Broadband Equity, Access, and Deployment (BEAD) Program

Final Proposal

DRAFT | September 2025

In compliance with the BEAD NOFO, as modified by NTIA's BEAD Restructuring Policy Notice

Contents

0. Final Proposal Data Submission

0.1 Attachment (Required): Complete and submit the Subgrantees CSV file (named "fp_subgrantees.csv") using the NTIA template provided.

See attachment.

0.2 Attachment (Required): Complete and submit the Deployment Projects CSV file (named "fp_deployment_projects.csv") using the NTIA template provided.

See attachment.

0.3 Attachment (Required): Complete and submit the Locations CSV file (named "fp_locations.csv") using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See attachment.

0.4 Attachment (Required): Complete and submit the No BEAD Locations CSV file (named *"fp_no_BEAD_locations.csv"*) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See attachment.

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

Y

0.6 Attachment (Required – Conditional on a 'Yes' Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named "*fp_cai.csv*") using the NTIA template provided.

Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity's compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity's Challenge Process results.

See attachment.

1. Subgrantee Selection Process Outcomes (Requirement 1)

Relevant Instructions from the Infrastructure Act, 47 U.S.C. § 1702 (e)(4)(A)(i)(I):

the eligible entity may submit a final proposal for the remainder of the amount allocated to the eligible entity ... that includes-

(I) a detailed plan that specifies how the eligible entity will-

(aa) allocate grant funds for the deployment of broadband networks to unserved locations and underserved locations, in accordance with subsection (h)(1)(A)(i); and

(bb) align the grant funds allocated to the eligible entity under subsection (c), where practicable, with the use of other funds that the eligible entity receives from the Federal Government, a State, or a private entity for related purposes

Relevant Instructions from BEAD Restructuring Policy Notice Section 3.3, Pages 10 -11:

... NTIA is requiring Eligible Entities to conduct at least one additional subgrantee selection round for every BEAD-eligible location (the "Benefit of the Bargain Round"). The Benefit of the Bargain Round must permit all applicants - regardless of technology employed or prior participation in the program - to compete on a level playing field undistorted by the non-statutory regulatory burdens eliminated above. All subgrantee selection conducted after the release of this Policy Notice must comply with the terms of this Policy Notice.

Eligible Entities must rescind all preliminary and provisional subaward selections and notify applicants that a further round of applications will be considered before final awards are made. Eligible Entities that have already completed subgrantee selection must conduct at least one Benefit of the Bargain round. Eligible Entities have 90 days to comply with the obligations outlined within this Policy Notice and submit a Final Proposal that reflects the results of the Benefit of the Bargain round. This deadline replaces the deadline extensions previously granted in the Programmatic Waiver of the Final Proposal Deadline Requirements. NTIA will complete its review of each Final Proposal within 90 days of submission.

To the extent an Eligible Entity has a prequalification process, it must be reopened to all interested applicants, although the Eligible Entity may make prequalification submissions part of the application package. Existing qualified applicants do not need to resubmit prequalification documentation. If an applicant previously failed the prequalification process, it may choose to update its materials and seek prequalification again. Eligible Entities, however, must still ensure that applicants meet the financial and managerial capacity, technical and operational capability, and other requirements in 47 U.S.C. § 1702(g)(2)(A).

Where an applicant elects to stand on an existing subgrantee application received prior to the publication of this Policy Notice, that application shall be rescored under the rubric detailed below and may be awarded during the Benefit of the Bargain round, but no BEAD subgrantee will be permitted to recover costs to comply with the regulatory burdens eliminated in this Policy Notice. Existing applicants may also choose to submit a new application that eliminates the cost of these regulatory burdens in anticipation of competition from additional applicants. Eligible Entities must exclude all non-statutory regulatory burdens as identified above from the application and scoring processes for subgrantee selection. Eligible Entities must also allow applicants to propose to exclude select broadband serviceable locations (BSLs) that the applicant determines are excessively high-cost locations from the project area

(or would otherwise make the project economically unviable for the technology being used).

Relevant Instructions from the BEAD Restructuring Policy Notice Section 4, Page 14:

Eligible Entities must revise their list of eligible Community Anchor Institutions (CAIs) to ensure their designations conform with the statutory definition of a CAI as established by IIJA (47 U.S.C. §1702(a)(2)(E)). NTIA hereby revokes the more expansive definition adopted by the NOFO (NOFO, Section I.C.(f), pgs. 11-120). NTIA will closely review all CAI submissions and will narrowly interpret the term "community support organization" as used in the statute. NTIA reserves the right to reject any CAI designation.

1.1 **Text Box:** 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.

If the Eligible Entity has completed or is in the process of completing its Subgrantee Selection Process at the time of the release of the BEAD Restructuring Policy Notice, the Eligible Entity must use this section to describe how it conducted at least one additional "Benefit of the Bargain Round" for every BEAD-eligible location. The Eligible Entity must detail how it conducted the "Benefit of the Bargain" round, including how it addressed prequalification (if applicable) and resubmission of applications.

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 **Best and Final Offer** (BAFO) 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 BAFO 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 of the submission of this Final Proposal, ADECA has identified approximately $858,496,413.61 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 **Text Box:** 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 **Text Box:** 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 **Text Box:** 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 **Question (Y/N):** 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.

Y

2. Intentionally Omitted

This section is intentionally left blank. The BEAD program Notice of Funding Opportunity does not include a Requirement 2 for the Final Proposal.[1] Section 2 is also omitted from NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025).

[1] See, BEAD NOFO, §IV.B.9.b.

3. Timeline for Implementation (Requirement 3)

Relevant Instructions from NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include…: 3. A timeline for implementation of the detailed plan and completion of each project and other eligible activity to be funded.

Relevant Instructions from BEAD NOFO Section IV.D.2.c., Page 74:

Prospective subgrantees must submit a network design, diagram, project costs, build-out timeline and milestones for project implementation, and a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project. An Eligible Entity shall not approve any grant for the deployment or upgrading of network facilities unless it determines that the materials submitted to it demonstrate the prospective subgrantee's technical capability with respect to the proposed project.

Relevant Instructions from NOFO Section II.B, Page 18:

As established in [47 U.S.C. § 1702(h)(4)(C)], subgrantees that receive BEAD Program funds for network deployment must deploy the planned broadband network and begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant from the Eligible Entity.

3.1 **Text Box:** 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 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.

4. Oversight and Accountability Processes (Requirement 4)

Relevant Instructions from NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include…: 4. Processes for oversight and accountability to ensure the proper use of the grant funds allocated to the Eligible Entity under the BEAD Program consistent with Section IX.G of this NOFO.

Relevant Instructions from NOFO Section IV.C.1.b, Page 51:

In addition to demonstrating how it expects to satisfy the subrecipient monitoring and management requirements identified in 2 C.F.R. Part 200 Subpart D, each Eligible Entity must include sufficient accountability procedures within its program to ensure subgrantee compliance with all applicable Program requirements. Each Eligible Entity must, at a minimum, include in any subgrant agreement reasonable provisions allowing for recovery of funds in the event of a subgrantee's noncompliance with the BEAD Program's requirements, including but not limited to failure to deploy network infrastructure in accordance with mandated deadlines. Each Eligible Entity must, at a minimum, employ the following practices: (1) 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); (2) the inclusion of clawback provisions (i.e., provisions allowing recoupment of funds previously disbursed) in agreements between the Eligible Entity and any subgrantee; (3) timely subgrantee reporting mandates; and (4) robust subgrantee monitoring practices. NTIA will review proposed subgrant processes during the Initial Proposal and Final Proposal review phases and will reject Proposals that fail to provide sufficient recourse against subgrantees that do not fulfill their legal and contractual responsibilities. NTIA likewise will pursue clawback of funds directly from Eligible Entities that fail to ensure subgrantee accountability to the fullest extent of the law.

Relevant Instructions from NOFO Section IX.G.1, Pages 95:

NTIA, Eligible Entities, and subgrantees each have a critical role to play in ensuring that the BEAD Program is implemented in a manner that ensures transparency, accountability, and oversight sufficient to, among other things:

> *1. Minimize the opportunity for waste, fraud, and abuse;*
>
> *2. Ensure that recipients of grants under the Program use grant funds to further the overall purpose of the Program in compliance with the requirements of the Infrastructure Act, this NOFO, 2 C.F.R. Part 200, the terms and conditions of the award, and other applicable law; and*
>
> *3. Allow the public to understand and monitor grants and subgrants awarded under the Program.*

To that end, NTIA and Eligible Entities shall:

> *1. Conduct such audits of grantees and subgrantees as are necessary and appropriate, including audit requirements described in Section VII.G. Eligible Entities shall report the full results of any audits they conduct to the appropriate Federal Program Officer.*
>
> *2. Develop monitoring plans, subject to the approval of the Assistant Secretary, which may include site visits or desk reviews, technical assistance, and random sampling of compliance requirements.*
>
> *3. Impose specific conditions on grant awards designed to mitigate the risk of nonperformance where appropriate.*

Each Eligible Entity and/or subgrantee shall, as appropriate:

1. Comply with the reporting requirements set forth in Section I.E of this NOFO.

2. Comply with the obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions.

3. Establish and widely publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. Eligible Entities and subgrantees shall produce copies of materials used for such purpose upon request of the Federal Program Officer.

4.1 **Question (Y/N):** Does the Eligible Entity have a public waste, fraud, and abuse hotline and a plan to publicize the contact information for this hotline?

Y

4.2 **Attachments (Required):** Upload the following two required documents:

4.2(1) BEAD Program Monitoring Plan

See attached BEAD Program Monitoring Plan.

4.2(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

See attached subgrant agreement.

4.3 **Question (Y/N):** 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.

Y

5. Local Coordination (Requirement 5)

Relevant Instructions from the Infrastructure Act, 47 U.S.C. 1702 § (e)(4)(A)(ii):

The local coordination requirements ... shall include, at minimum, an opportunity for political subdivisions of an eligible entity to-

(aa) submit plans for consideration by the eligible entity; and

(bb) comment on the initial proposal of the eligible entity before the initial proposal is submitted to the Assistant Secretary.

Relevant Instructions from the BEAD Restructuring Policy Notice Section 2.4, Page 6:

NTIA concludes that an Eligible Entity shall satisfy this requirement [local coordination] by certifying that it observed the Final Proposal public comment requirements and received plan submitted by political subdivisions up until submission of the Final Proposal to NTIA.

5.1 **Text Box:** 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 response must demonstrate Eligible Entity met the following requirements:

a. The public comment period was no less than 7 days; and

b. Political subdivisions were afforded an opportunity to submit comments during the comment period.

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

6. Challenge Process Results (Requirement 6)

Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include…: 6. Description of the results of the challenge process conducted by the Eligible Entity under Section IV.B.6.

6.1 **Question (Y/N):** Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

Y

6.2 **Text Box:** 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. Unserved and Underserved Locations (Requirement 7)

Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include…: 7. Certification that the Eligible Entity will provide service to all unserved and underserved locations, if the Eligible Entity is seeking to use BEAD funding for deployment to CAIs or for other eligible activities.

Coverage of Unserved Locations

7.1 Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

Y

7.2 Text Box: 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 Attachment (Optional): If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

N/A

Coverage of Underserved Locations

7.4 Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

Y

7.5 Text Box: 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 Attachment (Optional): If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

N/A

7.7 Question (Y/N): 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 Challenge Process list 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.

Y

7.8 Intentionally omitted

This question is intentionally left blank. Question 7.8 is omitted from NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025).

7.9 Intentionally omitted

This question is intentionally left blank. Question 7.9 is omitted from NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025).

7.10 Question (Y/N): 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. (Shown as 7.8 in the NTIA portal)

Y

8. Intentionally Omitted

This section is intentionally left blank. Section 8 is omitted from this Final Proposal based on NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025), which removes Requirement 8 from the Final Proposal per the BEAD Restructuring Policy Notice.

9. Intentionally Omitted

This section is intentionally left blank. Section 9 is omitted from this Final Proposal based on NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025), which removes Requirement 9 from the Final Proposal per the BEAD Restructuring Policy Notice.

10. Intentionally Omitted

This section is intentionally left blank. Section 10 is omitted from this Final Proposal based on NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025), which removes Requirement 10 from the Final Proposal per the BEAD Restructuring Policy Notice.

11. Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience (Requirement 11)

Cost and Barrier Reduction:
Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 48:

The Final Proposal must include… : 11. Implementation status of plans described in the Initial Proposal related to:

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

Compliance with Labor Laws
Relevant Instructions from the Infrastructure Act, 47 U.S.C. § 1702 (h)(1)(A)(iv)(IV)

(A) IN GENERAL. -An eligible entity, in awarded subgrants for the deployment of a broadband network using grant funds received under this section, as authorized in subsection (f)(1) - ...

(iv) shall give priority to projects based on- ...

(IV) a demonstrated record of and plans to be in compliance with Federal labor and employment laws.

Relevant Instructions from the BEAD Restructuring Policy Notice Section 2.1, Page 4:

NTIA hereby eliminates the non-statutory requirements in the NOFO related to labor, employment, and workforce development ... Specifically, NTIA hereby eliminates the following sections of the NOFO: "Fair Labor Practices and Highly Skilled Workforce"; "Advancing Equitable Workforce Development and Job Quality Objectives"; and "Civil Rights and Nondiscrimination Law Compliance" (BEAD NOFO, Section Iv.C.1.e-g, pgs. 56-62). The related Initial Proposal and Final Proposal requirements and the corresponding reporting requirements are also eliminated (BEAD NOFO, Section IV.B.5.b.11-13, pg. 32, and BEAD NOFO, Section IV.B.9.b.11.b-c, pg. 48 and BEAD NOFO, Section VII.E.2.9,12, pgs. 90-92). The "Contracting with Small and Minority Businesses, Women's Business Enterprises, and Labor Surplus Area Firms" section is also eliminated (BEAD NOFO, Section VII.D.7, pgs. 88-89).

Low-Cost Service Option
Relevant Instructions from the Infrastructure Act, 47 U.SC. § 1702 (h)(4)(B):

(4) DEPLOYMENT AND PROVISION OF SERVICE REQUIREMENTS. - An entity that receives a subgrant under subsection (f)(1) for the deployment of a broadband network-...

(B) shall offer not less than 1 low-cost broadband service option for eligible subscribers, as those terms are defined in paragraph (5) of this subsection;

Relevant Instructions from the BEAD Restructuring Policy Notice Section 7, Pages 6-8:

NTIA hereby eliminates the non-statutory requirements in the NOFO related to the BEAD low-cost broadband service option (LCSO). Specifically, NTIA hereby eliminates the "Affordability and Low-Cost Plans" section of the NOFO and the related Initial Proposal and Final Proposal requirements to the extent they are inconsistent with this Policy Notice (BEAD NOFO, Section IV.C.2.c.i, pg. 66-68 and BEAD NOFO, Section IV.B.5.b.16, pg. 32 and BEAD NOFO, Section IV.B.9.b.11.d, pg. 48).

BEAD subgrantees must still comply with the statutory provision to offer at least one LCSO, but NTIA hereby prohibits Eligible Entities from explicitly or implicitly setting the LCSO rate a subgrantee must offer (Subgrantees must also still comply with the statutory and NOFO requirements pertaining to service level.) To be clear, NTIA will only approve Final Proposals that include LCSOs proposed by the subgrantees themselves. Finally, NTIA also hereby modifies the eligible subscriber definition (below) to align it with the Federal Communications Commission's (FCC) Lifeline Program and other Federal assistance programs.

a. LCSO Service Requirements

Consistent with IIJA, Eligible Entities shall require potential BEAD subgrantees to propose an LCSO as part of their applications that meets certain speed and performance criteria. As required by IIJA and the NOFO, the LCSO must offer speeds of at least 100/20 Mbps and latency performance of no more than 100 milliseconds. Applicants that already offer a low-cost plan that meets these service requirements may satisfy the LCSO requirement by proposing to offer their existing low-cost plan to eligible subscribers.

b. Eligible Subscriber Definition

IIJA directs NTIA to define "eligible subscriber" for the BEAD low-cost broadband service option. The NOFO adopted the eligibility requirements of the FCC's Affordable Connectivity Plan which is no longer operational. Accordingly, NTIA hereby redefines "eligible subscriber" to match the eligibility criteria for the FCC's Lifeline Program. This eligibility change aligns the BEAD LCSO requirement with an existing communications affordability program as well as other Federal benefit qualifications for low-income Americans. The definition of an Eligible Subscriber for the LCSO stated in the NOFO is hereby stricken and is replaced with the following:

> *Eligible Subscriber-The term "Eligible Subscriber" means any household seeking to subscribe to broadband internet access service that is eligible for the FCC's Lifeline Program (Lifeline eligible criteria are defined in 47 C.F.R. §54.409).*

BEAD subgrantees are responsible for verifying LCSO eligibility and may ask potential subscribers to provide the same documentation necessary to confirm eligibility as is required under the Lifeline program.

Network Reliability and Resilience
***Relevant Instructions from the Infrastructure Act, 47 U.S.C.** § 1702*

(1) SUBGRANTEE OBLIGATIONS. - A subgrantee, in carrying out activities using amounts received from an eligible entity under this section-...

> *(C) shall incorporate best practices, as defined by the Assistant Secretary, for ensuring reliability and resilience of broadband infrastructure;*

Relevant Instructions from the BEAD Restructuring Policy Notice Section 2.2, Pages 4-5:

NTIA hereby eliminates the requirements in the NOFO related to climate change, which prioritized the prior Administration's radical environmental social agenda at the expense of swift and efficient broadband deployment. Specifically, NTIA hereby eliminates the "Climate Resilience" section of the NOFO (NOFO, Section IV.C.1.h, pgs. 62-64.) and the related Initial Proposal and Final Proposal requirements (NOFO, Section IV.B.5.b.15, pg. 32, and NOFO, Section IV.B.9.b.11.e, pg. 48).

Subgrantees shall satisfy the statutory requirement to incorporate best practices defined by NTIA for ensuring reliability and resilience of broadband infrastructure by establishing risk management plans that account for technology infrastructure reliability and resilience, including from natural disasters (e.g., wildfires, flooding,

tornadoes, hurricanes, etc.), as applicable, as well as cybersecurity best practices (See, e.g., National Institute of Standards and Technology Framework for Improving Critical Infrastructure Cybersecurity, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations, NIST 800-161 Rev.1 and Key Practices in Cyber Supply Chain Risk Management: Observations from Industry, NIST IR 8276).

11.1 Text Box: 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 Question (Y/N): Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

Y

11.3 Text Box (Optional - Conditional on a 'No' Response to Intake Question 11.2): If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.

N/A

11.4 Question (Y/N): 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.[2]

Y

11.5 Text Box (Optional - Conditional on a 'No' Response to Intake Question 11.4): If the Eligible Entity does not 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, explain why the Eligible Entity was unable to do so.

N/A

[2] See, BEAD Final Proposal Guidance, NTIA, p. 60; "The federal interest period for BEAD-funded broadband infrastructure projects is ten years after the year in which the relevant subgrant has been closed out in accordance with 2 C.F.R. § 200.344. See General Terms and Conditions for NTIA BEAD Program Funds at 21 (Apr. 2024), https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf."

11.6 Question (Y/N): Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

Y

11.7 Text Box (Optional - Conditional on a 'No' Response to Intake Question 11.6): If the Eligible Entity does not certify that subgrantees have planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

N/A

12. Substantiation of Priority Broadband Projects (Requirement 12)

Relevant Instructions from the Infrastructure Act, 47 U.S.C § 1702(a)(1)(I):

(I) PRIORITY BROADBAND PROJECT.-The term "priority broadband project" means a project designed to-

(i) provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine; and

(ii) ensure that the network built by the project can easily scale speeds over time to-

(I) meet the evolving connectivity needs of households and businesses; and

(II) support the deployment of SG, successor wireless technologies, and other advanced services.

Relevant Instructions from the Infrastructure Act, 47 U.S.C. § 1702 (h)(I)(A)(ii):

... in providing funding under .. , [Eligible Entity] shall prioritize funding for deployment of broadband infrastructure for priority broadband projects

Relevant instructions from the BEAD Restructuring Policy Notice Section 3.1, Pages 8-10:

IIJA requires Eligible Entities to prioritize funding for "priority broadband projects." The statute defines a priority broadband project as one designed to:

(i) provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine; and

(ii) (ii) ensure that the network built by the project can easily scale speeds over time to -

a. meet the evolving connectivity needs of households and businesses; and

b. support the deployment of SG, successor wireless technologies, and other advanced services

Any applicant may seek to have the Eligible Entity treat its application as a Priority Broadband Project regardless of the technology used. The applicant's project, however, must still meet the required speed and latency standards set forth in the statute and the NOFO and demonstrate that it meets the additional statutory criteria, including that the project can easily scale speeds over time to support evolving connectivity needs and the deployment of SG and successor wireless technologies. Applicants 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.

Eligible Entities may not categorically exclude any given technology and may only reject treatment of an application as a Priority Broadband Project if the project could not meet the statutory definition for a specific project area. As discussed in Section 3.4 below, NTIA reserves the right to reverse an Eligible Entity's determination that a project does or does not meet the standard for a Priority Broadband Project if such determination is unreasonable.

12.1 **Text Box:** 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. Subgrantee Selection Certification (Requirement 13)

Relevant Instructions from the BEAD Restructuring Policy Notice Section 3.4, Page 12:

Eligible Entities shall score competing applications using the following criteria:

Primary Criteria. *In deciding among competing applications covering the same general project areas, Eligible Entities must choose the option with the lowest cost based on minimal BEAD Program outlay.*

> ***Minimal BEAD Program Outlay.*** *The Eligible Entity must select the combination of project proposals with the lowest overall cost to the Program. This may involve selecting a proposal that is not the lowest-cost option for a given set of BSLs but is part of the combination of selected projects with the lowest overall cost to the Program. When comparing competing proposals, Eligible Entities shall assess the total BEAD funding that will be required to complete the project (i.e., the total project cost minus the applicant's proposed match) and the cost to the Program per location (i.e., the total BEAD funding that will be required to complete the project divided by the number of BSLs the project will serve).*

Secondary Criteria. *If an application to serve the same general project area proposes a project cost within 15% of the lowest-cost proposal received for that same general project area on a per BSL basis, the Eligible Entity must evaluate such competing applications based on the following three criteria. The relative weighting of these three criteria shall be at the discretion of the Eligible Entity:*

> ***Speed to Deployment.*** *The prospective subgrantee's binding commitment to provision service by a date certain that is earlier than four years after the date on which the subgrantee will receive the subgrant from the Eligible Entity subject to contractual penalties to the Eligible Entity. Greater consideration can be awarded to prospective subgrantees promising an earlier service provision date.*
>
> ***Speed of Network and Other Technical Capabilities.*** *Eligible Entities may weigh the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.*
>
> ***Preliminary/Provisional Subgrantees.*** *For locations where Eligible Entities have already identified preliminary or provisionally selected subgrantees, Eligible Entities may give additional weight to those applications in the Benefit of the Bargain Round.*

13.1 **Text Box:** 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.

The Eligible Entity must describe the following:

1. *A summary of how the Eligible Entity applied the "Minimal BEAD Program Outlay" scoring criteria to each competitive application*

2. *If secondary criteria were applicable according to the BEAD Restructuring Policy Notice, a summary of how the Eligible Entity applied the criteria, (i.e., how points were assigned within each criterion) and identify the corresponding weights assigned to each criterion:*

- *Speed to deployment; and*
- *Speed of network and other technical capabilities as defined by the Eligible Entity;*
- *For locations where Eligible Entities have already completed their subgrantee selection process and identified preliminary or provisionally selected subgrantees, Eligible Entities will give additional weight to Preliminary/Provisional Subgrantees.*

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

14. Environmental and Historic Preservation (EHP) Documentation (Requirement 14)

Relevant Instructions from NOFO Section IV.B.9.b, Page 48:

The Final Proposal must include…: 14. Environmental documentation associated with any construction and/or ground-disturbing activities and a description of how the Eligible Entity will comply with applicable environmental and historic preservation requirements.

Relevant Instructions from BEAD Restructuring Policy Notice Section 6, Page 15:

To support NTIA's goal of issuing National Environmental Policy Act (NEPA) approvals within two weeks for an estimated 90 percent of BEAD projects and eliminate approximately 3-6 months of environmental processing per project, all Eligible Entities are hereby required to use the Environmental Screening and Permitting Tracking Tool (ESAPTT) within the NTIA Grants Portal. ESAPTT will help Eligible Entities serve as joint lead agencies for NEPA reviews by identifying applicable categorical exclusions and enabling paperless transmission of environmental documents and generation of draft and final NEPA documents. NTIA will generate ESAPTT project records from BEAD subgrant award data, which must identify any awards containing multiple NEPA project areas. Eligible Entities are further encouraged to use ESAPTT's permitting tracking capacity to evaluate and track subrecipient NEPA milestone schedules and escalate Federal right-of-way permitting issues to NTIA for interagency resolution.

14.1 Attachment (Required): 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 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.*

See attachment.

15. Consent from Tribal Entities (Requirement 15)

Relevant Instructions from NOFO Section IV.B.9.b, Page 48:

The Final Proposal must include…: 15. To the extent an Eligible Entity's Final Proposal includes plans to deploy broadband to Unserved Service Projects or Underserved Service Projects on Tribal Lands, the Eligible Entity must submit a Resolution of Consent from each Tribal Government, from the Tribal Council or other governing body, upon whose Tribal Lands the infrastructure will be deployed.

15.1 Attachment(s) (Required if any deployment project is on Tribal Lands): 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.

ADECA preliminarily awarded one project that includes one location on federally recognized Tribal Lands. That project is also indicated in the Deployment Projects CSV. The state will ensure the required Resolution of Consent is in place prior to executing the subaward agreement.

16. Prohibition on Excluding Provider Types (Requirement 16)

Relevant Requirement from the Infrastructure Act, 47 U.S.C § 1702(h)(1)(A)(iii):

(A) In general

An eligible entity, in awarding subgrants for the deployment of a broadband network using grant funds received under this section, as authorized under subsection (f)(1)-

> *(iii) may not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for such grant funds ....*

Relevant Instructions from BEAD Restructuring Policy Notice, Section 2.5, Page 6:

Eligible Entities must still adhere to the statutory requirement regarding the non-exclusion of various entities from eligibility for BEAD subgrants.

16.1 **Question (Y/N):** 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)?

Y

17. Waivers

Relevant Instructions from NOFO Section IX.E, Page 95:

It is the general intent of NTIA not to waive any of the provisions set forth in this NOFO. However, at the discretion of the Assistant Secretary, NTIA, upon its own initiative or when requested, may waive the provisions in this NOFO. Waivers may only be granted for requirements that are discretionary and not mandated by statute or other applicable law. Any request for a waiver must set forth the circumstances for the request.

Relevant Instructions from BEAD Restructuring Policy Notice Section 2, Page 4:

Eligible Entities shall eliminate the following non-statutory requirements from BEAD application scoring, subgrantee agreements, and subgrantee reporting requirements. Eligible Entities are hereby prohibited from imposing any of the obligations removed by this Policy Notice on subgrantees as part of the BEAD Program. Where state law conflicts with the requirements of this Policy Notice, Eligible Entities may seek a waiver of that requirement from the Assistant Secretary

17.1 **Text Box:** 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.

17.2 **Attachment (Optional):** If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again.

The state is not requesting a waiver.