



BEAD Final Proposal

Utah Broadband Center

Table of Contents

Executive Summary	2
Final Proposal Data Submission	3
Requirement 1: Subgrantee Selection Process Outcomes	4
Requirement 3: Timeline For Implementation	8
Requirement 4: Oversight and Accountability Process	9
Requirement 5: Local Coordination	10
Requirement 6: Challenge Process Results	11
Requirement 7: Unserved/Underserved Locations	12
Requirement 11: Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience – Implementation of Key Plans	13
Requirement 12: Substantiation of Priority Broadband Projects	15
Requirement 13: Subgrantee Selection Certification	19
Requirement 14: Environmental and Historic Preservation (EHP) Documentation	20
Requirement 15: Consent From Tribal Entities	21
Requirement 16: Prohibition on Excluding Provider Types	21
Waivers	21

Executive Summary

The Utah Broadband Center (UBC) submits this Final Proposal to the National Telecommunications and Information Administration (NTIA) under the Broadband Equity, Access, and Deployment (BEAD) Program. Building on the foundation laid in Initial Proposal Volumes I and II and revised in accordance with the BEAD Restructuring Policy Notice (June 6, 2025), this proposal represents Utah's comprehensive plan for implementation and long-term stewardship of BEAD funds.

This Final Proposal reflects the outcomes of Utah's thorough subgrantee selection process and demonstrates the state's readiness to move into deployment. Through Utah's Benefit of the Bargain (BoB) round, the competitive award process was finalized to ensure that all awards align with BEAD's statutory requirements, prioritize serving unserved and underserved broadband serviceable locations (BSLs), and maximize the efficient use of federal funding. UBC's approach emphasizes transparency, fairness, and fiscal responsibility, ensuring that BEAD investments are deployed where they are most needed while leveraging additional resources to extend impact.

Utah's implementation framework positions the state to deliver not only physical broadband infrastructure, but also the operational, financial, and compliance structures necessary to sustain it. This includes establishing clear monitoring and oversight mechanisms, ensuring adherence to federal and state regulatory requirements, and providing pathways for meaningful community engagement throughout project implementation. The networks funded under this Final Proposal will be designed to meet or exceed the technical and performance standards outlined in the BEAD NOFO and NTIA guidance, ensuring reliability, scalability, and resilience for decades to come.

In sum, this proposal reflects Utah's commitment to closing the digital divide by building future-ready and financially sustainable broadband networks. Through careful planning, stakeholder collaboration, and prudent investment of BEAD resources, Utah is well-prepared to achieve universal connectivity, ensuring that all residents, businesses, and community anchor institutions can fully participate in the digital economy.

Final Proposal Data Submission

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

See Exhibit A - Subgrantees

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

See Exhibit B – Deployment Projects

0.3 Attachment (Required): Complete and submit the Locations CSV file (named “fp_locations.csv”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See Exhibit C - Locations

0.4 Attachment (Required): Complete and submit the No BEAD Locations CSV file (named “fp_no_BEAD_locations.csv”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See Exhibit D- No BEAD Locations

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): Complete and submit the CAIs CSV file (named “fp_cai.csv”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible

Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity's Challenge Process results

See Exhibit E- CAIs

Requirement 1: Subgrantee Selection Process Outcomes

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

Utah's subgrantee selection process for BEAD deployment projects was conducted in alignment with the procedures outlined in its NTIA-approved Initial Proposal Volume II and updated pursuant to the BEAD Restructuring Policy Notice issued on June 6, 2025. The Utah Broadband Center (UBC) initially created Utah Project Funding Areas (UPFAs) to group eligible broadband serviceable locations (BSLs) based on geography, terrain, prior applicant interest, and cost-efficiency considerations.

During Round 1 of the application period, eligible applicants submitted a pre-application that included information about the organization, its experience with broadband deployment projects, and overall eligibility for this program. The information submitted in this preapplication was evaluated for risk by reviewers to determine whether an applicant was low, medium, or high risk. Applicants who were deemed qualified during this initial review were invited to submit proposals on a UPFA basis, which were scored using a rubric approved in Utah's Initial Proposal Volume 2. This rubric prioritized technical capability, financial sustainability, and alignment with statutory broadband goals. Applicants were required to provide basic information about their organization, along with detailed network designs and budgets for each Unserved/Underserved Project Funding Area (UPFA) they proposed.

The Utah Broadband Center was reviewing Round 1 applications and preparing to launch Round 2 of the application period when the BEAD Restructuring Policy Notice was released.

In response to the BEAD Restructuring Policy Notice, Utah launched the "Benefit of the Bargain" round to reopen and complete the subgrantee selection process with modifications, including:

- **Priority Broadband Technology**

Utah adopted NTIA's requirement to prioritize selection based first on the priority technology to guarantee service that met speed, latency, reliability, consistency in

quality of service and ensure that the built network 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 unless it would incur excessive costs.

- **Primary Selection Criteria:**

Utah adopted NTIA's requirement to prioritize selection based on the lowest BEAD program outlay per location. Total BEAD subsidy per BSL became the primary criterion for all awards.

- **Use of Secondary Scoring Criteria:** For applications within 15% of the lowest BEAD cost per location in the same UPFA, secondary scoring criteria were used to break ties. These included:
 - Speed to deployment, based on evidence of readiness
 - Speed and technical capacity of the proposed network
 - Previously identified preliminary/provisional subgrantees
- **Scoring Revisions:** The updated scoring rubric removed categories such as open access, workforce development, affordability, and Tribal/local coordination from scoring. These elements were no longer required or scored under NTIA policy and were replaced with attestation-based compliance or streamlined checks.
- **High-Cost Location Flexibility:** Applicants were allowed to identify extremely high-cost BSLs for potential exclusion from proposals. Such exclusions required justification and were reviewed by UBC.
- **Pro-Forma Updates:** All applicants were required to submit or update financial pro-formas reflecting consolidated cash flow, revenue expectations, and assumptions tied to proposed UPFAs.

The application structure was refined into two parts: one covering general applicant qualifications, and a second part tailored to each UPFA with project-specific budgets and system designs. UBC ensured all eligible prospective subgrantees were able to apply and that no provider type was excluded in compliance with 47 U.S.C. §1702(a)(1).

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.

The Utah Broadband Center (UBC) designed and administered the Benefit of the Bargain (BoB) subgrantee selection process to ensure it was fair, open, transparent, and competitive. The process was conducted in compliance with Utah procurement

policies, 2 CFR Part 200 (Uniform Guidance), and the BEAD Restructuring Policy Notice. The selection process was uniform across all applications and included the following steps:

1. Pre-Application
2. Application Submission
3. Application Review & Scoring
4. Award Review
5. Award Announcement

All potential applicants were asked to submit a pre-application, which was used to verify eligibility. All organizations that submitted a pre-application were given the opportunity to cure any items that could potentially disqualify them from applying. Similarly, once the application period had closed, each application underwent a thorough review for completeness and scoring.

Training and review tools were provided to all reviewers. Reviewers were provided a synchronous virtual training session, which was recorded and made available for asynchronous viewing. Reviewers were also given a reference guide to ensure that reviews were carried out according to standard review procedures.

The completeness review team consisted of UBC staff members and members of the consulting team. The completeness team's role was to review the submitted materials and determine whether or not the application was complete. The completeness team reviewed each application against the criteria outlined in training materials and process guidance.

Once the reviews were complete, the review team compiled all notes into a summary memo, which was provided to the applicant. The applicant was permitted five days to cure their applications and include any missing information identified in the completeness review process.

Following the completeness review, applicants were moved into a scoring review. The scoring review team was split into Technical and Programmatic Reviewers. Technical reviewers had deep knowledge of broadband system requirements and design elements, while Programmatic Reviewers had experience in government programs and compliance.

As per Benefit of the Bargain guidelines, a scoring team reviewed all competitive applications against the three Benefit of the Bargain criteria as set by NTIA. Two separate and independent scoring reviews were conducted for each application.

A quality review was conducted during the completeness and scoring process to ensure a fair evaluation for all applicants.

Applicant Requirements to Safeguard Fairness

Applicants were required to meet strict standards of independence, accuracy, and compliance as a condition of participation in the BoB round. Specific safeguards included:

- **Conflict of Interest Disclosure Certification:** Applicants were required to certify that they had no undisclosed affiliations or conflicts of interest with other applicants
- **Anti-Collusion Certification:** Each application included an attestation that the submission was developed independently and without collusion with competing applicants
- **Accuracy and Compliance Certification:** Applicants certified that all information provided was accurate and in compliance with federal, state, and program requirements
- **Tribal Consent Requirement:** For projects located within Tribal Nation boundaries, applicants were required to obtain a formal resolution of consent from the relevant Tribal government before being eligible for an award

Internal Controls and Oversight

Confidentiality protections under Utah Code Section 63G-2-101 et seq (Government Records Access and Management Act, or GRAMA), and standardized submission formats through UBC's grant portal ensured consistency, transparency, and accountability in the evaluation process. Applicants were required to certify to specific statements, which created enforceable safeguards against collusion, bias, arbitrary decisions, or other actions that might undermine confidence in the grant application process.

Through these requirements, UBC ensured that the Benefit of the Bargain round reflected the principles of fairness, transparency, and accountability, consistent with NTIA's expectations for a fair, open, and competitive process under BEAD.

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

The Utah Broadband Center (UBC) affirms that for unserved or underserved locations where no applications were submitted during the initial funding round, UBC relied on the process described in its NTIA-approved Initial Proposal Volume 2 (IPv2), Section 02.04.02, as updated by the June 6 BEAD Restructuring Policy Notice (RPN). Under this framework, UBC applied a two-stage approach consisting of an Initial Cycle and a Negotiation Cycle. Through both stages, UBC focused on funding Priority Broadband Projects, as defined in Section 12.1 of this Final Proposal. The evaluation rubric and subgrantee selection process for these locations was the same as for all other BEAD-eligible locations.

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 Utah Broadband Center (UBC) revised its list of eligible Community Anchor Institutions (CAIs) for the Benefit of the Bargain Round (BoB) to conform with Section 4 ("Optimizing BEAD Locations") of the BEAD Restructuring Policy Notice (RPN). Specifically, UBC removed locations designated under the expansive "C" category definition as approved in Volume 1 of UBC's initial proposal. UBC removed these locations to ensure only those meeting the statutory CAI definition in the Infrastructure Investment and Jobs Act (IIJA), 47 U.S.C. § 1702(a)(2)(E), were retained. In addition, upon receipt of NTIA's list of CAI locations deemed ineligible for BEAD, UBC removed those locations from further consideration. Following the Broadband Restructuring Policy Notice, a revised CAI list was reposted on the Utah Broadband Center's public website. As Community Anchor Institution (CAI) coverage was optional under UBC's application process, no revisions to the application process were necessary.

1.5 Question (Y/N): Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

Yes

Requirement 3: Timeline For Implementation

3.1 Text Box: Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

The Utah Broadband Center (UBC), consistent with 47 U.S.C. § 1702(g)(2)(A), the BEAD NOFO, Utah's NTIA-approved IPv2, the Benefit of the Bargain BIG BEAD Application Guide Addendum 1, and the BEAD Restructuring Policy Notice (RPN), required applicants to demonstrate both readiness and capacity to complete broadband deployment on time and within scope. As a condition of participation, applicants were required to certify that they will begin providing service to all customers within their Utah Project Funding Area (UPFA) who request it no later than four (4) years from the date of the executed subgrant agreement. UBC further requires that all BEAD-funded activities be completed at least 120 days before the end of UBC's period of performance, providing sufficient time for final review and grant closeout.

Applicants were required to submit detailed construction schedules, milestone tracking tables, and capital investment plans that demonstrated full build-out and service activation within the four-year window for each project. Applicants were also asked to provide supporting documentation—such as right-of-way approvals, permits in process, preliminary engineering designs, or equipment inventories—to substantiate their “speed to deployment” commitments. All technical materials will be required to be certified by a professional engineer, verifying that the network design can deliver qualifying broadband service (100/20 Mbps with ≤ 100 ms latency) to every BEAD-eligible location in the proposed UPFA. The professional engineer must further attest to the applicant's technical qualifications to complete construction and sustain operations throughout the award period.

After awards are executed, UBC will monitor compliance through its BEAD Monitoring and Compliance Plan. Subgrantees will be required to submit quarterly reports tied to reimbursement requests, with funding contingent on the completion of verified milestones. UBC will actively review progress against the approved timeline, provide

technical assistance as needed, and engage regularly with subgrantees to resolve delays. Through this layered oversight approach, UBC will ensure that all BEAD-funded projects are completed on schedule, and that all subgrant activities conclude no later than 120 days before the end of Utah's overall BEAD performance period, as required by 2 C.F.R. § 200.344.

Requirement 4: Oversight and Accountability Process

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

1. See Exhibit F- BEAD Program Monitoring Plan

2. See Exhibit G – Subgrantee Agreement Draft

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

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;

- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

Yes

Requirement 5: Local Coordination

5.1 Text Box: Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed the comments.

The response must demonstrate Eligible Entity met the following requirements:

- a. The public comment period was no less than 7 days; and
- b. Political subdivisions were afforded an opportunity to submit comments during the comment period.

The Utah Broadband Center (UBC) conducted a public comment period for its Final Proposal in accordance with NTIA requirements. The Final Proposal was posted on UBC's official website (connecting.utah.gov) from September 26, 2025 through October 2, 2025. Notice of the comment period was distributed through statewide email lists, broadband stakeholder meetings, and direct outreach to broadband providers, Tribal

Nations, and counties and municipalities. This ensured that all interested stakeholders had an opportunity to review the Final Proposal and provide feedback.

Once the public comment period concludes, UBC will prepare and publish a high-level summary of the comments received. UBC will also document how comments were reviewed and identify where feedback directly influenced revisions to the Final Proposal, as applicable, while ensuring all updates remain consistent with NTIA guidance and federal program requirements.

Requirement 6: Challenge Process Results

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

Yes

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

UBC published the challenge data publicly at <https://business.utah.gov/broadband/grants/> on December 10, 2024. After UBC's transition from the Governor's Office of Economic Opportunity to the Utah Department of Transportation, the data was transferred to <https://connecting.utah.gov/grants/big/> on Monday July 7, 2025.

Requirement 7: Unserved/Underserved Locations

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

Yes

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

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 unreasonably 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 Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects

Yes

Requirement 11: Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience – Implementation of Key Plans

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.

UBC's implementation plans described in the approved Initial Proposal Volume II – Requirement 14, related to reducing costs and barriers to deployment are in progress.

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

Yes

11.3 Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.2): If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.

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

Requirement 12: Substantiation of Priority Broadband Projects

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

Based on the BEAD Restructuring Notice requirements of 47 U.S.C. §1702(a)(2)(I)(ii), applicants were asked to declare the type or types of technology to be used on the location for which they were applying, whether they considered it to be priority or non-priority, and to provide the following evidence or information on how their proposed network:

- Will deliver broadband service at a minimum download speed of 100 Mbps and a minimum upload speed of 20 Mbps with no more than 100 ms of latency, with reliable and consistent service quality;
- Can easily scale speeds over time to meet the evolving connectivity needs of households and businesses;
- Can easily scale speeds over time to support the deployment of 5G, successor wireless technologies, and other advanced services.

Applicants were also asked to provide the estimated cost per BSL to increase speeds to:

- 100 Mbps download and 100 Mbps upload
- 1Gbps download and 1 Gbps upload

If low-earth orbit (LEO) satellite technology was selected as the predominant technology, the applicant was asked to provide information on how they would guarantee that capacity would be available during the 10 years of performance for their selected BSL locations.

This was followed with an attestation that their application was true and accurate.

No applicant declared their technology as anything but priority, so UBC verified the priority of the proposed technologies at each location. To meet this requirement and identify appropriate priority broadband projects, UBC performed initial technology evaluations to understand the limitations of each technology regarding scalability and support for 5G and successor wireless technologies, as well as other advanced services.

Fiber Optic Network Priority Broadband Service Analysis

First, UBC determined that fiber optic networks met the NTIA Priority Technology definition based on the ability of fiber optic technology to utilize varying laser bandwidths to provide increased speeds and capacity, the long lifespan of the major constructed infrastructure and lower cost of upgrading electronics to upgrade service.

Second, the following location factors were considered:

- Density of BSLs;
- Geographical terrain, hillside gradients, canyons, mountain valleys, and other similar topographical factors;
- Manmade and natural barriers, including railroads, canals, tree canopy and rivers

Fiber was determined to be the priority project for thick canopy, population-dense, low-terrain locations.

Because of Utah's terrain, locations that appear densely populated can actually be separated by mountain divides. An in-depth evaluation, involving a literal examination of topographical maps of some of the proposed competing priority projects, as well as the network design evaluation of the proposed engineering of competing projects, was required to verify whether fiber was considered a priority technology for the location.

Fixed wireless access (FWA) is restricted by its ability to deliver broadband service based on the radio capability, interference, the terrain line-of-sight, and obstacles, whether leaves, buildings, or mountains. To determine whether FWA was considered a priority technology for a given location, technical reviewers considered the following factors:

- Proposed bandwidth and signal-to-noise ratio (SNR)
- FWA radio frequency bands and the number of BSLs sharing the radio transmission
- "Noise" or competing radio interference that can impact an FWA transmission
- Purchased spectrum
- Potential "congestion" in the sense of more demand for bandwidth from end users
- Technological improvements (in protocols, receiver sensitivity, and transmitter adjustments with active feedback)
- Interference often from other nearby users of the electromagnetic spectrum
- Mitigation of interference
- Existing tower sites and their location whether remote or in densely populated areas
- Scalability, knowing that networks can only be scaled by installing more radios on more towers to decrease the bandwidth needs on existing equipment
- Potential line of sight (LOS) and sharp changes in terrain
- Licensed by rule spectrum
- Remote areas where buildings are less likely to impact
- Density
- Beam forming
- Inclusion of Multiple Input and Multiple Output in the network design

In a mountainous area, FWA signals may bounce off slopes, causing multipath fading, while valleys can act as a signal trap where signals are absorbed or reflected away from intended receivers.

If FWA was determined to be a priority technology for a location, reviewers then considered the advantages to FWA deployments in comparison to optical fiber networks in terms of cost and speed of deployment.

Areas more densely populated or with future growth potential were determined to not be FWA priority broadband areas. Projects in areas that are less densely populated and do not show a propensity to fast growth were determined to be FWA priority broadband projects.

When considering LEO satellite technology as a priority technology for given locations, UBC considered the number of users and building density as well as terrain variations. UBC also evaluated saturation risk for given locations, using publicly available information regarding satellite beam diameter and throughput capacity. Based on this analysis, the maximum number of LEO users that can be supported per beam at the required minimum BEAD speed of 100/20 is 194 for download and 108 for upload. UBC used 108 subscribers per beam as the limiting factor when considering LEO satellite capacity

This analysis allowed UBC to rank the feasibility of LEO broadband services to provide service to BEAD-eligible BSLs at the project funding level. LEO was identified as the priority technology for less densely populated areas, mountain tops, hogbacks, valleys, plateaus, river valleys, and other challenging locations where the cost or feasibility of providing other broadband service types would be difficult and excessively costly.

Requirement 13: Subgrantee Selection Certification

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

The Utah Broadband Center (UBC) applied the BEAD Restructuring Policy Notice's prioritization framework and scoring criteria consistently across all competitive project applications submitted under the Benefit of the Bargain (BoB) round. In alignment with 47 U.S.C. §1702 and Section 3.4 of the BEAD Restructuring Policy Notice (June 6, 2025), UBC prioritized project selection based on the Primary Criteria of minimal BEAD program outlay. This approach ensured that the combination of awarded projects resulted in the lowest overall cost to the program while still achieving deployment to all unserved and underserved Broadband Serviceable Locations (BSLs).

Where multiple applications for the same Utah Project Funding Area (UPFA) demonstrated costs within 15 percent of the lowest-cost proposal on a per-BSL basis, UBC applied the Secondary Criteria as required by Section 3.4 of the BEAD Restructuring Policy Notice. Each application was evaluated against the following elements, with weights assigned at UBC's discretion, as permitted by the Policy Notice:

- Speed to Deployment – up to 5 points: Binding commitments to complete deployment earlier than the four-year statutory requirement (47 U.S.C. §1702(h)(4)(C)) were awarded additional consideration, with supporting documentation such as rights-of-way, permits, and Tribal resolutions reviewed.
- Technical Capabilities and Network Performance – up to 45 points: Applications were scored based on speed, latency, scalability, and reliability. Higher scores were awarded to projects capable of meeting or exceeding the statutory definition of a Priority Broadband Project (47 U.S.C. §1702(a)(2)(I)) by providing symmetrical gigabit service with low latency and scalability to support future demand.
- Preliminary/Provisional Subgrantee Status – up to 50 points: Consistent with Section 3.4, Utah assigned additional weight to applications from entities previously identified as preliminary or provisional awardees to ensure continuity and timely deployment.

This scoring methodology ensured that UBC's selection process was cost-efficient, transparent, and performance-driven, consistent with the statutory framework and the Restructuring Policy's mandate to eliminate non-statutory criteria.

By grounding project selection in minimal BEAD outlay and applying only the three authorized Secondary Criteria within the 15 percent threshold, Utah's scoring approach fully complies with the requirements of the BEAD Restructuring Policy Notice while ensuring deployment of reliable, scalable, and future-ready broadband networks statewide.

Requirement 14: Environmental and Historic Preservation (EHP) Documentation

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

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National

Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/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

See Exhibit H - Environmental and Historic Preservation Documentation

Requirement 15: Consent From Tribal Entities

15.1 Attachment(s) (Required if any deployment project is on Tribal Lands): Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

See Exhibit I - Programmatic Waiver of Tribal Consent Deadline

Requirement 16: Prohibition on Excluding Provider Types

16.1 Question (Y/N): Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

Yes

Waivers

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

Not applicable

17.2 Attachment (Optional): If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again.

Not applicable