
Indiana BEAD Final Proposal

Draft for Public Comment
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State of Indiana
Indiana Broadband Office



Indiana BEAD Final Proposal

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Final Proposal Data Attachments

0.1 Subgrantees CSV File

NTIA Guidance: Complete and submit the Subgrantees CSV file (named “fp_subgrantees.csv”) using the NTIA template provided.

Please see the file titled fp_subgrantees.csv.

0.2 Deployment Projects CSV File

NTIA Guidance: Complete and submit the Deployment Projects CSV file (named “fp_deployment_projects.csv”) using the NTIA template provided.

Please see the file titled fp_deployment_projects.csv.

0.3 Locations CSV File

NTIA Guidance: Complete and submit the Locations CSV file (named “fp_locations.csv”) using the NTIA template provided. This list must match the approved final list from the Eligible Entity’s Challenge Process results.

Please see the file titled fp_locations.csv.

0.4 No BEAD Locations CSV File

NTIA Guidance: 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).

Please see the file titled fp_no_BEAD_locations.csv.

0.5 Intent to Utilize BEAD Funds to Serve CAIs

NTIA Guidance: 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 upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2)?

Yes.

0.6 CAIs CSV File

NTIA Guidance: 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.

Please see the file titled fp_cai.csv.

Subgrantee Selection Process Outcomes (Requirement 1)

1.1 Consistency with Initial Proposal Volume II

NTIA Guidance: 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 Indiana Broadband Office (IBO) conducted its Subgrantee Selection Process in accordance with the framework approved by the National Telecommunications and Information Administration (NTIA) in Volume II of the Initial Proposal, as subsequently modified by the June 2025 BEAD Restructuring Policy Notice (RPN). Indiana designed a competitive, transparent, and open subgrantee selection process with a technology-neutral approach to achieve complete coverage of eligible unserved and underserved broadband serviceable locations (BSLs) across the state.

Upon announcement of the RPN, the IBO incorporated all updated guidance, including the revised award prioritization structure and secondary scoring criteria, into the applicable sections of Indiana's BEAD Subgrantee Selection Process. As stipulated by the RPN, the IBO retained all statutory requirements contained in the BEAD Notice of Funding Opportunity (NOFO), as established by the Infrastructure and Jobs Act of 2021, and eliminated all non-statutory requirements regarding:

- Labor, employment, and workforce development,
- Climate change,
- Open access and net neutrality,
- Non-traditional broadband provider stipulations.
- Middle class affordability plans, and
- Low-cost service options.

To implement the Benefit of the Bargain Round as stipulated in the RPN, the IBO first took steps to investigate Indiana's approved list of BEAD-eligible locations and community anchor institutions (CAIs) to identify BSLs that no longer required BEAD funding. IBO staff followed the reason code process described in the RPN and outlined in the Final Proposal Guidance, ensuring the optimization of BEAD funding by removing from eligibility locations that had been connected to service since the Challenge Process took place. Approximately 12,000 locations were identified during this process, including those served by private buildouts, those subject to an enforceable commitment, and those that no longer existed in Version 6 of the FCC Fabric data.

Simultaneously, the IBO completed steps to remove any BEAD-eligible locations considered served with unlicensed fixed wireless (ULFW) technology. First, the IBO identified potential BSLs in the state that were served by ULFW service that also met the minimum requirements of the BEAD program. Then, the IBO publicly posted on its website that ULFW providers had seven days to respond with intent to submit evidence of their service footprint for evaluation. Several ULFW providers reached out to the IBO during the intent window. An additional seven days were given to these ULFW providers to present evidence about any BEAD-eligible locations in their service territory. The

evidence window resulted in several hundred locations being removed from Indiana's list of BEAD-eligible locations. Through these efforts, Indiana's list of BEAD-eligible locations was reduced by over 9%, thereby directing taxpayer funds more effectively to locations that truly need broadband service. An updated list of eligible locations was posted on the IBO's website immediately after these processes were completed.

Prior to opening the Benefit of the Bargain Round of subgrantee selection, the IBO also reopened its pre-qualification process, which ran from June 20 to July 21, 2025. This window enabled providers who could not previously apply or were denied pre-qualified status to apply for the Benefit of the Bargain Round, ultimately yielding five additional eligible internet service providers.

During the first week of July, the IBO drafted and made publicly available the pre-determined project areas available for bidding. These polygon shapes were comprised of Census blocks, and every eligible BSL in the included Census blocks made up the project areas. Project areas were designed in a two-fold manner. The first type was based on the previously preliminarily awarded projects selected in Indiana's initial round of subgrantee selection, as allowable by the RPN. These project areas accounted for 450 out of 1,264 total project areas. The remaining project area design was based on geographical and topographical factors, with the intention to promote a fair, open, and competitive bid process. This approach ensured that Indiana constituents would, where possible, benefit from multiple provider applicants with varying technology options. All providers were allowed and encouraged to bid on as many or as few project areas as desired, regardless of whether a project had a previous winner associated with it.

Internet service providers were required to submit documentation on a project-by-project basis during the application process to be considered for a BEAD award. In other words, if a provider organization wanted to bid on 10 project areas, 10 individual applications demonstrating the organization's ability to carry out a deployment in each specific area were required. This process was crucial, as it captured detailed technical information, the applicant's ability to meet statutory performance requirements, deployment timelines, and financial data documenting total project cost, subsidy request, and match contributions.

Indiana's Benefit of the Bargain application window was open from July 10 to July 21, 2025, and the IBO received 3,529 applications from 36 providers. These numbers represented an increase from the initial round of subgrantee selection, which had seen 743 applications from 27 provider organizations. In Indiana's Volume II, the scoring framework weighted points across multiple criteria, including technical design, affordability commitments, workforce considerations, and minimal BEAD outlay. While this structure reflected the priorities at the time, the release of the Restructuring Policy Notice brought simplicity to the evaluation process. In alignment with the updated framework, Indiana transitioned from a points-based system to a cost-first approach, making the amount of BEAD funding per location the primary basis for selection. Secondary factors, such as speed-to-deployment commitments, technical performance, and recognition of previously preliminarily awarded applications, were considered only when competing proposals fell within fifteen percent of the lowest-cost application.

By conducting the Benefit of the Bargain Round in alignment with the Restructuring Policy Notice, the Indiana Broadband Office achieved significant savings for Indiana's BEAD Program. Re-competition under the updated cost framework prompted providers to refine their proposals, resulting in lower subsidy requests and a more efficient use of BEAD funds across project areas. Applicants were incentivized to minimize BEAD outlay while still maintaining strong commitments to performance and deployment timelines. As a result, Indiana preserved approximately \$215 million BEAD dollars, reducing the overall cost of connecting unserved and underserved residents, and demonstrated that a transparent, competitive process could expand coverage and maximize the impact of available federal funding.

1.2 Fair, Open, and Competitive Subgrantee Selection Process

NTIA Guidance: 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.

Indiana's deployment subgrantee selection process was structured to be fair, open, and competitive for all participants regardless of technology type.

To achieve a fair process, the IBO took deliberate steps to eliminate barriers to participation. Ahead of the application window, all applicants received the same information, and during the process, all applications were held to the same standards and reviewed against identical criteria. Application questions were publicly posted and accessible to all providers, and scoring guidance was made available in advance to ensure clarity in evaluation. Technical assistance was widely offered, including webinars and one-on-one support sessions, to enable providers of all sizes and experience levels to engage effectively. The IBO trained all reviewers on both program rules and the use of standardized scoring tools, provided a written scoring guide, and documented that no reviewer had conflicts of interest. Every application was scored against the same criteria, regardless of provider type, technology, or size of operation.

Openness was demonstrated in the inclusive design of Indiana's process. The IBO placed no restrictions on the types of providers who could participate, including fiber, cable, fixed wireless, and satellite; applicants were all eligible to apply if they met the statutory program requirements. Similarly, pre-qualification was open to all interested entities and was conducted under the same terms for every applicant. Guidance documents, scoring rubrics, and timelines were posted publicly and distributed directly to an extensive contact list of provider organizations. Additionally, the IBO hosted a webinar and provided clear notification of key dates, ensuring every provider had equal access to training and information. The webinar and accompanying slides were then posted to the IBO website in a timely fashion. In short, all information was publicly available, and IBO staff were readily reachable and responsive to internet service providers interested in participating.

The IBO fostered competition by structuring the subgrantee selection process to encourage broad participation and to ensure that the most efficient and effective projects were selected. All provider types were invited and encouraged to submit applications, with targeted outreach used to maximize participation. Guidance and application

materials were written to be technology-neutral and accessible to both large, established providers and smaller, emerging ISPs. Ultimately, the process yielded a diverse mix of applicants representing many types of broadband technology. The scoring system was clear, uniform, and transparent, ensuring project proposals would be evaluated consistently and objectively.

By eliminating barriers to participation, providing equal access to information and assistance, and applying a transparent and consistent scoring framework, IBO upheld the commitments outlined in Volume II while aligning its practices with the updated federal framework.

1.3 Application Process

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

Where no application was received, the Indiana Broadband Office followed a procedure consistent with the process approved in its Initial Proposal Volume II. After the Benefit of the Bargain Round concluded, the IBO undertook a negotiation cycle that prioritized priority broadband projects and offered internet service providers with service and awards near the remaining project areas an opportunity to provide a bid. This process was conducted in alignment with Indiana's Initial Proposal and the Restructuring Policy Notice.

1.4 Methodology for Eligible CAI List

NTIA Guidance: 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.

The Indiana Broadband Office consulted with its Federal Program Officer to evaluate its eligible CAI list ahead of the Benefit of the Bargain round. The IBO initially defined CAIs in a limited manner in its Volume 2, and therefore, only five CAIs were removed from the

eligible list to conform with the BEAD Restructuring Policy Notice. The eliminated CAls were:

- Clay City Senior Citizens Housing
- Crawford Manor Retirement Community
- Logansport WorkOne Express
- St. Paul Senior Citizens
- Silver Birch of Evansville

1.5 Retention of Records

NTIA Guidance: 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 Page | 21 and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

Yes.

Timeline for Implementation (Requirement 3)

3.1 Subgrantee Deployment Compliance

NTIA Guidance: Has the Eligible Entity taken measures to: (a) ensure that each subgrantees will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (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 Indiana Broadband Office has established requirements and oversight mechanisms to ensure that all BEAD subgrantees will meet deployment and completion obligations in accordance with federal guidance. These requirements are clearly outlined in the draft subgrant agreement, which includes binding provisions requiring providers to begin offering service to every customer in their project areas within four years of receiving an award. These contractual commitments are reinforced through milestone reporting (fixed amount subawards, or FASAs), defined consequences for non-compliance, and monitoring activities that enable the IBO to track progress throughout the period of performance. The IBO is confident in its assessment of each applicant's ability to deploy broadband network facilities via Indiana's application process, where subgrantees were required to provide extensive documentation on the minimum requirements and qualifications outlined in the BEAD NOFO.

To comply with 2 C.F.R. 200.344, IBO will also require all deployment activities to be scheduled for completion at least 120 days prior to the end of Indiana's award period. This structure serves as a buffer for closeout activities, financial reconciliation, and the resolution of any compliance issues. As part of the application process, providers were required to submit deployment schedules that demonstrate their ability to meet this timeline, and IBO will continue to review and validate these schedules throughout project implementation.

Additionally, the IBO has created a monitoring plan to ensure accountability for subgrantees. Subgrantees will be required to submit quarterly progress reports, documenting construction milestones, expenditure of funds, and updated deployment schedules. IBO staff will review these reports for accuracy and consistency, flagging discrepancies for follow-up. The office will also conduct periodic site visits and desk audits to verify reported progress against actual field conditions, providing an additional layer of assurance that deployments are proceeding on schedule. Where concerns arise, the IBO will take corrective action and work directly with subgrantees to resolve issues promptly.

Finally, the IBO is committed to completing all programmatic BEAD activities by the end of the state's award period, in accordance with 2 C.F.R. 200.344. This includes administrative oversight, data reporting, and compliance monitoring. By maintaining the

monitoring principles established in Volume II, in alignment with the Restructuring Policy Notice, the IBO will ensure that subgrantees deliver reliable service to Indiana residents on time and that all BEAD-funded activities are completed within the federally prescribed performance window.

Oversight and Accountability Processes (Requirement 4)

4.1 Public Waste, Fraud, and Abuse Hotline

NTIA Guidance: 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. The Indiana Broadband Office has a public hotline for reporting waste, fraud, and abuse, which can be reached at IBOFraudHotline@iot.in.gov. This email address is publicized on the Indiana Broadband Office's website. Additionally, the public can utilize the Indiana statewide hotline to report any concerns relating to the deployment of the BEAD Program. The statewide hotline can be reached through the Indiana Office of Inspector General for which a link is provided on the IBO website.

4.2 BEAD Monitoring and Agency Policy Documentation Plans

NTIA Guidance: 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 Page | 26 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.

Please see the files titled [IN_BEAD_Monitoring_Plan](#) and [IBO Subgrant Agreement](#).

4.3 Certification of Compliance with Subgrant Agreement Conditions

NTIA Guidance: 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.

Local Coordination (Requirement 5)

5.1 Local Coordination Efforts

NTIA Guidance: 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.

A high-level summary of the comments received during the Indiana Broadband Office's public comment period and how they were addressed will be incorporated here before final submission of the Final Proposal to the NTIA.

Challenge Process Results (Requirement 6)

6.1 Completion of BEAD Challenge Process Certification

NTIA Guidance (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 Public Location Classifications

NTIA Guidance: 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 Indiana Broadband Office publicly posted its final location classifications immediately after Challenge Process approval on December 20, 2024. The file of classifications was subsequently updated before the Benefit of the Bargain round began in July 2025. The file can be accessed on the IBO's website: [Indiana Broadband Office Subgrantee Selection Page](#).

Unserved and Underserved Locations (Requirement 7)

7.1 Coverage of Unserved Locations

NTIA Guidance: 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 Financial Incapability or Excessive Cost Determination of Unserved Locations

NTIA Guidance: If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

Not applicable.

7.3 Financial Incapability or Excessive Cost Determination of Unserved Locations Supporting Documentation

NTIA Guidance (Optional, Attachment): 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 Coverage of Underserved Locations

NTIA Guidance: 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 Financial Incapability or Excessive Cost Determination of Underserved Locations

NTIA Guidance: 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.

7.6 Financial Incapability or Excessive Cost Determination of Underserved Locations Supporting Documentation

NTIA Guidance (Optional, Attachment): 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 Certification of Reason Code Utilization

NTIA Guidance: 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 Certification of Accounting for All Enforceable Commitments

NTIA Guidance: 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.

Implementation Status of Plans for Cost and Barrier Reduction (Requirement 11)

11.1 Reducing Costs and Barriers to Deployment

NTIA Guidance: 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.

Steps to Success Promotion – Complete

Indiana's Initial Proposal Volume 2 described the Steps to Success campaign that the Indiana Broadband Office utilized to connect with and inform local government units about broadband development. The campaign comprised ten steps, including encouraging local governments to engage directly with prospective internet service providers and to become a Broadband Ready Community, in which permitting procedures and timelines would be greatly streamlined.

The Indiana Broadband Office promoted the Steps to Success extensively across the state in the lead-up to the Challenge Process and Subgrantee Selection. The campaign reached local leaders in every county in Indiana and resulted in over 87 Broadband Ready Communities. Although the materials from this campaign are still available for reference, the Indiana Broadband Office considers this effort to be complete.

Collaboration with Relevant State Agencies – In Progress

The State of Indiana has funded several state-level broadband expansion programs, including the highly successful NextLevel Connections and Indiana Connectivity Programs. Because of these programs, the Indiana Broadband Office has extensive knowledge of common barriers to deployment and has established lines of communication and collaboration with other state agencies to mitigate these issues. For previous programs, there was extensive collaboration among the administering agency, the Department of Natural Resources (DNR), the Office of Community and Rural Affairs (OCRA), and the Department of Transportation (INDOT) to address National Environmental Policy Act (NEPA) requirements, permitting, and other related issues.

Learning from prior experience, the Indiana Broadband Office has kept DNR, OCRA, and INDOT apprised of all BEAD progress. The IBO currently meets with these agencies at least quarterly to ensure all parties are aware of upcoming timelines. This frequency will increase substantially as BEAD contracts are finalized. To further enhance communication, the IBO has a dedicated staff member designated as a permitting liaison. This individual is responsible for coordinating responses across the state agencies and working directly with internet service providers, utilities, and other relevant entities. As the bulk of this work will occur once BEAD awards are finalized, this effort is currently in progress.

Dig Once Program – In Progress

The Indiana Broadband Office will adhere to the Indiana Department of Transportation's (INDOT) dig once program for broadband, as detailed in 105 Indiana Administrative Code Article 16, for all BEAD-funded projects. This program's application to BEAD has been communicated to INDOT, internet service providers, and Indiana 811, a non-profit corporation comprised of member operators of underground facilities in Indiana. All parties are aware of the upcoming requirements and are kept up to date on when dig once activities related to BEAD are scheduled to begin. The program and its guidelines have already been clearly established, though adherence to the dig once program will continue throughout subgrantee buildouts. For this reason, the Indiana Broadband Office considers this effort ongoing and in progress.

Consolidating Information and Processes – In Progress

The Indiana Broadband Office has continually striven to aggregate relevant information and processes to ease the burden on internet service providers once BEAD deployment begins. Specifically, the IBO has focused on permitting, pole access, easements, and rights of way information. As mentioned above, the office's permitting liaison will act as a dedicated, single point of contact for internet service providers to find information and ask questions. This staff member will also work with awarded internet service providers to provide pre-submission review of permits and other documentation as needed to prevent common delays based on missing information.

In addition to providing a single point of contact for information and issues, the Indiana Broadband Office supported state legislators' efforts to clarify and refine pole access processes and conflict resolution. Throughout all state-level broadband deployment programs, listening sessions, and direct conversations with internet service providers, pole attachments have been identified as a significant barrier to effective and timely deployment projects. Senate Bill 502, signed by Governor Braun on May 6, 2025, establishes guidelines for pole attachment requests, requires timely responses from the pole owner, outlines agreement timelines, and establishes rapid response mediation processes in the event of a dispute. The Indiana Broadband Office believes this new framework will speed BEAD deployments and help prevent delays associated with pole attachments.

The IBO and the State of Indiana have made significant progress in establishing processes to reduce barriers to deployment since the completion of the Initial Proposal Volume 2. These efforts will continue as individual projects begin, therefore this portion of the plan is in progress.

11.2 Certification of Compliance with Existing Federal Labor and Employment Laws

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

Yes.

11.3 Workforce Development

NTIA Guidance (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 Low-Cost Broadband Service Option

NTIA Guidance (Y/N): Certify that all subgrantees selected by the Eligible Entity will be required to offer the low-cost broadband service option, as approved by NTIA in the Initial Proposal, for the duration of the 10-year Federal interest period.

Yes.

11.5 Explanation for Subgrantee Low-Cost Broadband Service Exception

NTIA Guidance (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 Certification of Reliability and Resilience of BEAD-Funded Networks

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

Yes.

11.7 Certification of Reliability and Resilience of BEAD-Funded Networks

NTIA Guidance (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.

Substantiation of Priority Broadband Projects (Requirement 12)

12.1 Application of Priority Project Definition Based on the Infrastructure Act and the BEAD Restructuring Policy

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

The Indiana Broadband Office determined the status of a Priority Broadband Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice. For a project to qualify for priority status, the applicant was required to demonstrate, for that specific project area, its ability to:

- Provide broadband service of speeds at least 100 megabits per second download and 20 megabits per second upload,
- Ensure latency less than or equal to 100 milliseconds, and
- Easily scale speeds over time to meet the evolving connectivity needs, and support the deployment of 5G, successor wireless technologies, and other advanced services.

The IBO required applicants to first indicate their desire to be considered a priority broadband project for each individual project area application. Then, the applicant was required to provide documentation to sufficiently demonstrate how their proposed network design would meet the above requirements at the individual project-area level. To ensure providers of all technology types were treated fairly and consistently when assessed for priority status, the Indiana Broadband Office asked the same series of questions to all providers and provided scalability evidence templates for every specific technology type to be uploaded with each application. Each applicant was prompted to provide the following:

- A narrative explaining its plan to meet scalability requirements and illustrating that it can easily scale speeds over time,
- Network designs, specifications, and/or demand forecasts showing projected subscriber growth and busy hour usage by year,
- The technology-specific technical evidence template, and
- Documentation, such as logical network diagrams, headend and backbone configurations, tower or uplink details, performance calculations, and reliability measures, as needed, to demonstrate reliability and scalability.

Technical reviewers then assessed this documentation on each individual project area application where an internet service provider stated its intent to be considered a priority broadband project. This process was intensive, with each application being reviewed against a standard priority broadband project checklist. The checklist evaluated the strength of network diagrams and architecture for redundancy and scalability and, in the case of wireless deployments, whether the documentation accounted for line-of-sight considerations, interference mitigation, and ground stations (specific to LEO providers).

Beyond the checklist, reviewers also evaluated the equipment specified in the application, including fiber OLT/ONT, radios and antennas, routers, switches, and access gear, and whether the equipment specifications were modern and capable of supporting future upgrades.

After the initial technical review was completed, each project area application was then reviewed against several geography-specific analyses conducted by the IBO's technical reviewers, cartographic specialists, and subject matter experts from prior state-level broadband deployment programs. During this project area-specific review process, the IBO considered the unique scalability challenges facing providers, including areas of dense tree canopy cover and foliage, the varied topography in the northern and southern portions of the state, lake-effect weather patterns impacting the northwestern portion of the state, areas with higher population density, and how multiple of these factors would impact deployment in a project area. Each provider's evidence and documentation were thoroughly reviewed against any project area-specific factors that would impact an applicant's ability to scale.

Finally, the IBO also considered the full volume of each provider's applications and whether scalability would be possible for all locations for which they applied.

With these evaluations in hand, the IBO made a final assessment about priority broadband status for each individual application on a project area-by-project area basis. For project areas with more than one priority broadband project application, the IBO then determined an awardee by applying the scoring criteria enumerated in Requirement 13 below. Where a project area had no application with priority broadband project status, non-priority broadband project applications were considered for award.

Subgrantee Selection Certification (Requirement 13)

13.1 Subgrantee Selection Scoring Criteria

NTIA Guidance: Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

The Indiana Broadband Office evaluated each application in the Benefit of the Bargain round using the prioritization framework outlined in Section 3.4 of the Restructuring Policy Notice.

Primary Scoring Criteria

In alignment with Section 3.4, applications for the same general project area were first evaluated on cost-effectiveness, measured by minimal BEAD Program outlay. The IBO calculated the outlay based on the subsidy cost per eligible location in the project area.

If multiple applications to serve the same general project area proposed a per-location subsidy cost within 15% of the lowest-cost proposal, the IBO evaluated competing applications and applied secondary scoring criteria, outlined in the section below.

Secondary Scoring Criteria

Criteria	Points Available
Preliminarily Awarded Project Area	50 Points
Speed of Network and Other Technical Capabilities	40 Points
Speed to Deployment	10 Points
TOTAL	100 Points

Previously Preliminarily Awarded Project Area – 50 Points

Definition: This criterion recognized applications in project areas where the IBO had already identified a preliminary subgrantee in a prior subgrantee selection round.

Scoring: Applicants preliminarily selected for a specific project area in Indiana's round of subgrantee selection that occurred before the Restructuring Policy Notice received 50 points. If no applicant was previously selected, 0 points were awarded. Unallocated points were not redistributed to other categories.

Speed of Network and Other Technical Capabilities – 40 Points

Definition: This criterion considered the network speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.

Scoring: The applicant proposing the fastest speeds with minimal latency was awarded 40 points. If multiple applicants proposed equivalent speeds and latency, then other technical capabilities were used as distinguishing factors.

Speed to Deployment – 10 Points

Definition: This criterion rewarded applicants who committed to begin service earlier than the four-year maximum deployment window.

Scoring: The applicant proposing the earliest deployment timeline received 10 points toward the overall score.

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

14.1 Environmental and Historic Preservation Documentation

NTIA Guidance: Attachment (Required): Submit a document which includes the following:

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

Please see the file titled IN_FP_Requirement 14_EHP_Documentation.

Consent from Tribal Entities (Requirement 15)

15.1 Resolution of Consent from Tribal Governments

NTIA Guidance: Attachment (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.

No BEAD-eligible locations exist within federally recognized Tribal Lands in Indiana.

Prohibition on Excluding Provider Types (Requirement 16)

16.1 Certification of Inclusive BEAD Subgrant Eligibility

NTIA Guidance (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 Applicable Requirements of Waivers

NTIA Guidance: If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. If not applicable to the Eligible Entity, note 'Not applicable.'

Not applicable.

17.2 Completed Waiver Request Form

NTIA Guidance (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.