CONNECTICUT'S FINAL PROPOSAL

BROADBAND EQUITY ACCESS & DEPLOYMENT (BEAD) PROGRAM

DRAFT FOR PUBLIC COMMENT

Message from Commissioner Katie Dykes

On behalf of the Connecticut Department of Energy and Environmental Protection (CT DEEP) and the State of Connecticut, I am proud to release the draft Final Proposal for the Broadband Equity, Access, and Deployment (BEAD) Program, made possible through the Infrastructure Investment and Jobs Act. This proposal outlines Connecticut's strategic plan to expand broadband access to all eligible locations across the state, in alignment with BEAD program guidelines.

This milestone reflects years of thoughtful planning, collaboration, and progress toward ensuring reliable broadband for every Connecticut resident and small business. Our journey began in 2021 with the passage of Governor Lamont's "Broadband Bill" (PA 21-159), which established ambitious goals for universal access and laid the foundation for statewide connectivity.

When the BEAD program launched in 2022, the Federal Communications Commission identified an estimated 15,758 unserved and underserved Broadband Serviceable Locations (BSLs) in Connecticut. Since then, CT DEEP has made significant strides. In 2024, we launched the ConneCTed Communities Grant Program, awarding over $34 million to support broadband infrastructure for more than 8,000 households and small businesses across the state. Working closely with our partners at the Office of Policy and Management, we corrected service provider data and location classifications, removing over 5,000 BSLs from the eligibility list. Simultaneously, broadband providers continued expanding service under their own initiative, reaching an additional 2,000 locations.

Thanks to these collective efforts, Connecticut now enters the BEAD award phase with just 724 remaining eligible BSLs, a 95% reduction from the original count. A visual summary of this progress is available here.

With most residential and business locations now served, the focus shifts to Community Anchor Institutions (CAIs): critical organizations that help residents engage online and bridge the digital divide. CT DEEP proposes to allocate $2,814,230.00 to deliver at least symmetric gigabit service to 1,066 CAIs. Combined with support from the Connecticut Education Network (CEN), this funding will empower CAIs to fulfill their missions and ensure all Nutmeggers can thrive in a digitally connected world.

A quick word about the future of the BEAD program. The non-deployment phase to follow focuses on activities that help everyone make better use of broadband, from adoption efforts to digital inclusion and skill building to digital workforce development, among others. These activities, and associated funding, are currently under federal review. As such, the status of the state's remaining BEAD allocation is yet to be determined.

We invite public comment on the Final Proposal. Feedback may be submitted via email to DEEP.Broadband@ct.gov or by mail to:
DEEP Office of Telecommunications and Broadband, 10 Franklin Square New Britain, CT 06051

All comments must be received by September 16, 2025 at 5:00 PM EST to comply with federal timelines.

Please stay connected with us at CT DEEP as we move toward Final Proposal approval and work to bring broadband to every last eligible location. Together with our partners, we continue to advance Governor Lamont's vision of a thriving economy, a digitally connected society, and equitable opportunity for all through universal broadband access.

Follow our progress at https://portal.ct.gov/DEEP/Energy/Broadband-Deployment/BEAD-Program.

In service,
Commissioner Katie Dykes

Connecticut
Department of Energy &
Environmental Protection

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SECTION 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.

View attachments at https://portal.ct.gov/DEEP/Energy/Broadband-Deployment/BEAD-Program/.

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

View attachments at https://portal.ct.gov/DEEP/Energy/Broadband-Deployment/BEAD-Program/.

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.

View attachments at https://portal.ct.gov/DEEP/Energy/Broadband-Deployment/BEAD-Program/.

0.4	Attachment (Required – Conditional on a 'Yes' Response to Intake Question 0.4):	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 approved final list from the Eligible Entity's Challenge Process results (i.e., the fabric version selected).

View attachments at https://portal.ct.gov/DEEP/Energy/Broadband-Deployment/BEAD-Program/.

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)?

Yes.

0.6	Attachment (Required – Conditional on a 'Yes' Response to Intake Question 0.6):	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.

View attachments at https://portal.ct.gov/DEEP/Energy/Broadband-Deployment/BEAD-Program/.

SECTION 1: SUBGRANTEE SELECTION PROCESS OUTCOMES

1.1	Textbox	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.

DEEP's subgrantee selection process was executed in full alignment with the framework approved by NTIA in Volume II of Connecticut's Initial Proposal, as modified by the BEAD Restructuring Policy Notice issued in June 2025. The restructuring prompted DEEP to streamline its original multi-step selection process into a more expeditious and flexible structure while preserving fairness and transparency. DEEP also took steps to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

Overview of the Streamlined Process

Initially, DEEP designed a multi-phase process for subgrantee selection, including separate Prequalification and Scoring Phases. The Prequalification Phase was originally held in November 2024, allowing potential applicants to establish their eligibility before submitting full proposals.

DEEP publicly announced the Prequalification Phase through multiple channels, including its website, email notifications, a press release, and social media. In addition, DEEP posted the prequalification materials, including the financial, managerial, and technical qualification requirements for applicants online, and conducted an online workshop to provide guidance. A dedicated email address was maintained to assist applicants, and FAQs were regularly updated to ensure transparency. Upon completion of the review, applicants who met the prequalification criteria were notified of their eligibility to proceed to the Scoring Phase.

In accordance with the updated federal guidance in the BEAD Restructuring Policy Notice (RPN), these phases were consolidated into a single application window during the post-RPN round. This revised

structure retained core principles of eligibility screening, merit-based evaluation, and strategic negotiation, while eliminating non-statutory elements and enhancing flexibility for applicants.

Qualification and Scoring Phase

Under the revised approach following the BEAD Restructuring Policy Notice, DEEP rescinded preliminary awards from the pre-RPN round and conducted a combined Qualification and Scoring Phase during the post-PRN round. This process allowed entities that had not previously been prequalified to complete their qualification documentation as part of their full application submission. Entities that had already completed prequalification were not required to resubmit existing documentation.

Additionally, applicants with previously submitted proposals were afforded two options:

- Request rescoring of their existing submission under the modified criteria, or
- Submit a revised application

All applications were evaluated in accordance with NTIA-approved criteria, emphasizing:

- Technical and managerial capacity
- Financial stability
- Alignment with BEAD objectives, including prioritization of unserved and underserved areas
- Equal opportunity for all technology types
- Cost-effectiveness and scalability of proposed solutions

This approach enabled DEEP to uphold merit-based principles while accommodating the compressed timeline and new flexibilities afforded under the BEAD Restructuring Policy Notice.

Negotiation Phase

Following the scoring process, DEEP entered into a Negotiation Phase with applicants that proposed qualifying Priority Broadband Projects. The purpose of this phase was to refine project area boundaries and pricing to achieve the combination of project proposals with the lowest overall cost to the program. This may have involved selecting a proposal that is not the lowest-cost option for a given set of locations but was part of the combination of selected projects with the lowest overall cost to the program.

Key negotiation topics included:

- **Project Area Adjustments**: DEEP worked with applicants to maximize Priority Broadband Project coverage of Town Grant Areas.
- **Competitive Pricing**: In cases with multiple applicants for the same general area, DEEP facilitated best-and-final offers to achieve cost savings.
- **Multi-Area Awards**: Applicants proposing to serve multiple areas were engaged on pricing adjustments to maximize scale efficiency.
- **Technology Modifications**: Where excessively high-cost locations posed a barrier, DEEP negotiated alternative solutions, including the selection of non-Priority Broadband Projects, consistent with BEAD requirements.

These negotiations were essential to ensuring that provisional awards represented the best value to the state and to taxpayers.

Provisional Award Phase

Upon conclusion of the negotiation process and following its Special Award Conditions Meeting with the NTIA, DEEP issued notification of the provisional grant awards to selected applicants. These awards are contingent upon:

- Final compliance with all applicable BEAD statutory and programmatic requirements
- Demonstrated financial, technical, and operational readiness

All provisional awards will be included in the formal submission of Connecticut's Final Proposal submitted to NTIA. Contract execution with subgrantees will be finalized only after NTIA approval.

Provisional awards are subject to a 7-day public comment period to promote transparency and offer stakeholders an opportunity to provide feedback prior to finalization.

Subgrant Accountability and Compliance Measures

Final contracts executed with selected subgrantees will incorporate robust oversight mechanisms, including:

- **Fixed Amount Subaward Disbursement**: Tying payments to project milestones
- **Clawback Provisions**: Reclaiming funds in cases of non-compliance or underperformance
- **Monitoring and Reporting Requirements**: Integrated oversight measures to prevent waste, fraud, and abuse through financial controls and tracking of project progress
- **Prohibition on Funding Already-Built Locations:** Contractual safeguards to ensure funds are directed only toward eligible locations, preventing expenditure on locations with existing qualifying broadband service.

In cases where an applicant fails to execute their awarded project(s), DEEP reserves the right to declare the award in default and reallocate funding to qualified alternates, including prior applicants or providers in adjacent areas.

By implementing a streamlined subgrantee selection process that merges qualification and scoring, DEEP has demonstrated compliance with the revised framework approved in Volume II of the Initial Proposal and the modifications introduced by the BEAD Restructuring Policy Notice. This adaptive approach ensures:

- Efficient deployment of BEAD funding
- Continued transparency and a competitive selection process
- Expansion of broadband access across Connecticut's unserved and underserved communities

DEEP remains committed to executing the BEAD program with integrity, efficiency, and responsiveness to evolving federal guidance.

1.2	Textbox	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.

Ensuring a Fair, Open, and Competitive Process in Subgrantee Selection

DEEP implemented a rigorous and transparent process to ensure fairness, openness, and competitiveness in selecting subgrantees for broadband deployment under the BEAD program that allowed all applicants, regardless of the technology used or previous participation in the program, to compete under consistent criteria following the removal of certain non-statutory requirements in the BEAD Restructuring Policy Notice. DEEP upheld its commitment to an equitable selection process through structured eligibility, transparent evaluation, expert review, and continuous stakeholder engagement.

Openness and Transparency

DEEP ensured openness and transparency throughout the restructured subgrantee selection process, consistent with the BEAD Restructuring Policy Notice:

- **Broad Eligibility and Participation:** The grant opportunity remained open to a wide range of entities. All qualified applicants, regardless of prior participation or technology employed, were able to submit proposals under the modified framework.
- **Equal Access to Information:** All relevant application materials, evaluation criteria, and procedural guidance were made publicly available via DEEP's website and distributed directly to relevant parties.
- **Stakeholder Engagement:** DEEP continued to solicit and incorporate community input. A public comment period on provisional awards enabled stakeholders to review and provide feedback prior to inclusion in the Final Proposal.
- **Technical Support for Applicants:** DEEP offered technical assistance throughout the process, including public webinars, a dedicated support email address, and regular updates to FAQs to ensure applicants had access to timely and accurate information.

Fair and Objective Evaluation Process

DEEP preserved a fair, transparent, and consistent evaluation process, even as the application structure was streamlined in accordance with the BEAD Restructuring Policy Notice:

- **Published Scoring Criteria:** DEEP shared the updated scoring rubric with applicants to outline how applications would be evaluated and ensuring clarity and consistency in the review process.
- **Integrated Qualification and Evaluation:** Under the revised process, applicants completed both qualification and scoring requirements within a single submission window. This ensured an efficient, unified evaluation while maintaining rigorous standards related to financial, technical, and operational capabilities.

- **Impartial Assessment:** Applications were reviewed using objective criteria aligned with the BEAD Restructuring Policy Notice and Connecticut's broadband priorities. Proposals were evaluated based on their ability to address unserved and underserved areas cost-effectively and efficiently.
- **Support for Effective Solutions:** The competitive process encouraged applicants to propose scalable, high-quality broadband deployment solutions that aligned with the state's goals and the program's statutory obligations.

Ensuring Reviewer Objectivity and Qualifications

DEEP took deliberate steps to ensure that the individuals reviewing applications were qualified, objective, and free from conflicts of interest:

- **Expert Review Panel:** DEEP engaged multidisciplinary experts to provide comprehensive expertise in evaluating subgrantee applications.
- **Ethics and Confidentiality Agreements:** Reviewers were required to sign agreements affirming their commitment to impartiality and confidentiality. This measure ensured that reviewers had no conflicts of interest and that the process remained free from bias, collusion, or self-dealing.
- **Compliance with State Laws:** DEEP adhered to Connecticut's conflict-of-interest laws (Conn. Gen. Stat. § 1-85), preventing public officials from taking official action in matters where they had a substantial conflicting interest.

Commitment to Fair Competition

DEEP ensured that competition among applicants remained a core principle of the BEAD selection process:

- **Broad Eligibility and Inclusion:** The program encouraged participation from all types of service providers, non-profits, and private entities, fostering competition and innovation.
- **Low Administrative Burden:** DEEP designed the application process to be accessible to entities of all sizes, reducing unnecessary complexity and ensuring that smaller providers had a fair opportunity to compete.
- **Clear and Inclusive Eligibility Criteria:** Requirements were structured to ensure that entities met the necessary qualifications without being overly restrictive.

By adhering to these principles and processes, DEEP upheld its commitment to a fair, open, and competitive selection process. Transparency, clear guidelines, and rigorous safeguards against conflicts of interest ensured that the BEAD subgrantee selection was conducted with integrity, ultimately delivering broadband access to unserved and underserved communities in Connecticut.

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

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

1.4	Textbox	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.

Connecticut began with 6,888 Community Anchor Institutions (CAIs) approved in the Initial Proposal, and through the Challenge Process removed 5,351. This careful refinement required a thorough audit, stakeholder engagement, and multiple levels of verification to ensure the final list was accurate, defensible, and aligned with federal guidance.

At the NTIA's request, Connecticut then revised its eligible Community Anchor Institution list to align to Section 4 of the BEAD Restructuring Policy Notice. DEEP conducted a full audit of the CAI list, identifying and removing:

- Type C correctional facilities that were determined to serve only incarcerated individuals
- CAIs determined to now be served by non-subsidized service
- Locations determined to be duplicates in the list or inactive

This resulted in the removal of 341 CAIs. Each removal was documented with the rationale and confirmation that remaining CAIs meet the statutory criteria.

On July 15, an FAQ issued by NTIA further refined the definition of "community support organization" to mean a facility located in a government-owned building that provides publicly accessible internet service and currently offers digital skills training. Because Connecticut's application window was already open at that time, DEEP reviewed submissions and preliminary awards to remove any CAIs that no longer qualified before issuing provisional awards. Of the CAIs that are included in preliminary awards, DEEP removed 26 additional locations from eligibility because they did not meet one or more of the required criteria of a Type C CAI.

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.

Yes.

SECTION 3: TIMELINE FOR IMPLEMENTATION

3.1	Textbox	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.

DEEP has taken comprehensive measures to ensure compliance with the outlined programmatic and performance requirements for all BEAD subgrantees.

Ensuring Service Availability Within Four Years

DEEP will incorporate strict performance milestones into its subgrant agreements to ensure that each subgrantee begins providing broadband service to all customers within the project area who desire service no later than four years after the subgrant is awarded. Compliance will be monitored through regular progress reporting and site inspections to verify adherence to project timelines and service deployment commitments.

Completion of Subgrant Activities 120 Days Before End of Performance Period

DEEP will establish clear contractual requirements mandating that all subgrantees complete their project activities at least 120 days prior to the end of the Eligible Entity's period of performance, in compliance with 2 C.F.R. 200.344. This buffer period allows time for final reporting, financial reconciliation, and any necessary closeout procedures to ensure that all administrative and regulatory requirements are met. Progress tracking mechanisms will be implemented to monitor project completion against this deadline, with corrective action plans in place for any subgrantee at risk of delay.

Completion of All BEAD Programmatic Activities by End of Performance Period

DEEP is committed to ensuring that all programmatic BEAD grant activities under its direct purview are completed within the designated performance period. A comprehensive project management strategy will include milestone tracking, stakeholder coordination, and ongoing risk assessment, to ensure timely execution and compliance with federal regulations. Regular reporting and evaluation will further support adherence to 2 C.F.R. 200.344, ensuring that all activities are completed as required before the period of performance concludes.

SECTION 4: OVERSIGHT AND ACCOUNTABILITY PROCESSES

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?

Yes.

4.2	Attachments	Upload the following two required documents: (1) BEAD program monitoring plan; (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.

View attachments at https://portal.ct.gov/DEEP/Energy/Broadband-Deployment/BEAD-Program/.

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.

Yes.

SECTION 5: LOCAL COORDINATION

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 State of Connecticut has established a 7-day public comment period for this draft as required by the BEAD Program. During this time, stakeholders and members of the public are invited to review the draft and provide written feedback.

The draft has been posted publicly on DEEP's website and has been announced through multiple communication channels to ensure broad awareness and accessibility.

All comments received during this period will be reviewed carefully by DEEP staff. Following the close of the public comment period, DEEP will prepare a summary of the comments received along with an explanation of how it has addressed them. This summary will be incorporated into the final submission to the National Telecommunications and Information Administration (NTIA).

Section 6: CHALLENGE PROCESS RESULTS

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.

Yes.

6.2	Textbox	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 final location classifications were posted to https://portal.ct.gov/deep/energy/broadband-deployment/bead-program on Wednesday, December 18, 2024.

Section 7: UNSERVED AND UNDERSERVED 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).

Yes.

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.

Connecticut determined that 112 unserved locations could not reasonably be served due to excessively high costs. This conclusion was reached following negotiations with applicants during the BEAD application process. Applicants submitted cost estimates that were prohibitively high (some on the order of $14 million per location) reflecting the uniquely difficult environmental and geographic conditions associated with these sites. For example, a subset of the locations are situated on islands, where service would require undersea cabling and other extraordinary construction measures, making deployment costs unreasonably excessive compared to typical broadband expansion efforts.

These locations were originally preliminarily awarded to a Low Earth Orbit (LEO) satellite provider, a technology that could have offered a more cost-effective solution. However, that provider ultimately withdrew its proposals. Other prequalified applicants, such as those offering fixed wireless, chose not to apply and could not be utilized. As a result, there were no viable or cost-reasonable proposals available to serve these locations.

Accordingly, the State has made a strong showing that the cost to serve this small group of 112 locations is unreasonably excessive, and that despite active engagement with potential providers, there remains no feasible or cost-effective means of reaching them under the BEAD Program.

7.3	Text Box (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

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).

Yes.

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 unreasonable excessive, explain and include a strong showing of how the Eligible Entity made that determination.

Connecticut determined that 49 underserved locations could not reasonably be served due to excessively high costs. This conclusion was reached following negotiations with applicants during the BEAD application process. Applicants submitted cost estimates that were prohibitively high (some on the order of $14 million per location) reflecting the uniquely difficult environmental and geographic conditions associated with these sites. For example, a subset of the locations are situated on islands, where service would require undersea cabling and other extraordinary construction measures, making deployment costs unreasonably excessive compared to typical broadband expansion efforts.

These locations were originally preliminarily awarded to a Low Earth Orbit (LEO) satellite provider, a technology that could have offered a more cost-effective solution. However, that provider ultimately withdrew its proposals. Other prequalified applicants, such as those offering fixed wireless, chose not to apply and could not be utilized. As a result, there were no viable or cost-reasonable proposals available to serve these locations.

Accordingly, the State has made a strong showing that the cost to serve this small group of 49 locations is unreasonably excessive, and that despite active engagement with potential providers, there remains no feasible or cost-effective means of reaching them under the BEAD Program.

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.

Yes.

7.8	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.

Yes.

Section 11: IMPLEMENTATION STATUS OF PLANS FOR COST AND BARRIER REDUCTION, COMPLIANCE WITH LABOR LAWS, LOW-COST PLANS, AND NETWORK RELIABILITY AND RESILIENCE

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.

Yes.

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.

Yes.

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 10year Federal interest period, explain why the Eligible Entity was unable to do so.

n/a

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

Yes.

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 ensured 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

Section 12: SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS

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.

Application of the Definition of Priority Broadband Project

The Connecticut Department of Energy and Environmental Protection (DEEP) applied the definition of Priority Broadband Project from the Infrastructure Investment and Jobs Act and the BEAD Restructuring Policy Notice through a structured, data-driven analysis aligned with the requirements and guidance in NTIA's BEAD Restructuring Policy Notice and FAQs. This process ensured a consistent, fair, and technology-neutral evaluation of each BEAD project application against the statutory criteria for a Priority Broadband Project.

Step 1: Verification of Required Documentation

In accordance with the BEAD Restructuring Policy Notice, DEEP first evaluated whether each applicant submitted "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." This threshold review ensured that only applications with adequate and project-specific technical information proceeded to the substantive engineering evaluation.

Step 2: Assessment Against Priority Broadband Project Standards

For applications meeting the documentation requirement, DEEP then determined whether the proposed projects satisfied the BEAD Restructuring Policy Notice definition of a Priority Broadband Project:

- Broadband service speeds of at least 100 Mbps/20 Mbps
- Latency less than or equal to 100 milliseconds
- Ability to easily scale speeds to meet future connectivity needs

- Capability to support 5G, successor wireless technologies, and other advanced services

Methodology

DEEP, through its broadband engineering consultant, developed and implemented a standardized review methodology that directly addressed each element of the statutory and policy definition of a Priority Broadband Project. This methodology:

- Ensured project-by-project, area-by-area determinations, as directed by NTIA, rather than making statewide or applicant-wide assumptions.
- Required technology-specific data submissions, including network architecture, capacity, latency, and scalability information, tailored to fiber, hybrid fiber-coaxial, licensed and unlicensed fixed wireless, and low-earth orbit satellite technologies.
- Incorporated performance modeling and engineering review to validate applicant claims against objective technical standards.

This approach allowed for an informed, evidence-based determination of whether each proposed project met the Priority definition for the specific geographic area served. Data requests were designed to minimize applicant burden while ensuring reviewers had sufficient information to reach a technically defensible conclusion. All evaluations were conducted or overseen by licensed Professional Engineers with extensive broadband engineering experience.

Technology-Specific Analyses

The engineering review process was designed to differ by technology type to address relevant performance considerations; however, while the processes varied, they were applied in an equitable manner:

- Fiber: Review of access/distribution capacity, backhaul, latency, scalability, and ability to support 5G and advanced services.
- Hybrid Fiber-Coaxial: Evaluation of DOCSIS version, capacity, latency, scalability, and 5G readiness.
- Licensed & Unlicensed Fixed Wireless: Assessment of spectrum use, equipment specifications, signal strength, performance at each BSL, interference mitigation, capacity modeling, scalability, and 5G support.
- Low-Earth Orbit (LEO) Satellite: Analysis of spectrum use, beam coverage, capacity per project area, backhaul, latency, obstruction management, satellite handoffs, and scalability.

Results

Of the 289 BEAD project applications reviewed:

- 204 met both requirements: Sufficient documentation and demonstration of compliance with Priority Broadband Project performance standards. These included 159 fiber projects and 45 hybrid fiber-coaxial projects.

- No LEO satellite projects met the Priority definition. 85 LEO satellite proposals were found to lack adequate project-area-specific capacity and scalability analysis, preventing confirmation that the statutory performance requirements could be met for the proposed BSLs.
- Connecticut received no fixed wireless applications.

After initially determining that the 85 LEO satellite proposals lacked adequate project-area-specific capacity and scalability analysis, DEEP took the additional step of conducting further review with a second consultant. This step was taken to ensure that no potential Priority project was overlooked and that all determinations were made consistent with the BEAD Restructuring Policy Notice.

As part of this review, DEEP first examined the maximum speeds reported in the applications to assess whether they could be used to support scalability. The analysis found that the proposed maximum speeds in each project area were limited to the BEAD minimum performance requirement of 100 Mbps/20 Mbps, which did not provide evidence of scalability beyond the baseline. DEEP also reviewed independent Ookla speed test data and found that the LEO applicant's reported mean (17.46 Mbps) and median (16.32 Mbps) upload speeds were currently below the BEAD threshold of 20 Mbps. This analysis further informed DEEP's understanding of the reliability of current service levels but did not provide support for the applicant's claim of Priority status in light of the limitations of their submitted materials.

In addition, DEEP's consultant applied a high-resolution methodology incorporating tree canopy data, Connecticut building footprints, and USGS elevation data to assess potential sky-view obstructions at the structure level. This analysis provided a precise, location-specific evaluation of whether proposed service areas could sustain reliable broadband performance under real-world conditions. The results indicated that a significant portion of Connecticut locations could face obstruction-related challenges that could diminish service quality, even under favorable assumptions. While this additional analysis ultimately did not alter DEEP's determination regarding the Priority status of the LEO proposals, it ensured that all avenues, including project-area-specific reported speeds, independent performance data, and environmental factors, were reviewed in order to make a determination fully aligned with BEAD Program requirements.

Following the process described above, but prior to notification of their nonpriority status, the applicant proposing LEO technology contacted DEEP to withdraw all proposals in order to concentrate their resources on states with a greater number of eligible locations.

DEEP's process for applying the definition of Priority Broadband Project rigorously adhered to the Infrastructure Act, BEAD NOFO as modified by the BEAD Restructuring Policy Notice, and NTIA guidance. By requiring sufficient, project-specific technical documentation and employing a standardized, technology-appropriate engineering analysis, DEEP ensured that Priority Broadband Project status was awarded only to those proposals that demonstrably met or exceeded the federal performance criteria in the specific geographic areas they intended to serve. Each application was evaluated individually, and Priority status was conferred only where the evidence supported such a finding for the specific project area under review.

Section 13: SUBGRANTEE SELECTION CERTIFICATION

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.

DEEP applied the scoring criteria to each competitive project application in full alignment with the prioritization framework set forth in Section 3.4 of the BEAD Restructuring Policy Notice. All proposals covering the same general project areas were evaluated first against the Primary Criterion, with Secondary Criteria applied when proposals were within the cost proximity threshold described below.

Primary Criterion: Minimal Cost to the BEAD Program

The primary criterion used to score competing applications was the minimal total BEAD outlay, in accordance with the BEAD Restructuring Policy Notice. DEEP prioritized proposals that would deliver service to the greatest number of locations for the lowest total BEAD expenditure.

To determine minimal BEAD outlay, DEEP evaluated two key cost measures:

- Total BEAD Funding Requested: Calculated as the total project cost minus the applicant's proposed matching contribution.
- Cost per Location: Calculated as the BEAD funding requested divided by the number of locations the project would serve.

This methodology ensured that funding decisions balanced cost efficiency with maximum coverage of unserved and underserved locations.

Secondary Criteria and Weighting

If two or more proposals to serve the same general project area had per-location costs within 15% of each other, DEEP applied the following weighted Secondary Criteria, consistent with the BEAD Restructuring Policy Notice and NTIA guidance:

- Speed to Deployment (10%): Preference was given to applicants committing to begin service earlier than four years from the subgrant award date, with contractual penalties for missed deadlines.
- Network Speed and Technical Capabilities (50%): DEEP assessed the proposed network's performance beyond minimum requirements, including projected speed, latency, reliability, and scalability.
- Preliminary or Provisional Status (40%): Additional weight was assigned to applicants previously designated as preliminary or provisional subgrantees in earlier phases of the BEAD Program.

The resulting scores ensured that funding decisions were consistent, transparent, and in compliance with the prioritization framework in Section 3.4 of the Policy Notice.

Section 14: ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) DOCUMENTATION

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 chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at https://www.firstnet.gov/network/environmental-compliance/projects/regionalprogrammatic-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.

View attachments at https://portal.ct.gov/DEEP/Energy/Broadband-Deployment/BEAD-Program/.

Section 15: CONSENT FROM TRIBAL ENTITIES

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.

Pending.

Section 16: PROHIBITION ON EXCLUDING PROVIDER TYPES

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)?

Yes.

Section 17: WAIVERS

17.1	Textbox	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.'

n/a

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.

n/a