

Federal Award ID Number	55-20-B091
Grant Request Number	GRN-000091
Funding Program Name	Broadband Equity Access and Deployment (BEAD) Program
Funding Request Name	Wisconsin-BEAD-Final Proposal-Programmatic
Applying Organization	PUBLIC SERVICE COMMISSION OF WISCONSIN
Applicant Name	Alyssa Kenney

1.1 Subgrantee Selection Process

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 Public Service Commission of Wisconsin's subgrantee selection process was undertaken consistent with that approved by NTIA in Volume 2 of the Initial Proposal as modified by the June 6, 2025 BEAD Restructuring Policy Notice.

Volume 2 implementation began in August 2024 with the opening of the Letter of Intent (LOI) process (PSC REF#: 511125) under docket 5-BD-2025. The LOI was intended for entities interested in competing for funding in the BEAD subgrantee selection process. The LOI allowed the Commission to evaluate the technical, financial, operation and managerial capacity of prospective BEAD participants. Applicants that met the federal and state standards and qualifications were invited to apply for funding. There were 35 LOIs submitted and 30 LOIs approved (PSC REF#: 528689) for fiber and licensed fixed wireless technologies. The Commission opened a separate LOI round for what was at the time called alternative technologies, including unlicensed fixed wireless (ULFW) and low earth orbit (LEO) satellite service (PSC REF#: 532872). There were seven alternative technology LOIs submitted and six were approved (PSC REF#: 540654, PSC REF#: 541533).

The Commission opened BEAD Round One on January 13, 2025. (PSC REF#: 528689.) In BEAD Round One the Commission received 425 applications that proposed to serve 95 percent of the BEAD eligible locations. BEAD applications were scored using a rubric approved in the Initial Proposal and that addressed cost efficiency and match contributions, affordably priced service, fair labor practices, expeditious deployment, local coordination and endorsement by county and Tribal governments, and quality of the design and resulting performance of the network. After Commission staff review of applications, the Commission preliminarily awarded approximately \$540 million which would have served 103,685 BEAD eligible locations with fiber to the premise service. (PSC REF#: 543172.)

Revised Implementation Under the Restructuring Policy Notice (RPN)

The RPN required Commission staff to design and administer the BEAD BOB grant round for all eligible locations after rescinding previous BEAD preliminary awards. The policy notice required all states to complete the BEAD BOB grant round within 90 days of the notice date, through a process that

included completing a revised LOI process, optimizing location data, updating the scoring and program requirements to comply with the new rules, and soliciting and reviewing applications. The policy notice eliminated many requirements previously detailed in the NOFO, many of which were incorporated into Wisconsin's previous sub-grantee selection process. Wisconsin substantially modified its subgrantee selection process to comply with the RPN and eliminated scoring categories that had been included in Wisconsin's initial scoring rubric related to affordability, local endorsement and engagement, fair labor practices, and quality of the design and resulting performance of the network.

Location Eligibility

The RPN required updates to the list of locations eligible for BEAD funding. First, states were required to include locations no longer served due to a default or change in service area of a federal enforceable commitment. This requirement did not impact Wisconsin and did not result in any change to its eligible location count. Second, the policy notice requires states to optimize BEAD locations by making ineligible or separating locations that can be anticipated not to require BEAD funding based on data updates that have occurred since the challenge process. Updates include removing locations that other in-progress grants are now planned to serve or removing locations that no longer exist in the fabric. Commission staff conducted the required unlicensed fixed wireless certification process and made other adjustments to optimize BEAD locations per the policy notice prior to the opening of the BOB round. (PSC REF#: 552903). These modifications had the effect of reducing the eligible location count in Wisconsin.

Consistent with the definition in Volume 2, the Commission developed and published project units. Project units are predetermined groups of geographically compact BEAD eligible locations. Approved applicants were required to submit applications using the Commission defined project units. In both the prior rounds and the BOB round the Commission established and publicly posted a list of project units. (PSC REF#: 527846, PSC REF#: 552903) Project units were created to be within a single county or Tribal Nation, to not cross a railroad tracks and to group locations that could likely be built by a single project together.

Letter of Intent Prequalification

The RPN required that the LOI process be reopened before implementation of the BEAD BOB grant round. The Commission opened the BEAD BOB LOI round from June 17 to June 30, 2025 (PSC REF#: 549658) and any eligible entity was invited to apply, including entities that were denied in the first LOI round (PSC REF#: 549648). Previously approved LOI applicants were not required to submit a new LOI but had the opportunity to amend their previous submission.

The LOI process evaluated entities on their overall technical, financial, operational, and managerial capacity to construct new broadband service under the BEAD program. These criteria are laid out in Volume 2, the criteria and review process were unchanged by the RPN and were established to ensure that any awarded funding is successfully deployed.

The prequalification review of the technical, financial, operational, and managerial capacity of entities under program rules was evaluated relative to the overall number of locations the entity proposed to apply for. For example, applicants were required to demonstrate both their financial capacity and capability and provide documentation of their financial position, cash flow and financial management. Also, applicants were required to show existing expertise within the leadership team or a plan to have a qualified contractor with skills specific to telecommunications operations, network engineering and design practices that are shown to perform. Entities in certain circumstances were required to submit additional information through a curing process, or subject to conditional approvals that required additional steps to ensure compliance with the criteria outlined in Volume 2.

After the BOB LOI process, there was a total of 41 entities that were ultimately approved, which included initial approvals from the prior LOI process in 2024, revised approvals of initial requests during the BEAD BOB, and nine approvals of new LOIs submitted during the reopened BEAD BOB period. (PSC REF#: 554322).

Application Solicitation

The Commission's BEAD Grant Award Management System, originally designed for the previous BEAD subgranting process, was adjusted to reflect the updates to the application process. Commission staff compiled new application questions that aligned with requirements set forth in the RPN and published updated guidance documents and technical support for eligible applicants (PSC REF#: 554551, PSC REF#: 554421). Commission staff also created a priority broadband project template and instructions for completing the template (PSC REF#: 554516, PSC REF#: 554544). A complete, project specific template was required for each project seeking priority treatment. The priority broadband project template required specific detail on each proposed project design.

The BEAD BOB grant round opened Thursday, July 17, 2025 and closed on July 28, 2025, at 4:59 p.m. CT (PSC REF#: 556613). Given that the BEAD Grant Award Platform incorporated numerous validations before an application could be submitted and the shortened timeline, the WBO was not able to provide an application curing opportunity to applicants. Commission staff provided webinars, BEAD office hours, and guidance documents before the application deadline to help eligible applicants ensure their application submissions were complete. (PSC REF#: 554551). Of the 41 entities with approved LOIs, 33 submitted applications in the BEAD BOB round.

Upon submission of the applications, Commission staff reviewed any application exceptions, the documentation related to Tribal Consent, the documentation submitted for projects seeking priority treatment and reviewed projects for excessive cost per location. Staff reviewed this information and made determinations in the BEAD Award system. Consistent with Wisconsin's approved Volume 2, the RPN and the published instructions and rules, the BEAD Award System automated the determination related to minimal BEAD outlay and automated scoring the secondary criteria as needed for the resulting preliminary BEAD BOB subawards.

Upon receiving curing instructions, per section 3.4 of the policy notice, wherein NTIA reserves the right to reject any proposed deployment project or specific BSL connection for which costs to deploy are excessive, as determined by NTIA Wisconsin implemented the instructions in the curing notice for the three categories of projects and sent the required documentation to our Federal Program Officer.

1.2 Fair, Open, Competitive Subgrantee Selection

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.

As approved in the Initial Proposal Volume 2, the Commission's Wisconsin Broadband Office (WBO) implemented safeguards to ensure a fair, open and competitive subgrantee selection process.

Fair and Competitive

A transparent process and timely public notices were implemented for all program activities and publication of guidance, timelines, and BEAD-related data. WBO provided robust technical assistance and training materials throughout the BEAD process and changes to the BEAD process to ensure all participants understood the application instructions, program rules and competitive subgrantee selection process.

Applicants were able to access the BEAD Round 1 and Round 2 questions and BEAD BOB questions and related scoring rubrics prior to the BEAD rounds and the Commission provided additional detailed information about the review and scoring process from using Rules and Methodology Documents. The documents were posted to the PSC BEAD Grant Webpage and to the docket 5-BD-2025. The WBO notified applicants of program changes following the RPN and hosted a stakeholders meeting, webinars, training, and office hours to share information and provide technical assistance on the updated BEAD BOB subgranting process.

Per Initial Proposal Volume 2, to maximize competition and avoid issues related to collusion among applicants, WBO required that portions of the LOI related to counties and the number of locations where a certain provider planned to apply be submitted confidentially. WBO prohibited applicants from discussing with other prospective applicants or making any public announcements related to their applications or their contents, including the intent to apply for certain locations, or any other information which would be found to have an adverse impact on the participation of another applicant in the program. During technical assistance meetings WBO continued to provide technical assistance related to the issue of collusion.

During BEAD round one, all reviewers received training prior to reviewing applications. Each scoring criteria had three levels of review: a primary reviewer that completed a standard scoring template, a secondary reviewer that validated the review and an administrative user that checked and approved the score.

During the BEAD BOB round, the WBO moved to a significantly more automated scoring process, where the minimal BEAD outlay and the secondary scoring criteria were determined by the BEAD award platform. Throughout the process the WBO had practices and systems to ensure a fair review process and an automated system with safeguards against collusion, bias, arbitrary decisions and other actions that would undermine confidence in the process.

Additionally, the WBO contracted with external financial, program and technical experts to assist with the review and analysis of the LOI and subgrantee applications. The contracted experts brought additional specific expertise to evaluating financial capacity, project level technical assessment, management, and program compliance.

In implementing a fair and competitive process, the PSC also hired an outside contractor to create the BEAD Award Platform that was used by applicants to submit applications. The platform specifications were aligned to the approved Volume 2 and then modified to comply with the RPN. The platform has validation rules, automatic scoring and automatic deconfliction built into the BEAD award system to ensure a fair and consistent process. The platform validation rules and the deconflictions process are described in Volume 2, the Grant Management System User Guide and the Rules and Methodology document that were made available to applicants and the public on the Commission's BEAD website and in the docket 5-BD-2025.

Open Process

WBO welcomed the participation of all eligible types of entities to submit an LOI to demonstrate qualifications to participate in the BEAD Program in Wisconsin. To promote a wide variety of potential applicants, the Commission reached out to different provider types informing them of the opportunity to participate in the BEAD Process in Wisconsin. The Commission also reached out and did consultations with the Tribal Nations in Wisconsin to promote their participation. Outreach was done through email,

WBO Newsletter, phone calls, office hours, local government and stakeholder meetings.

BEAD information was transparently shared on the Commission's Electronic Filing Record (ERF) System under docket 5-BD-2025, including guidance documents, public notices, and BEAD instructions. Anyone can subscribe to the docket and get all subsequent filings to a particular docket emailed to their inbox. Notices, correspondence and supporting guidance documents containing instructions and timelines to complete the LOI and BEAD application phases were publicly posted prior to each round or phase of the program beginning.

1.3 No Applications

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

Wisconsin affirms that consistent with the process approved in the Initial Proposal as modified by the RPN, when no awardable application was initially received in the BEAD BOB grant round for a project unit, Wisconsin entered the negotiation phase and used the approved negotiation strategies in Volume 2 Round 3 (See 2.4.7 as modified by the RPN) to fill the remaining service gaps.

1.4 CAI Revisions

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.

Following the RPN, an updated list of BEAD eligible Community Anchor Institutions (CAIs) was made publicly available. The updated CAI list reflected the changes set forth in the policy notice and removed any CAIs that conformed to the statutory definition established by IIJA. Following further guidance from NTIA through FAQ documents, the Wisconsin Broadband Office revised its list of eligible CAIs. These revisions include removing some non-government-owned Community Support Organizations from eligibility if they do not provide publicly accessible internet service and currently offer digital skills training. The revised eligible CAI list only includes entities such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, and public housing organizations.

1.5 Records Retention Certification

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

Yes

12.1 Priority Broadband Project

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

For each application, entities indicated if they were seeking Priority Broadband Project status. If yes, they were required to upload the provided template (PSC REF#: 554544). Applicants that did not request priority status were asked to provide a detailed narrative response about the proposed network design, but did not have to upload additional documentation. In total, seven applications did not request priority status and were thus automatically assigned nonpriority status.

The remaining applications sought priority status and were rigorously reviewed on an individual project

basis. Templates asked project-specific questions that sought to understand the unique on-the-ground characteristics of a given project deployment. The Priority Broadband Project template included six required sets of information: 1) Network Diagram 2) Deployment Details 3) Reliability and Quality 4) Equipment 5) Towers and Sectors 6) Performance and Scalability. On each tab the Commission required a set of responses specific to the project's design, performance, and scalability. In proposing a project as priority, the burden of proof was placed upon the applicant to explain the technology, including its existing performance and future expected scalability.

The review process began with staff and expert contractors evaluating the information and specifications provided by the applicant within their template to review if the proposed network would perform as indicated in the application. The review considered the number of proposed customers, backhaul capacity, spectrum utilization, interference mitigation, network management best practices, and other equipment and configuration information to evaluate if the project could consistently provide 100/20 Mbps with low latency to each BEAD location and would easily scale. These determinations were based on the detailed technical capabilities as provided by the applicant and validated by experienced outside contractors, including network engineers, to ensure the proposed design was reasonable, scalable and commensurate with the locations planned to be served.

The next phase of the review evaluated the project's ability to easily scale speeds over time as it relates to the specific geographic project area the applicant was proposing to serve. This analysis was again based on the details provided by the applicant and validated by staff and contracted experts. WBO notes that some applications did not provide the requested information related to the geography and density characteristics of their project and other applicants left the scalability and performance fields in the template empty despite the Commission's clear instructions. (PSC REF#: 554544)

It is difficult to evaluate the future possible increased performance of a network if an applicant does not provide projections about the scalability of the network it proposes. If an application did not provide specific details to justify compliance with scalability requirements laid out by NTIA, staff made determinations with the technical information that was provided in the template, the existing demonstrated performance of the proposed network configuration and the geographic and density information available. When possible, staff utilized the information that was provided in the template, but pursuant to the terms outlined in the template instructions, templates that were submitted with missing, incomplete, or insufficient information were evaluated based on the submitted information as feasible or determined to be non-priority projects.

In addition to the information provided from project templates, staff consulted with contracted experts to incorporate NTIA's guidance related to geography and density of locations in making determinations of priority status. Staff used multiple methodologies of location density and concentration analysis to determine project areas that had a higher location density to ensure the capacity and scalability calculations were commensurate with the on-the-ground realities of the locations proposed to be served. Similarly, staff worked with outside contractors to apply two different methodologies for analyzing tree coverage, vertical assets, changes in elevation, weather and other natural and physical features and applied the findings to the proposed project areas to ensure the proposed network designs sufficiently accounted for these geographic features. Using these methodologies and external expertise Commission staff determined which projects should be treated as priority broadband projects and which projects should be considered nonpriority.

13.1 Eligible Entity Scoring Criteria

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.

Consistent with the RPN Wisconsin prioritized priority broadband projects over non-priority projects. For competitive applications Wisconsin used the scoring rubric guidance in the RPN. The primary scoring criteria used was Minimal BEAD program outlay where competitive applications for the same area were scored based on the lowest cost per BSL. The lowest cost per BSL was determined by dividing the BEAD funding requested for that area by the BSLs the applicant had included in the application for the area. The primary criteria was used to make the award unless another competitive application was submitted within 15 percent of the lowest cost per BSL.

When applications were within 15 percent, the secondary scoring rubric was utilized to compare projects. The secondary scoring rubric was as follows:

Speed of Network and Other Technical Capabilities (75 points): Asked the applicant to certify that the proposed technology for the application can consistently (99.5 percent of the time) and concurrently (at the same time) provide upload speeds of 1000 Mbps or 1 gigabit to at least 90 percent of the BEAD eligible locations in the proposed project area.

Preliminarily Awarded in Round 1 (25 points): If 100 percent of the BSLs in the submitted project application were preliminarily awarded in Round 1 to the applicant, the application received 25 points. If less than 100 percent and more than 50 percent of the BSLs in the submitted application were preliminarily awarded in Round 1 to the applicant, the application received 15 points. If at least 10 percent and up to 50 percent of the BSLs in the submitted application were preliminarily awarded in Round 1 to the applicant, the application received 10 points.

The BEAD scoring rubric was automatically implemented within the BEAD award platform.

In total 45 applications went to secondary scoring criteria and 25 applications awarding 3900 locations were determined using the secondary criteria.

6.1 Certification of Challenge Process

Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

Yes

6.2 Public Post Website - Challenge Process

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.

On November 19, 2024 the Commission posted a letter and the linked associated location lists to the docket 5-BCH-2024 with the final location classifications.

<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=524422>

7.1 Coverage of Unserved Locations

Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

Yes

7.2 Unserved Locations - Financially Incapable Narrative

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.

NA

7.3 Unserved Locations - Financially Incapable Documentation

If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

7.4 Coverage of Underserved Locations

Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

Yes

7.5 Underserved Locations - Financially Incapable Narrative

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

NA

7.6 Underserved Locations - Financially Incapable Documentation

If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

7.7 Certification of No BEAD Location Documentation

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 final list of eligible locations through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the fp_no_BEAD_locations.csv file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

Yes

7.8 Certification of Enforceable Commitments

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

4.1 Public Waste, Fraud, and Abuse Hotline

Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

Yes

4.2.1 Oversight and Accountability - BEAD Program Monitoring Plan

(1) BEAD program monitoring plan;

Wisconsin Broadband Office BEAD Monitoring PI-08-15-2025 03-08-PUBLIC SERVICE
COMMISSION OF WISCONSIN-GRN-000091.docx

4.2.2 Oversight and Accountability - Agency Documentation

(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.

Requirement 4.2 monitoring and accountability-08-15-2025 04-32-PUBLIC SERVICE COMMISSION
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4.3 Subgrant Agreement Certification

Certify that the subgrant agreements will include, at a minimum, the following conditions:

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

Yes

11.1 Implementation Status of Plans - Cost and Barrier Reduction

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.

Complete

11.2 Status of Compliance - Federal Labor and Employment Laws

Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

Yes

11.4 Status of Compliance - Low-Cost Service Option

Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

Yes

11.6 Status of Compliance - Network Reliability and Resiliency

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

Yes

3.1 Timeline of All BEAD Grant Activities

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 Commission's WBO has 11 years of administering funding and monitoring grant recipients through both state- and federally funded broadband grant programs. The WBO has dedicated staff committed to monitoring and reporting BEAD progress. Through the LOI process (question 33), application instructions and program materials, Wisconsin has taken measures to ensure that all approved applications understand and have committed to complete the project within four years. Per the draft WI BEAD grant agreement and draft LEO capacity grant agreement, Wisconsin has taken decisive measures through binding grant agreements to ensure subgrantees will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

WBO grant staff will monitor all projects to ensure grant and agreement compliance and provide subrecipient technical support to facilitate speed to deployment. Additional monitoring includes robust reimbursement review, interim and final reporting, and a final project review prior to close out. Federal grant programs also conduct entity-level risk assessments, desk reviews and site reviews to assess operational, fiscal, managerial and technical capacity. Projects are managed using a centralized grants management system, and each step in the project is tracked separately with detailed tracking systems to ensure each subgrantee is performing to the requirements of the legally binding grant agreement. Should any step fail to be conducted timely, or accurately, the grant management system has a cure function to address the issue. Technical support is again provided as needed to cure any issue, and the cure is tracked in accordance with written process. The combination of these tracking systems will help ensure key milestones are being met prior to reimbursements of fixed award amounts, as well as completion of all BEAD activities within the mandated timeframes, which includes subgrantee reporting and accountability.

5.1 Local Coordination - Public Comment

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.

Wisconsin held a public comment period for seven days, from August 22, 2025 through midnight on August 29, 2025. The Final Proposal and associated data was made publicly available through the dedicated BEAD Commission docket 5-BD-2025 through the Commission's electronic records filing (ERF) system. In addition to posting Draft Final Proposal, the Commission posted a Commission memo, a BEAD preliminary awardee map and a document indicating the preliminary awards by entity by county. In addition to the 5-BD-2025 docket the Commission posted the materials on the BEAD Grant Webpage and sent a special Newsletter announcement

<https://content.govdelivery.com/accounts/WIPSC/bulletins/3eef053> . Political subdivisions, applicants and members of the public were afforded an opportunity to submit comments during the comment period and many successfully submitted comments.

During the seven-day comment period the Commission received 113 timely comments that represented a broad range of feedback and opinions including the following themes:

- Many comments in support of the draft final proposal
- Comments that expressed disappointment or concern with a particular technology or a specific preliminary subawardee
- Comments that indicated a preference for fiber or indicating that fiber was a better investment
- Comments indicating that certain locations may be served, should have been BEAD eligible or may not be a broadband serviceable location
- Comments about the cost of internet service for Wisconsin residents and supporting affordable internet subscription
- Comments relating to uses for non-deployment funds
- Comments relating to the impact and critical nature of quality internet access for their family or community
- Comments relating to the draft grant agreements

Prior to the Commission Open meeting, staff reviewed the comments to determine which comments may need further review and response. After reviewing the comments staff remain confident that Wisconsin's Final Proposal continues to align with federal statute, the BEAD NOFO and the June 6, 2025 Restructuring Policy Notice and that BEAD processes in Wisconsin and Final Proposal are consistent with the approved Initial Proposal volumes I and II as modified by the policy notice.

On September 3, 2025 the Public Service Commission of Wisconsin met in a publicly noticed open meeting to discuss Wisconsin's Draft Final Proposal and preliminary awards. Prior to the meeting the Commissioners reviewed the Commission memo, Draft Final Proposal, related documents in the docket 5-BD-2025 and public comments submitted for their consideration. After deliberation and discussion that included consideration of the public comments, the Commission approved the BEAD Final Proposal for submission and directed staff to finalize draft and submit it for approval to NTIA, including making any modification necessary to gain approval from NTIA.

A list of timely public comments filed are below:

- 1.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=560054>
- 2.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=560053>
- 3.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=560051>
- 4.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=560050>
- 5.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=560049>
- 6.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=560048>

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105.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559372>
106.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559368>
107.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559364>
108.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559333>
109.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559324>
110.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559318>
111.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559243>
112.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559241>
113.<https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=559239>

14.1 EHP Documentation Upload

Submit a document which includes the following:

Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.

Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.

Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.

Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

Requirement 14 EHP NEPA Final Proposal Docume-10-02-2025 06-46-PUBLIC SERVICE
COMMISSION OF WISCONSIN-GRN-000091.pdf

16.1 Prohibition on Excluding Provider Types

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

17.1 Waivers

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.'

Wisconsin intends to utilize NTIA's Programmatic Waiver for Tribal Consent.

A waiver request was emailed for the one project that requires a waiver for the 25% non-federal match requirement.

Final Proposal Funding Request Amount

Enter the amount of the Final Proposal Funding Request.

\$1,050,823,573.71