Connecting All Missourians

BEAD Final Proposal

Missouri Department of
Economic Development

Message from the Director

"Our administration is committed to making sure we connect all Missourians by providing access to reliable, high-speed internet," said Missouri Governor Mike Kehoe. *"With the submission of Missouri's final BEAD proposal, we are taking a major step forward in closing the digital divide, strengthening communities, and ensuring our state is ready to compete, thrive and move at the speed of business in a technology-driven economy."*

On behalf of Governor Kehoe and Director Hataway I am thrilled to share Missouri's Final Proposal for the Broadband Equity Access and Deployment (BEAD) program. Through our Missouri-focused and data-driven approach, the Office Broadband Development (OBD) awarded every one of the more than 200,000 eligible locations to be served by reliable high-speed internet, all while utilizing only 46% of Missouri's BEAD allocation for broadband deployment.

Our awards will...

- Provide reliable service to 100% of locations eligible for BEAD funding
- Reach 81% of locations with fiber-based broadband service
- Save nearly $1 billion in public funding
- Leverage over $420 million in private funds
- Award 42 Providers, including 29 Missouri businesses
- Invest over $458 million in Missouri-based businesses

We began this journey three years ago by hearing from the citizens of Missouri about the challenges they face engaging in the digital world. Today we are happy to say that these investments will change that reality for homes and businesses across the state.

This is vital step in the BEAD process, but it is not the end. OBD will be accepting public comment for seven days before submitting our Final Proposal to the National Telecommunications and Information Administration (NTIA). Once our list of projects is approved, construction can begin. Awarded providers have four years to complete their commitments. Our office will be working hard with awardees to ensure that these once-in-a-lifetime investments are completed.

These results would not have been possible without robust participation from internet service providers. The BEAD process has taken time and has seen many changes. Throughout the process, Missouri had a wealth of providers anxious to help address the needs of so many across the state.

Thank you to Governor Kehoe and former Governor Parson for their leadership on the long-term goal of Connecting ALL Missourians. Thank you to the Missouri General Assembly for their trust and support. And thank you to our incredible team at OBD and the Department of Economic Development! Without their hard work, determination, and steadfastness, this effort would have never been possible.

We welcome your comments by using the link here.

Sincerely,

BJ Tanksley, Director of the Office of Broadband Development

Overview

The State of Missouri has drafted the following BEAD Final Proposal, as required under the Broadband Equity, Access, and Deployment (BEAD) Program. Upon receipt and consideration of comments to this proposal, the State of Missouri will submit this document for consideration to the National Telecommunications and Information Administration (NTIA) for approval.

Upon approval of this proposal, the Missouri Office of Broadband Development (OBD), housed with the Missouri Department of Economic Development (DED), will have access to its full BEAD allocation required to implement the BEAD program outlined herein.

Comments on the BEAD Final Proposal must be submitted via the BEAD Final Proposal Comment Portal no later than 11:59 p.m. on September 26, 2025, for review and consideration. The BEAD Final Proposal Comment Portal can be accessed [here](#).

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Final Proposal Data Submission

Unless otherwise specified, all Final Proposal Data Submission documents utilize templates provided by NTIA.

0.1 Attachment (Required): Subgrantees CSV file (named "fp_subgrantees.csv")

Subgrantees CSV file can be found here: https://ded.mo.gov/sites/g/files/zuston466/files/media/file/2025/09/fp_subgrantees.csv

0.2 Attachment (Required): Deployment Projects CSV file (named "fp_deployments_projects.csv")

Deployment Projects CSV file can be found here: https://ded.mo.gov/sites/g/files/zuston466/files/media/file/2025/09/fp_deployment_projects.csv

0.3 Attachment (Required): Locations CSV file (name "fp_locations.csv")

Locations CSV file can be found here: https://ded.mo.gov/sites/g/files/zuston466/files/media/file/2025/09/fp_locations.csv

0.4 Attachment (Required): No BEAD Locations CSV file (named "fp_no_BEAD_locations.csv")

No BEAD Locations CSV file can be found here: https://ded.mo.gov/sites/g/files/zuston466/files/media/file/2025/09/fp_no_bead_locations.csv

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

Yes.

0.6 Attachment (Required- Conditional on a 'Yes' Response to Intake Question 0.5): CAIs CSV file (named "fp_cai.csv")

CAIs CSV File can be found here:
https://ded.mo.gov/sites/g/files/zuston466/files/media/file/2025/09/fp_cais.csv

SUBGRANTEE SELECTION PROCESS OUTCOMES (REQUIREMENT 1)

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 State of Missouri's subgrantee selection process followed the processed approved by NTIA in the states Initial Proposal, modified as necessary to incorporate the revised guidance included in the BEAD Restructuring Policy Notice that was released on June 6, 2025. Following the release of the BEAD Restructuring Policy Notice, the Missouri Office of Broadband Development (OBD) issued a *Notice of Program Changes due to Federal Restructuring Policy Notice* on July 3 that provided guidance on revised program requirements, updated application timelines and key dates, evaluation criteria, mapping changes, and the required elimination of certain regulatory requirements. The guidance released by OBD on July 3 complied with the requirements of the BEAD Restructuring Policy Notice and outlined how OBD would prioritize extending broadband access on a technology-neutral basis to unserved locations, underserved locations, and Community Anchor Institutions (CAIs).

OBD rescinded preliminary sub-grantee award selections made before the release of the BEAD Restructuring Policy Notice and conducted a new subgrantee selection process for every BEAD eligible location from July 10 to August 20. The Restructuring Application rounds allowed applicants – regardless of technology employed or prior participation in the program – to fairly compete for BEAD funding.

Eligible applicants were asked complete Pre-qualification applications, followed by BEAD Scoring Applications. Previously pre-qualified applicants were not required to resubmit, but OBD reopened the pre-qualification process ahead of the additional funding rounds. Pre-qualification applications ensured that applicants were eligible for the BEAD program, while BEAD Scoring Applications focused on the substantial components of the deployment projects proposed by sub-grantees.

In Rounds 1 and 2 of the Restructuring Application Round, applicants were allowed to identify project locations in different ways. In Round 1 applicants were required to identify which pre-defined Application Areas they proposed to serve and which locations, if any, within that application area should be excluded from their applied-for project. In Round 2, applicants were allowed to submit bids to serve individual locations, bids to serve a group of locations as a combined project or sub-project, and bids to serve any location in the state at a set unit price. In both cases, applicants were allowed to remove high-cost locations from their application in line with the requirements of the BEAD Restructuring Notice.

At the conclusion of the Restructuring Application Round, the Missouri BEAD Program achieved the following outcomes:

- Awarded 100% of BEAD eligible locations for a total deployment cost of $791,917,340, saving nearly $1 billion dollars
- Average cost per BEAD eligible location of $3,697.45
- Awarded BEAD Projects to 42 subgrantees

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.

To ensure a fair, open, and competitive application process, OBD engaged in stakeholder outreach and technical support tailored to various applicants and technology types. BEAD applicants, regardless of technology type, were supported through multiple resources provided by OBD.

OBD took the following steps to ensure a **fair** process:

- Developed a BEAD Guide to Apply and Application Guidelines which outlined application requirements and discussed how to navigate and complete an application prior to the restructuring.
- Developed the *BEAD Notice of Program Changes due to Federal Restructuring Policy Notice* which outlined the major program changes mandated in the *BEAD Restructuring Policy Notice*.

- Ensured that all applicants had the same opportunities to cure applications by providing feedback and accepting responses within standardized time periods.
- Provided applicants and stakeholders notification of program changes and program updates via webinars, office hours sessions, email blast notification, and website postings.
- MO OBD Grants Specialist team members provided technical assistance as needed for applicants that needed assistance with application completion and subsequent application curing.
- Provided internet service providers the opportunity to report unsubsidized service currently available in BEAD-eligible areas ahead of the submission of the BEAD final proposal.
- Provided local governments the opportunity to object to a mischaracterized broadband serviceable location (BSL) determination to ensure all legitimate households and businesses can receive broadband service.
- Required applicants to abide by all applicable federal and state anti-collusion laws.
- Required applicants to abide by all federal and state conflict of interest laws.
- Trained OBD team members to review applications in a detailed and unbiased manner.

OBD took the following steps to ensure an **open** process:

- Placed no restrictions on the types of applicants that could apply for BEAD funding as defined in the BEAD NOFO, BEAD Restructuring Policy Notice, and the approved Initial Proposal for Missouri.
- Structured the application cycle so that applicants were allotted the same number of days to submit and cure applications.
- Utilized a wide variety of communication channels to engage various broadband stakeholders throughout the state.
- Upon NTIA's release of the June 6 BEAD Restructuring Policy Notice, OBD notified unlicensed fixed wireless (ULFW) providers of the opportunity to validate the existence of service that qualified to preempt BEAD funding. UFLW providers were given a 7-day window to submit claims and subsequently submit evidence that BEAD funding is not required for their service areas.

OBD took the following steps to ensure a **competitive** sub-grantee selection process:

- Utilized a scoring criterion that prioritized lowest cost and provided equal secondary criteria for all applicants.
- Required applicants to abide by all applicable federal and state non-disclosure and confidentiality laws.
- Promoted the BEAD program and encouraged providers to participate in the program before and after the BEAD Restructuring Policy Notice by providing timely and transparent information via webinars, publications,
- Received applications from fiber-optic broadband providers, hybrid fiber coaxial broadband providers, licensed and unlicensed fixed wireless providers, and LEO satellite operators. Due to the variety of providers that applied, each provider type was provisionally awarded locations during the federally mandated restructuring round, demonstrating a competitive and neutral subgrantee selection process.

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.

OBD affirms that, when no application was initially received, OBD followed a procedure consistent with the process approved in Missouri's Initial Proposal as modified to comply with NTIA's BEAD Restructuring Policy Notice. When no application was received for a location or set of locations in Round 1, OBD carried the location into Round 2. There were no locations for which no application was received in Round 2.

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.

The Missouri Office of Broadband Development revised the eligible CAI list to conform with the requirements of the BEAD Restructuring Policy Notice. All entities that qualified as a school, library, health clinic, health center, hospital or other medical providers, public safety entity, institution of higher learning, and public housing organizations remained as a CAI under the revised guidance.

Entities that are reported as a community support organization were evaluated to determine whether they facilitate the greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals, if they have a direct impact on expanding access to broadband.

Examples of qualifying entities include city halls, and community groups such as churches, senior centers, non-profits, etc., that provide access to a computer lab or loan hotspots to citizens in need.

MO OBD has declined to remove CAIs that are designated as senior centers, which carry the definition of a community center for older adults, especially senior citizens, in which they can gather for social, educational, and other activities. Often, these senior centers educate aging individuals on computer basics, online safety, social media, and other digital skills to stay connected and informed, which facilitates the greater use of broadband service by this vulnerable population that, without this education, would lack the skills necessary to fully utilize broadband service. Therefore, the identified CAIS, and the general term "Senior Center" match the statutory definition of a Community Anchor Institution and should be awarded BEAD funding.

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

TIMELINE FOR IMPLEMENTATION (REQUIREMENT 3)

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.

Yes, MO OBD BEAD applicants were vetted through a Pre-qualification Application to ensure that minimum qualifications for financial and managerial capacity, technical, operational capability, and other requirements outlined in 47 U.S.C. & 1702 (g)(2)(A), the BEAD NOFO, Missouri Initial Proposal Volume II and supplementary NTIA guidance were met, validating their ability to fulfill their proposed schedule. Furthermore, MO OBD required subgrantees to provide the following documentation:

- Irrevocable Standby Letter of Credit (Value of less than 10% of the grant award amount)- *Please note that OBD does not require an actual Letter of Credit (LOC) or Performance Bond (PB) from our preliminary awardees currently. Instead, OBD is requesting a letter committing to issue an irrevocable LOC/PB when we are ready to enter a subgrant agreement.*
- BEAD Project Budget with Itemized Cost Breakdown
- BEAD Project Timeline
- Milestone Schedule
- Network Design and Diagram
- A Description of the Technology Used, including the mixture of technology, the speeds and latency the technology or technologies can deliver, the useful life of the assets, and improvements to service that will be possible over the course of the life of the project without additional public funds
- Professional Engineer Certification for Project Plans
- Capital Investment Schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the award.

The planned date of service provision was a scoring element used when selecting BEAD applicants. All awarded applicants indicated service provision by a date within Missouri's period of performance.

Through sub-grantee monitoring and oversight, MO OBD will track project progress according to the timelines and milestones submitted in applications. MO OBD staff will provide technical assistance through the period of performance to address any issues or delays to deployment in a timely manner.

Subgrantee monitoring and engagement with subgrantees will allow MO OBD to ensure that all BEAD subgrantee activities are completed within NTIA's timeline in accordance

with the BEAD NOFO, and 2 C.F.R. 200.344. Project timelines will be memorialized in subgrantee agreements; failure to meet this contractual timeline will result in contractual penalties.

OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4)

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.

BEAD Monitoring Plan | Department of Economic Development

Draft subgrantee agreements (LEO) (non-LEO)

4.3 Question (Y/N): Certify that the subgrant agreements will include, at a minimum, the following conditions:

a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;

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

c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;

d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;

e. Subgrantee accountability practices that include the use of claw back 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 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.

MO OBD will be posting a draft Final Proposal document for public comment on September 19, 2025. The public comment period will run for 7-days and will close on September 26, 2025. During this time members of the public may provide feedback on the final proposal document and subsequent attachments.

CHALLENGE PROCESS RESULTS (REQUIREMENT 6)

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

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.

MO OBD publicly posted the final location classifications on the following Office of Broadband Development's mapping page. Approved location data was posted on November 22, 2024.

- Office of Broadband Broadband Availability Mapping | Department of Economic Development
- Broadband Equity, Access, and Deployment (BEAD) Program | Department of Economic Development

UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7)

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

Yes

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

NOT APPLICABLE

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

NOT APPLICABLE

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

Yes

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

NOT APPLICABLE

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

NOT APPLICABLE

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

Yes

7.8 Question (Y/N): Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state

enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or NTIA | 54 Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.**

Yes

IMPLEMENTATION STATUS OF PLANS FOR COST AND BARRIER REDUCTION, COMPLIANCE WITH LABOR LAWS, LOW-COST PLANS, AND NETWORK RELIABILITY AND RESILENCE (REQ. 11)

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.

The implementation plans described in Missouri's approved Initial Proposal Volume II Requirement 14 related to cost and barrier reduction to deployment are in progress. The plans described in Missouri's Initial Proposal Volume II Section 2.10 are as follows:

Improved Communication

MO OBD understands that miscommunication between parties has the potential to lead to delays in permitting and permissions required to proceed with broadband expansion projects. To facilitate clearer lines of communication, OBD has gathered and will continue to gather and publicize reliable contracts for BEAD applicants and other stakeholders in the permitting process.

Gain Certification from Missouri 811

To help ensure that there are fewer accidents, and that safer digging / excavation is practiced in these projects, the Office of Broadband Development requires employees of subgrantees and their contractors / sub-contractors with relevant responsibilities on BEAD projects to take the Missouri 811 Missouri Damage Prevention Awareness Training Course. OBD requires subgrantees, their contractors and sub-contractors to document completion of the course by their employees and submit the documentation to OBD.

Flagging and Marking

A major problem that has faced broadband deployment when it comes to construction for these projects is flagging and marking for underground utilities. OBD requires all BEAD subgrantees and their contractors and subcontractors to use Missouri 811 online portal to request markings or flagging of underground utilities. This online process helps schedule and streamline the markings/flagging process, which will reduce the burden of BEAD projects on Missouri 811 and help the construction of these projects start sooner.

Streamlining Permitting

A major issue that OBD has discovered is that the companies involved in broadband is having trouble with obtaining permits from third parties (i.e., federal, state, local governments, and railroads). OBD continues to work with subgrantees to understand these requirements and encourage them to begin the process of securing permits early in the process of applying for BEAD funding. On the ends of those who grant the permits, OBD continues to work with local governments to communicate best practices from streamlining their permitting process. With these wait times cut on the permitting process, construction can start sooner.

Documentation and Communication of BEAD Commitments

Conversations with various stakeholders on broadband deployment processes, including railroads, local governments, and Missouri 811 have indicated that information about the location of planned BEAD projects and their general timeline for construction could help these agencies allocate resources and reduce the burden posed by surges in demand associated with BEAD projects. OBD will continue to document relevant information about BEAD-funded broadband projects and communicate them to these stakeholders to enable improved planning and responsiveness. OBD will also work with the State Historic Preservation Office to flag the potential burden associated EHP reviews for BEAD projects and identify additional efficiencies.

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

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

SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS (REQ. 12)

12.1 Text Box: Describe how the Eligible Entity applied the definition of Priority Project as defined in the IIJA and the BEAD Restructuring Policy Notice.

In determining applications for Priority and Non-priority Broadband Status, MO OBD adhered to the statutory definition of "Priority Broadband Project" as established by the Infrastructure Investment and Jobs Act (IIJA), codified at 47 U.S.C. & 1702 (a)(2)(I), and further clarified in the BEAD Restructuring Policy Notice issued by NTIA on June 6, 2025.

Pursuant to IIJA and the BEAD Restructuring Policy Notice, MO OBD defined a Priority Broadband Project as one that:

> "[provides] broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services."

MO OBD implemented a technology neutral approach and eliminated restrictive emphasis on any given technology type. No technology type or provider was excluded categorically. Instead, projects were evaluated based on whether the proposed network met the definition of a Priority Broadband Project for the specific applied-for area by assessing project area geography, topography, location density, and capacity of applicants. No single factor was determinative given the diverse nature of Missouri's physical characteristics and the variety of applicants seeking funding. Reviewers considered multiple factors to reach a determination.

To ensure consistency with the technology neutral approach, MO OBD:

- Allowed any applicant to seek Priority Broadband Project classification, regardless of technology type
- Required applicants to provide supporting documentation sufficient for MO OBD to assess whether the proposed network:
    - Will meet or exceed the statutory requirement for broadband speed (100/20 Mbps and less than or equal to 100 MS latency.

- o Can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.
- Applied a consistent and uniform review methodology

Factors considered in Missouri's review can be split into two categories: (1) factors based on the reported and substantiated capabilities of the network and (2) factors based on the "evolving connectivity needs" of the specific areas applied for. OBD's process allowed applicants to substantiate their network's ability to "scale" over a ten-year period.

Network Capacity ("Can easily scale"):

Submissions indicating an ability to easily scale networks were evaluated based on:

1. The reported capacity of the scaled network, relative to the number of project locations, benchmarked against an expectation that the network must demonstrate the ability to provide at least 5 Mbps of simultaneous capacity to each BSL in the project area.
2. The speeds of the scaled network.
3. The cost of implementing the proposed network improvements relative to the cost of the project.

Project Area Characteristics ("Evolving Connectivity Needs"):

OBD further considered a series of factors attaching to particular application areas that might call for additional capacity:

1. Tree canopy in the project area
2. Population density of the project area
3. Population growth in the project area
4. Projected growth of Knowledge Intensive Businesses (KIBs)

As a result of this process, locations served by satellite, wireless, fiber, and coaxial cable were treated as constituting priority broadband projects in some project areas.

SUBGRANTEE SELECTION CERTIFICATION (REQUIREMENT 13)

13.1 Text Box: Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity.

Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

OBD evaluated subgrantee applications according to the prioritization framework in Section 3.4 of the BEAD June 6th Restructuring Policy Notice. These criteria allowed OBD to evaluate competitive Priority and Non-Priority Broadband Project applications.

- **Excessive Cost Threshold:** The Restructuring Policy Notice language states, *"NTIA declines to adopt a national cost threshold over which a project would be deemed excessive. However, NTIA hereby reserves the right to reject any proposed deployment or specific BSL connection for which costs to deploy are excessive, as determined by NTIA based on the cost characteristics of the area to be served."* In order to best serve the state of Missouri and allow applicants to apply with a greater degree of certainty OBD set an Excessive Cost Threshold, MO OBD set its Excessive Cost Threshold based on the results of subgrantee selection prior to the BEAD Restructuring Policy Notice, CostQuest cost modeling data, and guidance in the BEAD Restructuring Policy Notice. MO OBD determined that $15,000 was a reasonable excessive cost threshold for BEAD eligible locations across the state.

- **Primary Criteria – Minimal BEAD Program Outlay:** If a priority broadband project did not exceed the excessive cost threshold, and there were no other priority broadband projects proposed for the area, the priority broadband project was awarded (excluding any removed locations). If there were multiple priority broadband projects, the lowest cost priority broadband project (that does not exceed the excessive cost threshold) was preliminary awarded, if the next-lowest cost priority broadband project was not within 15% of the per-location cost of the lowest cost.

  If there were multiple priority broadband projects within 15% of the per-location cost of the lowest-cost application (15% cost window), OBD scored those projects using the scoring rubric in the table below. The application with the highest score were preliminarily awarded (excluding any removed locations). If no priority broadband project was below the excessive cost threshold and no non-priority requested a BEAD outlay within 15% of the cost of the lowest cost non-priority

broadband project, the lowest cost non-priority broadband project was preliminarily awarded (excluding removed locations).

If no priority broadband project was below the excessive cost threshold or there was no priority broadband project and there were multiple non-priority broadband projects, the lowest-cost project and any that were within the 15% cost window were scored using the scoring rubric in the table below. The application with the highest score was preliminary awarded (excluding removed locations). For the purposes of selecting between proposals separated by less than 15% of the cost of the lowest cost proposal, proposals were scored using the following criteria.

- **Secondary Criteria:** As described above, if there were multiple applications within the 15% cost window of the lowest cost application were scored based on the rubric below.

Speed of Technology	
Less than 1 Gbps / 500 Mbps	0 points
Greater than or equal to 1 Gbps / 500 Mbps and less than 1 Gbps / 1 Gbps	5 points
Greater than or equal to 1 Gbps / 1 Gbps	10 points
Latency	
> 100 ms	0 points
Less than or equal to 100 ms and greater than 50 ms	5 points
Less than or equal to 50 ms	10 points
Round 1 Preliminary Subgrantee	
No	0 points
Yes	2 points
Speed to Deployment	
Applicants may assume that subgrants will be issued Dec. 4, 2025.	
Project completion within 3 years of receipt of subgrant	1 point
Date within 2 years	2 points
Date within 1 year	4 points
Maximum Points	**26 points**

ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) DOCUMENTATION (REQUIREMENT 14)

14.1 Attachment (Required): Submit a document which includes the following: Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's 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/environmentalcompliance/projects/regionalprogrammatic-environmental-impact-statements.

Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS. Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

[BEAD Final Proposal Environmental and Historic Preservation Documentation | Department of Economic Development](#)

CONSENT FROM TRIBAL ENTITIES (REQUIREMENT 15)

15.1 Attachment(s) (Required if any deployment project is on Tribal Lands): Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land.

The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of 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 established tribal lands in Missouri.

PROHIBITION ON EXCLUDING PROVIDER TYPES (REQUIREMENT 16)

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.

OBD requests two waivers:

1. A waiver requesting 832 locations excluded from BEAD funding on the basis of planned service challenges in Missouri's state challenge process be restored to eligibility because the planned projects were not completed as of Dec. 31, 2024.
2. A limited waiver of the 25% BEAD match requirement.

   BEAD Final Proposal Waivers can be found here:
   https://ded.mo.gov/sites/g/files/zuston466/files/media/file/2025/09/fp_waivers.zip