# A Connected Florida: Access, Opportunity, Workforce, Prosperity, Resiliency

FloridaCommerce: BEAD Final Proposal (DRAFT)

October 2025

State of Florida



Florida Office of Broadband
Florida Department of Commerce



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# **Final Proposal Data Submission**

- 0.1. Attachment (Required): Complete and submit the Subgrantees CSV file (named "fp\_subgrantees.csv") using the NTIA template provided.
  - See Attachment A.
- 0.2. Attachment (Required): Complete and submit the Deployment Projects CSV file (named "fp\_deployment\_projects.csv") using the NTIA template provided
  - See Attachment B.
- 0.3. Attachment (Required): Complete and submit the Locations CSV file (named "fp\_locations.csv") using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.
  - See Attachment C.
- 0.4. Attachment (Required: Complete and submit the No BEAD Locations CSV file (named "fp\_no\_BEAD\_locations.csv") using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.
  - See Attachment D.
- 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)?
  - Not Applicable. Florida's BEAD Program opted not to serve Community Anchor Institutions (CAIs) in lieu of funding other initiatives to support broadband deployment, such as workforce programs. While CAIs were not eligible for funding in the FloridaCommerce BEAD Deployment Program, the Office acknowledges that extending broadband infrastructure to surrounding residential and businesses will also facilitate long-term broadband access for CAIs.
- 0.6. Attachment (Required Conditional on a 'Yes' Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named "fp\_cai.csv") using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity's compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity's Challenge Process results.

Not Applicable.

# Requirement 1: Subgrantee Selection Process Outcomes

1.1. Text Box: Describe how the Eligible Entity's deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice.

The Florida Office of Broadband ("the Office") housed within the Florida Department of Commerce ("FloridaCommerce") implemented a multi-step deployment Subgrantee Selection Process to solicit applications from potential subgrantees for the ConnectedFlorida BEAD Deployment Program. This process remained consistent with the approach approved by National Telecommunications and Information Administration ("NTIA") in Volume II of the Initial Proposal and was adapted to the timeline and requirements outlined in the BEAD Restructuring Policy Notice. The schedule and each step of this process are described below.

### **Deployment Subgrantee Selection Process Schedule**

The Office followed the schedule below, Table 1, for key milestones of the deployment Subgrantee Selection Process.

Table 1. Deployment Subgrantee Selection Process Schedule

Date	Milestone	
05/05/2025	Pre-Registration Window Opened	
06/06/2025	NTIA BEAD Restructuring Policy Notice Released	
07/08/2025	Finalized Project Areas and BEAD Eligible Locations List Published	
07/08/2025	BEAD Technical Assistance Webinar	
07/14/2025	BEAD Application Walk Through Webinar	
07/14/2025 - 08/04/2025	Application Window (Open to Close)	
08/04/2025 - 09/12/2025	Application Review, Scoring, Negotiations, and Preliminary Awards	
09/12/2025 - 09/25/2025	Final Proposal Finalization	
09/26/2025 - 10/02/2025	Final Proposal Public Comment Period	
10/03/2025	Final Proposal Submitted to NTIA	

### **Deployment Subgrantee Selection Process**

The illustration below, Figure 1, depicts the deployment Subgrantee Selection Process implemented by the Office, also referred to as the 'Benefit of the Bargain Round". In accordance with the BEAD Restructuring Policy Notice<sup>1</sup>, the process consisted of a single competitive application round that allowed for technology neutrality and prioritized Priority Broadband Projects over non-Priority Broadband Projects. The definition of Priority Broadband Projects and how the Office applied this definition is described in further details in Section 12. Substantiation of Priority Broadband Projects. By adopting this structure, the Office advanced the ConnectedFlorida BEAD Deployment Program's objective of expanding access to reliable broadband to unserved and underserved areas across the

<sup>&</sup>lt;sup>1</sup> More information on the revised requirements for the Benefit of the Bargain Round can be found in the NTIA BEAD Restructuring Policy Notice.

state while aligning with NTIA's focus on minimizing the costs of deployment.

Pre-Application Pre-Registration (2) **Close Application** Publish **Application Window Application** Window and Review **Project Areas** Opens Within Portal **All Applications** Preliminary Proceed with Risk **Preliminary** Targeted Outreach if Selection of Assessment of Selection Subgrantees for **Unclaimed Locations Preliminary Selected** Applicants Project Areas (8) (10)Subgrantee **Provisional** Submit Final Proposal Selection Review Final Grant Award to NTIA Meeting with NTIA

Figure 1: Deployment Subgrantee Selection Process

### **Pre-Application**

### 1. Pre-Registration

On May 5, 2025, the Office launched the pre-registration window for the ConnectedFlorida BEAD Deployment Program via the <u>FloridaCommerce Broadband Grant Portal</u>. Applicants were required to pre-register to apply to the program. The purpose of pre-registration was to confirm Applicants' eligibility, gather insights into anticipated participation, and facilitate communication between the Office and Applicants to verify key information before the application window opened. Key information requested from Applicants included:

- Primary contact information
- Address
- Unique Entity Identification (UEI) Number associated with the entity within the Sam.gov system
- Unique Employer Identification (EIN) Number associated with the entity within the Sunbiz system
- Webpage URL
- Entity Category (i.e., broadband provider, tribal government, local government, technical college, state college, state university, K-12 institution, non-profit organization, private educational institution, workforce board, community action agency, other)

Upon approval of the pre-registration, the Office delivered credentials to eligible Applicants to view and access the application once the application window opened.

### Application

### 2. Publish Project Areas

The Office defined the project areas eligible for bid in advance of opening the application window, giving eligible Applicants the ability to view the specific projects areas for which they could apply. To

define the project areas, the Office first evaluated the BEAD-eligible unserved and underserved Broadband Serviceable Locations (BSLs) in each county. After further analysis of each county, the Office redesigned some counties into customized geographic units to fit the needs of the communities on the ground. Counties and where applicable, the geographic units within the county, were referred to as the "project areas".

The borders of Florida's federally recognized tribes were also accounted for in the creation of project areas. The Office ensured that no non-Tribal project areas included locations on Tribal lands in part. In other words, project areas either had 100% of locations on Tribal land or zero percent.

On May 6, 2025, the Office published the FloridaCommerce BEAD Project Areas Commentary Dashboard for public review and comment. The public comment period remained open until roughly May 23, 2025. Following the public comment period, the Office published the final Project Areas and updated list of BEAD-eligible unserved and underserved BSLs on the FloridaCommerce BEAD Deployment webpage on July 8, 2025.

On July 11, 2025, the Office updated and released the <u>BEAD Project Areas Dashboard</u>, featuring the finalized unserved and underserved BSLs. This update provided Applicants with the most current data available to assess the project areas and accurately complete their applications.

### 3. Application Window Opens Within Portal

On mid-day July 14, 2025, the application window opened within the <u>FloridaCommerce Broadband Grant Portal</u> following NTIA's approval of the revised Initial Proposal corrections letter. The application window remained open until 5:00 p.m. (EST) on August 4, 2025, a duration of a 21-day period enabling participation for a wide variety of Applicants. On July 23, 2025, the Office published an updated list of eligible BSLs. The revised list excluded locations to be served by Alachua County through a contract with an ISP using American Rescue Plan Act funding.

Applicants were required to submit a separate application for each project area they intended to serve. In the case that a single subgrantee submitted applications for more than one project area, the subgrantee was required to submit a unique application for each area, though much of the general background content from one application could be used across multiple applications.

Additionally, the Office published an Application Guidance which outlined the steps and requirements that the Office will follow in administering the ConnectedFlorida BEAD Deployment Program. The document provided Applicants with the necessary information and required documentation to apply to the program, in accordance with the BEAD Notice of Funding Opportunity (NOFO), the Office's Initial Proposal Volume I & II, and the NTIA BEAD Restructuring Policy Notice. Additionally, the guidance identified which projects were eligible for the program that met both of Florida's program requirements and the specifications set by NTIA.

### 4. Close Application Window and Review All Applications

At 5:00 p.m. (EST) on August 4, 2025, the application window closed. The Office received 1,065 applications in total. The Office followed the same procedure utilized throughout the Broadband Opportunity Program and built upon the success of previous broadband deployment programs managed by the Office for reviewing and scoring the applications. The following activities were conducted to review these applications:

Basic Quality Assurance Checks: While it was the responsibility of the Applicants to ensure the
completeness of their applications, the Office conducted initial checks to identify missing or
incomplete sections. When such issues were found, it was at the discretion of the Office to
reject the application or allow the Applicant the opportunity for correction.

- Request for Information (RFI): RFIs were issued to Applicants when a critical portion of their application was missing, specifically on a question that prevented evaluation and scoring.
   Applicants had three (3) business days to respond to any RFIs and provide an updated response or necessary documentation.
- Evaluation and Scoring: Following the basic quality assurance checks and RFIs as needed, the Office assessed projects that met the definition of a Priority Broadband Project first. The definition of Priority Broadband Projects and how the Office applied this definition is described in further details in Section 12. Substantiation of Priority Broadband Projects. Applications were evaluated and scored according to the criteria detailed in Section 13. Subgrantee Selection Certification. The pre-defined criteria standardized comparison across all applications and technology types and guarded against arbitrary decisions or bias in the selection process. The Office hired an independent vendor to serve as the application review team, who were trained using a set of standard operating procedures developed to standardize the review process and ensure consistency. Application evaluations were conducted by a team of reviewers to incorporate a variety of perspectives and were based entirely on the submitted materials, including all required attachments and documentation.

The Office has extensive experience reviewing applications for deployment activities from the Broadband Opportunity and Capital Projects Fund Program application cycles. This experience was leveraged to efficiently review and score submitted applications in line with NTIA guidance. The Office confirmed that nearly all unserved and underserved locations across Florida were claimed at this point in the Subgrantee Selection process, aligning with the BEAD NOFO requirements.

### **Preliminary Selection**

### 5. Preliminary Selection of Subgrantees for Project Areas

To preliminarily select applications, the Office followed the approach described in the BEAD Restructuring Policy Notice and prioritized Priority Broadband Projects over non-Priority Broadband Projects for the same project area. When two or more Priority Broadband Projects (or non-Priority Broadband Projects) competed for the same project area, the Office applied the scoring methodology outlined in Section 13. Subgrantee Selection Certification, to identify the preliminarily selected application.

The definition of Priority Broadband Projects and how the Office applied this definition is described in further details in Section 12. Substantiation of Priority Broadband Projects. If the Office determined that selecting a Priority Broadband Project for the same project would add excessive costs to the program, the Office selected a lower cost non-Priority Broadband Project.

Preliminary selection did not constitute a formal selection or an award as these selections only served as an internal designation pending further review and coordination with NTIA.

### 6. Targeted Outreach for Unclaimed Locations

The Office received at least one application for every project area. As a result, there was no need to solicit bids for entire project areas.

However, some of the highest-scoring applications did not include all unserved or underserved BSLs within their respective project areas. To ensure comprehensive coverage, the Office implemented a targeted outreach process to engage applicants and solicit interest in serving the remaining unclaimed locations.

Following this outreach, meetings were scheduled when the Office deemed necessary or requested by applicants, thus streamlining the process and reducing administrative burden.

### 7. Proceed with Risk Assessment of Preliminary Selected Applicants

In parallel to subgrantee selection, Applicants underwent a risk assessment based on the BEAD NOFO Applicants qualifications (Section IV., D.)<sup>2</sup>. The risk assessment did not have an impact on the scoring and evaluation of an application as the risk assessment was performed after an application was scored, but prior to the award. The purpose of the pre-award risk assessment was to assist the Office in identifying areas of risk in a project application that may need technical assistance to cure prior to award or grant agreement execution. Only the information used to score the application was considered in the risk assessment; no additional information requests were made for purposes of the pre-award risk assessment.

In the pre-award phase, a high-level review was conducted of financial statements, audit history, match funding, project management capacity, and all required plans, including those related to cybersecurity and supply chain risk management in accordance with the National Institute of Standards and Technology (NIST) standards. Subrecipients were required to meet NTIA requirements for financial assurances, such as letters of credit or other approved instruments. While many of the same documents were used, the risk assessment was performed separately from the applicant evaluation for meeting managerial, organizational and financial requirements of the BEAD program, and was not part of the overall project evaluation and scoring.

#### **Provisional Selection**

### 8. Subgrantee Selection Review Meeting with NTIA

On September 24, 2025, the Office met with NTIA for the Special Award Condition (SAC) meeting to review deployment subgrantee selection outcomes following the completion of the Subgrantee Selection Process.

### 9. Submit Final Proposal to NTIA

On October 3, 2025, the Office submitted the Final Proposal after receiving written confirmation from NTIA that the SAC meeting was successfully completed and the 7-day public comment period was conducted.

### 10. Final Grant Award

Upon receiving NTIA's approval for the Final Proposal, the Office will initiate the Grant Agreement execution process with the finally selected subgrantees ("awardees").

In summary, the Office conducted a deployment Subgrantee Selection Process that began with preregistration on May 5, 2025, and will culminate in final grant awards following the approval of the Final Proposal submitted on October 3, 2025. This process featured one competitive round, open from July 14, 2025, to August 4, 2025. The deployment Subgrantee Selection Process was consistent with that approved by NTIA in Volume II of the Initial Proposal and fully aligned with the BEAD NOFO, the BEAD Restructuring Policy Notice, and all NTIA feedback and guidance.

<sup>&</sup>lt;sup>2</sup> The section IV.D.2 Subgrantee Qualifications begins on page 71 of the <u>NTIA Notice of Funding Opportunity</u> detailing the specific capacities and capabilities to carry out the activities of the program.

1.2. Text Box: Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

Throughout the deployment Subgrantee Selection Process for the ConnectedFlorida BEAD Deployment Program, the Office was committed to ensuring that unserved and underserved communities were reached through a process that was fair, open, and competitive. The following describes the steps the Office took to uphold these principles.

To ensure a fair process, the Office:

- Published the scoring rubric prior to and during the application window on the FloridaCommerce BEAD Deployment webpage providing equal access to all Applicants. The scoring rubric was established in advance and communicated to all Applicants through the Application Guidance document, along with key information about the application. The Office described how both primary and secondary scoring criteria would be applied in alignment with the project scoring guidelines detailed in Section 3.4: Scoring Rubrics<sup>3</sup> of the BEAD Restructuring Policy Notice.
- Developed standardized scoring criteria consisting of a point system to objectively and fairly
  assess all applications received. To avoid bias in decision making, applications were evaluated
  by the established primary and secondary scoring criteria outlined in a subsequent section,
  Section 13. Subgrantee Selection Certification. By incorporating a point-based system into the
  secondary scoring criteria, the Office ensured that evaluations remained quantitative,
  promoting consistent and unbiased assessments across all applications.
- Established specialized reviewer teams, each focused on distinct aspects of the application to support objective and qualified evaluation of applications. These teams included, but were not limited to: completeness review, GIS and coverage evaluation, proposed project technology review, Environmental and National Historic Preservation review, financial review, and scoring assessment. Each team was composed of reviewers with relevant expertise and experience in their respective domains. The Office conducted targeted training sessions for each group to ensure reviewers were equipped to apply evaluation criteria consistently, fairly, and in alignment with BEAD program requirements. Scoring was based on objective data and conducted in an automated fashion, eliminating subjectivity from the scoring process. A multilayered quality assurance and quality control (QA/QC) process was implemented across all review teams to validate the accuracy, consistency, and integrity of evaluations prior to finalizing any review outcomes or scores. Additionally, to further maintain transparency and impartiality, reviewers were required to disclose any existing relationships or potential conflicts of interest at the onset of the deployment Subgrantee Selection process.
- Adopted several safeguards to discourage anti-competitive behavior. The Office aimed to
  prevent collusion and anti-competitive practices, including bid suppression, complementary
  bidding, bid rotation, and/or market allocation by developing an expanded list of prospective
  subgrantees, requiring prospective subgrantees to sign and submit a non-collusion affidavit,
  maintaining procurement records (e.g., bid lists, awards, applications, and requesting further
  information concerning prices when further clarification was needed.
- Implemented a pre-registration process enabling the Office to confirm Applicants' eligibility
  and identify concerns that could undermine confidence in the process. On May 5, 2025, the
  Office launched the pre-registration window. Applicants were required to pre-register to apply
  to the program. The purpose of the pre-registration was to confirm Applicants' eligibility, gather

<sup>&</sup>lt;sup>3</sup> The section 3.4 Scoring Rubrics begins on page 11 of the NTIA BEAD Restructuring Policy Notice describing the required criteria Eligible Entities must follow to score applications.

- insights into anticipated participation, and facilitate communication between the Office and Applicants to verify key information before the application window opened.
- Conducted a risk assessment to provide all Applicants with the same opportunity to cure their applications. In parallel to subgrantee selection, Applicants underwent a pre-award risk assessment based on the BEAD NOFO Subgrantee Qualification<sup>4</sup> and the Office's Initial Proposal Volume II. The purpose of the pre-award risk assessment was to assist the Office identify potential areas of risk in an application that may require technical assistance to cure prior to award or grant agreement execution.
- Maintained clear and consistent communication with all Applicants through a variety of activities to promote fairness. First, the Office published key program documents on the BEAD Deployment webpage, including a Frequently Asked Questions document and an Application Guidance document. The Application Guidance provided Applicants with the necessary information and required documentation to apply to the program, in accordance with the BEAD Notice of Funding Opportunity (NOFO), the Office's Initial Proposal Volume I & II, and the NTIA BEAD Restructuring Policy Notice. The application attachments and templates were also posted on the webpage for Applicants to view and prepare effectively. Applicants were advised to thoroughly read through the entire Application Guidance prior to starting project application responses to obtain a clear understanding of the complete scope of application requirements and further details about the process itself. Second, the Office conducted two webinars. The first webinar was held on July 8, 2025 to answer questions related to the application. The second webinar was held on July 14, 2025 to provide an overview and walkthrough of the application and the application system on the FloridaCommerce Broadband Grant Portal. The recordings and presentation slides from both sessions were posted on the webpage for public access. Third, the Office hosted open office hours every Tuesday and Thursday during the application window. The links to the office hours were publicly posted and accessible to any interested entities.

### To ensure an **open** process, the Office:

- Welcomed participation from all eligible participants. In the Application Guidance, the Office emphasized that the ConnectedFlorida BEAD Deployment Program was available to all Internet Service Provider (ISP) types including private entities, private or public electric cooperatives and utilities, public-private partnerships, Florida's federally recognized tribes, local governments, non-profits, and other entities that develop and/or operate broadband networks. Additionally, the Office identified intended Applicants as ISPs, municipalities with authority to provide broadband services, and local government entities with intent to contract an ISP. While these classifications represented the expected Applicant types, the Office clarified that entities falling outside these categories would not be disqualified.
- Provided a 21-day period for all Applicants to apply between the public notice and the deadline.
   On mid-day July 14, 2025, the FloridaCommerce Broadband Grant Portal opened following the revised Initial Proposal corrections letter approved by NTIA and remained open until 5:00 p.m. (EST) on August 4, 2025, a duration of a 21-day period enabling participation from a wide variety of Applicants.
- Communicated timely updates on application-related information through the BEAD
  Deployment Webpage to allow for full transparency. The Office created a "Deployment-Based
  Application Activities" section on the webpage for the purpose of providing updates and
  publishing finalized documents. On July 14, 2025, the Office posted an update on their

<sup>&</sup>lt;sup>4</sup> The section IV.D.2 Subgrantee Qualifications begins on page 71 of the NTIA Notice of Funding Opportunity detailing the specific capacities and capabilities to carry out the activities of the program.

decision to revise the BEAD Challenge Federal Commitment data to incorporate data from the Federal Funding Map, resulting in the removal of 1,812 locations from BEAD eligibility. Additionally, the Office posted another update on July 23, 2025, informing Applicants that the Office was made aware of previously BEAD-eligible BSLs to be served under federal commitments or County contracts and hence, were no longer BEAD eligible.

To ensure a **competitive** process, the Office:

- Encouraged participation of different types of providers. A diverse range of provider types fostered a free-market environment that increased competition and resulted in a wider array of technologies and implementation strategies, cost efficiency, and broader coverage.
- Engaged in provider-specific outreach only after applications were submitted and the application window was closed. If any BSLs were not included in the highest scoring application for a given project area, the Office contacted existing providers and/or potential awardees of adjacent areas and discussed the expansion of existing coverage to areas that remain uncovered to achieve 100% connectivity.
- Communicated and applied the deconfliction process transparently and fairly. Applicants were required to submit separate applications for each project area they intended to serve. This structure allowed the Office to evaluate each project area independently and identify overlapping and competing applications. In addition, the Office followed the approach described in the BEAD Restructuring Policy Notice and prioritized Priority Broadband Projects over non-Priority Broadband Projects for the same project area. Lastly, the deconfliction process was integrated into the scoring of applications to support efficient evaluations. When comparing competing applications, the Office assessed the Requested BEAD Subsidy per Location (i.e., the total Requested BEAD subsidy that will be 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 proposed match. If a competing application had a Requested BEAD Subsidy per Location greater than 15% of the lowest-cost application received for the same project area, the lowest cost application was provisionally awarded the overlapping project area. If a competing application had a Requested BEAD Subsidy per Location within 15% of the lowest-cost project application received for the same project area, the Office evaluated such competing applications based on the total score of the Secondary Criteria. The Office reviewed preliminarily selected applications and the combination of applications with the lowest overall cost to the program during the deconfliction

Through a combination of safeguards, transparent communication, and structured evaluation practices, the Office implemented the necessary steps to ensure that the deployment Subgrantee Selection process was fair, open, and competitive. These efforts protected the program from bias, collusion, arbitrary decisions, and any other factors that could undermine the process, but most importantly maximized the reach and impact of the BEAD funds.

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

Not applicable. The Office has received at least one application for each project area.

1.4. Text Box: If applicable, describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

Not Applicable. The Office required Applicants to include only unserved and underserved BSLs, not CAIs in their applications. Refer to *Final Proposal Data Submission Question 0.5* for additional information regarding CAIs.

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.

# Requirement 3: Timeline for Implementation

3.1. Text Box: Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the 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.

The Office has implemented various measures across the program lifecycle, from pre-award through monitoring and compliance and closeout, to ensure that each subgrantee meets the required timeline for implementation.

### **Pre-Award Measures**

To ensure timely and effective implementation of the ConnectedFlorida BEAD Deployment Program, the Office required Applicants to provide the following information as part of their submission:

- Project Schedule: Applicants were required to submit a project schedule in the format determined and outlined in the application that is detailed, structured, clear, and evidences a complete build-out and the initiation of service within four years of the date on which the subgrantee receives the subgrant. In addition to the schedule, Applicants had to include a detailed narrative on the project schedule and a mitigation plan that identified key execution risks. For example, Applicants were required to highlight key milestones and the numbers of months needed between signing the grant agreement and the delivery of service to the last eligible BSL included in the Project Area. Each Applicant also needed to identify the start month and duration (in months) for each of the predefined phases:
  - Planning/Detailed Engineering
  - Permitting/Make Ready
  - Material & Equipment Procurement
  - Network Deployment (Construction)
  - Subscriber Activations
  - Program Closeout Submission
- Capital Investment Schedule: Applicants were required to demonstrate that they will achieve complete build-out and service initiation within four years of the final award in their capital investment schedule as part of the Project Financial workbook requested.

Furthermore, speed to deployment was a scoring criterion where applications were assessed based on the Applicants' commitment to providing service no later than four years after the date on which the subgrantee receives the subgrant from the Office or by an earlier date. Scoring was on a sliding scale based on the number of months to complete the proposed project in the project schedule. Applicants received a point for every month less than the 48-month period of performance. For example, projects that proposed to begin delivering service in more than 47 months received no points. If a project proposed to begin delivering service in 47 months they received one point. If a project proposed to begin delivering service in 30 months, they received 18 points and so on for a maximum of 48 points. By incorporating speed to deployment into the scoring criteria, as required by

the BEAD NOFO<sup>5</sup>, the Office encouraged Applicants to expediate their implementation, helping ensure that service would be delivered to unserved and underserved sooner and within the required timeline.

These pre-award measures enabled the Office to evaluate the Applicants' ability to meet the required timeline for implementation, and confirm that, if selected, the Applicant would adhere to the proposed schedule and deadlines.

### **Grant Agreement and Terms and Conditions**

Upon receiving NTIA's approval for its Final Proposal, the Office will initiate the Grant Agreement execution process with the finally selected subgrantees ("awardees"). The Grant Agreement will, among other things, contain terms and conditions related to the description of the services, roles and responsibilities, period of performance, compliance requirements, remedies for noncompliance including but not limited to return of funds, and other terms required by Federal law. The Grant Agreement will hold the subgrantees accountable to meet the timelines for implementation for providing services to customers and completing all BEAD subgrant activities.

#### **Clawback Provisions**

The grant agreements include clear penalties for non-performance, including clawback provisions to recoup disbursed funds if a subgrantee fails to continue to adhere to the obligations established in the grant agreement. If a subgrantee is non-compliant with any provision of the grant agreement or applicable law, or if the Office imposes financial consequences on the subgrantee pursuant to the terms of the grant agreement, the Office has the right to recoup all resulting cost, monetary loss, and/or funds owed to the Office, FloridaCommerce, or the State of Florida.

Subgrantees that fail to meet expectations, such as refusal to submit progress or financial reports, shall forfeit any awarded funds, up to the entire amount received through the program.

### **Termination for Cause**

The Office may terminate the grant agreement if the subgrantee fails to deliver the services within the timelines for implementation or to maintain adequate progress, thus endangering the performance of the grant agreement. The subgrantee will be given 30 calendar days from the termination notification to cure any perceived defect to the satisfaction of the Office.

### Monitoring and Reporting Measures

The Office will implement several accountability measures outlined below, to maintain oversight of subgrantee performance and ensure timely project execution. By closely monitoring progress against the proposed schedules and deadlines, the Office can identify any delays or barriers that may impact compliance and take corrective actions as needed. These measures help confirm that each project remains on track and is completed within the required timelines for implementation.

• Disbursement of Funding: Upon final execution of the subgrant agreement, funding will be distributed based on provider certification and the Office's verification at predetermined thresholds of completion. The Office will evaluate project progress to reimburse funds at 10%, 30%, 50%, and 85% completion, with the final 100% of funding provided only after verification of deployment to all eligible locations within the timeline for implementation. In short, the Office of Broadband will disburse funds tied to verified milestones for completed deployments that comply with the terms included in the successful application and will withhold funds for failure to do so. Subgrantees must provide financial and programmatic progress of BEAD-

<sup>&</sup>lt;sup>5</sup> Speed to deployment as a criteria for scoring is explained in further detail on pages 43 and 45 of the NTIA BEAD Notice of Funding Opportunity.

funded projects, noting any discrepancies from plans, and submit it to the Office for review and ultimate approval.

- Monitoring and Reporting: The Office will conduct the following compliance activities, providing firsthand insights into the Project's status, challenges, and overall performance:
  - On-Site Inspections: To validate and document Project advancement, the Office will perform regular on-site inspections.
  - Desktop Monitoring: The Office will undertake remote evaluations of the Project progress and finances on a regular basis.
  - Compliance Monitoring: The Office will carry out regular compliance monitoring to confirm Awardee adherence to 2 CFR 200 (Code of Federal Regulations) standards, internal controls, proper fiscal management procedures and the ongoing Project management plan.
  - Concluding Financial Review: After the Project's conclusion, the Office will execute a final financial review to ensure that the Project's finances are in order.

Compliance with these monitoring activities is a requirement of federal grant funds. Awardees should be prepared to facilitate these compliance activities, as they are essential to maintaining program integrity and ensuring the successful implementation of the FloridaCommerce BEAD Deployment Program.

### **Closeout Requirements**

No later than 60 calendar days after project completion, or after the grant agreement is terminated, the subgrantee must provide copies of all remaining invoices, submit documentation of completed work, and submit a final monthly report in accordance with the monitoring and reporting requirements set forth in the grant agreement.

By implementing these measures, the Office has reinforced its commitment to timely subgrantee performance and completion of program activities prior to the period of performance end date of the award. These efforts not only support compliance with the timelines for implementation, but also promote transparency, accountability, and the delivery of high-quality services to unserved and underserved communities.

# Requirement 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.

### See Attachments E and F.

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, 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.

# **Requirement 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.

On September 26, 2025, the Office opened the public comment period for the BEAD Final Proposal and remained open for a 7-day period until October 2, 2025. As of October 2, 2025, the Office received a total of [insert # here] public comments.



# Requirement 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. Text Box: Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.

### BEAD Program Deployment | Florida Office of Broadband

On July 8, 2025, the Office publicly posted the finalized BEAD Project Areas, eligible underserved locations, and eligible unserved locations as CSV files which were GIS compatible file formats for Applicants to view within their own environments. Following the publication of these files, the Office also released the BEAD Project Area Dashboard on July 11, 2025, to achieve the goal of serving all unserved and underserved locations in Florida.



### Requirement 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 in the NTIA-approved final list of eligible locations and 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.

Not Applicable. Applicants were required to categorize eligible BSLs in the Project Area into three categories: Locations to Serve, Outlier Locations, and Excluded Locations<sup>6</sup>. Outlier Locations were BSLs within the Project Area that the Applicant identified as excessively high cost (or would otherwise make the project economically unviable for the technology being used) or challenging to serve. These locations were not part of the application and were not included in the Applicant's overall project budget. However, the Applicant could add these locations to their application during the negotiation phase if mutually agreed upon with the Office. If an Applicant proposed to serve an Outlier Location, they were required to complete an attachment with the per BSL cost to serve that location. Unless BSLs were explicitly identified in the attachment as Outlier Locations or Excluded Locations, Applicants were required to serve all eligible BSLs within each proposed Project Area (i.e., "Locations to Serve").

The Office did not have a case where an unserved location was not served because it was either financially incapable or the cost to serve the location would be unreasonably excessive.

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. Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

Yes.

7.5. 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.

Not Applicable. Applicants were required to categorize eligible BSLs in the Project Area into three categories: Locations to Serve, Outlier Locations, and Excluded Locations. Outlier Locations were BSLs within the Project Area that the Applicant identified as excessively high cost (or would otherwise make the project economically unviable for the technology being used) or challenging to serve. These locations were not part of the application and were not included in the Applicant's overall project budget. However, the Applicant could add these locations to their application during the negotiation phase if mutually agreed upon with the Office. If an Applicant proposed to serve an Outlier Location, they were required to complete an attachment with the per BSL cost to serve that location. Unless BSLs were explicitly identified in the attachment as Outlier Locations or Excluded Locations, Applicants were required to serve all eligible BSLs within each proposed Project Area (i.e., "Locations to Serve").

<sup>&</sup>lt;sup>6</sup> Definitions for each category are as follows:

The Office did not have a case where an underserved location was not served because it was either financially incapable or the cost to serve the location would be unreasonably excessive.

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. 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 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. 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.

# Requirement 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.

Through its experience managing over \$600 million in broadband deployment grants, the Office has witnessed the common barriers and costs to deployment. Many of these obstacles and barriers were identified in Florida's BEAD Five-Year Action Plan<sup>7</sup>, including a lack of coordination between utility assets and broadband deployment opportunities, poor coordination between infrastructure installation projects, and others involving inadequate data. The Office explored ways to support subgrantees through the duration of the ConnectedFlorida BEAD Deployment Program. The following six areas outline the ways in which the Office supported cost and barrier reduction through the duration of the program.

### 1. Legislative Changes

### Implementation Status: Complete

In 2023, the state of Florida passed House Bill 1221: Broadband Internet Service Providers, which specifies that the Public Service Commission (PSC) can regulate the poles of rural electric cooperatives that provide broadband. It also allows the PSC to access the books and records of these cooperatives for specific purposes.

### 2. Promotion of 811 Program

### Implementation Status: In Progress

While there are no dig-once policies in Florida, nor any plans to codify a statewide dig-once policy, there is a dedicated 811 program, "Sunshine 811," in the state. This is a free service which aims to avoid damage to buried utilities and encourage safe and coordinated excavations. Sunshine 811 will notify its member utility companies so that they can mark their lines, pipes, and cables. As identified in the Florida Strategic Plan for Broadband, the Office regularly engages with state agencies such as the Florida Department of Transportation for best practices and methods in planning infrastructure construction projects which co-locate resources, utilities, or services. It also coordinates to disseminate this information to all interested parties, make it available by request, or conveniently publish online. Further, the Office regularly provides information through toolkits, outreach, and website available about the use of dig-once policies, including in the Broadband Planning Toolkit available for LTPTs and other broadband actors in the state.

### 3. Promoting the Use of Existing Infrastructure

### Implementation Status: Complete

The use of existing infrastructure can both expedite deployment and reduce overall project costs. The Office incorporated a part of the scoring criteria to acknowledge and incentivize the use of existing infrastructure in BEAD deployment efforts.

### 4. Soliciting Feedback from Providers

Implementation Status: In Progress

Florida's BEAD Five-Year Action Plan can be viewed at the following link: florida-commerce—bead-five-year-action-plan.pdf.

ISPs in Florida offer a breadth and depth of experience when it comes to managing around and through obstacles to broadband deployment. The Office is proud of the relationships fostered and intends to build on those strong connections as it looks ahead to the ConnectedFlorida BEAD Deployment Program. For example, the Office will increase touchpoints with Florida Department of Transportation to look for chances to leverage existing permitting.

### 5. Streamlining Permitting

### Implementation Status: In Progress

The Office plans to closely monitor existing permitting processes in the state and will adjust its course where needed. The Office will track permitting as awards are awarded to subgrantees in order to identify and address delays or issues.

### 6. Soliciting Feedback from LTPTs

### Implementation Status: In Progress

Local Technology Planning Teams (LTPT) are a unique feature of the broadband ecosystem in Florida. As statutorily created county-level teams (67 in total) devoted to technology and broadband planning for communities, LTPTs offer a key point of view when it comes to expanding deployment, adoption, and use across the state<sup>8</sup>. The Office will continue to rely on LTPTs for their insights and feedback through the program. The Office meets with LTPTs on a monthly basis and will continue this cadence in addition to ad hoc conversations that arise. As deployment ramps up, touchpoints will focus increasingly on identifying and mitigating costs and barriers. In addition to these steps, the Office is working to promote the training and enhancement of Florida's workforce so that deployment projects are completed efficiently and effectively.

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.

Not Applicable.

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

Not Applicable.

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

Yes.

<sup>8</sup> Fla. Stat. § 288.9961(4)(b)

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.

Not Applicable.



## Requirement 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.

In accordance with the Infrastructure Investment and Jobs Act of 2021 (IIJA) and the BEAD Restructuring Policy Notice, the Office assessed and preliminarily selected projects that met the definition of a Priority Broadband Project first.

As defined in the BEAD Restructuring Policy Notice issued on June 6, 2025, a Priority Broadband Project must<sup>9</sup>:

- 1. Provide broadband service at speeds of no less than 100/20 Mbps, with latency less than or equal to 100 milliseconds.
- 2. Be able to easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies.

Additionally, NTIA's FAQ Version 13<sup>10</sup> provides guidance on what states should consider when assessing Priority Broadband Projects, and the Office's Priority Broadband Projects assessment was aligned with that guidance.

However, the Office welcomed Applicants to submit Non-Priority Broadband Projects in the same round of applications, as the Office aimed to achieve 100% connectivity through the ConnectedFlorida BEAD Deployment Program. The term "Non-Priority Broadband Project" was defined as a project that would offer service at or above 100/20 Mbps and latency less than or equal to 100 milliseconds but could not necessarily meet the statutory scalability requirements in 47 U.S.C. §1702(a)(2)(I)(ii).

For applications covering the same project area, the Office prioritized Priority Broadband Projects over non-Priority Broadband Projects. If the Office determined that no proposal met the definition of a Priority Broadband Project for a given project area, the Office preliminarily selected a Non-Priority Broadband Project that met the speed and latency requirements of the statute and NOFO for award. This approach aligned with the guidance provided in the BEAD Restructuring Policy Notice.

While the Office allowed applicants to designate whether their applications should be considered as Priority or Non-Priority Broadband Projects, it established clear assessment criteria and a consistent approach for evaluating Priority Broadband Projects under the BEAD program. The assessment was applied to each project area and individual project. By establishing clear and consistent evaluation standards, the Office aimed to ensure transparency and fairness in project selection to prioritize projects that best fulfilled state and federal connectivity mandates.

### **Evaluation Criteria**

The Office considered four evaluation criteria when assessing which specific projects qualified as a Priority Broadband Project for a given project area.

### 1. Project Area Density

The Office assessed project areas in advance of receiving applications to determine which areas required technology capable of serving densely populated regions. This proactive assessment guided the determination of what was considered a Priority Broadband Project for those project areas deemed high density.

<sup>&</sup>lt;sup>9</sup> Broadband Equity, Access, and Deployment (BEAD) Program: BEAD Restructuring Policy Notice, NTIA, June 6, 2025, available here.

<sup>&</sup>lt;sup>10</sup> Frequently Asked Questions and Answers Version 13, NTIA, available here.

The evaluation assessed project areas where eligible BSLs were in close proximity to other BSLs (within a mile radius), identifying potential limitations of certain technologies, in maintaining required service standards.

The analysis also informed that resource allocation aligned with statewide goals, directing investment towards suitable technology solutions that could effectively handle the demands of high-density areas while maintaining service quality.

### 2. Industry Future Connectivity and Scalability Needs

The Office assessed project areas based on the availability and suitability of development sites — particularly for commercial, industrial, or manufacturing use. This analysis identified project areas with increased acreage and/or sites eligible for development. Project areas with a higher percentage of sites and/or acreage were deemed to have higher future connectivity needs and were identified for broadband infrastructure that could support anticipated growth and connectivity demands.

### 3. Speed and Scalability Review

In assessing the technology and scalability of proposed projects, the Office conducted a thorough analysis of the technical specifications and roadmaps presented by each applicant. This review focused on how the proposed infrastructure could meet evolving connectivity needs. The evaluation included examining network designs, speeds, latency performance, and the applicant's plans for scalability to ensure compatibility with future advancements. The analysis followed the FCC's guidance for long-term speed benchmarks and NTIA's BEAD FAQ version 13.

To be considered a Priority Broadband Project, applications were required to demonstrate that they could consistently provide reliable speeds during peak usage hours when network demand is highest. Capacity assessments focused on the average speed provided to active customers during these hours, ensuring that infrastructure was robust enough to accommodate both immediate needs and future technological growth. No project was considered a Priority Broadband Project if service in that project area had been limited by capacity or subject to a capacity surcharge.

The goal of this assessment was to ensure that proposed technologies were not only suitable for current needs but also capable of maintaining service quality and reliability under peak demand conditions, in alignment with statewide broadband goals and the BEAD Restructuring Policy Notice.

Regardless of deployment technology, operators were required to provide a minimum speed tier of 100 Mbps downstream and 20 Mbps upstream, with latency below 100 milliseconds by 2026 and through the period of performance.

### 4. Statewide Capacity

The evaluation of statewide capacity involved considering the project's integration within Florida's broader broadband ecosystem and the applicant's ability to meet Priority Broadband standards across all designated project locations. The Office examined the capacity constraints and potential statewide impacts of the proposal, assessing alignment with existing broadband infrastructure and connectivity needs across the state. The goal was to ensure that projects were designed to contribute positively to Florida's overall broadband objectives by delivering consistent connectivity that addresses both local and statewide requirements.

# Requirement 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 consistently with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

The Office's scoring criteria followed the approach described in the BEAD Restructuring Policy Notice and prioritized Priority Broadband Projects over non-Priority Broadband Projects for the same project area.

The Office implemented the following scoring criteria and respective points when scoring Priority Broadband Project and Non-Priority Broadband Projects submitted by eligible Applicants. These criteria are in accordance with the project scoring guidelines detailed in Section 3.4: Scoring Rubrics of the BEAD Restructuring Policy Notice.

Points were assigned for each category by reviewing the information provided in the application and supporting documentation. To maximize the application's score, Applicants were required to be thorough and comprehensive, with clear and complete responses for all requested information.

### **Primary Scoring Criteria**

### Minimal BEAD Program Outlay: N/A Total Points

When comparing competing applications, the Office assessed the Requested BEAD Subsidy per Location (i.e., the total Requested BEAD subsidy that will be 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 proposed match.

If a competing application had a Requested BEAD Subsidy per Location greater than 15% of the lowest-cost application received for the same project area, the lowest cost application was provisionally awarded the overlapping project area. If a competing application had a Requested BEAD Subsidy per Location within 15% of the lowest-cost project application received for the same project area, the Office evaluated such competing applications based on the total score of the Secondary Criteria.

For example, if two Applicants submit Priority Broadband Project applications for the same project area and have the following details:

- Application A proposes to serve 2,000 BSLs for a total project cost of \$7.0 million and a match
  of \$2.1 million. The Requested BEAD Subsidy per Location will be equal to: (\$7.0million \$2.1million) / 2,000 = \$2,450 / BSL.
- Application B proposes to serve 2,000 BSLs for a total project cost of \$13.0 million and a
  match of \$6.5 million. The Requested BEAD Subsidy per Location will be equal to:
   (\$13.0million \$6.5million) / 2,000 = \$3,250 / BSL.

Given that Application B's Requested BEAD Subsidy per Location is greater than 15% (32.7%) of the lowest-cost application, in this case Application A, the Office provisionally selected application A for the overlapping project area.

Another example, if two Applicants submit Priority Broadband Project applications for the same project area and have the following details:

Application C proposes to serve 2,000 BSLs for a total project cost of \$7.5 million and a match
of \$3.1 million. The Requested BEAD Subsidy per Location will be equal to: (\$7.5million \$3.1million) / 2,000 = \$2,200 / BSL.

Application D proposes to serve 2,000 BSLs for a total project cost of \$7.0 million and a match
of \$2.1 million. The Requested BEAD Subsidy per Location will be equal to: (\$7.0million \$2.1million) / 2,000 = \$2,450 / BSL.

Given that Application C's Requested BEAD Subsidy per Location is within 15% (11.3%) of the lowest-cost application, in this case Application D, the Office reviewed and scored the Secondary Criteria. The application with the highest score for the Secondary Criteria was awarded the overlapping project area.

### Secondary Scoring Criteria

Secondary scoring allows for a total of 100 points to be awarded in the evaluation.

### Speed of Network and Other Technical Capacities: 52 Total Points

The speeds and latencies listed in this scoring criteria are based on the Applicant's proposed use of technologies that exhibit greater ease of scalability with lower future investment. As technologies continue to evolve, the Office seeks to encourage Applicants to adopt solutions that can accommodate future growth and demands, thereby ensuring the long-term sustainability and effectiveness of the funded projects. The graded scale scored applications based on two separate speed criteria:

Minimum guaranteed speeds: Scoring was based on the minimum internet speed that will be
guaranteed to all subscribers within the selected project area. For example, one point was granted
if the Applicant guarantees a minimum speed of 100 Mbps download and 20 Mbps upload. Full
points (26) were awarded if the Applicant can guarantee a minimum speed of 1 Gbps symmetrical.

Table 2: Scoring Values and Points for Minimum Guaranteed Speeds

Scoring Value	Points	
1 Gbps Symmetrical	26	
1,000/500 Down/Up (Mbps)	20	
1,000/100 Down/Up (Mbps)	15	
500/50 Down/Up (Mbps)	10	
200/50 Down/Up (Mbps)	5	
100/20 Down/Up (Mbps)	1	
Other	N/A	

Maximum speeds: The Applicant must specify the maximum possible theoretical internet speed
and latency for the selected project area. This determined the points awarded. No points were
granted if the maximum theoretical latency for all subscribers was 100 Mbps download and 20
Mbps upload. Conversely, full points (26) were awarded if the maximum theoretical speed for all
subscribers reaches 1 Gbps symmetrical and a maximum latency of no more than 50 milliseconds.

Table 3: Scoring Values and Points for Maximum Speeds

Scoring Value	Points
1 Gbps Symmetrical with latency <50ms	26
1 Gbps Symmetrical with latency 50ms but <100ms	20
1,000/500 Down/Up (Mbps) with latency <50ms	16
1,000/500 Down/Up (Mbps) with latency 50ms but <100ms	14

1,000/100 Down/Up (Mbps) with latency <50ms	12
1,000/100 Down/Up (Mbps) with latency 50ms but <100ms	10
500/50 Down/Up (Mbps) with latency <50ms	8
500/50 Down/Up (Mbps) with latency 50ms but <100ms	6
200/50 Down/Up (Mbps) with latency <50ms	4
200/50 Down/Up (Mbps) with latency 50ms but <100ms	2
100/20 Down/Up (Mbps)	0
Other	N/A

### Speed to Deployment: 48 Total Points

All recipients of the ConnectedFlorida BEAD Deployment Program funds designated for network deployment are required to execute the planned broadband network and commence delivering services to all subscribers seeking broadband services within the application project area(s) no later than four years after the date on which the subgrantee will receive the subgrant from the Office. The Office assessed applications based on the Applicants' commitment to providing service by an earlier date. Scoring was on a sliding scale based on number of months to complete the proposed project in the project schedule. Applicants received a point for every month less than the 48 month period of performance. For example, projects that propose to begin delivering service in more than 47 months received no points. If a project proposes to begin delivering service in 47 months, they received 1 point. If a project proposes to begin delivering service in 30 months, they received 18 points, and so on.

# Requirement 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/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.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 consistently with the prioritization framework laid out in Section 3.4 of the BEAD
    Restructuring Policy Notice.

See Attachments G and H.

## Requirement 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.

The state of Florida has two federally recognized tribes – the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida.

On July 23, 2025, the Office of Broadband informed NTIA that the Seminole Tribe had elected not to participate in the BEAD Program. The message sent to NTIA informing them of the Tribe's intent is found below:

Mr. Nathan,

The FloridaCommerce Office of Broadband is writing to notify the NTIA that the Seminole Tribe of Florida has informed our office that they have elected not to participate in the BEAD program.

The Seminole Tribe of Florida reason for not pursuing BEAD funding is attributed to the short turn-around time of the application window. In our conversations, the Tribe has indicated that they would not allow outside service providers to bid for locations on Tribal lands, meaning that all unserved and underserved Tribal locations would remain that way.

If, in the future, there are excess BEAD program funds after the initial window closes, the Office requests the opportunity to revisit the conversation with the Tribe and operate a separate grant window with an adjusted timeline.

See Attachment I for the Resolution of Consent from the Seminole Tribe of Florida.

See Attachment J for the Resolution of Consent from the Miccosukee Tribe of Indians of Florida.

# Requirement 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.



### **Waivers**

17.1. Text Box: If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note 'Not applicable.

Not Applicable.

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.

Not Applicable.



# **Attachments**

Attachment A - Subgrantees CSV File

Attachment B - Deployment Projects CSV File

Attachment C - Locations CSV File

Attachment D - No BEAD Locations CSV File

Attachment E - BEAD Program Monitoring Plan

Attachment F – Policy Documentation = Per discussion with FPO, not applicable.

Attachment G – Environmental and Historic Preservation (EHP) Documentation

Attachment H - FirstNet Regional Programmatic Environmental Impact Statement (PEIS) Memo

Attachment I - Decline of Participation in BEAD Program from the Seminole Tribe of Florida

Attachment J – Decline of Participation in BEAD Program from the Miccosukee Tribe of Indians of Florida = Per discussion with the Miccosukee Tribe of Indians of Florida, participation in the BEAD program is declined due to receipt of sufficient broadband funding via the Broadband Opportunity Program (ARPA) program.