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Funding Program Name	Broadband Equity Access and Deployment (BEAD) Program
Funding Request Name	Alabama-BEAD-Final Proposal-Programmatic
Applying Organization	ECONOMIC AND COMMUNITY AFFAIRS, ALABAMA DEPARTMENT OF
Applicant Name	Maureen Neighbors

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.

ADECA conducted a competitive, technology-neutral subgrantee selection process consistent with the state's NTIA-approved Initial Proposal Volume II (IPv2) as modified by the BEAD Restructuring Policy Notice. ADECA took key steps in the process to reduce costs and increase competition:

ADECA reviewed all applications to verify 100% completion of location templates and Reason Code data. This rigorous analysis ensured that all evidence submitted was NTIA-compliant so that Reason Code 1, 2, 4, and 5 locations could be removed—thereby reducing the BEAD outlay.

ADECA contacted each applicant with non-compliant responses and held a technical assistance session to maximize the opportunities for applicants to submit compliant data. ADECA then accepted updates for 24 hours after the technical assistance session—during which time all applicants responded with updated Location Templates. ADECA then removed locations as necessary to ensure low BEAD outlay in compliance with NTIA rules.

As a next step, ADECA conducted a 24-hour cost reduction round in which applicants were asked to reduce their prices. Three applicants submitted price reductions. ADECA also conducted targeted negotiations to further reduce pricing.

ADECA then conducted a further price reduction round with the state's two low-Earth orbit (LEO) satellite applicants to get final pricing and commitments on all remaining broadband serviceable locations (BSL) that were excluded from the state's provisionally selected subgrantees' project areas.

In sum, ADECA's approach resulted in the minimum BEAD outlay for 100% coverage. The following sections describe the subgrantee selection process in detail.

Modifications in alignment with the Policy Notice

These modifications included:

- Eliminating “non-statutory requirements from BEAD application scoring, subgrantee agreements, and subgrantee reporting requirements”: Non-statutory labor, employment, and workforce development requirements; climate change requirements; open access/net neutrality requirements; local coordination and stakeholder engagement requirements; non-traditional broadband providers requirements; middle-class affordability plan requirements; low-cost service option requirements
- Adopting a technology-neutral approach to the BEAD subgrantee selection process, in alignment with the Policy Notice: “Fiber-optic technology, cable modem/hybrid fiber-coaxial technology, LEO satellite services, and terrestrial fixed wireless technology utilizing entirely licensed spectrum, entirely unlicensed spectrum, or a hybrid of licensed and unlicensed spectrum, may be used in applications for Priority Broadband Projects so long as the technologies employed in the project proposal meet the technical performance requirements in the NOFO, as redefined by this Policy Notice, and the statute”
- Enabling unlicensed fixed wireless providers to submit evidence of existing coverage which, if verified by the state, resulted in the removal of those locations from BEAD funding eligibility
- Optimizing BEAD locations and updating the state’s eligible locations list based on the reason code process defined in NTIA’s Final Proposal Guidance, including to reflect new enforceable commitments, locations that were removed from v6 of the FCC address Fabric, and entities in the previous CAI list that no longer qualify as CAIs for BEAD funding purposes (including “community support organizations” as defined by NTIA in its Final Proposal Guidance)
- Reopening the prequalification process to enable new entities and previous applicants that were not prequalified to apply, and to revise the prequalification application to remove questions about non-statutory requirements that were eliminated by the Policy Notice
- Conducting a Benefit of the Bargain Round of subgrantee selection with updated project applications, templates, guides, FAQs, and related documentation consistent with the Policy Notice, including technology-neutral determination of Priority Broadband Projects and revised scoring rubrics
- Evaluating all applications on a technology-neutral basis, which included the development of new technical templates to allow reviewers to determine whether a project qualified as a Priority Broadband Project based on objective and rigorously applied criteria for speed, latency, and scalability in alignment with the Policy Notice
- Prioritizing Priority Broadband Projects over non-Priority Broadband Projects, but selecting a lower-cost non-Priority Broadband Project if selecting a Priority Broadband Project would incur excessive costs
- Scoring applications with a primary focus on minimal BEAD program outlay for proposals to serve the same general project areas
- Applying secondary scoring criteria when an application proposed a total project cost within 15 percent of the lowest-cost proposal on a per-BSL basis for the same general project area

Summary of the state’s subgrantee selection process prior to the Policy Notice

ADECA completed a prequalification phase and opened a BEAD application period consistent with the approved IPv2 prior to the issuance of the Policy Notice. In compliance with the Policy Notice, ADECA conducted a Benefit of the Bargain Round (as described below) that included prequalification, resubmission of project applications, and submission of new project applications.

ADECA made no awards prior to the issuance of the Policy Notice, and so was not required to rescind any preliminary awards before conducting the Benefit of the Bargain Round.

ADECA notified prospective applicants of the new subgrantee selection process on June 18, 2025, via a blast email informing potential applicants of an upcoming webinar to discuss the new process.

Reconciling the list of eligible locations

ADECA investigated and accounted for locations that do not require BEAD funding using the reason code process detailed in NTIA's Final Proposal Guidance, as confirmed in the Policy Notice.

ADECA notified unlicensed fixed wireless providers on June 12, 2025, to respond by June 19, 2025, with their intent to submit evidence that BEAD-eligible locations they serve have access to BEAD-qualified service, giving providers a seven-day window in alignment with the Policy Notice's requirements. ADECA developed a technical template in alignment with the Policy Notice for providers to submit their evidence. Providers who responded within the window were given the template, instructions, and a deadline of seven calendar days to submit their evidence. No providers submitted evidence within the required timeframe.

On June 13, 2025, ADECA was notified by its NTIA Federal Program Officer that NTIA did not receive notice of any defaults or changes in service area for federal enforceable commitments in the state.

ADECA removed locations from its approved CAI list that no longer qualify as CAIs under the definition adopted by the Policy Notice.

On June 30, 2025, the state published a list of the approved post-Challenge Process location classifications reconciled per the Policy Notice for the Benefit of the Bargain Round.

Reopening the Prequalification phase

Following the issuance of the Policy Notice, the state updated its prequalification application and related guidance to be consistent with the Policy Notice, including by removing questions related to Fair Labor Practices and other program requirements that were eliminated by the Policy Notice.

Prior to opening the Benefit of the Bargain Round, ADECA reopened the prequalification process to new entities and entities that did not previously prequalify. Applicants that prequalified during the first prequalification phase were not required to reapply, and ADECA disregarded any replies the applicant had previously submitted in response to questions that were eliminated from the prequalification application in alignment with the Policy Notice.

ADECA published the updated prequalification application materials on its website on June 20, 2025. ADECA also hosted a webinar on June 20, 2025, to discuss Alabama's BEAD program changes in compliance with the Policy Notice and instruct providers that were not currently prequalified on how to prequalify. A recording of this webinar was posted on ADECA's website.

ADECA accepted new prequalification applications from June 20, 2025, to June 30, 2025.

Prequalification applications were reviewed on a pass/fail basis in alignment with the state's Initial Proposal Volume II (IPv2) and the Policy Notice to determine whether the prospective applicant was qualified to participate in the subgrantee selection process. The state's prequalification process ensured that all applicants met the BEAD Program's financial and managerial capacity, technical and operational capability, and other requirements.

Conducting the "Benefit of the Bargain Round"

The state updated its previously developed BEAD project application, templates, guidelines, FAQs, and related documents to be consistent with the Policy Notice, including by removing questions related to requirements eliminated by the Policy Notice and replacing questions related to scoring to align with the scoring criteria specified in the Policy Notice. (The response to Question 13.1 in this Final Proposal explains how the state applied the Policy Notice's scoring criteria.)

The state also developed new technical templates to allow engineer reviewers to determine, in a technology-neutral way, whether a project qualified as a Priority Broadband Project per the federal requirements. These templates and the technical review process were based on objective and rigorously applied criteria that allowed any technology to be evaluated for speed, latency, and scalability and allowed the same responses to be used for scoring under secondary criteria. (For a detailed description of the state's methodology to substantiate Priority projects, see the response to Question 12.1 in this Final Proposal.) The technical templates were designed to be low burden for applicants while still eliciting the data ADECA needs to effectuate the requirements of the Policy Notice with respect to analyzing each project for Priority status.

To communicate these changes and requirements fairly to all eligible applicants, the state published updated scoring matrices on its website on June 27, 2025, and published an updated project application guide, application form, technical templates, FAQs, and related materials on June 30, 2025. ADECA sent a blast email on June 30, 2025, informing prequalified applicants about the timing of Alabama's Benefit of the Bargain Round. In addition, ADECA hosted a webinar on June 30, 2025, to discuss specifics of the Benefit of the Bargain Round application and the online application submission process. A recording of the webinar was posted on ADECA's website.

ADECA opened the application window for the Benefit of the Bargain Round on July 1, 2025, and accepted applications until July 15, 2025.

ADECA held virtual drop-in office hours on July 9, 2025, and July 14, 2025, for potential applicants to ask questions about the process, application, and portal. ADECA published and provided weekly updates to FAQs that included questions from the webinars, office hours, and questions sent via email.

Requiring resubmission of previously submitted project applications

Applicants that previously had submitted project applications were required to resubmit their applications if they wanted the applications to be considered in the Benefit of the Bargain Round. ADECA took efforts to ensure that previously submitted applications could be revised by applicants to meet all new requirements.

ADECA reopened all previously submitted applications in its grant submission portal and deleted responses to questions that were eliminated from the Benefit of the Bargain Round application in alignment with the Policy Notice. Applicants were advised to review all previous responses; update any previous responses as needed; answer any new questions added to the application in alignment with the Policy Notice; and resubmit their applications by the deadline.

Evaluating and scoring the Benefit of the Bargain Round project applications

ADECA engaged an independent team of trained reviewers to conduct application review and scoring based on the scoring rubric in alignment with the Policy Notice.
- Sufficiency review: Reviewers began the evaluation of project applications by reviewing the

application for completeness and sufficiency. Individual components of the application were then reviewed by subject matter experts.
- Financial review: Financial experts reviewed responses to questions related to the applicant's financial capability and project-specific financial documentation.
- Technical review: Telecommunications technology experts reviewed responses to questions related to technical design for technical feasibility and for Priority/Non-Priority determinations. As described in Question 12 of this Final Proposal, the state's technical review followed a uniform, technology-neutral approach. The process took into account that each technology has different attributes (e.g., fiber count, spectrum, satellite functionality) that necessarily require different technical evidence submission templates and a slightly different approach in performing the technical review.

After sufficiency reviewers confirmed the application was complete and that the data were sufficient for scoring, the technical reviewers made Priority/Non-Priority determinations for each application. An analytics team then scored each application.

The analytics team evaluated responses to scored questions according to ADECA's updated BEAD scoring criteria and generated a cost per location and a numerical score for the secondary scoring criteria for each application that had a competing proposal in the same general project area with a cost per location within 15 percent of the lowest-cost proposal.

Reviewers conducted a quality control check of the score outputs by comparing the outputs to applicants' responses in the application. A technical expert also validated score outputs against the technical review results.
Findings from the review and scoring process were presented to ADECA for confirmation, final determinations on the eligibility of applications, and decision-making on how to proceed in subgrantee selection.

Selecting subgrantee and making awards

ADECA made preliminary subgrant awards to the projects that scored highest for each project area, in line with the scoring rubric and other requirements in the statute and the NOFO, as modified by the Policy Notice.

As is described in the Final Proposal, ADECA undertook a considerable set of steps, including multiple cost reduction rounds and multiple negotiations, to achieve reasonable costs for each proposed award. These included:

1. Potential applicants were advised that excessive cost proposals would be rejected and were advised that they should assemble their proposed projects in a way that maximized efficiency and demonstrated prudent planning.
2. Once applications were received, ADECA gave all applicants the opportunity to submit improved pricing and encouraged them to reduce every application in light of the goal of achieving the benefit of the bargain. Multiple applicants significantly reduced their pricing at that stage.
3. Following receipt of the revised offers, ADECA discarded applications that it considered excessively costly and targeted others that it believed could reasonably be reduced to even lower costs.
4. As a result of the Special Award Condition meeting, ADECA was instructed to ensure that all projects were at or below $12,000 - $13,000 per location. ADECA went back to the six excessively high-cost preliminary awardees and negotiated down to $10,500 or lower per location. Some of the awardees accomplished this by removing higher-cost locations and/or increasing their match

contribution.
5. ADECA also conducted a further cost reduction round with the state's two LEO satellite applicants to get final pricing and commitments on all remaining locations that were excluded from the provisionally selected subgrantees' project areas.

Over the course of these combined efforts, ADECA brought 100 percent of proposed awards down to below $10,500 per location and all but six of the proposed awards to below $10,000 per location. NTIA instructed ADECA to revisit the six proposals that were in excess of $10,000. ADECA contacted each applicant and asked them to revisit their proposal and determine what actions were required to reduce their average location cost to less than $10,000.

Five of the six applicants were able to reduce below the requested target by either increasing their match amount or removing locations. One proposal remains above $10,000 at $10,500 (Ardmore Telephone Company in Lowndes County.) ADECA requested that the applicant write a justification for this project for consideration by NTIA. The cost justification submitted by the company's CTO is shown below under Lowndes County.

ADECA seeks guidance on any further actions required. We believe the remaining projects now meet NTIA requirements for approval.

Purpose
The purpose of the Excessive Cost Project Justification is to outline the reasonable justifications for the higher-cost projects proposed as part of Alabama's BEAD Program Final Proposal to serve all eligible broadband serviceable locations (BSL) in the state.

Background

Following the conclusion of its Benefit of the Bargain Round, the Alabama Department of Economic and Community Affairs (ADECA), via the Alabama Digital Expansion Division, selected a combination of fiber optic, hybrid fiber-coaxial (HFC) cable, fixed wireless, mixed technology, and satellite awardees for a total of 63 awards with 15 distinct providers.

In accordance with NTIA's June 6th BEAD Restructuring Policy Notice (RPN), Eligible Entities were "no longer required to establish an Extremely High Cost Per Location Threshold, but an Eligible Entity shall reject a Priority Broadband Project if the cost of the project is excessive."

Alabama selected a reasonable cost threshold of $10,500 per location. Alabama also evaluated proposals project-by-project and area-by-area based on the Minimal BEAD Program Outlay criterion, emphasizing the lowest overall cost to the program.
The outcomes of the Benefit of the Bargain Round enabled Alabama to:
1. Achieve 100 percent coverage of all unserved and underserved locations across the state with an average cost per location of $4,980.28
2. Avoid excessive deployment costs across areas with low population density and geographic barriers

The National Telecommunications and Information Administration (NTIA) subsequently identified the following provisional awards that exceeded its excessive cost threshold and required ADECA to submit additional justification.
Table 1: Projects requiring excessive cost justification

County	Provisional awardee	BEAD cost per BSL	Technology	Total BSLs	Total CAIs		
Autauga	Bellsouth Telecommunications, LLC	$7,183.79	Fiber	366	0		
Barbour	Windstream Alabama, LLC	$7,171.79	Fiber	864	0		
Bibb	Bellsouth Telecommunications, LLC	$10,000.00	Fiber	154	0		
Calhoun	Comcast Cable Communications Management LLC	$8,342.28	Fiber	1,193	42		
Chilton	Premier Holdings, LLC	$9,999.00	Fiber	1,991	16		
Clarke	Bellsouth Telecommunications, LLC	$10,000.00	Fiber	779	0		
Cleburne	Premier Holdings, LLC	$9,999.00	Fiber	2,055	13		
Coffee	Connect Holding II LLC	$5,936.55	Fiber	347	2		
Colbert	Comcast Cable Communications Management LLC	$7,379.96	HFC	1,010	35		
Conecuh	SP Broadband Inc	$7,242.19	Fiber	3,136	14		
Coosa	Windstream Alabama, LLC	$5,627.58	Fiber	514	0		
Crenshaw	Connect Holding II LLC	$7,951.02	Fiber	466	0		
Cullman	Bellsouth Telecommunications, LLC	$9,999	Fiber	368	0		
Dale	Spectrum Southeast, LLC	$8,700.38	Fiber	1,093	0		
Dallas	Bellsouth Telecommunications, LLC	$9,720.00	Fiber	1,487	0		
DeKalb	Farmers Telecommunications Corporation	$9,890.15	Fiber	266	0		
Elmore	Windstream Alabama, LLC	$5,864.58	Fiber	865	0		
Escambia	SP Broadband Inc	$7,838.76	Fiber	1,369	15		
Etowah	Comcast Cable Communications Management LLC	$9,950.00	HFC	1,167	28		
Geneva	Connect Holding II LLC	$6,372.38	Fiber	386	12		
Greene	MStreet Fiber Alabama, LLC	$8,369.90	Fiber	310	11		
Hale	MStreet Fiber Alabama, LLC	$8,680.82	Fiber	718	16		
Houston	Comcast Cable Communications Management LLC	$5,522.31	HFC	2,556	31		
Jefferson	Bellsouth Telecommunications, LLC	$6,016.73	Fiber	1,542	0		
Lauderdale	Comcast Cable Communications Management LLC	$7,403.45	HFC	1,169	24		
Lawrence	Premier Holdings, LLC	$8,924.12	Fiber	647	13		
Lee	Bellsouth Telecommunications, LLC	$8,778.19	Fiber	1,132	0		
Lowndes	Ardmore Telephone Co. Inc.	$10,500	Fiber	251	0		
Macon	Windstream Alabama, LLC	$6,990.44	Fiber	531	0		
Marengo	MStreet Fiber Alabama, LLC	$8,734.64	Fiber	408	22		
Marshall	Farmers Telecommunications Corporation	$6,529.62	Fiber	870	1		
Mobile	Comcast Cable Communications Management LLC	$5,773.01	HFC	5,182	119		
Monroe	SP Broadband Inc	$7,051.18	Fiber	3,379	18		
Shelby	Bellsouth Telecommunications, LLC	$10,000.00	Fiber	817	0		
St. Clair	Comcast Cable Communications Management LLC	$7,643.39	HFC	2,157	16		
Sumter	MStreet Fiber Alabama, LLC	$8,941.03	Fiber	729	10		
Talladega	Bellsouth Telecommunications, LLC	$9,999.00	Fiber	468	0		
Tuscaloosa	Comcast Cable Communications Management LLC	$9,543.86	HFC	3,314	82		
Walker	Bellsouth Telecommunications, LLC	$10,000.00	Fiber	505	0		
Washington	Millry Telephone Co Inc	$8,460.16	Fiber	1,117	0		

Justifications for projects exceeding NTIA's excessive cost threshold

Autauga County:

Bellsouth Telecommunications, LLC – CM61-BEAD-AL-1

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000335	Fiber	366	$7,183.79	0

Summary of extenuating circumstances

- This project will connect 248 unserved and 117 underserved BSLs in Autauga County, near the

city of Prattville, the town of Autaugaville, and the unincorporated communities of Marbury, Stoney Point, and Wadsworth.

- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. More than 80% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations are generally clustered linearly in unserved and underserved neighborhoods and communities (such as Marbury, Pate, Wadsworth, Washington Ferry, and Washington Hill). However, these clusters are separated by up to several miles, lowering the overall location density of the project.
- There are numerous water crossings in the area, and uplands drain into the Coosa River south of the project area.
- Autauga County lies within Alabama's Fall Line region, where soft sediments of the Coastal Plain meet the harder rocks of the Piedmont. The region features gently rolling hills underlain by sands, silts, and clays. These soils are generally easy to excavate but can vary sharply in cohesion and moisture retention, requiring attention to trench stability, proper bedding, and compaction to prevent settlement or conduit deformation.
- In parts of Autauga County, hard sandstone and gravelly layers can be found near the surface, making excavation more difficult and increasing equipment wear. Additionally, shallow groundwater and perched water tables in low-lying areas can cause trench flooding or soft ground during wet periods. Fiber installation in these areas may require watertight conduit systems, trench plugs, and dewatering to maintain stable excavation conditions.
- The region receives more than 55 inches of annual precipitation, with heavy seasonal rains that saturate clay-rich soils (notably the Oktibbeha and Savannah series). These soils expand when wet and contract when dry, leading to shifting backfill and potential conduit movement. Construction must be scheduled during moderate weather, with erosion- and sediment-control measures—such as silt fencing and stabilized trench backfill—implemented to protect both the conduit system and nearby waterways from sediment runoff.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.
- ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Barbour County:
Windstream Alabama, LLC – CM61-BEAD-AL-3

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000282	Fiber	864	$7,171.79	0

Summary of extenuating circumstances

- This project will connect 763 unserved and 101 underserved BSLs in Barbour County, near the city of Clio, the towns of Bakerhill, Blue Springs, Clayton, and Louisville, and the unincorporated communities of Batesville and Teals Crossroads.
- New fiber deployment will follow a combination of state highways and local roads to extend existing infrastructure to connect the eligible locations. All of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial

deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.

- Eligible locations in Barbour County are linearly clustered near the communities listed above, as well as the neighborhood of Bells Crossroads, Lime Sink, Osco, Sandy Point, Texasville, and Tyler Crossroads. Outside of concentrations in Clayyon and Bells Crossroads, those clusters are separated by several miles. Many of the outlying locations sit on large land parcels because the outlying land use is focused on agricultural production, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Choctawhatchee River.
- Barbour County lies within Alabama's East Gulf Coastal Plain, underlain by sandy, silty, and clay-rich materials. These soils are generally easy to excavate but lack cohesion, causing trench wall collapse in saturated conditions. Fiber installation requires trench stabilization, firm bedding and compaction, and watertight conduit systems to prevent settlement and infiltration in weak soils.
- Upland soils are red and yellow clays that expand when wet and shrink when dry, while low-lying areas near the Chattahoochee River and Pea River basins contain loose sandy alluvium prone to erosion. Construction must balance methods between moisture control and strong compaction in uplands, and erosion protection and trench reinforcement in lowlands, to maintain long-term trench stability.
- Barbour County receives about 55 inches of annual precipitation, with frequent stormwater saturation and shallow groundwater in bottomlands. These conditions can cause trench flooding, soft subgrades, and conduit buoyancy in wet areas. Construction is generally scheduled for drier months, employing directional drilling for stream crossings and installing trench plugs, sump-equipped vaults, and erosion-control measures to ensure durability,
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.
- ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Bibb County:
Bellsouth Telecommunications, LLC – CM61-BEAD-AL-4

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000397-1	Fiber	154	$10,000.00	0

Summary of extenuating circumstances

- This project will connect 132 unserved and 22 underserved BSLs in Bibb County, near the towns of McCulley Creek, Flat Top, Shawtown, and West Blocton, and the unincorporated community of Gary Springs.
- The network deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. More than 70% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Bibb County can be found in small clusters near the communities listed above, as well as the neighborhoods of Bibbville, Docray, Duff Settlement, and Harrisburg. However, those clusters are widely distributed and generally separated by several miles. Many of the outlying locations sit on large land parcels used for agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Cahaba River and its tributaries.
- Bibb County lies along Alabama's Fall Line, where hard metamorphic and igneous rocks of the

Piedmont transition into the softer sandstones, shales, and clays of the Coastal Plain. Excavation difficulty changes rapidly. Upland ridges are underlain by quartzite and schist require rock trenchers or directional drilling, while valley floors with sandy or clayey soils are easier to excavate but require stabilization and compaction to prevent settlement. Careful route planning is essential to manage these contrasting ground conditions.

- Much of the county's surface material, particularly in upland areas, consists of red and yellow clayey soils derived from weathered crystalline rock. These soils expand when wet and harden when dry, making trenching and compaction difficult in both wet and dry seasons. Fiber installation must include proper bedding, flexible conduit systems, and compaction during moderate moisture conditions to minimize soil movement and conduit deformation.
- Bibb County receives around 55 inches of annual precipitation, with steep hills and deeply incised valleys that promote runoff and erosion. Open-trench construction in these areas must use strong erosion- and sediment-control practices and watertight conduit systems in low-lying zones to prevent infiltration, washouts, and conduit exposure during storms.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Calhoun County:
Comcast Cable Communications Management LLC – CM61-BEAD-AL-8

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000323	Fiber	1,193	$8,342.28	42

Summary of extenuating circumstances

- This project will connect 960 unserved and 233 underserved BSLs in Calhoun County, near the city of Piedmont, the town of West Point, and the unincorporated communities of Choccolocco, Iron City, Merrellton, Middleton, and White Plains.
- The network deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 60% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations are generally distributed in the north and east of the county, with fewer locations in the west. Clusters of BSLs with low linear density are in and near the communities listed above, as well as the unserved and underserved neighborhoods of Allsop, Colwell, Couch, Crystal Springs, Duke, Grayton, Greenwood, Harmony, Hallingworth, Ladiga, Maxwellborn, McClellan, Mount Polk, Old Davisville, Pleasant Ridge, Piedmont Springs, Pricketville, Rabbittown, Reads Mill, Webster Chapel, and Whites Gap. These clusters widely spaced across the county. Agriculture dominates the north and east of the project area, with many locations sitting on large land parcels, further lowering location density.
- Calhoun County lies within Alabama's Appalachian Ridge and Valley Province, where narrow valleys of limestone and shale alternate with resistant sandstone and quartzite ridges. Excavation conditions range from hard rock on ridges to softer but karst-prone soils in valleys. Fiber routes must follow existing road corridors or valley floors where possible, using directional drilling or rock trenchers in upland zones to maintain consistent burial depth and minimize slope instability.
- Upland soils are red, loamy clays derived from weathered sandstone and shale, while valley soils

are deeper but can be poorly drained. These materials become slick and unstable when wet and extremely hard when dry, complicating trenching and compaction. Construction requires moisture conditioning, stable bedding materials, and flexible conduit systems to ensure trench integrity and prevent deformation.

- Calhoun County receives roughly 55 inches of annual precipitation, with steep slopes and valleys that promote runoff, soil loss, and washouts during heavy rain. Fiber installation must include erosion- and sediment-control measures and watertight conduit systems in flood-prone valleys to prevent infiltration, buoyancy, and conduit exposure during storms.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Chilton County:
Premier Holdings, LLC – CM61-BEAD-AL-11

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000317	Fiber	2,005	$10,307.74	16

Summary of extenuating circumstances
As a result of ADECA's negotiations, this award is now below $10,500 per location. ADECA seeks guidance on any further actions required. We believe the following price justification is reasonable for keeping the project as it is.

- This project will connect 1,241 unserved and 765 underserved BSLs in Chilton County, near the cities of Clanton and Jemison, the towns of Oak Grove and Thorsby, and the unincorporated community of Verbena.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 15% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations are generally clustered linearly in unserved and underserved neighborhoods (such as Center Hill, Collins Chapel, Cooper, Falakto, Gap of the Mountain, Kalona, Midway, Minooka, Ocampo, and Wessington). However, this is a large project area, and these clusters are separated by several miles, lowering the overall location density of the project.
- There are numerous water crossings in the project area, as part of the region's drainage into the Coosa River, east of the project area.
- Chilton County sits along Alabama's Fall Line, where the hard rocks of the Piedmont transition into the softer formations of the Coastal Plain. Northern and eastern areas feature shallow, rocky soils hard rock, making excavation slow and requiring mechanical rock trenchers or directional drilling. In contrast, the southern county's soft sandy and clay-rich sediments allow easier trenching but require stabilization and compaction to prevent settling and conduit deformation.
- Much of the county's surface material consists of silty, plastic clays. These soils expand when wet and shrink when dry, leading to seasonal volume changes that can shift or crack buried conduit. Fiber construction must ensure stable bedding, proper compaction, and flexible conduit materials, with construction ideally timed for moderate moisture conditions to minimize soil movement.
- Chilton County experiences annual precipitation exceeding 55 inches and a mix of steep hills and deeply incised drainages. As a result, the region is prone to surface erosion and localized flooding during

storms. Open trenching requires strong erosion- and sediment-control measures and watertight conduit systems in flood-prone zones to maintain long-term fiber reliability.

- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.
- ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Clarke County:
Bellsouth Telecommunications, LLC – CM61-BEAD-AL-13

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000408	Fiber	779	$10,000.00	0

Summary of extenuating circumstances

- This project will connect 691 unserved and 88 underserved BSLs in Clarke County, near the city of Jackson and the unincorporated communities of Alma and Walker Springs.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 85% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations are linearly clustered near unserved and underserved neighborhoods (such as May's Crossroads and McVay) and the communities listed above. However, this is a large project area, and these clusters are separated by several miles, lowering the overall location density of the project. In addition, land parcels tend to be larger given the emphasis on agriculture in the project area, further lowering location density.
- There are numerous water crossings in the project area, as part of the region's drainage into the Tombigbee River, on the western border of Clarke County
- Clarke County lies within Alabama's Gulf Coastal Plain, where the subsurface is dominated by sands, silts, and clays. These soft soils are easy to excavate but lack cohesion and can cause trench walls to slump in wet conditions. Fiber installation requires shoring or trench boxes in unstable areas, proper compaction, and bedding to prevent settlement or conduit displacement.
- The county's uplands contain red and yellow clayey soils that retain water and expand when saturated. Construction requires firm compaction in clays and reinforced conduit to maintain trench stability and long-term conduit integrity.
- Clarke County receives more than 60 inches of annual rainfall, with frequent flooding and high groundwater levels in river valleys and wetlands. Fiber construction in these low-lying areas is generally limited to drier months and requires watertight conduit systems, trench plugs, and sump-equipped handholes to prevent water infiltration. In many cases, directional boring is used for water crossings to reduce disturbance and maintain protect fiber and conduit deployed in saturated ground conditions.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Cleburne County:

Premier Holdings, LLC – CM61-BEAD-AL-15

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000319	Fiber	2,055	$9,999.00	13

Summary of extenuating circumstances

As a result of ADECA's negotiations, this award is now below $10,500 per location. ADECA seeks guidance on any further actions required. We believe the following price justification is reasonable for keeping the project as it is.

- This project will connect 745 unserved and 1,328 underserved BSLs in Cleburne County, near the city of Heflin, the towns of Edwardsville, Fruithurst, and Ranburne, and the unincorporated communities of Abernathy, Hollis Crossroads, Muscadine, and Trickem.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 15% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations are somewhat clustered near unserved and underserved neighborhoods (such as Bell Mills, Belltown, Chulafinnee, Five Points, Hightower, Hopewell, Lebanon, Leota, Macedonia, Mount Pleasant, Piney Woods, and Plainview) and the communities listed above. However, these clusters are separated by several miles, lowering the overall location density of the project. In addition, land parcels tend to be larger given the emphasis on agriculture in the project area, particularly in the southern project area, further lowering location density.
- There are numerous small water and creek crossings in the project area
- Cleburne County lies in Alabama's Piedmont region, characterized by rugged hills, narrow valleys, and thin soils developed over metamorphic rocks. Excavation is difficult in these areas due to frequent encounters with bedrock, requiring rock trenchers, pneumatic hammers, or directional drilling for fiber installation, especially along ridgelines or cut slopes.
- Upland soils are typically red clays underlain by weathered crystalline rock. These soils are cohesive but poorly drained, becoming slick and unstable during wet weather and extremely hard when dry. Construction timing and proper trench stabilization, compaction, and bedding are essential to ensure conduit stability and prevent washouts or deformation.
- Cleburne County receives more than 55 inches of annual precipitation, leading to surface runoff, rill erosion, and slope instability. Fiber construction in these conditions must include erosion- and sediment-control measures and may require watertight conduit systems in low-lying or flood-prone areas to maintain long-term reliability.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Coffee County:

Connect Holding II LLC – CM61-BEAD-AL-16

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000223	Fiber	347	$5,936.55	2

Summary of extenuating circumstances

- This project will connect 299 unserved and 48 underserved BSLs in Coffee County, near the cities of Elba and Enterprise, and the unincorporated communities of Basin, Battens Crossroads, Central

City, Clintonville, Curtis, Damascus, Frisco, Richburg, Roeton, and Tabernacle. The project will also support the western side of the Army's base at Fort Rucker.

- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 5% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations in Coffee County are widely distributed, with limited clusters in and near the communities named above, as well as unserved and underserved neighborhoods of Chestnut Grove, Clowers Crossroads, Lowry Mill, New Hope, and Shady Grove. However, these clusters are much less dense than others in Alabama, and the clusters are separated by several miles, lowering the overall location density of the project. In addition, land parcels tend to be larger given the emphasis on agriculture in much of the project area, further lowering location density.
- Coffee County is in Alabama's East Gulf Coastal Plain, where surface materials consist primarily of sands, silts, and clays. These soft sediments are easy to excavate but often lack cohesion, causing trench walls to slump or collapse in wet conditions. Fiber installation requires trench stabilization, proper compaction, and bedding to prevent settlement or conduit deformation.
- Upland areas contain red and yellow clay soils that expand when wet and contract when dry. Valley bottoms and stream terraces contain loose soils prone to erosion. Construction methods must adjust accordingly, using moisture conditioning and firm compaction in clayey areas, and erosion control and bedding stabilization in sandy zones, to maintain trench integrity and long-term conduit stability.
- Coffee County receives roughly 55 inches of rainfall annually, with perched water tables and poorly drained soils common in low-lying zones like the Pea River, which roughly bisects the project area. These wet conditions limit winter construction and increase the risk of trench flooding or conduit buoyancy. Fiber projects are typically scheduled during drier months, employing watertight conduit systems, trench plugs, and sump-equipped handholes in flood-prone or saturated areas to ensure durability and prevent water intrusion.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA. ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Colbert County:
Comcast Cable Communications Management LLC – CM61-BEAD-AL-17

Application ID	Tech	BSLs	Cost /BSL	CAI
App-000325	Fiber	1,010	$7,379.96	35

Summary of extenuating circumstances

- This project will connect 774 unserved and 236 underserved BSLs in Colbert County, near the cities of Muscle Shoals, Sheffield, and Tuscumbia, the towns of Cherokee, Leighton, and Littleville, and the unincorporated communities of Barton, Chisca, Emco-Listerhill Junction, Ford City, Lakeview, Ligon Springs, Lime Rock, and Pride. Approximately 47% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach

offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.

- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations.
- Eligible locations in Colbert County are widely distributed, with limited clusters in and near the communities named above, as well as unserved and underserved neighborhoods of Cave Spring, Colbert Heights, Lime Kiln, Malone, New Bethel, and Old Bethel. However, these clusters are much less dense than others in Alabama and the clusters are separated by several miles, lowering the overall location density of the project. In addition, land parcels tend to be larger given the emphasis on agriculture in much of the project area, further lowering location density. Finally, the region is crisscrossed with small waterways, as the region drains into the nearby Tennessee River to the north.
- Colbert County lies within the Highland Rim and Tennessee River Valley, where uplands are underlain by limestone, chert, and dolostone and valleys contain soft, fine-grained alluvium. Excavation on uplands is challenging due to shallow bedrock and cherty soils that require mechanical rock trenchers or directional drilling equipment, while lowlands are easier to trench but prone to settlement if poorly compacted. Fiber routes must balance constructability with access and stability across these contrasting terrains.
- Much of the county's subsurface consists of soluble limestone and dolostone, producing sinkholes, cavities, and irregular drainage patterns. These karst features create potential for ground settlement or void collapse around buried conduit. Fiber installation should use flexible conduit systems, stable bedding, and route planning to avoid active sinkholes and ensure long-term system integrity in variable limestone terrain.
- Colbert County receives around 55 inches of rainfall annually, with frequent flooding along the Tennessee River and its tributaries. Low-lying floodplains have poorly drained silty and clayey soils that can saturate quickly and reduce trench stability. Construction in these areas should be scheduled for dry seasons, using watertight conduit systems, trench plugs, and erosion- and sediment-control measure to prevent infiltration, buoyancy, and washouts.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Conecuh County:
SP Broadband Inc, CM61 – BEAD-AL-18

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000280	Fiber	3,136	$7,242.19	14

Summary of extenuating circumstances

- This project will connect 2,487 unserved and 649 underserved BSLs in Conecuh County, near the city of Evergreen, the towns of Castleberry and Repton, and the unincorporated communities of Belleville, Brooklyn, Burnt Corn, Cohassett, Johnsonville, Nymph, Paul, Rabb, and Sand Cut.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 15% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations in Conecuh County are very widely distributed, with linear clusters in and near

the communities named above, as well as unserved and underserved neighborhoods of Fairnelson, Fairview, Fowler, Georgiaville, Green Street, Harper's Store, Lyeffion, Loree, Melrose, Old Town, Owassa, Pine Orchard, Ramah, Shreve, and Travis Bridge. The overall location density is very low, with small numbers of BSLs distributed across miles of roads. In addition, land parcels tend to be larger given the emphasis on agriculture in much of the project area, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the West Sepulga River to the east and the Conecuh River further to the south.

- Conecuh County lies within Alabama's Gulf Coastal Plain, where the surface geology consists of loose sands, silts, and clays. These soft materials are generally easy to excavate but lack cohesion, making trenches prone to wall collapse in wet conditions. Fiber construction requires proper trench stabilization, compaction, and bedding to prevent settlement and conduit deformation, especially during high-moisture periods.
- The county's uplands contain red and yellow clay soils that expand when wet and harden when dry, while low-lying areas feature sandy, well-drained soils that erode easily. Construction techniques must adapt to these changing soil types, using moisture control and firm compaction in clays, and erosion-control and bedding reinforcement in sands, to ensure trench stability and long-term conduit protection.
- Conecuh County receives roughly 60 inches of annual rainfall, with frequent heavy storms that cause saturated soils and localized flooding. These wet conditions can fill trenches or destabilize slopes during excavation. Fiber projects are generally timed for drier months and utilize watertight conduit systems, trench plugs, and sump-equipped handholes in flood-prone or saturated areas to prevent infiltration, buoyancy, and long-term water damage.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Coosa County:
Windstream Alabama, LLC – CM61-BEAD-AL-19

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000308	Fiber	514	$5,627.58	0

Summary of extenuating circumstances

- This project will connect 369 unserved and 145 underserved BSLs in Coosa County, near the unincorporated communities of Equality, Hissop, and Nixburg.
- New fiber deployment will follow a combination of state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 98% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Coosa County are very widely distributed, with linear clusters in and near the communities named above, as well as the neighborhood of Cottage Grove and near Martin Lake. The overall location density is very low, with small numbers of BSLs distributed across miles of roads. In addition, land parcels tend to be larger given the emphasis on agriculture in much of the project area, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into Martin Lake in the southeast of the project area.
- Coosa County lies within Alabama's Piedmont region, where rugged uplands are underlain by

hard metamorphic rocks. Thin, rocky soils and frequent bedrock outcrops make excavation difficult and unpredictable. Fiber routes must account for rocky zones requiring rock trenchers, pneumatic hammers, or directional drilling. Route alignments should favor existing road corridors or valley bottoms where soils are thicker and more stable.

- The county's dominant soil types are red clays that expand when wet and harden significantly when dry. These properties complicate trenching and backfill compaction, creating risks of conduit deformation or settlement. Fiber installation requires moisture conditioning, firm compaction, and stable bedding materials to maintain trench integrity and protect conduit against seasonal soil movement.
- Coosa County receives more than 55 inches of annual precipitation, leading to surface runoff, slope erosion, and sediment transport. Construction on steep slopes and near drainageways must include erosion- and sediment-control measures and watertight conduit systems to prevent infiltration and maintain long-term durability in the county's wet, highly erodible terrain.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Crenshaw County:
Connect Holding II LLC – CM61-BEAD-AL-21

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000227	Fiber	466	$7,951.02	0

Summary of extenuating circumstances

- This project will connect 435 unserved and 31 underserved BSLs in Crenshaw County, near the cities of Brantley and Luverne, the towns of Glenwood, Petrey, and Rutledge, and the unincorporated communities of Mulberry, and Theba.
- New fiber deployment will follow a combination of state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 11% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations in Crenshaw County are very widely distributed, with linear clusters in and near the communities named above, as well as the neighborhoods of Bullock, Centenary, Fullers Crossroads, Ivy Creek, Live Oak, Merrill Mill, New Hope, Patsburg, Vernledge, Vidette, and Weed Crossroad. The overall location density is very low, with small numbers of BSLs distributed across miles of roads. In addition, land parcels tend to be larger given the emphasis on agriculture in much of the project area, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Conecuh River and Gantt Lake.
- Crenshaw County lies within Alabama's East Gulf Coastal Plain, where the surface geology consists of sandy, silty, and clay-rich soils. These materials are easy to excavate but lack cohesion, causing trench walls to slump or collapse in wet conditions. Fiber installation requires trench stabilization, proper compaction, and consistent bedding to prevent settlement and maintain conduit alignment.
- The upland soils are dominated by red and yellow clays that expand when wet and contract when dry. Stream valleys and bottomlands feature loose, sandy soils prone to erosion. Construction must adjust methods accordingly, by using moisture conditioning and strong compaction in clay-rich areas and erosion-control and trench reinforcement in sandy zones, to ensure long-term stability.
- The region receives more than 55 inches of rainfall annually, with frequent heavy storms that

saturate soils and raise groundwater levels. These wet conditions increase the risk of flooding, soil sloughing, and conduit buoyancy. Construction is typically scheduled during drier months, with watertight conduit systems, trench plugs, and erosion- and sediment-control measures, especially near drainageways and flood-prone corridors.

- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Cullman County:
Bellsouth Telecommunications, LLC – CM61-BEAD-AL-22

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000402	Fiber	368	$9,999.00	0

Summary of extenuating circumstances
As a result of ADECA's negotiations, this award is now below $10,500 per location. ADECA seeks guidance on any further actions required. We believe the following price justification is reasonable for keeping the project as it is.

- This project will connect 322 unserved and 73 underserved BSLs in Cullman County, near the cities of Cullman and Good Hope the town of Berlin, and the unincorporated communities of Crane Hill, Logan, and Pleasant Ridge.
- New fiber deployment will follow a combination of state and federal highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 75% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Crenshaw County are very widely distributed, with linear clusters in and near the communities named above, as well as the neighborhoods of Ardell, Cold Springs, Grandview, Johnsons Crossing, Mount Zion, Nesmith, and Sulphur Springs. The overall location density is very low, with small numbers of BSLs distributed across miles of roads. In addition, land parcels tend to be larger given the emphasis on agriculture in much of the project area, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into Lewis Smith Lake and Lake Catoma.
- Cullman County sits atop the southern Cumberland Plateau, where flat uplands are underlain by sandstones and shales, and valleys are carved into softer limestone and clay formations. Hard sandstone and conglomerate layers create hard-dig zones on uplands, requiring rock trenchers or directional drilling, while valley soils are easier to excavate but may contain sinkhole-prone limestone requiring careful route selection and stable bedding.
- The region's dominant soils are red clays that expand when wet and harden when dry. These conditions make trenching difficult in both wet and dry seasons, leading to wall instability or compaction challenges. Fiber installation requires moisture conditioning, firm backfill compaction, and flexible conduit materials to accommodate seasonal soil volume changes and maintain alignment.
- Cullman County receives more than 55 inches of annual precipitation, resulting in saturated soils, runoff, and erosion on sloped terrain. Open trenching on hillsides and near drainageways must include strong erosion- and sediment-control measures and watertight conduit systems in flood-prone zones to prevent infiltration, buoyancy, and conduit exposure during heavy rain events.
- The combination of ground conditions, waterways, and location distribution result in higher total

deployment costs than other projects awarded by ADECA.
ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Dale County:
Spectrum Southeast, LLC – CM61-BEAD-AL-23

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000353	Fiber	1,093	$8,700.38	0

Summary of extenuating circumstances

- This project will connect 888 unserved and 205 underserved BSLs in Conecuh County, near the cities of Daleville and Ozark, the towns of Clayhatchee, Grimes, Newton, and Pinckard, and the unincorporated communities of Bells Crossroads, Browns Crossroad, Echo, Ewell, Kelly, Mabson, Snow Hill, and Sylvan Grove.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 30% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Dale County are very widely distributed, with linear clusters in and near the communities named above, as well as the unserved and underserved neighborhoods of Asbury, Barefield Crossroads, Beamon, Clopton, Dykes Crossroad, Lewis, Skipperville, and Waterford. The overall location density is very low, with small numbers of BSLs distributed across miles of roads. Agriculture dominates land use in the project area, with large land parcels that also lower the location density. Finally, the region is crisscrossed with small waterways that drain into the Choctawhatchee River and its tributaries.
- Dale County lies entirely within Alabama’s East Gulf Coastal Plain, where surface materials consist of loose sands, silts, and clays. These soft sediments are easy to excavate but lack cohesion, leading to trench wall collapse and settlement in wet conditions. Fiber construction requires trench stabilization, proper compaction, and uniform bedding to prevent conduit deformation and maintain grade in variable soils.
- Upland soils consist of red and yellow clays that expand when wet and shrink when dry, while valley and floodplain areas contain loose, sandy alluvium that erodes easily during heavy rain. Construction methods must adapt to these contrasts, by using moisture control and firm compaction in clay-rich areas, and erosion-control and trench reinforcement in sandy zones, to ensure long-term trench stability and prevent washouts.
- Dale County receives more than 55 inches of annual rainfall, with frequent thunderstorms that saturate soils and flood bottomlands along the Choctawhatchee River and its tributaries. These conditions limit winter construction and increase the risk of trench flooding and conduit buoyancy. Fiber projects are typically be scheduled for drier months and employ watertight conduit systems, trench plugs, and erosion- and sediment-control measures near waterways to maintain long-term performance.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Dallas County:
Bellsouth Telecommunications, LLC – CM61-BEAD-AL-24

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000409	Fiber	1,487	$9,720.00	0

Summary of extenuating circumstances

- This project will connect 1,343 unserved and 144 underserved BSLs in Dallas County, near the city of Selma and the unincorporated communities of Beloit, Burnsville, Sardis, Summerfield, and Tyler.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. More than 80% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations are linearly clustered near unserved and underserved neighborhoods (such as Brantley, Casey, Fremont, Mount Nebo, Old Town, Polk, Potter) and the communities listed above. However, this is a large project area, and these clusters are separated by several miles, lowering the overall location density of the project. Outlying land parcels tend to be larger given the emphasis on agriculture those areas, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Alabama River.
- Dallas County lies within Alabama's Coastal Plain "Black Belt" region, underlain by sedimentary rocks overlain by expansive clay soils. These clays expand dramatically when wet and shrink when dry, causing trench movement, settlement, and cracking. Fiber installation requires stable bedding, flexible conduit materials, and careful backfill compaction, ideally performed during moderate moisture conditions to minimize soil expansion or contraction.
- The sedimentary formations beneath the Black Belt soils are soft and easily excavated but have extremely low permeability, causing water to pond and saturate near-surface soils after rainfall. As a result, trench walls can slump in these materials and dewatering may be required in low-lying areas. Construction should include watertight conduit systems, trench plugs, and proper drainage design to prevent infiltration and buoyancy in persistently saturated ground.
- Dallas County receives about 55 inches of rainfall annually, with numerous floodplains along the Alabama River and its tributaries. These areas experience seasonal flooding and shallow groundwater, making open-trench construction challenging during wet months. Fiber projects are typically scheduled for late spring to early fall, using directional drilling for stream crossings and implementing erosion- and sediment-control measures—such as silt fencing and stabilized trench backfill—for long-term conduit protection.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

DeKalb County:
Farmers Telecommunications Corporation – CM61-BEAD-AL-25

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000212	Fiber	266	$9,890.15	0

Summary of extenuating circumstances

- This project will connect 252 unserved and 14 underserved BSLs in DeKalb County, near the city of Fort Payne, the towns of Hammondville, Mentone, and Pine Ridge and the unincorporated communities of Adamsburg, Dog Town, Loveless, and Sulphur Springs.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 70% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in DeKalb County are widely distributed, with limited clusters in and near the communities listed above, as well as unserved and underserved neighborhoods of Bankhead, Blake, and Pumpkin Center. However, these clusters are much less dense than others in Alabama and the clusters are separated by several miles, lowering the overall location density of the project. The project area is dominated by the topography of the Big Ridge and its adjacent features, including the Big Willis Valley, Railroad Valley, Middle Ridges, and Sand Valley. These terrain features limit the available routes through the project area, necessitating additional construction to connect outlying communities and locations. Many large land parcels dominate the southeastern half of the project area, because of an emphasis on agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the valleys and Weiss Lake to the south.
- DeKalb County lies on the southern end of the Cumberland Plateau and Lookout Mountain, where rugged topography and thin soils overlie hard bedrock. Excavation is slow and equipment-intensive, requiring mechanical rock trenchers, pneumatic hammers, or directional drilling in rocky zones. Fiber routes generally follow existing road corridors or ridge benches, where soils are thicker and slopes are more stable to minimize excavation and erosion risks.
- The region's soils developed from sandstone and shale parent material, producing red clays that are moderately well-drained but prone to compaction and runoff during heavy rains. These soils become slick and unstable when wet and extremely hard when dry, requiring moisture conditioning, strong compaction, and stable bedding materials to ensure conduit alignment and long-term trench integrity.
- DeKalb County receives more than 55 inches of precipitation annually, and the topography features steep slopes that accelerate surface runoff and erosion. Fiber construction must include erosion- and sediment-control measures and watertight conduit systems in low-lying or flood-prone valleys. Scheduling work during drier seasons and stabilizing disturbed slopes are essential to prevent washouts and maintain conduit stability in this region.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Elmore County:
Windstream Alabama, LLC – CM61-BEAD-AL-26

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000309	Fiber	865	$5,864.58	0

Summary of extenuating circumstances

- This project will connect 236 unserved and 629 underserved BSLs in Elmore County, near the town of Eclectic and the unincorporated communities of Central, Kent, and Seman.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 75% of the fiber in this

project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.

- Eligible locations are generally clustered linearly in unserved and underserved neighborhoods and communities (such as Cotton, Dexter, Glendale Acres, Good Hope, Kid, Jordan, Red Hill, Santuck, and Wallsboro). However, these clusters are separated by up to several miles, lowering the overall location density of the project. Agriculture dominates land use in the areas outside of community centers, featuring large land parcels that lower the location density. Finally, the region is crisscrossed with small waterways that drain into the Jordan Lake, Martin Lake, and the Coosa River.
- Elmore County straddles Alabama's Fall Line, where the rocks of the Piedmont transition into the softer sands and clays of the Coastal Plain. Excavation difficulty varies sharply. The hard bedrock and thin soils in the northeast of the county – where the project is focused – require mechanical rock trenchers or directional drilling, while soft sediments in the southwest are easily trenched but need stabilization and compaction to prevent settlement. Careful route planning is essential to manage this geologic variability.
- Much of the county's upland soils are red clays derived from weathered rock, while lower-lying areas contain more plastic, poorly drained clays and silts. These soils expand when wet and contract when dry, creating potential for trench deformation and conduit misalignment. Fiber installation must include consistent bedding, firm compaction, and flexible conduit systems to accommodate seasonal soil movement.
- Elmore County receives more than 55 inches of annual precipitation, with periodic flooding along the Coosa and Tallapoosa Rivers and their tributaries. These wet conditions can lead to trench wall collapse, water infiltration, and buoyancy issues in floodplains. Construction is typically scheduled for drier months, employing watertight conduit systems, trench plugs, and erosion- and sediment-control measures to maintain stability.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

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Escambia County:
SP Broadband Inc – CM61-BEAD-AL-27

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000289	Fiber	1,369	$7,838.76	15

Summary of extenuating circumstances

- This project will connect 1,263 unserved and 106 underserved BSLs in Escambia County, near the cities of Brewton and East Brewton, the town of Poarch, and the unincorporated communities of Boykin, Jack Springs, Parker Springs, and Spring Hill. The project area includes the Poarch Creek Reservation, home of the federally recognized Poarch Band of Creek Indians.
- New fiber deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 15% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations in Escambia County are widely distributed, with limited clusters in and near

the communities listed above, as well as unserved and underserved neighborhoods of Appleton, Barnett Crossroads, Bradley, Damascus, Ewing Farms, Keego, Kirkland, McCullough-Hjuxford, Roberts, and Rock Hill. The project area spans most of Escambia County, resulting in much lower location density than other projects, with groups of locations separated by several miles. Many of the outlying locations sit on large land parcels because of an emphasis on agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Conecuh River and its tributaries.

- Escambia County lies entirely within Alabama's Gulf Coastal Plain, where the surface geology consists of loose sands, silts, and clays. These materials are easy to excavate but lack cohesion, causing trench walls to slump or collapse when saturated. Fiber construction requires proper trench stabilization, compaction, and bedding to maintain conduit alignment and prevent settlement in soft, moisture-sensitive soils.
- Upland areas feature well-drained, loose sandy soils, while lowlands near the Conecuh River contain clayey, poorly drained sediments that retain water. In sandy zones, trench backfill must be stabilized to prevent erosion or conduit exposure. In clay-rich areas, watertight conduit and moisture control are needed to avoid expansion, shrinkage, and trench deformation.
- The county receives about 60 inches of rainfall annually, with numerous creeks, wetlands, and floodplains that maintain high water tables during wet months. These conditions increase the risk of trench flooding and buoyancy in buried conduit. Construction must be timed for drier seasons, using trench plugs, sump-equipped handholes, and directional drilling for stream or wetland crossings to ensure system integrity.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

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Etowah County:
Comcast Cable Communications Management LLC – CM61-BEAD-AL-28

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000326	HFC	1,167	$10,205.15	28

Summary of extenuating circumstances
As a result of ADECA's negotiations, this award is now below $10,500 per location. ADECA seeks guidance on any further actions required. We believe the following price justification is reasonable for keeping the project as it is.

- This project will connect 924 unserved and 243 underserved BSLs in Etowah County, near the cities of Attalla, Gadsden, and Glencoe, the town of Sardis City, and the unincorporated communities of Coats Bend, Gallant, Ivalee, Keener, and Whitesboro.
- The network deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 60% of the fiber and coaxial cable in this project will be installed underground. Buried infrastructure has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Etowah County are widely distributed, with clusters of low linear density in and near the communities listed above, as well as unserved and underserved neighborhoods of Bachelors

Chapel Cave Springs, Cox Gap, Daisy, Mays, Moragne, Murrycross, Noble Hill, Owens, Ramsey, Shiloh, Smiths Crossroads, and Sonoma. The project area spans most of Etowah County, resulting in lower location density than other projects, with groups of locations separated by several miles. Many of the outlying locations sit on large land parcels used for agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Coosa River and its tributaries.

- Etowah County lies within Alabama's Ridge and Valley Province, characterized by alternating sandstone ridges and limestone or shale valleys. Hard rock on ridges creates hard-dig zones requiring mechanical rock trenchers or directional drilling, while valleys may contain karst features such as sinkholes or voids that increase the risk of conduit settlement. Cable routes must be carefully aligned to avoid unstable or karst-prone zones and ensure consistent burial depth.
- The dominant soils are red, loamy clays derived from weathered sandstone and shale. These soils are cohesive but become slick and unstable when wet and extremely compact when dry, complicating trenching and compaction. Cable deployment requires moisture control, proper bedding and backfill, and flexible conduit systems to accommodate seasonal shrink–swell cycles and prevent deformation.
- Etowah County receives more than 55 inches of annual precipitation, and steep topography in upland areas accelerates runoff and erosion. Construction on slopes or near waterways must include robust erosion- and sediment-control measures and watertight conduit systems in flood-prone valleys to prevent infiltration, buoyancy, and conduit exposure during heavy rain events.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Geneva County:
Connect Holding II LLC – CM61-BEAD-AL-29

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000234	Fiber	386	$6,372.38	12

Summary of extenuating circumstances

- This project will connect 204 unserved and 182 underserved BSLs in Geneva County, near the cities of Geneva, Hartford, Samson, and Slocomb, the towns of Eunola and Malvern, and the unincorporated communities of Bailey Crossroads, Fadette, Hacoda, Highfalls, and Highnote.
- New fiber deployment will follow a combination of state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 9% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations in Geneva County are distributed county-wide, with limited clusters of linear density in and near the communities listed above, as well as the neighborhood of Lowery. Since the project area spans most of the county, the project has lower location density than other projects, with groups of locations separated by several miles. Many of the outlying locations sit on large land parcels because of an emphasis on agriculture in the county, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Choctawhatchee River and the Pea River, which meet at the city of Geneva.
- Geneva County lies within Alabama's East Gulf Coastal Plain, where the subsurface consists of loose sands, silts, and clays. These soft soils are easy to excavate but prone to slumping or collapse during wet conditions. Fiber installation requires careful trench stabilization, proper bedding, and firm

compaction to prevent settlement and maintain conduit alignment in these weak, moisture-sensitive materials.

- Upland soils are well-drained, loose sands that erode easily, while the lowlands along the Choctawhatchee River and its tributaries contain dense, clay-rich sediments that retain water. Construction methods must adapt to these contrasting conditions, by reinforcing trenches and backfill in sandy areas to prevent washouts and using watertight conduit and dewatering controls in clay-rich or flood-prone zones to avoid infiltration and buoyancy.
- Geneva County receives approximately 60 inches of annual precipitation, with frequent flooding along the Choctawhatchee River basin and its tributaries. These wet conditions can cause trench flooding, soil instability, and access limitations during construction. Fiber projects are typically scheduled for drier months and incorporate directional drilling for stream and wetland crossings, along with trench plugs, sump-equipped vaults, and erosion-control measures to protect conduit integrity.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

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Greene County:
MStreet Fiber Alabama, LLC – CM61-BEAD-AL-30

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000262	Fiber	310	$8,369.90	11

Summary of extenuating circumstances

- This project will connect 309 unserved BSLs and one underserved BSL in Greene County, near the city of Eutaw, the towns of Birdeye and Forkland, and the unincorporated community of Tishabee. The project also connects locations along the Black Warrior River on the county's southern border, north of the city of Demopolis.
- The network deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 4% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations can be found in low linear density clusters in and near the communities listed above, as well as the neighborhoods of Hycutt and Old Bluffport. The project is concentrated in south-central Greene County and focused on serving widely distributed outlying locations separated from those clusters by several miles. Many of the outlying locations sit on large land parcels used for agriculture, further lowering location density. Finally, the project area is crisscrossed with small waterways that drain into the Black Warrior River and its tributaries.
- Greene County lies within Alabama's Coastal Plain "Black Belt" region, underlain by sedimentary rock. These materials weather into highly expansive clay soils that swell when wet and shrink when dry, causing trench movement and conduit stress. Fiber installation requires flexible conduit systems, stable bedding, and backfill compaction timed for moderate soil moisture to prevent deformation and settlement.
- The sedimentary rock beneath the Coastal Plain is soft and easy to excavate but exhibits very low permeability, resulting in ponding and prolonged saturation after rain. Trench walls can slump in these cohesive, moisture-retaining soils, requiring shoring or trench boxes in deeper excavations. Construction in these areas must include watertight conduit, trench plugs, and surface drainage design to prevent infiltration and buoyancy.

- Greene County receives more than 55 inches of annual precipitation, with poorly drained bottomlands and floodplains. Seasonal flooding can submerge trenches and increase erosion risk. Fiber routes in these areas should rely directional drilling beneath waterways and employ erosion- and sediment-control measures to ensure long-term system integrity.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Hale County:
MStreet Fiber Alabama, LLC – CM61-BEAD-AL-31

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000294	Fiber	718	$8,680.82	16

Summary of extenuating circumstances

- This project will connect 654 unserved and 64 underserved BSLs in Hale County, near the city of Greensboro, the towns of Arcola and Gallion, and the unincorporated communities of Lock Five, Sawyerville, and Wedgeworth.
- New fiber deployment will follow a combination of state highways and local roads to extend existing infrastructure to connect the eligible locations. Only 1% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations in Hale County are linearly clustered near the communities listed above, particularly Greensboro, as well as the neighborhoods of Laneville, River Bend, and Rosemary. However, those clusters are widely distributed and generally separated by several miles. Many of the outlying locations sit on large land parcels because the outlying land use is focused on agricultural production, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Black Warrior River.
- Hale County sits within Alabama's Coastal Plain "Black Belt," where underlying sedimentary rocks weather into dense, plastic clays. These soils expand when wet and shrink when dry, causing trench deformation, settlement, and conduit misalignment. Fiber installation requires flexible conduit materials, proper bedding and compaction, and construction timed for moderate soil moisture conditions to minimize shrink–swell effects.
- The soils are cohesive but have very slow internal drainage, leading to persistent surface saturation and ponding after rainfall. Trench excavation in these conditions can result in slumping and soft subgrades. Construction should include dewatering or surface drainage control, watertight conduit systems, and trench plugs to prevent water infiltration and buoyancy in saturated ground.
- Hale County receives more than 55 inches of annual precipitation, with seasonal flooding along the Black Warrior River and its tributaries. These floodplain environments require careful route planning, directional drilling for stream and wetland crossings, erosion- and sediment-control measures, and armored backfill to ensure conduit stability and long-term performance under periodic inundation.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Houston County:
Comcast Cable Communications Management LLC – CM61-BEAD-AL-33

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000327	HFC	2,556	$5,522.31	31

Summary of extenuating circumstances

- This project will connect 1,437 unserved and 1,119 underserved BSLs throughout Houston County, near the city of Dothan, the towns of Ashford, Avon, Columbia, Cowarts, Gordon, Kinsey, Taylor, and Webb, and the unincorporated communities of Alaga, Backems Crossroads, Barber, Crosby, Grangeburg, Hodgesville, Keytons, Love Hill, Lucy, Pansey, Pleasant Plains, Wicksburg, and Wilson Quarters.
- The network deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 60% of the fiber and coaxial cable in this project will be installed underground. Buried infrastructure has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Houston County are widely distributed, with clusters of low linear density in and near the communities listed above, as well as unserved and underserved neighborhoods of Five Points, Memphis, Rambo, Sealy Springs, and Terry Crossroads. The project area spans most of Houston County, resulting in lower overall location density than other projects. Many of the outlying locations sit on large land parcels used for agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Choctawhatchee River and Little Choctawhatchee River and their tributaries.
- Houston County lies in Alabama's southeastern Gulf Coastal Plain, where surface materials consist mainly of loose sands, silts, and clays. These soils are easy to excavate but highly erodible and prone to trench wall collapse in wet conditions. Cable construction requires trench stabilization, proper bedding and compaction, and erosion control to prevent settlement or washouts, especially during heavy rainfall.
- Upland soils are moderately well-drained, while bottomlands near the Choctawhatchee River and its tributaries contain dense, poorly drained clayey soils. Excavation in upland sands requires backfill stabilization to prevent raveling, while work in lowlands demands watertight conduit and dewatering measures to manage saturated soils and shallow groundwater.
- Houston County receives more than 55 inches of annual precipitation, with frequent intense thunderstorms and seasonal flooding in low-lying agricultural areas. These wet conditions increase the risk of trench flooding, erosion, and conduit buoyancy. Underground deployments are typically scheduled during drier months and employ trench plugs, sump-equipped vaults, and directional drilling for stream and wetland crossings to ensure long-term conduit stability.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

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Jefferson County:
Bellsouth Telecommunications, LLC – CM61-BEAD-AL-35

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000394	Fiber	1,542	$6,016.73	0

Summary of extenuating circumstances

- This project will connect 766 unserved and 776 underserved BSLs in Jefferson County, near the cities of Bessemer, Birmingham, Brighton, Center Point, Clay, Fairfield, Fultondale, Homewood, Hoover, Irondale, Kimberly, Mountain Brook, Pleasant Grove, and Vestavia Hills, the towns of Midfield and Morris, and the unincorporated communities of Corner and Forestdale.
- New fiber deployment will follow a combination of state highways and local roads to extend existing infrastructure to connect the eligible locations. Nearly 60% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Jefferson County are distributed county-wide and predominantly are located in uplands surrounding the centers of the communities listed above, in neighborhoods like Bagley, Beltons, Bull City, Bucksville, Cane Creek, Cloester Valley, Hopkins, Linton, Smithson, Summit Farm, Village Springs, and White Oaks. Because the project area spans much of the county, the project has lower overall location density than some other projects, with groups of locations separated by several miles. Many of the outlying locations in the north of the project area sit on large land parcels used for agricultural production, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Black Warrior Rivers and its major tributary the Locust Fork.
- Jefferson County lies within Alabama's Appalachian Ridge and Valley Province and features alternating ridges of sandstone and shale flanked by valleys underlain by limestone and dolostone. Excavation difficulty varies sharply from hard sandstone on ridges that requires mechanical rock trenchers or directional drilling to limestone valleys that are easier to excavate but can contain sinkholes and voids from karst dissolution. Fiber routes must balance these conditions by following existing transportation corridors, avoiding unstable karst areas, and ensuring consistent burial depth across variable terrain.
- The region's soils are red, loamy clays derived from weathered sandstone and shale, with shallow, rocky layers on uplands and poorly drained, silty clays in valleys. These materials can become unstable when saturated and extremely compact when dry, complicating trenching and compaction. Fiber construction requires moisture conditioning, flexible conduit systems, and stable bedding materials to prevent deformation and maintain trench integrity under fluctuating soil moisture.
- Jefferson County receives about 55 inches of annual precipitation, with steep slopes that accelerate surface runoff and erosion. Construction on hillsides and near streams demands robust erosion- and sediment-control measures and watertight conduit systems in low-lying areas to prevent infiltration and conduit exposure. Directional drilling is preferred for stream crossings and steep terrain to protect fiber infrastructure.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Lauderdale County:

Comcast Cable Communications Management LLC – CM61-BEAD-AL-36

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000328	HFC	1,169	$7,403.45	24

Summary of extenuating circumstances

- This project will connect 839 unserved and 330 underserved BSLs in Lauderdale County, near

the city of Florence, the town of Killen, and the unincorporated communities of Center Star, Cloverdale, Green Hill, Kimbroughs Crossroads, Oakland, Rhodesville, and Zip City.

- The network deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 60% of the fiber and coaxial cable in this project will be installed underground. Buried infrastructure has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations are distributed across the central-third of the county, with clusters of low linear density in and near the communities listed above, as well as the unserved and underserved neighborhoods of Blackburn, Central Heights, Hines, Holloway, Jacksonburg, Lock Three, Lock Six, Mansion View, McGee Town, Johnson Crossroads, Sharps Mill, Three Forks, and Wilson. The project area spans a wide portion of Lauderdale County, resulting in lower location density than other projects, with many small groups of locations separated by several miles. Many of the outlying locations to the east and west of the project area sit on large land parcels used for agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Shoal Creek and the Tennessee River and its tributaries.
- Lauderdale County sits at the transition between the Highland Rim and the Tennessee River Valley, featuring rolling uplands underlain by limestone, shale, and dolostone formations. Hard limestone and chert layers make excavation slow and equipment-intensive, while valleys with deeper soils allow easier trenching but may conceal karst features such as sinkholes. Fiber routes must avoid karst-prone zones and use directional drilling or rock trenchers in hard-dig limestone areas to maintain consistent burial depth.
- Much of the county's subsurface is soluble limestone, resulting in irregular ground, sinkholes, and underground drainage systems that complicate trench stability. These conditions increase the risk of conduit settlement, shifting, or collapse over time. Fiber installation requires detailed geotechnical evaluation, flexible conduit design, and stable backfill to minimize stress and ensure long-term durability in variable karst conditions.
- Lauderdale County receives around 55 inches of annual rainfall, with periodic flooding along the Tennessee River and Shoal Creek. Poorly drained valley soils, often silty and plastic, can lead to trench wall collapse and buoyancy issues during wet seasons. Construction is generally limited to drier months, incorporating watertight conduit systems, trench plugs, and erosion- and sediment-control measures to protect infrastructure.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Lawrence County:
Premier Holdings, LLC – CM61-BEAD-AL-37

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000345	Fiber	647	$8,924.12	13

Summary of extenuating circumstances

- This project will connect 626 unserved and 21 underserved BSLs in Lawrence County, near the towns of Courtland and North Courtland and the unincorporated community of Piney Grove.
- New fiber deployment will follow a combination of county and local roads to extend existing infrastructure to connect the eligible locations. Only 14% of the fiber in this project will be installed

underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.

- Eligible locations in Jefferson County are concentrated in north-central and extreme southeast Lawrence County, near Courtland and Piney Grove, respectively. While the north-central project area has attractive linear density, the eligible locations in the southeast are more widely distributed in a region of ridges and valleys, reducing location density and complicating construction. Both regions are crisscrossed by numerous small waterways.
- In the north, the project area lies within the broad floodplain of the Tennessee River, underlain by alluvial deposits and weathered limestone. These fine-grained, cohesive soils are easy to excavate but have poor drainage and high shrink–swell potential, requiring stable bedding, careful compaction, and watertight conduit systems to prevent settlement and infiltration in saturated conditions. Beneath the valley soils, soluble limestone and dolostone can form sinkholes and irregular subgrades, creating localized hard-dig zones and variable trench support. Fiber routes must avoid karst-prone areas where possible, and construction should use reinforced conduit bedding and flexible materials to accommodate potential ground movement or subsidence.
- In the southeast, the project lies within the Highland Rim, where limestone and dolostone are overlain thin, red clay and cherty loam soils. Excavation conditions vary from soft soils in small valleys that are easily trenched to upland ridges with shallow chert or limestone that requires mechanical rock trenchers or directional drilling. Stable bedding and flexible conduit materials are needed to prevent abrasion and maintain proper burial depth in rocky ground.
- Lawrence County receives about 55 inches of annual precipitation. In the north, poorly drained soils and floodplains along the Tennessee River and its tributaries are prone to waterlogging and trench collapse during wet seasons. Construction is generally scheduled for drier months, using watertight conduit systems, trench plugs, and erosion-control measures to protect
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Lee County:
Bellsouth Telecommunications, LLC – CM61-BEAD-AL-38

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000389	Fiber	1,132	$8,778.19	0

Summary of extenuating circumstances

- This project will connect 939 unserved and 193 underserved BSLs in Lee County, near the cities of Auburn and Smiths Station, the towns of Loachapoka and Marvyn, and the unincorporated communities of Beauregard, Beehive, Hopewell, Mechanicsville, and Salem.
- The network deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. More than 70% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Lee County can be found in small clusters near the communities listed above, as well as the neighborhoods of Beans Mill, Dupree, Farmville, Griffen Mill, Halawaka, Mitchell Crossroads, Moffits Mill, Mount Jefferson, Parkers Crossroads, Pine Grove, Powledge, Ridge Grove,

Sand Hill, Shotwell, and Wright Crossroad. However, those clusters are widely distributed and generally separated by several miles. Many of the outlying locations sit on large land parcels used for agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Chattahoochee River to the east, and Tallapoosa River, further west.

- Lee County sits along Alabama's Fall Line, where hard metamorphic rocks of the Piedmont meet soft sands and clays of the Coastal Plain. Excavation conditions change quickly from bedrock and thin soils in upland areas that require mechanical rock trenchers or directional drilling to lowland sands and clays are easy to trench but need stabilization and compaction to prevent settlement.
- The upland soils are red, well-drained clays derived from weathered crystalline rock that expand when wet and contract when dry. These seasonal volume changes can shift or crack buried conduit. Fiber construction must include flexible conduit systems, proper bedding, and backfill compaction timed for moderate moisture conditions to reduce soil movement effects.
- Lee County receives about 55 inches of rainfall annually, with numerous small streams and valleys draining toward the Chattahoochee River basin. Heavy rain events cause rapid surface runoff, leading to trench wall collapse and sediment movement in disturbed soils. Construction should include erosion- and sediment-control measures and use watertight conduit in flood-prone or low-lying areas to prevent infiltration and long-term damage.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Lowndes County:
Ardmore Telephone Co. Inc. – CM61-BEAD-AL-39

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000481	Fiber	251	$10,500.00	0

Summary of extenuating circumstances
As a result of ADECA's negotiations, this award is now at $10,500 per location. ADECA seeks guidance on any further actions required. We believe the following price justification is reasonable for keeping the project as it is.

- This project will connect 249 unserved and 2 underserved BSLs in Lowndes County, near the towns of Farmersville and Fort Deposit, and the unincorporated community of Braggs.
- New fiber deployment will follow a combination of state and local roads to extend existing infrastructure to connect the eligible locations. All the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Lowndes County are concentrated in the southwestern quarter of the County, with clusters of low linear density in and near the communities listed above, as well as the unserved and underserved neighborhoods of Clover Hill, Fostoria, Palmyra, and Pleasant Hill. Eligible locations are widely distributed across this region of ridges and valleys, reducing location density. Many of the outlying locations sit on large land parcels used for agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Alabama, Cahaba, Coosa, and Sepulga rivers.
- Lowndes County lies within Alabama's Coastal Plain "Black Belt," where sedimentary rocks

weather into highly plastic clays. These soils expand when wet and shrink when dry, leading to trench distortion, settlement, and conduit misalignment. Fiber installation requires flexible conduit, firm bedding, and properly timed compaction during moderate moisture conditions to reduce shrink–swell impacts.

- The derived soils have very low permeability, causing persistent surface saturation and ponding after rainfall. These conditions make trench walls prone to slumping and soft subgrades difficult to compact. Construction should incorporate watertight conduit systems, trench plugs, and effective drainage design to prevent infiltration and buoyancy in saturated ground.
- The county receives about 55 to 60 inches of precipitation annually, with seasonal flooding along the Alabama River and its tributaries. Floodplain areas feature poorly drained silty and clayey soils that increase erosion and trench instability risks. Construction in these zones should favor directional drilling for river and wetland crossings, along with erosion- and sediment-control measures to ensure long-term conduit protection.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA. The following justification was submitted by the CTO of Ardmore Telephone Company:

The justification for our costs in our application is primarily because we are planning to build a buried fiber optic network in rural Alabama. While building a buried plant is more expensive, we have found that it is a much more reliable and resilient network. Specific evidence of this is when an EF4 ripped through our service territory on December 10, 2021, causing tremendous damage to all aerial utilities, but fortunately for our buried utilities we suffered minimal damage.

Our budget costs are based on anticipated material prices as well as recent bids from similarly scoped projects. As we draw closer to actual BEAD contracts material availability will significantly shrink causing a sharp rise in material prices. The same can be said with labor.

All locations in our application are in rural Alabama. We will need to build several miles just to reach small clusters of homes. This low density of homes in our application is one of the key factors that drives our cost per location.
Darren Duke
Chief Technology Officer

Macon County:
Windstream Alabama, LLC – CM61-BEAD-AL-40

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000312	Fiber	531	$6,990.44	0

Summary of extenuating circumstances

- This project will connect 501 unserved and 30 underserved BSLs in Macon County, near the town of Franklin, and the unincorporated communities of Hardaway, Millstead, Little Texas, and Society Hill.
- The network deployment will follow a combination of federal and state highways and local roads to extend existing infrastructure to connect the eligible locations. All the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Bibb County can be found in small clusters near the communities listed above, as well as the neighborhoods of Alliance, Cotton Valley, Davisville, Goodwyn, La Place, Mount Andrew, and Tysonville. However, those clusters are widely distributed and generally separated by

several miles. Many of the outlying locations sit on large land parcels used for agriculture, further lowering location density. Other locations are on ridges and valleys, with limited routing options and low density. Finally, the region is crisscrossed with small waterways that drain into the Talapoosa River and its tributaries.

- Macon County lies within Alabama's East Gulf Coastal Plain, where surface materials consist of sandy, silty, and clayey deposits. These sediments are easy to excavate but lack cohesion, leading to trench wall collapse and settlement in wet conditions. Fiber installation requires trench stabilization, proper bedding, and firm compaction to maintain conduit alignment and prevent deformation in soft soils.
- Upland soils are red and yellow clays that expand when wet and contract when dry, while bottomlands contain loose sandy and silty alluvium that erodes easily. Construction methods must adapt—using moisture control and strong compaction in clay-rich uplands and erosion control and trench reinforcement in sandy lowlands—to ensure long-term stability and prevent washouts.
- Macon County receives more than 55 inches of rainfall annually, with low-lying areas along Cubahatchee Creek and Uphapee Creek frequently experiencing ponding and shallow groundwater. These conditions can cause trench flooding and buoyancy in conduit systems. Construction is typically restricted to drier months, incorporating watertight conduit, trench plugs, and erosion- and sediment-control measures to ensure system integrity.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Marengo County:
MStreet Fiber Alabama, LLC – CM61-BEAD-AL-41

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000295	Fiber	408	$8,734.64	22

Summary of extenuating circumstances

- This project will connect 335 unserved and 73 underserved BSLs in Marengo County, near the cities of Demopolis and Linden, the towns of Faunsdale and Providence, and the unincorporated communities of Alfalfa, Half Chance, Moscow, Old Spring Hill, and Salt Well.
- New fiber deployment will follow a combination of state and federal highways and local roads to extend existing infrastructure to connect the eligible locations. Only 2% of the fiber in this project will be installed underground. Unfortunately, many regions of Alabama feature aging aerial infrastructure, such as short or crowded utility poles, long pole spans, or poles with deferred maintenance needs. Make-ready costs are higher in these areas, increasing the cost of aerial deployment.
- Eligible locations in Marengo County are concentrated in the central and northers portions of the county, with clusters of low linear density in and near the communities listed above, as well as the unserved and underserved neighborhood of Knoxwood. Eligible locations are widely distributed across this region of ridges and valleys, reducing location density. Outlying locations sit on large land parcels used for agriculture, further lowering location density. Finally, the region is crisscrossed with small waterways that drain into the Tombigbee River and its tributaries.
- Marengo County lies within Alabama's Coastal Plain "Black Belt," where chalks and marls weather into highly plastic clay soils. These clays expand when wet and shrink when dry, causing trench deformation, settlement, and conduit misalignment. Fiber construction requires flexible conduit systems, proper bedding, and backfill compaction during moderate moisture conditions to minimize soil movement and maintain trench integrity.

- The chalk and marl beneath the clay-rich soils have very low permeability, resulting in persistent surface saturation and ponding after heavy rainfall. These wet, cohesive soils can slump during excavation, and standing water can increase buoyancy risks for buried conduit. Construction should include watertight conduit, trench plugs, and surface drainage management to prevent infiltration and long-term structural instability.
- Marengo County receives approximately 55 to 60 inches of annual precipitation, with frequent flooding along the Tombigbee and Black Warrior Rivers and their tributaries. These areas feature soft, silty alluvium and shallow groundwater that complicate trenching. Fiber installation should use directional drilling for stream and wetland crossings and incorporate erosion- and sediment-control measures to ensure durability.
- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

Marshall County:
Farmers Telecommunications Corporation – CM61-BEAD-AL-42

Application ID	Tech	BSLs	Cost /BSL	CAIs
App-000264	Fiber	870	$6,529.62	1

Summary of extenuating circumstances

- This project will connect 722 unserved and 148 underserved BSLs in Marshall County, near the city of Boaz, town of Meltonsville, and the unincorporated communities of Asbury, Horton, Hustleville, Mount Hebron, Red Hill, and Warrenton.
- New fiber deployment will follow a combination of state highways and local roads to extend existing infrastructure to connect the eligible locations. Approximately 70% of the fiber in this project will be installed underground. Buried fiber has higher deployment costs than aerial installation. However, this approach offers greater reliability, resiliency, and longevity, and lower long-term maintenance costs than aerial deployments, because infrastructure is protected from wind, ice, and storm damage, as well as accidental contact from vehicles or vegetation.
- Eligible locations in Marshall County are widely distributed throughout the county, with clusters of low linear density in and near the communities listed above, as well as the unserved and underserved neighborhoods of Alder Springs, Five Points, Kirbytown, Manchester, and Poplar Springs. Eligible locations are generally found in ridges and valleys with limited access, reducing location density. Outlying locations, particularly on the County's eastern and western borders, sit on large land parcels used for agriculture, further lowering location density. Finally, the project area is crisscrossed with small waterways that drain into Guntersville Lake and the Tennessee River and its tributaries.
- Marshall County lies along the southern Cumberland Plateau and Tennessee River Valley, featuring flat uplands underlain by hard sandstone and shale and deep valleys filled with softer alluvium. Excavation in upland areas is slow and equipment-intensive, requiring rock trenchers or directional drilling, while valley soils are easier to dig but can settle if not compacted properly. Fiber routes must be carefully aligned to balance constructability, slope stability, and access constraints across steep terrain.
- The lower elevations near the Tennessee River are underlain by limestone and dolostone that have developed karst features such as sinkholes, cavities, and irregular drainage. These conditions increase the risk of trench instability or conduit settlement over time. Fiber installation should include route planning to avoid active karst zones, flexible conduit systems, and stable backfill to maintain long-term integrity in variable subsurface conditions.
- The county receives more than 55 inches of annual precipitation, with frequent heavy storms

producing runoff and slope erosion. Open trenching on ridges and slopes requires erosion- and sediment-control measures and watertight conduit systems in flood-prone areas to prevent infiltration, buoyancy, and conduit exposure during wet seasons.

- The combination of ground conditions, waterways, and location distribution result in higher total deployment costs than other projects awarded by ADECA.

ADECA believes that the proposed Priority broadband project offers several advantages that will address the specific broadband needs of this region, and the proposed deployment can support the deployment of 5G, successor wireless technologies, and other advanced services, aligning with the goals of the BEAD Program and the BEAD RPN.

As of the submission of this Final Proposal, ADECA has identified approximately $880,998,750.07 in remaining BEAD funds to be allocated to eligible non-deployment activities under Section IV.B.7.a.iii of the NOFO. Per Section 5 of the Restructuring Policy Notice, ADECA understands that BEAD funding for non-deployment activities is subject to future NTIA and NIST Grants Office guidance.

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.

ADECA took the steps outlined in its approved Initial Proposal Volume II as modified by the BEAD Restructuring Policy Notice to ensure a fair, open, and competitive subgrantee selection process. All elements of the state's BEAD program were designed with these goals at the forefront, including efforts to ensure the training, qualifications, and objectiveness of reviewers.

In addition to the approach described in the Initial Proposal Volume II, the following sections describe specific ways in which ADECA ensured fairness, openness, and competition in the subgrantee selection process in alignment with the Policy Notice.

Conducting open outreach and communications to all potential applicants

As a foundation of ADECA's open, fair, and competitive process, ADECA made all program information available publicly to all interested parties.

ADECA published all BEAD Program materials to its public website: https://adeca.alabama.gov/bead-eligible-broadband-serviceable-locations-and-subgrantee-selection-process/, ensuring all prospective applicants and other interested parties had equal access to applications, templates, applicant guides, location data, FAQs, and all other program details. This posting included ADECA's revised scoring rubric in alignment with the Policy Notice to ensure the criteria were publicly available to all applicants in advance of the Benefit of the Bargain Round application window.

In addition, ADECA hosted a webinar on June 20, 2025, discussing the prequalification process and a webinar on June 30, 2025, discussing specifics of the Benefit of the Bargain Round application. ADECA also held virtual office hours during the Benefit of the Bargain Round application window on July 9, 2025, and July 14, 2025. ADECA accepted questions from webinar and office hour participants and via email, but answered all questions publicly in an FAQ posting that was regularly revised to reflect new questions and answers. This approach ensured that all applicants had access to the same information.

As described below, ADECA conducted a Benefit of the Bargain Round. ADECA notified prospective applicants of the Benefit of the Bargain Round on June 18, 2025, and June 30, 2025, via blast emails that promoted a webinar to discuss the new subgrantee selection process and informed prequalified applicants about the timing of the Benefit of the Bargain Round, respectively.

ADECA opened the prequalification application window from June 20, 2025, to June 30, 2025, and opened the Benefit of the Bargain Round project application window from July 1, 2025, to July 15, 2025, giving all applicants the same amount of time to apply.

Applying a technology-neutral definition of Priority Broadband Projects

As described in detail in Requirement 12 of this Final Proposal, the state applied a technology-neutral definition of Priority Broadband Projects as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice. This approach promoted fair competition for all applicants regardless of technology.

Optimizing BEAD locations for fairness for unlicensed fixed wireless providers

To support a fair, open, and competitive process in terms of a technology-neutral approach, ADECA took steps to account for BSLs with access to existing unlicensed fixed wireless (ULFW) service, in alignment with the BEAD Restructuring Policy Notice.

ADECA posted a public notice on June 12, 2025, directed to ULFW providers that reported service to BEAD-eligible locations in the state in the FCC's Broadband Data Collection system with technology code 70. The notice alerted the ULFW providers that, if they believed the performance of their ULFW service meets the technical specifications for BEAD performance as documented in the Policy Notice (Appendix A), then they had seven calendar days from the public posting date to alert ADECA if they intended to submit evidence that BEAD funding is not required for the locations they serve.

In response to ULFW providers that submitted a notice of intent within seven calendar days, ADECA sent an evidence template that the ULFW provider then had seven calendar days to complete and submit to ADECA for review. The evidence request was based on guidelines in Appendix A of the Policy Notice.

ADECA did not receive submissions of evidence from any unlicensed fixed wireless providers.

Reopening the prequalification application

In alignment with the Policy Notice, and to promote a fair, open, and competitive subgrantee selection process, ADECA reopened its prequalification process prior to the Benefit of the Bargain Round. Previously prequalified applicants were not required to reapply; any responses they had previously submitted to questions that were eliminated by the Policy Notice were disregarded by ADECA. New applicants were held to the same fair standards for demonstrating they meet the financial, managerial, technical, and operational capabilities.

Conducting a Benefit of the Bargain Round to promote fairness and competition

To support a fair, open, and competitive subgrantee selection process, ADECA conducted a Benefit of the Bargain Round that enabled all applicants, regardless of technology or prior participation in the BEAD Program, to compete in compliance with the terms of the Policy Notice. That Round is described in Requirement 1.1 of this Final Proposal.

Ensuring the training, qualifications, and objectiveness of reviewers

Unbiased, informed review of each application is critical to a fair, open, and competitive grantmaking process. ADECA ensured the training, qualifications, and objectiveness of reviewers for its BEAD program, including for the prequalification application process and the subgrantee selection (project application) process. This approach, in turn, ensured that ADECA implemented a fair, impartial review process that was based on data and quantitative measures as a safeguard against bias.

No conflict of interest

ADECA established an impartial review process that is free from conflicts of interest, with independent evaluators engaged to assess proposals, consistent with best practices for evaluating and awarding grants. To insure against risks of bias, collusion, conflicts of interest, and self-dealing, ADECA required all reviewers to be financially independent of all applicants.

Trained, qualified, objective reviewers

ADECA engaged independent reviewers who were trained in the requirements of the BEAD Program, including the NOFO, the state's Initial Proposals, and the Policy Notice. Reviewers evaluated all applications according to standard operating procedures (SOP) and consistent review criteria.

All application reviewers for the Benefit of the Bargain Round were trained in the rules and requirements of the subgrantee selection process. Trained reviewers evaluated applications for completeness and sufficiency, and individual components of the application were assigned for review by

relevant subject matter experts (SME):

- Telecommunications technology experts reviewed responses to questions related to technical design for technical feasibility and for Priority/Non-Priority determinations. The reviewers followed standard operating procedures and used checklists of review criteria to ensure they followed the same objective review standards for each application.
- Financial experts reviewed responses to questions related to the applicant's financial capability and project-specific financial documentation, following a standard operating procedure for financial reviews.
- Analytics experts evaluated responses to scored questions according to ADECA's Benefit of the Bargain Round scoring rubric. Reviewers conducted a manual quality control (QC) check of score outputs against the applicant's responses in the application.

To facilitate ADECA's oversight, all review findings were presented to ADECA for confirmation and final determination on subgrant awards.

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.

Not applicable. ADECA received applications for all project areas.

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.

To revise its approved post-Challenge Process list of CAIs, ADECA removed or reclassified CAIs where appropriate according to the definition established by IIJA (47 U.S.C. §1702(a)(2)(E)) and adopted by the Policy Notice. Entities that fall outside the statutory definition were removed. Entities classified as community support organizations that no longer qualify based on NTIA guidance issued in July 2025 (Final Proposal Guidance, version 2.1; BEAD FAQs, Version 12) were removed.

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

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 state applied the definition of Priority Broadband Project as defined in the BEAD Restructuring Policy Notice (Policy Notice) and the Infrastructure Investment and Jobs Act (Infrastructure Act or IIJA), meaning that a Priority Broadband Project must demonstrate the network will achieve:

- Speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads (100/20 Mbps)
- Latency less than or equal to 100 milliseconds
- Easy scalability to support advanced wireless services and future applications

The state took a technology-neutral approach to its analysis. Each applicant was allowed to request that their project be considered a Priority project. To determine which applications meet the requirements for

Priority Broadband Projects (as defined in the Infrastructure Act and the Policy Notice), ADECA contracted an experienced broadband engineering team to develop technical evidence templates for the Benefit of the Bargain Round project application and then to objectively review the applications received.

The following sections describe the way in which ADECA applied the definition of Priority Broadband Projects in an objective, technology-neutral manner.

Framework for the state's technical review of Benefit of the Bargain Round applications

The state undertook an analysis designed to align with the requirements of NTIA's Policy Notice. Per those requirements, that analysis determined:

1. First, whether the applicant complied with the data submission requirements of the Policy Notice, which provides that "[a]pplicants must provide supporting documentation sufficient for the Eligible Entity to assess the network application and determine that the proposed network architecture for each specific project area meets this standard" (Policy Notice, p. 9).
2. Second, if the applicant did provide sufficient data to enable the appropriate analysis, whether the proposed project meets the Policy Notice's requirements for a Priority Broadband Project, which is defined as "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 can easily scale speeds 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" (Policy Notice, p. 9).

Methodology

To make these determinations (i.e., to apply the definition of Priority Broadband Projects), the state developed a methodology for engineering review that was designed to align with the Infrastructure Act, NTIA's Policy Notice, and NTIA's BEAD Frequently Asked Questions and Answers (FAQ). The FAQ Version 12 requires that states "establish a review methodology that addresses each component of the statutory definition of a Priority Broadband Project and that can be fairly applied to assess all proposed projects that request Priority Broadband Project Status." (FAQ 3.23, pp. 42-43).

The methodology was designed to ensure a project-by-project, area-by-area determination that enables every applicant to demonstrate that its proposed project meets the Priority requirements for the specific geographic area for which that project is proposed, as directed by the FAQ, which states that "an Eligible Entity may determine that an applicant with several project proposals across the state may not merit Priority Broadband Project status for all proposals if a proposed technical capability showing is not sufficiently tailored to a given project area" (FAQ 3.23, p. 43).

The following is a brief summary of the methodology used by the state to evaluate the applications to determine whether the proposed projects meet the requirements to be considered Priority Broadband Projects.

The methodology enabled fair consideration of all applications, regardless of the technology type proposed, to allow for an informed, data-driven determination of whether a given project is capable of meeting the Priority Broadband Project definition.

Data evaluated

The engineering review was based on data provided in each Benefit of the Bargain Round project application. The data were requested in the application according to technology, with data requests designed to elicit the appropriate information for the state to fulfill the NTIA mandate to analyze whether the applicant's proposed project met the requirements of the BEAD definition of "Priority Broadband Service" in the specific area proposed in that application.

While the assessment was technology-neutral, the state's requests for data were adapted to the specific technologies proposed by each applicant to ensure that, to the extent that applicants provided sufficient documentation, the reviewers had access to the relevant and appropriate data to enable an informed, data-driven determination of Priority status.

This approach was modeled on NTIA's guidelines in the Policy Notice for unlicensed fixed wireless (Policy Notice, Appendix A) and LEO satellite broadband services (Policy Notice, Appendix B); those guidelines addressed the unique challenges of evaluating specific technologies while maintaining technology-neutral functional standards.

The state's data requests were designed to elicit the appropriate information from the applicants for the following technology types:

1. Fiber
2. Hybrid fiber-coaxial (cable)
3. Licensed fixed wireless
4. Unlicensed fixed wireless
5. Low-Earth orbit (LEO) satellite

Applicants proposing a project with more than one technology (such as a hybrid fiber/fixed wireless project) were requested to provide data in both categories for the relevant BSLs.

The data requests were also designed to place the least burdensome possible requirements on the applicants while still eliciting sufficient information for the state's Priority analysis to be performed in an informed and data-driven manner. For example, spreadsheet templates requesting data at the BSL level were designed to enable applicants to easily transfer data derived from the network modeling software that is used in the broadband industry to develop conceptual-level designs and that is used to develop designs appropriate for a grant application.

Analyses conducted

The following are the specific analyses conducted for each proposed project, by technology type:

Fiber

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide "supporting documentation sufficient for [the state] to assess the network application." In the event the applicant's data submission was determined to be sufficient for this purpose, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Assess the proposed technology type (i.e., end-to-end fiber project)
- Review the applicant's data to assess the capacity in the proposed access and distribution network
- Review the applicant's data to assess the proposed backhaul capacity
- Review the applicant's data to assess the proposed latency
- Review the applicant's data to assess whether the network is easily scalable to support evolving connectivity needs

Proposed fiber projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

Hybrid fiber-coaxial

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide "supporting documentation sufficient for [the state] to assess the network application." In the event the applicant's data submission was determined to be sufficient, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Assess the proposed technology type (i.e., DOCSIS version)
- Review the applicant's data to assess the capacity in the proposed access and distribution network
- Review the applicant's data to assess the proposed backhaul capacity
- Review the applicant's data to assess the proposed latency
- Review the applicant's data to assess whether the network is easily scalable to support evolving connectivity needs

Proposed hybrid fiber-coaxial projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

Licensed fixed wireless

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide "supporting documentation sufficient for [the state] to assess the network application." In the event the applicant's data submission was determined to be sufficient, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Review the information submitted by the applicant on spectrum use, network equipment, tower details, sector antenna details, antenna and radio specifications, customer premises equipment (CPE) specifications, signal strength at each proposed BSL, upstream and downstream speed at each BSL, and backhaul
- Review data from the applicant-submitted planning model and compare that model to theoretical maximums (e.g., free-space path loss)
- Review the applicant-submitted planning model to assess whether it adequately accounts for the effects of natural and physical features of the project area, such as terrain and foliage
- Review the applicant's data on the capacity to serve the proposed BSLs in the project area considering the BSLs' locations and physical clustering
- Review the applicant's data to assess the ability of the applicant's network to meet Priority throughput criteria for all BSLs in the proposed project area
- Review the applicant's data to assess the ability of the applicant's network to easily scale to support evolving connectivity needs
- Review the applicant's data to assess the ability of the applicant's network to support 5G and advanced services

Proposed licensed fixed wireless projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

Low-Earth orbit (LEO) satellite

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide "supporting documentation sufficient for [the state] to assess the network application." In the event the applicant's data submission was determined to be sufficient, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Review the information submitted by the applicant on spectrum use, satellites, service area, Earth stations, and CPE specifications
- Review the applicant's depiction of its beam area superimposed on the proposed project area to assess the available capacity for the proposed project area
- Review the applicant's area-specific assessment of capacity, including for proposed BSLs and other users
- Review the applicant's data and narrative describing backhaul capacity
- Review the applicant's data and narrative describing sky view, the impact of obstructions such as foliage, and the applicant's strategy for managing the challenges
- Review the applicant's data and narrative describing the number of available satellites per user and the effect of handoffs on performance
- Review the applicant's data and narrative describing latency, jitter, and packet loss under regular conditions and handoff
- Review the applicant's area-specific assessment of its network's capacity to support evolving connectivity needs

Proposed LEO projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

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.

ADECA scored each application in alignment with the BEAD Restructuring Policy Notice (Policy Notice).

As described in Requirement 12 in this Final Proposal, ADECA determined whether an application met the technical requirements for a Priority Broadband Project as defined in the Policy Notice. ADECA conducted further analysis of project overlaps and coverage percentages to identify all proposed projects in the same general area. ADECA then applied the Policy Notice's scoring rubric.

ADECA applied a primary scoring criterion of minimal BEAD Program outlay for applications proposing to serve the same general project area. ADECA prioritized Priority Broadband Projects over non-Priority Broadband Projects.

If there was no competition in the same general area, projects were assigned if ADECA's BEAD budget allowed and costs were not excessive following a request for Best and Final Offers. Where costs did appear excessive, ADECA engaged in targeted negotiations to encourage applicants to reduce their per location average costs.

As a result of this effort to achieve the benefit of the bargain in its BEAD program, ADECA was able to negotiate all applications but one to below an excessive cost threshold of $13,000 average per location.

ADECA evaluated applications based on secondary scoring criteria in cases where "an application to serve the same general project area propose[d] a project cost within 15% of the lowest-cost proposal received for that same general project area on a per BSL basis" (per the Policy Notice, p. 12). In alignment with the Policy Notice, those secondary criteria were:

- Speed to deployment
- Speed of network and other technical capabilities

The third criterion identified in the Policy Notice, "preliminary/provisional subgrantees," was not applicable because ADECA had not previously identified any such subgrantees.

The secondary scoring rubric applied with the following points:

- Speed to Deployment: 10 points maximum (if project complete within 36 months of award)
- Speed of Network: 90 points maximum, as follows:

Download	Upload	Points
≥2 Gbps	≥2 Gbps	90
≥ 1 Gbps and < 2 Gbps	≥ 1 Gbps and < 2 Gbps	75
≥ 500 Mbps and < 1 Gbps	≥ 500 Mbps and < 1 Gbps	50
≥ 100 Mbps and < 500 Mbps	≥ 100 Mbps and < 500 Mbps	25
≥ 100 Mbps	< 100 Mbps	0

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.

The state publicly posted a link to the approved post-Challenge Process location classifications (unserved, underserved, and CAI) reconciled per the BEAD Restructuring Policy Notice for the Benefit of the Bargain Round:
https://adeca.alabama.gov/bead-eligible-broadband-serviceable-locations-and-subgrantee-selection-process/
Date publicly posted: June 30, 2025

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.

N/A

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.

N/A

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

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?

Yes

4.2.1 Oversight and Accountability - BEAD Program Monitoring Plan

(1) BEAD program monitoring plan;

BEAD Program Monitoring Plan 4.2(1)-09-30-2025 04-51-ECONOMIC AND COMMUNITY AFFAIRS, ALABAMA -GRN-000093.pdf

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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.

Draft-BEAD-Subaward-Agreement-09-30-2025 04-55-ECONOMIC AND COMMUNITY AFFAIRS, ALABAMA -GRN-000093.pdf

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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

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.

In Progress.

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

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.

ADECA affirms that it has taken measures to ensure these outcomes. As described further in NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1 | July 2025)," ADECA has taken steps to:

- Ensure that each BEAD subgrantee will begin to provide services to customers that desire broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant
- Ensure that all BEAD-funded subgrant activities are completed at least 120 days prior to the end of ADECA's period of performance
- Ensure each subgrantee reaches key milestones in their submitted proposals/documentation. In doing so, ADECA affirms that it will ensure subgrantees that made specific commitments in response to the "speed to deployment" scoring criteria meet the timelines stated in their applications
- Ensure the completion of all BEAD activities within the mandated timeframes

In its outreach to prospective applicants, the state communicated the requirement for subgrantees to complete their project and begin providing service within the four-year timeline specified by the

program. This outreach included webinars, FAQs, application guides, and information posted on ADECA's BEAD program website.
The state's BEAD project application required the applicant to provide a detailed timeline for the proposed project and a specific commitment regarding speed to deployment.
The terms and conditions of the state's BEAD subgrant agreement will include clear provisions for subgrantees to complete their project within the term of the award. As part of the state's post-award compliance process (described in Requirement 4 of this Final Proposal), the state will monitor subgrantees for compliance. Subgrantees must regularly report to ADECA on their progress to project completion.
All subgrants will end at least 120 days prior to the end of the period of performance for ADECA's BEAD grant award, allowing the state sufficient time to close out subgrants and complete the grant activities it has undertaken.

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 state met the local coordination requirements:
a. The state facilitated a public comment period of 7 days. The state posted its draft Final Proposal and related data to its public website https://adeca.alabama.gov/bead-eligible-broadband-serviceable-locations-and-subgrantee-selection-process/ on September 9, 2025. The state alerted potential commenters through its standard approaches to public notices. The public comment period remained open for 7 days, until September 16, 2025.
b. Political subdivisions and all other interested parties were eligible to submit comments to the state during the comment period.
The state evaluated all comments received during the public comment period, as well as comments received on September 17 following the deadline. The following is a high-level summary of the comments received:
· ISPs submitted feedback on award decisions and questions about the post-award process
· A nonprofit recommended use of remaining BEAD funds for non-deployment activities
· ISPs questioned BEAD funding for locations that they claimed are already served
ADECA received comments from ISPs (including a utility that indicated it is a public entity), a nonprofit, and a foundation. At a high level, these comments represent significant public engagement in ADECA's BEAD planning efforts and confirmed the general direction of ADECA's Final Proposal.
ISPs submitted questions and comments about the process for selecting subgrantees and about award decisions made for their applications. Some also submitted feedback on awarded locations questioning the need for BEAD funding due to private investments made by their companies. ADECA replied to all questions related to funding locations by advising that NTIA requires that ADECA gather all evidence submitted and provide that to NTIA along with recommendations for locations to be removed from the BSL list for locations eligible for funding via the Reason Code process.
Two applicants provided clarifying or previously unsupplied evidence to support their claims for self-funding of locations. This evidence was submitted after the application period, but ADECA felt it important to accept the data for consideration. ADECA is researching the data and will submit the data to NTIA for review. The data being submitted with this Final Proposal includes the reduced locations for Baldwinn and Lee counties. We have received a revised proposal for the Lee County application, and it is included in the submission totals. We have reached out to the presumed awardee for Baldwin County but have not received their revised proposal for the reduced project locations. Due to the size of the reduction, ADECA anticipates a significant change in the proposal. If the proposal is withdrawn, if the proposal is for less than 100% of the remaining location, and/or if the cost per location is higher than the proposal submitted by other applicants, ADECA will seek guidance from NTIA on awarding to the next

applicant on the list for Baldwin County. A similar technique will be used if an applicant does not execute a subaward for any reason, including but not limited to, inability to secure performance bond or Letter of Credit, change of circumstances since application was submitted, or other reasons leading to the withdrawal of the application.
ADECA has reviewed all location evidence submitted during the public comment period to determine updates that may be required for the preliminary awards based on the evidence submitted. ADECA has completed the updates for BSLs that are eligible for funding, as appropriate, and has contacted each affected preliminary awardee to review any changes required. The necessary revisions to the BEAD eligible locations are included in this Final Proposal. The Deployment CSV and the e.2. tab of the FPFR will be updated as confirmations of acceptance are received from each of the affected preliminary awardees. ADECA's FPO advised that the Final Proposal be submitted with this current status to avoid further delay, and to make updates to the Deployment CSV and the FPFR subgrantee projects list as needed during ADECA's first round of curing responses. Completion, to include confirmation from the preliminary awardees on their final acceptance of the location updates, is currently underway.
In addition, ISPs requested clarification on the next steps following preliminary awards, including questions about communications with preliminary awardees and comments on the draft subgrant agreement posted by ADECA with the Final Proposal. ADECA responded that updates would be made to all participants after NTIA approval was received.
A national nonprofit commended Section 1.1 of ADECA's Final Proposal for identifying remaining BEAD funds to be allocated to eligible non-deployment activities under Section IV.B.7.a.iii of the NOFO, pending guidance by NTIA and NIST. ADECA responded that non-deployment activities were pending NTIA approval for consideration.
ADECA responded via email to all the comments it received.
ADECA appreciates the time, effort, and engagement of all the public commenters. This Final Proposal reflects the input ADECA received. Some commenters suggested changes that cannot be incorporated into this Final Proposal because the suggestions run contrary to NTIA's guidance and the BEAD Program

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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.

Environmental and Historic Preservation Docum-09-30-2025 05-00-ECONOMIC AND COMMUNITY AFFAIRS, ALABAMA -GRN-000093.pdf

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.

Curing4 Tribal Lands 20251024-10-24-2025 05-24-ECONOMIC AND COMMUNITY AFFAIRS, ALABAMA -GRN-000093.docx

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.'

ADECA was granted two brief extensions by NTIA for preparation of the public comment draft of the Final Proposal and the Final Proposal submission.

Final Proposal Funding Request Amount
Enter the amount of the Final Proposal Funding Request.

1396221901.77

Project Narrative
Submit the Eligible Entity's project narrative.

Curing13 FPFR Budget Narrative-01-26-2026 04-21-ECONOMIC AND COMMUNITY AFFAIRS, ALABAMA -GRN-000093.docx

Consolidated Budget Form
Submit the Eligible Entity's consolidated budget form.

Curing13 FPFR 20260126-01-26-2026 04-21-ECONOMIC AND COMMUNITY AFFAIRS, ALABAMA -GRN-000093.xlsx