please describe or provide a URL link with documentation.

Please provide examples or a discussion of metrics that you believe would be useful to track broadband related inputs and outcomes that are relevant to your mission, programs, and services.

44. Economic and workforce development outcomes - input and outcome metrics

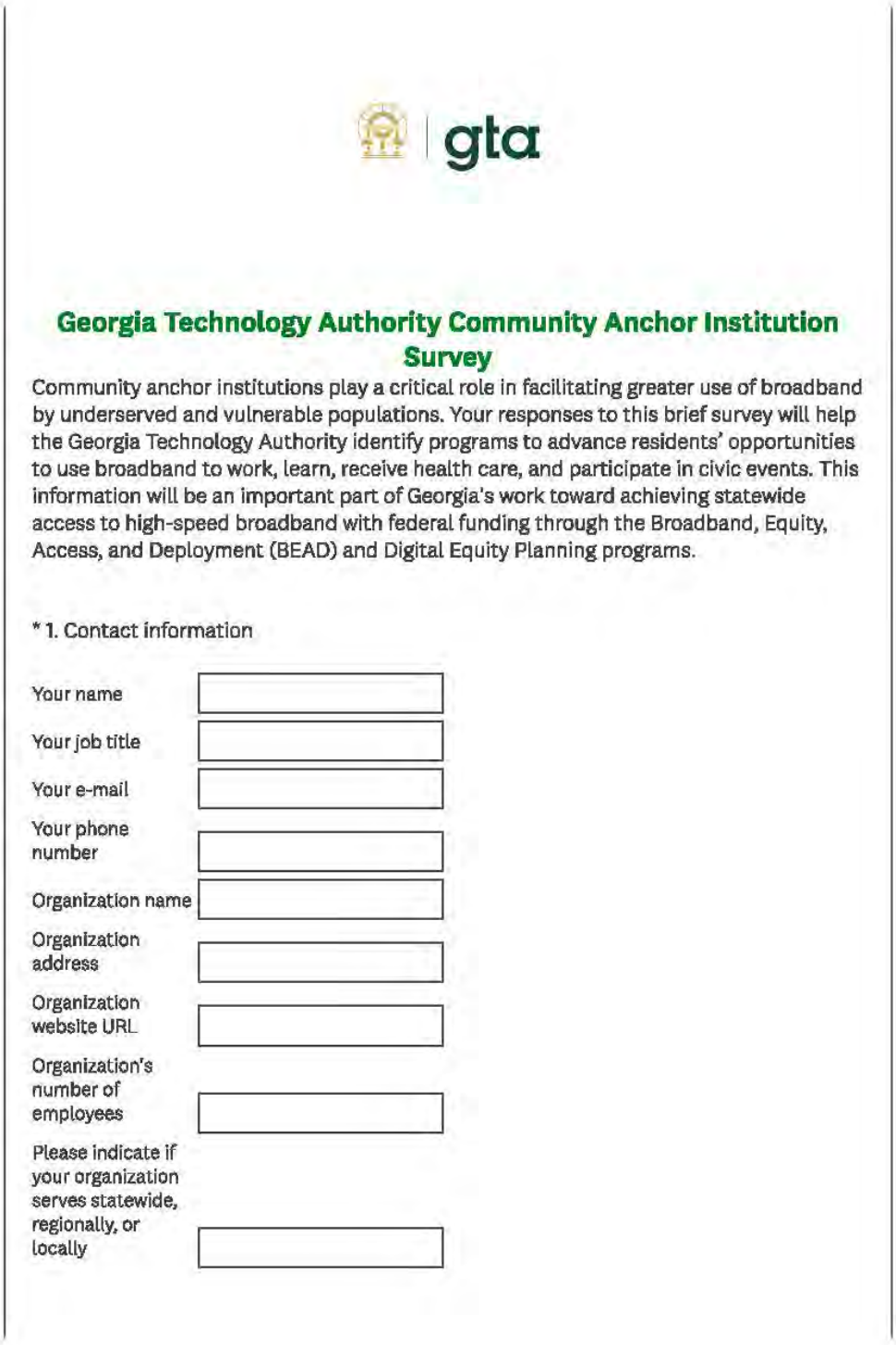
45. Educational outcomes - input and outcome metrics

46. Health outcomes - input and outcome metrics

47. Civic and social engagement outcomes - input and outcome metrics

48. Delivery of other essential services outcomes - input and outcome metrics

Community anchor institution survey



Georgia Technology Authority Community Anchor Institution Survey

Community anchor institutions play a critical role in facilitating greater use of broadband by underserved and vulnerable populations. Your responses to this brief survey will help the Georgia Technology Authority identify programs to advance residents' opportunities to use broadband to work, learn, receive health care, and participate in civic events. This information will be an important part of Georgia's work toward achieving statewide access to high-speed broadband with federal funding through the Broadband, Equity, Access, and Deployment (BEAD) and Digital Equity Planning programs.

* 1. Contact information

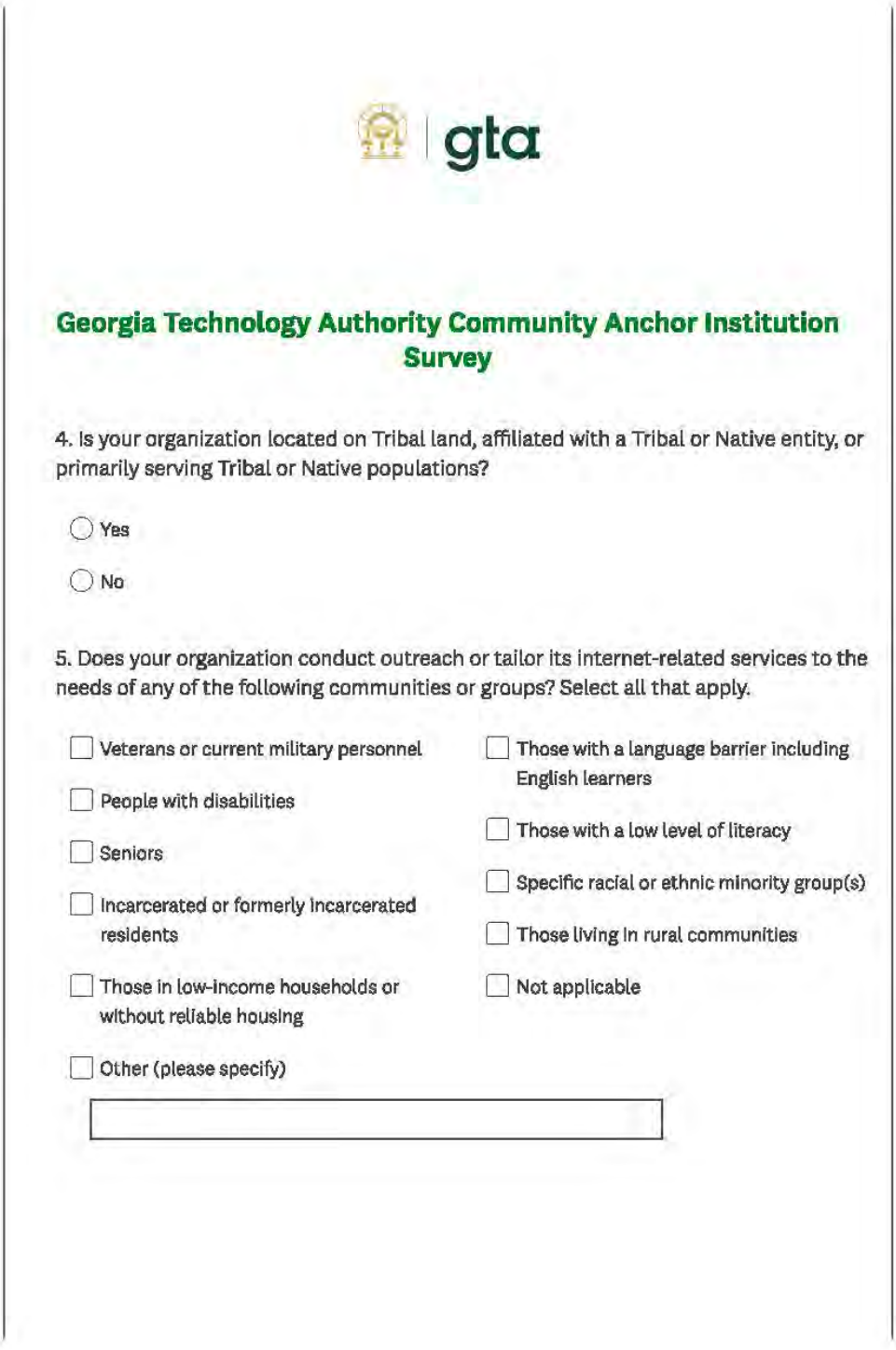
Your name	
Your job title	
Your e-mail	
Your phone number	
Organization name	
Organization address	
Organization website URL	
Organization's number of employees	
Please indicate if your organization serves statewide, regionally, or locally	

2. Choose the option that best describes your organization. Select the one that best applies.

- ◯ K-12 school
- ◯ Higher education entity
- ◯ Library
- ◯ Health clinic, health center, hospital, or other medical provider
- ◯ Public safety entity
- ◯ Public housing organization (including HUD-assisted housing and tribal housing organizations)
- ◯ Neighborhood organization and community center
- ◯ Faith-based organization
- ◯ Community support organization that facilitates use of broadband service by low-income or other underserved populations

3. Which of the following programs or services do you offer to facilitate the use of broadband services by your constituents or clients? Select all that apply.

- ☐ Support for applicants to broadband subsidy programs such as the Affordable Connectivity Program (ACP)
- ☐ Loans or donations of devices (computers, tablets) to access the internet
- ☐ Hotspots and free or subsidized internet access
- ☐ Cybersecurity training
- ☐ Other digital literacy training
- ☐ Training, equipment, subsidized services, or other resources to facilitate access to telehealth and telemedicine services
- ☐ Training teachers of broadband skills and digital literacy
- ☐ Developing and distributing accessible online content or devices designed for us by persons with disabilities
- ☐ Developing and distributing accessible online content directed at populations with specific needs, such as seniors, low-income residents, those with low-literacy, and those whose first language is not English
- ☐ Broadband internet access services at community centers or other gathering spaces used by clients and constituents
- ☐ Funding of programs that provide any of the above programs, including broadband infrastructure, devices, and subsidies to support affordability
- ☐ Program development and planning of internet-related services
- ☐ Advocacy for digital inclusion, affordability, and the internet-related needs of vulnerable populations
- ☐ Emergency and disaster relief services such as evacuation centers, charging stations, replacement equipment, and information on grants, loans, and services to those impacted by disasters
- ☐ My organization does **not** offer programs that facilitate the use of broadband internet services
- ☐ Other (please specify)



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Georgia Technology Authority Community Anchor Institution Survey

4. Is your organization located on Tribal land, affiliated with a Tribal or Native entity, or primarily serving Tribal or Native populations?

- ◯ Yes
- ◯ No

5. Does your organization conduct outreach or tailor its internet-related services to the needs of any of the following communities or groups? Select all that apply.

- ☐ Veterans or current military personnel
- ☐ People with disabilities
- ☐ Seniors
- ☐ Incarcerated or formerly incarcerated residents
- ☐ Those in low-income households or without reliable housing
- ☐ Other (please specify)
- ☐ Those with a language barrier including English learners
- ☐ Those with a low level of literacy
- ☐ Specific racial or ethnic minority group(s)
- ☐ Those living in rural communities
- ☐ Not applicable

6. Based on your organization's observations and experience, please describe the barriers and obstacles (e.g. affordability, lack of digital literacy, language barriers) that prevent members of the communities your organization serves, including Tribal and Native populations, from accessing or using broadband internet services.

7. Do all of your organization's locations, offices, or community centers have access to broadband internet speeds of at least 1 Gigabit per second (Gbps) symmetrical (both upload and download)?

- ☐ Yes
- ☐ No
- ☐ I don't know

If **no**, please provide the addresses of the locations where your organization does not have access to broadband internet services of at least 1 Gbps symmetrical.

8. If your organization does not have access to, or does not purchase, service with symmetrical speeds of at least 1 Gbps, please describe why. Select all that apply.

- ☐ Service is unavailable
- ☐ Service is unreliable
- ☐ Service is expensive
- ☐ Customer service is inadequate
- ☐ Our operations do not require Gigabit-level services
- ☐ I do not know if 1 Gbps service is available at my location
- ☐ Other (please specify)

9. Does your current internet service meet the needs of your organization to deliver broadband-related programs to your clients and constituents?

- ☐ Yes
- ☐ No, service is unavailable
- ☐ No, service is unreliable
- ☐ No, service is expensive
- ☐ No, customer service is inadequate
- ☐ No, service is too complicated to set up and/or maintain
- ☐ Redundant connectivity necessary for our operations is too expensive/unavailable
- ☐ Other (please specify)

10. How essential is symmetrical Gigabit connectivity at your facilities to your ability to deliver your broadband-related services?

1 - Not important	2	3	4	5 - Critically important
○	○	○	○	○

11. Does your organization provide access to broadband internet services to clients, constituents, or visitors at each of your locations?

- ☐ Yes
- ☐ No

If **yes,** does your broadband internet service provide sufficient capacity to accommodate peak demand for such services at all of your locations? If **no**, is a lack of access to adequate internet services at your location preventing you from serving users?

12. Is it critical to your organization's mission and service delivery to maintain communications with **critical facilities** such as hospitals, schools, data centers, and public safety agencies during natural disasters and emergencies?

- [ ] Yes
- [ ] No

Please briefly describe your organization's need to remain connected to critical facilities and whether you believe your organization's current communications services meet this need.

13. Has your organization been consulted on disaster planning, emergency communications, or disaster recovery by your communications service provider or a local/regional government agency?

- [ ] Yes
- [ ] No

If yes, please briefly describe any plans or reports you think would be useful to the State's broadband and emergency communications planning efforts.

14. If you operate or sponsor any workforce development or training programs in the fields of telecommunications or technology, please select all that apply.

- [ ] We do not sponsor programs
- [ ] Mentorships
- [ ] Certification programs
- [ ] Registered apprenticeships
- [ ] Unregistered apprenticeships
- [ ] Pre-apprenticeships
- [ ] Internships
- [ ] Digital literacy training for specific employment opportunities
- [ ] Job placement and recruitment services
- [ ] Sponsorships/scholarships for third-party training and classes
- [ ] Other (please specify)

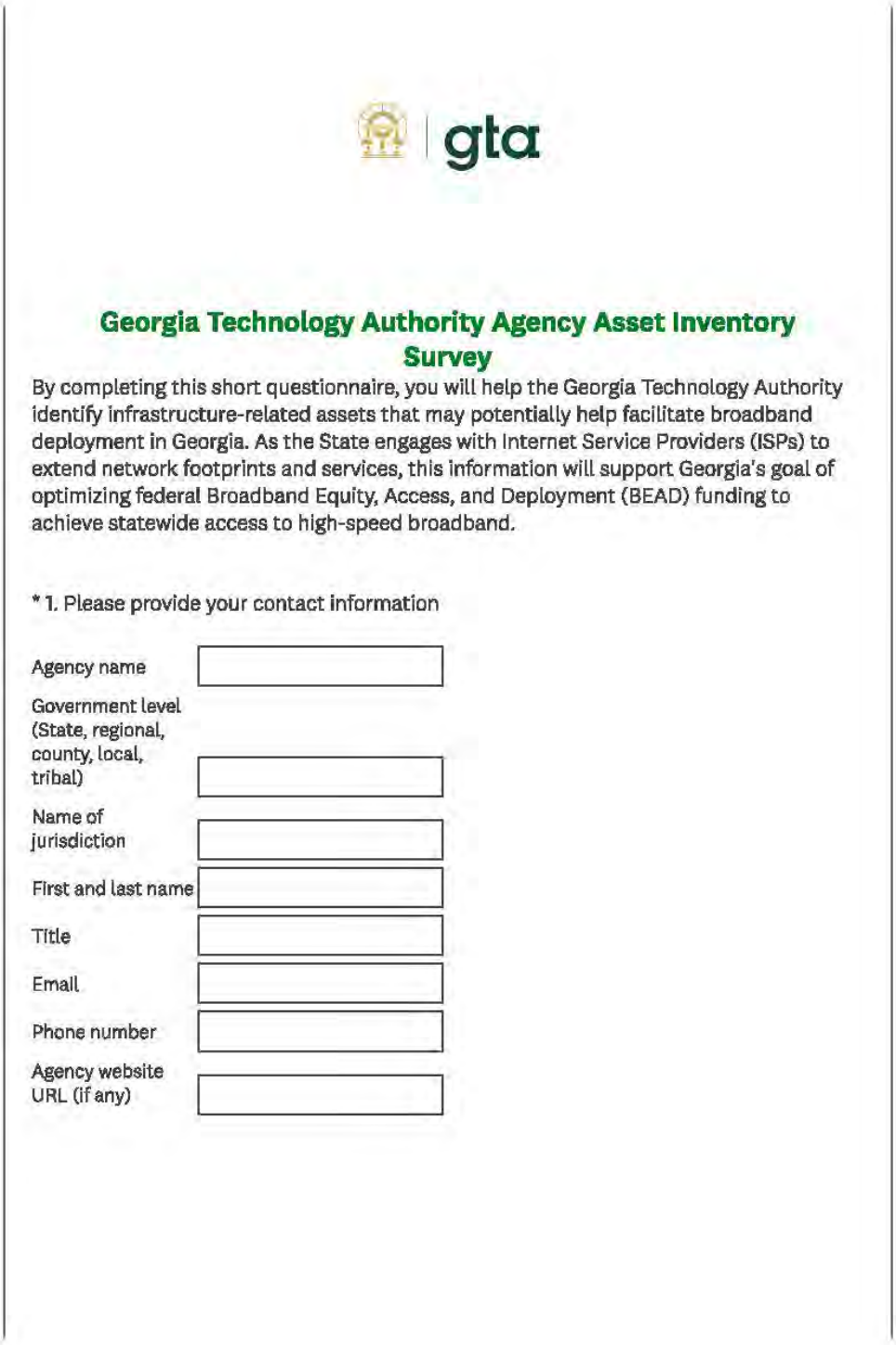
15. Would your organization offer additional broadband-related services or programs to its constituents or clients if it had additional resources?

- [ ] Yes
- [ ] No

If yes, please describe those additional broadband-related services and the additional resources your organization would need to offer them (e.g. funding, skilled workforce, access to broadband internet services with faster speeds or more capacity).

16. Please describe how your organization can collaborate with the Georgia Technology Authority and participate in its efforts to achieve statewide access to high-speed broadband.

Agency asset inventory survey



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Georgia Technology Authority Agency Asset Inventory Survey

By completing this short questionnaire, you will help the Georgia Technology Authority identify infrastructure-related assets that may potentially help facilitate broadband deployment in Georgia. As the State engages with Internet Service Providers (ISPs) to extend network footprints and services, this information will support Georgia's goal of optimizing federal Broadband Equity, Access, and Deployment (BEAD) funding to achieve statewide access to high-speed broadband.

* 1. Please provide your contact information

Agency name	
Government level (State, regional, county, local, tribal)	
Name of jurisdiction	
First and last name	
Title	
Email	
Phone number	
Agency website URL (if any)	

2. Does your agency own or manage physical assets (i.e. conduit, fiber, structures, real estate, poles, etc.) that are available for lease to Internet Service Providers (ISP) for broadband deployment?

☐ Yes

☐ No

What information about these leasable assets would you like the State to include in its broadband planning and communications with ISPs?

3. Will your agency oversee capital construction projects between now and 2027 that include opportunities for the placement of communications facilities by your agency, other state or local agencies, regional or local consortia, or ISPs?

☐ Yes

☐ No

What information about these projects (i.e. scope, location, schedule) would you like included in State broadband planning and in communications with ISPs?

4. Has your agency analyzed workforce readiness (i.e., the availability of skilled labor) in Georgia as it may impact State broadband policies and deployment goals?

☐ Yes

☐ No

Please provide a URL link where relevant documents, presentations, or analyses are located or send to the following email address: GTAbroadband@ctcnet.us

5. Does your agency have a role in workforce development that would support wired or wireless broadband deployment (including training and recruitment for equipment technicians, cable installation and repair, and construction jobs)?

☐ Yes

☐ No

Please describe programs or initiatives that your agency operates or supports or relevant programs operated by other agencies.

6. Are you aware of, or does your agency have reason to track and monitor frequent or widespread broadband or other communications outages that have significant impact on your community (or, if you represent a statewide organization, on the communities in Georgia)?

☐ Yes

☐ No

If yes, please describe your agency's role in monitoring or tracking communications reliability in your community and discuss the impact of significant outages.

7. Are you aware of, or is your agency involved in, planning efforts or development of regulations related to reliable and resilient emergency-level broadband or other communications services, especially services for critical facilities in Georgia (e.g. hospitals, schools, evacuation sites, utilities, data centers, public safety locations)?

☐ Yes

☐ No

Please provide a URL link to any publicly available materials relating to these issues and briefly describe the relevant issues related to critical facilities, including planning for climate and weather-related hazards. You may also email these materials to GTAbroadband@ctcnet.us

8. Has your agency developed any policies, regulations, or guidance regarding emergency communications, network redundancy, climate resilience, disaster preparedness, or disaster recovery planning applicable to the broadband and communications industry in Georgia?

☐ Yes

☐ No

Please provide a URL link to any publicly available documents and briefly describe policies and other materials that you believe would be helpful to Georgia's broadband planning efforts. You may also email these materials to GTAbroadband@ctcnet.us

9. Has your agency developed policies or strategic planning documents that will facilitate broadband access efforts in Georgia (e.g. publicly available information that directly addresses digital equity, infrastructure deployment, economic development, network resilience, partnerships, business planning, or other related efforts)?

☐ Yes

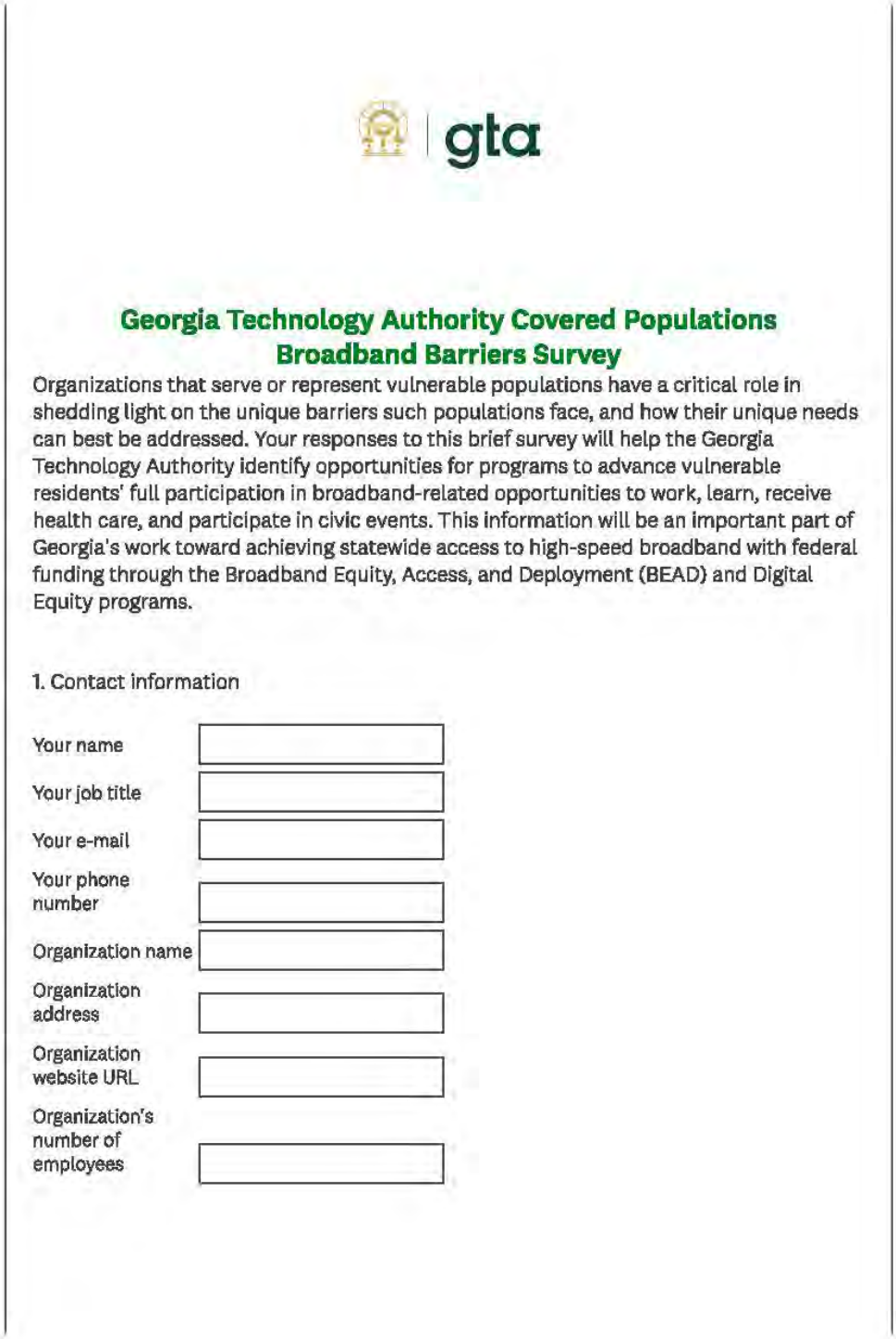
☐ No

Please briefly summarize the material and provide a URL link or email information to GTAbroadband@ctcnet.us

10. If applicable please share information regarding broadband-related planning efforts of other Georgia state and local agencies or contact information for agencies involved in broadband-related planning efforts, that you believe would be helpful to GTA's broadband planning efforts.

11. Please describe how your agency can collaborate with GTA and participate in its efforts to achieve statewide universal access to high-speed broadband.

Covered population barriers survey



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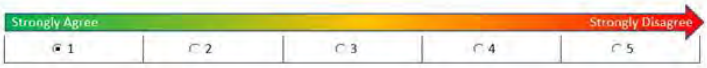
Georgia Technology Authority Covered Populations Broadband Barriers Survey

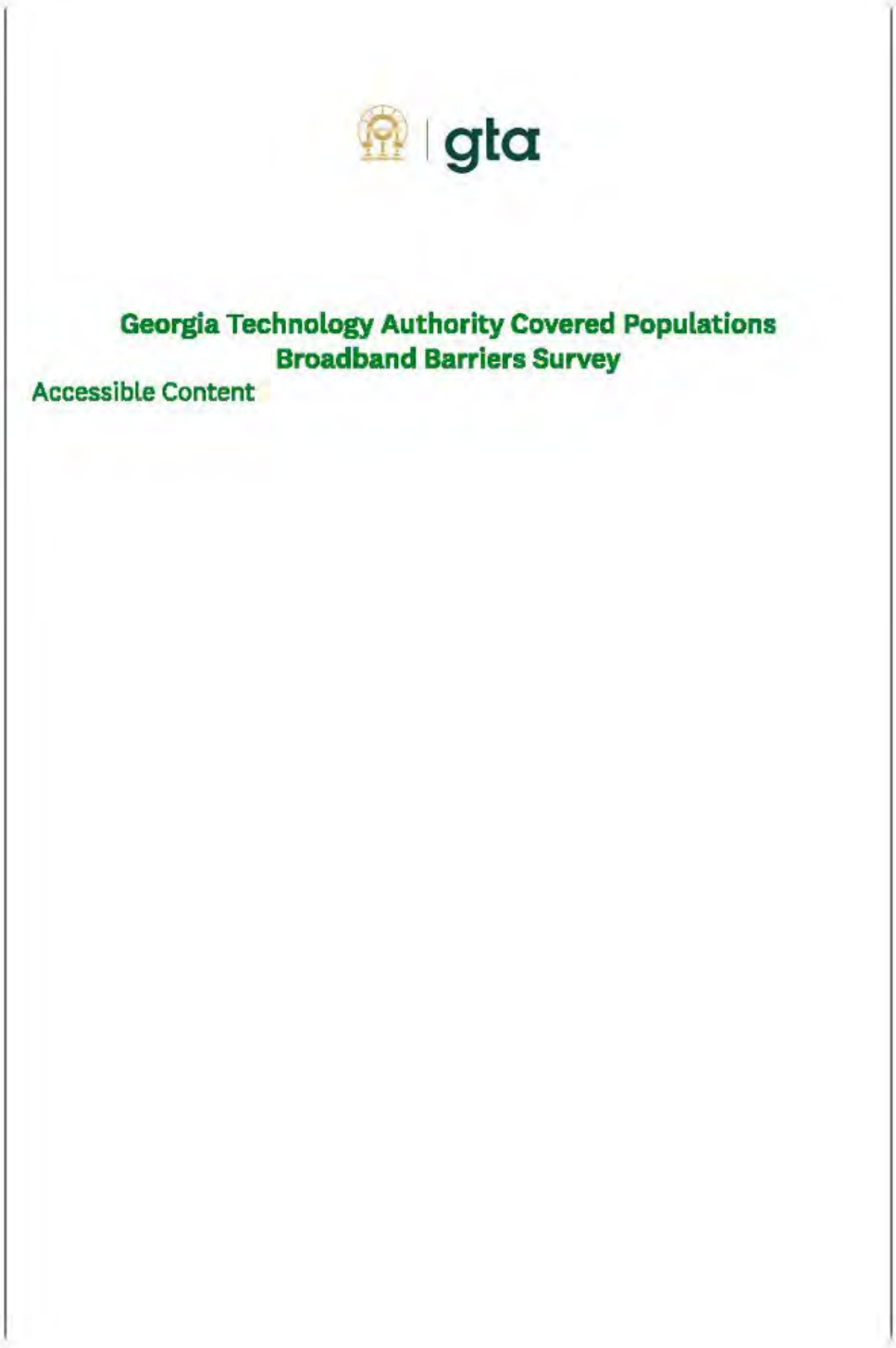
Organizations that serve or represent vulnerable populations have a critical role in shedding light on the unique barriers such populations face, and how their unique needs can best be addressed. Your responses to this brief survey will help the Georgia Technology Authority identify opportunities for programs to advance vulnerable residents' full participation in broadband-related opportunities to work, learn, receive health care, and participate in civic events. This information will be an important part of Georgia's work toward achieving statewide access to high-speed broadband with federal funding through the Broadband Equity, Access, and Deployment (BEAD) and Digital Equity programs.

1. Contact information

Your name	
Your job title	
Your e-mail	
Your phone number	
Organization name	
Organization address	
Organization website URL	
Organization's number of employees	

Georgia Technology Authority Covered Populations
Broadband Barriers Survey
Digital Literacy and Digital Skills

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Georgia Technology Authority Covered Populations
Broadband Barriers Survey
Accessible Content

2. Does your organization provide programs and services that are primarily targeted to any of the following communities? (Select all that apply)

- ☐ Individuals with disabilities
- ☐ Veterans or current military personnel
- ☐ Aging individuals
- ☐ Incarcerated individuals
- ☐ Individuals with low levels of literacy
- ☐ Individuals with a language barrier
- ☐ Individuals who primarily reside in a rural area
- ☐ Individuals who are members of a racial or ethnic minority group
- ☐ No particular focus on a population or community
- ☐ Other (please specify)

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Georgia Technology Authority Covered Populations Broadband Barriers Survey

Internet Service

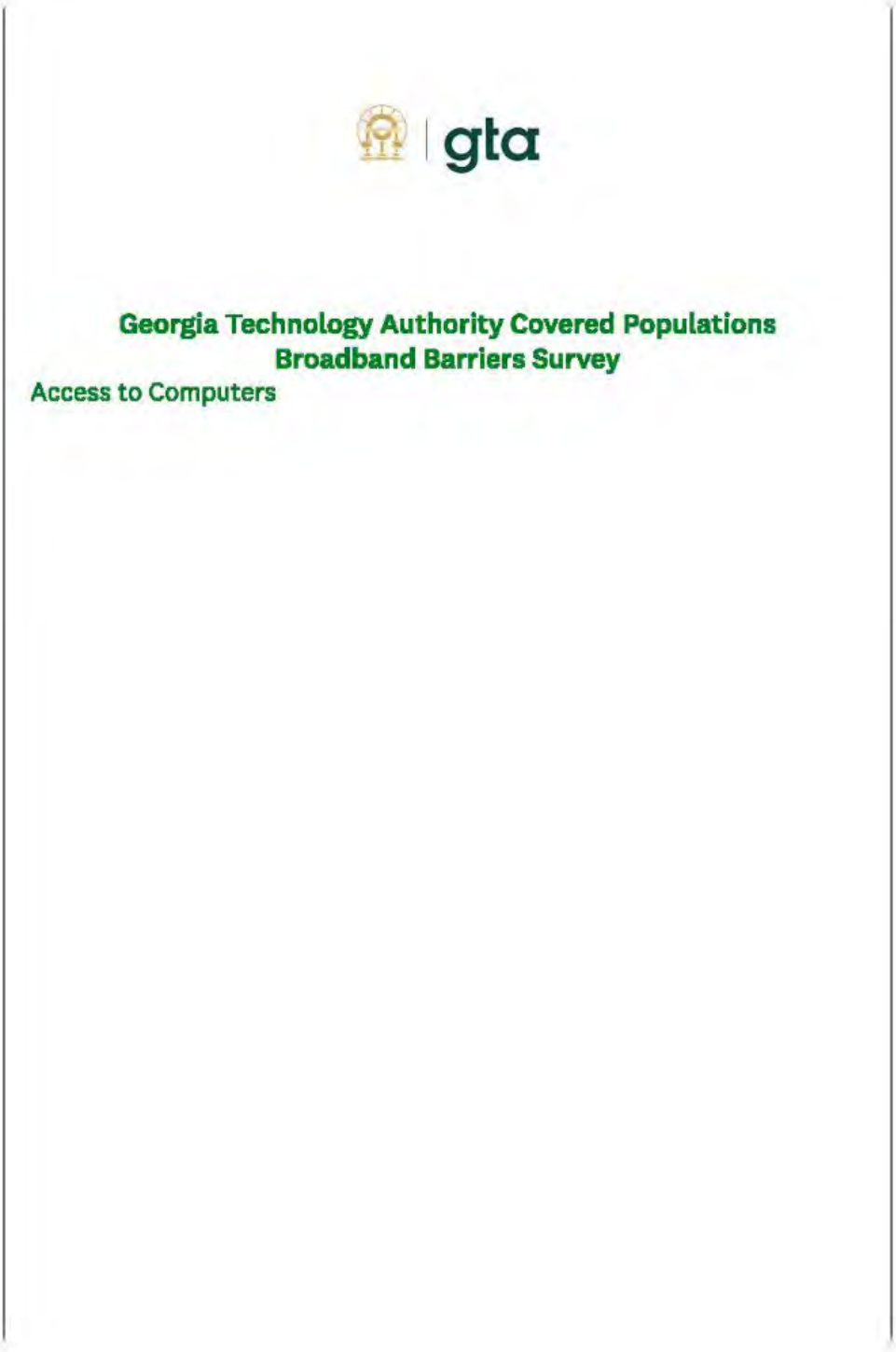
3. Please indicate your agreement or disagreement with the following statements describing individuals from the population(s) you serve or represent. On a scale of 1 - 5, where 1 is "strongly agree" and 5 is "strongly disagree" as representing on the spectrum.

	1 - Strongly Agree	2	3	4	5 - Strongly Disagree
Their households have access to some type of home internet service	○	○	○	○	○
The available internet service is high-speed, sufficient for their needs, and reliable	○	○	○	○	○
The available internet service is affordable.	○	○	○	○	○
Their households can choose from among more than one provider for high-speed, reliable, and affordable broadband service	○	○	○	○	○

4. Are there unique barriers to reliable, affordable, and high-speed internet service for the population(s) you serve?

- [ ] Yes
- [ ] No

Please describe these barriers to accessing reliable, affordable, and high-speed internet service: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Georgia Technology Authority Covered Populations
Broadband Barriers Survey
Access to Computers

5. Please indicate your agreement or disagreement with the following statements describing individuals from the population(s) you serve or represent. On a scale of 1 - 5, where 1 is "strongly agree" and 5 is "strongly disagree" as representing on the spectrum.

	1 - Strongly Agree	2	3	4	5 - Strongly Disagree
There are computers capable of utilizing highspeed internet services in the household of the populations we serve or represent.	○	○	○	○	○
The households can troubleshoot computer issues.	○	○	○	○	○
The households can afford computer repairs or service.	○	○	○	○	○
The households have enough devices to serve their needs.	○	○	○	○	○
There are public computers that are convenient to use and close by to these households.	○	○	○	○	○

6. Are there unique barriers to accessing home computers for the population(s) you serve?

☐ Yes

☐ No

Please describe these barriers to accessing computers and similar devices:

7. Please indicate your agreement or disagreement with the following statements describing individuals from the population(s) you serve or represent. On a scale of 1 - 5, where 1 is "strongly agree" and 5 is "strongly disagree" as representing on the spectrum.

	1 - Strongly Agree	2	3	4	5 - Strongly Disagree
Individuals can find, understand, evaluate, create, and communicate digital information.	○	○	○	○	○
Individuals can use technologies appropriately and effectively to retrieve information, interpret results, and judge the quality of that information.	○	○	○	○	○
Individuals can use the internet to support education, employment, health, and personal needs.	○	○	○	○	○
Individuals have access to convenient and comprehensive digital literacy training.	○	○	○	○	○

8. Are there unique barriers to digital skills for the population(s) your serve?

☐ Yes

☐ No

Please describe these barriers to acquiring necessary digital skills:

9. Please indicate your agreement or disagreement with the following statements describing individuals from the population(s) you serve or represent. On a scale of 1 - 5, where 1 is "strongly agree" and 5 is "strongly disagree" as representing on the spectrum.

	1 - Strongly Agree	2	3	4	5 - Strongly Disagree
Individuals have access to meaningful website content that is written in plain language and is appropriate for the targeted user or audience.	○	○	○	○	○
Individuals have access to meaningful website content that is accurately translated into necessary languages.	○	○	○	○	○
Individuals have access to meaningful website content that can be read by a screen reader.	○	○	○	○	○
Individuals have access to meaningful website content with closed captioning.	○	○	○	○	○
Individuals have access to adequate and appropriate assistive technologies to support access to the internet and use of website content by people with disabilities.	○	○	○	○	○

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Georgia Technology Authority Covered Populations Broadband Barriers Survey

Data Privacy and Cyber Security

11. Please indicate your agreement or disagreement with the following statements describing individuals from the population(s) you serve or represent. On a scale of 1 - 5, where 1 is "strongly agree" and 5 is "strongly disagree" as representing on the spectrum.

	1 - Strongly Agree	2	3	4	5 - Strongly Disagree
Individuals know how to protect their information online.	○	○	○	○	○
Individuals can recognize a phishing scam or other types of scams and illegal activity.	○	○	○	○	○
Individuals use anti-virus and anti-malware software on their computers.	○	○	○	○	○

12. Are there unique barriers to data privacy and cyber security for the population(s) your serve?

- [ ] Yes
- [ ] No

Please describe these barriers to acquiring literacy in data privacy and cyber security:

Georgia Technology Authority Covered Populations Broadband Barriers Survey

Initiatives to Address Barriers

Thinking about the unique barriers you discussed:

13. What types of programs and initiatives would you recommend to address these barriers?

14. Does your organization currently offer any of these types of programs or initiatives?

- ☐ Yes
- ☐ No

If yes, please describe if you are interested in expanding your programs and, if so, what types of resources would you need to expand:

15. Would your organization be interested in adding new programs to its current portfolio?

- [ ] Yes
- [ ] No

If yes, what types of resources do you believe would be necessary to add new programs to your current portfolio?

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Georgia Technology Authority Covered Populations Broadband Barriers Survey

Programmatic Impact of Broadband Access

16. Please describe how access to affordable, reliable, and secure high-speed broadband by the communities that you serve may impact the programmatic outcomes of your organization.

17. Do you have metrics to measure progress on your programmatic outcomes?

- ☐ Yes
- ☐ No

If yes, please describe:

Please provide examples or a discussion of metrics that you believe would be useful to track broadband related inputs and outcomes that are relevant to your mission, programs, and services.

18. Economic and workforce development outcomes - input and outcome metrics

19. Educational outcomes - input and outcome metrics

20. Health outcomes - input and outcome metrics

21. Civic and social engagement outcomes - input and outcome metrics

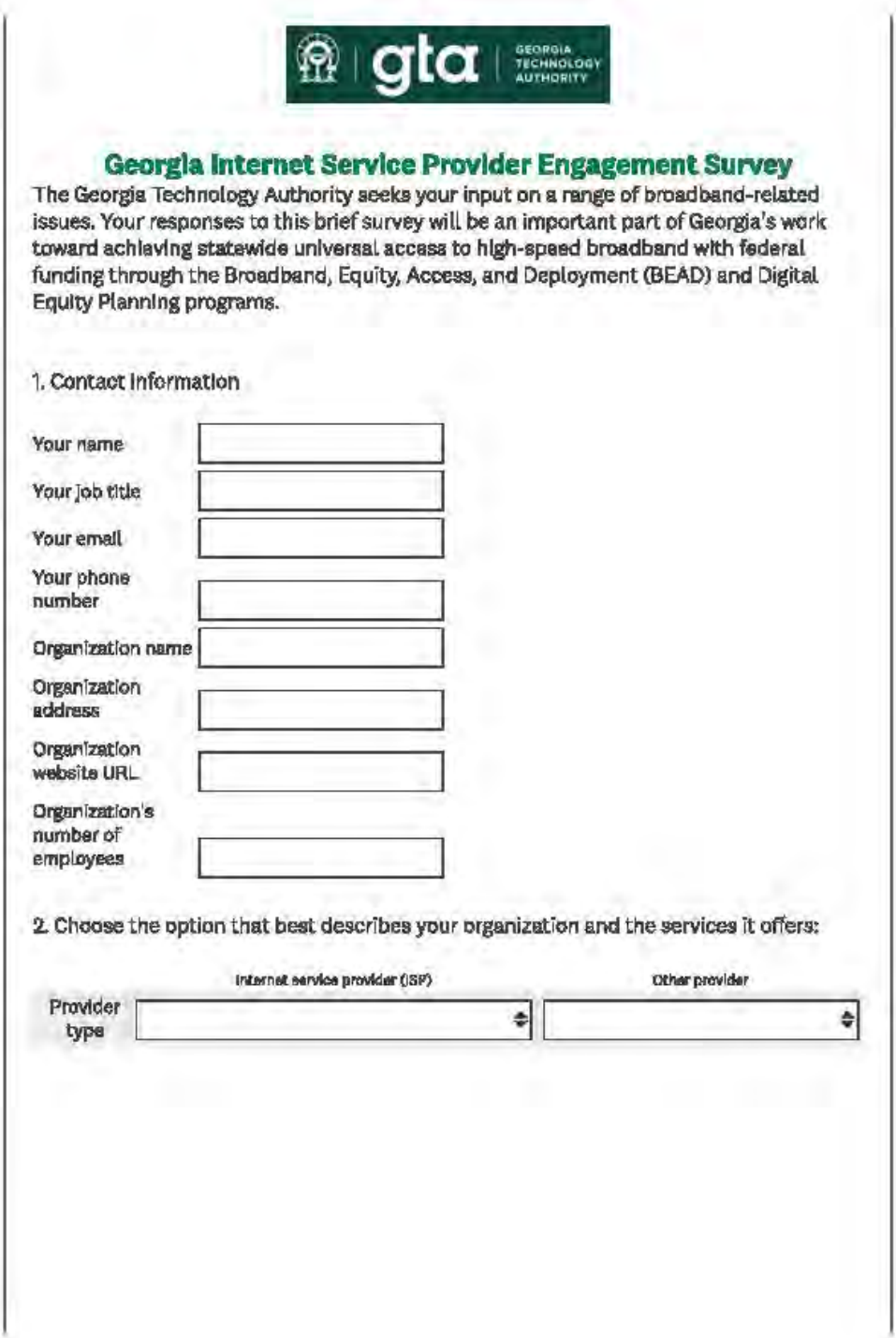
22. Delivery of other essential services outcomes - input and outcome metrics

10. Are there unique barriers to accessible content for the population(s) your serve?

- [ ] Yes
- [ ] No

Please describe these barriers to accessible content:

Internet service provider engagement survey



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Georgia Internet Service Provider Engagement Survey

The Georgia Technology Authority seeks your input on a range of broadband-related issues. Your responses to this brief survey will be an important part of Georgia's work toward achieving statewide universal access to high-speed broadband with federal funding through the Broadband, Equity, Access, and Deployment (BEAD) and Digital Equity Planning programs.

1. Contact Information

Your name	
Your job title	
Your email	
Your phone number	
Organization name	
Organization address	
Organization website URL	
Organization's number of employees	

2. Choose the option that best describes your organization and the services it offers:

	Internet service provider (ISP)	Other provider
Provider type		

3. What recruitment and hiring sources does your organization use to hire technicians, lineworkers, engineers, construction laborers and managers, and similar positions? (Select all that apply)

- ☐ Internet-based employment posting sites
- ☐ Workforce development and community job placement centers
- ☐ Communications industry-specific training classes
- ☐ Third-party hiring and recruitment firms
- ☐ Advertisements in trade association publications and websites
- ☐ Incentivizing employee referrals

4. Does your organization offer, sponsor, or participate in any workforce development or apprenticeship programs?

- ○ Yes
- ○ No

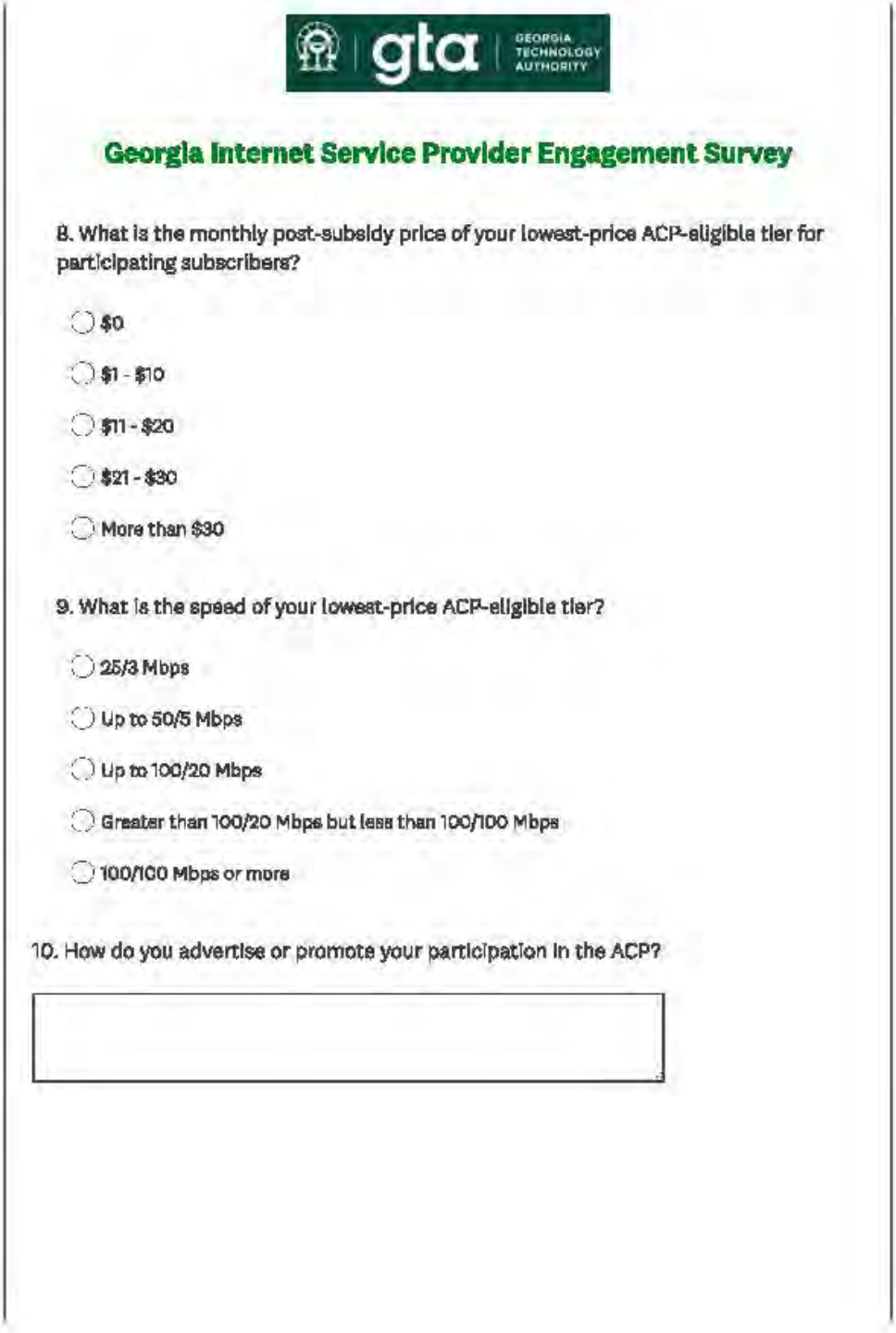
5. If you answered yes to Q.4, please specify the type of programs. (Select all that apply)

- ☐ Mentorship
- ☐ Certification programs
- ☐ Apprenticeship
- ☐ Internship
- ☐ Sponsorships/scholarships for third-party training and classes
- ☐ Other (please specify)

6. How would you propose to work with Georgia on workforce development issues related to broadband deployment, including programs to support diversity among your organization's employees?

7. Does your organization participate in the Affordable Connectivity Program (ACP)?

- ◯ Yes
- ◯ No



Georgia Internet Service Provider Engagement Survey

8. What is the monthly post-subsidy price of your lowest-price ACP-eligible tier for participating subscribers?

- ◯ $0
- ◯ $1 - $10
- ◯ $11 - $20
- ◯ $21 - $30
- ◯ More than $30

9. What is the speed of your lowest-price ACP-eligible tier?

- ◯ 25/3 Mbps
- ◯ Up to 50/5 Mbps
- ◯ Up to 100/20 Mbps
- ◯ Greater than 100/20 Mbps but less than 100/100 Mbps
- ◯ 100/100 Mbps or more

10. How do you advertise or promote your participation in the ACP?

11. Does your organization offer other programs for low-income customers?

- [ ] Yes
- [ ] No

Please provide service speeds, monthly pricing, and a description of your low-income or discounted offerings.

12. Does your organization have programs to support consumer broadband skills or use of the internet?

- [ ] Yes
- [ ] No

If yes, please describe and provide URL links to relevant materials.

13. Does your organization have programs to support internet adoption?

- [ ] Yes
- [ ] No

If yes, please describe and provide URL links to relevant materials.

14. Please describe how your organization can collaborate with local communities on efforts to close the digital divide and, if applicable, please provide specific examples where you have done this successfully.

15. What strategies has your organization used to deploy broadband in the areas of Georgia that are most expensive to serve?

16. Please discuss your continuity and disaster recovery plans in the event of a natural disaster or human error, such as a fiber cut, and whether any of your plans target specific geographic areas.

Appendix D: Stakeholder engagement schedule of sessions

The state's comprehensive stakeholder outreach and engagement efforts specifically through its "Let's Connect GA" tour included in-person public listening sessions throughout winter and spring 2023 across the state:

- February 20 – Columbus – Columbus Technical College
- February 22 – Griffin – Southern Crescent Technical College
- February 23 – Augusta – Georgia Cyber Center
- March 6 – Flowery Branch – Spout Springs Library
- March 6 – Gainesville – North Hall Community Center and Park
- March 7 – Calhoun – Georgia Northwest Technical College
- March 8 – Jonesboro – Clayton County International Park Lakeview Event Center
- March 9 – Athens – University of Georgia Center for Continuing Education and Hotel
- March 13 – Garden City / Savannah – Woodville-Thompkins High School
- March 14 – Jekyll Island – Georgia Accessibility Conference
- March 15 – Valdosta – Wiregrass Technical College
- March 16 – Albany – Albany State University West Campus Event Center
- March 20 – Vidalia – Southeastern Technical College
- March 21 – Macon – Buck Melton Community Center
- March 22 – Clarkston – Georgia Piedmont Technical College
- April 4 – Atlanta – National Coalition of Adult Basic Education Conference
- April 11 – Eastman – Eastman-Dodge Chamber of Commerce
- April 14 – Athens – Georgia Internet for All Meeting with NTIA
- April 18 – Cuthbert – Andrew College
- May 10 – Macon – Mercer University – Rural Healthcare Access
- June 7 – Chubbtown – Community Technology Meeting
- June 8 – Covington – Montecillo and Covington Community Leaders Digital Connectivity Listening Session
- June 14 – Augusta – Central Savannah Regional Area with Paine College (HBCU)
- **Additional In-person stakeholder meetings:**
    - March 23 – Atlanta – Digital Connections Symposium
    - April 27-28 – Atlanta – National Summit on State Planning for Digital Equity and Economic Inclusion

Appendix E: Stakeholder engagement schedule of virtual meetings

The State's comprehensive stakeholder outreach and engagement efforts included virtual meetings aligned with the key categories identified in the Plan and included a focus on digital connectivity issues:

- February 24 – Virtual – Workforce Development
- March 3 – Virtual – Workforce Development
- March 10 – Virtual – Internet Service Providers
- March 17 – Virtual – Internet Service Providers
- March 24 – Virtual – Local and Regional Government
- March 27 – Virtual – Local and Regional Government
- March 28 – Virtual – Education (Early, K-12, Higher Ed)
- March 29 – Virtual – Education (Early, K-12, Higher Ed)
- March 30 – Virtual – Community Organizations (non-profits, libraries, health, housing, etc.)
- March 31 – Virtual – Community Organizations (non-profits, libraries, health, housing, etc.)
- April 13 – Virtual – Internet Service Providers session I
- April 13 – Virtual – Internet Service Providers session II
- April 17 – Virtual – Family Connections Partnership Network Meeting
- May 2 – Virtual – Central Savannah Regional Area with Paine College
- May 3 – Virtual – Atlanta Black Chamber of Commerce
- May 4 – Virtual – Internet Service Providers
- May 8 – Audio – AARP Tele-Townhall
- May 16 – Virtual – Family Connections Region 6 Network Meeting
- **Additional Virtual Stakeholder Engagements**
    - May 6 – Georgia Radio Reading Service – The ScottLite Show – Blind/Print Disabled virtual show
    - June 6 – Tuesdays with Tootle – Disability Community Virtual Show
    - June 15 – Community Advisory Board Meeting for Connecting Minority Communities – Fort Valley State University (HBCU)

Appendix F: Stakeholder engagement list of participants

Participants in the State's comprehensive stakeholder outreach and engagement efforts included representatives of the following organizations:

Table 16: Stakeholder engagement outreach list

Entity name	Entity type
A2D	Internet Service Provider
AARP Georgia	Organizations that Represent and Support Aging Populations
Accelecom	Internet Service Provider
Accord Technologies	Industry Related Entities
Albany State University	HBCUs
Albany Technical College	Community Colleges
Alma Telephone Company	Internet Service Provider
Altamaha EMC cooperative	Internet Service Provider
Association County Commissions of Georgia	Association
AT&T	Internet Service Provider
ATC Broadband	Internet Service Provider
Athens Clarke County government	Government
Atlanta Housing	Public Housing Authorities or Owners of HUD-assisted Housing
Atlanta Public Schools	K-12 Schools
Baker County Government	Government
Bank On Georgia	Non-profit
Bartow County Schools	K-12 Schools
BEAM CTY	Internet Service Provider
Berrien County Schools	K-12 Schools
Black Churches 4 Digital Equity Coalition	Organizations that Represent and Support Racial and Ethnic Minorities
Bleckley County Government	Government
BorderHawk	Industry Related Entities
Brantley Telephone Company	Internet Service Provider
Bulloch County Rural Telephone Cooperative	Internet Service Provider
Cable One, Inc.	Internet Service Provider
Calhoun Times	Industry Related Entities
Candler County Board of Commissioners	Government
Canoochee EMC	Internet Service Provider
Carroll EMC	Internet Service Provider
Catholic Charities Atlanta	Non-profit
Central Georgia EMC	Internet Service Provider
Central Georgia Technical College	Community Colleges
Charter Communications	Internet Service Provider
Chatham County	Government
Chattooga County Schools	K-12 Schools

Entity name	Entity type
Chickamauga Telephone Company	Internet Service Provider
City of Albany	Government
City of Albany-Telecommunications Network	Government
City of Arlington	Government
City of Atlanta	Government
City of Augusta	Government
City of Calhoun	Government
City of Calhoun City Council	Government
City of Camden	Government
City of Clarkston	Government
City of Climax	Government
City of College Park	Government
City of Colquitt	Government
City of Dublin	Government
City of Eastman	Government
City of Eastman-Downtown Development Authority	Economic Development Agencies and Organizations
City of Fort Gaines	Government
City of Glennville	Government
City of Griffin Schools	Government
City of Griffin-fiber network	Internet Service Provider
City of Jonesboro	Government
City of Kennesaw	Government
City of LaFayette	Government
City of Lakeland	Government
City of Loganville	Government
City of Meigs	Government
City of Metter-Georgia Grown Innovation Center	Government
City of Molena	Government
City of Morrow	Government
City of Norcross	Government
City of Savannah	Government
City of Shady Dale	Government
City of South Fulton	Government
City of Statham	Government
City of Thomasville	Government
City of Tucker	Government
City of Warner Robins	Government
City of Waynesboro	Government
City of Woodstock	Government
Clayton County Board of Commissioners	Government
Clayton County Government	Government
Clayton County Library	Libraries
Clinch County Government	Government
Clinch Memorial Hospital	Hospitals
Coastal Area Agency on Aging	Organizations that Represent and Support Aging

Entity name	Entity type
	Populations
Coastal Electric Cooperative	Internet Service Provider
Cobb County Government	Government
Coffee Regional Medical Center	Hospitals
Columbia County Government	Government
Columbus Technical College	Community Colleges
Comcast	Internet Service Provider
Communications Workers of America	Labor Unions
Compudopt	Non-profit
Connecting Kids	Non-profit
Cox Communications	Internet Service Provider
Culture Wireless	Internet Service Provider
Dade County Schools	K-12 Schools
Darien Telephone Company	Internet Service Provider
De Soto Trail Regional Library	Libraries
DeKalb County Government	Government
DeKalb Neighborhood Association	Non-profit
Diverse Power	Industry Related Entities
Diversity Cyber Council	Non-profit
Dodge County Government	Government
Dooly County Chamber	Chambers of Commerce
Dougherty County Commission	Government
Dougherty County Government	Government
Dougherty County Public Library	Libraries
Eastman-Dodge County Chamber of Commerce	Chambers of Commerce
Echols County Schools	K-12 Schools
Ellijay Telephone Company	Internet Service Provider
Emanuel County Schools	K-12 Schools
Emory University Medical Center	Hospitals
ETC	Internet Service Provider
Evans County Government	Government
Evans County Schools	K-12 Schools
Fail Telecommunications	Internet Service Provider
Federal Deposit Insurance Corporation	Government
Feiler Park Neighborhood Association	Non-profit
Fiber Broadband Association	Association
Fiber Network Alliance	Association
FiberOptics.com	Industry Related Entities
Flint EMC	Internet Service Provider
Fort Valley State University	HBCUs
FTC	Internet Service Provider
FTE Leaders	Non-profit
Fulton County Government	Government
Garden City	Government
Georgia Building Authority	Government

Entity name	Entity type
Georgia Cable Association	Association
Georgia College and State University	Universities
Georgia Department of Agriculture	Government
Georgia Department of Community Affairs	Government
Georgia Department of Corrections	Government
Georgia Department of Early Care and Learning	Government
Georgia Department of Education	K-12 Schools
Georgia Department of Education-Technology Services	K-12 Schools
Georgia Department of Education-Office of Rural Education and Innovation	K-12 Schools
Georgia Department of Labor	Government
Georgia Department of Public Health	Government
Georgia Department of Public Safety	Government
Georgia Department of Transportation	Government
Georgia Electric Membership Corporation	Internet Service Provider
Georgia Municipal Association	Association
Georgia Partnership for Telehealth	Non-profit
Georgia Piedmont Technical College	Community Colleges
Georgia Public Library Service	Government
Georgia Public Library Service-Blind and Disabled Services	Organizations that Represent and Support People with Disabilities
Georgia Public Safety Training Center	State Public Safety
Georgia Radio Reading Service	Organizations that Represent and Support People with Disabilities
Georgia State Assembly	Government
Georgia State Board of Pardons and Paroles	Government
Georgia System Operations Corporation	Industry Related Entities
Georgia Institute of Technology	Universities
Georgia Institute of Technology-Constellations Center for Equity in Computing	Universities
Georgia's Rural Telephone and Broadband Association	Association
Glenwood Telephone Company	Internet Service Provider
Global Partnership for Telehealth	Healthcare Community
Glynn County Government	Government
Goodwill Industries	Non-profit
Goodwill of North Georgia	Non-profit
Gordon County Schools	K-12 Schools
Governor's Office	Government
Governor's Office of Planning and Budget	Government
Grady EMC	Internet Service Provider
Greater Valdosta United Way	Non-profit
Griffin Spalding Schools	K-12 Schools
Gwinnett County Government	Government

Entity name	Entity type
Gwinnett County Public Libraries	Libraries
Habersham EMC	Internet Service Provider
Hall County Government	Government
Hall County Library	Libraries
Hall County Schools	K-12 Schools
Hart Telephone Company	Internet Service Provider
Healing Bridge Clinic	Non-profit
Henry County Government	Government
Highline	Internet Service Provider
Inspiredu	Non-profit
Inspiritus	Communities Who Have Language Barriers
Irwin EMC	Internet Service Provider
Jackson County Government	Government
Jackson EMC	Internet Service Provider
James Bates Brannan Groover LLP	Industry Related Entities
Jeff Davis Hospital	Hospitals
John Staurulakis, Inc.	Industry Related Entities
Johnson County	Government
Jones County Board of Education	Government
Jones County Family Connection	Non-profit
JSI Telecom	Industry Related Entities
Kajeet	Industry Related Entities
Kendrick Advisory and Advocacy Group	Industry Related Entities
Lee County Government	Government
Live Oak Fiber	Internet Service Provider
Live Oak Public Libraries	Libraries
Lowndes County Government	Government
Lowndes County Schools	K-12 Schools
Macon Black tech	Non-profit
Macon City Mayor	Government
Macon Housing Authority	Public Housing Authorities or Owners of HUD-assisted Housing
Macon Transit Authority	Government
Macon-Bibb Commission	Government
Macon-Bibb County Board of Tax Assessors	Government
Macon-Bibb County Economic Opportunity Council	Economic Development Agencies and Organizations
Macon-Bibb County Government	Government
Macon-Bibb County Transit Authority	Government
Macon-Bibb Economic Development Office	Economic Development Agencies and Organizations
Macon-Bibb Planning and Zoning Commission	Government
Madison County Board of Commissioners	Government
MARTA	State Departments Dealing with Infrastructure (e.g., Transportation)
Meals on Wheels Middle Georgia	Non-profit
Mediacom	Internet Service Provider

Entity name	Entity type
Mercer University	Universities
Microsoft Foundation	Industry Related Entities
Middle Georgia EMC	Internet Service Providers
Middle Georgia Regional Commission	Economic Development Agencies and Organizations
Middle Georgia State University	Universities
Miller County Hospital	Hospitals
Mitchell EMC	Internet Service Provider
Montgomery County Board of Commissioners	Government
Morehouse College	Colleges
Muscogee County Democratic Committee	Non-profit
MUST Ministries	Non-profit
NAACP-Georgia State Conference	Civil Rights Organizations
National Federation of Blind of Georgia	Organizations that Represent and Support People with Disabilities
National Institute of Minority Economic Development	Organizations that Represent and Support Racial and Ethnic Minorities
North Georgia EMC	Internet Service Provider
Northeast Georgia Regional Educational Service	Government
Northwest Georgia Housing Authority	Public Housing Authorities or Owners of HUD-assisted Housing
Northwest Georgia Regional Commission	Economic Development Agencies and Organizations
Northwest Georgia Regional Educational Service Agency	Government
Northwest Georgia Technical College	Community Colleges
Ocmulgee EMC	Internet Service Provider
Oconee EMC	Internet Service Provider
Office of Internet Connectivity & Growth (OICG) National Telecommunications & Information Administration (NTIA)	
OFS	Industry Related Entities
Okefenokee Regional Library System	Libraries
Operation Hope	Non-profit
Outpost Plus	Internet Service Provider
PAC Fiber	Internet Service Provider
Partnership for Inclusive Innovation	Non-profit
Partnership for Southern Equity	Organizations that Represent and Support Racial and Ethnic Minorities
PCs for People Georgia	Non-profit
Pembroke Advanced Communications	Internet Service Provider
Phoebe Health	Hospitals
Pickens County Schools	K-12 Schools
Piedmont Regional Library System	Libraries
Pineland Telco	Internet Service Provider
Planters Broadband Cooperative	Internet Service Provider
Pooler Chamber of Commerce	Chambers of Commerce

Entity name	Entity type
Public Service Telephone	Internet Service Provider
Pulaski County Commission	Government
Quitman County Schools	K-12 Schools
Rabun County Public Library	Libraries
Relyant Communications	Internet Service Provider
Representative – Georgia State Assembly	Members of the State Legislature or their staff
River Edge Behavioral Health Center	Hospitals
River Valley Regional Commission	Economic Development Agencies and Organizations
Rome Floyd Chamber of Commerce	Chambers of Commerce
Rural4g	Internet Service Provider
Satilla REMC	Internet Service Provider
Savannah Chatham Public School System	K-12 Schools
Slash Pine	Internet Service Provider
Social Circle Schools	K-12 Schools
South Georgia Regional Library	Libraries
Southeast Lineman Training Center	Industry Related Entities
Southeastern Technical College	Community Colleges
Southern Oak Advisory	Industry Related Entities
Southern Crescent Technical College	Community Colleges
Southern Georgia Regional Commission	Economic Development Agencies and Organizations
Southern Telecom	Internet Service Provider
Southwest Georgia Regional Commission	Economic Development Agencies and Organizations
Spalding County Government	Government
State Road and Tollway Authority	State Departments Dealing with Infrastructure (e.g., Transportation)
Sumter County Government	Government
Sumter EMC	Internet Service Provider
T-Cubed Thoroughbred Technology and Telecommunications – Norfolk Southern Railroad	Industry Related Entities
TDS Telecom	Internet Service Provider
Technical College System of Georgia	Community Colleges
Technology Association of Georgia (TAG) Bridge Builders	Association
TechSmart for Seniors	Organizations that Represent and Support Aging Populations
Telfair County Commission	Government
Terrell County Schools	K-12 Schools
The Clubhouse/Tech for Success	Non-profit
Thomas County Schools	K-12 Schools
Three Rivers Regional Commission	Economic Development Agencies and Organizations
Thrive Regional Partnership	Non-profit
Toombs County schools	K-12 Schools
Town of Cohutta	Government
Town of Sharpsburg	Government
Town of Toomsboro	Government

Entity name	Entity type
Trailwave Fiber	Internet Service Provider
Trenton Telephone Company	Internet Service Provider
Tri-County EMC	Internet Service Provider
TruVista	Internet Service Provider
Tucker Northlake Community Improvement District	Community Development Groups and Organizations
Turner County Schools	K-12 Schools
United Way of Central Georgia	Non-profit
United Way of the Coastal Empire	Non-profit
United Way of the CSRA	Non-profit
United Way of Greater Atlanta	Non-profit
United Way of Southeast Georgia	Non-profit
United Way of Southwest Georgia	Non-profit
University of Georgia	Universities
University of Georgia-Carl Vinson Institute of Government	Universities
University of West Georgia	Universities
University System of Georgia	Universities
Urban League of Greater Atlanta	Non-profit
US Congressman Rep. Buddy Carter	Congressional Field Representatives
US Congressman Rick Allen	Congressional Field Representatives
US Department of Commerce NTIA	Government
US Senator Warnock	Congressional Field Representatives
Utopian Academy for the Arts	K-12 Schools
Valdosta City Schools	K-12 Schools
Valdosta Times	Industry Related Entities
Verizon	Internet Service Provider
Walker County Government	Government
Walton County Government	Government
Washington EMC	Internet Service Provider
We thrive on Riverside Renters Association	Non-profit
White County Government	Government
Whitesburg City Hall	Government
WideOpenWest	Internet Service Provider
Wilkes Telephone & Electric Co	Internet Service Provider
Windstream	Internet Service Provider
Wiregrass Technical College	Community Colleges
Workforce Evolved	Workforce Development Agencies and Organizations

Appendix G: Public listening session survey responses

As part of its 15 in-person public meetings around the state from February 20, 2023, to March 22, 2023, GTA conducted surveys that respondents could complete on paper or by phone. GTA received 75 survey responses from a total of approximately 300 people who attended the public sessions.

Many different types of organizations attended and responded to the survey, including library systems, K-12 school systems, higher education facilities, local governments, telehealth organizations, non-profits, faith-based organizations, and communications companies.

Survey questions:

1. How important is competition among internet service providers for ensuring the availability of reliable broadband service? (Very important, Somewhat important, Neutral, Somewhat unimportant, Not important at all)

2. Who should be leading the efforts to ensure our residents have the digital skills they need? (state governments, local governments, schools, employers, nonprofits)

3. What do you think is the biggest obstacle to increasing high-speed internet subscriptions in Georgia?

4. Are you satisfied with your internet service connection at your home and/or place of work? If not, please explain why this is. (I.e., price, speed, reliability, lack of quality device to connect to the internet, etc.)

5. What stakeholder organization(s) or group(s) do you want to make sure we include in these broadband engagement meetings?

Asked about the importance of competition among internet service providers for ensuring the availability of reliable broadband service, 57 of the respondents selected the option “very important.” 14 respondents felt that it was “somewhat important.” Only two respondents felt that it was “not important at all,” and one respondent had no opinion.

When asked about who should lead efforts to ensure Georgia’s residents have the digital skills they need, the respondents were provided with five options. The results are as follows:

- State governments: 24
- Local governments: 22
- Schools: 15
- Non-profits: 8

- Employers: 2

Notably, a few paper surveys circled more than one option, and several of these paper surveys circled all the provided options. In addition, four respondents did not select any of the provided options.

Respondents were asked about what they think is the biggest obstacle to increasing high-speed internet subscriptions in Georgia. The most common response among respondents mentioned funding, cost, or price. Some of these responses also detailed that the high cost of reliable internet services made those services inaccessible to low-income residents of Georgia. Respondents also noted that the lack of competition contributed to this barrier.

Several respondents noted that the rurality of communities was an obstacle. These respondents noted that the distance between homes was a barrier to getting these homes connected. Respondents that mentioned rurality as an obstacle also tended to mention the lack of infrastructure as another barrier.

Respondents also noted that lack of digital literacy and devices was a barrier to increasing high-speed internet subscriptions in Georgia. These respondents mentioned that educating Georgia citizens on both the value and the uses of high-speed internet services would be beneficial to getting these citizens connected.

Respondents were asked if they were satisfied with their internet services both at home and at work. Responses to this question varied widely. Some were completely satisfied both at home and at work, some were satisfied with the internet service at one location but not the other, and some were not satisfied with services at either location. Others noted that they were satisfied with the service at both locations but knew of someone who was not satisfied, or that they were dissatisfied with the community's internet service in general. Some noted that while they were satisfied, this satisfaction came at a high end-user cost. Finally, respondents who were completely satisfied at both locations noted that they lived in metropolitan areas; those who were dissatisfied noted that they lived in rural areas.

Of these respondents, 4 were satisfied only at home, 1 was satisfied only at work, 27 were satisfied both at home and at work, and 21 were dissatisfied at home and at work.

Responses also varied widely when presented with the question, "What stakeholder organization(s) or group(s) do you want to make sure we include in these broadband engagement meetings?" Respondents tended to mention stakeholder groups that were related to their own organizations. For example, library systems tended to mention public libraries, and school systems tended to mention local and state boards of education. Some respondents mentioned

stakeholder groups they thought GTA could have missed including farmers, faith-based organizations, small businesses, youth representation groups, military/veteran communities, non-English speakers, centers related to aging (nursing homes, senior centers, councils on aging), state-run behavioral health services, homeowner associations (HOA), social service providers, healthcare providers, and community cultural centers. Specific organizations mentioned included: NAACP, Urban Outreach Association, Spalding Emergency Agency, SOWEGA Council on Aging, Georgia Department of Education, Altamaha EMC, Techbridge, Boys and Girls Club of America, and the Georgia Piedmont Technical College.

Appendix H: Organized sequence of subgrantee selection process

The following table organizes the documents required from GTA and from the subgrantee at different points in the subgrantee selection process (see Section 5). The table is an organized visualization of the process, not a full accounting of the details of each required document.

Table 17: Chart of subgrantee selection process documents and milestones

Phase	GTA provides	Subgrantee provides	
		Brief description	Section of this Initial Proposal
Completion of Challenge Process			
NTIA Challenge Process Validation			
Eligible Locations Percentage Determination Process			
Preparatory	Application materials (Application, Program Guide, County Grant Areas FAQ documents, model letter of credit, sample engineer certification, list of required licenses and certifications)		
	Template for detailing other public funding		
	Template for budget narrative, proposed budget, and business case analysis		
	Technical Specifications Template, Project Timeline Template		
	Website information (also directing to third-party resources)		
	Online application workshop and workshop materials		
	Continual updates to FAQ document as questions are received and answered		

Phase	GTA provides	Subgrantee provides	
		Brief description	Section of this Initial Proposal
Grant submission window opens			
Scoring	Dedicated email address for questions and technical assistance	Unqualified audited financial statements from the last year	5.3.1 5.12.3
	Continual updates to FAQ document as questions are received and answered	Certification by officer or director: That it has financial resources to and qualifications to successfully complete program requirements and complete the specific project with reimbursement model; that it has financial resources to provide pledged matching funding; that it has financial resources to support all costs of the specific project, even if it exceeds the grant award and matching funds	5.3.1 5.12.1
	Updates and reminders on milestones, deadlines, or technical resources as they come up	Resumes of management staff, CTO, contractor oversight team, and other key personnel; and description of their expected roles in a BEAD-funded project	5.3.1 5.12.5.1
		Certifications and licenses of the organization, the officer or director, management staff, contractor oversight team, and key technical personnel; and certification of processes and resources to employ continued skilled, credentialed workforce	5.3.1 5.12.6.1 5.12.6.2
		Description of planned contractors and consultants, and certification that any future contracted resources will have the relevant and necessary skills	5.3.1 5.12.5.3
		Descriptions of managerial	5.12.5

Phase	GTA provides	Subgrantee provides	
		Brief description	**Section of this Initial Proposal**
		capability connected to unique needs of specific proposed project	
		List of job categories, titles, and descriptions to complete the specific project; certifications or licenses necessary for the specific project; demonstration of completion of requirements to be qualified for the project	5.12.6.4
		Organizational chart and narrative description of Applicant's processes and structure	5.3.1 5.12.5.2
		Narrative description of the Applicant's experience, resources, and readiness in managing and carrying out this broadband project, referencing key personnel	5.12.5.3 5.12.6.3
		Certification of history of providing telecommunications or electric service	5.3.1 5.12.8.1
		Certification of FCC Form 477s and Broadband DATA Act submissions **OR** Qualified operating or financial reports and certification that submission is accurate	5.3.1 5.12.8.2 5.12.8.3
		Legal opinion from legal counsel attesting to preparation for compliance to all applicable laws for BEAD-funded projects	5.3.1 5.12.7
		Narrative description of processes in place to conduct funding activities in compliance	5.12.7

Phase	GTA provides	Subgrantee provides	
		Brief description	Section of this Initial Proposal
		with federal and state law, including procurement practices	
		Ownership information, including ownership structure, corporate entity type, and other information, referencing and corresponding to other information provided	5.3.1 5.12.9
		Certification of history of compliance and of intention to comply with environmental and historic preservation requirements and BABA	5.6
		Certifications: Of cybersecurity risk management plan; that the plan reflects NIST framework and EO 14028; and that the plan will be updated periodically; and that the plan will be submitted to GTA	5.3.1
		Certifications: Of supply chain risk management plan; that supply chain plan reflects NISTIR 8276 and other guidance including NIST 800-161 and specifying the controls being implemented; and that the plan will be updated periodically; and that the plan will be submitted to GTA	5.3.1
		List of present or planned applications to federal or state broadband funding, and of every broadband deployment project the Applicant is undertaking or will undertake, with details on each project, using GTA template	5.3.1 5.12.10
		Materials on Fair Labor Practices	5.3.1

Phase	GTA provides	Subgrantee provides	
		Brief description	Section of this Initial Proposal
		and compliance (including certification of compliance with labor and employment laws; yearly recertification of labor and employment practices; discussions of workforce plans, commitments, and development; compliance with workplace safety and processes to monitor and support future compliance)	5.12.7 8.1
		Documentation of communications with and outreach to workers and worker representative labor organizations	5.12.7
		Certification of worker-led health and safety committees	5.3.1 5.12.7
		Detailed description of specific proposed project, including network design, descriptions of location and community, descriptions of technical specifications, timelines and milestones, and documentation of costs	5.12.6.5
		Budget narrative and proposed budget using GTA templates, specifying expenses, team responsible for each expense, and relation to project objective	5.12.4
		Business case analysis using GTA template, involving take rates, churn, revenue, cash flow, expenditures	5.12.4
		Certification of the project by independent professional	5.12.6.6

Phase	GTA provides	Subgrantee provides	
		Brief description	**Section of this Initial Proposal**
		engineer	
		Certifications: of awareness of letter of credit obligations; of qualifications and resources to obtain letter of commitment and letter of credit from financial institution for no less than 25 percent of award	5.12.2
		Letter of commitment from qualified financial institution describing the institution, stating that they stand ready to issue a letter of credit for the proposed project and specified amount, and stating that it has reviewed the model letter and is prepared to comply with terms	5.12.2
Grant submission window closes			
	Scoring, according to guidelines in 5.3.2 and 5.3.3		
	Curing, as necessary		
Negotiation Phase opens			
Negotiation	Counteroffers to negotiate pricing and proposal area boundaries, if needed		
	If necessary, second phase grant window for remaining needs		
	Curing, as necessary		
Negotiation Phase closes			
Finalization	Announcement of provisional determinations, subject to NTIA approval	Irrevocable standby letter of credit from financial institution	5.12.2
	Submission of Final	Bankruptcy opinion letter from	5.12.2

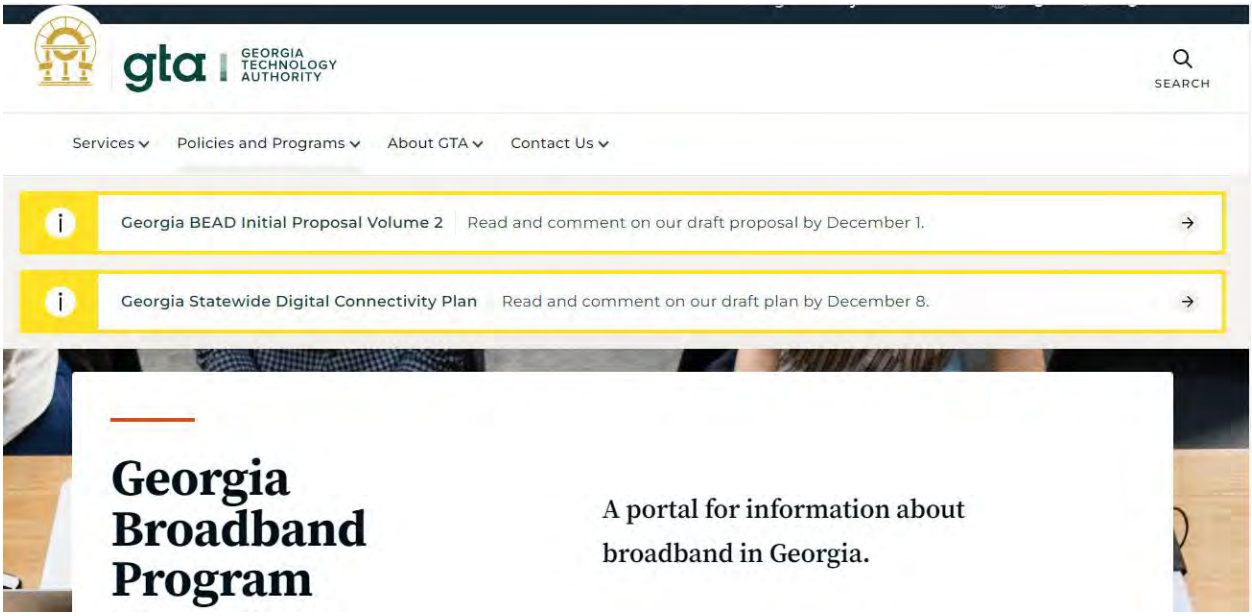
Phase	GTA provides	Subgrantee provides	
		Brief description	Section of this Initial Proposal
	Proposal to NTIA	legal counsel confirming proceeds from letter of credit are not "property"	

Appendix I: Proposed Scoring Rubric for Subgrantee Selection Process

The final expanded proposed scoring rubric will be included in this Appendix in the version of this Initial Proposal that is submitted to NTIA. It will fulfill NTIA's full guidance and take the NTIA scoring rubric template as a model. See Section 5.3.3 for more details.

Appendix J: Public comment posting

As described in Section 18, GTA made the Initial Proposal Volume II available on its website for public comment for a period of 30 days. Screen captures of the posting, including a website banner directing visitors to review the Proposal, are included below.



BEAD Program

The Georgia Technology Authority (GTA) is assisting the Governor's Office of Planning and Budget (OPB) to expand broadband across the state, supporting every Georgian's access to highspeed, reliable internet.

GTA is currently in the planning phase for more than $1.3 billion in grant funds from the National Telecommunications and Information Administration (NTIA) Broadband Equity, Access, and Deployment (BEAD) Program. These dollars will be used to support broadband grants to serve remaining unserved and underserved locations in Georgia.

Initial Proposal

To access BEAD funds, the state must first develop a detailed plan, referred to as an Initial Proposal, that demonstrates how, at a minimum, all unserved locations in the state will be connected to broadband by the end of the BEAD Program. NTIA will review this plan, and once approved, GTA and OPB may begin implementation. GTA is developing the Initial Proposal in two volumes.

Volume 2

The **Initial Proposal Volume 2 (https://drive.google.com/file/d/14bTxEmMIa1RKIsSWhncxZrHtz1IsYshr/view?usp=sharing)**describes how Georgia will distribute its allocated BEAD funds to achieve Georgia's objectives in compliance with state and federal requirements.

Watch the November 8 public comment webinar recording below

Share your feedback (https://gta.georgia.gov/georgia-initial-proposal-volume-2)

You're encouraged to provide feedback during the public comment period (ending December 1) about Georgia's deployment subgrantee selection process.

FILL OUT THE COMMENT FORM → (HTTPS://GTA.GEORGIA.GOV/GEORGIA-INITIAL-PROPOSAL-VOLUME-2)

Volume 1

GTA has submitted this **Broadband Equity, Access, and Deployment (BEAD) Initial Proposal Volume 1 (https://drive.google.com/file/d/11yQLusmsI9MpLbx3VRvgZ1LQHoSh3JxG/view?usp=sharing)** to NTIA for guidance and feedback.

Appendices

Appendix 1 (https://docs.google.com/spreadsheets/d/1700m7qhp8-6wqHseHdMoyYEvVNaCyfcG/edit?usp=sharing&ouid=100684365079004075622&rtpof=true&sd=true)
Descriptions of existing funding for broadband in Georgia

Appendix 2 (https://docs.google.com/spreadsheets/d/1-bz2Fx-6jvt7lhxmNjuiQ0Wk5tYsihpd/edit?usp=sharing&ouid=100684365079004075622&rtpof=true&sd=true)
Location ID numbers of all **unserved** locations

Volume 2

The Initial Proposal Volume 2 describes how Georgia will distribute its allocated BEAD funds to achieve Georgia's objectives in compliance with state and federal requirements.

Watch the November 8 public comment webinar recording below.


Share your feedback
You're encouraged to provide feedback during the public comment period (ending December 1) about Georgia's deployment subgrantee selection process.
FILL OUT THE COMMENT FORM