ADVANCE COLORADO BROADBAND
Broadband Equity, Access, & Deployment

Final Proposal
NTIA's Benefit of the Bargain Round

Approved December 2025

Disclaimer

This document is a draft and its contents, including financial information, subgrantee award conditions, and commitments, are subject to change until NIST approval. Funding amounts and locations may be adjusted after location verification and prior to contract finalization.

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Overview

The Colorado Broadband Office (CBO) is pleased to present the Final Proposal of the Broadband Equity, Access and Deployment (BEAD) grant program and would like to thank the National Telecommunications and Information Administration (NTIA) staff and the NTIA Federal Program Officer for their support and guidance through the BEAD grant program process. In addition, the staff at the CBO, as well as Governor Jared Polis, his staff, Senators Michael Bennet and John Hickenlooper, Attorney General Phil Weiser, and members of the Joint Technology Committee are also commended for their leadership, oversight, collaboration and partnership that led to the successful execution of the BEAD program.

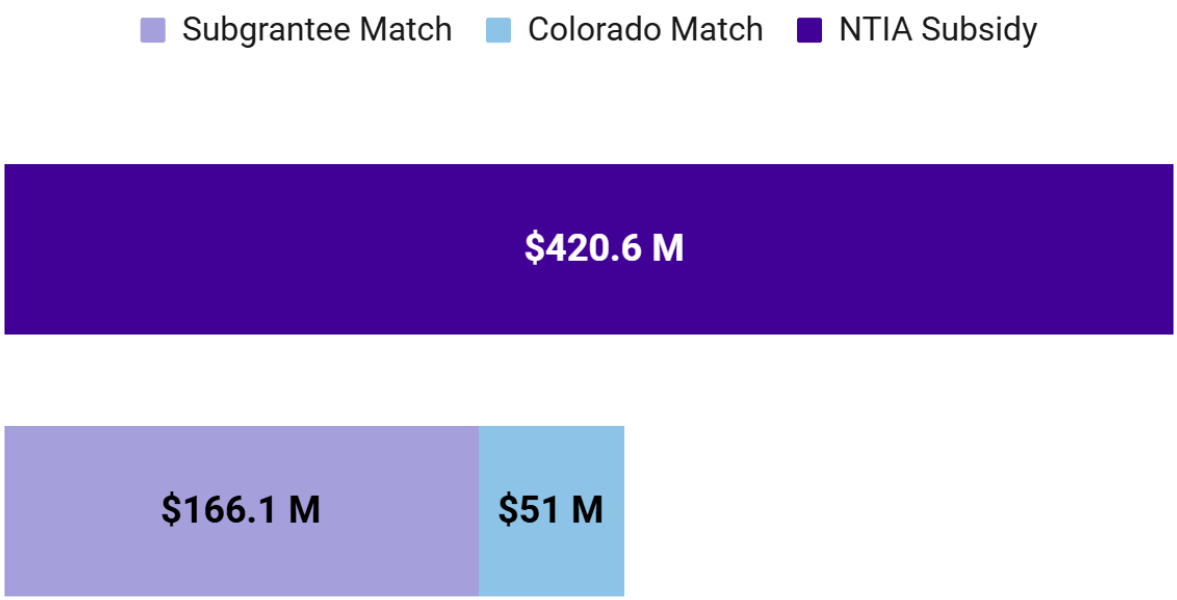
The NTIA and CBO's work has ensured we are on the path to achieving the objectives set forth by the governor to achieve broadband coverage for the State of Colorado. Accelerating broadband access will ensure Colorado's economic future, improve resiliency, help communities thrive, and ensure that everyone has access to essential activities and services needed for a better quality of life.

The NTIA's Benefit of the Bargain grant application round eliminated unrelated regulatory burdens, took a technology neutral approach and prioritized the lowest cost technology to make the best use of publicly funded resources. Colorado conducted a technology neutral, transparent, and competitive Benefit of the Bargain grant application round that minimized BEAD outlay while prioritizing the lowest cost technology that can scale over time to meet the evolving connectivity needs of households and businesses, and support successor technologies and other advanced services. Participation in the NTIA's Benefit of the Bargain round was diverse. Applicants varied from traditional broadband ISP providers, to municipalities, special districts and rural electric cooperatives, to Tribal entities.

Colorado poses unique and challenging topography and population densities with both urban and rural areas; and, of course, the Rocky Mountains running through the state,

and Tribal lands in the south west. As with many western states, the FCC (and NTIA) designated many census block groups in Colorado as High Cost. Colorado has supported state-funded broadband grant programs since 2015. And, the CBO dedicated all of its State and Local Federal Relief Funds (SLFRF) and Capital Projects Fund (CPF) to broadband. To date, over $165 million in state and federal grants has been spent on broadband. As such, the remaining unserved and underserved broadband serviceable locations (BSLs) are extremely difficult and costly to serve.

The CBO's proposed plan includes 92 awards to 25 companies and includes a mix of technologies to address Colorado's unique topography and varying population densities. The breakdown of the total anticipated project costs of nearly $638 million is illustrated below:



The total BEAD outlay dropped by approximately $400M, resulting from (1) a decrease in BEAD outlay per BSL, (2) an increased match from Applicants, (3) a decrease in locations to be served, and (4) contributions from the state.

For a list of preliminarily selected applications please see Appendix A. Preliminarily selected awards are subject to NTIA approval.

Additionally, the CBO proposes using deployment dollars to support the "national security imperative for the United States to achieve and maintain unquestioned and unchallenged global technological dominance."[1] Namely, in artificial intelligence and other transformative technologies.[2]

Now, the CBO looks forward to working closely with the NTIA and our broadband provider stakeholders to efficiently and expeditiously move to the build stage of the BEAD grant program so that all Coloradans can have a broadband connected experience.

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.

Download the CBO BEAD Final Proposal Data Uploads on the Revised BEAD Grant Program webpage.

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

Download the CBO BEAD Final Proposal Data Uploads on the Revised BEAD Grant Program webpage.

[1] See AMERICA'S AI ACTION PLAN https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf

[2] See Executive Order 14179 of January 23, 2025, "Removing Barriers to American Leadership in Artificial Intelligence," Federal Register 90 (20) 8741, www.govinfo.gov/content/pkg/FR-2025-01-31/pdf/2025-02172.pdf

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.

Download the CBO BEAD Final Proposal Data Uploads on the Revised BEAD Grant Program webpage.

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.

Download the CBO BEAD Final Proposal Data Uploads on the Revised BEAD Grant Program webpage.

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)?

No. We do not intend to serve CAIs.

1 Subgrantee Selection Process Outcomes (Requirement 1)

1.1: 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.

Subgrantee Selection Timeline

Following Colorado's Initial Proposal Volume II as modified by the BEAD Restructuring Policy Notice, CBO established and followed a subgrantee selection process that was fair, transparent, technology neutral, and competitive.

In accordance with the BEAD Restructuring Policy Notice, the CBO rescinded all preliminarily selected awards and notified applicants on June 10, 2025 that an additional Benefit of the Bargain Round would be held before preliminary award selections would be made.

The CBO then submitted its Initial Proposal Correction Letter. The letter made no revisions to the template, did not ask for waivers, and did not request a budget modification. The Initial Proposal Correction Letter was approved on July 2, 2025.

The CBO ran the Unlicensed Fixed Wireless (ULFW) process from June 16-29, 2025 and incorporated the results into the Revised Final BEAD-Eligible Location List by categorizing BSLs that were determined to be "served" by ULFW as "no BEAD" locations. We also accounted for locations that do not require BEAD funding using the reason code process to categorize those locations as "no BEAD" locations. The process resulted in approximately 66,758 BSLs being removed from the BEAD-eligible list.

The CBO published a Revised BEAD Grant Guidelines on June 30, 2025 detailing changes to the program necessitated by the BEAD Restructuring Policy Notice. The revised BEAD-eligible Locations list was published on the CBO website on July 3, 2025.

Application Window

The CBO ran the application window for the Benefit of the Bargain Round from July 7 to July 21, 2025. During this period, the CBO offered continuous support through various means such as scheduled office hours, technical assistance sessions, and frequent FAQs posted on the website. This support helped applicants complete their submissions accurately and efficiently.

The Benefit of the Bargain Round permitted all applicants — regardless of provider type, technology employed or prior participation in the program — to compete on a level playing field.

The CBO allowed applicants to stand on an existing application received prior to the publication of the BEAD Restructuring Policy Notice. Additionally, the CBO created an optional "Streamlined" Benefit of the Bargain application for returning applicants that allowed Applicants to make minor modifications to applications from prior rounds. The CBO also allowed any new applicant, or returning applicant, to apply to the Benefit of the Bargain Round using a "Standard" (full) application.

All applicants were allowed to propose to exclude select broadband serviceable locations (BSLs) that the applicant determined are excessively high-cost locations from the project area, or would otherwise make the project economically unviable for the technology being used.

Process for Preliminarily Selecting Awards

Applications were processed and evaluated in accordance with the published Revised BEAD Grant Guidelines and the BEAD Restructuring Policy Notice. The CBO published an Application Evaluation Decision Tree – a graphical representation of the evaluation process for all Applicants to review (see Figure 1). This process was also detailed in the Revised BEAD Grant Guidelines.

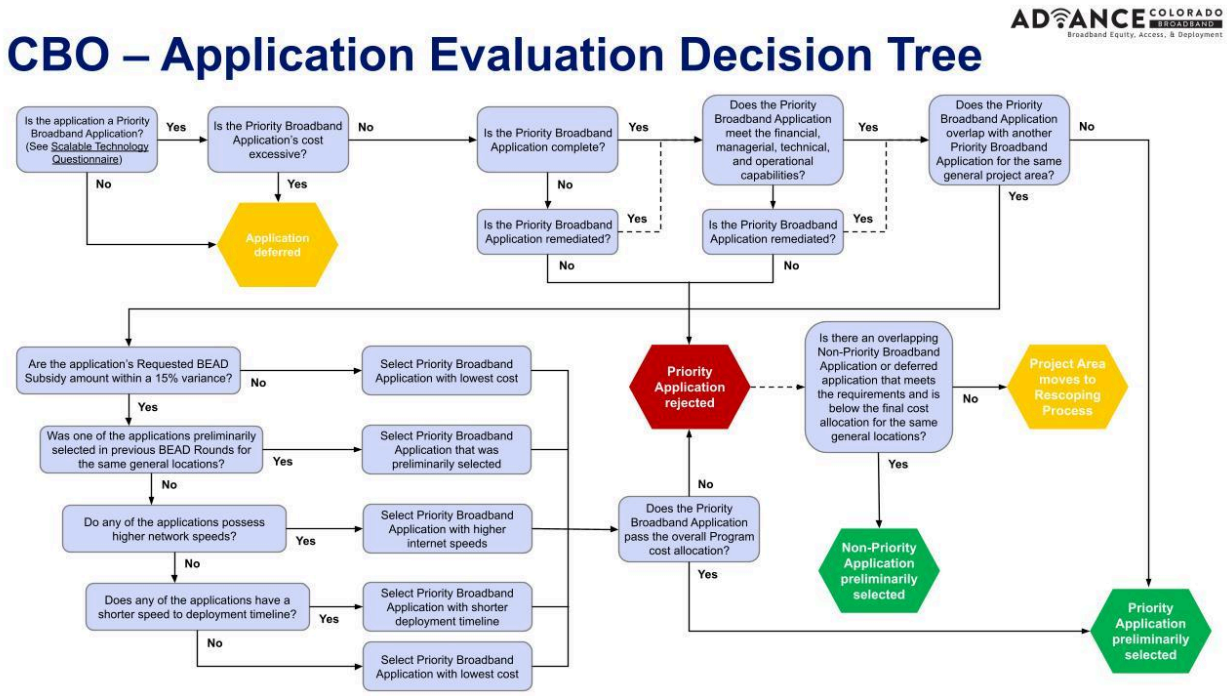


Figure 1

Priority Broadband Project Determination

As a first step in the subgrantee selection process, the CBO followed the Priority Broadband Project (PBP) determination as detailed in Section 12 below.

Excessive Cost Review

Next, the CBO reviewed applications for excessive cost. The CBO leveraged our historical state and federal grant applications data and NTIA data, and considered overall affordability under the BEAD program for maximum broadband coverage to determine excessive cost. The CBO generally reviewed the average BEAD Subsidy Request per BSL in the proposed project area, and also examined the cost characteristics of the project.

CBO reviewed match waiver requests and excessive cost applications and used State funds to meet the 25% match and decrease the BEAD subsidy required, if needed, to

arrive at an average subsidy per BSL of no more than $12,980. Only one application exceeds $12,980 and has a subsidy per BSL of $15,157.

Overall, the State contributed approximately $51M in matching funds.

Financial and Managerial Capacity, and Technical and Operational Capability Review

The CBO then evaluated applicants for their financial and managerial capacity, technical and operational capability, and other requirements in 47 U.S.C. § 1702(g)(2)(A).

For LEO providers, the CBO relies upon the NTIA's assessment and issuance of the NTIA BEAD Low Earth Orbit Provider Financial Certification.

Single Project Review (Non-Overlapping)

If there was only one proposed Priority Broadband Project for a given BSL or set of BSLs, which satisfied all requirements above, the CBO identified such Project(s) as the default preliminarily selected Application.

Where there were no Priority Broadband Applications proposing to cover BSLs in the Benefit of the Bargain Round, the CBO stood on preliminarily selected applications from Round 1 and Round 2 proposing to serve those BSLs with priority technologies, and rescored them under the Benefit of the Bargain rubric. These Applications were reviewed as Priority Broadband Projects having prior preliminary awardee status.

If no Priority Broadband Project was proposed for a given BSL, but there was only one proposed non-Priority Broadband Project, such project was identified as the default preliminarily selected Application. If more than one non-priority project was competing for the same BSLs applications moved through the review process in alignment with the Application Evaluation Decision Tree.

Overlapping Project Review (Deconfliction)

Primary Criteria: Minimal BEAD Program Outlay

When two or more applications competed for the same BSLs in a Project Area, CBO assessed their Requested BEAD Subsidy per location (i.e., the total Requested BEAD subsidy required to complete the Project divided by the number of locations included in the Project application). The Requested BEAD Subsidy is equal to the total Project cost minus the Applicant's (plus State match, if applicable) proposed match.

If a competing Priority application had a Requested BEAD Subsidy per location greater than 15% of the lowest-cost application received for the same location, the lowest cost Priority application was preliminarily selected for the BSL in question. If a competing Priority application had a Requested BEAD Subsidy per location within 15% of the lowest-cost Priority Application for the same BSL, the CBO evaluated such competing applications based on the Secondary Criteria below.

Secondary Criteria

The Secondary Criteria were implemented in a stepwise manner, with each successive Criterion only being required should the prior be unsuccessful at determining the winning application.

Criterion 1: Preliminarily Selected Subgrantee (Round 1 and Round 2 Subgrantee)

This criterion acknowledges the significant investment of time and resources already made by these Applicants.

If one Application was already preliminarily selected in Round 1 or Round 2 of the BEAD Grant Program for the same general locations, that application was preliminarily selected over the competition. If there was no Application that was preliminarily selected in Round 1 or Round 2, the CBO moved on to Criterion 2.

Criterion 2: Speed of Network and Other Technical Capacities

Criterion 2 evaluates speed of network and capacity, seeking applications that are best able to meet the growing needs of high-speed broadband service in Colorado communities.

The application with the best combination of network speed and capacity was preliminarily selected. The CBO considered, for example, 1) minimum bandwidth each subscriber will receive when all subscribers are simultaneously active during peak times and 2) the maximum available speed the network can deliver as proposed. In determining the best combination of network speed and capacity the CBO placed more weight on the project's capacity as this aspect directly influences the user experience during common internet use times.

If two or more Applications were essentially matching in the above network capabilities, the CBO turned to Criterion 3.

Criterion 3: Speed to Deployment

This criterion assessed applications based on the Applicants' commitment to providing service by an early date. Speed to deployment is based on the number of months to complete the proposed Project in the Project schedule, measured from the time of "Funding Secured" (execution of Grant Agreement) to "Handoff to Operations." The Application with the lowest speed to deployment was preliminarily selected.

If all applications have equal deployment timelines, CBO selected the lowest-cost proposal received for that same general Project Area.

Preliminarily Selected Applications

Following the process described above, the CBO has preliminarily selected the applications as detailed in the .CSV files submitted under Section 0. The CBO also submitted the preliminarily selected applications to the Governor's office for review and approval.

To address any remaining unserved and underserved BSLs, the CBO compiled a list consisting of:

1. BSLs that have received no bid; this includes BSLs omitted from Project Areas by Applicants as High-Cost BSLs, and had no other bid for those BSLs.
2. BSLs that are identified by the CBO as excessive cost, and there were no other bids for those BSLs.
3. BSLs that were declined by preliminarily awarded applicants after review of their remaining BSLs in a project area after deconfliction.

The CBO solicited bids from ISP stakeholders to serve these BSLs with Reliable Broadband Service.

Overall Program Cost Allocation

The CBO performed a final check at the end of the Subgrantee Selection process to verify that the allocated BEAD grant funds are sufficient to cover the preliminarily selected applications, and no Applications were excessive in cost when considering the specific project - location, technology, topography, population density, etc.

1.2 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.

A fair, open, and competitive process was ensured by including the opportunity for public comment for each major decision-making milestone, e.g., the map challenge process, ULFW/Reliable Broadband Service provider input, Grant Agreement template comments, publication of the Final Proposal for public comment, etc. As outlined in its Initial Proposal Volume II, as modified by the BEAD Restructuring Policy Notice, CBO followed a meticulously detailed process to ensure fairness and transparency. The CBO believes this is vital to connect all Coloradans to reliable, high-speed internet.

Steps CBO Took to Ensure a Fair Process

To ensure fairness in the Advance-BEAD program, CBO implemented several measures to mitigate bias, arbitrary decisions, and to maintain consistency and impartiality. These steps included comprehensive training for all staff and reviewers, thorough documentation of all grant activities and communications, and establishing whistleblower protections. CBO invited all provider types to participate in the Benefit of the Bargain round of funding, provided equal access to program guidelines and evaluation criteria, and offered an equal opportunity for all applicants to cure their applications through a Request for Cure (RFC) process. Applicants could also identify confidential information under the Colorado Opens Records Act (CORA). Consistent and objective evaluation criteria were uniformly applied.

Steps CBO Took to Ensure an Open Process

The CBO ensured transparency in the Advance-BEAD program by publishing accessible grant guidelines and eligibility criteria. All grant activities, including reviews, data analysis, decisions, and communications, were meticulously documented and traceable. The BEAD program was widely advertised through email, website, social media, and partner channels to maximize participation. Real-time updates, such as a daily FAQ during the Benefit of the Bargain Round, provided equal access to all interested parties. Webinars and office hours were public, with recordings available online, and guided applicants through the process and answered questions, ensuring access to necessary resources and support.

Steps CBO Took to Ensure a Competitive Process

The CBO ensured a highly competitive process through clear, objective, and consistently applied evaluation criteria, adhering to the BEAD NOFO and its Restructuring Policy Notice, as detailed in the Revised BEAD Program Grant Guidelines. The evaluation included eligibility checks and expert review (e.g., finance, engineering), allowing for merit-based selection. Applicants also had equal

opportunity to cure their applications. This rigorous process ensured the selection of the highest quality, most cost-effective proposals, free from favoritism.

Processes in Place to Ensure Training, Qualifications, and Objectiveness of Reviewers

The CBO established a robust framework for objective subgrantee selection to prevent bias. All evaluators received training on broadband infrastructure, program rules, technical standards, and evaluation criteria.

Conflicts of Interest Management

To ensure transparency and impartiality, the CBO mandated regular conflict disclosures, ethical guideline adherence, and continuous bias management training. Records of all disclosed conflicts and their resolutions, if any, were maintained to ensure accountability. These records were reviewed and updated throughout the grantmaking process to ensure that potential conflicts are addressed promptly.

Arbitrary Decision Prevention

The CBO employed clear, documented criteria to prevent bias and arbitrary decisions. Evaluation teams composed of individuals with relevant expertise were included. The approach ensured balanced perspectives and thorough documentation supports the transparency of the decision-making process.

By adhering to these structured and systematic practices, the CBO ensured a transparent, accountable, and fair subgrantee selection process. These measures collectively uphold the program's integrity, ensuring all Colorado communities benefit from reliable, high-speed internet access.

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

Yes. If the CBO did not receive any applications to provide service to Unserved, Underserved, or a combination of both locations, the CBO followed a procedure consistent with the publication of remaining available Eligible BSLs and the solicitation process outlined in Section 1.1 above.

1.4 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.

Not applicable.

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

Yes.

3 Timeline for Implementation (Requirement 3)

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

Yes, the CBO has included the following measures to ensure that subgrantees 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:

- The speed to deployment commitment is a requirement of the Grant Agreement thereby creating a binding commitment from subgrantees.
- Applicants were asked to complete a timeline, which was reviewed to ensure completion within four years.
- The following certification was required to be completed by Applicants: "I confirm our organization's project timeline, from grant agreement signature to provision of services started to all applicants desiring broadband services within the application project area, can be completed within 4 years."

The CBO is taking the following steps to ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344:

- Project completion at least 120 days ahead of the CBO's period of performance is a requirement of the Grant Agreement thereby creating a binding commitment from subgrantees.
- The CBO affirms that it will ensure each subgrantee reaches key milestones in their submitted proposals/documentation, and as imported into the Grant Agreement Statement of Work. The CBO will ensure these milestones are met through provisions in the Grant Agreement for reporting, monitoring and accountability.
- The CBO will maintain a strict monitoring process as outlined in the BEAD Monitoring Plan attachment referenced in section 4.2.
- Additionally, Colorado will ensure that any BEAD grant activities that the CBO has undertaken itself (including via contract) are completed by the end of the period of performance.

4 Oversight and Accountability Processes (Requirement 4)

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

Yes, the CBO has a page on its website to report fraud, waste, abuse & whistleblower reprisal. The page includes both a form and a phone number to submit a claim. The hotline is available from the CBO homepage and has been publicized in the CBO newsletter.

4.2 Attachments: Upload the following two required documents:

1. **BEAD program monitoring plan;**
2. **Agency policy documentation which includes the following practices:**

a. **(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. **(b) Timely subgrantee (to Eligible Entity) reporting mandates.**

Please see the following documents:

1) Please see the OIT Grant Monitoring Plan: BEAD Excerpts for the BEAD program monitoring plan.
2) See the OIT Grant Compliance and Reporting Guidelines, Chapter 3: Required Reports and Notifications for documentation on the requirements for grant reimbursement (Reporting Forms: Payment Request - OIT Form 3 section) and reporting (Quarterly Reporting Due Dates section) requirements. This document is posted publicly on the CBO's Grant Compliance Library and reimbursement request and reporting guidance is also available to grantees in the trainings posted in the Grant Compliance Library.

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

a. **Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;**
b. **Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;**
c. **Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions**

and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;

d. **Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;**
e. **Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);**
f. **Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and**
g. **Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.**

Yes.

5 Local Coordination (Requirement 5)

5.1 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 CBO provided a public comment period of seven (7) days on the Final Proposal from Aug. 22 to Aug. 29, 2025. The CBO made constituents aware of the public comment period via the CBO email listserv and the CBO website.

Public comments were submitted to the following contacts:

Website: Advance Colorado Broadband-BEAD

Email: Advance_CBO@state.co.us

Phone: 303.764.7700

The Colorado Broadband Office received comments from individuals, nonprofit organizations, trade organizations and industry, including applicants that were not awarded BEAD grants. The primary feedback included a general critique of the Benefit of Bargain round selection criteria and Priority Broadband Project classification.

The CBO received specific comments on the published BEAD Grant Agreement, and made revisions including the following:

- Removed language referencing “deploy a reasonable amount of excess conduit capacity” in response to the BEAD Restructuring Policy Notice.
- Aligned language to be consistent with definitions in the Colorado Privacy Act.

In addition, to address public comment feedback related to concerns about LEO performance, the CBO has included a budget line for low-Earth orbit compliance monitoring.

6 Challenge Process Results (Requirement 6)

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

Yes. The CBO certifies that it has successfully completed the BEAD Challenge Process and received written approval of its results from the NTIA on August 5, 2024.

6.2 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.

On June 13, 2025, we received a list of Federal enforceable commitments that impacted CBO's post challenge locations list. The updated location classifications were sent to NTIA on June 26, 2025 and posted on the CBO's Advance-BEAD Mapping Portal on July 3, 2025.

7 Unserved and Underserved Locations (Requirement 7)

7.1 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).

Yes.

7.2 : 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.

Not applicable.

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.

Not applicable.

7.4 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).

Yes.

7.5 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.

Not applicable.

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.

Not applicable.

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

Yes.

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

Yes.

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

11.1 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.

The following implementation plans described in the approved Initial Proposal, as modified by the BEAD Restructuring Policy Notice, for Requirement 11 are in progress:

- Promoting the use of existing infrastructure.
- Promoting and adopting dig-once policies.
- Streamlining permitting processes.
- Streamlining cost-effective access to poles, conduits, easements.
- Streamlining rights of way, including the imposition of reasonable access requirements.
- Lowering cost of deployment.
- Streamlining the regulatory environment.
- Improving interagency collaboration.

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

Yes.

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

Yes.

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

Yes.

12 Substantiation of Priority Broadband Projects (Requirement 12)

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

The CBO applied the definition of Priority Broadband Project (PBP) as the first step in the subgrantee selection process. See Figure 1 for a graphical representation of the subgrantee selection process. The definition applied was in accordance with the Infrastructure Investment and Jobs Act and the BEAD Restructuring Policy Notice.

Scalable Technology Questionnaire

This PBP determination primarily relied on the Scalable Technology Questionnaire that all Applicants were required to complete on a per-Project, per-technology basis (multiple technologies were allowed per Project). This analysis was performed to "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 5G, successor wireless technologies, and other advanced services." This check is required by the BEAD Restructuring Policy Notice and 47 U.S.C. §1702(a)(2)(I).

The CBO established a methodology to review components of the statutory definition of a Priority Broadband Project that was fairly applied to determine PBP status. Among several factors, the CBO reviewed answers provided by Applicants in the Scalable Technology Questionnaire to determine if the proposed technology for the particular Project Area can meet the current and future speed, latency and capacity

needs. No single factor was dispositive of determining PBP status; rather, a totality of all factors led to the determination of PBP status. The burden of sufficiently demonstrating a project should be classified as a PBP project was on the Applicant.

Priority Project Area Determination (Area Density)

The CBO also established a methodology to determine whether a Project Area qualifies as a *priority broadband project area* by adhering to the guidance provided in the NTIA's BEAD Restructuring Policy Notice and the NTIA FAQs. In making these determinations, the CBO considered factors such as the density of BEAD eligible locations per square mile within each Project Area. This analysis is crucial in evaluating potential demand and infrastructure requirements for a Project Area. By analyzing the density, the CBO aimed to prioritize Project Areas (and concentrations of broadband consumers) that would benefit most from improved connectivity and advanced services, thereby ensuring a strategic allocation of resources in line with state and federal broadband goals. Again, the CBO did not use the designation of a priority project area as a threshold requirement for PBP determination. Rather, the priority project area determination helped assess if the proposed PBP designation was appropriate for the specific project area.

Other Factors

On a Project-by-Project basis, the CBO also reviewed the high-level network design, proposed equipment, year-over-year data traffic growth assumptions, required future upgrades or deployments to inform the technology capability review. The CBO also considered the current customer base (if applicable), capacity, and the impact of adding large numbers of BEAD customers.

13 Subgrantee Selection Certification (Requirement 13)

13.1 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.

Process for Preliminarily Selecting Awards

Applications were processed and evaluated in accordance with the published Revised BEAD Grant Guidelines and the BEAD Restructuring Policy Notice. The CBO published an Application Evaluation Decision Tree – a graphical representation of the evaluation process for all Applicants to review (see Figure 1). This process was also detailed in the Revised BEAD Grant Guidelines.

Priority Broadband Project Determination

As a first step in the subgrantee selection process, the CBO followed the Priority Broadband Project (PBP) determination as detailed in Section 12 below.

Excessive Cost Review

Next, the CBO reviewed applications for excessive cost. The CBO leveraged our historical state and federal grant applications data and NTIA data, and considered overall affordability under the BEAD program for maximum broadband coverage to determine excessive cost. The CBO generally reviewed the average BEAD Subsidy Request per BSL in the proposed project area, and also examined the cost characteristics of the project.

CBO reviewed match waiver requests and excessive cost applications and used State funds to meet the 25% match and decrease the BEAD subsidy required, if needed, to

arrive at an average subsidy per BSL of no more than $12,980. Only one application exceeds $12,980 and has a subsidy per BSL of $15,157.

Overall, the State contributed approximately $51M in matching funds.

Financial and Managerial Capacity, and Technical and Operational Capability Review

The CBO then evaluated applicants for their financial and managerial capacity, technical and operational capability, and other requirements in 47 U.S.C. § 1702(g)(2)(A).

For LEO providers, the CBO relies upon the NTIA's assessment and issuance of the NTIA BEAD Low Earth Orbit Provider Financial Certification.

Single Project Review (Non-Overlapping)

If there was only one proposed Priority Broadband Project for a given BSL or set of BSLs, which satisfied all requirements above, the CBO identified such Project(s) as the default preliminarily selected Application.

Where there were no Priority Broadband Applications proposing to cover BSLs in the Benefit of the Bargain Round, the CBO stood on preliminarily selected applications from Round 1 and Round 2 proposing to serve those BSLs with priority technologies, and rescored them under the Benefit of the Bargain rubric. These Applications were reviewed as Priority Broadband Projects having prior preliminary awardee status.

If no Priority Broadband Project was proposed for a given BSL, but there was only one proposed non-Priority Broadband Project, such project was identified as the default preliminarily selected Application. If more than one non-priority project was competing for the same BSLs applications moved through the review process in alignment with the Application Evaluation Decision Tree.

Overlapping Project Review (Deconfliction)

Primary Criteria: Minimal BEAD Program Outlay

When two or more applications competed for the same BSLs in a Project Area, CBO assessed their Requested BEAD Subsidy per location (i.e., the total Requested BEAD subsidy required to complete the Project divided by the number of locations included in the Project application). The Requested BEAD Subsidy is equal to the total Project cost minus the Applicant's (plus State match, if applicable) proposed match.

If a competing Priority application had a Requested BEAD Subsidy per location greater than 15% of the lowest-cost application received for the same location, the lowest cost Priority application was preliminarily selected for the BSL in question. If a competing Priority application had a Requested BEAD Subsidy per location within 15% of the lowest-cost Priority Application for the same BSL, the CBO evaluated such competing applications based on the Secondary Criteria below.

Secondary Criteria

The Secondary Criteria were implemented in a stepwise manner, with each successive Criterion only being required should the prior be unsuccessful at determining the winning application.

Criterion 1: Preliminarily Selected Subgrantee (Round 1 and Round 2 Subgrantee)

This criterion acknowledges the significant investment of time and resources already made by these Applicants.

If one Application was already preliminarily selected in Round 1 or Round 2 of the BEAD Grant Program for the same general locations, that application was preliminarily selected over the competition. If there was no Application that was preliminarily selected in Round 1 or Round 2, the CBO moved on to Criterion 2.

Criterion 2: Speed of Network and Other Technical Capacities

Criterion 2 evaluates speed of network and capacity, seeking applications that are best able to meet the growing needs of high-speed broadband service in Colorado communities.

The application with the best combination of network speed and capacity was preliminarily selected. The CBO considered, for example, 1) minimum bandwidth each subscriber will receive when all subscribers are simultaneously active during peak times and 2) the maximum available speed the network can deliver as proposed. In determining the best combination of network speed and capacity the CBO placed more weight on the project's capacity as this aspect directly influences the user experience during common internet use times.

If two or more Applications were essentially matching in the above network capabilities, the CBO turned to Criterion 3.

Criterion 3: Speed to Deployment

This criterion assessed applications based on the Applicants' commitment to providing service by an early date. Speed to deployment is based on the number of months to complete the proposed Project in the Project schedule, measured from the time of "Funding Secured" (execution of Grant Agreement) to "Handoff to Operations." The Application with the lowest speed to deployment was preliminarily selected.

If all applications have equal deployment timelines, CBO selected the lowest-cost proposal received for that same general Project Area.

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

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 programmatic and 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 the Environmental and Historic Preservation Documentation.

15 Consent from Tribal Entities (Requirement 15)

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.

Tribal Consent for following applications:

- App-000778
- App-000356
- App-000601
- App-000294
- App-000357
- App-000358

16 Prohibition on Excluding Provider Types (Requirement 16)

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

Yes.

17 Waivers

17.1 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. If not applicable to the Eligible Entity, note 'Not applicable.'

Not applicable.

Appendix A: Preliminarily Selected Applicants

This list is subject to change until NTIA approval. Funding amounts and locations may be adjusted after location verification and prior to contract finalization.

Download the Final Proposal Data Uploads and view the map on the Revised BEAD Grant Program webpage.

Applicant	App. No.	BEAD Subsidy	Matching Funds	Locations
Amazon Kuiper	App-000700	$25.35 M	$8.45 M	42,252 (27,274 unserved)
City of Fort Collins	App-000866	$1.51 M	$0.53 M	237 (196 unserved)
City of Loveland	App-000853	$2.28 M	$0.80 M	188 (122 unserved)
Clear Creek Broadband	App-000437	$3.78 M	$1.26 M	472 (30 unserved)
Clear Creek Broadband	App-000565	$6.71 M	$3.45 M	517 (57 unserved)
ClearNetworx	App-000818	$8.08 M	$2.69 M	640 (33 unserved)
ClearNetworx	App-000805	$0.65 M	$0.22 M	60 (59 unserved)
ClearNetworx	App-000816	$1.95 M	$1.25 M	150 (69 unserved)
ClearNetworx	App-000817	$12.51 M	$16.55 M	964 (322 unserved)
ClearNetworx	App-000626	$2.70 M	$4.31 M	208 (152 unserved)
Comcast	App-000809	$2.69 M	$2.93 M	479 (166 unserved)
Comcast	App-000753	$2.36 M	$3.09 M	182 (112 unserved)

Comcast	App-000704	$0.80 M	$1.56 M	222 (139 unserved)
Comcast	App-000707	$0.15 M	$0.63 M	66 (12 unserved)
Conexon Connect	App-000785	$20.11 M	$6.70 M	2,838 (2,261 unserved)
Conexon Connect	App-000786	$2.95 M	$1.43 M	227 (224 unserved)
Conexon Connect	App-000791	$0.92 M	$1.42 M	374 (101 unserved)
Conexon Connect	App-000790	$2.16 M	$3.64 M	264 (183 unserved)
Conexon Connect	App-000788	$0.36 M	$0.65 M	174 (88 unserved)
Conexon Connect	App-000722	$0.68 M	$1.45 M	63 (57 unserved)
Conexon Connect	App-000789	$1.37 M	$5.16 M	266 (190 unserved)
Conexon Connect	App-000787	$0.45 M	$3.00 M	128 (82 unserved)
Delta Montrose Electric Assn.	App-000760	$1.78 M	$0.59 M	180 (133 unserved)
Emery Telecom. & Video	App-000731	$8.06 M	$2.69 M	1,127 (11 unserved)
Falcon Broadband	App-000734	$2.23 M	$0.93 M	673 (566 unserved)
Falcon Broadband	App-000762	$0.12 M	$0.06 M	29 (10 unserved)
FTI WIFI	App-000336	$3.22 M	$3.18 M	248 (137 unserved)
Highline	App-000798	$12.69 M	$4.23 M	1,428 (750 unserved)
Highline	App-000795	$6.78 M	$2.26 M	1,433 (1,263 unserved)
Highline	App-000792	$3.21 M	$1.07 M	490 (490 unserved)

Highline	App-000794	$1.98 M	$0.66 M	329 (197 unserved)
Highline	App-000797	$6.43 M	$2.76 M	1,569 (1,144 unserved)
Highline	App-000799	$9.69 M	$5.22 M	1,430 (1,429 unserved)
Highline	App-000793	$0.51 M	$0.31 M	39 (27 unserved)
Highline	App-000796	$6.06 M	$4.04 M	600 (382 unserved)
Highline	App-000800	$3.12 M	$2.08 M	1,032 (591 unserved)
Inventive Wireless of NE	App-000718	$7.46 M	$2.49 M	624 (452 unserved)
Inventive Wireless of NE	App-000714	$8.61 M	$2.87 M	882 (510 unserved)
Inventive Wireless of NE	App-000719	$10.05 M	$3.35 M	985 (881 unserved)
Inventive Wireless of NE	App-000711	$11.10 M	$3.70 M	961 (704 unserved)
Inventive Wireless of NE	App-000721	$9.91 M	$3.30 M	1,034 (859 unserved)
Inventive Wireless of NE	App-000716	$5.28 M	$1.91 M	407 (238 unserved)
Inventive Wireless of NE	App-000720	$9.61 M	$4.36 M	740 (540 unserved)
Inventive Wireless of NE	App-000717	$2.63 M	$3.15 M	203 (148 unserved)
Jade Communications	App-000810	$9.38 M	$3.13 M	905 (160 unserved)
Jade Communications	App-000811	$2.38 M	$1.28 M	183
Maverix Broadband	App-000737	$24.33 M	$8.11 M	2,035 (1,074 unserved)
Maverix Broadband	App-000914	$51.14 M	$17.30 M	6,023 (4,537 unserved)

Maverix Broadband	App-000911	$2.81 M	$1.03 M	260 (166 unserved)
Maverix Broadband	App-000910	$14.49 M	$6.57 M	1,116 (890 unserved)
Maverix Broadband	App-000913	$2.75 M	$1.34 M	212 (47 unserved)
Maverix Broadband	App-000909	$7.61 M	$3.74 M	586 (555 unserved)
NE Colorado Cellular	App-000754	$1.65 M	$0.59 M	485 (360 unserved)
Rebeltec Communications	App-000773	$0.87 M	$0.29 M	1,196 (266 unserved)
Resound Networks	App-000436	$1.04 M	$0.35 M	104 (4 unserved)
Resound Networks	App-000483	$1.65 M	$0.55 M	165
Resound Networks	App-000486	$0.80 M	$0.27 M	80 (1 unserved)
Resound Networks	App-000749	$0.10 M	$0.03 M	81 (67 unserved)
Resound Networks	App-000819	$0.23 M	$0.08 M	254 (91 unserved)
Resound Networks	App-000820	$0.05 M	$0.02 M	42 (29 unserved)
Resound Networks	App-000839	$0.08 M	$0.03 M	86 (25 unserved)
Smiling J (Hilltop Broadband)	App-000804	$1.07 M	$0.38 M	151
Smiling J (Hilltop Broadband)	App-000567	$6.41 M	$5.99 M	494 (293 unserved)
Smiling J (Hilltop Broadband)	App-000566	$5.36 M	$5.06 M	413 (407 unserved)
Southern Colorado Economic Development District	App-000300	$0.32 M	$0.11 M	76 (33 unserved)

Southern Colorado Economic Development District	App-000305	$1.13 M	$0.40 M	355 (1 unserved)
Southern Colorado Economic Development District	App-000330	$0.61 M	$0.21 M	184 (1 unserved)
Southern Colorado Economic Development District	App-000273	$0.81 M	$0.28 M	161
Southern Colorado Economic Development District	App-000728	$0.57 M	$0.20 M	98 (15 unserved)
Southern Colorado Economic Development District	App-000856	$0.28 M	$0.10 M	291 (267 unserved)
Southern Colorado Economic Development District	App-000859	$0.25 M	$0.32 M	161 (29 unserved)
Southern Ute Indian Tribe	App-000601	$1.38 M	$0.46 M	201 (175 unserved)
Southern Ute Indian Tribe	App-000358	$2.00 M	$1.57 M	154 (90 unserved)
Southern Ute Indian Tribe	App-000778	$12.17 M	$11.03 M	803 (644 unserved)
Southern Ute Indian Tribe	App-000357	$1.08 M	$1.23 M	83 (77 unserved)
Southern Ute Indian Tribe	App-000294	$0.96 M	$1.10 M	74 (65 unserved)
Southern Ute Indian Tribe	App-000356	$1.04 M	$1.19 M	80 (26 unserved)
Space Exploration Technologies Corp.	App-000905	$9.16 M	$8.39 M	5,400 (2,687 unserved)
Trailblazer Broadband	App-000763	$4.10 M	$1.37 M	1,030 (584 unserved)

Trailblazer Broadband	App-000709	$1.64 M	$0.55 M	178 (139 unserved)
Uintah Basin Electronic Telecommunications	App-000783	$0.48 M	$0.16 M	144 (30 unserved)
Visionary Communications	App-000772	$0.31 M	$0.10 M	89
Visionary Communications	App-000345	$1.25 M	$0.42 M	327 (32 unserved)
Visionary Communications	App-000433	$3.19 M	$1.06 M	540
Visionary Communications	App-000646	$3.47 M	$1.16 M	470 (121 unserved)
Visionary Communications	App-000764	$0.46 M	$0.15 M	162
Visionary Communications	App-000766	$0.78 M	$0.26 M	124 (40 unserved)
Visionary Communications	App-000767	$1.41 M	$0.47 M	195 (17 unserved)
Visionary Communications	App-000854	$0.39 M	$0.13 M	703 (634 unserved)
Visionary Communications	App-000432	$2.54 M	$0.89 M	800
Visionary Communications	App-000352	$1.12 M	$0.39 M	290 (98 unserved)
Visionary Communications	App-000431	$2.46 M	$0.86 M	607 (15 unserved)