

# DRAFT – Broadband Equity, Access and Deployment Program: Final Proposal



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## Introduction

The Notice of Funding Opportunity (NOFO) for the Broadband Equity, Access, and Deployment (BEAD) Program was released by the National Telecommunications and Information Administration (NTIA) in May of 2022. Three months later the Alaska Broadband Office (ABO) was officially established when Governor Dunleavy signed House Bill 363 in August 2022.

Over the last three years the ABO has met the milestones required by the BEAD Program:

1. The Alaska Broadband Five-Year Action Plan (completed August 2023),
2. The Mapping Challenge – BEAD Initial Proposal Volume I (completed August 2024),
3. The development of the Alaska Broadband Grant Program – BEAD Initial Proposal Volume II (approved by the NTIA in November 2024), and
4. The Alaska Broadband Grant Program (ongoing).

The BEAD Final Proposal is the ABO's last milestone to be completed prior to subgrants being awarded. Once approved by the NTIA, the ABO will award subgrantees, enter into grant agreements, and monitor the construction and deployment of broadband infrastructure projects throughout the state.

The guidelines for the Final Proposal were established in the BEAD NOFO and originally included 15 minimum requirements. The NTIA's June 6, 2025, *BEAD Restructuring Policy Notice* (Notice) eliminated several elements, amended others, and added two. Those revisions are incorporated in this document.

The Final Proposal will be submitted online in the NTIA Grants Portal by answering a series of questions related to each of the requirements. The Final Proposal includes two components – a Programmatic section (the questions and answers) and a Data section (five data files containing the pertinent BSL, project, and subgrantee information). This Final Proposal narrative is arranged with the Programmatic Requirements 1-17 first, followed by the Data Requirements. Under each Requirement summary can be found the related Final Proposal questions, followed by the ABO's response to each question. Where a Final Proposal Requirement was eliminated or amended by NTIA, this has been noted. There are several instances where a document must be uploaded in the Portal as part of an answer. Where this is the case, the item is identified and attached to this document as an appendix. A list of all appendices can be found in the Table of Contents.

## Final Proposal – Programmatic

### Requirement 1: Subgrantee Selection Outcomes

*A detailed plan that specifies the outcome of the ABO's subgrantee selection process and how the ABO will:*

- a. *allocate grant funds to subgrantees for the deployment of broadband networks to unserved locations, underserved locations, and (if applicable) CAIs in accordance with the prioritization framework described in Section IV.B.7.b of the BEAD NOFO; and*
- b. *align the grant funds allocated to the ABO under the BEAD Program, where practicable, with the use of other funds for broadband that the ABO receives from the federal government, the State of Alaska, or any other source.*

#### 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.

**ABO RESPONSE:** 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”.<sup>1</sup> 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

### **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.

**ABO RESPONSE:** 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

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<sup>1</sup> 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.



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.

### **1.3 No Applications**

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

**ABO RESPONSE:** 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 ABO's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

**ABO RESPONSE:** 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 ABO 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.

**ABO RESPONSE:** Yes

### **Requirement 2: *Intentionally Removed By the NTIA***

### **Requirement 3: Implementation Plan**

***A timeline for implementation of the detailed plan and completion of each project and other eligible activity to be funded.***

### 3.1 Timeline of All BEAD Grant Activities

Has the ABO 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 ABO'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 ABO are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

**ABO RESPONSE:** The ABO has taken measures to ensure all grant timelines are met by subgrantees for each of the 3 categories:

- 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.

## Requirement 4: Oversight and Accountability

***Processes for oversight and accountability to ensure the proper use of the grant funds allocated to the ABO under the BEAD Program consistent with Section IX.G of the BEAD NOFO.***

### 4.1 Public Waste, Fraud, and Abuse Hotline

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

**ABO RESPONSE:** No

#### **4.2 Oversight and Accountability**

Upload the following two required documents:

##### **4.2.1 Oversight and Accountability - BEAD Program Monitoring Plan**

(1) BEAD program monitoring plan;

**ABO RESPONSE:** \*Upload Or drop files.

The ABO will upload the ABO Procedure for Grant Program Monitoring, Oversight, and Accountability. Attached here as Appendix A.

##### **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 ABO 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 ABO) reporting mandates.

**ABO RESPONSE:** \*Upload Or drop files.

The ABO will upload the ABO Procedure for Grant Program Monitoring, Oversight, and Accountability. Attached here as Appendix A.

#### **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 ABO's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the ABO'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 ABO 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 acknowledgement 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.

**ABO RESPONSE:** Yes

## Requirement 5: Local Coordination

The NTIA Notice eliminated BEAD NOFO Sections IV.C.1.c. and IV.C.2.c.iv., including, *“The NTIA Certification that the Eligible Entity has conducted coordination, including with Tribal Governments, local community organizations, and unions and worker organizations, consistent with the requirements set forth in Section IV.C.1.c of this NOFO, a description of the coordination conducted, and a summary of the impact such coordination had on the content of the Final Proposal”*, and replaced it with, *“...An Eligible Entity [ABO] shall satisfy this requirement by certifying that it observed the Final Proposal public comment requirements and received plans submitted by political subdivisions up until submission of the Final Proposal to NTIA.”*

### 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.

**ABO RESPONSE:** The draft Final Proposal, including the results of 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.

[XX] comments were received. The comments can be generally grouped into the following categories:

[XX]

The ABO addressed comments as follows:

[XX]

## Requirement 6: Challenge Process Results

*Description of the results of the challenge process conducted by the ABO under Section IV.B.6. of the BEAD NOFO.*

### 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.

**ABO RESPONSE:** 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.

**ABO RESPONSE:** 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.

## Requirement 7: *Unserved and Underserved Locations*

*Certification that the ABO will provide service to all unserved and underserved locations, if the ABO is seeking to use BEAD funding for deployment to CAIs or for other eligible activities.*

### 7.1 Coverage of Unserved Locations

Certify whether the ABO 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).

**ABO RESPONSE:** Yes

### 7.2 Unserved Locations – Financially Incapable Narrative

If the ABO 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 ABO made that determination.

**ABO RESPONSE:** There are currently no unserved locations not included in projects.

### 7.3 Unserved Locations – Financially Incapable Documentation

If applicable to support the ABO’s response to Question 7.2, provide relevant files supporting the ABO’s determination.

**ABO RESPONSE:** \*Upload Or drop files

### 7.4 Coverage of Underserved Locations

Certify whether the ABO 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).

**ABO RESPONSE:** Yes

## **7.5 Underserved Locations – Financially Incapable Narrative**

If the ABO 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 ABO made that determination.

**ABO RESPONSE:** There are currently no underserved locations not included in projects.

## **7.6 Underserved Locations – Financially Incapable Documentation**

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

**ABO RESPONSE:** \*Upload Or drop files

## **7.7 Certification of No BEAD Location Documentation**

Certify that the ABO has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the ABO will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the ABO 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 ABO in the fp\_no\_BEAD\_locations.csv file. The ABO 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.

**ABO RESPONSE:** Yes

## **7.8 Certification of Enforceable Commitments**

Certify that the ABO has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the ABO was notified of and did not object to, and/or federally-funded awards for which the ABO 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.

**ABO RESPONSE:** Yes

## **Requirement 8: Intentionally Removed By the NTIA**

## **Requirement 9: Intentionally Removed By the NTIA**

## **Requirement 10: Intentionally Removed By the NTIA**

## **Requirement 11: Implementation Status of Plans**

*Implementation status of plans described in the Initial Proposal related to:*

- a. Steps that the ABO has taken or intends to take to promote streamlined permitting processes and cost-effective access to poles, conduits, easements, and rights of way, including the imposition of reasonable access requirements;*



- b. Intentionally Removed by the NTIA;*
- c. Intentionally Removed by the NTIA;*
- d. Low-cost plan requirements; and*
- e. Intentionally Removed by the NTIA.*

### 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.

**ABO RESPONSE:** 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 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 ABO required subgrantees to certify compliance with existing federal labor and employment laws.

***ABO RESPONSE:*** Yes

## **11.4 Status of Compliance – Low-Cost Service Option**

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

***ABO RESPONSE:*** 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.

***ABO RESPONSE:*** Yes

# **Requirement 12: Priority Broadband Projects**

***Information regarding specific commitments made by provisionally selected subgrantees to warrant a project's treatment as a Priority Broadband Project.***

## **12.1 Priority Broadband Project**

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

***ABO RESPONSE:*** 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.).

# **Requirement 13: Primary and Secondary Scoring**

***Information regarding specific commitments made by provisionally selected subgrantees to warrant benefits in the ABO's subgrantee selection process (e.g., the primary and secondary criteria).***

## **13.1 Eligible Entity Scoring Criteria**

Provide a narrative summary of how the ABO 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 ABO. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

**ABO RESPONSE:** Please refer to Requirement 1, subsection 1.1., Stage 2: Scoring.

## **Requirement 14: Environmental and Historical Preservation**

***Environmental documentation associated with any construction and/or ground-disturbing activities and a description of how the ABO will comply with applicable environmental and national historical preservation requirements.***

### **14.1 EHP Documentation Upload**

Submit a document which includes the following:

- a. 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.
- b. 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.
- c. 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>.
- d. 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.
- e. 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.

**ABO RESPONSE:** \*Upload Or drop files.

The ABO will upload the following files:

- a. Alaska Broadband Office Environmental and Historical Preservation Compliance Summary. Attached here as Appendix D.
- b. See Appendix D.
- c. FirstNet PEIS Alaska Region Sufficiency Review Memo. Attached here as Appendix E.
- d. FirstNet Regional PEIS Alaska Deployment Activities Coverage Evaluation. Attached here as Appendix F.
- e. See Appendix D.

## Requirement 15: Consent from Tribal Entities

### 15.1 Resolution of Consent

Instructions: The following attachment is required if the ABO 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 ABO should include appropriate signatories and relevant context on the planned broadband deployment including the timeframe of the agreement. The ABO must include the name of the Resolution of Consent PDF in the [Deployment Projects CSV](#) file.

**ABO RESPONSE:** \*Upload Or drop files.

The ABO will upload a Tribal Consent Summary, consistent with Alaska's Footnote 70 Waiver, and substantial evidence of time-relevant consent provided by Provisional Subgrantees at the time of application. Appendix G TBD.

## Requirement 16: Prohibition on Excluding Provider Types

### 16.1 Prohibition on Excluding Provider Types

Does the ABO 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)?

**ABO RESPONSE:** Yes

## Requirement 17: Waivers

### 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 ABO, note 'Not applicable.'

**ABO RESPONSE:** The ABO has one previously approved waiver. The ABO was granted a waiver to Footnote 70 of the BEAD NOFO on September 27, 2024. The waiver amends Footnote 70 to be consistent with the Alaska Native Claims Settlement Act.

### 17.2 Waivers Upload

If not already submitted to NTIA, and the ABO needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the ABO does NOT have to upload waiver documentation again.

**ABO RESPONSE:** \*Upload Or drop files.

The ABO is not requesting any additional waivers. No additional documentation will be uploaded.

## Final Proposal – Data

### Requirement 1: Subgrantee Selection

#### 0.1 Last-Mile Deployment Subgrantees

Complete and submit the [Subgrantees CSV](#) file (named “fp\_subgrantees.csv”) using the NTIA template provided.

Instructions:

**NTIA Data Requirement - Last-Mile Deployment Subgrantees:** The ABO must submit a detailed plan in the form of a Comma Separated Values (CSV) file with the outcomes of the Subgrantee Selection Process, using the data format provided by NTIA. The ABO must complete all mandatory fields in the file named “fp\_subgrantees.csv.”

**ABO RESPONSE:** \*Upload Or drop files.

The ABO will upload in CSV format the file titled “DRAFT – SOA Final Proposal – Subgrantees (R1 09-24-25).xlsx” which is posted on the ABO website as an Excel file for ease of public consumption.

#### 0.2 Last-Mile Deployment Projects

Complete and submit the [Deployment Projects CSV](#) file (named “fp\_deployment\_projects.csv”) using the NTIA template provided.

Instructions:

**NTIA Data Requirement - Last-Mile Deployment Projects:** The ABO must submit a detailed plan in the form of a CSV file with details on the (f)(1) last-mile deployment projects to be implemented by the provisionally selected subgrantees, using the data format provided by NTIA. The ABO must complete all mandatory fields in the file named “fp\_deployment\_projects.csv.”

For subgrantees that will implement multiple projects, list each project on a separate row, and include a unique project identifier.

**ABO RESPONSE:** \*Upload Or drop files.

The ABO will upload in CSV format the file titled “DRAFT – SOA Final Proposal – Deployment Projects” (R1 09-24-25).xlsx” which is posted on the ABO website as an Excel file for ease of public consumption.

#### 0.3 BEAD-funded Locations

Complete and submit the [Locations CSV](#) file (named “fp\_locations.csv”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

Instructions:

**BEAD-funded Locations:** The ABO must submit a detailed plan in the form of a CSV file with data on all (f)(1) last-mile deployment locations and CAIs to be funded by BEAD, using the data format provided by NTIA. The ABO must complete all mandatory fields in the file named “fp\_locations.csv.”

**ABO RESPONSE:** \*Upload Or drop files.

The ABO will upload in CSV format the file titled “DRAFT – SOA Final Proposal – Locations” (R1 09-24-25).xlsx” which is posted on the ABO website as an Excel file for ease of public consumption.

#### **0.4 No BEAD Locations**

Complete and submit the [No BEAD Locations CSV](#) file (named “fp\_no\_BEAD\_locations.csv”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

Instructions:

**No BEAD Locations:** The ABO must submit a detailed description in the form of a CSV file with data on all BEAD-eligible locations identified upon the conclusion of the Challenge Process that will not be served through a BEAD project, using the data format provided by NTIA. The Eligible Entity must complete all mandatory fields in the file named “fp\_no\_BEAD\_locations.csv.”

**ABO RESPONSE:** \*Upload Or drop files.

The ABO will upload in CSV format the file titled “DRAFT – SOA Final Proposal – No BEAD Locations (R1 09-24-25).xlsx” which is posted on the ABO website as an Excel file for ease of public consumption.

#### **0.5 Use of Funds to Serve CAIs**

If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)?

**ABO RESPONSE:** Yes

The ABO will upload in CSV format the file titled “DRAFT – SOA Final Proposal – Community Anchor Institutions (R1 09-24-25).xlsx” which is posted on the ABO website as an Excel file for ease of public consumption.

## ***Programmatic Appendices***

**Appendix A: ABO Procedure for Grant Program Monitoring, Oversight, and Accountability (4.2.1-4.2.2)**

**Appendix B: Unserved Locations – Financially Incapable Documentation (7.3) – N/A**

**Appendix C: Underserved Locations – Financially Incapable Documentation (7.6) – N/A**

**Appendix D: ABO Environmental and Historical Preservation Compliance Summary (14.1)**

**Appendix E: FirstNet PEIS Alaska Region Sufficiency Review Memo (14.1)**

**Appendix F: FirstNet PEIS Alaska Deployment Activities Coverage Evaluation (14.1)**

**Appendix G: Tribal Consent Summary and Consent Evidence (15.1) – TBD**