

September 3, 2025

Final Proposal Submitted

This document reflects Montana's BEAD Final Proposal submitted to the National Telecommunications and Information Administration (NTIA) on September 3, 2025.

Montana BEAD Program Final Proposal

State of Montana

Montana Broadband Office
Montana Department of Administration



A NOTE FROM THE DIRECTOR

The State of Montana is a national leader in supporting closing the digital divide and connecting all our citizens with reliable high-speed internet. In 2021, we allocated \$310 million in America Rescue Plan Act dollars to support broadband deployment, connecting 57,000+ new locations in the state. With the enactment of the 2021 Investment Infrastructure and Jobs Act, Montana received nearly \$629 million in Broadband, Equity, Access, and Deployment (BEAD) funds to continue these efforts and close the gap for our nearly 70,000+ locations without reliable high-speed internet.

Montana has long supported the advancement of reliable high-speed internet, yet we faced significant deployment challenges under the prior administration's BEAD program requirements. Montana lacked adequate funding to meet the prior programmatic requirements. We continued to receive delayed and conflicting guidance, and the added non-statutory requirements frustrated our providers and chilled interest in the program. Further, Montana is the "Big Sky" state and ranks fourth in this great nation for size, yet 43rd in population, with only 7.4 people per square mile. Our low population density and difficult yet beautiful landscape increase deployment costs for our providers. Even with our programmatic concerns and deployment challenges, we are still proud to have been the first in the country to launch our application portal in August 2024.

The BEAD Restructuring Policy Notice issued by NTIA on June 6th, 2025, eased many of these burdens and allowed us to develop a strategy that enables us to reach all unserved and underserved locations at the best possible cost to the taxpayer. The Policy Notice enabled Montana to accelerate deployment while reducing regulatory burdens and saving millions of dollars for the taxpayer. We launched the "Benefit of the Bargain" round on July 7th and closed our application window on July 25th. As a result of this new round, we achieved the following:

- Received 47 applications, representing fiber to the premise (FTTP), fixed wireless (licensed and unlicensed), and low earth orbit satellites for a total deployment cost of \$308 million—saving over \$300 million in deployment costs.
- An average cost per BSL of \$4,281 with a maximum per-location limit of \$15,000.
- 100% coverage of all unserved and underserved locations across the state.

On behalf of the State of Montana and the Montana Broadband Office (MBO), I am proud of the work that we've done to finish the drill and close the digital divide by providing reliable high-speed internet to all Montanans.

We will continue to manage this generational investment with urgency, accountability, and transparency. We are proud to publish this Final Proposal, and we invite public comment via connectmt@mt.gov. Thank you for your continued support and collaboration as we work collectively to deploy these dollars successfully and close the digital divide in the Big Sky state.



Misty Ann Giles
Director, Department of Administration

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BACKGROUND AND INTRODUCTION

This Final Proposal document was prepared by the Montana Broadband Office (MBO) and reflects the results of MBO's deployment of the subgrantee selection process for the U.S. Department of Commerce's National Telecommunications and Information Administration (NTIA) Broadband Equity, Access, and Deployment (BEAD) Program. This document serves as the final submission for MBO's grant funding and as an update to the previously approved Initial Proposal with modifications to reflect the BEAD Restructuring Policy Notice. MBO will enter these narrative responses and answer questions directly within the NTIA Grants Portal BEAD Final Proposal intake module, supplemented by attachment uploads.

This document will be posted publicly on the ConnectMT website. The public may comment on this document, and MBO will consider those comments prior to final submission to NTIA.

FINAL PROPOSAL REQUIREMENTS

FINAL PROPOSAL DATA SUBMISSION

0.1 Subgrantees CSV File

Complete and submit the Subgrantees CSV file (named "fp_subgrantees.csv") using the NTIA template provided.

The Subgrantees CSV file can be found on the ConnectMT website. The file is also attached.

0.2 Deployment Projects CSV File

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

The Deployment Projects CSV file can be found on the ConnectMT website. The file is also attached.

0.3 Locations CSV File

Complete and submit the Locations CSV file (named "fp_locations.csv") using the NTIA template provided.

The Locations CSV file can be found on the ConnectMT website. The file is also attached.

0.4 No BEAD Locations CSV File

Complete and submit the No BEAD Locations CSV File (Named "fp_no_BEAD_locations.csv") using the NTIA template provided.

The No BEAD Locations CSV file can be found on the ConnectMT website. The file is also attached.

0.5 BEAD Funds to Serve CAIs

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. The MBO does intend to use BEAD funds to serve Community Anchor Institutions (CAIs).

0.6 CAIs CSV File

Conditional on a 'Yes' response to intake question 0.5. Complete and submit the CAIs CSV file (named "fp_csi.csv") using the NTIA template provided.

The CAIs CSV file can be found on the ConnectMT website. The file is also attached.

1. SUBGRANTEE SELECTION PROCESS OUTCOMES (REQUIREMENT 1)

1.1 Subgrantee Selection Process Deployment

Text Box: *Describe how the Eligible Entity's deployment of the 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 following is the robust, fair, open, and highly competitive subgrantee selection process that MBO deployed, as outlined in its NTIA-approved Initial Proposal Volume II as modified by the BEAD Restructuring Policy Notice. This process consisted of the following phases: Prequalification, Main Round/Benefit of the Bargain Round.

Prequalification

The first step in the subgrantee selection process consisted of a prequalification phase, which the MBO launched on March 12, 2024, and closed on October 31, 2024, in accordance with Initial Proposal Volume II. MBO received 26 prequalification applications; 22 were determined to be eligible, and 4 were found to be ineligible.

The prequalification phase of the subgrantee selection process was used to determine whether applicants met the BEAD minimum eligibility requirements, including financial capability, organizational capability, certifications, and compliance. Applicants were required to submit materials demonstrating the following capabilities, as documented in various subsections of the Initial Proposal Volume II: financial capability, managerial capability, technical capability, compliance with applicable law, operational capability, information on other public funding, EHP and BABA compliance, labor standards and protections, and certification of compliance.

On June 6, 2025, the NTIA BEAD Restructuring Policy Notice was released, requiring Eligible Entities to conduct a Benefit of the Bargain Round for subgrantee selection. As required by the Policy Notice, MBO reopened the prequalification process. The following were invited to participate in the reopened prequalification process: new entrants seeking to participate in the BEAD program (regardless of technology), and existing applicants who had previously failed prequalification and chose to update their materials to seek prequalification again. Previously approved prequalified applicants were not required to reapply.

The prequalification round was mandatory to participate in subsequent phases of the Montana BEAD program. Prequalification did not guarantee an award.

Applicants were able to submit prequalification applications between June 13, 2025, and June 27, 2025. Providers and previous applicants were notified of this new prequalification round through an email notice and a [press release](#). MBO also hosted an update webinar that was open to the public, and a recording was made available on the website. Materials from this webinar were made available on the ConnectMT website. MBO reviewed newly submitted prequalification applications in accordance with the new guidance provided by NTIA in the BEAD Restructuring Policy Notice. MBO received 6 new prequalification applications; 4 were determined to be eligible, and 2 were found to be ineligible.

Main Round/Benefit of the Bargain

Prior to the release of the BEAD Restructuring Policy Notice, [MBO was the first in the nation](#) to launch a Main Round for BEAD applications. Applicants were able to submit applications between August 13,

2024, and October 31, 2024. MBO received a total of 27 Main Round Priority applications and 15 Main Round Non-Priority applications. MBO then initiated the application review and negotiation process as outlined in Initial Proposal Volume II. Pending new guidance from NTIA and the Trump Administration, MBO paused all other program activities.

On June 6, 2025, the NTIA BEAD Restructuring Policy Notice was released, requiring MBO to conduct a Benefit of the Bargain Round, in which MBO would evaluate or reevaluate applications for every BEAD-eligible location, regardless of technology. Any applicants who had previously submitted a successful prequalification application were able to apply to the Benefit of the Bargain Round. Applicants who had previously submitted project applications in the Main Round could choose to either update and resubmit their existing application or submit a new application.

Based on the BEAD Restructuring Policy Notice, MBO updated its BEAD application guidance to reflect the following changes in requirements for the Benefit of the Bargain Round:

- Montana defined Priority Broadband Projects as a project 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 advance services. Applicants were required to indicate if their applications were Priority and submit evidence supporting that claim as part of their new or updated application.
- Montana also updated its scoring criteria to focus on cost minimization. The primary scoring criteria is based on minimal BEAD Program outlay, emphasizing the lowest overall cost to the program. The minimal BEAD program outlay was calculated by subtracting the applicant's proposed match from the total project cost and assessing the cost-efficiency per location, specifically, the total BEAD funding required divided by the number of Broadband Serviceable Locations (BSLs) served. If multiple applications received had costs within 15% of the lowest cost per location bid in the same general project area, the following secondary scoring criteria were calculated: speed of network and other technical capabilities (50 points max), and previously participated Main Round applicants (50 points).
- Montana reduced and/or removed the following NOFO provisions in alignment with the Restructuring Policy Notice: labor, employment, and workforce development, climate resiliency, open access and net neutrality, local coordination and stakeholder engagement, non-traditional broadband providers, middle-class affordability plan, and low-cost service option.

More information regarding scoring can be found in response to Q13.1.

The Benefit of the Bargain Round phase of the subgrantee selection process was comprised of the following application review process steps: intake and completeness, priority status review, scoring, programmatic review, negotiation, and preliminary selection. This application round opened on July 7, 2025, and closed on July 25, 2025.

Intake and Completeness was the first stage of the Benefit of the Bargain Round application review process, where completeness reviewers ensured that applicants answered all questions and uploaded documentation where needed. This process was applied to both new and resubmitted applications. Reviewers specifically reviewed documents to ensure they could be opened and contained content. Reviewers also verified that applicants had completed a prequalification application and had been deemed prequalified. Curing occurred if applicants left questions

unanswered, documents were blank/unable to be opened, or if the incorrect templates were utilized. Applicants were given 2 business days to cure any identified issues.

Priority Status Review: For the Benefit of the Bargain Round, MBO performed a detailed technical review to validate applicants' claims that their projects are Priority projects. Once applications were determined to be Priority or non-Priority, they were then scored. This technical review was based on templates completed by applicants that captured information needed to assess the project design against the Policy Notice definition of Priority Broadband.

MBO used a methodology for engineering review that is designed to align with NTIA's Policy Notice and FAQ, which requires that states "establish a review methodology that addresses each component of the statutory definition of a Priority Broadband Project and that can be fairly applied to assess all proposed projects that request Priority Broadband Project Status."

The methodology is designed to ensure a project-by-project, area-by-area determination that enables every applicant to demonstrate that its proposed project meets the Priority requirements for the specific geographic area for which that project is proposed, as directed by the FAQ, which states that "an Eligible Entity may determine that an applicant with several project proposals across the state may not merit Priority Broadband Project status for all proposals if a proposed technical capability showing is not sufficiently tailored to a given project area."

The methodology enables fair consideration of all applications, regardless of the technology type proposed, to allow for informed, data-driven determination of whether a given project is capable of meeting the Priority Broadband Project definition.

The methodology relies on data provided directly by the applicant and does not rely on outside studies or third-party data.

The following elements were required to be considered priority:

- Detailed Description of Applicable Network Components
 - Logical network diagram, access layer, headend & internet backbone connectivity, reliability & quality of service, customer premises equipment, tower locations, uplink/downlink throughput, gateway infrastructure & satellite uplinks
- Capacity Performance Calculations
 - A minimum of 100 Mbps download and 20 Mbps upload
 - ≤ 100 ms roundtrip latency
 - Simultaneous 5 Mbps to all connected locations, including BEAD and non-BEAD users
- Scalability Performance Calculations
 - Ability to meet performance targets five years after initial deployment, assuming a 25% annual increase in capacity demand.
- Support for 5G and Advanced Services Calculations
 - Ability to deliver at least 300 Mbps download and 30 Mbps upload capacity to each of three distinct locations within the proposed project area (totaling 900/90 Mbps aggregate capacity)
 - Maintain roundtrip latency no greater than 100 ms on each of these links

Scoring was the second stage of the Benefit of the Bargain Round. MBO reconducted this stage for the Benefit of the Bargain Round, which included new and resubmitted applications. For the Benefit of the Bargain Round, the scoring process followed the Montana Communications Advisory Commission-approved rubric and BEAD Restructuring Policy Notice guidance, which prioritized cost minimization. The primary scoring criterion was minimizing BEAD program outlay. Specifically, proposals were assessed based on the total BEAD funding required to complete the project, calculated as the total project cost minus the applicant's proposed match, and the cost to the Program per location (i.e., total BEAD funding divided by the number of BSLs the project would serve).

Secondary scoring criteria in the Benefit of the Bargain Round were applied if multiple applications proposed costs within 15% of the lowest cost-per-location bid. In such cases as allowed by the Policy Notice, an applicant could receive additional points based on the speed of the network, other technical capabilities, and whether it had previously submitted a Main Round application. MBO did not have any applications within this threshold that required Montana to use secondary scoring.

Programmatic Review and Negotiation was the third stage of the Benefit of the Bargain Round.

Subject matter expert reviewers assessed the following sections for compliance with the revised BEAD requirements, as outlined in the Restructuring Policy Notice: Financial, Organizational, and Managerial Capacity; and the Project Plan. Reviewers determined whether each applicant's responses were compliant or non-compliant. If a response was deemed non-compliant or insufficient, a curing request was issued for the corresponding question.

Financial reviewers used audited financial statements, the business plan, and other related analyses to model financial performance in the next five years and evaluate the applicant organization's financial capacity and sustainability. Montana used a risk-based approach to review financial capability. Factors that impact risk include a) the number of applications submitted, b) the applicant's corporate structure, c) financial reporting, d) historical financial performance, and e) the applicant's total planned capital expenditures and financial leverage.

Programmatic reviewers ensured that applicants provided essential organizational and managerial documentation and certifications for their broadband project proposals. They reviewed these materials for alignment with the requirements of the BEAD Benefit of the Bargain Round Application Guide, BEAD NOFO, and industry best practices.

Engineering reviewers reviewed all components of the applicant's project plans, which were required to be certified by a Professional Engineer. The review ensured that the certified materials sufficiently addressed all technical components required by MBO as outlined in the application.

The goal of the negotiation process for this round was to obtain the most cost-effective application while ensuring full BEAD coverage across the state. During the initial priority status review, MBO identified locations for which no application was received. MBO first discussed with the Priority applicants whether those applicants would be able to expand their projects to serve additional locations. MBO then discussed with non-Priority applicants whether they would expand their projects to consider additional locations. As a result of this process, all locations were served through Priority or non-Priority applications.

Preliminary Selection was the fourth stage of the Benefit of the Bargain Round. MBO reviewed each application, identified service for each eligible BSL, and determined preliminary selections of applications to be funded.

1.2 Fair, Open, And Competitive Process

***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 BEAD program implementation and restructuring, MBO has ensured a fair, open, and competitive process. MBO did not limit participation in the program and encouraged widespread participation by providers of all kinds. MBO leveraged the Communications Advisory Commission (CAC), multifaceted outreach and stakeholder engagement, and expert third-party reviewers to ensure a fair and transparent public process.

Communication Advisory Committee

The IJJA Communication Advisory Commission was created by SB 531 to oversee Montana's Infrastructure Investment and Jobs Act (IJJA) dollars as well as the application process for Internet providers. This Commission is made up of elected officials who provide a unique platform for citizens to interact directly with the BEAD process and the MBO. In the spirit of transparency, MBO leveraged both the state's CAC to disseminate materials (scoring rubric, application guide, templates, locations list), share updates, and provide forums for public comment and discussion. These avenues helped ensure that public input was considered and that stakeholders were kept informed throughout the process. MBO conducted over 10 public presentations to the Communications Advisory Commission during the course of Subgrantee Selection.

Outreach and Stakeholder Engagement

MBO widely communicated the Subgrantee Selection process—along with any updates or reminders—through multiple channels, including an extensive stakeholder email list, frequent updates to the ConnectMT website (<https://connectmt.mt.gov/IJJA/>), public webinars, and the Communications Advisory Commission (CAC).

During the initial Map Challenge Process, nonprofits, internet service providers (ISPs), and local and Tribal governments were invited to submit challenges to the broadband map and to attend informational webinars about the Challenge Process. This open forum allowed a diverse group of stakeholders to participate and provide feedback, ensuring broad engagement.

As required by the BEAD Restructuring Notice in June 2025, MBO held an Unlicensed Fixed Wireless (ULFW) Challenge Process. MBO posted notice of this process to the ConnectMT website and through its expansive email list on June 13, 2025. Providers were allowed 7 days to indicate intent to submit evidence for this challenge, and an additional 7 days to submit documentation.

MBO did not communicate individually with applicants regarding the BEAD program or their specific applications at any point prior to the negotiation phase, unless a question was submitted through the ConnectMT mailbox, raised during a facilitated webinar, or posed as a result of a curing request. All technical assistance and application-specific questions were encouraged to be submitted through the ConnectMT mailbox and were responded to promptly. All questions received were answered publicly and added to a Frequently Asked Questions (FAQ) document (<https://connectmt.mt.gov/IJJA/FAQ>), which was routinely updated and posted on the ConnectMT website. This policy was enacted to ensure fairness, prevent any perception of preferential treatment, and maintain consistent messaging for all applicants.

To ensure an open and accessible process, MBO published all application resource materials on the publicly available ConnectMT website. This ensured that all interested parties had equal access to the

information needed to participate. The ConnectMT website served as a central repository for applicants. All BEAD Prequalification, Main Round, and Benefit of the Bargain Round application materials (e.g., draft grant agreement, user guides, templates) were made publicly available, along with recordings of previously held technical assistance and informational webinars.

Before the Main Round application deadline on October 31, 2024, MBO conducted 29 technical assistance webinars to support applicants in submitting their Prequalification and/or Main Round applications. MBO also hosted 5 additional technical assistance and update webinars for the Benefit of the Bargain Round. These recorded webinars provided an overview of program guidance, reviewed the program timeline, and included time for applicants to ask questions.

Reviewer Qualifications

MBO engaged two independent third-party firms hired through a competitive procurement process via the DOA State Procurement Services Division. Both contractors were found to be free from any conflicts with prospective applicants, to conduct webinars, and to score applications. These firms had expert knowledge of BEAD program requirements and played a key role in facilitating objective, informed, and impartial technical assistance sessions.

MBO also relied on experienced reviewers from these contractors during both the Intake & Completeness Review and the Programmatic Review. These reviewers were trained in BEAD program requirements to ensure a high-quality, thorough assessment of each application. Network engineering experts from these firms evaluated the completeness and accuracy of project plans, while financial subject matter experts assessed applicants' financial documentation during the prequalification, Main Round, and Benefit of the Bargain application phases.

Fair and Open Process

MBO did not place a cap on the number of applications submitted for either the prequalification, Main Round, or Benefit of the Bargain phases. This decision reinforced the principle of equal opportunity and avoided any perception of unfair advantages or restrictive access. During both the Intake & Completeness Review and the Programmatic Review, all applicants were given an equal opportunity to cure defects identified in their applications. Each applicant was provided with the same amount of time to address deficiencies, reinforcing the integrity and uniformity of the process.

1.3 Method And Mechanism for Application Solicitation

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. If there was a divergence, explain how the process that was conducted diverged from the approved process.

MBO affirms that when no application was initially received to serve a location or a group of unserved or underserved locations, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal Volume II and in alignment with the BEAD Restructuring Policy Notice.

1.4 Eligible CAI List

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.

MBO reviewed the eligible CAI list in accordance with Section 4 of the BEAD Restructuring Policy Notice and subsequent guidance from NTIA. Specifically, MBO reviewed the eligibility of Type C CAIs

to validate they met the definition provided by NTIA prior to inclusion any preliminary awards.

1.5 Subgrantee Record Retention

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. MBO certifies compliance that it 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.

3. TIMELINE FOR IMPLEMENTATION (REQUIREMENT 3)

3.1 Timeline For Providing Services, Completion of Subgrant Activities and BEAD Grant Activities

Text Box: Has 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 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.*

By following and abiding by the processes and procedures outlined in MBO's IPV2, monitoring and oversight plan, and accountability plan:

- MBO affirms that each BEAD subgrantee will begin to provide services to customers who desire broadband service within the project area no later than four years after the date on which the subgrantee receives the subgrant.
- MBO affirms that all BEAD-funded subgrant activities will be completed at least 120 days prior to the end of MBO's period of performance, in accordance with 2 C.F.R. 200.344. MBO has included in the submission of this Final Proposal the program monitoring plan and supplemental agency policy documentation that outlines the reimbursement process to assist in satisfying this requirement.
- MBO affirms that all programmatic BEAD grant activities will be completed by the end of the period of performance in accordance with 2 C.F.R. 200.344.

4. OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4)

4.1 Public Waste, Fraud, and Abuse Hotline

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. MBO certifies compliance that the contact information for the State of Montana fraud hotline can be found on the public website: [Fraud Hotline - Montana State Legislature](#). The Legislative Audit Division manages the fraud, waste and abuse hotline on behalf of all state entities per 5-13-311 MCA.

4.2 Program Monitoring Plan and Reporting Mandates

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

MBO program monitoring plan and agency policy documentation is posted on the ConnectMT website and is attached.

4.3 Subgrant Agreement Conditions

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 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;

- 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. MBO certifies that the subgrant agreements include, at a minimum, the above outlined conditions (a) through (g) as required by NTIA.

5. LOCAL COORDINATION (REQUIREMENT 5)

5.1 Public Comment Period

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.

As outlined in the Final Proposal guidance, MBO posted the Final Proposal narrative, accompanying attachments, and applicable CSV files on the [ConnectMT website](#) for public comment on August 22, 2025, and it remained open for a 7-day comment period. Announcement of the public comment period was made through Montana’s public comment calendar. MBO also facilitated a CAC Meeting on August 26, 2025, providing a public comment opportunity. Comments were provided by email until the closure of the public comment period on August 29, 2025.

In addition to the public comments received during the CAC meeting, the Montana Broadband Office (MBO) received a total of 12 public comments in response to the publication of the state’s BEAD Final Proposal. The feedback received provided valuable insights into various components of the Final Proposal. The following details key themes or comments received and the steps MBO took, if any, to address via updates to the Final Proposal.

Data Discrepancies

As part of the public comment process, stakeholders had the opportunity to review the data files that are included as part of the Final Proposal submission. Stakeholders noted some discrepancies in the fp_deployment csv file. MBO reviewed these discrepancies and made the appropriate adjustments in the final submission.

Utilization of Remaining BEAD Funds

Stakeholders noted that the State has not utilized its full allocation for deployment projects and provided recommendations for additional uses to bridge the digital divide in Montana. MBO acknowledges that the full allocation has not been utilized and awaits further guidance from NTIA.

Maximizing Fiber Infrastructure and Investment in Montana

Stakeholders expressed support for maximizing fiber infrastructure and investment in Montana. MBO believes the technology mix represented by the provisionally selected awardees prioritizes the needs of every Montanan.

Efficient Use of BEAD Funds

Stakeholders expressed concern that the provisionally selected projects do not reflect the most efficient use of BEAD funds. MBO believes the technology mix represented by the provisionally selected awardees prioritizes the needs of every Montanan.

Concerns About Potential Overbuild

Stakeholders noted that due to the delay between the initial Challenge Process (spring of 2024) and

Benefit of the Bargain Round (summer of 2025), there is the possibility for significant overbuild in the State. They note there could be up to 20,000 locations that were eligible based on the initial Challenge Process, but show as having eligible service on the most recent FCC map. These locations would be considered ineligible for BEAD funding as they are indicated as “already served by privately funded networks, based on the latest availability data from the Broadband Data Collection system (NTIA Reason Code 5).” Stakeholders feel it is crucial for the NTIA to ensure that every such location is verifiably unserved or underserved before subaward approval.

MBO acknowledges that the originally approved list may not accurately reflect the true status of every BSL in the State. Accordingly, MBO took every effort to align the Benefit of the Bargain Round with the guidance provided in the BEAD Restructuring Policy Notice. Specifically in footnote 44, where state broadband offices were instructed to remove locations that are already served by non-subsidized service “wherever possible.”

The time limitation imposed in the Policy Notice made it impossible for MBO to run a new Challenge Process. Thus, MBO opted to allow applications to provide evidence supporting the removal of locations for Reason Code 5 in their applications, regardless of whether those locations were within their proposed project areas. In noting a location with Reason Code 5 for not being served through any BEAD project, MBO needed to have the following evidence:

- Evidence of subscription (service record)
- Photographic evidence of infrastructure
- Network diagram
- Speed test
- Attestation from the provisional awardee that it concurs to not accept a BEAD project for the location(s).

In cases where MBO did not receive sufficient evidence that a location should be removed from the BEAD eligibility list, MBO was forced to accept applications for these BSLs. Based on the information received during the Benefit of the Bargain Round, MBO determined which locations remained eligible and selected provisional awardees to meet the NTIA-mandated full coverage in the State.

MBO thanks all commenters for their feedback and contributions to the BEAD process. The input received has been instrumental in expanding broadband across the state.

6. CHALLENGE PROCESS RESULTS (REQUIREMENT 6)

6.1 BEAD Challenge Process Approval Confirmation

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

Yes. MBO certifies compliance that MBO has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

6.2 Final Location Classifications

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.

All final location classifications and Final Proposal materials are made available on the [ConnectMT website](#).

MBO posted its initial Final Location Classifications on October 10, 2024.

Post-Challenge Locations - https://connectmt.mt.gov/_files/post_challenge_locations.csv

Post-Challenge CAIs - https://connectmt.mt.gov/_files/post_challenge_cai1.csv

Initial Proposal Correction Data was posted on July 11, 2025.

Locations List - [MT-BEAD-Locations-List-Template-20250707.xlsx](#)

7. UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7)

Coverage of Unserved Locations

7.1 Broadband Service Coverage to Unserved Locations

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. MBO certifies compliance that it ensured coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process.

7.2 Broadband Service Coverage to Unserved Locations

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. MBO certifies compliance that it ensured coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process.

7.3 Broadband Service Coverage to Unserved Locations

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.

Coverage of Underserved Locations

7.4 Broadband Service Coverage to Underserved Locations to Underserved Locations

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. MBO certifies compliance that it ensured coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process.

7.5 Broadband Service Coverage to Underserved Locations

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. MBO certifies compliance that it ensured coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process.

7.6 Broadband Service Coverage to Underserved Locations

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 Reason Codes

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 NTIA | 35 documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.*

Yes. MBO certifies compliance to Q 7.7 and that provided reason codes were utilized to invest and account for locations that do not require BEAD funding.

7.10 Enforceable Commitments

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. MBO certifies compliance that it has accounted for all enforceable commitments after the submission of its challenge results.

11. IMPLEMENTATION STATUS OF PLANS (REQUIREMENT 11)

11.1 Cost And Barrier Reduction

***Text Box:** Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.*

In Progress.

11.2 Labor Activities

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

Yes. MBO affirms that subgrantees were required to certify compliance with existing federal labor and employment laws.

11.3 Labor Activities (Conditional)

***(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. MBO affirms that subgrantees were required to certify compliance with existing federal labor and employment laws.

11.4 Low-Cost Broadband Service

***Question (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. MBO certifies that all subgrantees selected were 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.

11.5 Low-Cost Broadband Service (Optional)

***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. MBO certifies that all subgrantees selected were 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.

11.6 Reliability And Resilience Of Bead-Funded Networks

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

Yes. MBO certifies that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

11.7 Reliability And Resilience of Bead-Funded Networks (Conditional)

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

12. SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS (REQUIREMENT 12)

12.1 Applying Priority Project Definition

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

Per the BEAD Restructuring Policy Notice, the definition of a “Priority Broadband Project” was restored to the statutory definition provided in the IIJA. MBO took a technology-neutral approach to determining Priority and Non-Priority projects. Any technology type was eligible to be considered a Priority project in MBO’s Benefit of the Bargain Round, provided the following requirements were met. The term “Priority Broadband Project” referred to a project that delivered broadband service with download speeds of at least 100 megabits per second and upload speeds of at least 20 megabits per second; had latency less than or equal to 100 milliseconds; and could easily scale speeds over time to meet the evolving connectivity needs of households and businesses, including support for 5G, successor wireless technologies, and other advanced services.

A “Non-Priority Project” referred to a proposal that offered service at or above 100/20 Mbps and latency less than or equal to 100 milliseconds but did not necessarily meet the statutory scalability requirements outlined in 47 U.S.C. § 1702(a)(2)(I)(ii).

MBO used a methodology for engineering review that is designed to align with NTIA’s Policy Notice and FAQ, which require that states “establish a review methodology that addresses each component of the statutory definition of a Priority Broadband Project and that can be fairly applied to assess all proposed projects that request Priority Broadband Project Status.”

The methodology is designed to ensure a project-by-project, area-by-area determination that enables every applicant to demonstrate that its proposed project meets the Priority requirements for the specific geographic area for which that project is proposed, as directed by the FAQ, which states that “an Eligible Entity may determine that an applicant with several project proposals across the state may not merit Priority Broadband Project status for all proposals if a proposed technical capability showing is not sufficiently tailored to a given project area.”

The methodology enables fair consideration of all applications, regardless of the technology type proposed, to allow for informed, data-driven determination of whether a given project is capable of meeting the Priority Broadband Project definition.

The methodology relies on data provided directly by the applicant and does not rely on outside studies or third-party data.

The following elements were required to be considered priority:

- Detailed Description of Applicable Network Components
 - Logical network diagram, access layer, headend & internet backbone connectivity, reliability & quality of service, customer premises equipment, tower locations, uplink/downlink throughput, gateway infrastructure & satellite uplinks
- Capacity Performance Calculations
 - A minimum of 100 Mbps download and 20 Mbps upload
 - ≤ 100 ms roundtrip latency
 - Simultaneous 5 Mbps to all connected locations, including BEAD and non-BEAD users

- Scalability Performance Calculations
 - Ability to meet performance targets five years after initial deployment, assuming a 25% annual increase in capacity demand.
- Support for 5G and Advanced Services Calculations
 - Ability to deliver at least 300 Mbps download and 30 Mbps upload capacity to each of three distinct locations within the proposed project area (totaling 900/90 Mbps aggregate capacity)
 - Maintain roundtrip latency no greater than 100 ms on each of these links

13. SUBGRANTEE SELECTION CERTIFICATION (REQUIREMENT 13)

13.1 Summary of the Range of Commitments

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.

Proposals for “Priority Broadband” projects were evaluated against the revised Priority Broadband definition outlined in the BEAD Restructuring Policy Notice, on a per-project basis. Any technology type was eligible to be considered a Priority project. In addition, the project area criteria, such as location density, provider capacity, and scalability, were also assessed. Applicants were required to submit completed Evidence of Priority Project forms as part of the Benefit of the Bargain Round. MBO only utilized the information submitted when evaluating applications to make the priority determination.

Applications were scored according to the updated criteria in the BEAD Restructuring Policy Notice and the scoring rubric approved by the state of Montana’s Communications Advisory Committee on June 25, 2025. MBO did not have any applications within this threshold that required Montana to use secondary scoring.

Project proposals were evaluated based on the minimal BEAD Program outlay criterion, emphasizing the lowest overall cost to the program. The minimal BEAD program outlay was calculated by subtracting the applicant’s proposed match from the total project cost and assessing the cost-efficiency per location, specifically, the total BEAD funding required divided by the number of Broadband Serviceable Locations (BSLs) served.

If multiple applications were received for the same general project area and total project costs for an application were within 15% of the lowest cost per BSL bid, that application was evaluated according to the secondary scoring criteria described in the BEAD Restructuring Policy Notice.

Proposals were assessed on technical performance, including network speed, latency, and future scalability, and scored by the following rubric:

Download	Upload	Points
≥ 2 Gbps	≥ 2 Gbps	50
≥ 1 Gbps to < 2 Gbps	≥ 1 Gbps to < 2 Gbps	40
≥ 500 Mbps to < 1Gbps	≥ 500 Mbps to <1 Gbps	30
≥ 100 Mbps to < 500 Mbps	≥ 100 Mbps to < 500 Mbps	20
≥100 Mbps	< 100 Mbps	10

Finally, consideration was also given to whether the applicant was previously identified as a preliminary or provisional subgrantee. Applicants were eligible to receive 50 points for this secondary criterion.

14. ENVIRONMENTAL AND HISTORIC PRESERVATION DOCUMENTATION (REQUIREMENT 14)

14.1 Environmental and Historic Preservation (EHP) Requirements

***Attachment (Required):** Submit a document that 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.*

MBO has attached a document that addresses Environmental and Historic Preservation (EHP) requirements.

15. CONSENT FROM TRIBAL ENTITIES (REQUIREMENT 15)

15.1 Resolution of Consent

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.

MBO selected five applications proposing service to broadband serviceable locations on federally recognized Tribal Land. At this time, the state has not uploaded any validated Resolutions of Consent from Tribal Governments for broadband deployment projects on federally recognized Tribal Lands. The state understands the requirement to provide these Resolutions before subgrantee agreements are signed for such projects and affirms its commitment to obtaining signed Resolutions of Consent prior to finalizing any awards. Currently, MBO is working with all five subgrantees and the Governor's Director of Tribal Relations Misty Kuhl to ensure compliance with this requirement.

16. PROHIBITION ON EXCLUDING PROVIDER TYPES (REQUIREMENT 16)

16.1 Exclusion of Provider Types

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. MBO certifies 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).

17. WAIVERS

17.1 Approved/In Process Waivers

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

Not applicable.

17.2 Waiver Request Form

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.