

Federal Award ID Number	02-20-B066
Grant Request Number	GRN-000066
Funding Program Name	Broadband Equity Access and Deployment (BEAD) Program
Funding Request Name	Alaska-BEAD-Final Proposal-Programmatic
Applying Organization	AK DEPARTMENT OF COMMERCE COMMUNITY ECONO
Applicant Name	Lisa Von Bargaen

1.1 Subgrantee Selection Process

Describe how the Eligible Entity's deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice.

Following the release of the BEAD Restructuring Policy Notice (Notice) on June 6, 2025, the ABO revised the Alaska Broadband Grant Program (Grant Program) Notice of Funding Opportunity (NOFO) to be consistent with the requirements of the Notice. The updated Grant Program NOFO was released, and the application Portal was reopened on July 3, 2025.

The ABO accepted applications from all applicants on an equal basis. The Grant program did not exclude or provide special dispensation for any class or type of applicant. No subgrantee selection was initiated or completed by the ABO prior to the release of the Notice. The application period closed on August 3, 2025.

The ABO followed a two-stage application review and scoring procedure consistent with Alaska's approved IP Volume II, in compliance with 2 CFR § 200, and revised to meet the requirements of the Notice.

Stage 1: Minimum Qualifications (MQs):

MQs were evaluated on a PASS/FAIL basis with all elements required for applicants to receive a PASS. A FAIL in any of the following categories rejected an application such that it did not move on to Phase 2: Scoring. Alaska's Grant Program originally had 15 MQs. As indicated below, five MQs were deleted to bring the Grant Program into compliance with the Notice.

- Criterion 1: Applicant License and Registration Information
- Criterion 2: Organizational and Managerial Capability
- Criterion 3: Financial Capability
- Criterion 4: Other Public Funding Disclosure – Deleted to Comply with BEAD Policy Notice
- Criterion 5: Technical Capability
- Criterion 6: Project Sustainability – Deleted to Comply with BEAD Policy Notice
- Criterion 7: Compliance with Applicable Federal, State, and Local Laws

Criterion 8: Civil Rights and Nondiscrimination Law Compliance – Combined with Criterion 7 and Deleted to Comply with BEAD Policy Notice
Criterion 9: Cybersecurity and Supply Chain Risk Management (C-SCRM)
Criterion 10: Weather/Climate/Natural Hazard Threat Assessment and Mitigation Plan – Deleted to Comply with BEAD Policy Notice
Criterion 11: National Environmental Policy Act (NEPA) Requirements
Criterion 12: Indian Tribe/Tribal Entity Proof of Support
Criterion 13: Low-Cost Service Option – Modified to Comply with BEAD Policy Notice
Criterion 14: Middle Class Affordability – Deleted to Comply with BEAD Policy Notice
Criterion 15: Application and Grant Agreement Certification

Stage 2: Scoring

To be consistent with the Notice, the ABO completely revised the Grant Program Scoring Matrix. Supra-Scoring (an application either was selected or was moved to Primary Scoring): Supra-Scoring for Priority Broadband Projects was determined as follows:

Priority Broadband Project Speeds

In conformance with the BEAD Restructuring Policy Notice Section 3.1 and the Grant Program NOFO Section 3, "...a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, and has a latency less than or equal to 100 milliseconds..."

Priority Broadband Project Scalability Benchmarks

In conformance with the BEAD Restructuring Policy Notice Section 3.1 and the Grant Program NOFO Section 3, "...in order to ensure equal access to broadband by all Alaskans, a project that can easily scale speeds as determined by FCC Broadband Benchmarks over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services."

Priority Broadband Project Assessing Excessive Cost

Initially, a project would be assessed for excessive costs by determining if, when taken with all other Priority Broadband Projects and non-Priority Broadband Projects, the total amount for all projects exceeded the usable allocation of the Broadband Equity, Access, and Deployment (BEAD) allocation for Alaska. If this occurred, the ABO would take all projects, sum them and sort them by cost/BSL passed, and if the total amount of requested funds exceeded the usable allocation, the highest cost/BSL would be moved to BSLs requiring secondary negotiation or excessive cost elimination. This process would repeat moving down from the highest cost/BSL projects until the overall costs were below the usable allocation. The ABO received subsequent guidance from the NTIA that there would be a fixed number above which projects would not be considered without extraordinary justification. The ABO evaluated the projects that came in and set the excessive cost threshold at \$120,000/BSL based on the justifications associated with each project.

Supra-Scoring Award Determinations

If an Applicant's application was the only "Priority Broadband Project" to pass the three scoring elements defined in this Supra-Scoring subsection, then the Priority Broadband Project was awarded to the Applicant with no other scoring evaluated. Otherwise, scoring moved to Primary Criteria Scoring.

Primary Criteria Scoring (an application either was selected or was moved to Secondary Scoring). If no Priority Broadband Projects were selected for a specific BSL, and there were multiple Applicants, the Scoring Committee selected the combination of project proposals with the lowest overall cost to the BEAD Program.

For each BSL from the applications where the Applicant has provided a cost/BSL in bullet two of Criterion 5, Section 5.1.3. of the Grant Program NOFO, the Scoring Committee evaluated the cost/BSL. If applications that proposed to serve the same BSL arrived at a cost/BSL within 15% of the lowest cost proposal received for that same BSL, the Scoring Committee evaluated the competing applications based on the three criteria in Secondary Criteria Scoring. Otherwise, the lowest cost/BSL application was selected for that Project Area.

Secondary Criteria Scoring (100 Points Total) Speed to Deployment (10 of 100 Points)

Applicants identified the timeline to provide service to 100% of the Project Area. Any Applicants with a timeline that exceeded 48 months received a score of 0.

This section was scored by the reviewer, assigning for each project 10 points to the Applicant who demonstrated the fastest speed to deployment. All other Applicants for the project received 9 points. In the case of a tie for the fastest speed to deployment for the project, all tied Applicants received 10 points, and all others received 9 points.

Speed of Network and Other Technical Capabilities (90 of 100 points)

Applicants were required to certify the speed, latency, and other technical capabilities as described below:

Speed (60 Points)

To ensure equal access to broadband by all Alaskans, download speed must be equal to or better than the current benchmark goal, as published by FCC Broadband Benchmarks over time. If an Applicant committed to immediately providing equal or better service in their Portal submission, all points were awarded; if not, no points were awarded. The ABO had the consulting Professional Engineer evaluate and determine whether each network in an application can: 1. reach the current FCC scalability benchmark goals, and 2. meet an estimated growth over the next four years.

Latency (10 Points)

Ability to meet the FCC's Broadband monitoring criteria "The 80/80 rule" (Footnote 1). If an Applicant committed to immediately providing monitoring based on the FCC's Measuring Fixed Broadband – Eleventh Report, all points were awarded; if not, no points were awarded. The Scoring Committee assigned full points for all Applicants who committed to meet the FCC's monitoring criteria and 0 points for those Applicants who did not.

Other Technical Capability (20 Points)

The Applicant that provided a Low-Cost Service Option of 100/20Mbps with less than 100ms latency with the lowest monthly cost with a commitment to maintain the price for the useful life of the network assets received 100% of the points in this subcategory. All other Applicants received 0 points. The Scoring Committee compared the rates from Criterion 13 of the Grant Program for each Project Area and used the lowest rate as the basis for selection.

Post Subgrantee Selection Risk Assessment

To ensure compliance with 2 CFR § 200, the ABO has completed a Risk Assessment of each provisionally selected subgrantee.

The Risk Assessment includes the following categories:

1. Administrative Capabilities
2. Staff Turnover
3. Financial System
4. Audit Results
5. Experience with Similar Awards
6. Federal Agency Monitoring
7. Total Grantee Funding
8. Subcontracts

Footnote 1: The service characteristics outlined in the proposed plan must include speeds and latency requirements that are in accordance with the FCC's 80/80 metric. That is, if the ABO or any other entity assigned by the ABO tests the end user speeds of these plans, the requirements will only be met if 80% of the tests meet or exceed 80% of the required speeds and 95% of latency measurements must be at or below 100 milliseconds round trip. For instance, if the ABO runs 100 speed tests at a selection of broadband service plans, then at least 80 of those speed tests must meet 80% of the speed requirements and 95 latency measurements must meet requirements. For the purposes of these specifications, "typical" download or upload speeds mean that 80% of speed tests must demonstrate at or above 80% of such speeds. Furthermore, 95% of latency tests must demonstrate no more than 100 milliseconds of latency.

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Latency (30 Points)

Ability to meet the FCC's Broadband monitoring criteria "The 80/80 rule" (Footnote 1). If an Applicant committed to immediately providing monitoring based on the FCC's Measuring Fixed Broadband – Eleventh Report, all points were awarded; if not, no points were awarded. The Scoring Committee assigned full points for all Applicants who committed to meet the FCC's monitoring

criteria and 0 points for those Applicants who did not.

Other Technical Capability (0 Points) N/A

Footnote 1: The service characteristics outlined in the proposed plan must include speeds and latency requirements that are in accordance with the FCC's 80/80 metric. That is, if the ABO or any other entity assigned by the ABO tests the end user speeds of these plans, the requirements will only be met if 80% of the tests meet or exceed 80% of the required speeds and 95% of latency measurements must be at or below 100 milliseconds round trip. For instance, if the ABO runs 100 speed tests at a selection of broadband service plans, then at least 80 of those speed tests must meet 80% of the speed requirements and 95 latency measurements must meet requirements. For the purposes of these specifications, "typical" download or upload speeds mean that 80% of speed tests must demonstrate at or above 80% of such speeds. Furthermore, 95% of latency tests must demonstrate no more than 100 milliseconds of latency.

1.2 Fair, Open, Competitive Subgrantee Selection

Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

Both the original release of the Grant Program NOFO in December 2024, and the re-release of the NOFO in July 2025, were posted on the ABO website and notice was sent by listserv email to the over 700 registered recipients. In addition to the web-portal application submittal option, the ABO made provisions to allow submission of paper applications by mail. This measure was established to ensure prospective applicants without access to high-speed internet had equal opportunity to apply. Following the initial release of the Grant Program in December 2024, the ABO held Tribal and non-Tribal technical assistance sessions in person and virtually to assist with the application process.

During the official Grant Program "pause" beginning in March 2025, the ABO held two virtual listening sessions to answer questions and take input from prospective applicants regarding program changes anticipated to be forthcoming with updated NTIA guidance.

Upon re-release of the Grant Program NOFO on July 3, 2025, the ABO engaged in a robust Frequently Asked Questions (FAQs) process. Instructions were posted on the ABO website to encourage prospective applicants to submit questions by email or phone. The ABO developed an internal policy to ensure accurate and timely responses to inquiries. All prospective applicants had equal access to all questions and answers, as FAQs were updated twice weekly (Wednesdays and Fridays) on the ABO website during the application period.

From the re-release of the Grant Program NOFO on July 3, 2025, to the application due date on August 3, 2025, the ABO deliberately refrained from any virtual or in-person meetings with prospective individual, or classes of, applicants.

The ABO developed an Application Review and Scoring Procedure. The procedure outlined each aspect of the review and scoring process, including Scoring Committee Assignments and Outputs associated with each review or scoring activity.

The ABO required technical expertise for the engineering and NEPA evaluations of the Grant Program applications. Consulting services were procured through competitive solicitation following State of Alaska procurement guidelines.

Each member of the Scoring Committee completed an Alaska Broadband Grant Program Conflict of Interest Affidavit filed with the Ethics Officer for the Department of Commerce, Community, and

Economic Development.

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Additional Detail for Subsection 1.2.

1. Training processes: Each member of the Scoring Team was provided with a copy of the Alaska Grant Program Notice of Funding Opportunity, ABO Procedure 3.0 Application Review and Scoring, and the Review and Scoring Matrix, followed by one-on-one consultations with the Director of Broadband concerning the requirements for each. Copies of these documents are available upon request. Additionally, the staff of the Alaska Broadband Office, who also served on the Scoring Team, routinely participate in Procurement and Alaska Executive Branch Ethics Act trainings which includes specific guidance regarding recognition and prevention of bias, bad faith, conflict of interest, collusion, and other forms of waste, fraud, and abuse. Division of Community and Regional Affairs grants administration staff who also served on the Scoring Team routinely participate in these trainings as well.

And, finally, the designated Ethics Officer for the Department of Commerce, Community, and Economic Development (DCCED), of which the Alaska Broadband Office is a division, has provided ethics training to the ABO staff during meetings of the Statewide Broadband Advisory Board. This training includes the requirements of the Executive Branch Ethics Act, AS 39.52 et seq., which requires all state employees to disclose all potential conflicts of interest and failure to disclose can subject those employees to criminal and civil penalties.

2. Documenting findings: Each reviewer used the Review and Scoring Matrix pre-populated with specific prompts and questions for each subcategory of all minimum qualifications and scoring elements of the Alaska Broadband Grant Program application. The Review and Scoring Matrix included a justification requirement for each element for which Scoring Team members identified how they arrived at the pass/fail or scoring determinations. A copy of the Matrix can be made available upon request.

3. Maintaining consistency between reviewers: Consistency was maintained because there was no overlap by reviewers. Members of the Scoring Team were assigned specific sections to review. The reviews were conducted using ABO Procedure 3.0 Application Review and Scoring, and the Review and Scoring Matrix. For example, the ABO's environmental consultant completed all the Environmental and Historical Preservation (EHP) evaluations to determine if applicants had provided the information required by the Grant Program NOFO and application. As a second example, the Deputy Director of Broadband was responsible for determining if all applicants met the minimum requirements for submitting a Letter of Credit or Performance Bond. The results of each review were uploaded into a master spreadsheet used by the Director of Broadband to document minimum qualifications pass or fail status and scoring.

4. Mitigating conflicts of interest:

- a. Alaska Statute 39.52, the Alaska Executive Branch Ethics Act, prohibits conflicts of interest.
- b. Alaska Administrative Manual 81.470, Procurement, prohibits employees from engaging in activities that demonstrate bias, bad faith, or constitute conflicts of interest.
- c. The Grant Administration Manual for the Division of Community and Regional Affairs, with which the ABO has a Reciprocal Services Agreement to provide grant administration services, includes guidance on avoiding conflicts of interest.
- d. Each ABO staff member, who also served on the Scoring Team, was required to review potential conflicts of interest specific to BEAD and the Alaska Broadband Grant Program and complete, sign, and submit a Conflict-of-Interest Determination Form. Copies of the Determination

Forms can be provided upon request.

e. The Scoring Team included two consultants, one each for engineering and environmental protection. The professional service contracts include conflict of interest requirements that were agreed to and adhered to by the consultants.

f. Article 16 (Conflict of Interest) of Attachment C (Standard Provisions) of the Alaska Broadband Grant Program Grant Agreement prohibits conflicts of interest and requires mitigating activities consistent with 2 CFR § 200.318(c) and 2 CFR § 200.112 as follows:

“No officer or employee of the Department; no member, officer, or employee of the Grantee or its designees or agents; no member of the governing body of the jurisdiction in which the Project is undertaken or located; and no other official of such locality or localities who exercises any functions or responsibilities with respect to the Project during his or her tenure, shall have any personal or pecuniary gain or interest, direct or indirect, in any contract, subcontract, or the proceeds thereof, for work to be performed in connection with the Project assisted under this Agreement.

The Grantee shall incorporate, or cause to incorporate, in all such contracts or subcontracts, a provision prohibiting such interest pursuant to the purpose of this provision. The Grantee shall also disclose in writing any potential conflict of interest to the Department. Grantee understands and agrees it must maintain a conflict-of-interest policy consistent with 2 CFR § 200.318(c) and that such conflict-of-interest policy is applicable to each activity funded under this Agreement. Grantee must disclose in writing to the Department any potential conflict of interest affecting the Grant Award in accordance with 2 CFR § 200.112.

Grantee shall disclose all violations of federal and state criminal law involving fraud, bribery, and gratuity violations. Such disclosures shall be reported by Grantee to the Department within 10 days of Grantee receiving notice of the violation.”

5. Mitigating instances of collusion:

a. Alaska Statute 45.50.562 prohibits collusion by establishing “any contract, combination in the form of a trust or otherwise, or conspiracy, in restraint of trade or commerce, is unlawful.”

b. Administrative Manual 81.470, Procurement, prohibits employees from engaging in activities that demonstrate bias, bad faith, or constitute conflicts of interest.

c. The Executive Branch Ethics Act, AS 39.52 et seq., prohibits a public officer from using, or attempting to use, an official position for personal gain, and may not intentionally secure or grant unwarranted benefits or treatment for any person.

6. Fair curing process: The application curing period opened on August 11, 2025, and closed at 12:00 pm Alaska time on August 13, 2025. An advisory letter which listed these dates was sent on August 11 to the key contacts of all applicants in the DCRA Grants portal. Concurrent with the advisory letter being sent out, DCRA grant administration staff opened all submitted applications in the DCRA Grants portal for applicants to have the ability to review and, if they chose, revise. Grant Program applicants were responsible for reviewing their submittal to cure any deficiencies within their application(s). The advisory letter specified that applicants could only modify their submitted applications as necessary to bring them into compliance with the Criterion requirements as stated in the application and NOFO. Modifications were required to be made in the DCRA Grants portal, and applicants who made modifications were required to also complete an Excel spreadsheet, for which a template was provided, that identified areas of the application that were modified. Along with this advisory letter, the ABO provided a table that identified common issues where applications had failed to meet the Criterion requirements. The list provided was not exhaustive, but it provided examples of deficiencies that the ABO had discovered in its initial application reviews. Upon completion of cures, applicants were able to resubmit their application along with the modification

Excel log in the DCRA Grants portal. Once the deadline to submit curing responses closed August 13, 2025, no additional information was able to be provided by any applicant. All applicants had identical opportunity and timeframe by which to submit cures. Following the cure period, ABO and DCRA staff confirmed the completeness of application cures in conformance with the Grant Program Notice of Funding Opportunity (NOFO).

7. Fair and transparent deconfliction process: While there were numerous applications that had the potential for conflicts, most were not valid applications. If applicants did not meet the minimum qualification criteria, as required by the NTIA BEAD NOFO and the Alaska Broadband Grant Program NOFO, then the applications were not considered valid applications and did not move forward to the scoring section where the deconfliction would occur. During the ABO's review, there were only two valid applications that potentially required the ABO to engage in a deconfliction process. Both applications had an overlap of BSLs in Anchorage, and both applications were determined to be Priority Broadband Projects. This moved the applications on to Primary Scoring where the ABO compared them to see if they were within 15% of each other in pricing. They were not. As a consequence, the conflicted BSLs were awarded to the lowest bid application and removed from the suite of BSLs of the second application. The ABO followed the Initial Proposal Volume II scoring rubric, as modified by the June 6 BEAD Restructuring Policy Notice. All applicants had an opportunity to cure their application(s) as described in question 6.

1.3 No Applications

Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal.

In its Initial Proposal Volume 2, Section 02.04.07 (Coverage for Locations with No Proposals) response, the State of Alaska included a seven-step procedure to address the circumstance if no, or no valid, proposals were received for specific locations. The ABO revised the procedure (outlined below) to be in conformance with the Notice.

Specific process to secure a prospective subgrantee to serve a PDPA or sub PDPA with reliable broadband technology with no bids in the first round:

1. Following the close of the Alaska Broadband Grant Program application window, the ABO will post on its website a list of BSLs that received no applications, or no valid applications, and will, in the manner described in Section 02.04.01. of Alaska's IPV2, conduct general outreach to all potential subgrantees to ensure they are aware of the BSLs in question.
2. The ABO will also conduct targeted individual outreach to any provider that applied for other BSLs within the PDPA or adjacent PDPAs to make them aware of the opportunity. To the extent that there is a successful subgrantee for a portion of the PDPA, or adjacent PDPAs, the ABO will also conduct targeted individual outreach to these entities.
3. The ABO will give prospective subgrantees that are potentially interested in serving these PDPAs or BSLs a defined number of business days to request a one-on-one meeting with the ABO to discuss the opportunity to serve the PDPAs or BSLs.
4. During these one-on-one meetings, the ABO may discuss any failures in the potential subgrantee application, information not identified in the potential subgrantee's application, cost, speed to deployment, scalability and other pertinent information.
5. If one, or if multiple, potential subgrantees offering a valid solution become interested, the ABO will conduct a back-and-forth negotiation process for the PDPAs or BSLs without bids to solicit offers and make counteroffers to ensure the best application is selected. The ABO may also consider an additional round of bidding.
6. Following negotiations with interested potential subgrantees, the ABO will require the

selected subgrantee to submit the application information, including technical information, for review and approval before a provisional award is made.

7. If negotiations are not successful and the ABO has exhausted all options for PDPAs or BSLs with no valid applications, the ABO will reclassify them as excessive cost BSLs (NTIA Reason Code 7.X).

Following completion of the subgrantee selection process outlined in section 1.1 of this document, the ABO sent out letters on September 9, 2025, to all applicants to notify them that they had been provisionally selected for a grant award or that they had not been selected for a provisional grant award due to either failure to adhere to the Grant Program NOFO application requirements, a determination that their application had an excessive cost per BSL, or both. All letters included a set of paragraphs that notified applicants of the remaining BSLs for which no, or no valid, applications were received, with instructions for those interested to contact the ABO within three days by email to set up a one-on-one negotiation meeting with the ABO for the week of September 15-19. These instructions and the list of BSLs for which no provisional award had been made were also posted publicly on the Alaska Broadband Office website on September 9.

The ABO received meeting requests from 20 entities, 18 of which were applicants and two of which were new prospective providers. The ABO scheduled negotiation meetings with all interested on a first-come, first-served basis. The meetings were held between September 11 and September 22. Topics of discussion included speed to deployment, cost/BSL, FCC metrics, scalability, and, if the prospective subgrantee was an unsuccessful applicant to the Grant Program, specific application deficiencies and the applicant's plans to remedy deficiencies.

Applicants and new prospective providers were required to submit technical information related to their proposal to serve all or a portion of the remaining BSLs. The ABO reviewed this information and, while not fully employing the rubrics from the grant application process, the ABO made final subgrantee selections for priority and non-priority broadband projects.

1.4 CAI Revisions

If applicable, describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

Alaska's previously approved CAI list included community service organizations unique to the state:

1. Community Gathering Location
2. Non-Profit Support Organization
3. Shelter
4. Specific Local, Tribal, and State Government Facilities
5. Washeteria
6. Youth Support Organization

The Alaska Broadband Office used the statutory definition of Community Anchor Institutions combined with the new definition of community service organization and removed from the list all CAI locations identified within the groups listed above. Organizations located in government owned facilities that provide publicly accessible Internet service and currently offer digital skills training were retained on the CAI list.

Following this exercise, Alaska's list of eligible CAIs was reduced from 1,677 to 904. The updated

CAI list was published on the ABO website on July 3, 2025, as Appendix I (Unserved and Underserved BSLs and CAIs by Pre-Determined Project Area) to the updated Grant Program NOFO.

1.5 Records Retention Certification

Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

Yes

3.1 Timeline of All BEAD Grant Activities

Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

a. Attachment A (Scope of Work) of Alaska's Grant Program Agreement includes the following language titled Deployment Requirements:

"Grantee will demonstrate compliance with the requirement that Funded Networks begin providing broadband service to each customer that desires broadband service not later than four years after the date on which the Grantee receives the Grant for the applicable Funded Network. The Buildout milestones are identified in the Grantee's Milestone Plan which must be provided to the Department prior to signing this Agreement. Reporting on the plan progress will be reported through semi-annual reporting as identified in Section 4 of Attachment A. Grantees are expected to demonstrate the Project is making reasonable progress toward meeting the four-year deployment deadline. The Department may withhold funds if it determines the Project is not demonstrating reasonable progress related to the requirements of Attachment A, Section 4 hereof."

b. Section III on the signature page of Alaska's Grant Program Grant Agreement identifies the "End of Term" as four years out from the date the Grant Agreement is signed, and states, "The eligible costs under this Agreement begin [date Grant Agreement is signed] ("Effective Date") and shall be completed with all costs paid and deliverables received no later than [four years out from the date the Grant Agreement is signed] ("End of Term")."

c. The ABO estimates all Grant Agreements will be signed within the first calendar quarter of 2026, making the latest "End of Term" March 30, 2030. Alaska's BEAD grant period of performance ends on June 30, 2032. That is a 27-month period – well more than the required 120 days.

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Additional Detail for Subsection 3.1.c.

The ABO affirms that all programmatic BEAD grant activities will be completed by the end of the period of performance of the award. Alaska's programmatic activity is Subgrantee completion of all projects awarded under the Alaska Broadband Grant Program. The ABO estimates all Grant Agreements with Subgrantees will be signed within the first calendar quarter of 2026. The "End of Term" for all Grant Agreements is "four years out from the date of the Grant Agreement is signed." All Subgrantee project activity is contractually obligated to be completed by the end of the first

quarter of 2030. On the rare occasion a one-year extension for a project is approved by NTIA, it will be completed by the end of the first quarter of 2031. Alaska's BEAD grant period of performance ends on June 30, 2032.

4.1 Public Waste, Fraud, and Abuse Hotline

Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

No

4.2.1 Oversight and Accountability - BEAD Program Monitoring Plan

(1) BEAD program monitoring plan;

SOA Final Proposal - Appendix A - BEAD Progra-10-15-2025 08-41-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf

4.2.2 Oversight and Accountability - Agency Documentation

(2) Agency policy documentation which includes the following practices:

- a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and
- b. Timely subgrantee (to Eligible Entity) reporting mandates.

SOA Final Proposal - Appendix A - BEAD Progra-10-15-2025 08-42-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf

4.3 Subgrant Agreement Certification

Certify that the subgrant agreements will include, at a minimum, the following conditions:

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

Yes

5.1 Local Coordination - Public Comment

Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed the comments.

The draft Final Proposal, data tables, and Provisional Subgrantee Selection was posted on the ABO website on September 24, 2025, for a Public Comment Period of 7 days, ending on October 1, 2025. The ABO received 30 public comments. The comments can be generally grouped into four categories:

1. Support;
2. Complaints about the process and the outcome;
3. What to do with the non-deployment funding; and
4. A recommended change to the audit section of the proposed contract.

The ABO is addressing the comments as follows:

Category 1: The ABO posted a "Thank You" on its website to those who sent letters of support. Category 2: The complaint comments were all related to two entities that did not receive an award. Both entities have filed appeals and that process is ongoing.

Category 3: The ABO has reviewed these comments and if there are non-deployment funds, will consider them.

Category 4: The ABO will be making this change to the draft contract.

6.1 Certification of Challenge Process

Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

Yes

6.2 Public Post Website - Challenge Process

Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.

Results of Alaska's Mapping Challenge were posted to the ABO website as the BSL List Appendix on December 16, 2024, for the original release of the Grant Program NOFO. The original web link is now inactive, but it can be accessed via archived link at

<https://web.archive.org/web/20250202213524/https://www.commerce.alaska.gov/web/abo/AlaskaBroadbandGrantProgram.aspx>. A new BSL list was posted with the revised Grant Program NOFO on July 3, 2025, that complies with the BEAD Restructuring Policy Notice.

Cure Response 10-24-25

Additional Detail for Subsection 6.2.

The ABO believes it already has accommodated this by posting the final classifications for underserved, unserved, and CAIs to the ABO website during the initial application period but in an abundance of caution the ABO will reupload the original post-challenge classifications as well as the post-RPN classifications to the Program Overviews and Timelines page no later than Monday, October 27.

7.1 Coverage of Unserved Locations

Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C.

§ 1702(h)(2).

Yes

7.2 Unserved Locations - Financially Incapable Narrative

If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

There are currently no unserved locations not included in projects.

7.3 Unserved Locations - Financially Incapable Documentation

If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

7.4 Coverage of Underserved Locations

Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47

U.S.C. § 1702(h)(2).

Yes

7.5 Underserved Locations - Financially Incapable Narrative

If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

There are currently no underserved locations not included in projects.

7.6 Underserved Locations - Financially Incapable Documentation

If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

7.7 Certification of No BEAD Location Documentation

Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved final list of eligible locations through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the fp_no_BEAD_locations.csv file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

Yes

7.8 Certification of Enforceable Commitments

Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

Yes

11.1 Implementation Status of Plans - Cost and Barrier Reduction

Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.

Alaska's approved IPV2 (Section 02.10.01 Cost and Barrier Reduction Steps) included three steps to reduce costs and barriers to deployment.

a. The State has already enacted plans to reduce costs and barriers through involving existing providers and interconnecting to existing infrastructure through mapping and permitting tools utilized by the ABO and made available to providers. Applicants will need to show that they are interconnecting rather than overbuilding existing infrastructure. This will reduce costs, optimize the BEAD funds, and add resilience and redundancy to the existing infrastructure in Alaska.

Status: Complete. As part of the network review of each application, the Scoring Committee reviewed the use of interconnections to existing infrastructure identified by each applicant.

b. The ABO is working with the Department of Transportation and Public Facilities (DOT&PF) of the State of Alaska to coordinate projects that the DOT&PF has, as well as projects that the ABO is contemplating, to ensure, wherever possible, the projects can be aligned for a dig-once policy.

Status: In Progress. The ABO has allocated funds within the IPFR and FPFR to enter into a Reciprocal Services Agreement (RSA) with ADOT&PF for Right-of-Way (ROW) Permit staff to be dedicated to reviewing and approving ROW Permits for BEAD funded projects. This reduces the time barrier associated with ROW Permit issuance. It also provides ADOT&PF information about upcoming projects that may be scheduled concurrently with DOT work in the same area allowing for project coordination.

c. The ABO and the Department of Natural Resources Office of Project Management (OPMP) and Permitting have worked together with federal, and state permitting agencies to optimize and streamline the permitting process. This includes the creation of a land-ownership map of Alaska. The ABO will use this map in conjunction with the subgrantees to have them identify the paths for all proposed infrastructure builds so that as soon as the applications are submitted to the ABO, all the permitting parties will know the paths and what lands will be crossed. The OPMP has developed a survey of all permitting parties and all permitting types that the subgrantee can then use to check off which parties will be issuing permits and what those permits will be. The OPMP will then facilitate and manage their permitting process of the various parties and sub-grantees.

Status: Complete. Through an RSA with the Mapping and Analytics Team within the Division of Community and Regional Affairs (DCRA), a Permit and Land Map Tool was created using a GIS-based platform. The mapping tool was used by applicants to the Grant Program to map network routes identifying the land crossings and resource agency permits required for each BEAD funded

project. The OPMP has completed the development of a broadband project Pre-Permit Questionnaire that can be used by each subgrantee when identifying all necessary environmental, resources, and land permits required for a project. The ABO will be assuming responsibility for permit coordination from OPMP and will be dedicating staff to that effort.

11.2 Status of Compliance - Federal Labor and Employment Laws

Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

Yes

11.4 Status of Compliance - Low-Cost Service Option

Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

Yes

11.6 Status of Compliance - Network Reliability and Resiliency

Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

Yes

12.1 Priority Broadband Project

Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.

The ABO applied the definition of Priority Broadband Project within the “Supra-Scoring” section to adhere to the Infrastructure Act and the BEAD Restructuring Policy Notice (see Requirement 1, Subsection 1.1.).

Cure Request 10-24-25

Additional Detail for Subsection 12.1.

Per project Priority Broadband Project methodology: It is very important to note that the Priority Broadband Project evaluation was only applied to an application if the application passed the minimum qualification criteria, as required by the NTIA BEAD NOFO and the Alaska Broadband Grant Program NOFO. Once an applicant had successfully shown that they met all required criteria, then the application was evaluated under the Super-Scoring section of the Alaska Broadband Grant Program NOFO to determine if the project meets the definition of Priority Broadband Project: “...a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and, in order to ensure equal access to broadband by all Alaskans, can easily scale speeds as determined by FCC Broadband Benchmarks over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.”

There were no valid applications that failed to achieve Priority Broadband Project status. Further, A Priority Broadband Project curing process was not needed, as 100% of the valid applications were determined to be Priority Broadband Projects. All of the applications that successfully met all of the minimum qualification criteria passed the metric of and were considered Priority Broadband Projects. No technologies were excluded, nor were any denied Priority Broadband Project status in

one location but granted Priority Broadband Project status elsewhere.

13.1 Eligible Entity Scoring Criteria

Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

Please refer to Requirement 1, Subsection 1.1., Stage 2: Scoring. Cure Response 10-24-25 Additional Detail for Subsection 13.1.

The ABO considered pricing to fall under “other technical capabilities” because pricing was considered to be a proxy for technical efficiency. To be clear, the ABO was not looking for a specific price point from the applicants (which is not allowed per the June 6, 2025, Restructuring Policy Notice). The ABO is completely agnostic to the numbers that applicants provided in Criterion 13: Low-Cost Service Option. That being written, the ABO considered those numbers to be a proxy for companies’ technical efficiency because, all else being equal, the company with the lowest number is, by implication, the most technologically efficient. To clarify this, the ABO will replace the language in the Final Proposal Section 1.1. Subgrantee Selection Process, Other Technical Capability (20 Points), with the following: “The Applicant that provided the most technologically efficient service option of 100/20Mbps with less than 100ms latency received 100% of the points in this subcategory. All other Applicants received 0 points. The Scoring Committee used the responses to Criterion 13 of the Grant Program for each Project Area as a proxy indicator for technological efficiency by assessing that the lowest number in Criterion 13 indicated the most technologically efficient applicant

14.1 EHP Documentation Upload

Submit a document which includes the following:

Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.

Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.

Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.

Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

15.1 Resolution of Consent

Instructions: The following attachment is required if the Eligible Entity responded 'Yes' to the column identifying whether any of the projects intersect with Tribal Lands, per the Deployment Projects CSV. Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

SOA Final Proposal - Requirement 15 (R1 10-14-10-15-2025 08-57-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf

16.1 Prohibition on Excluding Provider Types

Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

Yes

17.1 Waivers

If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note 'Not applicable.'

The Alaska Broadband Office has submitted seven waiver requests, four programmatic waivers and three deadline extension waivers. Two of the four programmatic waivers and all deadline extension waivers were approved. They are:

Approved waiver requests:

1. Footnote 70 Waiver: On September 26, 2024, the ABO was granted a conditional waiver of the Alaska-specific portions of Footnote 70 of the Broadband Equity, Access, and Deployment (BEAD) Notice of Funding Opportunity (NOFO). Alaska was determined to have met its burden of showing good cause for the waiving of the Alaska-specific provisions of Footnote 70, conditioned on the ABO's compliance with specific requirements outlined in the full waiver, and that it is in the best interest of the Federal Government.
2. Newtok to Mertarvik BSL Moves Waiver: On October 10, 2025, NTIA approved Alaska's request to enable deployment to 78 BSLs that must be relocated from Newtok, Alaska to Mertarvik, Alaska due to unique circumstances surrounding forced relocation of an entire community. The waiver does not increase the number of BSLs.
3. Final Proposal Deadline Extension Waiver 1: The ABO requested an extension on July 25, 2025. This request was superseded by the second request for extension below.
4. Final Proposal Deadline Extension Waiver 2: On September 23, 2025, Alaska's request for a second extension to the Final Proposal due date was approved due to SAC meeting follow-up requirements, extending the due date to October 2, 2025.
5. Final Proposal Deadline Extension Waiver 3: On October 7, 2025, Alaska's third request for an extension to the Final Proposal due date was approved due to State leadership review of amendments to Alaska's program following the SAC review, extending the due date to October 17, 2025.

Denied waiver requests:

1. Disposition of Alaska's Tribal Consent Waiver Request: On July 11, 2025, the NTIA denied the ABO's request for a waiver to the Tribal consent process. The waiver was denied on the basis the previous conditional waiver granted on September 26, 2024, addressed the unique circumstances of Tribal entities in Alaska, and it was not in the best interest of the Federal Government to modify the previous waiver.

2. Initial Proposal Negotiations Correction Waiver Request: On September 23, 2025, NTIA denied the ABO's request for a waiver to amend the terms of negotiation outlined in the Initial Proposal. The waiver was denied on the grounds the waiver was unnecessary as Alaska's proposed changes to the Initial Proposal were processes that the ABO could engage in under its general authority to negotiate situations in which there were no winning bids.

Final Proposal Funding Request Amount

Enter the amount of the Final Proposal Funding Request.

1012139672.42

Project Narrative

Submit the Eligible Entity's project narrative.

SOA Final Proposal Funding Narrative (R8b 02--02-13-2026 06-45-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.docx

Consolidated Budget Form

Submit the Eligible Entity's consolidated budget form.

SOA Final Proposal -- BEAD Funding Request ---02-13-2026 06-57-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.xlsx

Final Proposal Funding Request Waivers

Upload an attachment(s) detailing the waiver request(s) for the requirements related to the Final Proposal Funding Request. Please draft the waiver request(s) using the Waiver Request Form template.

SOA Final Proposal - Match Waiver Request - 1-10-16-2025 03-27-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf

SOA Final Proposal - Match Waiver Request - 1-10-16-2025 03-27-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf

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SOA Final Proposal - Match Waiver Request - 0-10-16-2025 03-26-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf
