



# BEAD Final Proposal Guidance for Eligible Entities

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# PURPOSE AND OVERVIEW

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The purpose of this document is to outline the National Telecommunications and Information Administration (NTIA) Final Proposal Guidance to assist each Eligible Entity in submitting quality Final Proposals for the Broadband Equity, Access, and Deployment (BEAD) Program.

This document is intended solely to assist recipients in better understanding the Broadband Equity, Access, and Deployment (BEAD) Program and the requirements set forth in the Infrastructure Investment and Jobs Act, [Notice of Funding Opportunity \(NOFO\)](#), as modified by the [BEAD Restructuring Policy Notice \(RPN\)](#). This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO not modified by the RPN. In all cases, statutory and regulatory mandates, the terms and conditions of the award, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.

This document does not include detailed guidance for the Final Proposal Funding Request (FPFR), which includes the budget and budget narrative submitted along with the Final Proposal. The FPFR is a required submission that includes requirements set forth by NTIA and NIST to request funds pursuant to 47 U.S.C. § 1702(e)(3)(D)(ii)(III). See also BEAD NOFO at 46, § V.B.8. Guidance on the FPFR will be published by NTIA at a later date. The Eligible Entity's Final Proposal submission and FPFR submission must be consistent with each other. In other words, all requested uses of funds in the FPFR must comport with the information provided in the Final Proposal.

# INTRODUCTION

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## OVERVIEW OF THE FINAL PROPOSAL

The Final Proposal is the “final submission” for the Eligible Entity’s BEAD grant funding, and, among other things, should provide an update to the approved Initial Proposal, as modified by the BEAD Restructuring Policy Notice, on how each State and Territory will ensure that every resident has access to a reliable, high-speed broadband connection, drawing on all funding available to accomplish this goal, including but not limited to BEAD Program funds. The contents of the Final Proposal described in this guidance align with the BEAD Restructuring Policy Notice.

## OVERVIEW OF DOCUMENTS

The Final Proposal submission consists of the following documents:

1. **The Final Proposal:** The Final Proposal describes the results of the Eligible Entity’s deployment Subgrantee Selection Process. The Final Proposal should demonstrate that the Eligible Entity has adequately planned for, and will, implement a program that meets BEAD program objectives. The Eligible Entity will enter narrative responses and answer questions directly within the NTIA Grants Portal BEAD Final Proposal intake module, supplemented by attachment uploads.
2. **Final Proposal Data Attachments (CSV files):** These **five** (5) datasets capture how and where the Eligible Entity plans to serve locations validated as part of the Challenge Process and are the basis of the Final Proposal submission. The datasets will be submitted in CSV format using provided templates, and include:
  - Subgrantees (fp\_subgrantees.csv)
  - Deployment Projects (fp\_deployment\_projects.csv)
  - Locations (fp\_locations.csv)
  - No BEAD Locations (fp\_no\_BEAD\_locations.csv)
  - Community Anchor Institutions (fp\_cai.csv)

A completed *fp\_cai.csv* is only applicable if the Eligible Entity plans to serve Community Anchor Institution (CAI) locations. A completed *fp\_no\_BEAD\_locations.csv* is required to identify any Eligible Entity locations

that will not be covered by a BEAD project. Each Eligible Entity will upload the CSV files to the NTIA Grants Portal BEAD Final Proposal intake module.

3. **Final Proposal Attachments:** Each Eligible Entity will upload additional files to the NTIA Grants Portal BEAD Final Proposal intake module to satisfy the Final Proposal requirements. These attachments include:

*Required:*

- Accountability Documents
  - BEAD Program Monitoring Plan
  - Agency Policy Documentation
- EHP Plans

*Conditional:*

- Tribal Resolution Document(s)

*Optional:*

- Waiver Request

4. **The Final Proposal Funding Request:** A consolidated budget form and associated project plan/narrative to support the implementation of the Final Proposal. Each Eligible Entity will be required to submit a FPFR as a separate attachment and upload it as part of the Final Proposal package using the NTIA Grants Portal. FPFR requirements are set forth by NTIA and NIST to request funds pursuant to 47 U.S.C. § 1702 (e)(3)(D)(ii)(III).<sup>1</sup>

## FINAL PROPOSAL STRUCTURE

### FINAL PROPOSAL REQUIREMENTS SUMMARY

The BEAD NOFO outlines Final Proposal requirements, which have been modified or waived by the BEAD Restructuring Policy Notice. The table below summarizes the modifications to the Final Proposal requirements based on the BEAD Restructuring Policy Notice.

*Table 1: Final Proposal Requirements*

Final Proposal Requirement (#)	Description of Alignment to BEAD Restructuring Policy Notice
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<sup>1</sup> See also [BEAD NOFO](#) at 46, § IV.B.8.

<b>Final Proposal Data Submission</b>	<ul style="list-style-type: none"> <li>• Revises Subgrantees CSV file to remove data fields on types of service providers (non-traditional, Women Owned Business Enterprise (WBE), Minority Business Enterprise (MBE), and Small Business)</li> <li>• Revises Locations CSV file to remove data field on the Extremely High Cost Threshold</li> <li>• Requires submission of the No BEAD Locations CSV file</li> <li>• Revises the No BEAD Locations CSV file to include subcodes (financially incapable and excessive cost) for reason code 7</li> <li>• Removes Non-Deployment Projects CSV file</li> </ul>
<b>Subgrantee Selection Process Outcomes (1)</b>	<ul style="list-style-type: none"> <li>• Removes question on the Extremely High Cost Per Location Threshold</li> <li>• Includes question on revising eligible CAI lists to conform with Section 4 of the BEAD Restructuring Policy Notice</li> <li>• Revises guidance to require the Eligible Entity to describe how it conducted at least one additional “Benefit to the Bargain Round” and made applicants aware of the scoring rubric in Section 3.4 of the BEAD Restructuring Policy Notice</li> <li>• Revises guidance to remove examples referencing regulatory burdens (e.g., participation of non-traditional providers) addressed in the BEAD Restructuring Policy Notice</li> </ul>
<b>Timeline for Implementation (3)</b>	<ul style="list-style-type: none"> <li>• Removes question on non-deployment activities per Section 5 of the BEAD Restructuring Policy Notice</li> </ul>
<b>Oversight and Accountability Processes (4)</b>	<ul style="list-style-type: none"> <li>• Removes references to non-deployment activities Section 5 of the BEAD Restructuring Policy Notice</li> <li>• Adjusts references to reporting requirements per Section 2 of the BEAD Restructuring Policy Notice</li> </ul>
<b>Local Coordination (5)</b>	<ul style="list-style-type: none"> <li>• Removes submission of the Local Coordination Tracker Tool, per Section 2.4 of the BEAD Restructuring Policy Notice</li> <li>• Adjusts to focus on the public comment requirement.</li> </ul>

	<ul style="list-style-type: none"> <li>Updated question and guidance require the Eligible Entity describe its public comment period, which was previously in another section of the Final Proposal</li> </ul>
<b>Challenge Process Results (6)</b>	<ul style="list-style-type: none"> <li>No change</li> </ul>
<b>Unserved and Underserved Locations (7)</b>	<ul style="list-style-type: none"> <li>Adjusts to align to Section 4 of the BEAD Restructuring Policy Notice requirement to submit the No BEAD Locations CSV file</li> <li>Updates to include a reason code for not serving BEAD-eligible locations through a BEAD project due to excessive cost</li> </ul>
<b>Non-Deployment Uses (8) and Non-Deployment Subgrantee Selection Outcomes (9)</b>	<ul style="list-style-type: none"> <li>Removes requirement per Section 5 of the BEAD Restructuring Policy Notice</li> </ul>
<b>Participation of Non-Traditional Broadband Providers (10)</b>	<ul style="list-style-type: none"> <li>Removes requirement per Section 2.5 of the BEAD Restructuring Policy Notice</li> </ul>
<b>Implementations Status of Plans (11)</b>	<ul style="list-style-type: none"> <li>Removes requirements for utilization of minority businesses, women-owned business, and labor surplus area firms, per Section 2.1 of the BEAD Restructuring Policy Notice</li> <li>Removes requirement for middle-class affordability plans, per Section 2.6 of the BEAD Restructuring Policy Notice</li> <li>Adjusts questions and guidance to align to: <ul style="list-style-type: none"> <li>Section 2.1 of the BEAD Restructuring Policy Notice on compliance with federal labor and employment laws</li> <li>Section 2.2 of the BEAD Restructuring Policy Notice on broadband infrastructure reliability and resilience</li> <li>Section 2.7 of the BEAD Restructuring Policy Notice on the low-cost service option</li> </ul> </li> </ul>



<b>Substantiation of Priority Broadband Projects (12)</b>	<ul style="list-style-type: none"> <li>Adjusts question and guidance to align to Section 3.1 of the BEAD Restructuring Policy Notice to focus on the Eligible Entity’s methodology for applying the statute’s definition of “Priority Broadband Project”</li> </ul>
<b>Subgrantee Selection Certification (13)</b>	<ul style="list-style-type: none"> <li>Adjusts question and guidance to focus on how the Eligible Entity applied the scoring rubric outlined in Section 3.4 of the BEAD Restructuring Policy Notice</li> </ul>
<b>Environmental and Historic Preservation Documentation (14)</b>	<ul style="list-style-type: none"> <li><b>Adjusts guidance to note the requirement to use ESAPTT per Section 6 of the BEAD Restructuring Policy Notice</b></li> </ul>
<b>Consent from Tribal Entities (15)</b>	<ul style="list-style-type: none"> <li>No change</li> </ul>
<b>Prohibition on Excluding Provider Types (16)</b>	<ul style="list-style-type: none"> <li>Adjusts question and guidance in alignment with Section 2.5 of the BEAD Restructuring Policy Notice to certify adherence to baseline statutory requirement</li> </ul>

In contrast to the two volumes of the approved Initial Proposal, each Eligible Entity will **submit the Final Proposal in one submission**. The Final Proposal will describe the implementation of the plan each Eligible Entity submitted in its approved Initial Proposal, as modified by the BEAD Restructuring Policy Notice. Several Final Proposal requirements are interrelated, where the data submitted as part of Requirement 0 (Final Proposal Data Submission) will fulfill or support the information requested to satisfy other requirements. Therefore, the completeness and accuracy of the Final Proposal data submissions are fundamental to the assessment of the overall Final Proposal.

**The FPFR** is a separate package that an Eligible Entity must submit with its Final Proposal. The FPFR is composed of two required documents: (1) Project Plan/Narrative and (2) a Consolidated Budget Form. The contents of the FPFR must be updated from the approved Initial Proposal Funding Request (IPFR). The updated information provided in the FPFR will be used to determine if the specific award conditions (SACs) placed on the Eligible Entity’s award when the IP and IPFR were approved can be lifted based on the information provided. Additional FPFR submission guidance is forthcoming.

# FINAL PROPOSAL DEVELOPMENT, SUBMISSION, REVIEW AND APPROVAL

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## FINAL PROPOSAL DEVELOPMENT

The Eligible Entity will have 90 days from the issuance of the BEAD Restructuring Policy Notice to complete the following:

1. Complete Deployment Subgrantee Selection;
2. Meet with NTIA to review its deployment subgrantee selection outcomes;
3. Post the Final Proposal for a 7-day public comment period; and
4. Submit its Final Proposal to NTIA via the NTIA Grants Portal.

The Eligible Entity is strongly encouraged to utilize the support of its assigned Federal Program Officer for informal reviews and feedback while conducting the BEAD NOFO-mandated activities (as modified by the BEAD Restructuring Policy Notice) and drafting the Final Proposal. The Eligible Entity is also strongly encouraged to use NTIA's technical assistance documents linked in the section above. If the Eligible Entity needs further technical assistance beyond the documents linked above, it is encouraged to contact its Federal Program Officer.

The Infrastructure Act mandates a set of interim actions, detailed below, that the Eligible Entity must successfully complete prior to submitting its Final Proposal.

### CHALLENGE PROCESS

Once each Eligible Entity's Initial Proposal Volume I was approved and it had submitted its Initial Proposal Volume II, the Eligible Entity was permitted to initiate its Challenge Process. The Challenge Process was meant to finalize the list of unserved, underserved, and CAI locations that may be funded by the BEAD program. The Challenge Process supports the programmatic objective of BEAD to deploy service to unserved and underserved locations within each Eligible Entity's jurisdiction. For more details the Challenge Process, the Eligible Entity can also see the *BEAD Challenge Process Policy Notice* on the [BroadbandUSA website](#).

## *SUBGRANTEE SELECTION*

The Subgrantee Selection Process must follow the process approved in the Eligible Entity's Initial Proposal Volume II and align with the BEAD Restructuring Policy Notice. After resolving each challenge and at least 60 days before allocating grant funds for network deployment, an Eligible Entity must provide public notice of the final classification that was approved by NTIA of each unserved location, underserved location, or eligible CAI within the jurisdiction of the Eligible Entity.

Each Eligible Entity should expect to be in frequent dialogue with its Federal Program Officer during subgrantee selection, and will be expected to share, as a part of its monitoring obligations, progress made toward provisionally selecting subgrants that will accomplish program goals. Prior to submission of the Final Proposal, an Eligible Entity must have: (1) provisionally selected its subgrantees in accordance with the process in its approved Initial Proposal, as modified by the BEAD Restructuring Policy Notice, and (2) met with NTIA to review its deployment subgrantee selection outcomes after the completion of the deployment Subgrantee Selection Process (and prior to posting the draft Final Proposal for public comment). If the Eligible Entity has questions related to subgrantee selection, it should contact its Federal Program Officer immediately.

### **Addressing BEAD-Eligible Locations During Subgrantee Selection That Will Not Be Served by BEAD Funding**

In its Final Proposal, an Eligible Entity must investigate and account for locations that do not require BEAD funding using the reason code process as detailed in the Final Proposal Guidance. Specifically, Eligible Entities must remove locations that have been removed from Version 6 of the FCC Fabric (reason code 3), locations already served by an enforceable commitment (reason code 4), and locations already served by non-subsidized service (reason code 5) wherever possible and account for them in the Final Proposal. However, reason code 5 cannot be used for low-earth orbit satellite service.

Locations may only be excluded from a BEAD-funded subgrant for the reasons detailed in the guidance to Intake Question 7.7, and the Eligible Entity must maintain appropriate evidence to support the conclusion that those locations require no BEAD service. Evidence of no BEAD service is not provided to NTIA during Final Proposal submission, though NTIA may request evidence from the Eligible Entity at any point,

and will validate the use of reason codes when reviewing the Final Proposal. Eligible Entities must also certify in the Final Proposal that - to their knowledge - none of the BEAD funded BSLs should be classified under reason code 1 (should not have a broadband connection) or reason code 2 (do not need mass-market broadband service due to the nature of use). Eligible Entities must utilize reason codes 1, 2, and 3 for the entire period of performance by updating the no BEAD location list in Semi-Annual Reports (SARs), in accordance with the Final Proposal Guidance. Bead-eligible locations not being served through a BEAD project will be reflected in “fp\_no\_BEAD\_locations.csv” and are not subject to BEAD Program requirements.

Each Eligible Entity is required to run its Subgrantee Selection Process using the list of BEAD-eligible locations approved by NTIA in the “post\_challenge\_locations.csv” file. However, the Eligible Entity must modify its BEAD-eligible location list to include locations no longer served due to a default on a federal enforceable commitment where the federal entity has notified NTIA and the Eligible Entity of the default by the BEAD Restructuring Policy Notice publication date (June 6, 2025). NTIA will send each Eligible Entity, if applicable, a list of defaulted or newly eligible locations (e.g., federal enforceable commitment locations that were rescope) that qualify for BEAD within 14 calendar days of the publication of the BEAD Restructuring Policy Notice. The Eligible Entity must determine that these locations are not served by some other means (e.g., state enforceable commitment), certify that the locations are unserved or underserved, and incorporate these locations into their BEAD location list prior to accepting applications in subgrantee election.

At the conclusion of the Subgrantee Selection Process, every BEAD-eligible BSL<sup>2</sup> in the final list of eligible locations (either the approved Challenge Process list or the updated approved Challenge Process list) must be included in the Final Proposal either in the “fp\_locations.csv” file to indicate the BSL will be served as part of a BEAD project, or in the “fp\_no\_BEAD\_locations.csv” file to indicate it will not be served as

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<sup>2</sup> Such locations have a value of 0 or 1 in the “location classification” field of the file post\_challenge\_locations.csv. Some locations with value 2 may also appear in “fp\_locations.csv” file if they are part of a BEAD project. (“A “project” may constitute a single unserved or underserved broadband-serviceable location, or a grouping of broadband-serviceable locations in which not less than 80 percent of broadband-serviceable locations served by the project are unserved locations or underserved locations.” BEAD NOFO at 14.)

part of a BEAD project. Guidance in Requirement 7 further details the eligible reason codes that would apply to a BSL included in the “*fp\_no\_BEAD\_locations.csv*.”

Specifically for new enforceable commitments (reason code 4), if a federal entity notifies an Eligible Entity of an enforceable commitment after submission of Challenge Process results to NTIA, the Eligible Entity may object to the new enforceable commitment and proceed as if there is no enforceable commitment.<sup>3</sup> If the Eligible Entity either makes enforceable commitments under state-administered programs or does not object to new federal enforceable commitments upon notification by the awarding agency, it must apply one of the strategies described below to exclude the covered BEAD-eligible BSLs from the Subgrantee Selection Process.

When an Eligible Entity determines before Subgrantee Selection begins that BEAD-eligible locations may not be included in a BEAD project, the Eligible Entity may choose among the two permitted strategies listed below to notify applicants that the designated locations may not be served by BEAD, which applicants should factor into applications for BEAD deployment subgrants:

- **Separate:** The Eligible Entity may separate No BEAD Locations associated with any eligible reason code into separate project areas to notify applicants that the covered locations may not be served by BEAD. An Eligible Entity should avoid separating No BEAD Locations into a single, large project area and should instead separate these locations into compact and reasonable project areas. These separate project areas and accompanying locations must be listed in the “*fp\_no\_BEAD\_locations.csv*” file.

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<sup>3</sup> If the Eligible Entity becomes aware of a new federal enforceable commitment after submitted the Challenge Process results but before the Assistant Secretary approves those results, the Eligible Entity should notify its Federal Program Officer. Though the Eligible Entity has the right to object in this instance, it may determine after consultation with NTIA that the best path forward would be to deduplicate the new enforceable commitment before NTIA approves Challenge Process results.

The Eligible Entity should also notify its Federal Program Officer if the Eligible Entity make an enforceable commitment under a state-administered program after submitting the Challenge Process results but before the Assistant Secretary approves those results. Consultation with NTIA will help determine the best way to account for the new state-administered enforceable commitment and remove the covered locations from Subgrantee Selection

- **Indicate:** The Eligible Entity may identify No BEAD Locations associated with any eligible reason code as such (for example, by using an asterisk in the subgrantee selection portal or location map), so that applicants may account for them when applying to serve a project area. Indicating these locations notifies applicants of their status and the likelihood these locations will not be served by BEAD. These locations must be listed in the “*fp\_no\_BEAD\_locations.csv*” file.

When locations have been removed from Version 6 of the FCC Fabric (reason code 3) or will be served by an enforceable commitment (reason code 4), the Eligible Entity may, in addition to the two strategies listed above, choose to omit locations to prevent potential subgrantees from including the location in applications for BEAD deployment subgrants:

- **Omit:** The Eligible Entity may omit only locations removed from Version 6 of the FCC Fabric (reason code 3) or covered by a new enforceable commitment (reason code 4) from the BSL list used for conducting the Subgrantee Selection Process. These omitted locations must be listed in the “*fp\_no\_BEAD\_locations.csv*” file.
  - For enforceable commitments, the Eligible Entity omits locations at its own risk because if the enforceable commitment is not final at the time of Final Proposal submission the Eligible Entity is required to serve the covered locations through a BEAD project.

With the exception of locations for which reason codes 3 and 4 will apply, the Eligible Entity may not omit BEAD-eligible locations from the BSL list used for Subgrantee Selection or prohibit applicants from including them in their applications. This includes locations for which reason codes 1, 2, 5, and 6 may apply.

The Eligible Entity may not use the strategies above for reason code 7 (the Eligible Entity is financially incapable of service to an unserved or underserved location). The Eligible Entity may only use reason code 7 after it has completed Subgrantee Selection and has consulted with NTIA. The Eligible Entity is not permitted to indicate an inability to financially serve unserved or underserved locations to applicants during the Subgrantee Selection process. As such, the determination to use reason code 7 may only be made by the Eligible Entity after all applicants have submitted applications.

## *PUBLIC POSTING*

The Eligible Entity should post the Final Proposal narrative, accompanying attachments, and applicable CSV files for public comment. FPFR materials are not required to be posted for public comment. The Eligible Entity may submit its entire Final Proposal (including all CSV files, attachments, and FPFR) in NGP when it publishes the draft for public comment.

The Eligible Entity is strongly encouraged to seek guidance from its Federal Program Officer as needed in the development of its Final Proposal before it is published for public comment. NTIA encourages each Eligible Entity to utilize the format of the Final Proposal Intake Questions when posting its Final Proposals for public comment prior to submission to NTIA.

The Eligible Entity must describe a public comment period of no less than 7 days, provide a high-level summary of the comments received, and demonstrate how the Eligible Entity incorporated feedback in its Final Proposal submission, as applicable. The Eligible Entity is not required to respond to all individual comments but must note where public comments impacted the contents of the Final Proposal submission.

## *NGP SUBMISSION*

Each Eligible Entity can reference the NTIA Grants Portal clickpath that will be posted on the [BroadbandUSA website](#) to view instructions on how to submit the Final Proposal in the NTIA Grants Portal. If any Eligible Entity needs guidance on how to submit any portion of the Final Proposal, it should contact its Federal Program Officer and the NTIA Grants Portal Help Desk ([ngphelpdesk@ntia.gov](mailto:ngphelpdesk@ntia.gov)).

# APPLICATION REVIEW AND CURING

The Eligible Entity may be asked to address issues identified by NTIA during the review process. If the Eligible Entity is requested to address an issue identified in its Final Proposal, NTIA will contact the Eligible Entity via email. In the email, NTIA will identify the issue(s) found within the Final Proposal and the timeline for when the issue(s) must be resolved by the Eligible Entity.

Once the Eligible Entity has received the email of the issue(s) that need to be resolved for its Final Proposal to continue to be reviewed, the Eligible Entity should begin to resolve the issue(s) identified immediately. Failure to resolve the identified issue(s) will delay the review process.

## AWARD APPROVAL

NTIA will approve the Final Proposal and submit the Final Proposal package to NIST for final approval. Once NIST approves the Final Proposal package, the Assistant Secretary will notify the Eligible Entity that its Final Proposal has been approved. Once the Eligible Entity receives the notice of approval for its Final Proposal, the Eligible Entity will be able to access the remaining program funds identified in the Eligible Entity's Notice of Available Amounts to be used to implement the Eligible Entity's Final Proposal.<sup>4</sup>

## PREPARING FOR AWARD AND MONITORING

NTIA will release guidance on each Eligible Entity's continuing reporting requirements, including the post-Final Proposal Semi-Annual Reports (SARs). This guidance will include the information that NTIA expects to collect from each Eligible Entity at the award-, subgrantee-, project-, contract/subcontract-, and location-levels. It is critical that each Eligible Entity consider this guidance in designing its subgrantee solicitation and provisional award materials to ensure this data can be collected from subgrantees and provided to NTIA.

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<sup>4</sup> SACs may limit access to certain amounts of BEAD funding until particular conditions are met.



# FINAL PROPOSAL GUIDANCE BY REQUIREMENT

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## FINAL PROPOSAL DATA SUBMISSION

The Eligible Entity must submit data as comma separated values (CSV) files using templates provided by NTIA to document its deployment subgrantee selection outcomes. Not using the templates provided, making modifications to formulas, failing to fully complete all required fields, or changing the types of column content will result in NTIA rejecting the Final Proposal until curing is addressed. The templates can be found on the [BroadbandUSA website](#) and can also be provided by the Federal Program Officer supporting the Eligible Entity. The Eligible Entity may contact its assigned Federal Program Officer as it develops the CSV files to confirm the format, field names, and data types prior to submission. To prevent difficulties with data analysis, data fields in CSV files must not contain linebreaks.

The Eligible Entity must collect **data at the project level**, rather than aggregated by the subgrantee, to complete the CSVs. This structure is to ensure that each Location ID eligible for BEAD funding is mapped to a project using the project identified. For the Final Proposal requirements, the Eligible Entity must collect information from its subgrantees at the project level, and some subgrantees may be reporting on multiple projects.

**0.1 Attachment (Required):** Complete and submit the [Subgrantees](#) CSV file (named “*fp\_subgrantees.csv*”) using the NTIA template provided.

The purpose of the Subgrantees CSV file is to capture information related to the provisionally selected subgrantees. The CSV file must adhere to the data format specified in [Table 3](#) of the Appendix. Likewise, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file named “*fp\_subgrantees.csv*” as outlined in [Table 3](#) in the Appendix including:

1. **State or Territory:** two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity;
2. **Unique Entity Identifier (UEI):** SAM.gov assigned legal identifier of subgrantee;
3. **UEI Name:** registered name associated with the UEI record in SAM.gov;

4. **FRN:** 10-digit FCC Registration Number of the subgrantee, with leading zeroes

To download a copy of the NTIA Template for Subgrantees, please see the file named “*fp\_subgrantees.csv*.”

**0.2 Attachment (Required):** Complete and submit the [Deployment Projects CSV file](#) (named “*fp\_deployment\_projects.csv*”) using the NTIA template provided.

The purpose of the Deployment Projects CSV file is to capture the outcomes of the Subgrantee Selection Process, including details about planned deployment projects (including other than last-mile deployment projects), their scope, and their significance. This information helps NTIA understand the project’s objectives and expected outcomes.

For subgrantees that intend to implement *multiple* projects, list each unique project as a separate row and include a unique project identifier.

The CSV file must adhere to the data format specified in [Table 4](#) of the Appendix. Additionally, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file named “*fp\_deployment\_projects.csv*” as outlined in [Table 4](#) in the Appendix, including:

1. **State or Territory:** two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity;
2. **Project Name:** Eligibility Entity assigned project name;
3. **Project ID:** Eligible Entity assigned unique identifier;
4. **UEI:** SAM.gov assigned legal identifier of subgrantee;
5. **Project Description:** brief description of the project (max 1,000 characters);
6. **Project Type:** select a project category that best describes deployment activity (e.g., last-mile broadband deployment, CAI deployment project, middle-mile project, and MDU Wi-Fi project);
7. **Priority Broadband Project:** indicate whether the project is a Priority Broadband Project (Y) or not (N) based on the Eligible Entity’s application of the statutory definition of Priority Broadband Project.;
8. **Estimated Miles of Aerial Fiber Deployed:** anticipated number of aerial miles of fiber to provide service to the locations within the project

9. **Estimated Miles of Buried Fiber Deployed:** anticipated number of buried miles of fiber to provide service to the locations within the project
10. **Estimated Number of Jobs:** estimated number of employment opportunities created by the project;
11. **Estimated Subaward Date:** anticipated date of project execution (i.e., the date the subgrantee agreement is signed and active);
12. **Estimated Period of Performance Start Date:** anticipated date when the project will commence its period of performance;
13. **Estimated Period of Performance End Date:** anticipated date when the project will close its period of performance; must be after the project start date *and* before March 2, 2032;
14. **Tribal Intersection:** indicate whether or not any BSLs or CAIs funded by the project intersects Tribal territory (see [Requirement 15](#) for the NTIA Tribal Map Package that identifies Tribal areas for the purposes of the BEAD Program);
15. **Tribal Name(s):** name of the tribe(s) in whose territory the project will conduct activities;
16. **Projected BEAD Funding:** anticipated amount of BEAD funds used to complete the project, in USD;
17. **Fixed Amount Subaward:** indicate whether the subaward is a fixed amount subaward or not - *only applies to [last-mile] deployment projects*;
18. **Subgrantee Match:** total amount of cash and in-kind matching funds for the project to be provided by the subgrantee itself, in USD;
19. **Federal Match:** total amount of cash and in-kind matching funds for the project to be provided by match-eligible federal sources, in USD;
20. **State Match:** total amount of cash and in-kind matching funds for the project to be provided by the Eligible Entity, in USD;
21. **Other Match:** total amount of cash and in-kind matching funds for the project to be provided by other sources such as nonprofits organizations, in USD;
22. **Federal Match Source(s):** name of federal funding source(s) that is match eligible; and
23. **Notes:** optional notes about the project. For projects that have not been tentatively awarded, state the cause.

To download a copy of the NTIA Template for Deployment Projects, please see the file named “*fp\_deployment\_projects.csv*.”

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

The purpose of the Locations CSV file is to capture the final location data of all underserved and unserved locations eligible for BEAD funding after the Eligible Entity’s Challenge Process results are approved and the technical and performance aspects of the project. Each Location ID (BSL) must be associated with a specific Project ID. The CSV file must adhere to the data format specified in [Table 5](#) of the Appendix. Likewise, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file named “*fp\_locations.csv*” as outlined in [Table 5](#) in the Appendix including:

1. **Location ID:** unique identifier of the location from the Broadband Serviceable Location Fabric;
2. **Project ID:** Eligible Entity assigned unique identifier defined in the Deployment Project CSV;
3. **Location Classification:** indicate the category classifying the location as unserved, underserved, or served from the final list of eligible locations;
4. **Technology Code:** indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes;
5. **Upload Speed Anticipated:** planned maximum upload speed, in Mbps;
6. **Download Speed Anticipated:** planned maximum download speed, in Mbps; and
7. **Low Latency:** indicate whether the committed service meets the definition of low latency or does not meet the definition of low latency as defined in the BEAD NOFO.

To download a copy of the NTIA Template for Locations, please see the file named “*fp\_locations.csv*.”

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

The purpose of this No BEAD Locations CSV is to expand upon the reasons for not serving a BEAD-eligible location with a BEAD project provided in the Locations CSV. The CSV file must adhere to the data format specified in [Table 6](#) of the Appendix. Likewise, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file names “*fp\_no\_BEAD\_locations.csv*” as outlined in [Table 6](#) of the Appendix including:

1. **Location ID:** unique identifier of the location from the Broadband Serviceable Location Fabric;
2. **Location Classification:** the category classifying the location as unserved, underserved, or served from the final list of eligible locations;
3. **Reason:** reason, from a list, for not serving a location through a BEAD project;
4. **Non-BSL Code:** description of locations not being eligible BSLs, from a list, for not serving a location through a BEAD project, as applicable to the reason code selected;
5. **Location Type:** description of the location, from a list, for not serving a location through a BEAD project, as applicable to the reason code selected;
6. **Financial Type:** the financial reasoning for reason code 7
7. **Evidence Type:** the type of evidence maintained by the Eligible Entity to support the explanation of the reason code (evidence will not be submitted with the Final Proposal);
8. **Provider ID:** the unique 6-digit code generate by the FCC that identifies a service provider, as applicable to the reason code selected;
9. **Technology:** type of technology already provided to the location, using the FCC Broadband Data Collection technology codes, as applicable to the reason code selected;
10. **Program:** the state or federal enforceable commitment program, as applicable to the reason code selected;
11. **Challenge ID:** challenge identifier for the location challenge submitted to the FCC, as applicable to the reason code selected;
12. **Notes:** if needed, brief explanation of why locations should not receive service through a BEAD project.

To download a copy of the NTIA Template for No BEAD Locations, please see the file named “*fp\_no\_BEAD\_locations.csv*.”

**0.5 Question (Y/N):** If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)?

The Eligible Entity must indicate if it intends to use BEAD funds to serve any CAIs. If the Eligible Entity intends to use BEAD funds to serve any CAIs, it certifies that it ensures coverage to broadband service to all unserved and underserved locations, as identified projects upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2). This will serve as the Requirement 7 certification mandated by the BEAD NOFO.

**0.6 Attachment (Required - Conditional on a ‘Yes’ Response to Intake Question 0.5):** Complete and submit the CAIs CSV file (named “*fp\_cai.csv*”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity’s Challenge Process results.

The purpose of this CAIs CSV file is to capture the eligible CAIs, as documented in the Eligible Entity’s approved Challenge Process results and modified by the BEAD Restructuring Policy Notice, that will be served by a BEAD-funded project.

The Eligible Entity must revise their list of eligible CAIs to ensure their designations conform with the statutory definition of a CAI established by the Infrastructure Act. NTIA revokes the more expansive definition adopted by the BEAD NOFO. Per 47 U.S.C. § 1702(a)(2)(E), “the term ‘community anchor institution’ means an entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.” For BEAD purposes, a “community support organization” is an organization located in a government-owned facility that provides publicly accessible Internet service and currently offers digital skills training. NTIA will closely review all CAI submissions and reserves the right to reject any CAI designation.

The CSV file must adhere to the data format specified in [Table 7](#) of the Appendix. Likewise, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file named “*fp\_cai.csv*” as outlined in [Table 7](#) in the Appendix including:

1. **Type:** indicate the CAI location type;
2. **Entity Name:** official name of the CAI;
3. **Location ID:** unique identifier of the location from the Broadband Serviceable Location Fabric, if available;
4. **Project ID:** Eligible Entity assigned unique identifier;
5. **Street Address:** street number, street name, and any applicable prefix or suffix of the first address line (primary address) of the CAI;
6. **City:** full name of the city, town, municipality, or census designated place associated with address;
7. **State or Territory:** two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity;
8. **Zip Code:** five-digit USPS ZIP code associated with address, including any leading zeros;
9. **Latitude:** unprojected (WGS-84) geographic coordinate latitude in decimal degrees for the CAI, with a minimal precision of 4 decimal digits;
10. **Longitude:** unprojected (WGS-84) geographic coordinate longitude in decimal degrees for the CAI, with a minimal precision of 4 decimal digits;
11. **Technology Code:** indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes;
12. **Upload Speed Anticipated:** planned maximum upload speed, in Mbps; and
13. **Download Speed Anticipated:** planned maximum download speed, in Mbps;

The Eligible Entity must enter the address of the physical location of the CAI, not the administrative location. For example, the address must describe the location of the school building, not the board of education administrative building.

To download a copy of the NTIA Template for CAIs, please see the file named “*fp\_cai.csv*.”

# SUBGRANTEE SELECTION PROCESS

## OUTCOMES (REQUIREMENT 1)

**Relevant Instructions from the Infrastructure Act, 47 U.S.C. § 1702 (e)(4)(A)(i)(I):**

the eligible entity may submit a final proposal for the remainder of the amount allocated to the eligible entity ... that includes–

(I) a detailed plan that specifies how the eligible entity will–

(aa) allocate grant funds for the deployment of broadband networks to unserved locations and underserved locations, in accordance with subsection (h)(1)(A)(i); and

(bb) align the grant funds allocated to the eligible entity under subsection (c), where practicable, with the use of other funds that the eligible entity receives from the Federal Government, a State, or a private entity for related purposes

**Relevant Instructions from BEAD Restructuring Policy Notice Section 3.3, Pages 10 - 11:**

... NTIA is requiring Eligible Entities to conduct at least one additional subgrantee selection round for every BEAD-eligible location (the “Benefit of the Bargain Round”). The Benefit of the Bargain Round must permit all applicants - regardless of technology employed or prior participation in the program - to compete on a level playing field undistorted by the non-statutory regulatory burdens eliminated above. All subgrantee selection conducted after the release of this Policy Notice must comply with the terms of this Policy Notice.

Eligible Entities must rescind all preliminary and provisional subaward selections and notify applicants that a further round of applications will be considered before final awards are made. Eligible Entities that have already completed subgrantee selection must conduct at least one Benefit of the Bargain round. Eligible Entities have 90 days to comply with the obligations outlined within this Policy Notice and submit a Final Proposal that reflects the results of the Benefit of the Bargain round. This deadline replaces the deadline extensions previously granted in the Programmatic Waiver of the Final Proposal Deadline Requirements. NTIA will complete its review of each Final Proposal within 90 days of submission.



To the extent an Eligible Entity has a prequalification process, it must be reopened to all interested applicants, although the Eligible Entity may make prequalification submissions part of the application package. Existing qualified applicants do not need to resubmit prequalification documentation. If an applicant previously failed the prequalification process, it may choose to update its materials and seek prequalification again. Eligible Entities, however, must still ensure that applicants meet the financial and managerial capacity, technical and operational capability, and other requirements in 47 U.S.C. § 1702(g)(2)(A).

Where an applicant elects to stand on an existing subgrantee application received prior to the publication of this Policy Notice, that application shall be rescored under the rubric detailed below and may be awarded during the Benefit of the Bargain round, but no BEAD subgrantee will be permitted to recover costs to comply with the regulatory burdens eliminated in this Policy Notice. Existing applicants may also choose to submit a new application that eliminates the cost of these regulatory burdens in anticipation of competition from additional applicants. Eligible Entities must exclude all non-statutory regulatory burdens as identified above from the application and scoring processes for subgrantee selection. Eligible Entities must also allow applicants to propose to exclude select broadband serviceable locations (BSLs) that the applicant determines are excessively high-cost locations from the project area (or would otherwise make the project economically unviable for the technology being used).

**Relevant Instructions from the BEAD Restructuring Policy Notice Section 4, Page 14:**

Eligible Entities must revise their list of eligible Community Anchor Institutions (CAIs) to ensure their designations conform with the statutory definition of a CAI as established by IIJA (47 U.S.C. §1702(a)(2)(E)). NTIA hereby revokes the more expansive definition adopted by the NOFO (NOFO, Section I.C.(f), pgs. 11-120). NTIA will closely review all CAI submissions and will narrowly interpret the term “community support organization” as used in the statute. NTIA reserves the right to reject any CAI designation.

The purpose of this section is for the Eligible Entity to provide data on the allocation of grant funds in adherence with its approved Initial Proposal, as modified by the BEAD Restructuring Policy Notice, and document the outcomes of the Subgrantee Selection

Process. It requires the Eligible Entity to provide a transparent and detailed account of how it fulfilled its commitments in a fair, open, and competitive manner. Each Eligible Entity must demonstrate that the outcomes of its process prioritized serving unserved locations first, underserved locations second, and (if applicable) CAIs last. The Eligible Entity must also show that its process aligned BEAD grant funds with other funds for broadband that the Eligible Entity receives from the federal government, an Eligible Entity, or any other source.

**“(f)(1) Deployment Projects”**

References in this document to “(f)(1) deployment projects” refer to 47 U.S.C. § 1702(f)(1), which states that an Eligible Entity may use BEAD grant funds to competitively award subgrants for unserved service projects and underserved service projects.

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

The Eligible Entity must execute its deployment Subgrantee Selection Process consistent with its approved Initial Proposal, as modified by the Restructuring Policy Notice. NTIA will monitor consistency between the Subgrantee Selection Process approved in the Eligible Entity’s Initial Proposal and the BEAD Restructuring Policy Notice and the execution of that process. As with any award term, NTIA may impose remedies for noncompliance with the terms of the approved Initial Proposal and BEAD Restructuring Policy Notice, potentially including the disallowance of noncompliant costs incurred by the Eligible Entity.

In instances where the Eligible Entity requires a correction to its approved Initial Proposal, beyond the Initial Proposal correction process detailed in the BEAD Restructuring Policy Notice, the Eligible Entity must notify NTIA as soon as possible and adhere to NTIA guidance. Failure to notify NTIA of changes to the process described in its approved Initial Proposal may result in rejection of the Eligible Entity’s Final Proposal, among other consequences.

To provide an adequate response, the Eligible Entity must consider its deployment subgrantee selection timelines, phases, project area definitions, evaluation procedures, and strategies to ensure universal coverage among other elements of its deployment Subgrantee Selection Process.

The Eligible Entity must describe how the Subgrantee Selection Process undertaken was consistent with that approved in the Initial Proposal, as modified by the BEAD Restructuring Policy Notice.

If the Eligible Entity has completed or is in the process of completing its Subgrantee Selection Process at the time of the release of the BEAD Restructuring Policy Notice, the Eligible Entity must use this section to describe how it conducted at least one additional “Benefit of the Bargain Round” for every BEAD-eligible location. The Eligible Entity must detail how it conducted the “Benefit of the Bargain” round, including how it addressed prequalification (if applicable) and resubmission of applications.

**1.2 Text Box:** Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

Final Proposals will be evaluated against the specific steps identified in the Eligible Entity’s approved Initial Proposal, as modified by the BEAD Restructuring Policy Notice, and any other corrections as approved by NTIA.

The Eligible Entity must provide a description of the steps that it took to ensure a Subgrantee Selection Process that is fair, open, and competitive. This should include a description of the Eligible Entity’s state or territory procurement policies and procedures and the internal controls that facilitated the Eligible Entity’s oversight of each phase of the process.

The Eligible Entity must describe steps it took to ensure a **fair** process, including safeguards against each of the following:

- Collusion;
- Bias;
- Conflicts of interest;
- Arbitrary decisions; and
- Other actions that would undermine confidence in the process.

Examples of steps an Eligible Entity could take to ensure a fair process include, but are not limited to:

- Evidence that all applicants had access to the scoring rubric prior to submitting applications;
- Evidence of consistent application of scoring criteria by qualified reviewers;
- Samples of training materials provided to reviewers, including training on how to report conflicts of interest;
- Description of how reviewers documented their review findings to provide a rationale for their scoring assessments;
- Descriptions of the Eligible Entity's policy and/or internal controls to identify and mitigate conflicts of interest, including methods to prevent, report, and resolve conflict of interest concerns during application review and award;
- Descriptions of the Eligible Entity's oversight procedures to ensure application of a consistent standard of review across reviewers;
- Descriptions of the Eligible Entity's policy and/or internal controls to identify and mitigate instances of collusion, including instances of collusion between potential applicants and collusion between applicants and Eligible Entity staff, contractors, or other persons involved in the deployment Subgrantee Selection Process;
- Descriptions of the use of a pre-application process (if applicable); and/or
- Evidence that all applicants had the same opportunity to cure their applications (if applicable).
- Evidence that applicants were notified and had access to the Eligible Entities updated scoring rubric and other guidance following the release of the BEAD Restructuring Policy Notice and before conducting further rounds of subgrantee selection.

The Eligible Entity must include how the deployment Subgrantee Selection Process was **open** by describing how the Eligible Entity provided adequate public notice to potential subgrantees to facilitate participation by a wide variety of potential applicants, to ensure an open and competitive process, and to prevent favoritism, collusion, and abuse.

Examples of steps an Eligible Entity could take to ensure an open process include, but are not limited to:

- Evidence that all eligible participants defined in the Eligible Entity's approved Initial Proposal were permitted to participate;

- Evidence that all applicants had the same amount of time to apply between the public notice and deadline (or the Eligible Entity describes instances when application extensions were granted and provides a rationale for this determination), and the deadline did not place an unreasonable burden on applicants to submit an application;
- A communication plan that promotes participation from a wide variety of potential applicants;
- A description of the ways an Eligible Entity removed barriers or provided financial incentives.

The Eligible Entity must also describe how it ensured the deployment Subgrantee Selection Process was **competitive**, such as by using a competitively neutral evaluation criteria that did not favor one type of provider over another, except certain preferences expressed neutrally and in advance.

Examples of steps an Eligible Entity could take to ensure a competitive process include, but are not limited to:

- Evidence that different types of providers were able to submit competitive applications;
- Evidence that the Eligible Entity only engaged in provider-specific outreach after at least one round of applications were submitted (i.e., in the case of areas that received no applications or for the purposes of deconfliction);
- A description that the Eligible Entity's curing requests did not impose unreasonably burdensome timelines that certain providers would be at a disadvantage to address;
- A description of how the project deconfliction process was transparently communicated to applicants and fairly applied; and/or
- A description of how the Eligible Entity's process to adjust the scope of submitted applications followed the steps in the approved Initial Proposal and the BEAD Restructuring Policy Notice.

Additionally, the Eligible Entity must describe the processes in place to ensure reviewers were trained, qualified, and objective. The Eligible Entity must describe how reviewers were identified, including how the State Broadband Office assessed reviewers' qualifications and potential conflicts of interest (including what it did to avoid even the appearance of conflicts of interest), whether contractors were utilized,

and whether different reviewers were used to review individual components of the applications (e.g., certified professional engineers reviewing applicants' network designs). The Eligible Entity must demonstrate that it ensured the quality of each review, including reviewer oversight procedures. If applicable, the Eligible Entity must describe how a review committee or final approval by a governing body factored into the review process.

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

When there were initially no applications to serve a location or group of locations that are unserved and underserved, the Eligible Entity must affirm that it followed a procedure consistent with the process approved in the Initial Proposal, as modified by the BEAD Restructuring Policy Notice.

The Eligible Entity should contact its assigned Federal Program Officer if it has questions whether the incentive strategies considered in these instances align with the Eligible Entity's approved Initial Proposal and BEAD Restructuring Policy Notice.

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

If applicable, Eligible Entity must describe its methodology for revising its list of eligible CAIs to conform with the statutory definition of a CAI as established by the Infrastructure Act. The Eligible Entity shall not propose to serve a CAI that does not meet the statutory definition (i.e., a CAI that fits an additional category that was approved in the Eligible Entity's Initial Proposal Volume I).

If the Eligible Entity is not proposing to fund any CAIs, it may note 'Not Applicable.'

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

The Eligible Entity must certify that it will retain all subgrantee records for a period of at least three (3) years from the date of closeout of the relevant subgrant and in accordance with 2 C.F.R. § 200.334. 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.

If the Eligible Entity cannot certify this, the Eligible Entity should contact its assigned Federal Program Officer. The Eligible Entity should note that responding ‘No’ for this question may result in an extended timeline for NTIA’s review and approval of the Final Proposal through curing.

# TIMELINE FOR IMPLEMENTATION (REQUIREMENT 3)

## Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include...:

3. A timeline for implementation of the detailed plan and completion of each project and other eligible activity to be funded.

## Relevant Instructions from BEAD NOFO Section IV.D.2.c., Page 74:

Prospective subgrantees must submit a network design, diagram, project costs, build-out timeline and milestones for project implementation, and a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project. An Eligible Entity shall not approve any grant for the deployment or upgrading of network facilities unless it determines that the materials submitted to it demonstrate the prospective subgrantee's technical capability with respect to the proposed project.

## Relevant Instructions from BEAD NOFO Section II.B, Page 18:

As established in [47 U.S.C. § 1702(h)(4)(C)], subgrantees that receive BEAD Program funds for network deployment must deploy the planned broadband network and 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 from the Eligible Entity.

All planned deployment projects that **have** been selected and approved should have anticipated start and end dates listed in the *fp\_deployment\_projects.csv* submission, which indicates that each project will be completed within four years of the receipt of the subgrant.

**3.1 Text Box:** Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the



subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

The Eligible Entity must affirm that it will ensure that each BEAD subgrantee will begin to provide services to customers that desire broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant.

The Eligible Entity also must affirm that it will ensure that all BEAD-funded subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance. For example, each Eligible Entity can satisfy this requirement by explaining its monitoring process, highlighting its speed to deployment commitments in its Subgrantee Selection Process, or creating binding agreements with its subgrantees. All of the Eligible Entity's subgrants must end at least 120 days prior to the end of the Eligible Entity's own period of performance, to allow sufficient time for the Eligible Entity to close out all of its subgrants in an orderly fashion prior to the end of its own period of performance. In that connection, the Eligible Entity also must clearly articulate that it will ensure that all BEAD grant activities that it has undertaken itself (including via contract) are completed by the end of its own period of performance.

The Eligible Entity must affirm that it will ensure each subgrantee reaches key milestones in their submitted proposals/documentation. In doing so, the Eligible Entity affirms that it will ensure subgrantees that made specific commitments in response to the "speed to deployment" scoring criteria meet the timelines stated in their applications. Each Eligible Entity must affirm that it will ensure the completion of all BEAD activities within the mandated timeframes, which may include the Eligible Entity's requirements for subgrantee reporting and accountability.

# OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4)

## **Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 47:**

The Final Proposal must include...:

4. Processes for oversight and accountability to ensure the proper use of the grant funds allocated to the Eligible Entity under the BEAD Program consistent with Section IX.G of this NOFO.

## **Relevant Instructions from BEAD NOFO Section IV.C.1.b, Page 51:**

In addition to demonstrating how it expects to satisfy the subrecipient monitoring and management requirements identified in 2 C.F.R. Part 200 Subpart D, each Eligible Entity must include sufficient accountability procedures within its program to ensure subgrantee compliance with all applicable Program requirements. Each Eligible Entity must, at a minimum, include in any subgrant agreement reasonable provisions allowing for recovery of funds in the event of a subgrantee's noncompliance with the BEAD Program's requirements, including but not limited to failure to deploy network infrastructure in accordance with mandated deadlines. Each Eligible Entity must, at a minimum, employ the following practices: (1) 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); (2) the inclusion of clawback provisions (i.e., provisions allowing recoupment of funds previously disbursed) in agreements between the Eligible Entity and any subgrantee; (3) timely subgrantee reporting mandates; and (4) robust subgrantee monitoring practices. NTIA will review proposed subgrant processes during the Initial Proposal and Final Proposal review phases and will reject Proposals that fail to provide sufficient recourse against subgrantees that do not fulfill their legal and contractual responsibilities. NTIA likewise will pursue clawback of funds directly from Eligible Entities that fail to ensure subgrantee accountability to the fullest extent of the law.

## **Relevant Instructions from BEAD NOFO Section IX.G.1, Page 95-96:**

NTIA, Eligible Entities, and subgrantees each have a critical role to play in ensuring that the BEAD Program is implemented in a manner that ensures transparency, accountability, and oversight sufficient to, among other things:

1. Minimize the opportunity for waste, fraud, and abuse;
2. Ensure that recipients of grants under the Program use grant funds to further the overall purpose of the Program in compliance with the requirements of the Infrastructure Act, this NOFO, 2 C.F.R. Part 200, the terms and conditions of the award, and other applicable law; and
3. Allow the public to understand and monitor grants and subgrants awarded under the Program.

To that end, NTIA and Eligible Entities shall:

1. Conduct such audits of grantees and subgrantees as are necessary and appropriate, including audit requirements described in Section VII.G. Eligible Entities shall report the full results of any audits they conduct to the appropriate Federal Program Officer.
2. Develop monitoring plans, subject to the approval of the Assistant Secretary, which may include site visits or desk reviews, technical assistance, and random sampling of compliance requirements.
3. Impose specific conditions on grant awards designed to mitigate the risk of nonperformance where appropriate.

Each Eligible Entity and/or subgrantee shall, as appropriate:

1. Comply with the reporting requirements set forth in Section I.E of this NOFO.
2. Comply with the obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions.
3. Establish and widely publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. Eligible Entities and subgrantees shall produce copies of materials used for such purpose upon request of the Federal Program Officer.

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

The Eligible Entity does not need to have a waste, fraud, and abuse hotline specific to its broadband office - any statewide hotline is sufficient. If the Eligible Entity does not have a public hotline at the time of its Final Proposal submission, the Eligible Entity should respond 'No' and contact its Federal Program Officer.

The Eligible Entity should understand that responding 'No' for this question may result in an extended timeline for NTIA's review and approval of its Final Proposal.

#### 4.2 Attachments: Upload the following two required documents:

- (1) BEAD program monitoring plan;
- (2) Agency policy documentation which includes the following practices:
  - a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and
  - b. Timely subgrantee (to Eligible Entity) reporting mandates.

The Eligible Entity must upload the required documents listed above. The Eligible Entity must describe a robust and timely monitoring plan, detailing how it will ensure subgrantee accountability for the BEAD funding subgrantees receive through at least semiannual reporting for the duration of the subgrant.

The Eligible Entity should note that under the BEAD Uniform Guidance exceptions, commercial entity subgrantees are **not** subject to 2 C.F.R. 200.501(f) but are subject to 2 C.F.R. 200.501(g), which establishes the pass-through entity as responsible for subgrantee audit compliance. In other words, non-federal entities must comply with the single audit requirement (spending \$750,000 of federal grants in a year) but commercial entities do not have such requirement **unless** that Eligible Entity requires it. The Eligible Entity should consider these standard requirements in developing the requirements for its subgrantees.

#### BEAD Program Monitoring Plan

Examples of details in a BEAD program monitoring plan include, but are not limited to:

- Detailing how subgrantees will comply with the terms and conditions of the award including the Infrastructure Act, BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, the terms of the Eligible Entity's specific BEAD

award including any SACs, the BEAD Program General Terms and Conditions, award amendments, and applicable laws and regulations;

- Detailing how the Eligible Entity will ensure subgrantees implement projects on schedule and make adequate progress toward achieving identified metrics, milestones, goals, objectives, and planned outcomes;
- Detailing how the Eligible Entity will ensure subgrantees meet financial and programmatic reporting requirements, adhere to submission deadlines, and provide accurate information;
- Detailing how the Eligible Entity will ensure subgrantees expend Federal funds as authorized within the period of performance; and/or
- Detailing how the Eligible Entity will monitor subgrantees to ensure the project is completed on time, and limit potential waste, fraud, and abuse of federal funding.

The Eligible Entity should refer to forthcoming NTIA guidance on completing its BEAD Program Monitoring Plan.

### **Agency Policy Documentation**

Within its agency policy documentation, the Eligible Entity must detail its reimbursement policy for deployment projects, or in the case of fixed amount subawards, its disbursement agreement based on milestone met, unit built, or project complete. Additionally, the Eligible Entity must include clawback provisions to which subgrantees will be subject. The Eligible Entity must also include the reporting cadence in which subgrantees will be required to submit materials to the Eligible Entity.

Examples of details that can be in the agency policy documentation include, but are not limited to:

- The timeline for how the Eligible Entity will distribute funds to the subgrantee for all deployment projects consistent with specific deadlines established by its award;
- The timeline for how subgrantees will report progress to the Eligible Entity;
- Established justifications the Eligible Entity may use to withhold reimbursement of funding to the subgrantee, or in the case of fixed amount subawards, to clawback funding; and/or

- Which entity within the state/territory is responsible for determining when the Eligible Entity can clawback funding (*i.e.*, the state's Chief Information Office).

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

- 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;
- Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- 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;
- Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- 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);
- 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
- 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.

The Eligible Entity's obligations in this regard include the responsibility under 2 C.F.R. § 300.332 to ensure that all necessary BEAD conditions are included in each subgrant agreement. The Eligible Entity must certify, by selecting 'Yes,' that its subgrant agreements will include all required components to comply with the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice. Prior to provisionally selecting

subgrantees, each Eligible Entity must publicly post a template/draft of its broadband deployment subgrant agreement for transparency purposes, to demonstrate that all required components, including alignment to the BEAD Restructuring Policy Notice, are included.

## LOCAL COORDINATION (REQUIREMENT 5)

### **Relevant Instructions from the Infrastructure Act, 47 U.S.C. 1702 § (e)(4)(A)(ii):**

The local coordination requirements ... shall include, at minimum, an opportunity for political subdivisions of an eligible entity to–

- (aa) submit plans for consideration by the eligible entity; and
- (bb) comment on the initial proposal of the eligible entity before the initial proposal is submitted to the Assistant Secretary.

### **Relevant Instructions from the BEAD Restructuring Policy Notice Section 2.4, Page 6:**

NTIA concludes that an Eligible Entity shall satisfy this requirement [local coordination] by certifying that it observed the Final Proposal public comment requirements and received plan submitted by political subdivisions up until submission of the Final Proposal to NTIA.

The purpose of this section is to detail how an Eligible Entity has coordinated with communities within its jurisdiction after submitting its Initial Proposal. The Infrastructure Act establishes minimum requirements for coordination with political subdivisions of the Eligible Entity. The Eligible Entity is required to (1) allow political subdivisions to submit local broadband plans for consideration and (2) participate in the public comment period.

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

The response must demonstrate Eligible Entity met the following requirements:

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

Upon the conclusion of its public comment period, the Eligible Entity must describe how it conducted a public comment period for no less than 7 days and how political subdivisions of the Eligible Entity were provided with an opportunity to participate. The Eligible must also provide a high-level summary of the comments received and demonstrate how the Eligible Entity incorporated feedback in its Final Proposal submission, as applicable. The Eligible Entity is not required to respond to all



individual comments but must capture where public comments impacted the contents of the Final Proposal submission.

# CHALLENGE PROCESS RESULTS (REQUIREMENT 6)

## Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include...:

5. Description of the results of the challenge process conducted by the Eligible Entity under Section IV.B.6.

The purpose of this section is to ensure that the Eligible Entity has successfully accomplished the following objectives based on its Challenge Process results:

- Identified enforceable commitments funded by the federal government or by the Eligible Entity, within the jurisdiction of the Eligible Entity, to deploy qualifying broadband (including on Tribal Lands).
- Identified each unserved, underserved, and served location within the Eligible Entity in its final list of eligible locations.

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

The Eligible Entity must certify, by selecting ‘Yes,’ that it has successfully completed the BEAD Challenge Process and received written approval of its results from NTIA. It is not permissible for the Eligible Entity to begin the deployment Subgrantee Selection Process without first obtaining NTIA approval of its Challenge Process results. If the Eligible Entity did not successfully complete the Challenge Process and receive written approval of the results of the Challenge Process from NTIA, select ‘No.’ The Eligible Entity should note that responding ‘No’ for this question will result in an extended timeline for NTIA’s review and approval of the Final Proposal through curing.

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

The Eligible Entity must provide an active URL link to where the Eligible Entity has publicly posted the final location classifications. The link must not be broken, missing, or incorrect, and information must be downloadable/readable.

The Eligible Entity must provide public notice of final classification of each unserved location, underserved location, and eligible CAI at least 60 days before allocation grant funds for network deployment (BEAD NOFO page 35). This is a legal requirement that each Eligible Entity funding broadband deployment projects must fulfill under 47 U.S.C. § 1702(h)(2)(B).

# UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7)

## Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include...:

7. Certification that the Eligible Entity will provide service to all unserved and underserved locations, if the Eligible Entity is seeking to use BEAD funding for deployment to CAs or for other eligible activities.

The purpose of this section is to ensure that all unserved and underserved locations, as identified upon conclusion of its Challenge Process as required under 47 U.S.C. § 1702(h)(2), will be served. The accurate identification of unserved and underserved locations is essential to achieving the goals of the BEAD program of universal coverage. The responses in this section must match the information provided in the Eligible Entity's submitted CSV files.

Each Eligible Entity has an obligation to ensure universal coverage to all unserved and underserved locations, as identified in its final list of eligible locations. The Eligible Entity should refer to the guidance in the [Subgrantee Selection](#) section of this document to address locations not requiring BEAD subsidy during subgrantee selection.

In any case where a BEAD-eligible location is identified as not being served through a BEAD project, an Eligible Entity will be required to explain the reason for not including these locations and maintain evidence that supports this explanation. Each Eligible Entity will be required to select from a list of reason codes for each BEAD-eligible location that will not be served through a BEAD project. Identifying each of those locations in the Final Proposal will allow each Eligible Entity to affirm it has met its universal coverage obligations (see BEAD NOFO Section IV.B.7.b), while efficiently using its BEAD allocation and preventing overbuilding.

Eligible Entities must investigate and account for locations that do not require BEAD funding using the reason code process as detailed below. Specifically, locations that have been removed from Version 6 of the FCC Fabric (reason code 3), locations already served by an enforceable commitment (reason code 4), and locations already

served by non-subsidized service (reason code 5) must be utilized by Eligible Entities wherever possible and accounted for in the Final Proposal. However, reason code 5 cannot be used for low-earth orbit satellite service. NTIA will validate that these reason codes have been exercised when reviewing Final Proposals.

Eligible Entities must also certify in the Final Proposal that, to the best of their knowledge, none of the BEAD-funded locations should be classified under reason code 1 (should not have a broadband connection) or reason code 2 (do not need mass-market broadband service due to the nature of use). Eligible Entities must utilize reason codes 1, 2, and 3 for the entire period of performance, meaning these locations should be continuously descope from deployment projects as the Eligible Entity becomes aware of discrepancies between the time the Final Proposal is submitted and the completion of a deployment project. These locations should be reported to NTIA via the Semi-Annual Report (SAR).

If the Eligible Entity believes that a Broadband Serviceable Location should be removed from the Fabric, it must submit a location challenge to the FCC as soon as possible.<sup>5</sup> It should not wait until the preparation of the Final Proposal. If the Fabric has not been updated yet, the Eligible Entity must indicate the FCC location challenge identifier when using reason codes 1 or 2.

The requirements for Eligible Entities to maintain evidence to justify not serving a location through a BEAD project are further described in this section below. **The Eligible Entity will not submit the evidence in its Final Proposal, but Eligible Entities should be prepared to provide evidence for NTIA review, as requested.**

### **Coverage of Unserved Locations**

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

The Eligible Entity must certify, by selecting ‘Yes,’ that it will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified by the

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<sup>5</sup> Note that the definition of a CAI location differs for the FCC Fabric and the definitions in the Eligible Entity’s approved Initial Proposal. FCC Challenges to CAIs must follow the FCC definition of CAIs.



Eligible Entity's NTIA-approved final list of eligible locations. By selecting 'Yes,' the Eligible Entity certifies that there is, for every unserved location, either a BEAD project or an appropriate reason code for not serving a location through a BEAD project.

If the Eligible Entity is financially incapable (reason code 7, sub-code F) of serving any unserved locations by a BEAD project, it must select 'No.'

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

**7.3 Attachment (Optional):** If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

If the Eligible Entity uses reason code 7 in the *No BEAD Locations* CSV file, the Eligible Entity must use this section to provide its rationale and explain its determination that it is financially incapable of serving an unserved location or that costs to serve an unserved location would be unreasonably excessive.

If the Eligible Entity does not use reason code 7 in the *No BEAD Locations* CSV file for unserved locations, note 'Not Applicable' for Question 7.2 and do not upload any files for Question 7.3.

### **Coverage of Underserved Locations**

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

The Eligible Entity must certify, by selecting 'Yes,' that it will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified by the Eligible Entity's NTIA-approved final list of eligible locations. By selecting 'Yes,' the Eligible Entity certifies that there is, for every underserved location, either a BEAD

project or an appropriate reason code for not serving a location through a BEAD project.

If the Eligible Entity is financially incapable (reason code 7, sub-code F) of serving any underserved location by a BEAD project, it must select 'No.'

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

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

If the Eligible Entity uses reason code 7 in the No BEAD Locations CSV file, the Eligible Entity must use this section to provide its rationale and explain its determination that it is financially incapable or serving an underserved location or that costs to serve an underserved location would be unreasonably excessive.

If the Eligible Entity does not use reason code 7 in the No BEAD Locations CSV file for underserved locations, note 'Not Applicable' for Question 7.5 and do not upload any files for Question 7.6.

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

The Eligible Entity must certify, by selecting ‘Yes,’ that it 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 below, to justify its determination that there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. The Eligible Entity will not submit evidence with the Final Proposal submission.

If a location will not be served through a BEAD project, that location is not subject to BEAD Program requirements.

#### *Reason Codes, Evidence Objectives, and Examples*

Eligible Entities must investigate and account for locations that do not require BEAD funding using the reason code process. Specifically, locations that have been removed from Version 6 of the FCC Fabric (reason code 3), locations already served by an enforceable commitment (reason code 4), and locations already served by non-subsidized service (reason code 5) must be utilized by Eligible Entities wherever possible and accounted for in the Final Proposal. The table below details each reason code that the Eligible Entity must select in the *fp\_no\_BEAD\_location.csv* file. In noting a location with a reason for not being served through a BEAD project, the Eligible Entity must maintain evidence that meets the objectives described below. If the Eligible Entity cannot produce evidence that maintains these standards, its identification of not serving such locations through a BEAD project will be denied. Examples of such evidence are provided, with recommended specifications for each evidence type provided below this table. If the example evidence is not available, the Eligible Entity should obtain the clearest and most compelling evidence possible that accomplishes the evidentiary objective, and be prepared to discuss those locations with NTIA prior to Final Proposal submission.

The Eligible Entity does not have to collect all types of evidence listed for each reason code or sub-code. However, FCC location challenge IDs are required for each location where indicated by the reason code.



Reason codes 1, 2, 3, and 6 may be used in the future for locations associated with subgrant projects when the Eligible Entity identifies a location that falls within one of the reasons. This will be addressed during Semi-Annual Reports.

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
1: Location should not have a broadband connection	D: Location has been demolished and is not expected to be rebuilt	Evidence must demonstrate that the location is not a business or residential location at which fixed broadband Internet access service is, or can be, installed and there is not a demand for such service	<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner (e.g., zoning or land use change)</li> <li>• Photographic evidence</li> <li>• FCC location challenge ID (Type 6)</li> </ul>
	B: Residential location is not habitable		<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner</li> <li>• FCC location challenge ID (Type 6)</li> </ul>
	U: Location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a nearby building		<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner</li> <li>• Photographic evidence</li> <li>• FCC location challenge ID (Type 6)</li> </ul>
	M: Location is intended to be mobile and has not been permanently		<ul style="list-style-type: none"> <li>• Attestation from property owner</li> <li>• Photographic evidence</li> </ul>

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
	installed in its current location (e.g., it is an RV or boat)		<ul style="list-style-type: none"> <li>FCC location challenge ID (Type 6)</li> </ul>
	R: Location is not a building but a land or natural formation, such as a large rock or collection of hay bales		<ul style="list-style-type: none"> <li>Attestation from property owner</li> <li>Photographic evidence</li> <li>FCC location challenge ID (Type 6)</li> </ul>
	Z: Location is not serviceable for another reason		<ul style="list-style-type: none"> <li>Evidence not specified; to be collected as applicable to the reason</li> <li>FCC location challenge ID (Type 6)</li> </ul>
2: Location does not need mass-market broadband service due to the nature of use	C: CAI location	Evidence must demonstrate that the location does not have a demand for mass-market broadband service	<ul style="list-style-type: none"> <li>Attestation unit of government or property owner</li> <li>Photographic evidence clearly showing the nature and use of the location</li> <li>FCC location challenge ID (Type 4)</li> </ul>
	E: Enterprise location		<ul style="list-style-type: none"> <li>Attestation from unit of government or property owner</li> </ul>

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
			<ul style="list-style-type: none"> <li>• Photographic evidence clearly showing the nature and use of the location</li> <li>• FCC location challenge ID (Type 4)</li> </ul>
	P: Government property		<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner</li> <li>• Photographic evidence clearly showing the nature and use of the location</li> <li>• FCC location challenge ID (Type 4, referring to the location as either a CAI or an enterprise)</li> </ul>
3: Location has been removed from Version 6 of the Fabric by the FCC	N/A	Evidence that the location is no longer on Version 6 of the Fabric as of the time of Final Proposal submission	Validation against Version 6 of the Fabric
4: Location is already served by an enforceable commitment	State enforceable commitment	Evidence must demonstrate that the location is already served, or planned to be served, with qualifying broadband	<ul style="list-style-type: none"> <li>• Name of the state grant program</li> <li>• The Eligible Entity attests in the Final Proposal that it has properly accounted</li> </ul>

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
			for state enforceable commitments
	Federal enforceable commitment (BIP, CAFII, CPF, EACAM, RDOF, RECONNECT, SLFRF, TBCP1, TBCP2)		<ul style="list-style-type: none"> <li>Name of the federal grant program</li> <li>NTIA to validate through collaboration with other federal agencies</li> </ul>
5: Location is already served by non-subsidized service (privately funded network). Cannot be used for service by low-earth orbit satellite	N/A	Only for locations with qualifying broadband service in the current National Broadband Map. Evidence must unequivocally demonstrate that the location is already served with qualifying broadband (is currently connected or can be connected within 10 business days of a request with a standard installation fee).	<ul style="list-style-type: none"> <li>Evidence of subscription (service record)</li> <li>Photographic evidence of infrastructure</li> <li>Network diagram</li> <li>Speed test</li> <li>Attestation from the provisional awardee that it concurs to not accept a BEAD project for the location(s)</li> </ul>
6: Other	N/A	Evidence must demonstrate that the location is not a broadband serviceable location, is already served, or otherwise does not have demand for broadband service for a	Evidence not specified; to be collected as applicable to the reason. There will be a high bar for this category; the Eligible Entity is encouraged to discuss these locations

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
		reason that does not meet one of the reasons described above	as early as possible with NTIA and establish evidence standards
7: The Eligible Entity is financially incapable of serving an unserved or underserved location	F: Financially incapable	The Eligible Entity must demonstrate, through its overall Final Proposal submission, that it provisionally selected deployment subawards in a manner that prioritizes priority broadband service to the most locations possible and prioritized serving unserved locations first	Evidence incorporated throughout Final Proposal submission
	X: Excessive cost		

### *Evidence Best Practices*

The Eligible Entity must document that the evidence was collected within a reasonable time period of the Eligible Entity ascertaining that it applies to the respective unserved or underserved location. All evidence must be legible; electronic evidence must be stored in commonly used data formats. Each piece of documentation must depict the type of evidence indicated by the Eligible Entity in the “evidence type” column of the *fp\_no\_BEAD\_locations.csv* file.

If the Eligible Entity is supplying a reason for not serving a location on Tribal Land with a BEAD project, the Eligible Entity must also maintain clear and unambiguous evidence that the Tribal Government concurs with the Eligible Entity’s determination and collected evidence.

The list below details minimum standards to assist the Eligible Entity in collecting evidence that indisputably demonstrates that the location meets the criteria identified by the Eligible Entity for not being served through a BEAD project.

- **Photographic Evidence:** Photographic evidence must be a JPEG file, timestamped and geocoded with two decimal digits resolution for the seconds part of longitude and latitude. The photo should show a terrestrial (street-level) view. Only if the Eligible Entity is restricted from accessing the location, it may rely on aerial or satellite images but needs to justify why terrestrial photographic evidence could not be collected.
- **Attestation by a Unit of Local or Tribal Government:** An attestation by a unit of local or Tribal government, agency of the federal government, or other government entity owning the location must be dated and retained as a PDF file. Attestations for locations on Tribal Lands must be made by a representative of the Tribal government. The signatory must be identified by title as a representative of the unit of local or Tribal government or federal government agency. The signature may be either digital or scanned. If a single attestation applies to multiple locations, the attestation should list all Location IDs.
- **Attestation by Private Property Owner:** An attestation by a private property owner should be retained as a PDF file. It should contain a date and a digital or scanned signature. If a single attestation applies to multiple locations, it should list all street addresses or Location IDs.
- **Land use or zoning change:** Documentation of a land use or zoning change should include an attestation by a unit of government for the jurisdiction.
- **Evidence of Subscription (Service Record):** Evidence of subscription must be preserved as a PDF file and must contain a date. Any personally identifiable information should be redacted. The evidence of subscription should indicate the service address, service provider, the technology type, and the speed tier.
- **Network Diagram:** A network diagram should include an attestation by an officer of the provider.
- **Network Speed Test:** The speed test results can be recorded in a PDF or CSV file. Speed tests can use any of the applications named in NTIA Model Challenge Process or the Eligible Entity's Initial Proposal Volume I.

**7.10 Question (Y/N):** Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or

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

The Eligible Entity must certify that it 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.

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

## **Cost and Barrier Reduction:**

### **Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 48:**

The Final Proposal must include...

11. Implementation status of plans described in the Initial Proposal related to:

- a. Steps that the Eligible Entity has taken or intends to take to promote streamlined permitting processes and cost-effective access to poles, conduits, easements, and rights of way, including the imposition of reasonable access requirements;

## **Compliance with Labor Laws**

Relevant Instructions from the Infrastructure Act, 47 U.S.C. § 1702 (h)(1)(A)(iv)(IV)

(A) IN GENERAL. - An eligible entity, in awarded subgrants for the deployment of a broadband network using grant funds received under this section, as authorized in subsection (f)(1) - ...

(iv) shall give priority to projects based on- ...

(IV) a demonstrated record of and plans to be in compliance with Federal labor and employment laws.

### **Relevant Instructions from the BEAD Restructuring Policy Notice Section 2.1, Page 4:**

NTIA hereby eliminates the non-statutory requirements in the NOFO related to labor, employment, and workforce development... Specifically, NTIA hereby eliminates the following sections of the NOFO: “Fair Labor Practices and Highly Skilled Workforce”; “Advancing Equitable Workforce Development and Job Quality Objectives”; and “Civil Rights and Nondiscrimination Law Compliance” (BEAD NOFO, Section IV.C.1.e-g, pgs. 56-62). The related Initial Proposal and Final Proposal requirements and the corresponding reporting requirements are also eliminated



(BEAD NOFO, Section IV.B.5.b.11-13, pg. 32, and BEAD NOFO, Section IV.B.9.b.11.b-c, pg. 48 and BEAD NOFO, Section VII.E.2.9,12, pgs. 90-92). The “Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms” section is also eliminated (BEAD NOFO, Section VII.D.7, pgs. 88-89).

### **Low-Cost Service Option**

**Relevant Instructions from the Infrastructure Act, 47 U.S.C. § 1702 (h)(4)(B):**

(4) DEPLOYMENT AND PROVISION OF SERVICE REQUIREMENTS. - An entity that receives a subgrant under subsection (f)(1) for the deployment of a broadband network—...

(B) shall offer not less than 1 low-cost broadband service option for eligible subscribers, as those terms are defined in paragraph (5) of this subsection;

### **Relevant Instructions from the BEAD Restructuring Policy Notice Section 7, Pages 6-8:**

NTIA hereby eliminates the non-statutory requirements in the NOFO related to the BEAD low-cost broadband service option (LCSO). Specifically, NTIA hereby eliminates the “Affordability and Low-Cost Plans” section of the NOFO and the related Initial Proposal and Final Proposal requirements to the extent they are inconsistent with this Policy Notice (BEAD NOFO, Section IV.C.2.c.i, pg. 66-68 and BEAD NOFO, Section IV.B.5.b.16, pg. 32 and BEAD NOFO, Section IV.B.9.b.11.d, pg. 48).

BEAD subgrantees must still comply with the statutory provision to offer at least one LCSO, but NTIA hereby prohibits Eligible Entities from explicitly or implicitly setting the LCSO rate a subgrantee must offer (Subgrantees must also still comply with the statutory and NOFO requirements pertaining to service level.) To be clear, NTIA will only approve Final Proposals that include LCSOs proposed by the subgrantees themselves. Finally, NTIA also hereby modifies the eligible subscriber definition (below) to align it with the Federal Communications Commission’s (FCC) Lifeline Program and other Federal assistance programs.

#### **a. LCSO Service Requirements**

Consistent with IIJA, Eligible Entities shall require potential BEAD subgrantees to propose an LCSO as part of their applications that meets certain speed and performance criteria. As required by IIJA and the NOFO, the

LCSO must offer speeds of at least 100/20 Mbps and latency performance of no more than 100 milliseconds. Applicants that already offer a low-cost plan that meets these service requirements may satisfy the LCSO requirement by proposing to offer their existing low-cost plan to eligible subscribers.

#### **b. Eligible Subscriber Definition**

IJJA directs NTIA to define “eligible subscriber” for the BEAD low-cost broadband service option. The NOFO adopted the eligibility requirements of the FCC’s Affordable Connectivity Plan which is no longer operational. Accordingly, NTIA hereby redefines “eligible subscriber” to match the eligibility criteria for the FCC’s Lifeline Program. This eligibility change aligns the BEAD LCSO requirement with an existing communications affordability program as well as other Federal benefit qualifications for low-income Americans. The definition of an Eligible Subscriber for the LCSO stated in the NOFO is hereby stricken and is replaced with the following:

Eligible Subscriber–The term “Eligible Subscriber” means any household seeking to subscribe to broadband internet access service that is eligible for the FCC’s Lifeline Program (Lifeline eligible criteria are defined in 47 C.F.R. §54.409).

BEAD subgrantees are responsible for verifying LCSO eligibility and may ask potential subscribers to provide the same documentation necessary to confirm eligibility as is required under the Lifeline program.

#### **Network Reliability and Resilience**

##### **Relevant Instructions from the Infrastructure Act, 47 U.S.C. § 1702**

(1) SUBGRANTEE OBLIGATIONS. - A subgrantee, in carrying out activities using amounts received from an eligible entity under this section—...

(C) shall incorporate best practices, as defined by the Assistant Secretary, for ensuring reliability and resilience of broadband infrastructure;

##### **Relevant Instructions from the BEAD Restructuring Policy Notice Section 2.2, Pages 4-5:**

NTIA hereby eliminates the requirements in the NOFO related to climate change, which prioritized the prior Administration’s radical environmental social agenda at the expense of swift and efficient broadband deployment. Specifically, NTIA hereby eliminates the “Climate Resilience” section of the NOFO (NOFO, Section IV.C.1.h,

pgs. 62-64.) and the related Initial Proposal and Final Proposal requirements (NOFO, Section IV.B.5.b.15, pg. 32, and NOFO, Section IV.B.9.b.11.e, pg. 48).

Subgrantees shall satisfy the statutory requirement to incorporate best practices defined by NTIA for ensuring reliability and resilience of broadband infrastructure by establishing risk management plans that account for technology infrastructure reliability and resilience, including from natural disasters (e.g., wildfires, flooding, tornadoes, hurricanes, etc.), as applicable, as well as cybersecurity best practices (See, e.g., National Institute of Standards and Technology Framework for Improving Critical Infrastructure Cybersecurity, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations, NIST 800- 161 Rev.1 and Key Practices in Cyber Supply Chain Risk Management: Observations from Industry, NIST IR 8276).

The purpose of this requirement is to ensure the Eligible Entity is making progress towards the implementation of plans approved in its Initial Proposal, as modified by incorporating the BEAD Restructuring Policy Notice. This requirement also aims to ensure each Eligible Entity is continuing to implement plans to reduce costs and barriers to deployment, account for network reliability and resilience, and address eligible subscribers' access to affordable broadband service options.

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

The Eligible Entity will respond by indicating either: 'Complete,' 'In Progress,' or 'Not Started' to describe the implementation of its plans regarding reducing costs and barriers to deployment.

If needed, the following documents can be utilized as a reference resource:

The Eligible Entity can refer to the permitting resources on the [NTIA BEAD website](#), including the [Permitting Best Practices: Case Studies](#) for additional information to incorporate in its response.

The [Permitting Best Practices: Case Studies](#) outlines case studies and examples of streamlining permitting, including Broadband Ready Communities, E-Permitting, and Rights-of-Way.

The [Permitting Needs Assessment](#) contains a checklist of four major permitting categories, including Rights-of-Way, Pole Attachments, Conduit Access, and Environment Planning/Historic Preservation.

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

The Eligible Entity must certify, by selecting ‘Yes,’ that it required subgrantees to certify compliance with federal labor and employment laws.

If the Eligible Entity indicates ‘No,’ the Eligible Entity must answer Intake Question 11.3, and provide an explanation for this response. The Eligible Entity should note that responding ‘No’ to this question will result in an extended timeline for NTIA’s review of the Final Proposal.

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

*Intake Question 11.3 will only appear in NGP if the Eligible Entity responds ‘No’ to Intake Question 11.2.*

**11.4 Question (Y/N):** Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.<sup>6</sup>

If all subgrantees will be required to offer a low-cost broadband service option for the duration of the Federal interest period, please select ‘Yes.’

If all subgrantees will not be required to offer a low-cost broadband service option for the duration of the federal interest period, please select ‘No.’ The Eligible Entity

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<sup>6</sup> The federal interest period for BEAD-funded broadband infrastructure projects is ten years after the year in which the relevant subgrant has been closed out in accordance with 2 C.F.R. § 200.344. See General Terms and Conditions for NTIA BEAD Program Funds at 21 (Apr. 2024), [https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD\\_IPFR\\_GTC\\_04\\_2024.pdf](https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf).

should note that responding ‘No’ to this question will result in an extended timeline for NTIA’s review of the Final Proposal.

**11.5 Text Box (Optional - Conditional on a ‘No’ Response to Intake Question 11.4):** If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period, explain why the Eligible Entity was unable to do so.

*Intake Question 11.5 will only appear in NGP if the Eligible Entity responds ‘No’ to Intake Question 11.4.*

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

The Eligible Entity must certify, by selecting ‘Yes,’ that it focused on ensuring the reliability and resilience of BEAD-funded broadband infrastructure when selecting subgrantees.

If the Eligible Entity indicates ‘No,’ the Eligible Entity must answer Intake Question 11.7, and provide an explanation for this response. The Eligible Entity should note that responding ‘No’ to this question will result in an extended timeline for NTIA’s review of the Final Proposal.

**11.7 Text Box (Optional - Conditional on a ‘No’ Response to Intake Question 11.6):** If the Eligible Entity does not certify that subgrantees have ensured planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

*Intake Question 11.7 will only appear in NGP if the Eligible Entity responds ‘No’ to Intake Question 11.6.*

# SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS (REQUIREMENT 12)

## **Relevant Instructions from the Infrastructure Act, 47 U.S.C § 1702(a)(1)(I):**

(I) PRIORITY BROADBAND PROJECT.–The term “priority broadband project” means a project designed to–

- (i) provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine; and
- (ii) ensure that the network built by the project can easily scale speeds over time to–
  - (I) meet the evolving connectivity needs of households and businesses; and
  - (II) support the deployment of 5G, successor wireless technologies, and other advanced services.

## **Relevant Instructions from the Infrastructure Act, 47 U.S.C. § 1702 (h)(1)(A)(ii):**

...in providing funding under .., [Eligible Entity] shall prioritize funding for deployment of broadband infrastructure for priority broadband projects

## **Relevant instructions from the BEAD Restructuring Policy Notice Section 3.1, Pages 8-10:**

IIJA requires Eligible Entities to prioritize funding for “priority broadband projects.” The statute defines a priority broadband project as one designed to:

- (i) provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine; and
- (ii) (ii) ensure that the network built by the project can easily scale speeds over time to -
  - a. meet the evolving connectivity needs of households and businesses; and
  - b. support the deployment of 5G, successor wireless technologies, and other advanced services

Any applicant may seek to have the Eligible Entity treat its application as a Priority Broadband Project regardless of the technology used. The applicant’s project, however, must still meet the required speed and latency standards set forth in the

statute and the NOFO and demonstrate that it meets the additional statutory criteria, including that the project can easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies. Applicants must provide supporting documentation sufficient for the Eligible Entity to assess the network application and determine that the proposed network architecture for each specific project area meets this standard.

Eligible Entities may not categorically exclude any given technology and may only reject treatment of an application as a Priority Broadband Project if the project could not meet the statutory definition for a specific project area. As discussed in Section 3.4 below, NTIA reserves the right to reverse an Eligible Entity's determination that a project does or does not meet the standard for a Priority Broadband Project if such determination is unreasonable.

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

The Eligible Entity must describe its methodology for determining whether a project is a Priority Broadband Project, and how it applied this methodology consistently across all applications.

Because of their on-the-ground familiarity with unserved areas in their jurisdiction, Eligible Entities are given significant leeway in determining which project proposals meet the definition of a Priority Broadband Project. To properly make this determination, an Eligible Entity must establish a review methodology that addresses each component of the statutory definition of a Priority Broadband Project and that can be fairly applied to assess all proposed projects that request Priority Broadband Project Status. Although an Eligible Entity must apply its Priority Broadband Project review standard in a fair and indiscriminate manner, an Eligible Entity may determine that a given application using a certain technology is not a Priority Broadband Project for one particular project area but is a Priority Broadband Project for another particular project area. For example, in applying its review methodology, an Eligible Entity could determine that the relevant technology cannot easily scale to meet evolving connectivity needs in one project area but can easily scale in another project area.

What follows are examples of how an Eligible Entity may analyze a proposal - both as a standalone proposal tailored to serve a specific project area and in light of all proposals submitted by the same applicant across the state - to determine if it meets all statutory criteria for a Priority Broadband Project.

- 1. Provides broadband service at speeds of no less than 100/20 Mbps with latency less than or equal to 100 milliseconds:**
  - a. Review applicants' network design and diagrams to determine that the proposed project meets the minimum speed and latency standards.
  - b. For example, an Eligible Entity may determine that an applicant with several project proposals across the state may not merit Priority Broadband Project status for all proposals if a proposed technical capability showing is not sufficiently tailored to a given project area.
- 2. Can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services:**
  - a. *Project Area Geography (Including Topography):*
    - i. Consider the natural and physical features of a project area (including weather patterns) when determining the suitability of a proposed project.
    - ii. For example, assess tree coverage or threats to infrastructure in a project area that would make certain applications a priority over others.
  - b. *Project Area Density:*
    - i. Consider the number of people or BSLs in the proposed project area when determining the suitability of a proposed project.
    - ii. For example, assess the concentration of BSLs in a project area that would make certain applications nonpriority due to lack of scalability.
  - c. *Statewide Capacity:*
    - i. Consider the capacity of an applicant to meet the Priority Broadband Project definition if awarded for all proposed BEAD projects statewide.
    - ii. For example, explain why an application that may be considered a Priority Broadband Project for a discrete project area is ultimately designated a non-Priority Broadband Project after reviewing the



applicant's proposals across the Eligible Entity and assessing the technological capacity to scale service over time that meets all Priority Broadband Project criteria.

- iii. An Eligible Entity may determine that an applicant lacks capacity to deliver Priority Broadband for every project it applied for in the state. In cases where an Eligible Entity determines that an applicant cannot deliver Priority Broadband service to all locations for which it applied due to capacity concerns an Eligible Entity may still consider one or more discrete proposals from the applicant as Priority Broadband Projects because the smaller number of locations will alleviate the capacity concerns.

NTIA will afford reasonable deference to each Eligible Entity's methodology for determining Priority Broadband Project status based on the characteristics of individual project areas within its jurisdiction. An Eligible Entity may not make a blanket determination for a technology on a statewide basis.

The Eligible Entity will note which projects are identified as Priority Broadband Projects in the *fp\_deployment\_projects.csv* file.

# SUBGRANTEE SELECTION CERTIFICATION (REQUIREMENT 13)

Relevant Instructions from the BEAD Restructuring Policy Notice Section 3.4,  
Page 12:

Eligible Entities shall score competing applications using the following criteria:

**Primary Criteria.** In deciding among competing applications covering the same general project areas, Eligible Entities must choose the option with the lowest cost based on minimal BEAD Program outlay.

**Minimal BEAD Program Outlay.** The Eligible Entity must select the combination of project proposals with the lowest overall cost to the Program. This may involve selecting a proposal that is not the lowest-cost option for a given set of BSLs but is part of the combination of selected projects with the lowest overall cost to the Program. When comparing competing proposals, Eligible Entities shall assess the total BEAD funding that will be required to complete the project (i.e., the total project cost minus the applicant's proposed match) and the cost to the Program per location (i.e., the total BEAD funding that will be required to complete the project divided by the number of BSLs the project will serve).

**Secondary Criteria.** If an application to serve the same general project area proposes a project cost within 15% of the lowest-cost proposal received for that same general project area on a per BSL basis, the Eligible Entity must evaluate such competing applications based on the following three criteria. The relative weighting of these three criteria shall be at the discretion of the Eligible Entity:

**Speed to Deployment.** The prospective subgrantee's binding commitment to provision service by a date certain that is earlier than four years after the date on which the subgrantee will receive the subgrant from the Eligible Entity subject to contractual penalties to the Eligible Entity. Greater consideration can be awarded to prospective subgrantees promising an earlier service provision date.

**Speed of Network and Other Technical Capabilities.** Eligible Entities may weigh the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.

**Preliminary/Provisional Subgrantees.** For locations where Eligible Entities have already identified preliminary or provisionally selected subgrantees, Eligible Entities may give additional weight to those applications in the Benefit of the Bargain Round.

The purpose of this section is to ensure the Eligible Entity followed the BEAD Restructuring Policy Notice to award subgrants through a fair, open, and competitive process. This section also aims to ensure that the level of benefits (i.e., a particular score, additional points in scoring criteria, lowest cost) given to provisionally selected subgrantees align with the commitments the prospective subgrantees provided the Eligible Entity.

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

The Eligible Entity must describe the following:

1. A summary of how the Eligible Entity applied the “Minimal BEAD Program Outlay” scoring criteria to each competitive application
2. If secondary criteria were applicable according to the BEAD Restructuring Policy Notice, a summary of how the Eligible Entity applied the criteria, (i.e., how points were assigned within each criterion) and identify the corresponding weights assigned to each criterion:
  - Speed to deployment; and
  - Speed of network and other technical capabilities as defined by the Eligible Entity;
  - For locations where Eligible Entities have already completed their subgrantee selection process and identified preliminary or provisionally selected subgrantees, Eligible Entities will give additional weight to Preliminary/Provisional Subgrantees.

# ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) DOCUMENTATION (REQUIREMENT 14)

## **Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 48:**

The Final Proposal must include...:

14. Environmental documentation associated with any construction and/or ground-disturbing activities and a description of how the Eligible Entity will comply with applicable environmental and historic preservation requirements.

## **Relevant Instructions from BEAD Restructuring Policy Notice Section 6, Page 15:**

To support NTIA's goal of issuing National Environmental Policy Act (NEPA) approvals within two weeks for an estimated 90 percent of BEAD projects and eliminate approximately 3-6 months of environmental processing per project, all Eligible Entities are hereby required to use the Environmental Screening and Permitting Tracking Tool (ESAPTT) within the NTIA Grants Portal. ESAPTT will help Eligible Entities serve as joint lead agencies for NEPA reviews by identifying applicable categorical exclusions and enabling paperless transmission of environmental documents and generation of draft and final NEPA documents. NTIA will generate ESAPTT project records from BEAD subgrant award data, which must identify any awards containing multiple NEPA project areas. Eligible Entities are further encouraged to use ESAPTT's permitting tracking capacity to evaluate and track subrecipient NEPA milestone schedules and escalate Federal right-of-way permitting issues to NTIA for interagency resolution.

The purpose of this section is to ensure that the Eligible Entity provides information on how it will ensure subgrantees will comply with environmental and historic preservation requirements including but not limited to the National Environmental Policy Act of 1969 (42 U.S.C. 4321, *et seq.*) (NEPA), Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470 *et seq.*) (NHPA), Section 7 of the Endangered Species Act (16 U.S.C. 1521, *et seq.*), Section 404 of the Clean Water Act (33 U.S.C. 1251, *et seq.*), and all other applicable Federal, state, and local environmental laws and regulations.

It is a BEAD program imperative to ensure that projects are in environmental compliance and a condition of the award that each Eligible Entity is a joint lead agency for NEPA.

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

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/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.

Within a document (file type to be decided by Eligible Entity) the Eligible Entity must provide the following:

- **Environmental and Historic Preservation Requirements:** A 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.

- **Joint Lead Agency Responsibility Summary:** A statement of the Eligible Entity's understanding of its obligations as a joint lead agency to implement NEPA requirements under 42 U.S.C. 4336a and a description of the Eligible Entity's plan to prepare and/or supervise the preparation of all required environmental analyses and review documents.
- **Description of FirstNet Regional PEIS Evaluation:**
  - Identification of the relevant First Responder Network Authority (FirstNet) PEIS chapter pertinent to the Eligible Entity, and a concise evaluation of the sufficiency of the environmental analysis contained in the relevant FirstNet Regional PEIS (see [Sample evaluation memo](#)), updating any information necessary for the NEPA analysis contained in the FirstNet Regional PEIS to apply to the Eligible Entity's subgrant broadband deployment projects.
- **Specific Award Conditions (SACs) Description:** A description of the Eligible Entity's current or planned use of SACs and/or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects are awaiting final NEPA approval. For example, this may include utilizing an EHP-focused SAC attached to subgrantee awards that are anticipated to require ground-disturbing activities.

# CONSENT FROM TRIBAL ENTITIES (REQUIREMENT 15)

## Relevant Instructions from BEAD NOFO Section IV.B.9.b, Page 48:

The Final Proposal must include...:

15. To the extent an Eligible Entity's Final Proposal includes plans to deploy broadband to Unserved Service Projects or Underserved Service Projects on Tribal Lands, the Eligible Entity must submit a Resolution of Consent from each Tribal Government, from the Tribal Council or other governing body, upon whose Tribal Lands the infrastructure will be deployed.

The purpose of this section is to ensure that proper guidelines, regulations, and Tribal consent with respect to Tribal Lands were followed for deployment projects on Tribal Lands. For the program's specific instructions on obtaining Tribal consent in the case of consortia, projects in Hawaii, and projects in Alaska, please refer to footnote 70 on page 48 of the BEAD NOFO.<sup>7</sup>

The Eligible Entity should reference the [NTIA Tribal Map](#) Package to view Tribal areas. For instances in which the map package contradicts location information derived directly from the Tribe, the Eligible Entity should obtain a letter from the Tribe indicating which mismatched locations are on and off Tribal Land and submit the letter to NTIA. The NTIA Tribal Map package includes the following layers:

- **Alaska Native Villages:** This layer represents Alaska Native Villages and is created by Census. The layer was downloaded on Jan. 28, 2025, from here: [TIGER/Line® Shapefiles](#).
- **Native Hawaiian Areas:** This layer represents Native Hawaiian Areas and is created by Census. The layer was downloaded on Jan. 28, 2025, from here: [TIGER/Line® Shapefiles](#) and has been filtered to only include Native Hawaiian Areas.
- **BIA AIAN National LAR:** This layer represents American Indian Lands and is created by the BIA. The layer was accessed here: [BIA Access Open Data](#) and was

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<sup>7</sup> This guidance does not supersede state or territory-specific waivers previously granted pertaining to Tribal consent.

exported on Jan. 28, 2025. The layer was filtered to only include lands across the continental U.S.

- **BIA AIAN LAR Supplemental:** This layer is a supplemental dataset to the LAR. The layer was accessed here: BIA Access Open Data and was exported on Jan. 28, 2025.
- **BIA AIAN Tribal Statistical Areas:** This layer represents Tribal Statistical Areas located in Oklahoma. The layer was accessed here: BIA Access Open Data and was exported on Jan. 28, 2025.

This map package is based on data available when it was created on Jan. 28, 2025.

The map package was created using ArcGIS Pro 3.4.0. If you have any questions regarding the map package please e-mail [NTIAanalytics@ntia.gov](mailto:NTIAanalytics@ntia.gov).

## Resources

- Census Data<sup>8</sup>
- BIA Open Data<sup>9</sup>

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<sup>8</sup> Census Use Restraints: The TIGER/Line Shapefile products are not copyrighted however TIGER/Line and Census TIGER are registered trademarks of the U.S. Census Bureau. These products are free to use in a product or publication, however acknowledgement must be given to the U.S. Census Bureau as the source. The boundary information in the TIGER/Line Shapefiles are for statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement and they are not legal land descriptions. Coordinates in the TIGER/Line shapefiles have six implied decimal places, but the positional accuracy of these coordinates is not as great as the six decimal places suggest.

<sup>9</sup> BIA Data Disclaimer: By using this product, the user agrees to the below terms and conditions:

No warranty is made by the Bureau of Indian Affairs (BIA) for the use of the data for purposes not intended by the BIA. This GIS Dataset may contain errors. There is no impact on the legal status of the land areas depicted herein and no impact on land ownership. No legal inference can or should be made from the information in this GIS Dataset. The GIS Dataset is prepared strictly for illustrative and reference purposes only and should not be used, and is not intended for legal, survey, engineering or navigation purposes.

These data have been developed from the best available sources. Although efforts have been made to ensure that the data are accurate and reliable, errors and variable conditions originating from source documents and/or the translation of information from source documents to the systems of record continue to exist. Users must be aware of these conditions and bear responsibility for the appropriate use of the information with respect to possible errors, scale, resolution, rectification, positional accuracy, development methodology, time period, environmental and climatic conditions and other circumstances specific to these data. The user is responsible for understanding the accuracy limitations of the data provided herein.



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

If the Eligible Entity did not have any cases where deployment on Tribal Lands is to take place, the Eligible Entity will not upload a document for this Intake Question in NGP.

If the Eligible Entity has any deployment project taking place on federally recognized Tribal Lands the Eligible Entity must provide a Resolution of Consent (in PDF format) from each Tribal Government whose Land the deployment project will be taking place upon. Projects that intersect with Tribal Lands should be indicated in the Deployment Project CSV (submitted in the [Final Proposal Data Submission](#) with a 'Y' in the "Intersect with Tribal Lands" column).

The Resolution of Consent may follow the Tribal Government's standard format; NTIA will not provide a standard template for this requirement. The Eligible Entity should ensure that each certification document has the following:

- The appropriate Authorized Organization Representative signatures;
- Come from each Tribal Government governing authority (i.e., the Tribal Council), and/or other governing body, upon whose Tribal Lands the infrastructure will be deployed;
  - Applies to tribes specified in the Federally Recognized Indian Tribal List Act of 1994.
- Be dated after the approval of the Eligible Entity's Initial Proposal;
- The relevant context on the planned (f)(1) broadband deployment including:
  - The entities that will deploy and operate the network;
  - The broadband technologies that will be deployed on Tribal Lands;
  - The timeframe of the agreement; and

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The burden for determining fitness for use lies entirely with the user. The user should refer to the accompanying metadata notes for a description of the data and data development procedures.

- A description of the land proposed for use as part of the proposed project;
  - Identify whether the land is owned, held in Trust, land held in fee simple by the Tribe, or land under a long-term lease by the Tribe;
  - If owned, identify the landowner; and
  - Provide a commitment in writing from the landowner authorizing the applicant's use of that land for the propose project;
- Appears complete; and
- The name of the Resolution of Consent PDF is included in the deployment Project Data.

# PROHIBITION ON EXCLUDING PROVIDER TYPES (REQUIREMENT 16)

**Relevant Requirement from the Infrastructure Act, 47 U.S.C § 1702(h)(1)(A)(iii):**

(A) In general

An eligible entity, in awarding subgrants for the deployment of a broadband network using grant funds received under this section, as authorized under subsection (f)(1)–

(iii) may not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for such grant funds . . . .

**Relevant Instructions from BEAD Restructuring Policy Notice, Section 2.5, Page 6:**

Eligible Entities must still adhere to the statutory requirement regarding the non-exclusion of various entities from eligibility for BEAD subgrants.

The purpose of this section is for the Eligible Entity to certify that it conducted an open subgrantee selection process that did not exclude any of the provider types listed in the Infrastructure Act.

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

The Eligible Entity must provide a certification 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.

# WAIVERS

**Relevant Instructions from BEAD NOFO Section IX.E, Page 95:**

It is the general intent of NTIA not to waive any of the provisions set forth in this NOFO. However, at the discretion of the Assistant Secretary, NTIA, upon its own initiative or when requested, may waive the provisions in this NOFO. Waivers may only be granted for requirements that are discretionary and not mandated by statute or other applicable law. Any request for a waiver must set forth the circumstances for the request.

**Relevant Instructions from BEAD Restructuring Policy Notice Section 2, Page 4:**

Eligible Entities shall eliminate the following non-statutory requirements from BEAD application scoring, subgrantee agreements, and subgrantee reporting requirements. Eligible Entities are hereby prohibited from imposing any of the obligations removed by this Policy Notice on subgrantees as part of the BEAD Program. Where state law conflicts with the requirements of this Policy Notice, Eligible Entities may seek a waiver of that requirement from the Assistant Secretary

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

An Eligible Entity must describe any waiver(s) that are in the process of review or have been approved by the NTIA as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal. Include details on the requirement(s) addressed by the waiver(s) and date(s) of submission.

If no waiver requests have been or plan to be initiated, the Eligible Entity should note ‘Not Applicable’ in this text box.

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

If an Eligible Entity indicates that any waiver(s) have been addressed prior to the Final Proposal in Intake Question 18.1—the Eligible Entity has already submitted required waivers or has already been approved by NTIA—the Eligible Entity does **not** need to attach a waiver as part of its Final Proposal submission.

If an Eligible Entity indicates that waiver(s) will be submitted with the Final Proposal in Intake Question 18.1, the Eligible Entity must attach waiver(s) as part of its Final Proposal submission.

If the Eligible Entity indicates that a waiver is ‘Not Applicable’ in Intake Question 18.1, the Eligible Entity does **not** need to attach a waiver as part of its Final Proposal submission.

The Eligible Entity should coordinate with its Federal Program Officer to submit a waiver request.

# APPENDIX

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## CRITICAL DATA ELEMENTS

Below is a summary of the data fields that are critical for identifying and tracking BEAD projects and subgrantees.

### PROJECT ID

The Project Identifier is the link between CSV files and is essential to post-award reporting; therefore, it is crucial to name projects consistently. The naming convention is as follows:

#### *Agency-Program-State-Project-Subproject*

The “agency” uses the four-character OPM codes.<sup>10</sup> NTIA has been assigned code **CM61**.

The “program” identifier is chosen by each agency; this program uses **BEAD**. The “state” refers to the two-letter USPS abbreviation of the Eligible Entity state or territory.

The “project” and “sub-project” components are chosen by each Eligible Entity. Each project may consist of multiple sub-projects. The use of sub-projects is optional. The full project identifier should be used for all inter-agency efforts, e.g., permitting, Final Proposal reporting, and post-award reporting.

All elements may consist of upper- and lower-case letters, digits, and periods. The case is not significant, i.e., Bead and BEAD refer to the same program. The project and sub-project components should contain no more than 10 characters each.

For example, a BEAD project in Hawaii might use the project identifier: CM61-BEAD-HI-1234X-7, while a project funded by the state of Louisiana may use CM61-BEAD-LA-5678-9.

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<sup>10</sup> [Open Government: Data - OPM.gov](https://open.gov/data-opm)



## UNIQUE ENTITY IDENTIFIER

Unique Entity Identifier (UEI) is a 12-digit number replacing the 9-digit DUNS number. The UEI is used by federal agencies to uniquely identify organizations receiving federal grant funding. Please provide the UEI and UEI Name (i.e., the legal name a subgrantee has registered in SAM.gov) where indicated.

## FRN

The FRN is a 10-digit FCC Registration Number issued by the Commission Registration System (CORES). It is assigned to a business or individual that is registering with the FCC. Each unique FRN is used to identify the unique registrant's interactions with the FCC.

It is expected that all broadband providers possess an FRN. Note: the FRN is different from the six-digit Provider ID.

## LOCATION ID

The FCC's Broadband Serviceable Location Fabric (Fabric) is a dataset of all locations in the United States and its Territories where fixed broadband internet access service is or could be installed. The Fabric provides a 10-digit unique identifier (Location ID) for each Broadband Serviceable Location (BSL).

For BEAD, the list of Location IDs will be the eligible BSLs approved by NTIA after an Eligible Entity completes its Challenge Process.

# LIST OF CSVS

CSV file templates provided by NTIA should be completed as specified below. NTIA will release subsequent submission instructions for any Eligible Entity not funding deployment projects.

Table 2: CSV Files Needed for Submission

Dataset	Submission	Action
Subgrantees	Required - each Eligible Entity conducting BEAD-funded deployment projects	Submit completed CSV file via NGP
Deployment Projects	Required - each Eligible Entity conducting BEAD-funded deployment projects	Submit completed CSV file via NGP
Locations	Required - each Eligible Entity conducting BEAD-funded deployment projects	Submit completed CSV file via NGP
No BEAD Locations	Required - each Eligible Entity indicating a reason for not serving an eligible location through a BEAD project	Submit completed CSV file via NGP
CAIs	Required - each Eligible Entity serving CAIs using BEAD funding	Submit completed CSV file via NGP
	Optional - each Eligible Entity <b>not</b> serving CAIs using BEAD funding	No action

## SUBGRANTEES (FP\_SUBGRANTEES.CSV)

This CSV collects information about the provisionally selected subgrantees for BEAD grants. The Eligible Entity must complete all mandatory fields in the file named “fp\_subgrantees.csv.” All columns are mandatory unless otherwise specified. The header row must use the column names listed. Responses should only include US ASCII characters.

The following must be collected and submitted as part of BEAD Final Proposal:

Table 3: Guidance on Data Formats for Subgrantees (fp\_subgrantees.csv)

Column Name	Data Type	Example	Description
state	string {2}	NJ	<b>State or Territory:</b> two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity



Column Name	Data Type	Example	Description
<b>uei</b>	string {12}	F4N1QNPB9 5M4	<b>Unique Entity Identifier (UEI):</b> SAM.gov assigned legal identifier of subgrantee
<b>uei_name</b>	string	BEAD Telecom LLC	<b>UEI Name:</b> registered name associated with the UEI record in SAM.gov
<b>frn</b>	string {10}	0019570779	<b>FRN:</b> 10-digit FCC Registration Number (FRN) of the subgrantee, with leading zeros

## DEPLOYMENT PROJECTS (*FP\_DEPLOYMENT\_PROJECTS.CSV*)

The Eligible Entity must submit a detailed plan in the form of a CSV file with details on the 47 U.S.C. § 1702 (f)(1) last-mile deployment projects to be implemented by the provisionally selected subgrantees, using the data format provided by NTIA. All columns are mandatory unless otherwise specified. The header row must use the column names listed. Responses should only include US ASCII characters.

For subgrantees that will implement multiple projects, list each project on a separate row, and include a unique project identifier.

The following must be collected and submitted as part of the BEAD Final Proposal:

*Table 4: Guidance on Data Formats for Deployment Projects (fp\_deployment\_projects.csv)*

Column Name	Data Type	Example	Description
<b>state</b>	string {2}	NJ	<b>State or Territory:</b> two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity
<b>project_name</b>	string {255}	Westchester County Internet Initiative	<b>Project Name:</b> Eligibility Entity assigned project name
<b>project_id</b>	string	CM61-BEAD-HI- 1234X-7	<b>Project ID:</b> Eligible Entity assigned unique identifier See Below is a summary of the data fields that are critical for identifying and

Column Name	Data Type	Example	Description								
			tracking BEAD projects and subgrantees. Project section for naming convention.								
uei	string {12}	F4N1QNPB95M4	<b>Unique Entity Identifier (UEI):</b> SAM.gov assigned legal identifier of subgrantee								
project_description	string {1000}	Deployment project for Westchester County to install fiber optic cables to rural areas	<b>Project Description:</b> brief description of the project (max 1,000 characters) Do not use commas or special characters								
project_type	string {1} {L, C, M, W}	W	<b>Project Type:</b> select a project category that best describes deployment activity: <table><tr><td>L</td><td>last-mile broadband deployment</td></tr><tr><td>C</td><td>CAI deployment project</td></tr><tr><td>M</td><td>middle-mile project</td></tr><tr><td>W</td><td>MDU Wi-Fi project</td></tr></table>	L	last-mile broadband deployment	C	CAI deployment project	M	middle-mile project	W	MDU Wi-Fi project
L	last-mile broadband deployment										
C	CAI deployment project										
M	middle-mile project										
W	MDU Wi-Fi project										
priority_broadband_project	string {1} (Y,N)	Y	Priority Broadband Project: indicate whether the project is a Priority Broadband Project (Y) or not (N) based on the Eligible Entity’s application of the statutory definition of Priority Broadband Project.								
estimated_miles_aerial_fiber	integer	12500	<b>Estimated Miles of Aerial Fiber Deployed:</b> anticipated number of miles of aerial fiber to provide service to the locations within the project								
estimated_miles_buried_fiber	integer	12500	<b>Estimated Miles of Buried Fiber Deployed:</b> anticipated number of miles of buried fiber to provide service to the locations within the project								

Column Name	Data Type	Example	Description
<b>estimated_jobs</b>	integer	24	<b>Estimated Number of Jobs:</b> the estimated number of employment opportunities (full-time equivalent) created by the project
<b>estimated_subaward_date</b>	string {10} YYYY-MM-DD	2024-12-02	<b>Estimated Subaward Date:</b> anticipated date of project execution (i.e., the date the subgrantee agreement is signed and active)
<b>estimated_performance_start</b>	string {10} YYYY-MM-DD	2024-12-28	<b>Estimated Period of Performance Start Date:</b> anticipated date when project will commence its period of performance
<b>estimated_performance_end</b>	string {10} YYYY-MM-DD	2026-12-28	<b>Estimated Period of Performance End Date:</b> anticipated date when the project will close its period of performance This must be after the project start date and before March 2, 2032
<b>intersect_tribal</b>	string {1} {Y, N}	Y	<b>Tribal Intersection:</b> indicate whether any BSLs or CAIs funded by the project will intersect Tribal territory (Y) or will <u>not</u> intersect Tribal territory (N)  See <a href="#">Requirement 15</a> for the NTIA Tribal Map Package for reference on Tribal areas that NTIA recognizes for the BEAD Program
<b>tribal_consent_name</b>	string	Seminole Tribe of Oklahoma; Cherokee	<b>Tribal Name(s):</b> name of the tribe(s) in whose territory the project will conduct activities If there are multiple tribes list all tribes separated by a semi-colon The tribes listed must correspond with the Resolution(s) of Consent submitted in Requirement 15 <i>Leave empty if intersect tribal is 'N' / not applicable</i>
<b>bead_support</b>	float	54321.09	<b>Projected BEAD Funding:</b>

Column Name	Data Type	Example	Description
			<p>anticipated amount of BEAD funds used to complete the project, in USD</p> <p>Omit any match amounts</p> <p>Do NOT use special characters (\$) or commas</p>
<b>fixed_amount_subaward</b>	string {1} {Y, N}	N	<p><b>Fixed Amount Subaward:</b></p> <p>indicate whether the subaward utilizes a fixed amount mechanism (Y) or does <u>not</u> utilize a fixed amount mechanism (N)</p> <p>Note: this option may only be used for [last-mile] deployment projects</p>
<b>subgrantee_match</b>	float	9876.54	<p><b>Subgrantee Match:</b></p> <p>total amount of cash and in-kind matching funds for the project to be provided by the subgrantee itself, in USD</p> <p>Do NOT use special characters (\$) or commas</p>
<b>federal_match</b>	float	543.21	<p><b>Federal Match:</b></p> <p>total amount of cash and in-kind matching funds for the project to be provided by match-eligible federal sources, in USD</p> <p>Do NOT use special characters (\$) or commas</p>
<b>state_match</b>	float	4321.09	<p><b>State Match:</b></p> <p>total amount of cash and in-kind matching funds for the project to be provided by the Eligible Entity, in USD</p> <p>Do NOT use special characters (\$) or commas</p>
<b>other_match</b>	float	87.65	<p><b>Other Match:</b></p> <p>total amount of cash and in-kind matching funds for the project to be provided by other sources such as nonprofits organizations, in USD</p> <p>Do NOT use special characters (\$) or commas</p>
<b>federal_match_source</b>	string {250}	ARPA; HRSA	<p><b>Federal Match Source(s):</b></p> <p>name of federal funding source(s) that is match eligible</p>

Column Name	Data Type	Example	Description
			If multiple, enumerate sources, sorted by funding amount, and separated by a semi-colon, with the highest amount first  <i>Leave empty if none</i>
<b>notes</b>	string {250}	No bid	<b>Notes:</b> optional notes about the project For projects that have not been tentatively awarded, state the cause

## LOCATIONS (*FP\_LOCATIONS.CSV*)

The Eligible Entity must submit a detailed plan in the form of a CSV file with data on all 47 U.S.C. § 1702 (f)(1) last-mile deployment locations to be funded by a BEAD project, using the data format provided by NTIA. The list must be consistent with the Eligible Entity’s final classifications of each location within its jurisdiction, as documented in the Eligible Entity’s final list of eligible locations (either the approved Challenge Process list or the updated approved Challenge Process list). The Eligible Entity must complete all mandatory fields in the file named “*fp\_locations.csv*.” The header row must use the column names listed. Responses should only include US ASCII characters. The following must be collected and submitted as part of the BEAD Final Proposal:

Table 5: Guidance on Data Formats for Locations (*fp\_locations.csv*)

Column Name	Data Type	Example	Description
<b>location_id</b>	string {13}	1081756084	<b>Location ID:</b> unique identifier for the location, as used in the Broadband Serviceable Location Fabric
<b>project_id</b>	string	CM61-BEAD-HI-1234X-7	<b>Project ID:</b> Eligible Entity assigned unique identifier defined in the Deployment Project CSV for the project that the location is covered by
<b>classification</b>	enumerated {0, 1, 2}	0	<b>Location Classification:</b> indicate the category classifying the location as unserved (0), underserved (1) or served (2) from the final list of eligible locations

Column Name	Data Type	Example	Description																
technology	integer {2}	50	<b>Technology Code:</b> indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes: <table><tr><td>0</td><td>Other technology</td></tr><tr><td>10</td><td>Copper Wire</td></tr><tr><td>40</td><td>Coaxial Cable / HFC</td></tr><tr><td>50</td><td>Optical Carrier / Fiber to the Premises</td></tr><tr><td>61</td><td>Non-Geostationary Satellite</td></tr><tr><td>70</td><td>Unlicensed Terrestrial Fixed Wireless</td></tr><tr><td>71</td><td>Licensed Terrestrial Fixed Wireless</td></tr><tr><td>72</td><td>Licensed by-Rule Terrestrial Fixed Wireless</td></tr></table>	0	Other technology	10	Copper Wire	40	Coaxial Cable / HFC	50	Optical Carrier / Fiber to the Premises	61	Non-Geostationary Satellite	70	Unlicensed Terrestrial Fixed Wireless	71	Licensed Terrestrial Fixed Wireless	72	Licensed by-Rule Terrestrial Fixed Wireless
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71	Licensed Terrestrial Fixed Wireless																		
72	Licensed by-Rule Terrestrial Fixed Wireless																		
upload_speed_anticipated	integer	1000	<b>Upload Speed Anticipated:</b> planned maximum upload speed in Mbps																
download_speed_anticipated	integer	1000	<b>Download Speed Anticipated:</b> planned maximum download speed in Mbps																
low_latency	enumerated {0, 1}	1	<b>Low Latency:</b> indicate whether the committed service meets the definition of low latency (1) or does <u>not</u> meet the definition of low latency (0) <i>Note: Low latency is defined as having a round-trip latency of less than or equal to 100 ms based on the 95th percentile of measurements</i>																

## NO BEAD LOCATIONS (FP\_NO\_BEAD\_LOCATIONS.CSV)

If the Eligible Entity designates **any** eligible location as a not being served by a BEAD project, it must submit a No BEAD Locations CSV file with data on all locations not serviced through a BEAD project, using the data format provided by NTIA. The Eligible Entity must complete all mandatory fields in the file named

“fp\_no\_BEAD\_locations.csv.” The header row must use the field names listed. Responses should only include US ASCII characters; rows must not include line breaks (ASCII CR or LF). This file is **only required** if there are eligible locations the Eligible Entity **will not serve through a BEAD project**.

The following must be collected and submitted as part of the BEAD Final Proposal:

Table 6: Guidance on Data Formats for No BEAD Locations (fp\_no\_BEAD\_locations.csv)

Column Name	Data Type	Example	Description														
location_id	string {13}	1081756084	<b>Location ID:</b> unique identifier for the location, as used in the Broadband Serviceable Location Fabric														
classification	Enumerated {0, 1}	0	<b>Location Classification:</b> indicate the category classifying the location as unserved (0) or underserved (1) from the final list of eligible locations														
reason	string {1}	5	<b>Reason:</b> indicate the reason for no BEAD funded service: <table><tr><td>1</td><td>location should not have broadband service</td></tr><tr><td>2</td><td>location does not need mass-market broadband service</td></tr><tr><td>3</td><td>location has been removed from the latest Fabric by the FCC (or now listed as BSL = FALSE)</td></tr><tr><td>4</td><td>location is already served by an enforceable commitment</td></tr><tr><td>5</td><td>location is already served by non-subsidized service (privately funded network). Cannot be used for low-earth orbit satellite service</td></tr><tr><td>6</td><td>other</td></tr><tr><td>7</td><td>financially incapable</td></tr></table>	1	location should not have broadband service	2	location does not need mass-market broadband service	3	location has been removed from the latest Fabric by the FCC (or now listed as BSL = FALSE)	4	location is already served by an enforceable commitment	5	location is already served by non-subsidized service (privately funded network). Cannot be used for low-earth orbit satellite service	6	other	7	financially incapable
1	location should not have broadband service																
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5	location is already served by non-subsidized service (privately funded network). Cannot be used for low-earth orbit satellite service																
6	other																
7	financially incapable																
non_bsl_code	string {1}	R	<b>Non BSL Code:</b> indicate the non BSL reason for reason 1: <table><tr><td>D</td><td>location has been demolished and is not expected to be rebuilt</td></tr><tr><td>B</td><td>residential location is not habitable</td></tr><tr><td>U</td><td>location is a support structure (e.g., a garage, parking structure, barn,</td></tr></table>	D	location has been demolished and is not expected to be rebuilt	B	residential location is not habitable	U	location is a support structure (e.g., a garage, parking structure, barn,								
D	location has been demolished and is not expected to be rebuilt																
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U	location is a support structure (e.g., a garage, parking structure, barn,																

			<table><tr><td></td><td>silos, storage shed) to a nearby building</td></tr><tr><td>M</td><td>location is intended to be mobile (e.g., it is an RV or boat)</td></tr><tr><td>R</td><td>location is not a building but a land formation, such as a large rock or collection of hay bales</td></tr><tr><td>Z</td><td>location is not serviceable for another reason</td></tr></table> <p>Leave empty for all other reason codes</p>		silos, storage shed) to a nearby building	M	location is intended to be mobile (e.g., it is an RV or boat)	R	location is not a building but a land formation, such as a large rock or collection of hay bales	Z	location is not serviceable for another reason	
	silos, storage shed) to a nearby building											
M	location is intended to be mobile (e.g., it is an RV or boat)											
R	location is not a building but a land formation, such as a large rock or collection of hay bales											
Z	location is not serviceable for another reason											
location_type	string {1}	E	<p><b>Location Type:</b> indicate the type of building or location that does not subscribe to mass-market broadband for reason 2:</p> <table><tr><td>E</td><td>enterprise</td></tr><tr><td>C</td><td>CAI</td></tr><tr><td>P</td><td>government property</td></tr></table> <p>Leave empty for all other reason codes</p>	E	enterprise	C	CAI	P	government property			
E	enterprise											
C	CAI											
P	government property											
financial_type	string {1}		<p><b>Financial Type:</b> Indicate the subcode for reason code 7:</p> <table><tr><td>F</td><td>financially incapable</td></tr><tr><td>X</td><td>excessive cost</td></tr></table> <p>Leave empty for all other reason codes</p>	F	financially incapable	X	excessive cost					
F	financially incapable											
X	excessive cost											
evidence_type	string {1}	L	<p><b>Type of Evidence:</b> indicate type of evidence collected for each applicable reason code:</p> <table><tr><th>Code</th><th>Nature of Evidence</th><th>Applicable Reason Code(s)</th></tr><tr><td>L</td><td>attestation by unit of local or Tribal government</td><td>1</td></tr><tr><td>G</td><td>attestation by government</td><td>1, 2</td></tr></table>	Code	Nature of Evidence	Applicable Reason Code(s)	L	attestation by unit of local or Tribal government	1	G	attestation by government	1, 2
Code	Nature of Evidence	Applicable Reason Code(s)										
L	attestation by unit of local or Tribal government	1										
G	attestation by government	1, 2										



			<table border="1"> <tr> <td></td><td>entity owning location</td><td></td></tr> <tr> <td>F</td><td>Attestation by federal government agency</td><td>2</td></tr> <tr> <td>P</td><td>photographic evidence</td><td>1, 2, 5</td></tr> <tr> <td>S</td><td>evidence of subscription (service record)</td><td>5, 2</td></tr> <tr> <td>N</td><td>network diagram</td><td>5</td></tr> <tr> <td>O</td><td>attestation by private property owner</td><td>1, 2</td></tr> <tr> <td>T</td><td>network speed test</td><td>5</td></tr> <tr> <td>X</td><td>other evidence</td><td>1, 2, 4, 5</td></tr> </table> <p>If there are multiple types of evidence, separate by space and list alphabetically.</p> <p><i>Leave empty for all other reason codes</i></p>		entity owning location		F	Attestation by federal government agency	2	P	photographic evidence	1, 2, 5	S	evidence of subscription (service record)	5, 2	N	network diagram	5	O	attestation by private property owner	1, 2	T	network speed test	5	X	other evidence	1, 2, 4, 5
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X	other evidence	1, 2, 4, 5																									
<b>provider_id</b>	string {10}	0019570779	<b>Provider ID:</b> a unique 6-digit code generated by the FCC that identifies each service provider  Only applicable for reason codes 4 and 5. <i>Leave empty for all other reason codes</i>																								
<b>technology</b>	integer {2}	50	<b>Technology:</b> indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes, for reason codes 4 and 5 (as applicable): <table border="1"> <tr> <td>0</td><td>Other technology</td></tr> <tr> <td>10</td><td>Copper Wire</td></tr> <tr> <td>40</td><td>Coaxial Cable / HFC</td></tr> <tr> <td>50</td><td>Optical Carrier / Fiber to the Premises</td></tr> </table>	0	Other technology	10	Copper Wire	40	Coaxial Cable / HFC	50	Optical Carrier / Fiber to the Premises																
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			<table border="1"> <tr> <td></td> <td></td> </tr> <tr> <td>61</td> <td>Non-Geostationary Satellite <i>may only be used for reason code 4</i></td> </tr> <tr> <td>70</td> <td>Unlicensed Terrestrial Fixed Wireless</td> </tr> <tr> <td>71</td> <td>Licensed Terrestrial Fixed Wireless</td> </tr> <tr> <td>72</td> <td>Licensed by-Rule Terrestrial Fixed Wireless</td> </tr> </table> <p>If multiple, select only one technology. Leave empty for all other reason codes</p>			61	Non-Geostationary Satellite <i>may only be used for reason code 4</i>	70	Unlicensed Terrestrial Fixed Wireless	71	Licensed Terrestrial Fixed Wireless	72	Licensed by-Rule Terrestrial Fixed Wireless														
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program	string	RDOF	<p><b>Enforceable Commitment Program:</b> denote the enforceable commitment program name for reason 4.</p> <p>If it's a <b>federal program</b>, enter the program acronym:</p> <table border="1"> <thead> <tr> <th>Program</th> <th>Federal Agency</th> <th>Program Name</th> </tr> </thead> <tbody> <tr> <td>BIP</td> <td>NTIA</td> <td>Broadband Infrastructure Program</td> </tr> <tr> <td>CAFII</td> <td>FCC</td> <td>Connect America Fund Phase II</td> </tr> <tr> <td>CCGP</td> <td>USDA</td> <td>Community Connect Grant Program</td> </tr> <tr> <td>CPF</td> <td>US Dept. of Treasury</td> <td>Capital Projects Fund</td> </tr> <tr> <td>EACAM</td> <td>FCC</td> <td>Enhanced Alternative Connect America Cost Model</td> </tr> <tr> <td>RDOF</td> <td>FCC</td> <td>Rural Digital Opportunity Fund</td> </tr> <tr> <td>RECONNECT</td> <td>Rural Utilities Service</td> <td>Rural EConnectivity Program (ReConnect)</td> </tr> </tbody> </table>	Program	Federal Agency	Program Name	BIP	NTIA	Broadband Infrastructure Program	CAFII	FCC	Connect America Fund Phase II	CCGP	USDA	Community Connect Grant Program	CPF	US Dept. of Treasury	Capital Projects Fund	EACAM	FCC	Enhanced Alternative Connect America Cost Model	RDOF	FCC	Rural Digital Opportunity Fund	RECONNECT	Rural Utilities Service	Rural EConnectivity Program (ReConnect)
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challenge_id	integer	7899	<b>FCC Location Challenge ID:</b> the challenge identifier for the location challenge submitted to the FCC. If the Eligible Entity has submitted a bulk challenge to the FCC, it may include the Reference ID here  Only applicable for reason codes 1 and 2 . <i>Leave empty for all other reason codes</i>									
notes	string	The landowner refused access to their land.	<b>Notes:</b> if needed, additional notes explaining why the location should not receive service through a BEAD project. Do not include linebreaks									

## CAIS (FP\_CAI.CSV)

The Eligible Entity must submit a detailed plan in the form of a CSV file with data on **all CAI locations to be funded by BEAD**, using the data format provided by NTIA. This list

of funded CAIs must be consistent with the Eligible Entity’s final classifications of eligible CAI within its jurisdiction. Only funded (where projects are planned) CAIs are required in this csv. The Eligible Entity must complete all mandatory fields in the file named “*fp\_cai.csv*.”

This CSV submission is only mandatory if the Eligible Entity is planning on serving CAIs. The following must be collected and submitted as part of BEAD Final Proposal:

*Table 7: Guidance on Data Formats for CAIs (fp\_cai.csv)*

Column Name	Data Type	Example	Description														
type	string {1}	S	<b>Type:</b> indicate the CAI location type: <table><tr><td>S</td><td>K-12 school, junior college, community college, university, or other educational institution</td></tr><tr><td>L</td><td>library</td></tr><tr><td>G</td><td>local, state, federal or Tribal government building</td></tr><tr><td>H</td><td>health clinic, health center, hospital, or other medical provider</td></tr><tr><td>F</td><td>public safety entity such as a fire house, emergency medical service station, police station, or public safety answering point (PSAP)</td></tr><tr><td>P</td><td>public housing organization</td></tr><tr><td>C</td><td>for BEAD purposes, a “community support organization” is an organization located in a government-owned facility that provides publicly accessible Internet service and currently offers digital skills training</td></tr></table>	S	K-12 school, junior college, community college, university, or other educational institution	L	library	G	local, state, federal or Tribal government building	H	health clinic, health center, hospital, or other medical provider	F	public safety entity such as a fire house, emergency medical service station, police station, or public safety answering point (PSAP)	P	public housing organization	C	for BEAD purposes, a “community support organization” is an organization located in a government-owned facility that provides publicly accessible Internet service and currently offers digital skills training
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entity_name	string	YMCA of New Castle County DE	<b>Entity Name:</b> official name of the CAI														
location_id	string {13}	1081756084	<b>Location ID:</b> unique identifier of the CAI from the Broadband Serviceable Location (BSL) Fabric if the location has a corresponding Location ID														

			<i>The Location ID may not be available for all locations</i>
<b>project_id</b>	string	CM61-BEAD-HI-1234X-7	<b>Project ID:</b> Eligible Entity assigned unique identifier for the project that the CAI is covered within See Below is a summary of the data fields that are critical for identifying and tracking BEAD projects and subgrantees. Project section for naming convention
<b>address_primary</b>	string	10 Main St	<b>Street Address:</b> street number, street name, and any applicable prefix or suffix of the first address line (primary address) of the CAI Denote the physical address of the CAI, not the administrative location
<b>city</b>	string	Sandisfield	<b>City:</b> full name of the city, town, municipality, or census designated place associated with address
<b>state</b>	string {2}	NJ	<b>State or Territory:</b> two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity
<b>zip_code</b>	string	01255	<b>Zip Code:</b> five-digit USPS ZIP code associated with address, including any leading zeros
<b>latitude</b>	float {-14.6 to 71.4}	42.06490	<b>Latitude:</b> unprojected (WGS-84) geographic coordinate latitude in decimal degrees for the CAI, with a minimal precision of 4 decimal digits
<b>longitude</b>	float {179.2 to 179.8}	-73.13086	<b>Longitude:</b> unprojected (WGS-84) geographic coordinate longitude in decimal degrees for the CAI, with a minimal precision of 4 decimal digits

technology	enumerated {2}	50	<b>Technology Code:</b> code for the technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes: <table><tr><td>0</td><td>Other technology</td></tr><tr><td>10</td><td>Copper Wire</td></tr><tr><td>40</td><td>Coaxial Cable / HFC</td></tr><tr><td>50</td><td>Optical Carrier / Fiber to the Premises</td></tr><tr><td>61</td><td>Non-Geostationary Satellite</td></tr><tr><td>70</td><td>Unlicensed Terrestrial Fixed Wireless</td></tr><tr><td>71</td><td>Licensed Terrestrial Fixed Wireless</td></tr><tr><td>72</td><td>Licensed by-Rule Terrestrial Fixed Wireless</td></tr></table>	0	Other technology	10	Copper Wire	40	Coaxial Cable / HFC	50	Optical Carrier / Fiber to the Premises	61	Non-Geostationary Satellite	70	Unlicensed Terrestrial Fixed Wireless	71	Licensed Terrestrial Fixed Wireless	72	Licensed by-Rule Terrestrial Fixed Wireless
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upload_speed_anticipated	integer	1000	<b>Upload Speed Anticipated:</b> planned maximum upload speed in Mbps																
download_speed_anticipated	integer	1000	<b>Download Speed Anticipated:</b> planned maximum download speed in Mbps																

# CHANGE LOG

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Version Number	Page Number	Date of Change	Location of Change	Description of Change
2.1	14	07/16/2025	Public Posting	Updated that the Eligible Entity may, but is not required to, submit its Final Proposal in NGP when it published the draft for public comment
2.1	21; 90	07/16/2025	Intake Question 0.6; CAI CSV file	Included the definition of community support organization, per BEAD FAQs
2.1	62 - 64	07/16/2025	Intake Question 12.1	Included guidance on how the Eligible Entity should determine which project proposals are Priority Broadband Projects, per BEAD FAQs