



Washington State
Department of
Commerce

INTERNET FOR ALL IN WASHINGTON

Final Proposal

Approved – 2/26/2026

Broadband Equity, Access, and Deployment Program

DRAFT BEAD FINAL PROPOSAL

Table of Contents

TABLE OF CONTENTS.....	2
KEY REPORT ABBREVIATIONS	3
DEFINITION OF KEY TERMS.....	4
MESSAGE FROM THE STATE BROADBAND OFFICE.....	8
0.FINAL PROPOSAL DATA SUBMISSION.....	9
1.SUBGRANTEE SELECTION PROCESS OUTCOMES (REQUIREMENT 1).....	10
3.TIMELINE FOR IMPLEMENTATION (REQUIREMENT 3).....	18
4.OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4).....	19
5.LOCAL COORDINATION (REQUIREMENT 5).....	29
6.CHALLENGE PROCESS RESULTS (REQUIREMENT 6).....	30
7.UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7).....	31
8.IMPLEMENTATION STATUS OF PLANS FOR COST AND BARRIER REDUCTION, COMPLIANCE WITH LABOR LAWS, LOW-COST PLANS, AND NETWORK RELIABILITY AND RESILIENCE (REQUIREMENT 11).....	33
9.SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS (REQUIREMENT 12).....	35
10.SUBGRANTEE SELECTION CERTIFICATION (REQUIREMENT 13).....	38
11.ENVIRONMENTAL AND HISTORIC PRESERVATION DOCUMENTATION (REQUIREMENT 14).....	40
12.CONSENT FROM TRIBAL ENTITIES (REQUIREMENT 15).....	47
13.REPORT OF UNSUCCESSFUL APPLICATION DUE TO ELIGIBLE ENTITY REGULATIONS (REQUIREMENT 16).....	48
14.WAIVERS.....	49
APPENDIX – LIST OF ATTACHMENTS	50

Key Report Abbreviations

ATNI	Affiliated Tribes of Northwest Indians
BABA	Build America, Buy America Act
BEAD	Broadband Equity, Access, and Deployment
BSL	Broadband Serviceable Location
CAI	Community Anchor Institution
Commerce	Washington State Department of Commerce
DSL	Digital Subscriber Line
EHP	Environmental and Historical Preservation
ESD	Washington State Employment Security Department
FCC	Federal Communications Commission
FTTH	Fiber-to-the-Home
Gbps	Gigabit per second
IPVII	Initial Proposal Volume II
ISPs	Internet Service Providers
IT	Information Technology
L&I	Washington State Department of Labor and Industries
LEO	Low Earth Orbit
Mbps	Megabit per second
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NTIA	National Telecommunications and Information Administration
NOFO	Notice of Funding Opportunity
Project Website	Internet for All in Washington website
SBCTC	Washington State Board for Community and Technical Colleges
WSBO	Washington State Broadband Office
WSDOT	Washington State Department of Transportation
Workforce Board	Washington’s Workforce Training and Education Coordinating Board

Definition of Key Terms

BEAD Restructuring Policy Notice (RPN): A formal policy update issued by the National Telecommunications and Information Administration (NTIA) on June 6, 2025, that modifies and clarifies key implementation requirements for *the Broadband Equity, Access, and Deployment (BEAD) Program*.

Benefit of the Bargain (BotB) Round: A required application round in the BEAD subgrantee selection process introduced by the BEAD Restructuring Policy Notice, issued on June 6, 2025. This round allows Eligible Entities to select subgrantee applications that may not offer the lowest cost per location but provide the greatest overall value to the BEAD Program. These selections must still represent the lowest total cost to the program and may include proposals that serve more locations, offer better long-term scalability, or align more closely with state broadband priorities. The round allows flexibility in achieving universal service goals while maintaining fiscal responsibility.

Broadband: Broadband commonly refers to high-speed Internet access that is always on and faster than traditional dial-up access. For the Federal Communications Commission (FCC), broadband capability requires consumers to have access to actual download speeds of at least 100 megabits per second (Mbps) and actual upload speeds of at least 20 Mbps.¹

Broadband Access: The availability of high-speed, reliable internet and related equipment, including having internet connections and technology at home or in community institutions.

Broadband Backbone: High-speed transmission lines that strategically link smaller high-speed internet networks across the globe.

Broadband Deployment: The development of broadband networks or infrastructure through which broadband services can be delivered.

Broadband Serviceable Location (BSL): As the FCC defines it, a BSL is a business or residential location in the United States where a mass-market fixed broadband Internet access service is, or can be, installed. Residential BSLs include all residential structures, including structures that are (or contain) housing units or group quarters (as the United States Census Bureau defines those terms). Business BSLs include all non-residential (business, government, non-profit, etc.) structures on property without residential locations, which would be expected to demand mass-market, non-enterprise-grade Internet access service.

Broadband Serviceable Location Fabric (Fabric): The Fabric is a dataset of all locations in the United States and Territories where fixed broadband internet access service is or could be installed. The Fabric allows broadband availability data filers, the FCC, and other stakeholders to work from a single, standardized list of locations for the Broadband Data Collection.²

¹ FCC (2024), [FCC Increases Broadband Speed Benchmark](#)

² NTIA (2023), "What is the Location Fabric?". [Accessed at: Broadband Data Collection Help Center](#)

Community Anchor Institutions: An entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals. (NOFO Section I.C.f)³

Dig Once: Policies and/or practices that minimize the number and scale of excavations along highway rights-of-way when installing telecommunications infrastructure.⁴

Internet Service Provider (ISP): An ISP is an organization that provides services for accessing, using, managing, or participating on the Internet. ISPs can be organized in various forms, such as commercial, community-owned, non-profit, or privately owned.

Last Mile: The technology and process of connecting the end customer's home or business to the local network provider.⁵

Middle Mile: The hard assets need to support the connection between a local network, also called a "last mile" connection, and the backbone internet connection.⁶

Priority Broadband Projects: 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 advanced services.⁷

Rights-of-Way: Rights-of-way are legal rights to pass through property owned by another. They are frequently used to secure access to land for digging trenches, deploying fiber, constructing towers, and deploying equipment on existing towers and utility poles.⁸

Subgrantee: The recipient of BEAD funding to carry out eligible activities. (NOFO Section I.C.w)⁹

Symmetrical Speeds: Internet connections capable of the same upload and download speeds, typically delivered by fiber technology.

Underserved Location: An underserved location is defined as a broadband-serviceable location that is (a) not an unserved location, and (b) that the Broadband DATA Maps show as lacking access to Reliable Broadband Service offered with - (i) a speed of not less than 100 Mbps for downloads; and (ii) a speed of not less than 20 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds. (NOFO Section I.C.bb)¹⁰

³ NTIA (2022), BEAD NOFO. Accessed at: [BEAD NOFO.pdf \(doc.gov\)](#)

⁴ Fiber Optic Sensing Association (n.d.). Why Dig Once? Accessed at: [Why Dig Once? \(regulations.gov\)](#).

⁵ NTIA (2016), Broadband Glossary. Accessed at: [BroadbandUSA: Connecting America's Communities \(doc.gov\)](#)

⁶ Ibid.

⁷ NTIA (2025), BEAD Restructuring Policy Notice. Accessed at: [BEAD Restructuring Policy Notice.pdf \(ntia.gov\)](#)

⁸ NTIA (2016), Broadband Glossary. Accessed at: [BroadbandUSA: Connecting America's Communities \(doc.gov\)](#)

⁹ NTIA (2022), BEAD NOFO. Accessed at: [BEAD NOFO.pdf \(doc.gov\)](#)

¹⁰ Ibid.

Unserved Location: An unserved location is defined as a broadband-serviceable location that the Broadband DATA Maps show as (a) having no access to broadband service, or (b) lacking access to Reliable Broadband Service offered with - (i) a speed of not less than 25 Mbps for downloads; and (ii) a speed of not less than 3 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds. *(NOFO Section I.C.dd)¹¹*

Washington State BEAD NOFO: This is the NOFO that the WSBO published to allow applicants to apply for the BEAD funding the NTIA has allocated to Washington. It is different from the BEAD NOFO. The NTIA issued the BEAD NOFO to describe the requirements under which it will award grants for the BEAD Program.

¹¹ Ibid.

Note: Each section below includes the prompt from the National Telecommunications and Information Administration (NTIA) – the federal agency administering the BEAD program – indicating the information it requests for each requirement. Although not all these prompts require a written response, the Washington State Broadband Office (WSBO) has included all prompts to provide additional context to the reader. The three types of requests include:

Attachment – The NTIA has asked the WSBO to submit a document or file to satisfy the requirement.

Check Box – The NTIA has asked the WSBO to confirm that it will comply with the requirement.

Response–The NTIA has asked the WSBO to select either ‘yes’ or ‘N/A’ as a response to a requirement.

Text Box – The NTIA has asked the WSBO to describe how it will satisfy the requirement.

MESSAGE FROM THE STATE BROADBAND OFFICE

August 25, 2025

Today the Washington State Broadband Office (WSBO) is excited to announce preliminary awards for its Broadband Equity, Access and Deployment (BEAD) program. This announcement marks a major step forward in bridging the digital divide and helping us meet our goal to bring internet access to every person across Washington State.

Over the past year, the WSBO has created a program to efficiently and cost-effectively allocate \$1.2 billion in available BEAD funding to address the broadband access needs of Washingtonians. To do this we set up a competitive application process, encouraging proposals from a diverse range of internet service providers and technology types. This process, outlined in Initial Proposal Volume II (IPVII), was refined to align with the BEAD Restructuring Policy Notice (RPN).

The results of this process speak for themselves. The WSBO is proud to report that in the most recent Benefit of the Bargain (BotB) round we received a total of 673 project applications from 37 providers, covering all 232 designated project areas. After reviewing project proposals and removing project areas that no longer had eligible locations due to existing coverage and enforceable commitments, WSBO has provisionally awarded a total of \$850,260,471 in funding to the remaining 224 project areas and 27 providers. At least one project has been awarded in each eligible project area. Based on the results of this round we are optimistic that all communities in Washington will have broadband access at the completion of this program that is affordable, reliable, scalable, and sustainable.

Washington's planned investments to expand broadband infrastructure access are integral to building a more inclusive 21st century economy by ensuring that all Washington residents and communities have the option and ability to benefit from broadband service. For this reason, we are inviting the public to provide feedback on our draft Final Proposal over the next few weeks.

We look forward to hearing from you, and please contact us if you have any questions or need assistance at InternetforAll@Commerce.wa.gov.

Sincerely,

Joseph Williams

Dr. Joseph Williams

Interim Director of the Washington State Broadband Office



0. FINAL PROPOSAL DATA SUBMISSION

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

See attachment to the [Subgrantees CSV](#) file (as submitted) or [Subgrantees CSV](#) (as approved).

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

See attachment to the [Deployment Projects CSV](#) file (as submitted) or [Deployment Projects CSV](#) (as approved).

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

See attachment to the [Locations CSV](#) (as submitted) or [Locations CSV](#) (as approved).

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

See attachment to the [No BEAD Locations CSV](#) file (as submitted) or [No BEAD Locations CSV](#) (as approved).

Question 0.5 (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.

Attachment 0.6 (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 identification of CAIs in this list must match the approved final list from the Eligible Entity’s Challenge Process results.

See attachment to the [CAI CSV](#) file (as submitted) or [CAI CSV](#) (as approved).

1. SUBGRANTEE SELECTION PROCESS OUTCOMES

(REQUIREMENT 1)

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

The Washington State Broadband Office (WSBO) has implemented a Subgrantee Selection Process that remains consistent with the framework approved in Volume II of its Initial Proposal, while also incorporating the flexibilities and updated directives outlined in the BEAD Restructuring Policy Notice (RPN) that was released on June 6, 2025. In alignment with NTIA’s revised guidance, the WSBO adjusted its evaluation criteria to prioritize cost-efficiency, scalability, and inclusion of locations that have historically been more difficult and expensive to serve. These updates were operationalized through structured review rounds, quality assurance protocols, and the integration of a new scoring rubric and application questions that reflect the evolving policy landscape and Washington’s commitment to universal broadband access. The WSBO also rescinded preliminary subgrantee selections made prior to the June 6th RPN. The Subgrantee Selection (SGS) Process detailed below describes the Benefit of the Bargain (BotB) SGS Process.

BENEFIT OF THE BARGAIN ROUND (POST-JUNE 6TH, 2025)

Pre-Subgrantee Selection Activities

Following the release of the BEAD RPN on June 6, 2025, the Washington State Broadband Office (WSBO) undertook a comprehensive update of its Broadband Serviceable Locations (BSLs) list to ensure compliance with the new federal requirements. The WSBO incorporated NTIA-provided lists of defaulted federal enforceable commitment locations and verified that these were not already served through other enforceable commitments before certifying them as unserved or underserved and adding them to the eligible BSL list. The office also implemented the required reason code process, removing locations no longer eligible due to changes in the FCC Fabric or existing service coverage. Additionally, WSBO accounted for locations served by Unlicensed Fixed Wireless (ULFW) providers by initiating a public notification and documentation process to confirm whether such locations met BEAD technical standards. These updates were reflected in revised CSV templates and ZoomGrants portal configurations, including the removal or addition of fields such as “fabric version” and “financial type subcodes.” This rigorous data refinement ensured that WSBO’s BSL list was accurate, policy-compliant, and ready for subgrantee application intake.

To ensure alignment with the updated federal guidance and to prepare for a transparent and competitive subgrantee selection process, the WSBO undertook a series of pre-selection activities. These included reviewing and interpreting the BEAD RPN, developing new Washington State BEAD NOFO guidelines, updating internal timelines, updating the review tool, and refining

evaluation criteria to reflect the revised emphasis on cost-effectiveness and universal service. WSBO also conducted refresher training for members of the Application Review Team, developed an updated evaluation process, and coordinated with subject matter experts to ensure readiness for technical and financial capability assessments.

Additionally, as part of its pre-subgrantee selection activities, the WSBO took proactive steps to ensure transparency, stakeholder readiness, and alignment with the BEAD Restructuring Policy Notice. This included publicizing a revised evaluation modeled after the framework outlined in Section 3.4 of the BEAD RPN and updating the Washington BEAD NOFO guidance accordingly. WSBO also updated the ZoomGrants application portal—modifying application questions, upload requirements, and evaluation logic to reflect the updated policy direction. To support applicants, WSBO hosted regular office hours, issued newsletter announcements, and responded directly to inquiries submitted through its dedicated broadband inbox at InternetforAll@Commerce.wa.gov. The WSBO also posted a running list of Q&A responses following office hours on the [Internet for All website](#). These efforts helped ensure that all potential subgrantees were informed and prepared to engage with the updated selection process.

These foundational efforts enabled WSBO to launch a structured and policy-compliant selection process that could adapt to evolving federal expectations and state-specific broadband priorities.

Subgrantee Selection Process

As part of its Subgrantee Selection Process (SGS), the WSBO conducted the RPN required Benefit of the Bargain (BotB) round to select provisional subgrantees. The BotB round allowed all applicants—regardless of technology employed or prior participation in the program¹²—to compete on a level playing field. All subgrantee selection conducted after the BEAD RPN's release complied with the Policy Notice's terms. Each step of the Benefit of the Bargain SGS process is detailed below.

¹² Per the BEAD Restructuring Policy Notice, Eligible Entities must rescind all preliminary and provisional subaward selections and notify applicants that a further round of applications will be considered before final awards are made.

STEP 1: APPLICATION INTAKE

Application intake included soliciting applications and providing supporting materials and guidance for potential subgrantees. All applicants were required to submit the same information in the application and meet the same robust BEAD requirement standards outlined in the Washington State BEAD NOFO evaluation description. Application intake consisted of two core activities – launching the application and assisting applicants as they completed the application through office hours and Q&As. Once the application window closed, application review commenced. The following documents were submitted as part of the opening of the application on ZoomGrants to best support applicants in understanding the application process and requirements:

- [WSBO BEAD NOFO-WSBO 25-003 \(Benefit of the Bargain Round\)](#)
- [WSBO Benefit of the Bargain Application](#)
- [WSBO Benefit of the Bargain Attachments Checklist](#)
- [WSBO BEAD Benefit of the Bargain Project Area Match](#)

STEP 2: INITIAL ELIGIBILITY, COMPLIANCE, AND COMPLETENESS REVIEW

The first step in the application review process was confirming that the applicant was eligible for BEAD funding (e.g., a broadband deployment project) and the application was complete and compliant. Applicants could not submit applications until all required fields and document uploads were completed. However, the WSBO Application Review Team did a second manual verification to confirm the correct information was submitted (e.g., the correct attachment was uploaded, etc.) and documented any anomalies (e.g., numbers submitted in the budget did not match the percentage requested for state match).

Each application received a full eligibility and completeness review. Applications that were both eligible and complete moved on to Step 3. For the Benefit of the Bargain Round, however, applicants were allowed to submit specific documents after application submittal; these documents included the Tribal Resolution (if applicable), Engineering Certification Stamp & Design, and the Letter of Intent for Line of Credit or Performance Bond Intent after the application was submitted.

STEP 3: THRESHOLD REQUIREMENTS AND SUBGRANTEE QUALIFICATIONS REVIEW

The Application Review Team then assessed applications for compliance with “gating criteria” (also known as “BEAD Subgrantee Qualifications”) to determine if the applications met minimum eligibility requirements as outlined in the BEAD NOFO. In making compliance determinations, the WSBO evaluated capabilities objectively according to a consistent Standard of Review. The qualifications covered in the application align with those outlined throughout the state’s IPVII and per [NTIA’s Subgrantee Qualifications Guidance](#).

The BEAD Subgrantee Qualifications review team consisted of WSBO team members and outside subject matter experts. Each reviewer received training on reviewing subgrantee qualification(s) and participated in regular check-ins with other team members to review progress and discuss any questions or concerns. Outside subject matter experts were brought in to assist in reviewing and evaluating qualification areas that were more technical in nature such as Priority Broadband Project determination. For example, as part of the “Financial Capability” review, subject matter experts in fraud, waste, and abuse used research tools like LexisNexis, SAM.gov, Federal and State Debarment lists, etc., to verify the applicant’s submitted credentials. Technical subject matter experts used proprietary software to verify budget assumptions with proposed plans. Each reviewer’s evaluations were verified through one or more quality assurance and quality control checks by other reviewers.

During regular group check-ins, reviewers raised applications identified as potentially having one or more “concerning characteristics” according to the Standards of Review. These “concerning characteristics” were often resolved through discussion with the broader group.

The combination of a robust set of qualified reviewers, a standard of procedures review tool, multiple team trainings and check-ins, and quality control and assurance checks allowed for a Subgrantee Qualifications Review process that was transparent, rigorous, and comprehensive, that aligned with the process documented in IPVII as modified by the BEAD RPN.

STEP 4: APPLICATION EVALUATION

The application evaluation phase described in the [Washington State BEAD Benefit of the Bargain NOFO](#) (pgs. 32-33) complies with the scoring criteria guidance in the BEAD RPN (Section 3.4). The WSBO evaluated applications in two stages: Primary Evaluation and, if needed, Secondary (Tiebreaker) Evaluation.

- **Primary Evaluation:** The WSBO first prioritized proposals that qualify as Priority Broadband Projects¹³ that meet BEAD’s highest standards for speed, latency, and reliability. Among these, WSBO selected the proposal that offers the lowest overall cost to the BEAD Program, not just the lowest cost per location. This includes factoring in the cost of any locations a proposal excludes (e.g., due to high cost) to minimize the total cost to serve the area.

WSBO reserved the right to select a proposal that was not the lowest-cost option for a given set of BSLs if the proposal resulted in cost savings across multiple project areas to reduce the overall BEAD Program cost or if there were scalability concerns for projects that applicants designated as Priority Broadband Projects. If no Priority Broadband Project proposal was available or cost-effective, WSBO considered Non-Priority Broadband¹⁴ proposals that still met BEAD’s technical requirements.

Secondary Evaluation (Tiebreakers)

¹³ As defined in the Washington State BEAD Benefit of the Bargain NOFO on page 6.

¹⁴ Ibid.

If two or more proposals for the same area were within 15% of each other in cost per location, WSBO used a step-by-step tiebreaker process with the applicant who best met the criteria being selected:

1. **Preliminary Selection Status** – Preference went to applicants selected as preliminary subgrantees in prior rounds.
2. **Technical Capability** (if still tied) – Higher average speeds averaged across all technologies and BSLs in the project area.
3. **Speed to Deployment** (if still tied) – Shortest realistic timeline to activate service.
4. **Lowest Absolute Cost** – If still tied, the proposal requesting the least BEAD funding wins.

Eleven project areas had to go through competitive tiebreakers. Of those, two were determined based on Tiebreaker 1 (Preliminary Selection Status), and two were determined based on Tiebreaker 2 (Technical Capability).

The WSBO ensured that no Application Review Team members had a conflict of interest, real or apparent, in the outcomes of the WSBO’s BEAD Subgrantee selection process or other program outcomes. Each member signed a Conflict of Interest and Confidentiality Statement. In addition, reviewers were not allowed to review applications for project areas where their residence may be eligible for internet service through BEAD as one of the serviceable locations. Reviewers also recused themselves based on conflicts of interest due to work duties or personal connections.

Like the BEAD Subgrantee Qualification review process, Application Review Team members were trained on how to carry out scoring activities and met regularly during the scoring process to discuss progress, as well as questions or concerns. Evaluation results from all reviewers were reviewed and validated for consistency to determine the final list of provisional subgrantees. This rigorous and multi-staged process allowed for high consistency, accountability, and fairness.

STEP 5: BEAD APPLICATION AWARD SELECTION

Overall, one application was disqualified in the Benefit of the Bargain Round leaving 674 applications that were reviewed and evaluated. The selection process concluded on August 21, 2025 and resulted in awards to 27 applicants covering all eligible project areas.

NTIA Review of Preliminary Subgrantee Selections

Before publicly disclosing provisional BEAD subgrantee selections, the WSBO met with the NTIA at the Special Award Condition (SAC) meeting on August 22, 2025 to review the subgrantee selection process before contacting provisionally selected subgrantees or publicly announcing the results, as required by the NTIA. To increase transparency and accountability, and in accordance with NTIA’s BEAD NOFO, the WSBO posted its Final Proposal for public comment (see [Section 6.3](#)). Official Notices of Award will only be issued after the NTIA approves the Final Proposal.

Subgrantee Selection Process Timeline

The Benefit of the Bargain (BotB) subgrantee selection process dates were as follows:

Benefit of the Bargain Round (21 days):

- Application Cycle Opens 07/02/25
- Application Cycle Closes 07/23/2025
- Application Review 07/24/2025, to 08/20/2025
- Final awards and contracts issued will be made after NTIA's approval of the final plan, and estimated to start around January 2026

The WSBO Director directly negotiated for one project area, for the Quileute Tribe BSLs. As a result of these negotiations, an additional 93 locations were claimed.

The complete list of provisional awards can be found [here](#). The approved list of awardees can be found [here](#). For some project areas, the BSLs will be awarded to two different awardees to cover the full project area.

Text Box 1.2: 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 WSBO took significant steps to ensure the subgrantee selection process was fair, open, and competitive throughout Round 1, Round 2, and the Benefit of the Bargain Round. As discussed further in detail below, these included activities such as notifying a wide variety of potential applicants via numerous platforms such as Office Hours, email subscription lists, social media, and press releases; publishing the application evaluation process and guidelines; hosting and recording training sessions for applicants; developing a standardized application review document; ensuring reviewers possessed appropriate background and training; and creating and documenting processes to safeguard against collusion, bias, conflicts of interest, arbitrary decisions, and any actions that would undermine confidence in the process.

BENEFIT OF THE BARGAIN ROUND (POST-JUNE 6TH, 2025)

For the Benefit of the Bargain round, the reviewers utilized an updated Standards of Review to align with the Revised Policy Notice (e.g., workforce and labor requirements were removed from the operational capability review). The application Review Team was made up of WSBO employees and subject matter experts. As described in detail in the response to Requirement 13, the application evaluation process was applied consistently as described under Text Box 1.1 and adhered to the guidelines published in the Revised Policy Notice.

Fairness: The WSBO published the application evaluation process in their [NOFO WSBO 25-003](#) when the Benefit of the Bargain round was opened on July 2, 2025, so all prospective

applicants had access to review and ask clarifying questions. The SoR applied consistent standards of review as a guide to ensure a fair process for all applicants when evaluating the gating criteria. The same process of review was followed for each application. This process included 1) Initial eligibility, compliance, and completeness review, 2) Threshold requirements and subgrantee qualifications review, 3) Determination of minimum BEAD outlay requested, 4) Comparison to competing proposals if the project area received more than one application. To prevent any potential conflicts of interest, reviewers signed a Conflict of Interest and Confidentiality Statement. Additionally, reviewers were not allowed to review an application where their residence was eligible for internet service through BEAD funding based on conflicts of interest due to work duties or personal connections. For more specialized reviews, such as the Financial Capability and Technical Capability threshold requirements, subject matter experts in waste, fraud, and abuse and the technical aspects of broadband deployment were consulted.

Openness: The WSBO published application guidelines that explained what was required for each section of the application and changes from prior rounds (e.g., technology-neutral). The WSBO regularly updated information on its [Internet for All Initiative – Washington State Department of Commerce](#) website with information and resources for applicants and sent out emails to all applicants from prior rounds. During bi-weekly office hours, the WSBO staff held question-and-answer (Q&A) sessions. The Q&As were documented and published on the ZoomGrants applicant portal as a running log of all questions asked to date for anyone to view.

Competitiveness: The WSBO endeavored to notify a wide variety of potential applicants through multiple platforms like the [Washington Internet for All website](#), the Internet for All email subscription list (7,000+ subscribers), and through social media platforms like [Instagram](#) (~2,300 followers) and [LinkedIn](#) (~13,000 followers). The press release for the opening of the state BEAD application cycle was published on the Department of Commerce’s contract portal, and announcements about the opening of the application were published on multiple industry websites, including [Broadband Breakfast](#), [Telecompetitor](#), and [GovDelivery](#). Prior to and after the state’s BEAD NOFO publication, the WSBO hosted four BEAD application training sessions that were recorded and posted on the Internet for All website to enable all applicants to be prepared. The WSBO also continued to host tribal office hours and general office hours for any interested parties to give all applicants the opportunity to ask clarifying questions. The results of each application round highlight the effectiveness of the WSBO’s efforts in fostering a competitive selection process: In Round 1, the WSBO received 303 applications from 37 unique applicants; in Round 2, the WSBO received 202 applications from 29 unique applicants; in the Benefit of the Bargain Round, the WSBO received 555 applications from 37 unique applicants.

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 WSBO affirms that when no application was initially received, they followed a procedure consistent with the process approved in the Initial Proposal, as modified by the BEAD Restructuring Policy Notice.

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

Not Applicable.

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.

The WSBO certifies that our office 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 three (3) years from the date of submission of the subgrantee's final expenditure report. These records will 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.

3. TIMELINE FOR IMPLEMENTATION (REQUIREMENT 3)

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

The WSBO will work with subgrantees under the NTIA's guidance to ensure that each BEAD subgrantee will begin to provide services to customers that desire broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant. Subgrantee reports on milestones will be tracked closely according to the monitoring approach described in Requirement 4. Contract Managers will stay in close contact with subgrantees providing technical assistance as needed throughout the period of performance to resolve issues in a timely manner.

The WSBO will also ensure that all BEAD-funded subgrant activities are completed at least 120 days prior to the end of the WSBO's period of performance. As part of the application process, applicants were required to submit a capital investment schedule to demonstrate a complete buildout and initiation of service within 120 days prior to four years from the date on which the entity is contracted. The WSBO also required that all technical documentation including milestones for project implementation was certified by a professional engineer. The WSBO will include mechanisms for enforcement in [subgrantee agreements](#). As described in Section 4, the WSBO will also issue corrective actions to subgrantees as needed as part of monitoring activities to prevent unnecessary delays. Enforcement mechanisms will include withholding funds until corrective actions take place or restrictions from participating in future grant-funded activities in the state.

The WSBO will also ensure that all programmatic BEAD grant activities are completed by the end of the period of performance for the BEAD award, including subgrantee reporting and accountability requirements. The WSBO will implement program management monitoring and reporting schedules and tools in addition to internal controls to support timely completion of BEAD activities within the mandated timeframes in accordance with 2 C.F.R. 200.344.

4. OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4)

Question 4.1 (Y/N): Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

Yes – The hotline is known as the Citizen Hotline. Submissions can be made [online](#), or by calling 866-902-3900.

Attachments 4.2: 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) BEAD PROGRAM MONITORING PLAN

As a steward of public funding, the WSBO is responsible for monitoring subgrantees to ensure that all Washingtonians have access to high-speed internet as promised by projects and protect against waste, fraud, or abuse of the program. The WSBO has developed processes for transparency, oversight, and accountability to ensure proper use of the grant funds under the BEAD Program and to meet timely subgrantee reporting mandates to the NTIA.

MONITORING OVERVIEW

The WSBO will make deployment awards to a variety of subgrantees, ranging from local municipalities to tribes to Public Utility Districts (PUDs) to commercial Internet Service Providers (ISPs). All will be held to a high standard of monitoring and reporting. The WSBO's plans for BEAD program monitoring are outlined in the WSBO BEAD Handbook, which will be provided to all subgrantees. Details on the BEAD program monitoring plan are as follows:

MONITORING OBJECTIVES

The objectives of monitoring are to determine if subgrantees are doing the following:

- Carrying out BEAD-funded activities in a timely manner and complying with applicable laws, regulations and terms as described in their contracts (as modified or amended), and
- Charging only eligible costs to the program or project and minimizing the opportunity for fraud, waste and mismanagement.

MONITORING APPROACH

The role of the WSBO is to ensure that subgrantees are carrying out their projects in accordance with applicable laws and regulations. In carrying out this responsibility, the WSBO will help subgrantees identify problems or potential problems in program implementation, identify the causes of problems, and help subgrantees correct them. BEAD Infrastructure Specialists (also known as “Contract Managers”) and Broadband Infrastructure and Programs Manager will be responsible for conducting monitoring throughout the contract period to assess subgrantee progress and performance. Representatives from the National Telecommunications and Information Administration (NTIA) may also conduct monitoring visits to ensure that subgrantees are carrying out their programs in accordance with the applicable laws and regulations.

The WSBO will employ a risk-based approach to monitoring, wherein the type of monitoring activities and depth of monitoring are dependent on the assigned risk level (low, medium, and high) of the subgrantee, determined by a Risk Assessment Tool and the initial risk assessment based on the risk assessment form submitted by applicants. Subgrantees’ risk profiles will be reassessed biannually and may result in adjustments to risk ratings and/or monitoring activities carried out by WSBO.

Within the first three months of contract execution, the WSBO contract managers will develop the subgrantee’s monitoring plan based on its risk level, which will be submitted to the Broadband Infrastructure and Finance Manager and the Broadband Infrastructure Programs Manager for review and approval. Medium- and high-risk subgrantees will be subject to more frequent and in-depth monitoring activities. Additional monitoring activities will be administered for medium- and high-risk subgrantees in areas where noncompliance or potential for noncompliance are identified. If there are corrective actions identified, WSBO staff will complete follow-up monitoring as needed to ensure compliance.

MONITORING ACTIVITIES & SUBGRANTEE REPORTING

As previously mentioned, the frequency and type of monitoring activities will vary according to the subgrantee’s assigned risk level, determined by a Risk Assessment Tool. The tool includes questions relating to subgrantee attributes such as pending or existing legal issues, history of timely and accurate reporting compliance with WSBO, and turnover of agency management.

There are two main categories of monitoring activities: 1) contract monitoring activities and reporting mandates, and 2) supporting activities. **Table 1** below provides an overview of the types and frequency of the activities related to monitoring, according to subgrantee risk level.

Table 1: Risk Monitoring Framework

Monitoring Type & Frequency According to Risk Level			
	Low Risk	Medium Risk	High Risk
Contract Monitoring Activities			
Document Reviews based on Monitoring Checklist	At least once every other year during each year of the Contract More frequently, as needed to support WSBO's submission for the NTIA's Semi-annual Reports (SAR)	Once per year during each year of the Contract More frequently, as needed to support WSBO's submission for the NTIA's Semi-annual Reports (SAR)	Twice per year during each year of the Contract More frequently, as needed to support WSBO's submission for the NTIA's Semi-annual Reports (SAR)
Site Visits	Not required	At least once during the contract period	At least once in the first year of contract execution, subsequent visits at the WSBO's discretion
Inspection for Final Acceptance	Once at project conclusion		
Supporting Activities			
Federal Guidance and State Policy Updates	Upon Publication		
Technical Assistance	TBD – decided based on subgrantee monitoring plan	TBD – decided based on subgrantee monitoring plan	TBD – decided based on subgrantee monitoring plan
Risk Assessment updates	Every 24 months	Every 12 months	Every 6 months

Following the award, a risk-based monitoring plan will be implemented. Subrecipients will be categorized by risk level, with higher-risk entities receiving more frequent oversight, including site visits, and targeted reviews. Monitoring will focus on financial performance, deployment progress, compliance with Build America, Buy America (BABA) provisions, and other BEAD

program obligations. Risk Assessment will be reassessed periodically whenever issues arise, such as performance delays or potential non-compliance findings.

Contract monitoring activities and reporting mandates refer to the project status reports, quarterly progress reports, document reviews, site visits, and final inspections undertaken to facilitate compliance with applicable Federal requirements. The monitoring process will establish a consistent method of identifying requirements and evaluating compliance attributes, and will be comprised of the following:

- a) *Project Status Reports*: Each subgrantee reimbursement request must be accompanied by a Project Status Report, which describes progress made on the project since the last invoice was submitted. In addition, reimbursement requests must be accompanied by source documentation of expenses and Reportable Expenses form for any request over \$1,000. Payments will not be released until the Progress Report and supporting documentation are received and approved by the WSBO. Templates of the Project Status Report [are here](#).
- b) *Quarterly Progress Reports*: Subgrantees will be required to submit quarterly projections and expenditure reports each quarter, even if no funds have been reimbursed in the quarter. Templates for the Quarterly Progress Report are included [here](#).
- c) *Document Reviews*: The WSBO will monitor BEAD subgrantees through regular document reviews. Templates for the checklists that will be used as part of the document reviews are included as Attachment 10-A, "Monitoring Checklist," in the WSBO BEAD Handbook. The checklists will incorporate information expected to be requested from subgrantees as per the [BEAD Anticipated Semi-Annual Report \(SAR\) Reporting Requirements Guidance](#).

In general, the WSBO will emphasize the following areas when conducting document reviews in accordance with applicable state and federal regulations:

- Overall project health and progress
- Subgrantee and contractor management and compliance
- Financial management
- Professional services procurement
- Construction procurement

The WSBO reserves the right to request additional information from subgrantees at any point during the BEAD subgrant to meet NTIA monitoring and performance requirements. In cases where WSBO identifies the need for additional information or has concerns, WSBO may provide technical assistance or issue corrective actions to the subgrantee.

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- d) *Site Visits, as needed:* WSBO will use site visits to verify that subgrantees are meeting their milestones. Site visits will be determined on a risk-based basis; higher-risk subgrantees will require more site visits. During these visits, the WSBO team will review and verify milestones to ensure completion. Site visits will be guided by a standardized agenda and a checklist of review items, which will be tailored to fit the issues and circumstances of each site visit. After a site visit, WSBO staff will document findings and conclusions. Where site visits identify or confirm significant issues, WSBO may specify corrective actions to be taken by the subgrantee based on observations and conclusions drawn from the site visit. WSBO may adjust monitoring levels based on a site visit.
 - e) *Inspection for Final Acceptance:* To be determined (TBD), pending NTIA's guidelines to be issued, if inspection or Final Acceptance will be required. Prior to Project Closeout (TBD), the Subgrantee will schedule a final inspection when all construction has been completed, the architect/engineer has conducted a final inspection, and any deficiencies have been corrected. The NTIA Grants Officer and WSBO must be given advance notice so that the NTIA Grants Officer may participate, if required.

Supporting activities refer to ongoing monitoring activities and additional activities undertaken to allow for responsible oversight of federal funds and ensure that performance expectations are achieved. These include notification of relevant updates to Federal guidelines or State policy, technical assistance, and updates to subgrantees' risk level based on the Risk Assessment Tool.

CORRECTIVE ACTIONS

After a monitoring activity takes place, the Contract Manager will, as needed, issue a corrective action(s) to the subgrantee. The process for identifying and issuing corrective actions as part of the monitoring process is as follows:

1. Identify
2. Document
3. Develop a corrective plan
4. Notify the subgrantee
5. Implement the corrective plan
6. Confirm resolution and documentation
7. Closeout

All corrective action communications will be in writing, have assigned deadlines for completion, and will be fully documented. Corrective courses of action form a part of the subgrantee's file. A standard template will be used to document corrective actions and will be used for consistency and uniformity across the portfolio.

SUBGRANTEE FAILURE TO COMPLY FOLLOW-UP ACTIONS

If the subgrantee fails to meet a target date for a corrective action, the WSBO will issue a formal request for a response. If the subgrantee has not responded within 30 calendar days after the corrective action date, the WSBO will withhold further payment until the subgrantee responds or implements corrective action. Failure by the subgrantee to correct deficiencies may result in the WSBO withholding funds and possible restrictions on future grants.

Termination and “clawback” provisions are incorporated into the WSBO BEAD Draft Subgrantee Contract, which all subgrantees will be required to accept as a condition of participation. Specifically, the Contract allows for:

- **SAVINGS:** In the event funding from state, federal, or other sources is withdrawn, reduced, or limited in any way after the effective date of this Contract and prior to normal completion, COMMERCE may terminate the Contract under the "Termination for Convenience" clause, without the ten-business day notice requirement. In lieu of termination, the Contract may be amended to reflect the new funding limitations and conditions.
- **TERMINATION FOR CAUSE:** In the event COMMERCE determines the Contractor has failed to comply with the conditions of this contract in a timely manner, COMMERCE has the right to suspend or terminate this contract. Before suspending or terminating the contract, COMMERCE shall notify the Contractor in writing of the need to take corrective action. If corrective action is not taken within 30 calendar days, the contract may be terminated or suspended.

In the event of termination or suspension, the Contractor shall be liable for damages as authorized by law including, but not limited to, any cost difference between the original contract and the replacement or cover contract and all administrative costs directly related to the replacement contract, e.g., cost of the competitive bidding, mailing, advertising and staff time.

COMMERCE reserves the right to suspend all or part of the contract, withhold further payments, or prohibit the Contractor from incurring additional obligations of funds during investigation of the alleged compliance breach and pending corrective action by the Contractor or a decision by COMMERCE to terminate the contract. A termination shall be deemed a “Termination for Convenience” if it is determined that the Contractor: (1) was not in default; or (2) failure to perform was outside of his or her control, fault or negligence.

The rights and remedies of COMMERCE provided in this contract are not exclusive and are, in addition to any other rights and remedies, provided by law.

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- **TERMINATION FOR CONVENIENCE:** Except as otherwise provided in this Contract COMMERCE may, by ten (10) business days written notice, beginning on the second day after the mailing, terminate this Contract, in whole or in part. If this Contract is so terminated, COMMERCE shall be liable only for payment required under the terms of this Contract for services rendered or goods delivered prior to the effective date of termination.
 - **TERMINATION PROCEDURES:** Upon termination of this contract, COMMERCE, in addition to any other rights provided in this contract, may require the Contractor to deliver to COMMERCE any property specifically produced or acquired for the performance of such part of this contract as has been terminated. The provisions of the "Treatment of Assets" clause shall apply in such property transfer.

COMMERCE shall pay to the Contractor the agreed upon price, if separately stated, for completed work and services accepted by COMMERCE, and the amount agreed upon by the Contractor and COMMERCE for (i) completed work and services for which no separate price is stated, (ii) partially completed work and services, (iii) other property or services that are accepted by COMMERCE, and (iv) the protection and preservation of property, unless the termination is for default, in which case the authorized Representative shall determine the extent of the liability of COMMERCE. Failure to agree with such determination shall be a dispute within the meaning of the "Disputes" clause of this contract. COMMERCE may withhold from any amounts due the Contractor such sum as the Authorized Representative determines to be necessary to protect COMMERCE against potential loss or liability.

The rights and remedies of COMMERCE provided in this section shall not be exclusive and are in addition to any other rights and remedies provided by law or under this contract.

After receipt of a notice of termination, and except as otherwise directed by the Authorized Representative, the Contractor shall:

- Stop work under the contract on the date, and to the extent specified, in the notice.
- Place no further orders or subcontracts for materials, services, or facilities except as may be necessary for completion of such portion of the work under the contract that is not terminated.
- Assign to COMMERCE, in the manner, at the times, and to the extent directed by the Authorized Representative, all of the rights, title, and interest of the Contractor, under the orders and subcontracts so terminated, in which case COMMERCE has the right, at its discretion, to settle or pay any or all claims arising out of the termination of such orders and subcontracts.
- Settle all outstanding liabilities and all claims arising out of such termination of orders and subcontracts, with the approval or ratification of the Authorized

Representative to the extent the Authorized Representative may require, which approval or ratification shall be final for all the purposes of this clause.

- Transfer title to COMMERCE and deliver in the manner, at the times, and to the extent directed by the Authorized Representative any property which, if the contract had been completed, would have been required to be furnished to COMMERCE.
- Complete performance of such part of the work as shall not have been terminated by the Authorized Representative; and
- Take such action as may be necessary, or as the Authorized Representative may direct, for the protection and preservation of the property related to this contract, which is in the possession of the Contractor and in which COMMERCE has or may acquire an interest.

(2) AGENCY POLICY DOCUMENTATION ON A) DISTRIBUTION OF FUNDING TO SUBGRANTEES ON A REIMBURSABLE BASIS AND B) TIMELY SUBGRANTEE REPORTING MANDATES

- A) Policies on the WSBO's distribution of funding to subgrantees on a reimbursable basis can be found in Section 4.4 "Requesting Reimbursement" of the [Draft WSBO BEAD Handbook](#). Details on the policy include the following: Funds will be disbursed on a reimbursable basis for eligible expenses and will only be distributed as reimbursement for incurred costs; there will be no advance payments under any circumstances. The WSBO utilizes an electronic vouchering method through the Contracts Management System (CMS) Online A-19 Portal. Requests for reimbursement from subgrantees must be completed through this system by an authorized individual from the subgrantee's organization. Each reimbursement request must include documentation of eligible expenses, a Project Status Report and Unified Business Identifier (UBI) Expenditure report, and a list of eligible reportable expenses.
- B) The WSBO's policies on timely subgrantee reporting mandates can be found in Section 4.8 "Reporting Requirements" of the [Draft WSBO BEAD Handbook](#). Subgrantees must submit *Project Status and Expenditure Reports*, *Quarterly Projection Reports*, *Quarterly Progress Reports*, data needed for the *NTIA Semi-Annual Report*, and any other reports required by the NTIA due 30 days after each six-month period, January to June and July to December. Failure by the Subgrantee to submit required reports will result in corrective actions and may result in the WSBO withholding funds and possible restrictions on future grants.

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;

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- 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 – The [WSBO's subgrantee agreements](#) will include all required components to comply with the BEAD NOFO.

5. LOCAL COORDINATION (REQUIREMENT 5)

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

The public comment period opened on August 25, 2025 and closed on September 1st, 2025. The public comment period was open for seven days as required by the BEAD RPN. Washingtonians were encouraged to comment on any section of Washington’s BEAD Final Proposal through a survey that was linked to the Washington Internet for All website. The link to the survey was provided in a news release which was sent out to over 4,000 Washingtonians subscribed to the Internet for All in Washington email list as well as social media platforms. A link to public comments can be found in the Appendix.

The WSBO carefully reviewed all submitted comments. While no changes to the provisional awards were deemed necessary, the WSBO can respond to some of the questions that were included in the comments during office hours. The main themes raised in the feedback are summarized below.

- Some commentators expressed the importance of internet access for all Washingtonians and urged the WSBO to continue the Internet for All effort.
- Some commentators expressed concerns regarding satellite and fixed wireless technologies, specifically noting the following concerns:
 - Satellite and fixed wireless technologies are subject to reliability issues especially in mountainous or forested areas of the state.
 - The higher cost for satellite technology subscription fees and equipment as compared to alternative broadband technologies can be cost prohibitive for residents.
 - Some employers do not allow use of satellite technologies.
 - Satellite and fixed wireless technologies are susceptible to weather issues.
 - Satellite technologies speeds remain below those of terrestrial alternatives.
 - Satellite technologies are limited by aggregate capacity and subscriber density.
- Some commentators expressed concerns that funding satellite technologies through BEAD will not add infrastructure to local communities or create local jobs for Washingtonians.
- Some commentators expressed that satellite technologies can provide internet access to Washingtonians while being more cost effective compared to the alternatives.

- Several commentators expressed the need for fiber optics in rural areas of Washington due to the importance of reliable broadband services, especially during emergencies.
- Several commentators expressed support for awarding broadband funding to the Confederated Tribe of the Colville Reservation and Quinault Indian Nation—stating that this funding will be essential to provide reliable internet, improve public safety networks, and advance digital opportunities for the residents.
- Some commentators noted that portions of the state where residents have experienced poor broadband service were excluded from BEAD funding.
- Some commentators urged that ACP be reinstated for BEAD fund recipients to ensure affordability for all residents.
- Some commentators raised concerns about areas that will be at risk of losing internet service, especially during emergencies, when legacy copper infrastructure is retired.
- Some commentators shared recommendations for how the remaining BEAD allocation should be used to expand connectivity across affordable housing multi-dwelling units (MDUs) or to support eligible non-deployment activities related to broadband adoption and digital skills training.

6. CHALLENGE PROCESS RESULTS (REQUIREMENT 6)

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

The WSBO successfully completed the BEAD Challenge Process, and on November 7, 2024, the National Telecommunications and Information Administration (NTIA) approved the Washington State Broadband Office’s (WSBO) BEAD Challenge results.

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

The “[Final Location Classifications](#)” were posted on November 15, 2024.

7. UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7)

Question 7.1 (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, the WSBO certifies that it 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). The WSBO certifies that for any unserved location not served by a BEAD project, an appropriate reason code for not serving a location will be provided in the fp_no_BEAD_locations.csv file.

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, the WSBO 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). The WSBO certifies that for any underserved location not served by a BEAD project, an appropriate reason code for not serving a location will be provided in the fp_no_BEAD_locations.csv file.

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

Not applicable.

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

Not applicable.

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

Yes, the WSBO certifies that it has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the WSBO will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the WSBO will maintain documentation, following the guidelines provided by the 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.

Unserved and underserved locations that will not be served through a BEAD project are documented in the fp_no_BEAD_locations.csv file. The WSBO will provide the documentation for any such location for NTIA review as requested during or after the Final Proposal review and approval.

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, the WSBO certifies that the WSBO has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the WSBO 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, in its list of proposed projects

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

Text Box 11.1: Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.

The WSBO's implementation plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment are in progress. The WSBO has made the following progress on plans described in the Initial Proposal:

Streamlining cost-effective access to poles, conduits, easements, and permitting: During office hours, WSBO encouraged applicants to become familiar with the make-ready process to streamline their access to poles and conduits and provided informational resources. The WSBO also met with the Washington Utilities and Transportation Commission to discuss ways to reduce barriers to accessing poles related to concerns raised by applicants.

Expanding existing broadband infrastructure data: As part of the challenge process and the inclusion of evidence of coverage submitted by unlicensed fixed wireless providers under the RPN, the WSBO now has a more accurate database of service coverage across the state by location including information on community anchor institutions.

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

Yes, the WSBO certifies that it has required subgrantees to certify compliance with federal labor and employment laws.

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.⁶

Yes, all subgrantees selected by the WSBO will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

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, the WSBO focused on ensuring the reliability and resilience of BEAD-funded broadband infrastructure when selecting subgrantees.

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.

9. SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS (REQUIREMENT 12)

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.

WSBO included several questions in the application pertaining to technical capability to help determine Priority Broadband Project status, in addition to requesting that applicants indicate if they wanted to be considered as a Priority Broadband Project. To qualify as a Priority Broadband Project, applicants had to demonstrate the ability to deliver at least 100/20 Mbps speed, have a latency of 100 milliseconds or less, easily scale to meet future needs, and support the deployment of 5G and other advanced technologies.

The technical capability questions that were geared towards demonstrating the project's scalability included:

- Describe the selection of technology and hardware configurations in both backbone and last-mile segments that support the applicant's speed claim.
- Describe the assumptions and/or calculations around capacity oversubscription, limitations imposed by terrain, and geographic constraints to definitively demonstrate the connection speed and network capacity requirements can be met.
- Describe how incremental capacity will be added in a cost-effective manner during the useful life of the network.

Applicants were also asked to certify that their proposed projects would be easily scalable to meet current and future household/business needs and to support the deployment of 5G, successor wireless technologies and other advanced services and at what speed and latency.

At the time of application, applicants were required to submit supporting documentation to demonstrate their technical capability in alignment with their Priority Broadband Project assertion by submitting:

A technical capability narrative and engineering certification to certify the network design, network diagram project costs, build-out timeline and milestones, and capital investment schedule. Any applicants utilizing fixed wireless technology also had to specify the spectrum being used and the applicant's license for those using licensed fixed wireless.

The WSBO took a multi-tiered approach to determining the Priority Broadband Project determination:

TIER 1 INITIAL REVIEW

The WSBO reviewers evaluated the technical capability documentation submitted including responses to questions about capacity and scalability and reviewed to see if there was alignment between the design, narrative, and claims made about speed, reliability, capacity, and scalability. If additional clarification was needed, or if inconsistencies were found, the WSBO sent clarifying questions to the applicant to respond to.

TIER 2 SECONDARY REVIEW

For competitive project areas, the WSBO utilized a mapping tool that included data layers for tree canopy coverage, customer density, ground clutter, and topography to identify BSLs in project areas where there may be challenges meeting the priority broadband requirements related to speed and latency for applicants that rely on spectrum assets such as wireless and low-earth orbit (LEO) satellite providers. If a certain percentage of BSLs within a project area was identified as being at risk due to any of the identified potential barriers, then a more detailed analysis was conducted by WSBO with support from a technical advisory firm to determine if the application could still meet the Priority Broadband Project requirements for speed and reliability.

Reliability: To consider whether a project was considered Priority in terms of reliability for satellite, the Office looked at how many beams would likely be needed to cover the project area and at estimated horizon blockage (from buildings, terrain, vegetation, etc.) which could obstruct signal at the BSL level. If the horizon blockage exceeded a threshold deemed to significantly impact performance for 10% or more of the BSLs in a project area the application was determined not to meet the reliability threshold. For wireless service, reliability and feasibility of coverage was determined by considering tower locations and heights, topographical features, and the percentage of tree coverage. An initial screening was conducted to identify project areas with 10% or more of wireless BSLs that had topography or tree coverage concerns, which were then reviewed further through a signal propagation analysis.

Scalability: As a scalability threshold for Priority Broadband, the WSBO considered several factors for both the current and future state of performance. One factor was to consider whether the existing customer base would be negatively impacted by the award of BEAD locations. Where data was available, the WSBO looked at currently available speeds during peak hours and compared them to what was described in the technical narrative about any impact on existing customers.

The WSBO also considered the applicant's track record of meeting comparable levels of demand relative to the number of BSLs applied to by the applicant for existing internet service providers. Note, this information was not available for new entrants.

Thirdly, the WSBO considered if future scalability was dependent on yet unproven emerging technologies. For example, emerging technologies often require additional regulatory approvals, such as spectrum allocation, or have shorter operational lifespans requiring more frequent infrastructure and equipment replacement than proven alternatives.

TIER 3 FINAL DETERMINATION

After the secondary technical review was completed, the WSBO staff made their final determination of whether the applicant sufficiently demonstrated that they met the statutory criteria for a Priority Broadband Project based on the application and clarification responses provided. The WSBO's understanding of local characteristics of project areas throughout the state and how project areas were designed supplemented the technical review process.

10. SUBGRANTEE SELECTION CERTIFICATION (REQUIREMENT 13)

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

PRIMARY EVALUATION PROCESS

The primary application evaluation was based on the lowest overall BEAD Program cost (minimum BEAD outlay), with priority given to Priority Broadband Projects as described in Requirement 12. When comparing competing proposals for the same project area, the WSBO assessed the BEAD funding required to complete the proposed project and the BEAD cost per location (i.e., the total BEAD funding required to complete the project divided by the number of BSLs the project will serve).

If only one application was received for a project area, that application was the presumptive selection, provided the costs were not excessively high.

If multiple applications were received for the same project area, the first step in evaluation was to calculate the cost to cover 100% of the BSLs in the project area based on each cost proposal. For project proposals that did not have any BSL removals, the BEAD Program cost provided in the application was used as submitted. If an application included removed BSLs, the WSBO calculated an adjusted BEAD Program cost to make an ‘apples-to-apples’ comparison. All removed BSLs were assigned their CostQuest estimated cost to connect, and the total estimated cost was added to the proposed project’s BEAD cost. Then, competing applications were compared.

For example, if a project area had 20 BSLs, and the WSBO received two Priority Broadband Project proposals to serve them:

- Proposal A was \$100 to serve 15 locations (5 BSLs were removed)
- Proposal B was \$200 to serve all 20 locations (no BSLs were removed)

In determining which application should be selected, Proposal B’s cost at \$200 would be used because it proposed covering all 20 locations in the project area. Proposal A’s cost would need to be adjusted to include how much it would cost to serve the 5 BSLs that were removed. If the CostQuest estimate to serve those 5 removed locations is \$500, then the adjusted BEAD Program cost for Proposal A is \$600 (\$100+\$500). When comparing Proposal A (\$600 BEAD Program cost) to Proposal B (\$200 BEAD Program cost) based on the primary subgrantee selection criteria, Proposal B would be selected.

When the WSBO received an application within 15% of the lowest-cost proposal received for the same area on a per BSL basis, the WSBO considered those applications tied and broke the tie using the following sequential secondary criteria.

SECONDARY CRITERIA EVALUATION PROCESS

In addition to cost, the secondary criteria used aligned with the BEAD Restructuring Policy Notice:

- Speed to deployment
- Speed of the network
- Prior preliminary subgrantees

The WSBO used a gating process whereby the secondary criteria were ordered from most to least weighting, and the winner was determined by the first criterion that broke the tie between the competing applications:

Tiebreaker 1: Prior Preliminary Selection Status

- Winner of tiebreak: The applicant was preliminarily selected and rescinded as a provisional subgrantee in a prior application round for the same project area.
- If no winner, tied applications moved on to Tiebreaker 2

Tiebreaker 2: Technical Capability – Network Performance

- Winner of tiebreak: Application with the highest speed capability averaged across all technologies and BSLs in the project area.
- If no winner, tied applications moved on to Tiebreaker 3

Tiebreaker 3: Technical Capability – Speed to Deployment

- Winner of tiebreak: The Application with the fastest implementation was selected. This was defined as the shortest realistic timeline to service activation based on the engineer-certified project milestones.
- If no winner, tied applications moved on to Tiebreaker 4

Tiebreaker 4: Lowest cost

- Winner of tiebreak: If all other factors are equal, the application with the absolute lowest BEAD request was selected.

For the Benefit of the Bargain round, 22 applications across 11 project areas had multiple cost proposals with an adjusted BEAD Program cost within 15% and were determined based on secondary criteria. Of those, two project areas were resolved with Tiebreaker 1, nine were resolved with Tiebreaker 2, none were resolved with Tiebreaker 3, and none were resolved with Tiebreaker 4.

11. ENVIRONMENTAL AND HISTORIC PRESERVATION DOCUMENTATION (REQUIREMENT 14)

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

WSBO will ensure full compliance with all applicable EHP requirements by adhering to the requirements of NEPA, Section 106 of the National Historic Preservation Act (NHPA), Section 7 of the Endangered Species Act (ESA), and Section 404 of the Clean Water Act (CWA), as applicable, and NTIA's programmatic guidance. All subgrantee projects will undergo a detailed evaluation to avoid, minimize, and mitigate potential environmental and historic impacts.

APPROACH TO ENVIRONMENTAL AND HISTORIC PRESERVATION AND PERMITTING

In 2025 WSBO will be issuing a Request for Proposal (RFP) (to open the end of September and have an agreement starting November) for Environmental Consultants to conduct the NEPA

review and in addition a professional archaeologist monitoring plan for each Washington State project area, that is proposed for ground disturbance on behalf of the Benefit of the Bargain grantee. WSBO will utilize a multi-step methodology to evaluate subgrantee projects for environmental compliance. This process includes:

1. Applicants were required to certify that they will comply with NEPA and NHPA and provide any required materials as a part of the application process.
2. The WSBO NEPA consultant will identify and utilize qualified NEPA and EHP practitioners with relevant environmental and/or historic preservation expertise to assist in preparing and supervising environmental review, ensuring compliance with NEPA, and addressing EHP concerns.
3. The WSBO NEPA consultant will ensure subgrantees design broadband projects in a manner that prioritizes avoiding potential adverse impacts and, where avoidance is not feasible, minimize and mitigate those impacts to the greatest extent practicable. WSBO may require subgrantees to alter project routes if the WSBO determines avoidance of a particular area will significantly reduce subgrantees' pre-construction obligations.
4. The WSBO NEPA consultant, on behalf of subgrantees, will consult the First Responder Network Authority (FirstNet) Programmatic Environmental Impact Statement (PEIS) and any incorporated updates as part of the drafting process.
5. Encourage subgrantees to consult the NTIA Permitting and Environmental Information Application and its ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) project package, together with publicly available tools like NEPAassist, and the U.S. Fish and Wildlife Service's IPaC, to inform preliminary environmental and historic-preservation analyses and minimize potential adverse impacts.
6. Require subgrantees to provide WSBO with a detailed project description¹⁵ and all supporting environmental documentation requested by NTIA or WSBO to support environmental review.
7. Require subgrantees to ensure subcontractors understand and follow all NEPA and other EHP requirements, and to prevent any construction or related fieldwork until NTIA and WSBO final approval of all EHP documentation and issuance of final decision documents.
8. The NEPA Consultant will work with the SBO staff and subgrantees to create, maintain, and share with the WSBO a timeline that captures all NEPA, NHPA, and ESA consultations, reviews, permits and submissions, updating it as necessary to keep every milestone aligned with BEAD program requirements.
9. The WSBO and NEPA consultants will review each subgrantee project and, through the Environmental Screening and Permitting Tracking Tool (ESAPTT):

¹⁵ A "detailed project description" must contain sufficient information, including (1) what is being constructed; (2) where the project is located, listing street address, local jurisdiction (county), any applicable legal land description (applicable Public Land Survey System (PLSS) township, range, and section), and geographic coordinates (latitude and longitude); (3) a physical description of the site or route and surrounding area (developed land versus open space and adjacent resources such as rivers, wetlands, forests, or protected lands); (4) a detailed explanation of how the project will be implemented, covering necessary ground disturbance, connected actions, pre-construction preparations, and follow-up activities after construction; (5) project metrics such as dimensions, areas, distances, depths, and thicknesses, as applicable; (6) any mitigation actions known or anticipated; (7) any permits the subgrantee must obtain before work begins; (8) if applicable, a decommissioning or maintenance plan; (9) a project map that clearly marks boundaries, sites, routes, and activities per required specifications; and (10) photos summarizing the site or route, key areas of interest, and the topography of the project area.

- a. At the earliest possible time, provide the NTIA-assigned Environmental Program Officer (EPO) sufficient information to initiate Tribal consultation via the Federal Communication Commission (FCC)'s Tower Construction Notification System (TCNS).
 - b. Upload the project map, project description, and supporting documentation.
 - c. Complete the categorical-exclusion and extraordinary-circumstances questionnaires.
 - i. If necessary, WSBO will request additional information from subgrantees, such as detailed route plans and engineering specifications, or preliminary mitigation commitments to support efficient, accurate assessment.
 - ii. If Extraordinary Circumstances are present and cannot be avoided though adoption of Best Management Practices (BMPs) and mitigation commitments to avoid potentially significant impacts¹⁶.
 - d. Validate the appropriate level of environmental review.
 - e. Transmit the completed draft NEPA decision memorandum to NTIA's Environmental Program Officer for approval.
 - f. Upon approval, WSBO will continue monitoring project developments to ensure compliance throughout the project lifecycle.
10. The WSBO and NEPA consultants will use ESAPTT's permitting-tracking module to catalog and monitor all applicable local, state, and federal permits against milestone schedules, escalate delays to the EPO and Federal Program Officer (FPO), and document each permit's issuance and progress.
11. The Washington State Historic Preservation Office requires a professional archaeological monitoring plan. In addition, an Inadvertent Discovery Plan, once approved, needs to be posted at the job site trailer.

ENVIRONMENTAL ASSESSMENT (EA) AND ENVIRONMENTAL IMPACT STATEMENT (EIS)

If the significance of the project's environmental impact is not clearly established or known, WSBO will confer with NTIA's EPO to determine if avoidance or mitigation measures can be used to circumvent EA preparation. If a subsequent required EA determines a project to have no significant impacts on the quality of the environment, a Finding of No Significant Impact (FONSI) is issued by NTIA.

An EIS will be prepared for projects when action will likely have a significant effect on the environment. The final decision is documented in a Record of Decision (ROD), which codifies the final decision made, whether to approve the project or not, and the basis for that decision. WSBO intends to avoid this outcome by imposing route alterations if conditions necessitating an EIS are identified.

JOINT LEAD AGENCY RESPONSIBILITY SUMMARY

¹⁶ https://broadbandusa.ntia.gov/sites/default/files/2025-06/ESAPTT_Overview.pdf

As the primary administering agency for the BEAD Program in Washington, WSBO serves as a joint lead agency alongside NTIA to fulfill NEPA obligations and minimize potential delays during the BEAD Program's implementation. WSBO performs its duties in alignment with 42 U.S.C. 4336a(a)(1)(B) and 42 U.S.C. 4336a(a)(2).

In this capacity, WSBO will:

- Administer the BEAD Program in strict compliance with federal environmental statutes, including but not limited to NEPA, NHPA, ESA, and the CWA. Washington understands its role in this capacity to include the following:
 - Obtainment of NEPA and EHP expertise to support the state/territory office.
 - Use of NTIA's ESAPTT for all intended efficiencies, including initial screening, Categorical Exclusion/Extraordinary circumstances evaluation, records management, and post-award monitoring.
 - Establishment of a schedule for environmental review and permitting.
 - Oversight of NEPA document preparation and ensure compliance before submission to NTIA.
 - Prevention of any project activities from starting before NEPA review is complete; and
 - Monitoring subgrantees for compliance with NEPA and other environmental laws.
- Conduct comprehensive evaluations of the sufficiency, applicability, and accuracy of the FirstNet PEIS relevant to Washington's broadband deployment projects.

EVALUATION OF FIRSTNET REGIONAL PEIS

WSBO has reviewed the FirstNet Final Regional Programmatic Environmental Impact Statement for the Western United States, Volume 5, Chapter 7, and the accompanying Record of Decision for the Adoption of the First Responder Network Authority Final Programmatic Environmental Impact Statement – Western Region to assess the sufficiency and applicability of the PEIS to anticipated BEAD-funded activities. The PEIS adequately addresses the deployment-related activities anticipated for Washington. All projects will be evaluated to ensure specific activities of the project are covered by the FirstNet Regional PEIS. In the unlikely event that a proposed activity is not sufficiently covered by the PEIS, additional analysis will be conducted to determine whether supplemental environmental assessment is required to address identified gaps or deficiencies.

The PEIS can be used to inform environmental compliance under the BEAD Program, ensuring that construction and development activities align with established environmental regulations and BMPs. Its comprehensive analysis is sufficient to support informed decision-making and regulatory compliance throughout the BEAD Program's implementation.

This proactive approach ensures WSBO's environmental review process remains comprehensive, adaptive, and aligned with federal and state requirements. WSBO's ongoing collaboration with NTIA further strengthens the state's commitment to environmental stewardship.

SPECIFIC AWARD CONDITIONS (SACS)

To reinforce environmental compliance, WSBO will apply Specific Award Conditions (SACs) to all Grant Agreements, ensuring:

- Subgrantees shall not initiate or allow any grant funded implementation activities—apart from the limited “Uses Prior to Implementation” section below—prior to the following:
 - The completion of any review required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321, et seq.) (NEPA), and issuance, as required, of a Categorical Exclusion (Cat Ex) determination, Record of Environmental Consideration (REC), Finding of No Significant Impact (FONSI), Record of Decision (ROD) that meets the requirements of NEPA
 - The completion of reviews required under Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470, et seq.) (NHPA), including any consultations required by Federal law, to include consultations with the State Historic Preservation Office and Federally recognized Native American tribes.
 - The completion of consultations with the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS), as applicable, under Section 7 of the Endangered Species Act (16 U.S.C. 1531, et seq.), and/or consultations with the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (33 U.S.C. 1251, et seq.), as applicable; and
 - Demonstration of compliance with all other applicable Federal, State, and local environmental laws and regulations.

Additionally, provisions of the Subgrantee Contract require subgrantees’ commitment that they will not commence implementation activities and understand funds will not be disbursed until all necessary environmental reviews are complete and NTIA has approved any necessary decision document, except for the limited permissible activities identified below:

- Timely preparation of any required NEPA documents and obtainment of required permits, adhering to any applicable statutory deadlines as described in 42 U.S.C. 4336g(a); and
- In the event NTIA and WSBO determine further analysis must occur, preparation of a milestone schedule identifying specific deadlines, a description of how the Subgrantee will meet these timing requirements, which may include the completion of consultations, NEPA and Section 106 reviews, and/or the submission of EAs or EISs, in the unlikely event that such efforts are unavoidable.

Regarding NHPA Compliance, the Grant Contract will require Subgrantees to carry out the following actions, as applicable, to satisfy related compliance obligations:

- At the earliest possible time, provide the NTIA-assigned Environmental Program Officer sufficient information to initiate Tribal notification via the FCC’s Tower Construction Notification System (TCNS) when required for grant funded activities.
- Provide notified Tribes with information regarding grant-funded activities via their preferred means of communication, as identified in TCNS.

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- Apply the Advisory on Historic Preservation (ACHP) Program Comment to Avoid Duplicative Reviews for Wireless Communications Facilities or any other applicable program comment or alternative program developed to address the Section 106 review of communications facilities.
 - Notify NTIA of any Tribal request for government-to-government consultation or any identification that a grant funded activity may impact a historic property of religious or cultural significance to a Tribe; and
 - Provide all consulting parties with the statutorily required time to assess any determinations of a grant funded activity's effect on historic properties.

Subgrantees will be required to ensure that implementation (site preparation, demolition, construction, ground disturbance, fixed installation, or any other implementation activities) does not begin prior to the completion of the above activities.

Subgrantees must comply with all conditions placed on the grant funded activities as the result of NEPA or consultation processes—e.g., BMPs or other measures necessary to reduce environmental impacts.

Subgrantees will be required to provide any related information requested by the WSBO or by NTIA (directly or through the WSBO) to ensure both initial and ongoing compliance with all requirements described above.

PERMISSIBLE USES OF AWARD FUNDS PRIOR TO IMPLEMENTATION

The allowable use of Award Funds prior to beginning implementation includes, but is not limited to, activities necessary for the completion of the following:

- Pre-construction planning, including collecting information necessary to complete environmental reviews.
- Applications for environmental permits.
- Studies including, but not limited to, EA, wetland delineations, biological assessments, archaeological surveys, and other environmental reviews and analyses.
- Administrative costs.
- Pre-award application costs.
- Activities supporting consultations required under the NHPA, the ESA, and the CWA; and/or
- Limited, preliminary procurement, including the purchase or lease of equipment or execution of binding contracts to do so; the purchase of applicable or conditional insurance; and/or funds used to secure land or building leases (including right-of-way easements).

REMEDIES FOR NONCOMPLIANCE

Grant funded activities with significant impacts to environmental or historic resources may require de-obligation of funding if impacts cannot be avoided, minimized, or mitigated.

Subgrantees will be required to notify the WSBO within 24 hours upon receipt of any Section 106 notices of foreclosure; notices requesting continuing or supplemental consultation received from the SHPO, Tribal Historic Preservation Office (THPO), or other consulting party or the USFWS; or notices of noncompliance received from consulting authorities or regulatory agencies.

SCOPE CHANGES

Subgrantees and WSBO will acknowledge that any change to the approved scope of grant funded activities proposed after the completion of environmental and historic preservation analyses may alter the nature or extent of environmental or historic preservation impacts. All parties will be required to notify the NTIA of any proposed scope changes, and any approved changes must be re-evaluated for compliance.

ARCHAEOLOGICAL RESOURCES

Burial sites, human remains, and funerary objects are subject to the requirements of all applicable Federal, Tribal, state, and local laws and protocols, such as the Native American Graves Protection and Repatriation Act (NAGPRA), in addition to Section 106 of the NHPA. Subgrantees must notify the Department of inadvertent discoveries and potential impacts to these resources and identify and follow all applicable laws or protocols. Subgrantees should have an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards monitor ground disturbance for grant funded activities proposed in the vicinity of National Register-eligible archaeological sites and suspected or known burials. If any potential archeological resources or buried human remains are discovered during construction, Subgrantees must immediately stop work in that area, secure that area, and keep information about the discovery confidential, except to notify the WSBO, NTIA, the interested SHPO, THPO, and potentially affected Tribes. Construction activities may then only continue with the written approval of the WSBO and NTIA.

ENCOURAGEMENT OF BEST MANAGEMENT PRACTICES

WSBO will actively encourage subgrantees to adopt proactive mitigation strategies aligned with NTIA's BMPs. Examples include:

- Seasonal construction adjustments to protect sensitive wildlife habitats.
- Implementation of erosion and sediment control measures to protect water quality; and
- Design adaptations to avoid disruption of culturally significant sites.

These strategies are strongly recommended to minimize or mitigate environmental impacts and expedite the environmental compliance process.

12. CONSENT FROM TRIBAL ENTITIES (REQUIREMENT 15)

Attachment 15.1 (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 attached Tribal Resolutions of Consent. WSBO will be leveraging the [Programmatic Waiver of Tribal Consent](#) deadline for resolutions that have not yet been received.

13. REPORT OF UNSUCCESSFUL APPLICATION DUE TO ELIGIBLE ENTITY REGULATIONS (REQUIREMENT 16)

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

Yes, the State of Washington 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).

14. 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.'

Yes, WSBO will utilize NTIA's programmatic waiver for an extension for the TC requirement.

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.

APPENDIX – LIST OF ATTACHMENTS

Please note that the attached live documents will be updated if WSBO receives further NTIA guidance for Final Proposal data submission requirements.

PROVISIONAL AWARDEE LIST

APPROVED AWARDEE LIST

DATA SUBMISSION FILES (AS SUBMITTED)

- [Subgrantees CSV](#)
- [Deployment Projects CSV](#)
- [Locations CSV](#)
- [No BEAD Locations CSV](#)
- [CAI CSV](#)

DATA SUBMISSION FILES (AS APPROVED)

- [Subgrantees CSV](#)
- [Deployment Projects CSV](#)
- [Locations CSV](#)
- [No BEAD Locations CSV](#)
- [CAI CSV](#)

MONITORING & POLICY DOCUMENTS

[Draft BEAD Program Handbook](#)

PUBLIC COMMENTS

[Full List of Public Comments](#)

DRAFT SUBGRANTEE AGREEMENT