

**DOC-NTIA-OTIA (US)  
Broadband Infrastructure Program**

**Moderator: Susannah Spellman  
August 4<sup>th</sup>, 2021**

**Carole Garner:**

1:16

Hello, and welcome to the webinar. We will begin shortly. Before we do begin, a quick note to please take a moment to review the slide that's on the screen right now. Unfortunately, for a portion of the webinar if you have used the audio on a dial-in bridge, you will not be able to hear the recorded portion of the webinar. The solution to this is if you're on a mobile device, you can download the GoToWebinar app and hear the webinar in that fashion. But if you did dial in, unfortunately, you will not be able to hear the first part of the webinar. If this is your only option, please know that we will have this presentation, along with a transcript. The materials will be available on the BroadbandUSA website by August 11th. So, you will have an opportunity to see that then. Thank you, and we will begin shortly.

**Susannah Spellman:**

2:33

Hello, everyone. Welcome to the Broadband Infrastructure Program webinar for this August. This will be the last webinar before the applications are due on August 17th. My name is Susannah Spellman and I'm with the NTIA's BroadbandUSA program. As a reminder, this webinar is being recorded and will be posted to NTIA's BroadbandUSA Program website.

2:53

Today's webinar focuses on NTIA's Broadband Infrastructure Program, and is the fifth of a many-part series. Before we begin, I would like to review the logistics for today's webinar.

3:04

First, we will open up the webinar for questions after the completion of the presentations. As you hear from each presenter, please use the question box on the right-hand side of the screen to submit your questions or comments.

3:15

Second, the presentation, along with a transcript and audio recording of today's session will be available on the BroadbandUSA website within seven days of this webinar under the Events-Past Events tab.

3:28

Finally, please visit our BroadbandUSA website for information about our Technical Assistance Program, including useful guides, products, publications, and other tools that can assist you with planning, funding, and implementing your broadband project. We provide updated information including our monthly newsletter and other broadband news.

3:47

Our presenters today are Jennifer Duane, the Director of Grants for NTIA, Natalie Romanoff, a Grants Management Specialist with NTIA, and Katherine Bates, the Team Lead for the Broadband Infrastructure Program within NTIA.

4:01

Our first speaker is Jennifer Duane. Jennifer is a Senior Broadband Program Specialist for NTIA's BroadbandUSA Program, where she manages the office's grant programs and facilitates interagency coordination to support efforts to streamline federal permitting processes. Jennifer joined NTIA in 2009 to develop policy for the Broadband Technology Opportunities Program, otherwise known as BTOP. She then served for two years as a Senior Attorney Advisor at the Office of Chief Counsel for NTIA, providing legal advice to NTIA offices on a variety of telecommunications, information technology, and commercial data privacy matters. From 2012 to 2017, she served as a Senior Advisor to the Assistant Secretary on matters related to broadband and public safety. Before joining NTIA, Jennifer served as a State Regulatory Attorney, and then Director of Federal Regulatory Affairs for Sprint Corporation. She earned an undergraduate degree in Economics from Penn State and a Juris Doctorate degree from the George Washington University Law School.

5:03

Our next speaker, Natalie Romanoff, is a member of NTIA's Office of Public Safety Communications serving as the Program Director for the State and Local Implementation Grant Program (SLIGP) 2.0 grant program and is on a detail to OTIA to support the new broadband grant programs. Natalie has more than 15 years of experience in grant and program management, and has a Master of Public Administration degree from George Mason University.

5:27

Our last speaker is Katherine Bates. She is back with us after being on loan to the Treasury Department earlier this summer and spring, rejoining us as the Team Lead on the Broadband Infrastructure Program. Additionally, Katherine has worked with state and local governments to increase broadband access throughout the United States, focusing on unserved and underserved areas. Before coming to NTIA and the BroadbandUSA program, she worked with large library systems on the E-Rate Modernization Effort at ICF International, a global consulting firm. Where she focused on broadband funding, planning, training, and technical assistance.

6:02

Prior to that work, she worked for a decade at a national association representing municipal interests, focusing our efforts on information technology, broadband policy, and community and economic

development. Katherine received her bachelor's in business and Masters of Public Administration from the University of Tennessee in Knoxville.

6:21

So real quickly, our agenda today is to go over the high-level programmatic aspects of the Broadband Infrastructure Program, that will be led by Jennifer. And then Natalie Romanoff will go through the application, including the pre-submission activities, how to complete the forms, how to submit, et cetera. And then Katherine will go through some of the FAQs that we've been getting over the last couple of months and also provide information on where you can find links to new FAQs. And we'll again discuss some of the top FAQs that we've been getting. After that, we will open up for Q&A and take in questions from you that you provide in the chat during the presentation in the Q&A section. And now, we turn the presentation over to Jennifer Duane.

7:07

**Jennifer Duane:**

Thanks, Susannah. I'm Jennifer Duane, Director of Grants for NTIA and as I've done in the June and July webinars that we had on this program. I'm going to spend a few moments in this webinar highlighting some of the key definitions and requirements for the Broadband Infrastructure Program.

7:27

Now, the Broadband Infrastructure Program is a grant program where NTIA has \$288 million available to award to covered partnerships. And those are defined as a partnership between a state, [or] one or more political subdivisions of the state, and a fixed broadband service provider. Now, the covered partnerships are required to deploy covered broadband projects, and these are projects that are competitively and technologically neutral to deploy fixed broadband service that provides qualifying broadband service in an eligible service area.

8:07

NTIA opened up the application window for this program on May 19th, 2021, with the release of its Notice of Funding Opportunity. The statute required us to give a 90-day application period to accept applications, so we will be accepting applications for this program through August 17th, 2021.

8:30

Now, I just want to highlight a couple of key points and definitions for the program.

8:35

The first is qualifying broadband service, and that is defined in the Act as the provision of broadband service that provides speeds of 25 megabits per second download and three megabits per second upload, and a latency that supports real-time, interactive applications. In the NOFO, NTIA also added a few more clarifications to that definition. We indicated that the

speed requirement of 25/3 means the ability to provide 25/3 simultaneously to every household in the eligible service area. And we define latency to mean 95% or more of all peak period measurements of network, round trip latency are at or below 100 milliseconds.

9:32

The other definition that I want to emphasize is the definition of unserved. Now, unserved under the Act means a household lacks access to qualifying broadband service (which I just discussed), and no broadband provider has been selected to receive or is otherwise receiving federal or state funding subject to enforceable build out commitments to deploy qualifying broadband service in the specific area where the household is located by date certain (even if such service is not yet available, provided that the federal or state agency providing the funding is not deemed the service provider to be in default of its buildout obligations under the applicable federal or state program).

10:23

The next key point I want to emphasize on this slide goes to eligibility. Now, an eligible service area is defined under the Act as a census block in which broadband service is not available at one or more households or businesses in the census block. Now, to determine that eligibility, we will be looking at the information that the FCC has provided in its maps, the FCC Form 477 data, and we'll also leverage NTIA's National Broadband Availability Map in determining what qualifies as an eligible service area. Along with other data sources that we have in the map, or that we have available to us.

11:09

The eligibility also gets to the eligibility for this program, and to be eligible to submit an application under this program, we need to understand who the covered partnership is [and] what the covered broadband project will be. That includes the speed(s) at which the project will be, or at which broadband service will be offered, along with the cost of the project. That also means identifying the proposed service area for funding.

11:45

And then there's also the requirement in the Act that the applicant, the covered partnership, identify any state or federal support that the fixed broadband service provider that is part of the covered partnership is receiving for the proposed service area that's identified in the application.

12:04

The NOFO also includes a lot of other requirements that are required to submit with your application. So, I'll just, rather than go through them as part of this webinar, I'll just refer you to look at the NOFO for all the key requirements of an application that has to be submitted for this program.

12:25

Then, the last point on this slide is the prioritization factors. Now, the Act identified several funding priorities. And NTIA is prioritizing the first funding priority that was identified in the Act, and that is to provide qualifying broadband service to the greatest number of households in an eligible service area. And we're going to be sequencing applications as they come in to identify those that are focused on this initial funding priority when we review applications for funding. The other priorities are focused on providing broadband service to areas that are more rural in nature. So, the Act talks about looking at areas that include areas other than those that have 50,000 inhabitants. And that is just a prioritization factor. It's not an eligibility factor.

13:31

So, applicants that have areas that are including counties or other areas that have more than 50,000 inhabitants are still eligible to apply. It's just they are not covered by this funding priority that's been identified in the Act. And then there's also the requirement that we look at, projects that are the most effective, cost effective, and prioritizing those that are in rural areas. And then, the final prioritization factor is the speed level, and we'll be looking at applications that propose broadband service providing speeds of 100 megabits per second download in 20 mega megabits per second upload.

14:22

So, I want to spend a couple of minutes talking about eligible uses of funds. Now, grant funds may only be used to pay for allowable costs. And those are defined as costs that are reasonable, necessary, and appropriate and allocable to the project. Costs may be direct or indirect. So direct costs are those that are directly traceable to the project. Indirect costs are more akin to overhead. An applicant that wants to include indirect cost in its project proposal must provide that as part of its budget and they must have a Department of Commerce (DOC) approved indirect cost rate or be applying for one or just use the de minimis indirect costs of 10%. And this is all detailed in the NOFO sections on the application submission requirements.

15:19

Now, the Act identified several eligible uses of funds and these are also set forth in more detail in the NOFO. So, the covered partnership may use grant funds to fund the cost of construction, improvement, and/or the acquisition of facilities and equipment required to provide qualifying broadband service. And this includes infrastructure for backhaul, middle, and last mile networks. And we tried to craft these eligible use categories fairly broadly to make sure that they can encompass as many activities that are necessary to deploy broadband infrastructure as possible.

16:00

Another allowable cost is the cost of long-term leases. And these are for facilities that are required to provide qualifying broadband service and this

includes infeasible right-of-use (IRU) agreements. So, we say that the terms can be longer, greater than one year. But basically, the applicant needs to provide payment for the cost of the lease during the award period of performance, which is one year, or longer if you receive an extension by the Assistant Secretary.

16:36

Also, cost of engineering, design, permitting, and work related to the environmental and historical and cultural review process are allowable. In our July webinar, we went into more detail on the requirements associated with the environmental and historical and cultural reviews. So, I would refer you back to those first [webinars] for more detail on what would be covered under environmental and historical and cultural reviews.

17:03

Also, personnel costs, including salaries and fringe benefits for staff that are working on the project. These are all allowable costs. And so, folks that are working as project managers, program directors, grant administrators, financial analysts that are working directly on the project may be paid for with grant funds under the program.

17:25

We also allow for reasonable pre-application expenses or grant preparation and cost, but they may not exceed \$50,000. Then there's, of course, the catchall of allowable costs which are necessary to carrying out the program activities of an award, but they do not include ineligible costs.

17:46

So, just as we have eligible costs, we also have ineligible costs. And there are two categories. One that applies to all members of the covered partnership, and one that applies just to the fixed broadband service providers that are part of the covered partnership.

18:02

So, with respect to the covered partnership, they may not use grant funds received under program to purchase or support any covered communications, equipment, or services, as defined in Section 9 of the *Secure and Trusted Communications Networks Act of 2019*. So, basically, they may not procure equipment that may pose national security risks.

18:25

Also, profits or fees and other incremental charges above actual costs are not allowable under the program.

18:32

Then, the covered partnership may not use grant funds, directly or indirectly, to support or oppose collective bargaining. Now, with respect to the provider of broadband service, that is part of the covered partnership, they may not use funds to repay or make any other payment related to a loan that's made by any public or private lender. They also may not use funds as collateral for a loan made by any public or private

lender. And they may not use more than \$50,000 of the grant amounts to pay for their preparation of the grant. Also, they may not use funds for previously incurred administrative costs or previously purchased equipment or construction activities undertaken prior to the award.

19:19

Then finally, costs may not be used to locate any funding that the provider has received to deploy broadband service at locations that are used to meet an FCC Universal Service Fund deployment obligation.

19:36

So, as I mentioned before, we are accepting applications for this program. They must be done [in] grants.gov and they must be received no later than 11:59 PM eastern daylight time on August 17<sup>th</sup>, 2021.

19:53

So, now I'm going to turn things over to my colleague, Natalie Romanoff, and she's going to go into a deeper dive on the application package that is required under the program. And looking at each of the standard forms that are required, and along with the budget narrative and detailed budget justification. She'll go into a bit more detail on that. So the slides that I covered on eligible uses and ineligible uses will factor into that discussion because when you're completing your budgets, you need to make sure that they only contain costs that are eligible for funding under the program. So, with that, I will turn this over to Natalie for her presentation on the application review materials. Over to you, Natalie.

20:42

**Natalie Romanoff:**

Thanks, Jennifer. Today, I'm going to walk through several aspects of the Broadband Infrastructure Program application. While there are many steps in the federal grant process, today I'm going to focus on completing pre-application activities and submitting the application in grants.gov.

21:01

While you're gathering your application materials, it is extremely important your organization has an active SAM.gov registration. If your SAM.gov registration is inactive, it may take up to 30 days to re-activate your account. You must have an active SAM.gov registration to receive federal funding.

21:22

In addition to SAM.gov, you need to make sure you have access to Workspace in grants.gov for your entity. This will mean you need to have a username and a password. It could take several days to rectify grants.gov access issues. So be sure to check and make sure you have access to the system for your organization as soon as possible in case you need to make any changes.

21:44

Lastly, to ensure you have a complete application, use the "Content and Form of Application" section in the NOFO to verify your application is



complete before you submit it. Incomplete applications will not be accepted. This slide is pulled directly from page 26 in the NOFO and provides details on how to register in grants.gov.

22:07

The biggest takeaway is that the state or political subdivision will need to have their active SAM.gov registration and a DUNS number in order to register and apply in grants.gov.

22:19

The Broadband Infrastructure Program will be using all of the standard forms, SF-424 family for the application. All of the standard forms will be found on grants.gov. The standard forms that you will be required to complete are the SF-424, SF-424C, SF-424D, and applicable lobbying forms.

22:42

In addition to the Standard Forms, the Broadband Infrastructure Program requires specific programmatic and budgetary information as part of the application package as being in the right column. These forms will be created by you and are not standard or pre-created forms. The documents include a project narrative, a budget narrative, and detailed budget justification. An indirect cost rate, if you're using one, letters of commitment, map of the proposed service area, pro forma financial information and analysis, and network diagrams and system diagrams.

23:19

Now, I will do an overview of some of the application documents. For the next several slides, I will walk you through the SF-424, which is required with your application. Not all of the highlighted sections are required, and some of the non-highlighted sections are highly encouraged to be completed. I will walk you through what sections to complete.

23:42

In Sections 1 and 2, you will indicate that your submission is an application and new. Section 3 will auto-populate when you submit your application in grants.gov so you do not need to complete that field. You are also not required to complete Fields 4, 5A, 5B, 6, or 7.

24:03

The next section you will need to complete is Section 8, which is the applicant information.

24:09

The legal name you enter into the SF-424 must match your SAM.gov registration. Similarly, the EIN, organizational DUNS, and the address must also be associated with the legal name listed in your SAM.gov registration. Section E is not required but is recommended. It is recommended that the applicant complete the Department name and/or division name for the entity applying for the federal funds, especially if the applicant at the state.



24:41

Next section that is required is Section F, which is the name and contact information of the person involved in the application. Typically, this is the authorized representative. You will need to enter their name, title, phone number, and email address. The organizational affiliation field is optional but recommended.

25:03

In Section 9, you will need to enter your eligibility status as your type of applicant. More information on eligible entities can be found in the NOFO on page 9.

25:15

In Section 10, you will complete the name of the federal agency as the National Telecommunications and Information Administration.

25:24

You do not need to complete Section 11, which is the CFDA number.

25:29

In Section 12, you'll complete the Funding Opportunity number information as the Broadband Infrastructure Program. This is found on the first page of the NOFO, and in grants.gov.

25:42

Section 13 is not required to be completed. Section 14 is not required, but it's highly recommended to be completed if you will have multiple areas affected by the project. You can add a Word document or an Excel sheet if you have more than one area affected by the project. Section 15, you will enter a descriptive title for your project.

26:08

Section 16 is required to be completed. You will enter the congressional district for where your project will be located in Sections A and B. You can attach a spreadsheet or a Word document if more congressional districts will be impacted by the project.

26:22

If you do not know your congressional district, please go to [www.house.gov](http://www.house.gov) to search to find your congressional district.

26:31

The proposed start and end date should be listed as a one-year period of performance, starting after November 29th, 2021. Please be aware that only your official award document from NTIA will determine your period of performance. This that you enter will not be your Period of Performance.

26:50

Section 18 is the funding section. In row A You will enter the total federal amount that you are requesting.

26:59

If you are providing a match, enter the match amount in the correct field, either B, C, D, or E, depending on where the funding will be coming from.

27:09

Question 19 is required; this program is subject to Executive Order 12372.

27:16

If your state has a designated intergovernmental review or SPOC, please indicate field A and complete when you've sent your application over to that person for review. If your state does not have a designated intergovernmental review SPOC, you can select B and submit your application without state review.

27:38

Please visit [whitehouse.gov](http://whitehouse.gov)'s Federal Financial Management page to see a list of the current state intergovernmental review SPOCs.

27:48

Question 20 is required. If your entity is delinquent on any federal debt, you need to check Yes and provide an attachment explaining the debt.

27:58

Question 21 is also required. The list of certifications and assurances can be found in the SF-424D.

28:07

The last section, the authorized representative information, must also be completed. You need to fill in the name, first name, last name, title, telephone number, and email address. The authorized representative must also sign and date the form.

28:23

In addition to the SF-424, you must also submit Standard Forms SF-424C and SF-424D.

28:33

The next several slides, I will talk about the SF-424C. The SF-424C is one of three project budget documents you will need to submit with your application. You will submit this form along with the budget narrative and a budget detail justification. The SF-424C is found on [grants.gov](http://grants.gov). The budget narrative and detailed justification are not standard forms, so you will need to create these documents to submit with your application.

29:04

In the SF-424C, you will complete column A, total cost; [column] B, costs not allowable for participation; and column C, total allowable cost.

29:17

Column A is where you will input the total cost for your project by cost classification. This will include your federal funding request, any maps you will provide, and any other funds needed to complete your project.

29:32

Column B is where you will input the amount of funding that is not allowable, but you are using to support this project. This could be other sources of federal funding, such as a federal grant, or funding for activities that are not allowable under this program but you plan on completing with outside funds.

29:51

Column C is the total allowable cost for each cost classification, which is column A minus column B.

30:01

When you submit your application, your budget narrative and budget detail justification should mirror the SF-424C budget document. The budget narrative is typically a Word document where you give detail to each type of charge for your project. Typically, this detail includes a description of the activity or fee, the cost basis, the cost unit, the number of units, and the total cost.

30:28

The budget detail justification is typically an Excel document showing the type of cost, quantity, unit cost, and total for each line item.

30:38

If you will be providing match for the project, you will need to indicate this match on both the budget narrative and budget detail justification and clearly delineate what will be matching cost and what will be federally funded costs.

30:52

I will quickly go through the cost classifications on the SF-424C.

30:57

Row one is for your administrative and legal expenses. Unlike the Tribal Broadband Connectivity Program, the Broadband Infrastructure Program does not have a cap or a maximum percentage of total charges for the cost classification. Some examples of administrative expenses include costs attributable to accounting, auditing, budgeting, and general ledger services, or facility occupancy costs like rent or utilities.

31:26

Typically, your indirect costs will fall into this category. Row two is for charges for land, structures, right of way, appraisals, and other similar charges. This may include structures like a utility cut or rights of way permits needed for construction activity. Row three is for relocation expenses and payment. This could include charges related to moving equipment from one building to another.

31:53

Row four is for architectural and engineering fees. These fees could be for plans or designs to be developed. If you're not sure if the fee is specifically

for architectural or engineering activities, you can list the other fees in row five, which is other architectural and engineering fees.

32:11

These fees could include testing fees for the network or equipment, or field study fees. Row six is for any project inspection fee, or fees directly related to project inspection.

32:23

Any administrative or filing fees should be included in your administrative and legal expenses section, which is row one.

32:32

Row seven is for site work costs. This could include costs for the site work, site preparation, or site utility work necessary for your project. Row eight is for demolition and removal fees. Any environmental fees associated with the demolition should be included in the administrative and legal section, which is row one.

32:54

Row nine is for construction costs. You should input all costs [for] the construction activities for your project, which will include taxes and any delivery fees.

33:04

Row 10 for equipment costs. These should be any costs for equipment for the project, but not for equipment components for the network that are associated with construction activity. If you have small office machinery, you can also put those costs in this row.

33:21

Row 11 is for miscellaneous charges. If you have a charge that does not fit into any of the previous costs classifications, you can put it in this row. Be sure to give a detailed description of the costs so NTIA understands what you are planning on charging to the award.

33:37

Row 13 is for contingencies. Contingency fees are not reimbursable by federal funds.

33:45

Row 15 is for project or program income. If you believe you will have program income as defined by 2CFR200.307, you can enter the estimated amount here. Please remember that only program income during the period of performance should be indicated on this row.

34:04

Row 16, column C will be the total allowable cost for your project, which is inclusive of the federal charges and match contribution.

34:15

Then, in row 17, you will enter the percentage of the federal share for your project. If you're not providing a match, your project will be 100% federally funded; therefore, you will enter 100 on the line in row 17.

34:31

If you are providing a 10% match, you will enter 90 into the row in line 17 because the federal share will be 90% of the total cost. After entering the percentage in row 17, [then] row 17, column C should show the total federal assistance you will be requesting. This number should match the federal assistance number in your SF-424.

35:00

I would like to recap some of the important budget considerations for this program.

35:04

You are not required to provide a match program for this program. However, NTIA will favorably consider applications that propose to contribute a non-federal cost share or a match of at least 10% of the total eligible costs for a project. Your match may be either cash or in-kind.

35:24

No matter what type of match you propose, you must document your capacity to provide the match in your application. If you are providing the optional match with the program, be sure to account for this in your SF-424 and SF-424C.

35:40

As I mentioned before, column A of the SF-424C will include all your costs for your project for each of their cost classifications. If you're planning on providing match, be sure to include this in column A, along with your federal funding request.

35:56

The Broadband Infrastructure Program does not have predefined percentages for the cost consideration. This means that NTIA does not require or have caps on how much can be budgeted for each cost consideration. This extends to the administrative and legal cost consideration. The Broadband Infrastructure Program does not have a ceiling amount or ceiling percentage on this category.

36:21

Pre-application expenses are allowed under this program; however, they may not exceed \$50,000. Allowable pre-application expenses include activities or expenses related to preparing an application between the publication date of the NOFO and prior to the date your award is issued by NTIA. Lobbying costs and contingency fees are not reimbursable by the program.

36:48

In your application, you must clearly identify any pre-application costs in both your budget narrative and budget detail justification. Additionally, pre-application costs are incurred at the sole risk of the applicant; it will not be reimbursed by NTIA if the proposed project does not receive a grant award.

37:09

As I mentioned earlier, there are several nonstandard forms that you must submit with your application package.

37:14

The first is the project narrative. This is a 20-page single space document describing the key elements of your proposed project. The full requirements of the project narrative can be found beginning on page 13 of the NOFO.

37:29

There are many different requirement sections that must be addressed, so please follow the NOFO to ensure that you provide all the relevant and necessary data.

37:40

The budget narrative and budget detail justification document that I described earlier are also required with your application. Please be sure that your detail spreadsheet can fit on letter sized paper.

37:54

If you're interested in charging indirect costs to the award, you will need to submit an indirect Cost Rate Agreement from a cognizant Federal Agency. Each applicant must also submit a letter of commitment from an authorized representative from each member of the covered partnership.

38:09

Additionally, maps, pro forma financial information, network diagrams, and system diagrams must also be submitted with your application.

38:20

Now, I will talk about submitting your application.

38:23

The NOFO has specific requirements for the format of your nonstandard application form, such as the project narrative and budget narrative. More detail on your application format can be found on page 17 of the NOFO.

38:38

You will need to submit your application through Workspace on grants.gov. Please be sure that you have an active SAM.gov registration prior to attempting to submit your application in grants.gov. Late or incomplete applications as well as applications submitted by fax, email, mail, or courier service will not be accepted.

39:00

Now, I'll turn the presentation over to Katherine to discuss the program FAQs.

**Katherine Bates:**

39:08

Thank you, Natalie. I really appreciate Natalie's willingness to help out on the Broadband Infrastructure Team as her knowledge of federal grants is vast. She's been a great resource for us.

39:18

Now, I want to first talk about the exciting part. What happens after you turn in your application? There is a three-step review process that NTIA will follow.

39:27

First is the initial administrative and eligibility review of completed application packets. At this point, any application submitted by anyone who is not an eligible applicant will be eliminated from further review.

39:43

If there is missing or incomplete information from the applicant, we will notify them. An applicant will have seven calendar days to submit missing materials. If the applicant does not remedy these deficiencies in a timely manner, NTIA may deny the application.

40:00

As stated in the NOFO, we will first sequence applications that address priority one.

40:07

This priority, which is proposing a covered broadband project that is designed to provide broadband service to the greatest number of households in an eligible area. These applications will then be evaluated against the objective criteria set forth in Section 5A of the NOFO to determine their further eligibility for award.

40:30

To the extent that funding remains available, after we complete the review of priority one applications, we will then review applications that address priority two and continue with this priority sequencing process until we have awarded all available funding.

40:45

Then those applications will move to merit review (so the second box) where at least two objective reviewers that have demonstrated expertise in broadband deployment will review and score the applications. The reviewers may be federal employees or not.

41:02



During the review process, the reviewers may discuss the applications with each other, but will score the application from 0 to 100 on an individual basis. Application scoring over 70 points will be considered qualified for funding. So after the merit review is complete, those applications that were scored as 70 or above and qualified for funding will move to programmatic review.

41:28

In this review, NTIA program staff, such as myself, will use available data from the FCC as required in the Act to validate eligible service areas.

41:40

The FCC Form 477 data is a data layer in NTIA's National Broadband Availability Map (NBAM), and we will rely on this data, along with other datasets contained in the NBAM, and any other available information to validate applicants' proposed service areas is meeting the Act's definition of an eligible service area. We'll also provide a comprehensive review, ensuring that the application meets all objectives set out in the NOFO. At this point, NTIA staff may request supplemental documentation and will re-evaluate the application package based on all of the available information presented.

42:21

Applicants will have 10 calendar days to submit any additional information to NTIA. As you can see, the process is very thorough, and NTIA will be very busy this fall.

42:35

Now onto the fun stuff.

42:36

If you have a question, I bet [the] NTIA website has the answer. We have been posting FAQs on our website on a fairly regular basis trying to capture the most common questions we have received, and even including some not so common ones. NTIA staff is happy to answer your questions, but I would recommend consulting our FAQs first before sending an email to us.

43:00

If your question is not answered directly in the FAQs, I bet something close to it is in there and you can infer the answer.

43:07

The FAQs are organized by category, including the categories listed on the slide: Program Overview, Eligibility, Other Broadband Funding Programs and Eligible Service Areas, How to Apply, Evaluation of Applications, Grant Award and Reporting Requirements.

43:28

Some common questions are listed here and the answers can be found in the FAQs, such as what constitutes a covered partnership? Who's the lead

applicant? How's the funding going to be handled? How will NTIA determine if an area is eligible? Are there any mapping requirements? Are the service areas that are to be served by non-wireline broadband services eligible for this program? Will we need to have an environmental review completed prior to submitting the application? Is minimum broadband speed based on advertised or actual speeds? If there are supply chain issues, can NTIA extend the period of performance? All of these questions and many more can be answered on the website.

44:15

The easiest way to navigate the FAQs is to perform a keyword search, such as on environmental, or FCC, unserved, latency, et cetera. Whatever you're looking for, just type in a keyword, and if the question is on there it will pop up. If you can't find the answer, then contact BroadbandUSA at [BroadbandUSA@NTIA.gov](mailto:BroadbandUSA@NTIA.gov).

44:40

We will have another set of FAQs that will be posted very soon and expect that we will have one more set posted a week before the application is due, so check the website regularly.

44:53

And now I'll turn the webinar back over to Susannah to moderate the Q&A session for all those questions that are not found in the FAQs. Thank you for joining us today. And now I'll hand it to Susannah.

45:11

**Susannah Spellman:**

Hello, everyone. I'm going to wait for the rest of our panelists to come on screen. Thank you so much for all of the questions that you guys have been posting. There's a lot of really great questions in there.

45:23

Oh, just a heads up. If we do not address your question, it's possibly because it's already been addressed in the FAQ, so please look at that link we posted in the chat to see prior FAQs that were posted. Or they are FAQs that we're about to post and are going through legal clearance. Or they're actually could be questions that we don't know the answer to or need to do a little more research on, but we will include in upcoming FAQs. So, please, if you don't see your question being answered, don't worry, we will address it. It's just it may have already been addressed, so definitely in the FAQs or are upcoming.

46:02

But I'm going to start with the first question that I think many folks are very curious about, and I want to throw this one to Katherine. Is there any possibility or estimation that the application deadline might be extended beyond 8/17/21?

46:23

Oh, I can't hear you, Katherine.

46:28

**Katherine Bates:**

I'm sorry, but the easy answer is no. There will not be. We think that these programs can be oversubscribed, and I think that it's super important to meet the deadlines that were laid out in the legislation for us.

46:47

So, the quick and easy dirty answer is no, correct, Jennifer?

**Jennifer Duane:**

That is likely to be the case. Katherine, yes.

46:59

**Susannah Spellman:**

All right, so now we're getting into some nitty gritty questions that have come up about, in particular, the grants.gov, SF-424 questions. So, I'm going to be asking Yongming Qiu (Ming) who has joined us. He is from the NIST grants office and is working closely with us to administer this grant program.

47:17

So, I had a question here, Ming, for the scope of work. Are you looking for the allowable cost categories and associated dollar amount from the 424C listing to be aligned with the proposed funding amount?

47:32

**Yongming Qiu:**

Yes, thank you for the question. So, the answer's yes. So, whatever the amount proposed on the 424C, it has to align with the scope of work. And all the costs in the 424C should be itemized and supported with detailed justification on all the cost categories in the 424C.

47:57

**Susannah Spellman:**

Thank you. Another question for you in regards to the applicant section on the grants.gov application form: for a covered partnership, should the service provider also be listed as an applicant?

48:12

**Yongming Qiu:**

The answer to that question is no. The 424C is for the lead applicants to include that information in the 424C. So the broadband provider would not be the lead applicant in that form.

48:31

**Susannah Spellman:**

So, I'm going to throw this to Jennifer. Where should that discussion be in terms of naming the service provider partner or partners that will be part of the covered partnerships?

**Jennifer Duane:**

So, you're going to want to put that in your project narrative. One of the first questions in the NOFO indicates that we're looking for a description of the covered partnership. And that includes the entities that comprise the covered partnership: the state [or] the political subdivision of the state, along with the fixed broadband service provider, or multiple broadband service providers if it's a covered partnership containing more than one

fixed broadband service provider. So, use your project narrative to explain who are the members of the covered partnership.

49:06

**Susannah Spellman:**

OK, thank you. Back to you Ming. For the awarded grants – people are already thinking they're going to be successful. This is great. We love that confidence. Question about how the funds are going to be disbursed to the grantee. Will it be in a single lump sum upon award? Or do the covered partners have to pay out of pocket and submit for reimbursement?

49:37

**Yongming Qiu:**

That's a great question. I love the anticipation.

49:41

So if the application is selected for an award, the award will include some specific award conditions. Unless otherwise stated in the specific award conditions, the payment will be authorized to the nonfederal entity. The preauthorized funding will be in ASAP.gov and the recipient will be drawing down funds from there as needed to cover the expenses incurred or anticipated [to be] incurred the maximum of 30 days. However, only the prime recipient MAY directly draw funds from the federal award funds. And in that connection, the prime recipient is responsible for reviewing all subrecipient and vendor invoices to make payments to the subrecipient or vendors. I think we have the answer in the FAQ addressed directly to that question. So, please check out our FAQs for that answer in more detail.

50:47

**Susannah Spellman:**

Thank you, Ming. Katherine, we have a question about the project narrative. In particular, when the applicant is supposed to describe their proposed service area. The applicant wants to include photographs in a separate document and upload to a zip file. Is that allowed?

51:12

Oh, you're on mute again.

51:19

**Katherine Bates:**

Because my house is a little loud. Sorry, guys. But I do like the easy questions, Susannah. Yes! Please do if it's available.

51:32

**Susannah Spellman:**

Yeah, definitely. There is some specific additional guidance in the NOFO about what they do want in the narrative, but pictures are not necessarily required. But if you want to provide them, you can upload them as an attachment.

51:42

**Katherine Bates:**

And there are instructions of the type and how to upload also on grants.gov and in the NOFO. So be sure and read that in the format that everything should be in. And I think you said that, Susannah.

**Susannah Spellman:**

52:00  
OK, great.

52:02

So, I think this is for Ming. In particular, regarding how the different potential grant requirements, including the reporting requirements, et cetera, and the CFR rules regarding grants, would flow down to the covered broadband partner, so they are not the lead applicant to the actual grant.

**Yongming Qiu:**

52:28

So, it really depends on how the award is structured based on the prime recipient. If the broadband infrastructure provider is a subrecipient, a lot of the times it will flow down to the subrecipient.

**Susannah Spellman:**

52:49

Great. Thank you. Katherine, must the state or political subdivision be the submitter on grants.gov or can the vendor partner handle the submission directly?

**Katherine Bates:**

53:01

The state or instrumentality of the state must be the lead applicant. So yes, I could just say, yes. The state or instrumentality must be the applicant.

**Susannah Spellman:**

53:17

Jennifer, a question for you. In regards to a proposed service area or a project that has multiple sites. Must an SF-424C be completed for each site or should it represent the entire project?

**Jennifer Duane:**

53:31

I think it should represent the entire project just because in the SF-424C, you're just putting the cost of the total project by object classification, as Natalie went through in depth. And you want to provide one budget and then just make sure that all the service areas that are included as part of the project, costs associated with the deployment for those service areas are included in the SF-424C total cost of the project.

**Susannah Spellman:**

54:02

OK, thank you. We've gotten a few questions about what's the difference between the project budget that needs to be submitted and highlighted in the 424 documentation and the pro forma financial information and analyses such as balance sheets, income statements, and statements of cash flow. I'm throwing that to probably both Katherine and Jennifer.

**Jennifer Duane:**

54:25

The budget is going to be looking at the specific costs associated with the cost to deploy the broadband infrastructure. We're also evaluating certain qualifications of the applicant as they come in, so as part of the covered partnership, the state, the fixed broadband service providers. So, we want

to understand, in terms of providing the pro formas, we wanted to understand a bit about that the project itself and what kind of revenue and expense projections, but also a bit of the applicant's organizational financial capacity to take on the project [and] ensure that it is financially viable [and] sustainable.

55:08

And this all factors into the evaluation criteria when we're going to be looking at the applicant's organizational capability, the reasonableness of the budget, the financial sustainability of the project. So, we didn't specify particular items to be provided in the NOFO or a timeframe. I think our guidance is just you want to provide sufficiently detailed information, so, a reviewer, both the merit review and programmatic reviewer, can look at that financial information and understand and be able to evaluate the application in conjunction with those evaluation criteria.

**Susannah Spellman:**

55:47

Great. Thank you. And another question, Jennifer.

55:50

Oh, sorry, go ahead, Katherine.

**Katherine Bates:**

I was going to say and that question will be addressed in a FAQ that's coming out probably this week. Hopefully, very soon. Yes, it's, yes.

56:03

**Susannah Spellman:**

So, Jennifer, here's another question in particular about other federal or state support for broadband projects in the proposed service area.

56:12

The applicant wants to know, does the NOFO just require a list of federal or state support or details about the amounts being received? And they want to further know, does this apply for just the proposed service area or for the entire area the service provider operates?

**Jennifer Duane:**

So, the Act asks for the applicant to disclose any federal or state support that the fixed broadband service provider is receiving in the proposed service area. And this information is, you know, we have an obligation to make sure that we're not duplicating federal funding.

56:44

So we need to understand if the area is receiving federal funding from that particular fixed broadband service provider. So it would be helpful to know the speeds at which they're authorized to deploy with the federal funding they're receiving. The amount would also be helpful. But just, you know, in order for us to make that determination, this is the information that we need to understand that. And the timeline.

57:15

Exactly, Katherine, thank you. The timeline for the funding.

57:23

**Susannah Spellman:**

All right. Ming, we're getting a lot of questions and I think we talked about this earlier before we jumped on this webinar. But folks want to know in the grants.gov portal, where specifically they're supposed to upload attachments.

57:37

**Yongming Qiu:**

That's a great question. So actually, that question, the answer is actually in the NOFO. The instructions are at the bottom of page 16, top of 17 of the NOFO, Section, 4D addresses the attachment of the required documents such as attaching a Project Narrative, budget, and et cetera.

58:00

The applicant actually does this in the SF-424, line 15 of the SF-424. There's an "Add Attachments" button there. You click on open the zip file in order to upload the required documents. Part of NOFO, Section 4D.

58:16

So, you would not upload in the portal, but you upload it in the SF-424, line 15. There's a button there that says "Add Attachments." You click on the button, open up a zip file, and that's where you upload all the required documents.

58:35

**Susannah Spellman:**

Great, thank you. All right. Here's another tricky question in regards to other pending federal money.

58:41

So, Jennifer, question asked is if we have a pending grant that we expected to receive and would fund a portion of the project, would that be entered into column B of the SF-424C? So maybe this is Ming too, because I know he knows these SF-424 documents like the back of his hand.

**Jennifer Duane:**

So, this is other federal funding an applicant might receive? So it would likely be in that column, because, unless that, it could be included as match, but since it's other federal funding, you know, and we have an FAQ on this, that talks about when federal funding can be used as a match for another federal program. But it can still be included, as they're using it to the fund part of the cost of the project. But, if it's not specifically allowable as a federal cost share, then it would go into that column of the SF-424C.

**Susannah Spellman:**

OK, great. Thank you.

59:44

So, I think, Katherine, I'm going to throw this one to you. It's in regards to the review process. So, the potential applicant asks does the initial review process mean the applications will be reviewed based on the number of unserved locations that will be served in the project and that the review



process could stop there if enough applications covering large numbers of locations are received.

1:00:14

**Katherine Bates:**

Okay, you lost me there, Susannah.

1:00:16

**Susannah Spellman:**

I think, let me go let me ask this. So, I think they're asking that because we talked about how you talked about how applications will be somewhat prioritized in programmatic review – not prioritized, thank you, sequenced – based on how many underserved locations that they will be potentially serving.

1:00:42

So, I think the applicant wants to know, will the review process stop if there are enough applications covering large numbers of locations that are received? So, I think they want to know.

1:00:56

**Jennifer Duane:**

If I could jump in, I don't think it will stop. I mean, because, basically, the initial review is just designed to make sure that the application is complete, the eligible entities are covered partnership is an eligible entity, we'll also take out certain data from the application, and then to sequence. So, number of households would be a factor in how we're sequencing applications.

1:01:17

But we would put it through merit review, and we wouldn't necessarily stop at that point if there are other applications that had more unserved households that might be sequenced beforehand. We would still continue with our merit review and the other applications.

**Katherine Bates:**

And, I did want to point out, to be realistic, there's \$288 million in this program. That's \$288 million more than we had last November, but it's not a large amount of money.

1:01:52

**Jennifer Duane:**

Yeah. And so, I think in some of our guidance in the NOFO we encourage in smaller cities, counties, political subdivisions, to work with their state broadband office [and] consult with them. So, combining an application with multiple service areas will get you in that first priority sequencing, the greatest number of households and so what we do encourage some of the smaller counties or subdivisions to consult with their state broadband office and work with them.

**Katherine Bates:**

And there are states that are going to submit on behalf of some of these projects, too. So, I also think it's important that you should open your lines of communication with the state anyway. Because with this \$288 million, there's also a lot of other broadband money out there right now that states are accessing and states are using American Rescue Plan money for broadband projects. So talking to your state is just a really good thing to

do. And if you have any questions on who to talk to on your state, that is on our website also. If you go under Resources on the BroadbandUSA website and click on States, and then find your state on the map. It will have an email of the state contact. So, I would encourage that, even if you submit on your own, to open up those lines of communication right now.

1:03:16

**Susannah Spellman:**

Great. Thank you. Important point. All right. Here's another question.

1:03:22

I'm going to ask, Jennifer. If we're planning to serve a large number of census blocks, for example, 2,000 or so, can they be listed in an attachment? The applicant is concerned that the lists of census blocks will take up an enormous amount of space in the project narrative that is page constrained.

1:03:40

**Jennifer Duane:**

Yes, definitely. You can submit it as an attachment. If you want to put it as a map, we also accept that as an indication of what your proposed service area is, so yeah, we would definitely allow that.

1:03:53

**Susannah Spellman:**

Great. Alright, so right now, I'm going through the questions, so just bear with me. I'm going to go through the questions [because] a bunch of popped up. But I was actually teeing up questions that many of you guys were asking during the presenter presentations. So, bear with me, as I go through here, I might not be going through them superfast.

1:04:20

**Jennifer Duane:**

Susannah, while you're doing that, I can just address a point that Natalie had raised in her presentation. She's on vacation this week, so she's not able to join us in person. She covered the SF-424C contingency, and I just wanted to point out and she specifically mentioned contingency fees as not being reimbursable for grant funds, and that's correct.

1:04:45

But in line 13 of SF-424C also contemplates contingency costs, which are costs associated in the constructions projects that may be unforeseen and so you can build some of those costs into your estimates. We are actually going to be coming out with an FAQ and our next set that will specifically address contingency costs and how and where they go on line 13 and how to factor them in.

1:05:15

We did receive a couple of questions, if NTIA has a percentage amount to use for contingency costs, and will also say this in our FAQ, but the general range that NTIA, as well as it straight into the Economic Development Administration (EDA) in some of its grant programs, is a 10% to 15% of cost ranged factor in for contingencies. And our FAQ will be a lot more articulate about this than I just was. But I just wanted to give people a heads up, because we have gotten that question a couple of times

in directly submitted to us. And we will be addressing it in an FAQ that we will get out, or that we're hoping to get out this week.

1:05:58

**Susannah Spellman:**

Great, thanks, Jennifer.

1:06:00

Here's a good question, I think it is covered in the NOFO, but it's probably worthwhile bringing up again. Are there any stipulations in the NTIA grant preventing foreign suppliers and contractors?

1:06:14

**Jennifer Duane:**

Well, we do have that prohibition, which directly relates to that Act, the *Secure Network Construction Act*. And that's mainly for contractors, equipment suppliers that pose national security risks. And I would urge you to physically consult that, those provisions for that, those direct prohibitions. Offhand, other than those prohibitions there may not be. We do have, of course, a Buy American preference in an executive order that we're following as part of our NOFO. I would just direct folks to look at the executive order as they're contemplating where to procure their equipment.

1:07:00

**Susannah Spellman:**

OK, thank you. Ming, this is a question about grants.gov and the 424 documentation. There was a question: will the DUNS number auto populate the legal name section on the Form 424? What if there is a slight difference in the name of the registered DUNS number and the name entered in legal name?

1:07:22

**Yongming Qiu:**

That's a great question. Um, I don't think I'm able to answer that question right now. Jennifer, do you have insight on that?

1:07:32

**Jennifer Duane:**

I think as Natalie was saying, you want to make sure that those descriptions – so you're registered in SAM.gov and in your grants.gov – you want to make sure that legal and description name aligned, because I think it should populate automatically. But if there is a discrepancy, I think you want to make sure that gets rectified so there's no problems in terms of what's in SAM.gov versus what's in grants.gov

1:07:59

**Susannah Spellman:**

OK, thank you. Yeah, here's an interesting question.

1:08:12

If a broadband service provider contracted all of their construction and all of their infrastructure and they originally bid these construction services, but they did not include standard federal clauses in that bid. Can we still

use that award for the construction using these funds? Will there be any requirements to amend contracts?

1:08:40

**Jennifer Duane:** Offhand, I don't think so. But, I mean, we'd have to look at that on a case-by-case basis and understand exactly what was being bid, and some of those provisions. But, offhand, I don't think that that could be an issue. Ming, do you have any thoughts on that?

1:09:00

**Yongming Qiu:** No, actually, I don't have any additional things to add.

1:09:02

**Katherine Bates:** I think it would be important to put it in the narrative that this is a potential issue. That we've done this, and we're this far, but this is what we didn't include. And then that can give people a chance to follow-up, if needed.

**Jennifer Duane:** Yeah. I think that's the best thing. Just to flag it for us, and then we can request additional information and see if there is any provisions that might be implicated by that.

1:09:27

**Susannah Spellman:** I think this is coming in, or was in a recently released FAQ. The applicant wants to know if having a named service provider as a part of the covered partnership is a requirement for the application.

1:09:43

**Jennifer Duane:** It is, yeah. The covered partnership requires state or a political subdivision, and a fixed broadband service provider. So in order to apply, you need to have both of those entities identified. You may be able to, if there's certain things on the backend, in terms of recurring, or things that a state or political subdivision need to do to secure the services of that fixed broadband service provider, that's OK, but we just need to understand who it is going to be named in the application.

1:10:16

So we need to understand, first of all, you have a covered partnership that meets the qualifications in the NOFO. So, we need to understand who is the fixed broadband service provider piece of the covered partnership. So we definitely need to know at least the name. It doesn't have to be a formal agreement yet in place. We need letters of commitment from the entities comprising the partnership, but so we would definitely at a minimum need the identity of the proposed fixed broadband service provider that's going to be part of the covered partnership.

1:10:46

**Susannah Spellman:** So, here's a kind of a question that kind of follows that, does that broadband service provider or providers have to be designated as a subrecipient in the project?

**Jennifer Duane:**

1:10:56

It doesn't have to be. Basically when we make an award, [the] lead applicant, which will be the state or the political subdivision, they'll become this recipient, or the prime recipient, and there's different roles – they can be a contractor, they can be a subrecipient. But I think, as we pointed out in previous webinars, and it's also an FAQ – if the fixed broadband service provider is planning on owning the network or the assets that are funded through this grant they will need to be a subrecipient, because only recipients and subrecipients can hold title to property that's funded with grant awards.

1:11:37

So, that might, in many cases, be the determining factor as to whether the fixed broadband service provider component of the covered partnership becomes a subrecipient of the award.

**Susannah Spellman:**

1:11:51

All right, thank you. Here's another question.

1:11:54

This is an EHP question, which I know was covered in the last webinar, so if you want to check there. But here is a specific question regarding if the environmental review needs to be undertaken site by site or as a whole service area?

**Jennifer Duane:**

1:12:09

I mean, you don't need to have everything completed beforehand, and I think on our previous webinar we covered that. It depends on what you're proposing to do.

1:12:24

I think in terms of the ground disturbing activities, we want to be looking at the project as a whole to determine the level of scrutiny. Whether a categorical exclusion applies, whether environmental assessment applies. So we will need to understand what you're planning, what activities are taking place at each site, but I think overall, we look at the project as a whole in determining the level of environmental review that's applied.

**Susannah Spellman:**

1:12:56

Back to pro forma financials. Folks want to know if the pro forma financials are specific to the lead applicant, or to the service provider, or to the project.

**Katherine Bates:**

1:13:13

This will be answered in an upcoming FAQ, and Jennifer answered it pretty eloquently. But I think that, sorry, I think that you need to have it for the project, but then, you also need to put information in the application of the Internet service provider of the companies to make sure that we know that they can do the project. So, anything that you think that

would help make sure that we know that they're financially viable and can do the project.

1:13:57

**Jennifer Duane:**

Yeah, like I said, I think we weren't specific. We didn't have specific requirements in terms of what to propose for this, in large part because we didn't have a chance to do an information collection under the *Paperwork Reduction Act*. So, we were trying to be as flexible as possible as to what kind of information we can request from applicants. But the idea as you're putting together your application is you really want to be driving everything you submit toward the evaluation criteria, because that is what the merit reviewers and the programmatic reviewers are going to be looking at. So, you really want to focus on that and give us the information that we need so that you have a strong application that hits all those elements in the evaluation criteria, because that is what the merit reviewers are going to look at. That is what we're going to look at in programmatic review. So, I would err on the side of more and more detail than lack of detail. So, that's, I think, the best guidance we can offer at this point.

1:14:56

**Susannah Spellman:**

So, here's a follow up question on the census blocks, and I think I can answer this, but Jennifer and Katherine, tell me if I'm wrong.

1:15:04

Someone asked if a map will suffice with the census blocks being served versus having a list of the census blocks. And I think we want a list of the census blocks, correct?

**Jennifer Duane:**

I think we want a list of the census blocks just because the definitions in our Act are tied to census blocks. So, I think we need to know, get a sense of what the census blocks are being served so can understand what services are there already. A map will also be helpful in making that determination and we also plan on leveraging some of the data in our National Broadband Availability Map to make some of these determinations. So, I think we do need to have an understanding of the census blocks, but a map is also helpful in making that determination of what their proposed service area is.

1:15:53

**Katherine Bates:**

Again, more is better, even if it's a long list.

1:16:00

**Jennifer Duane:**

In our fourth FAQ that we posted deals strictly with the map information that we would really like to receive. Again, we're not being prescriptive about it, but we're just indicating this kind of information that we would find helpful in making these determinations in terms of maps and what kind of map format that we would like to see the data in.

1:16:24

**Susannah Spellman:**

I've gotten a couple of questions where, I think, it's fantastic to see the excitement for these grant programs, but I think, we just need to remind folks that there are multiple grant programs going on that NTIA is administering. One person was asking a question, saying, hey, last week's webinar said the deadline was 9/01. But you guys, today, say that it's 8/17. I just want to reiterate; we have three live grant programs right now. One was just launched this week.

1:16:53

But the 9/01 due date is the Tribal Broadband Connectivity Program. And for the Broadband Infrastructure program, which is what we're talking about today, that due date is 8/17. So just wanted to make sure. And then someone kindly offered here, that if there's a discrepancy with the DUNS number and the name, it can be cleared up over the phone with DUNS support. So, there's a hot tip right there, right?

1:17:15

**Katherine Bates:**

Now, someone probably had a discrepancy and learned that. So, thank you for sharing.

1:17:27

**Susannah Spellman:**

Yes, thank you. Here's another question. This is a good question. Is it OK to put the narrative on the front and the back? So, I think people are trying to maybe say, one page would be like, a front and back. But I think what we're trying to say, Jennifer, tell me if I'm wrong, that one page is one side, correct?

1:17:47

**Jennifer Duane:**

Yeah, I think 20 pages. Yes. So, one side is one page one and the backside is page two.

1:18:07

**Katherine Bates:**

Yeah. And the font needs to be readable.

1:18:15

**Susannah Spellman:**

Yeah. We're having some questions about, in particular, if there is a municipal government that's providing the broadband service that they won't be eligible. They are. They just need to be mindful that they need to apply with a political subdivision as well. So, I think we cover that in the FAQs.

1:18:39

**Jennifer Duane:**

And the reason is because it's a partnership, a concept of a partnership requires two entities. Even though in theory a municipality that has its own broadband service that also acts as broadband service provider can function in two roles, we'd need two different entities in order to form the covered partnership. So, whatever role the municipality or the municipal service provider wants to take, they can. They want to be the political subdivision in the partnership and have another fixed broadband service provider, that's fine. If they want to take on the role of the political



subdivision and then have another fixed broadband service provider, that's fine too. We just need two different entities that are not affiliated with each other to form the covered partnership.

1:19:31

**Susannah Spellman:**

So, I'm getting a few more questions I'm going to ask because they're very specific. I think a lot of folks are recognizing that in grants.gov, it asks for the lead applicant, but they want to make sure that they're able to correctly name their service provider.

1:19:47

So, in the table of funded participants, should the broadband provider who will ultimately own and operate the infrastructure be listed as a co-applicant or subrecipient?

**Jennifer Duane:**

In the table, they can be listed in the pre-award phase, as a co-applicant, because they're part of a covered partnership. You look at it as two phases: pre-award or post-award. In pre-award the lead applicant will be the governmental entity. The covered partnership can be designated as a co-applicant and part of the current partnership. And all the other covered partnerships could be designated as co-applicant. And then later on in post-award, once we make an award, as I mentioned earlier, there will be the prime recipient which will be the governmental entity, either the state or the political subdivision, and then all the other participants will probably take on either the role of the subrecipient or contractors and vendors or depending on what role they're taking on and actually completing the project.

1:20:53

**Susannah Spellman:**

OK, thank you. All right. Going through this guys. I'm going through the questions. And, like I said, if we don't ask your question, it's because we most likely, hopefully, have addressed it in the FAQs, or [it is in] the upcoming FAQs, or there's some tricky questions that we actually need to go back and do some research on.

1:21:20

There's a tricky one here. If an applicant is receiving CAF BLS that applies to the entire study area which has buildout requirements across the study area, how do we determine whether the areas eligible for funding since the funds are not specific to a location?

1:21:39

I don't know, Jennifer. That may not, we may not know the answer, necessarily, but I'm going to see if you know.

1:21:45

**Jennifer Duane:**

I mean, I think this is a just a CAF BLS study area, that they're indicating that funding. So, we'll want to want to know the speed, because we do have projects eligible or are considered unserved under this grant program. If an area lacks access to qualifying broadband service, which as

I mentioned during the presentation is 25 megabits per second upload, three megabits per second download and sufficient latency to deliver real-time interactive applications.

1:22:18

So that's our threshold for determining whether an area is eligible for funding under this program. So I think we just need to understand where this particular area is serving, what locations, and then the speed at which the services being offered, the timing, some other considerations that we would factor into our analysis as to whether the area is eligible for funding under this program.

1:22:52

**Susannah Spellman:**

Here's a question about indicating unserved census blocks. The applicant is asking if they should separate the Form 477 data unserved blocks from the ones that experientially are unserved through Ookla data or other speed test data?

1:23:14

**Katherine Bates:**

I'll just jump in on this. We're going to verify unserved areas. So, any data that you can submit that would boost the case for it being unserved would be helpful. So if you have Ookla speed test data that says it's unserved even though it is technically served under [Form] 477, include that – that will be important to know. We looked at a lot of different resources in NBAM, National Broadband Availability Map. We look at all the sources we have, of which Ookla is one of them. But, if you have that data, please submit it and please make a note of it in your narrative.

1:24:03

**Susannah Spellman:**

Okay, I'm trying to see if there's any more coming in. Here's some more. Well, there is a follow up question: how will eligible locations be verified? And I think Jennifer and Katherine just answered that.

1:24:21

**Katherine Bates:**

Yes and to find out more information on the data sources that the National Broadband Availability Map has, you can go to the BroadbandUSA website, and under Resources go to Data and Mapping. And it will tell you all the resources that we have. It includes federal data, it includes commercial data, and it includes state data if your state is participating.

1:24:46

**Susannah Spellman:**

Here's another question. I think it's in one of the upcoming FAQs. I know it was mentioned in the NOFO, but it wasn't necessarily a directive. But tell me if I'm wrong. Will grant recipients have to follow *Davis Bacon* guidelines?

1:25:03

**Jennifer Duane:**

It's not a requirement, but it's encouraged. And then we have it as a selection factor if a project is proposing to pay prevailing wages.

**Katherine Bates:**

Yeah, it's important to read footnote nine in the NOFO.

1:25:23

**Jennifer Duane:**

Yeah. Davis Bacon is only a requirement if it's in the authorizing statute. It's not in this particular statute, so we can only encourage compliance. And it is a priority of the Biden administration. So, we are actually made it a selection factor in how we'll look at applications for award.

1:25:46

**Susannah Spellman:**

Here's another question, I think it's in one of the recent FAQs or upcoming. What specific language do you wish to see in the letter of commitment from the political subdivisions? A primary applicant as well as other political subdivisions within the consortium, is there a template?

1:26:02

**Jennifer Duane:**

There's not a template. We're just looking for any kind of language that basically indicates that the partners are committed to completing the project. It doesn't have to be very detailed. We're just looking for some indication that the members of the covered partnership, and any other collaborators in the project are fully committed – if we make an award – to ensuring that the project is completed.

1:26:31

Katherine, do you have any additional things to add?

1:26:38

**Katherine Bates:**

If it's a group of local governments who are coming together to do it, I mean a resolution. Anything that proves that the commitment's there, so particularly if you're coordinating with other governments entities, I think a resolution would be the best way of doing it. Letters of support work, but to have it official in public I think is important, that's coming from my local government background.

1:27:08

**Susannah Spellman:**

Right, and just to follow up, another question in that same vein. Should the commitment letter summarize what is addressed in the covered partnership agreement in terms of construction ownership and reporting responsibilities?

1:27:20

**Jennifer Duane:**

Yes, that would be helpful for us to know. Yep.

1:27:26

**Susannah Spellman:**

I'm still looking at the questions. I think we're about winding down here. They're not coming in fast and furious like they were earlier.

1:27:35

Again, I just want to re-iterate that that there are a lot of FAQs that have been posted [and] more coming this week. And that there will be a copy of the slides, a transcript, and the video that will be posted to the

BroadbandUSA website, specifically under the Grant Programs tab and broadband Infrastructure. So, definitely go and look there for more information as needed, and if you continue to have questions, send them to us. We are trying to address all of them as much as possible, and we know that the timeline is getting really tight right now. But thank you again for attending. Any last comments, Jennifer, Katherine, Yongming?

1:28:17

**Jennifer Duane:**

Nope.

1:28:19

**Katherine Bates:**

Exciting times. Exciting times.

1:28:24

**Yongming Qiu:**

Just one thing to add: don't wait until the last minute to submit the applications. I mention in every webinar, because sometimes grants.gov goes under maintenance. So, you want to make sure that your turn those applications in on time.

1:28:39

**Jennifer Duane:**

I think it is going down, but it's after our window closes. I think it's going to be doing some production work on August 23<sup>rd</sup> and 24<sup>th</sup>. It's good timing on our part.

**Susannah Spellman:**

I also wanted to mention, I have heard that grants.gov has some great training videos, and help desk, and resources there, too. So if you have specific questions about the forms, or the tool, or the application of Grants.gov (not our application per se) definitely look there, too. That can be a resource for you.

1:29:18

**Jennifer Duane:**

Yeah, they're a great helpdesk, it's open 24/7, and they've already helped a number of applicants that we're aware of, and they're standing by to help others as questions arise.

1:29:36

**Susannah Spellman:**

Thank you again everyone for spending this afternoon with us. Just a heads-up, tomorrow's webinar will be on the same topics. So, if you want to listen again, please sign up for tomorrow's webinar and have a great rest of the afternoon. Thank you.

1:29:51

**All:**

Thank you.

END TRANSCRIPT.