

# A Connected Florida: Access, Opportunity, Workforce, Prosperity, Resiliency

*Florida's BEAD Initial Proposal,  
Volume 2*

State of Florida



Florida Office of Broadband  
Florida Department of Commerce



## Table of Contents

2.1	Objectives (Requirement 1) .....	3
2.2	Local, Tribal, and Regional Broadband Planning Process (Requirement 2).....	7
2.3	Local Coordination (Requirement 4).....	9
2.4	Deployment Subgrantee Selection (Requirement 8) .....	17
2.5	Non-Deployment Subgrantee Selection (Requirement 9).....	48
2.6	Eligible Entity Implementation Activities (Requirement 10).....	54
2.7	Labor Standards and Protection (Requirement 11).....	55
2.8	Workforce Readiness (Requirement 12).....	58
2.9	Minority and Women’s Business Enterprises / Labor Surplus Area Firms Recruited (Requirement 13).....	65
2.10	Cost and Barrier Reduction (Requirement 14).....	68
2.11	Climate Assessment (Requirement 15).....	70
2.12	Low-Cost Broadband Service Options (Requirement 16) .....	74
2.13	Middle Class Affordability Plans (Requirement 20).....	76
2.14	Use of 20 Percent of Funding (Requirement 17) .....	77
2.15	Eligible Entity Regulatory Approach (Requirement 18) .....	80
2.16	Certification of Compliance with BEAD Requirements (Requirement 19).....	81
2.17	Volume II Public Comment .....	85
2.18	Appendix I .....	90

## Table of Figures

Figure 1: Florida’s BEAD Strategic Framework .....	4
Figure 2: In-Person Community Engagement Public Workshop Locations .....	12
Figure 3: Sample In-Person Broadband Public Workshop Agenda.....	13
Figure 4: Sample Virtual Broadband Workshop Agenda .....	13
Figure 5: Deployment Subgrantee Selection Process .....	17
Figure 6: FloridaCommerce Office of Broadband Program Highlights .....	77

## 2.1 Objectives (Requirement 1)

---

2.1.1 Text Box: Outline the long-term objectives for deploying broadband; closing the digital divide; addressing access, affordability, equity, and adoption issues; and enhancing economic growth and job creation. Eligible Entities may directly copy objectives included in their Five-Year Action Plans.

Reliable broadband Internet access is necessary for job seekers and job creators in a modern community – and in a connected economy. The Internet plays a central role in family and community connections, K-12 education, workforce education, job training, upskilling, job seeking, business development, industry and market sector growth, access to health care services, emergency preparedness and response, supporting the needs of Florida’s federally recognized tribes, and – collectively – community resilience.

Along with access to digital devices and the required skills to use those devices, broadband is critical to an individual’s economic mobility and overall quality of life. Individuals who lack broadband access cannot realize these economic and social benefits, and the expansion of broadband represents a tremendous opportunity. This is particularly true for rural, unserved, and underserved communities across Florida, where expanded access will encourage increased business growth, greater educational and employment opportunities, and better access to public and private programs and services.

Bottom line – broadband access has become an input that impacts all Floridians’ outcomes.

To that end, Florida has made significant progress in its broadband expansion efforts, reaching 94% coverage statewide according to December 2022 data from the Federal Communications Commission (FCC) Broadband Data Collection (BDC) system. Part of this success can be attributed to the state’s wide network of carriers and Internet service providers (ISPs), as well as state and federally funded broadband programs that have helped bring much of the state online. Additionally, in 2020 the creation of the Office of Broadband (“the Office”), housed within the Florida Department of Commerce (FloridaCommerce), enabled the state to allocate more funding and resources for broadband expansion. While these milestones represent Florida’s success, there is still work to be done in the remaining six percent of the state. Approximately 406,000 locations in Florida still lack access to high-speed, reliable Internet service.<sup>1</sup> While some of the awards from the Office initiated planned and in progress deployments, that service coverage may not yet be reflected in the FCC’s data. For residents in these areas, the repercussions of the digital divide extend far beyond the inability to simply browse the Internet.

The Broadband Equity, Access, and Deployment (BEAD) Program will address some of these challenges and build on the state’s ongoing broadband expansion and digital literacy efforts. To help guide the development and implementation of Florida’s BEAD Program, the Office created a Strategic Framework, which includes three goals and nine objectives in line with the following vision: “To foster a Connected Economy that supports workforce and community development, education opportunities, resiliency, and telemedicine by increasing broadband availability, accessibility, and adoption.”

To achieve its goals and objectives, the Office will partner with multiple state agencies, including the Department of Education, Department of Transportation, Department of Management Services, Agency for Health Care Administration, Department of Health, Department of Children and Families, Agency for Persons with Disabilities, Department of State, Department of Environmental Protection, and others. In addition to public entities, the Office will also engage with external stakeholders including Internet service providers (ISPs), community anchor institutions (CAIs), and Florida’s federally recognized tribes. The following overarching themes are emphasized in Florida’s Digital Adoption and Use Plan to prioritize efforts and emphasize the cohesion of both plans.

---

<sup>1</sup> Based on analysis of December 2022 data from the Federal Communications Commission (FCC) Broadband Data Collection (BDC) system.

# Florida BEAD Vision, Goals, and Objectives

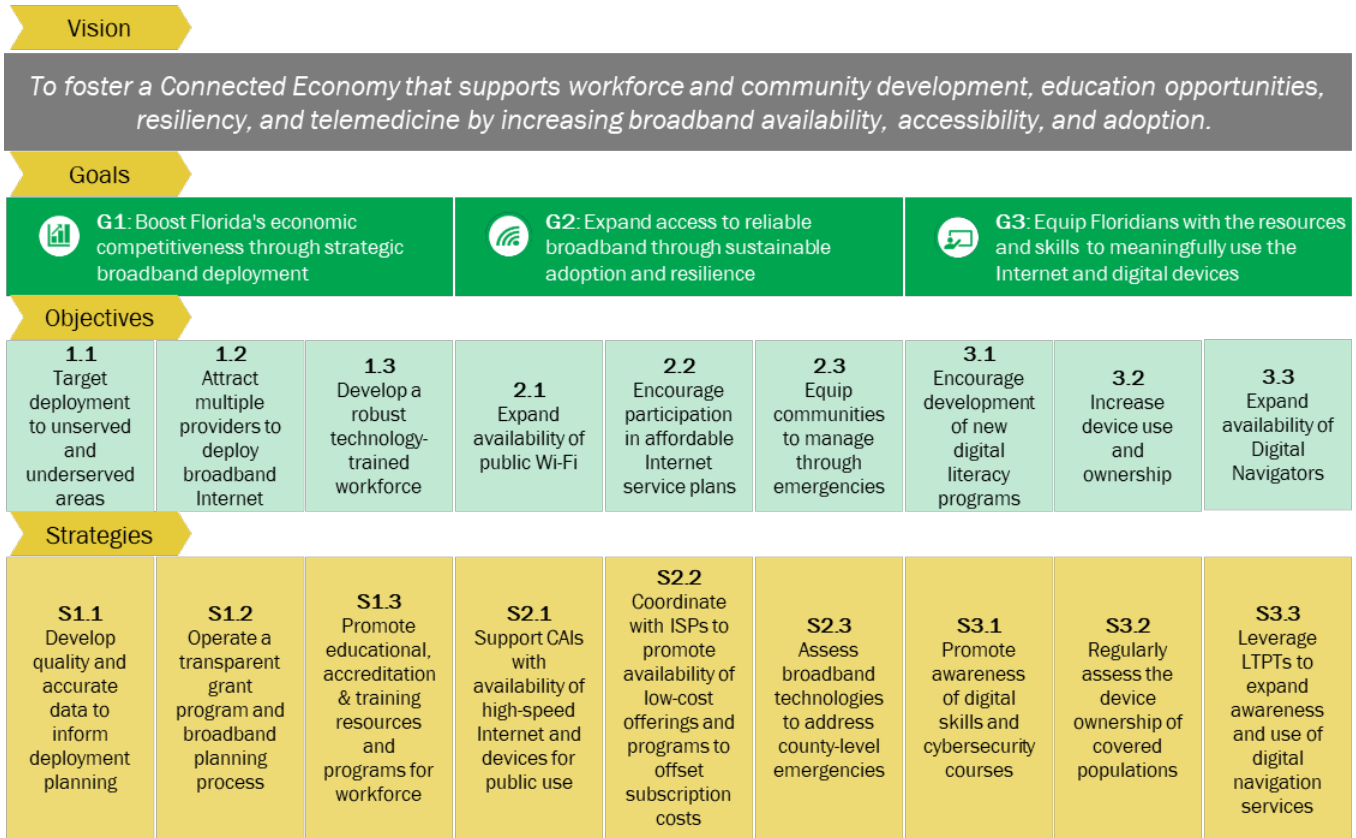
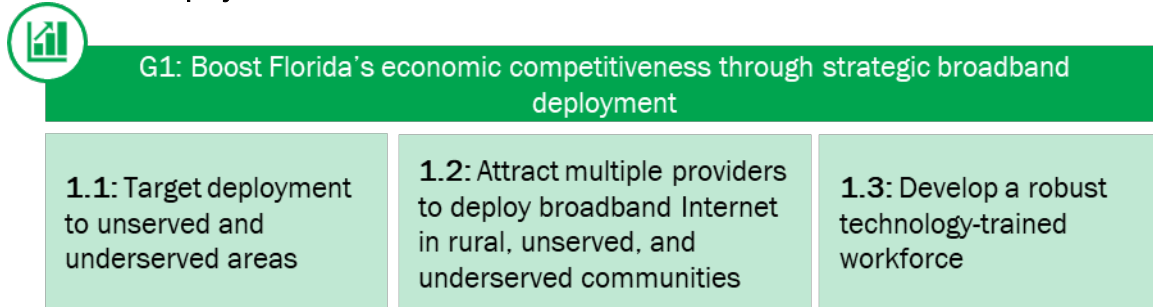


Figure 1: Florida's BEAD Strategic Framework

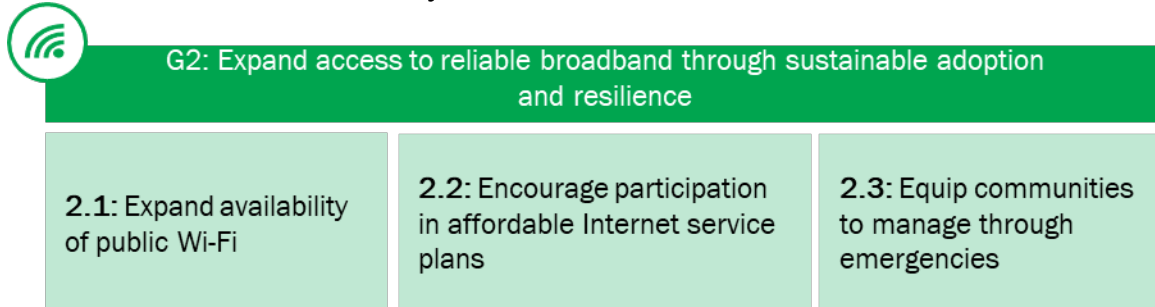
## Broadband Deployment and Economic Growth



Florida's goals and objectives related to broadband deployment and economic growth are inherently intertwined. Key stakeholders and communities from across the state identified low provider presence or unreliable existing service as factors hindering economic development by deterring larger

businesses from establishing offices in their regions. Equipping each community with quality, reliable Internet - especially in Florida’s rural areas - will encourage business retention and attraction, tourism, and access to education and workforce opportunities in alignment with the state’s economic development goals. Additionally, as the state facilitates expansion of broadband Internet to unserved and underserved communities, it will focus on opportunities to develop and train a skilled workforce. These efforts will build and expand upon the work that Florida has already begun to strengthen its talent pipeline and close the supply and demand gaps in the workforce.

**Broadband Access and Affordability**



Over the past three years, the Office of Broadband has conducted extensive outreach to key stakeholders and community members. A major theme from these interactions is that broadband access means different things to different communities, depending on their needs. As such, the state of Florida aims to increase access through the following activities:

- Expanding the availability of access both inside and outside the home, with a special focus on covered populations. Covered populations, as defined within Florida’s Digital Adoption and Use Plan, include:
  1. Individuals living in households that have incomes at or below 150% of the Federal Poverty Level;
  2. Incarcerated individuals;
  3. Individuals with disabilities;
  4. Individuals who are members of a racial or ethnic minority group;
  5. Aging individuals;
  6. Veterans;
  7. Individuals with a language barrier;
  8. Individuals who primarily reside in a rural area.
- Spreading awareness of the benefits of broadband Internet to encourage expanded access and sustainable adoption over time.

Promoting broadband resiliency in the face of natural disasters, public health emergencies, and economic downturns for each and every community.<sup>2</sup>

---

<sup>2</sup> The defined term “sustainable adoption” implies that while public financial support may be important in the short term, the end goal is for providers to be able to obtain “adoption and use levels” that allow services to be offered without government subsidies. (§ 288.9961(2)(e), Fla. Stat.)

## Broadband Adoption and Digital Literacy



### G3: Equip Floridians with the resources and skills to meaningfully use the Internet and digital devices

**3.1:** Encourage development of new digital literacy programs

**3.2:** Increase device use and ownership

**3.3:** Expand availability of Digital Navigators

Publicly available data demonstrates that not all Floridians receive reliable, high-speed, broadband Internet. This point has been highlighted through FloridaCommerce’s engagement with communities and conversations with citizens all around the state, especially with respect to Florida’s rural, low- income, and elderly populations. Discussions with community leaders, parents, and working-age individuals from rural and low-income areas revealed that many struggled to keep up with the demands of school and work due to a lack of reliable or affordable broadband subscriptions and devices. Additionally, it became apparent that much of Florida’s senior population lacked the skills necessary to use the Internet and could not access the telehealth services they so vitally needed.<sup>3</sup>

These adoption challenges expressed by both the public and community leaders are also supported by data:

- Nearly a quarter of the state’s population does not use the Internet – this is the second highest rate of non-adoption among all states.<sup>4</sup>
- Approximately 40% of Florida’s population does not use a digital device – this is the third highest rate of non-adoption among all states.<sup>5</sup>

To tackle these adoption challenges, Florida will place an emphasis on digital literacy by:

- Carrying out activities with community partners to equip more Floridians with the skills to participate meaningfully in a digital world.
- Focusing on the Internet-enabled devices that meet the unique needs of communities.
- Providing one-on-one support from digital navigators<sup>6</sup> for ongoing assistance with Internet access, device acquisition, technical skills, and application support.

<sup>3</sup> Florida Office of Broadband 2021 Workshop Summary. [https://floridajobs.org/docs/default-source/2015-community-development/ocp/obworkshopsummaryfinal5f1c2da4cbbb61cbb02aff01004f56df.pdf?sfvrsn=a0a14cb0\\_10](https://floridajobs.org/docs/default-source/2015-community-development/ocp/obworkshopsummaryfinal5f1c2da4cbbb61cbb02aff01004f56df.pdf?sfvrsn=a0a14cb0_10)

<sup>4</sup> National Telecommunications and Information Administration, Digital Nation Data Explorer, <https://www.ntia.gov/other-publication/2022/digital-nation-data-explorer#sel=internetUser&disp=map>

<sup>5</sup> National Telecommunications and Information Administration, Digital Nation Data Explorer, <https://www.ntia.gov/other-publication/2022/digital-nation-data-explorer#sel=internetUser&disp=map>

<sup>6</sup> The term “digital navigator” is used to describe “trusted guides who assist community members in Internet adoption and the use of computing devices. Digital navigation services include ongoing assistance with affordable Internet access, device acquisition, technical skills, and application support” (National Digital Inclusion Alliance).

## 2.2 Local, Tribal, and Regional Broadband Planning Process (Requirement 2)

---

2.2.1 Text Box: Identify and outline steps that the Eligible Entity will take to support local, Tribal, and regional broadband planning processes or ongoing efforts to deploy broadband or close the digital divide. In the description, include how the Eligible Entity will coordinate its own planning efforts with the broadband planning processes of local and Tribal Governments, and other local, Tribal, and regional entities. Eligible Entities may directly copy descriptions in their Five-Year Action Plans.

Since its inception, the Office has engaged local and regional entities, including Florida's federally recognized tribes, on their planning processes and efforts to deploy broadband and close the digital divide. The Office has engaged these entities through online resources and planning toolkits, in-person and virtual meetings, and information-sharing and data-gathering. Engagement efforts included:

- The [Florida Strategic Plan for Broadband](#), which included guidance on the role of local and regional governments in broadband expansion efforts.
- The [Office of Broadband webpage](#) which serves as a one-stop-shop for news, funding opportunities, and helpful planning toolkits and resources for local, regional, and Tribal stakeholders.
- The FloridaCommerce listserv to communicate more directly with stakeholders on the Office's priorities and activities. All interested parties can join the listserv by simply signing up [here](#).
- [Local Technology Planning Teams \(LTPTs\)](#) which are statutorily created county-level teams (67 in total) devoted to technology and broadband planning for communities. They consist of representatives from diverse backgrounds and industries, including libraries; K-12 education; colleges and universities; local health care providers; private businesses; community organizations; economic development organizations; local governments; tourism; parks and recreation; and agriculture.<sup>7</sup>
- [Broadband Toolkits](#) to assist local governments in identifying access gaps in high-speed Internet service.
- An in-person [Broadband Summit](#) that brought together more than 300 broadband industry stakeholders, local government officials, workforce and economic development professionals, and community organizations to share information and discuss the expansion and adoption of broadband across the state and how these services impact Florida's economy.
- A series of [10 virtual workshops](#), hosted in collaboration with the Florida Regional Councils Association, where participants discussed broadband Internet accessibility. Community leaders within each region of Florida attended along with a cross-section of industry representatives.
- Dozens of one-on-one listening sessions that were held with local and regional leaders to inform the Five-Year Action Plan (future listening sessions will be held as opportunities arise).
- Meetings with leadership from the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida.

FloridaCommerce is committed to ensuring the voices of Florida's federally recognized tribes were included as part of the development of the state's Five-Year Action Plan. Through

---

<sup>7</sup> Fla. Stat. § 288.9961(4)(b)

tribal consultation letters, in-person and virtual meetings, and questionnaires, FloridaCommerce was able to learn the perspectives of the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida on broadband needs in their communities. FloridaCommerce will build off these efforts to continue supporting Florida's federally recognized tribes as they expand broadband deployment and digital adoption.



## 2.3 Local Coordination (Requirement 4)

2.3.1 Text Box: Describe the coordination conducted, summarize the impact such impact has on the content of the Initial Proposal, and detail ongoing coordination efforts. Set forth the plan for how the Eligible Entity will fulfill the coordination associated with its Final Proposal.

While FloridaCommerce can help plan, guide, and facilitate the expansion of broadband and digital adoption, an array of Tribal, private, public, and non-profit stakeholders will ultimately implement the solutions to address their regions' service needs and gaps. Thus, coordinating with these stakeholders was and continues to be a critical component in developing and implementing a successful and comprehensive BEAD Program.

The following sections detail the elements of Florida's stakeholder engagement process and plans for ongoing stakeholder coordination throughout the lifecycle of the BEAD Program:

1. Stakeholder Engagement Principles: Describes how the stakeholder engagement process aligns with National Telecommunications and Information Administration (NTIA) local coordination evaluation criteria.
2. Stakeholder Identification: Describes the process for identifying stakeholders.
3. Engagement Activities: Describes specific engagement mechanisms and activities used in plan development.
4. Scale of Outreach: Describes the magnitude of stakeholder engagement activities.
5. Plans for Ongoing Coordination: Describes plans for ongoing stakeholder engagement.

### ***Stakeholder Engagement Principles***

The Office of Broadband referenced and considered the local coordination evaluation criteria included in the BEAD Notice of Funding Opportunity (NOFO) and guidance when developing its stakeholder engagement process. As displayed in Table 1 below, the Office of Broadband implemented key engagement principles identified by the NTIA throughout the engagement process.

Table 1: Stakeholder Engagement Principles

Stakeholder Engagement Principle	FloridaCommerce Office of Broadband Actions
Provide opportunities for the entire state of Florida to participate in plan development process	<ul style="list-style-type: none"> <li>• Hosted six public in-person workshops across Florida (see Figure 2).</li> <li>• Hosted three public virtual workshops and posted webinar recordings on the Office of Broadband webpage (<a href="#">link</a>).</li> <li>• Provided a contact email address for stakeholders and the public to interact with the Office of Broadband, ask questions and provide feedback.</li> <li>• Hosted the Broadband Summit in Orlando, which drew over 300 participants from across the state.</li> </ul>
Meaningfully engage diverse stakeholder groups	<ul style="list-style-type: none"> <li>• As detailed in Table 2, outreach efforts targeted diverse stakeholder groups (all vulnerable populations as identified</li> </ul>

	<p>within the NOFO) to encourage participation in plan development activities through questionnaires, interviews, and in-person and virtual workshops.</p> <ul style="list-style-type: none"> <li>• The Office of Broadband engaged with stakeholder groups it had not previously engaged.</li> </ul>
Use multiple awareness and participation mechanisms to share information and outreach to stakeholder groups and Floridians	<ul style="list-style-type: none"> <li>• The Office of Broadband deployed several mechanisms to support public awareness of engagement opportunities as detailed in this section.</li> <li>• Public, in-person and virtual workshop information was shared on the Office of Broadband’s webpage during the plan development process in June and July 2023.</li> <li>• Information was also shared through direct communications to FloridaCommerce’s stakeholder listserv.</li> </ul>
Establish, document, and follow clear procedures to ensure transparent plan development process	<ul style="list-style-type: none"> <li>• As further detailed in Sections 4.1.3 and 5.1.3 of Florida’s Digital Adoption and Use and Five-Year Action Plans, respectively, the Office of Broadband: <ul style="list-style-type: none"> <li>○ Shared virtual workshop recordings and presentations on Office of Broadband webpage.</li> <li>○ Continues to maintain an email inbox for stakeholders and Floridians to ask questions or provide feedback about plan development.</li> <li>○ Provided Spanish interpretation services at all in- person workshops.</li> <li>○ Provided American Sign Language (ASL) interpretation services at all in-person and virtual workshops.</li> </ul> </li> <li>• Provided an updated map on Office of Broadband webpage that shows what areas have received funds under current or past grant programs to inform BEAD process.</li> </ul>
Engage and conduct outreach to unserved and underserved communities	<ul style="list-style-type: none"> <li>• Identified and engaged with stakeholders that had not previously engaged with in the plan development process.</li> </ul>

**Stakeholder Identification**

The Office specifically targeted the following types of stakeholder groups and entities to engage in the development process based on NTIA guidance:

- Government entities: State agencies and local governments
- Community anchor institutions: meaning “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.” (See Volume I)

- Local Technology Planning Teams: Statutorily created county-level teams devoted to technology and broadband planning for communities.<sup>8</sup>
- Organizations supporting covered populations: Non-profits, community organizations, etc. that specifically target and serve one or more covered populations, including all vulnerable populations as identified within the NOFO.
- Workforce and economic development organizations: Chambers of Commerce, Local Workforce Development Boards, the Florida Department of Education, and CareerSource Florida.
- Private industry: Internet service providers and industry associations (e.g., Florida Internet and Television, Wireless Internet Association).
- Florida’s Federally Recognized Tribes: The Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida
- All vulnerable populations as identified within the NOFO.

The Office identified these types of specific stakeholder groups and entities through the following methods:

- Previous engagement/contact: Stakeholder groups that previously engaged with the Office through activities such as developing its Strategic Plan or contacted the Office about Florida’s BEAD plan development.
- Desk research: Internet searches and research.
- Existing structures: Local Technology Planning Teams, inter-agency collaborations.
- Recommendations/word of mouth: Referrals from organizations or community members about other organizations or entities to engage in the planning process.

### ***Engagement Activities***

The Office used multi-faceted stakeholder engagement tactics to conduct outreach and solicit feedback. Engagement mechanisms include the following activities that are detailed in this section:

1. Local Technology Planning Teams
2. Office of Broadband Webpage
3. In-Person Community Engagement Public Workshops
4. Virtual Community Engagement Public Workshops
5. Community and Broadband Events
6. Questionnaires
7. Interviews
8. Tribal Engagement
9. ConnectedFlorida map

#### ***1. Local Technology Planning Teams (LTPTs)***

LTPTs serve as the bridge between communities and the Office. As established under section 288.9961(4)(b), Florida Statutes, LTPTs are county-level teams that “work with rural communities to help the communities understand their current broadband availability, locate unserved and

---

<sup>8</sup> Under Section 288.9961(4)(b) of Florida Statutes, the Office of Broadband was mandated to build and facilitate local technology planning teams representing cross-sections of the community, which may include, but are not limited to: Libraries; K-12 education; colleges and universities; local health care providers; private businesses; community organizations; economic development organizations; local governments; tourism; parks and recreation; and agriculture.

underserved businesses and residents, identify assets relevant to broadband deployment, build partnerships with broadband service providers, and identify opportunities to leverage assets and reduce barriers to the deployment of broadband Internet services in the community.” The Office used the LTPT structure to disseminate information about plan development progress, public engagement opportunities to inform the plan, and to solicit local plans.

LTPTs can include representatives from libraries, K-12 education, colleges and universities, local health care providers, private businesses, community organizations, economic development organizations, local governments, tourism, parks and recreation, and agriculture.

### 2. Office of Broadband Webpage

The Office used its webpage ([link](#)) to invite all interested stakeholders and Floridians to participate in six in-person and three virtual workshops. The webpage also includes the recordings and presentations from each of the three virtual workshops.

The Office webpage also shares a general contact email address for the Office of Broadband that is regularly monitored to field stakeholder and community questions and feedback. Interested visitors can also subscribe to receive updates on the Office of Broadband’s activities and initiatives, including many of the engagements outlined in this plan.<sup>9</sup>

### 3. In-Person Community Engagement Public Workshops

The Office hosted six in-person workshops across Florida that were open to the public, as detailed in Figure 2.

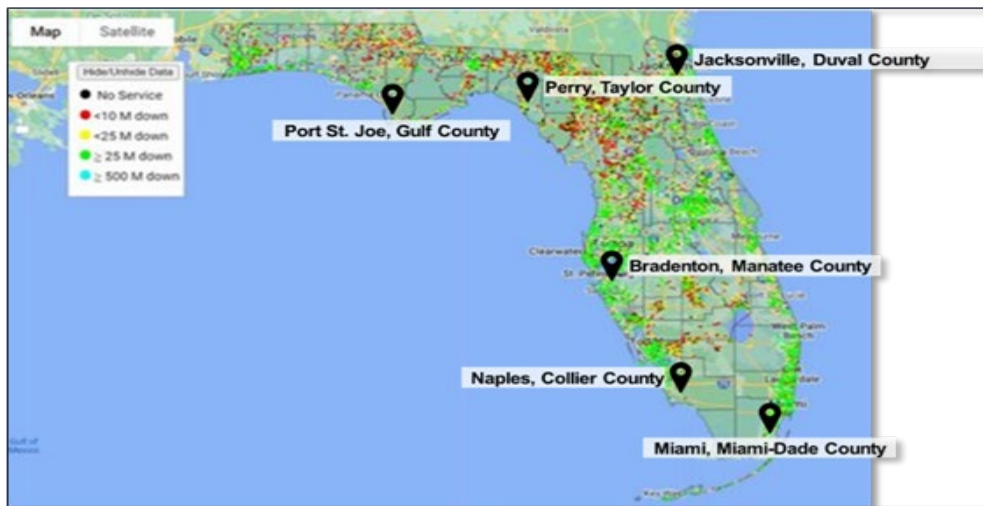


Figure 2: In-Person Community Engagement Public Workshop Locations

Workshops were scheduled for 90 minutes and focused on hearing directly from Floridians about barriers to Internet access and digital adoption and use. A sample workshop agenda is shown in Figure 3.

Topic #	Activity
1	Welcome and Introduction
2	Broadband 101

<sup>9</sup> FloridaCommerce Office of Broadband, *Sign-up to receive updates from DEO’s Office of Broadband*, <https://cloud.communications.deo.myflorida.com/Broadband>

3	Overview of Federal Broadband Programs
4	Group Discussion
5	Interactive Activity
6	Q&A / Public Comment

Figure 3: Sample In-Person Broadband Public Workshop Agenda

Workshops began with introductory remarks from FloridaCommerce and Office of Broadband leaders. Workshop facilitators then gave an overview of broadband and its current state in Florida to support shared understanding of broadband concepts. Facilitators shared information about the BEAD and Digital Adoption and Use plans including timelines, eligible uses of funding, and program priorities. Facilitators then held a group discussion and activity with participants about what community members use the Internet for, barriers to accessing the Internet, and solutions to identified barriers. The Office then heard public comments and answered questions from workshop participants.

American Sign Language (ASL) and Spanish interpretation services were offered at each workshop. Additionally, the FLORIDA Channel, a public affairs programming service funded by The Florida Legislature and produced and operated by WFSU-TV, broadcast three workshops on PBS multicast channels, cable systems, as well as public, education and government access channels across the state. The FLORIDA Channel also recorded and publicly posted the recordings of the three workshops it broadcast on its webpage.

#### 4. Virtual Community Engagement Public Workshops

The Office hosted three virtual workshops that were open to the public. Like the in-person workshops, the virtual workshops were scheduled for 90 minutes and focused on hearing directly from Floridians about barriers to Internet access and digital adoption and use. A sample workshop agenda is available in Figure 4.

Topic #	Activity
1	Welcome and Introduction
2	Broadband 101
3	Overview of Federal Broadband Programs
4	Interactive Activity
5	Q&A / Wrap Up

Figure 4: Sample Virtual Broadband Workshop Agenda

ASL interpretation services were offered at each workshop. Additionally, the FLORIDA Channel broadcast the virtual workshops on PBS multicast channels, cable systems, and public, education and government access channels across the state. The FLORIDA Channel also recorded and publicly posted the recordings of the three workshops it broadcast on its [webpage](#).

#### 5. Community and Broadband Events

In addition to participation in public events across the state, the Office also hosted the Florida Broadband Summit from September 21-22 in Orlando to bring together industry leaders, local government officials, workforce and economic development professionals, and community advocates to discuss the expansion of broadband Internet and its impact on infrastructure, business, and job growth in Florida. Because of the multi-faceted nature of broadband deployment efforts and the vast numbers of stakeholders involved in the efforts, the Office knows that multiple opportunities for public input and updates is a key step to delivering broadband coverage to the state.

## 6. Questionnaires

The Office developed questionnaires for stakeholder groups and Internet service providers to provide another feedback avenue.

The stakeholder questionnaire was distributed to 232 stakeholder groups and 29 responses were received. The questionnaire focused on gathering information about the covered populations (if any) the organization serves, feedback on Florida’s “community anchor institutions” definition, community programs to support Internet access, and feedback on how the Office of Broadband can improve access to the Internet, Internet capable devices, and digital skills in Florida.

The ISP questionnaire was sent to 30 Internet service providers and four responses were received. The questionnaire focused on gathering information about workforce needs, challenges to expanding broadband infrastructure, the ISP’s current income-restricted or low-cost offerings, and feedback on how the Office of Broadband can improve access to the Internet, Internet capable devices, and digital skills in Florida.

## 7. Interviews

Using NTIA guidance and interview guide examples, the Office conducted individual interviews with 32 organizations. Interview questions were tailored to the stakeholder group’s unique focus and impact on broadband deployment and digital adoption and use. Interviews focused on identifying barriers the organization or its members face related to broadband and digital adoption and use, solutions, and feedback on plan development.

## 8. Tribal Engagement

To include the voices of Florida’s federally recognized tribes in the plan development process, FloridaCommerce engaged the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida. Through tribal consultation letters, in-person and virtual meetings, and questionnaires, FloridaCommerce was able to learn the perspectives of Florida’s federally recognized tribes on the broadband needs of their communities. FloridaCommerce is committed to continued engagement with Florida’s federally recognized tribes, over the course of the BEAD development process, on strategies to expand broadband deployment and digital adoption for tribal populations.

## 9. ConnectedFlorida Map

The Office published the ConnectedFlorida map in June 2023.<sup>10</sup> This map was the culmination of significant efforts to visually demonstrate broadband project areas across the state of Florida. There are several layers of data including the Broadband Opportunity Program, the Capital Projects Fund – Broadband Infrastructure, Connect America, and others. The Office continues to value transparency, and the ConnectedFlorida map provides residents and businesses a tool to see planned and in progress work to improve connectivity across the state.

### *Scale of Outreach*

Table 2 displays the number of stakeholders invited to engage in the plan development process, categorized by entity type and engagement type. The “Total” column details the number of unique entities by type who were invited to participate in plan development in at least one of four engagement mechanisms. The “Engagement Mechanism” columns show the number of entities within that total who were invited to participate in each engagement. These summary numbers are subsets of the entity totals and demonstrate the extent of the Office’s outreach to various parties including all vulnerable populations as identified within the NOFO.

---

<sup>10</sup> FloridaCommerce, ConnectedFlorida Map, Accessed November 6, 2023, at <https://experience.arcgis.com/experience/54d3be208bae4eacad7303b50347de78>.

Table 2: Number of Engagement Stakeholder Entities by Type and Engagement Mechanism

Entity Type	Total	Engagement Mechanism			
		Invited to Interview	Invited to Public Workshop (In-Person)	Invited to Public Workshop (Virtual)	Invited to Complete Questionnaire
Private industry	78	24	46	48	50
Community anchor institutions	144	13	79	23	76
Government entities	133	32	122	42	36
Local Technology Planning Teams	63	63	63	63	63
Organizations supporting covered populations	72	27	56	21	29
Workforce and economic development organizations	25	6	16	7	6
Seminole Tribe of Florida	1	1	1	1	1
Miccosukee Tribe of Indians of Florida	1	1	1	1	1
<b>Grand Total</b>	<b>517</b>	<b>167</b>	<b>384</b>	<b>206</b>	<b>262</b>

### Plans for Ongoing Coordination

Transparency and stakeholder engagement are key tenets by which the Office operates. During each phase of these broadband and digital adoption and use efforts, the Office will remain transparent and engage stakeholders to align program priorities to Florida’s needs. Each new planning and implementation phase will be informed by more accurate mapping, local assistance to identify assets and address barriers, interdepartmental coordination, and workforce planning for all vulnerable populations as identified within the NOFO.

The Office will continue to use a variety of engagement activities and mechanisms to share information and updates about program development and implementation, including but not limited to the Office of Broadband webpage, FloridaCommerce listserv, ongoing LTPT meetings, and community and broadband events. Contact information for the Office is readily available on the Office of Broadband’s webpage, and inboxes are frequently monitored, should questions arise from residents or stakeholders. The Office will consistently communicate changes, updates, and additions to the program as they arise. In addition, the Office will include documentation and publication of any results and outcomes from the coordination efforts that it pursues.

Additionally, digital literacy program funding will be implemented in parallel with – and immediately

following – broadband infrastructure deployment. Full details on these initiatives and plans will be available in Florida’s Digital Adoption and Use Plan.

**2.3.1.1 Attachment:** As a required attachment, submit the Local Coordination Tracker Tool to certify that the Eligible Entity has conducted coordination, including with Tribal Governments, local community organizations, unions and work organizations, and other groups.

The list of stakeholders engaged, and specific stakeholder engagement activities conducted are included in Appendix I. Additional stakeholder details are available on our Local Coordination Tracker.

**2.3.2 Text Box:** Describe the formal tribal consultation process conducted with federally recognized Tribes, to the extent that the Eligible Entity encompasses federally recognized Tribes. If the Eligible Entity does not encompass federally recognized Tribes, note “Not applicable.”

Input from Florida’s federally recognized tribes were included in the development of Florida’s BEAD Five-Year Action Plan. The Office engaged Florida’s federally recognized tribes, the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida, and successfully captured their tribal perspectives on broadband needs in their communities, through formal tribal consultation letters, in-person and virtual meetings, and questionnaires. The Office is committed to continued engagement with Florida’s federally recognized tribes, over the course of the BEAD development process on strategies to expand broadband deployment and digital adoption for tribal populations.

**2.3.2.1 Optional Attachment:** As a required attachment only if the Eligible Entity encompasses federally recognized Tribes, provide evidence that a formal tribal consultation process was conducted, such as meeting agendas and participation lists.

FloridaCommerce has developed template letters that may be used to support the ongoing consultation process with Florida’s federally recognized tribes. Please see Appendix I.



## 2.4 Deployment Subgrantee Selection (Requirement 8)

2.4.1 Text Box: Describe a detailed plan to competitively award subgrants to last-mile broadband deployment projects through a fair, open, and competitive process.

The Office intends to follow the process outlined below to solicit applications from potential subgrantees for BEAD funding.

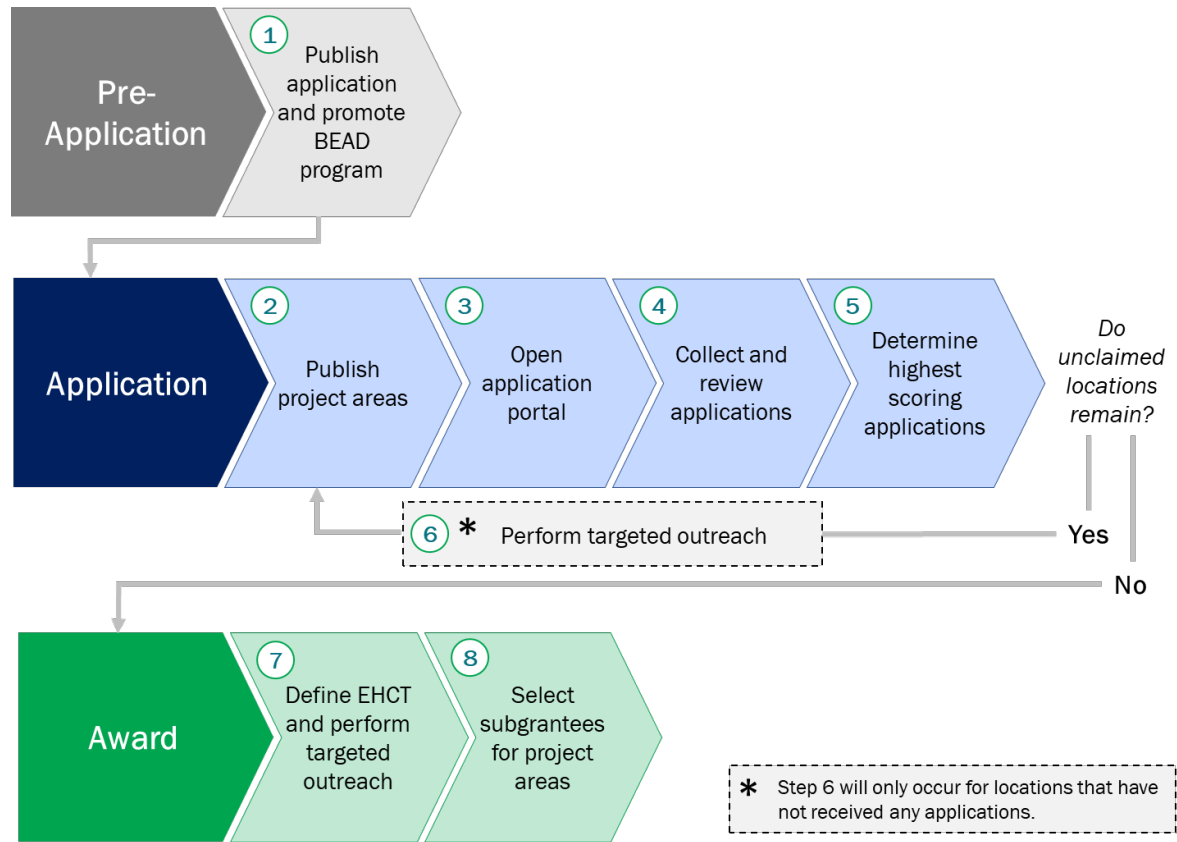


Figure 5: Deployment Subgrantee Selection Process

### Subgrantee Selection Process

#### 1. Publish application and promote BEAD Program

The Office of Broadband plans to publish the BEAD Program application on the program portal and promote the BEAD Program to various prospective subgrantees through the following means:

- Publish information on the FloridaCommerce Office of Broadband website.
- Promote opportunities through various means (i.e., press releases, website, and LTPT meetings) to reach a broad range of prospective subgrantees.
- Publish a BEAD Program Guidelines document similar to that currently available for the Broadband Opportunity and Capital Projects Fund Programs.
- Host a webinar to review the application and answer questions from prospective subgrantees.
- Post a program Frequently Asked Questions document to the Office website.

#### 2. Publish project areas

The Office of Broadband intends to define project areas eligible for bids in advance, giving providers the ability to select the specific project areas for which they will apply. In the case that a single provider submits applications for more than one project area, a unique application will be required for each area, though much of the general background content from one application can be used across multiple applications.

The Office will publish the areas on the designated portal where all BEAD Program activity will take place. For full detail on the project area definitions, see Section 2.4.6.

### **3. Open application portal**

The BEAD portal will be opened through the duration of a designed application period to receive applications for the project areas. Inquiries from prospective subgrantees can be made to the FloridaCommerce email address or by contacting the Office by mail or phone. The application portal will be open for at least 45 days to enable participation by a wide variety of applicants.

### **4. Collect and review applications**

A few specific activities will take place during this part of the process:

- Basic quality assurance checks will be completed on incoming applications. While it is the responsibility of prospective subgrantees to ensure the completeness of their applications, the Office benefits from initial checks to applications and will proactively communicate missing or incomplete sections of the application to the applicant to remedy them.
- Coordination between review teams will begin. The Office has extensive experience reviewing applications for deployment activities from the Broadband Opportunity and Capital Projects Fund Program application cycles. Coordinating review teams to speed up the transition from application receipt to application review can begin during this time.

### **5. Determine highest scoring applications**

Using the scoring criteria (Table 3 and Table 4), the Office will determine the highest scoring applications for the outlined project areas. These criteria provide a fair basis for comparison across applications. They also act as a safeguard against arbitrary decisions or any bias entering the selection process.

Once the scoring of applications for project areas is complete, preliminary notice of intent will be formed by the Office for possible awardees. A more complete understanding of unclaimed locations will be achieved as the subgrantee process continues for outstanding project areas.

The Office will repeat steps two through five, updating the list of remaining project areas with unserved and underserved locations until all locations are covered.

### **6. Perform targeted outreach (as needed)**

This step will occur if there are outstanding project areas that have yet to receive any applications. The Office reserves the right to reach out to providers and/or potential awardees of adjacent areas and discuss the expansion of existing coverage to areas that remain uncovered. The Office will not offer inducements, but targeted outreach will occur.

To address applications that may need revisions due to decisions made on adjacent areas, Florida's deployment subgrantee selection process is structured to allow for iterative application rounds until all unserved and underserved broadband serviceable locations are claimed. Targeted ISP outreach is embedded in the plan and will focus on proximate providers.

## **7. Identify Extremely High-Cost Threshold (EHCT) and perform final targeted outreach**

With all available applications received and a sense of how all unserved and underserved locations might be covered, the Office can identify the EHCT. Detail on the methodology and the potential uses of the EHCT are outlined in Sections 2.4.9 and 2.4.10. By determining the EHCT, the Office can proceed with confidence that it is expanding broadband deployment through the best and most appropriate technologies available that maximize the use of the BEAD funding across Florida.

## **8. Select subgrantees for project areas**

The Office will select and finalize all awardees in a timely manner as decisions are made for project areas. The Office of Broadband will follow the same procedure utilized throughout the Broadband Opportunity Program and will hire an independent vendor to act as the review team. Following application review and curing, this vendor requires three scorers for every application to provide a variety of perspectives while analyzing applications. Reviewers will be trained using a set of standard operating procedures developed to standardize the review process and avoid collusion, bias, conflicts of interest or arbitrary decisions. These review efforts will build upon the success of previous broadband deployment programs managed by the Office of Broadband. This includes making final award determinations and formally notifying subgrantee awardees as to the result and terms of their submissions. The Office intends for all unserved and underserved locations across Florida to be claimed at this point in the subgrantee selection process, aligning with the BEAD NOFO requirements.

### *Subgrantee Accountability Procedures*

The Office plans to use several accountability measures to establish oversight and create a monitoring presence over subgrantee performance. The transparent and proper use of taxpayer funds remains a key aim of the Office as it has been throughout the lifetime of the Broadband Opportunity and Capital Projects Fund Programs. The Office intends to use the accountability procedures outlined below in the implementation of the BEAD Program.

### *Disbursement of Funding*

Once an award has been made and a project commences, the Office intends to disburse funding to subgrantees only upon completion of the associated milestones. The Office will require each prospective subgrantee to certify that it has and will continue to have sufficient financial resources to cover its eligible costs for the project until the Office authorizes additional disbursements. The Office will monitor grantees to determine compliance with the financial requirements of 2 C.F.R. Part 200, including 2 C.F.R. Parts 200.300-309 and 2 C.F.R. Parts 200.328-330. Typically, ledgers, invoices, canceled checks, bank statements, and requisitions are reviewed to see whether the subrecipient has an adequate system of financial management. Office of Broadband staff may also make specific requests to review information or documentation relating to the financial management of a grant. The Office will monitor and update as new guidance is published. This includes updated guidance about Letter of Credit requirements, which will be conditionally waived.<sup>11</sup>

Importantly, Florida House Bill 1209 (Chapter 2023-202 Laws of Florida) requires Florida's state agencies – including FloridaCommerce – to include language in their agreements that provides for the payment of specified invoices to certain counties or municipalities for certain verified and eligible performance. As of July 1, 2023, a rural community or rural area of opportunity, as those terms are defined in section 288.0656(2), Florida Statutes, may receive payment for costs under its grant agreement with FloridaCommerce for “verified and eligible performance that has been completed in

---

<sup>11</sup> BEAD Letter of Credit Waiver, BroadbandUSA. Accessed on November 6, 2023 at <https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD-Letter-of-Credit-Waiver>

accordance with the terms and conditions set forth in the agreement.” As such, county or municipal grantees that meet certain grant requirements may receive direct payment for performance under its grant agreement with FloridaCommerce without being required to spend its own funds first.

### Monitoring and Reporting

Pursuant to 2 C.F.R. Part 200.332, FloridaCommerce is required to monitor its subrecipients to promote program compliance. The Office will monitor each project throughout its lifecycle. Monitoring may be conducted when approximately 15 percent of the awarded funds have been disbursed to review that the recipient has systems in place to properly comply with program requirements such as administrative, civil rights, financial management, and auditing requirements. Monitoring may also take place once construction is nearing completion to review that the subrecipient has continued to comply with the program requirements, as well as to check that requirements related to construction have been followed. Recipients will be required to submit quarterly status reports that detail progress made on the project and what steps will be taken in the next quarter.

### Audits

Pursuant to 2 C.F.R. Part 200 Subpart F, recipients expending \$750,000 or more from all federal sources within a fiscal year are required to have a Single Audit conducted for that fiscal year. As such, the Office plans to conduct audits as prescribed to offer an additional layer of oversight during the BEAD Program performance period. This practice is consistent with procedures from the Broadband Opportunity Program.<sup>12</sup> As new guidance on subgrantee accountability procedures is published, the Office will explore adjusting program requirements accordingly.

### Conflicts of Interest

Pursuant to section 112.311, Florida Statutes, the following people, or their immediate family members shall not have any direct or indirect financial interest in any contract, subcontract, or the proceeds thereof for work to be performed in connection with the grant during their tenure or for one year thereafter.

- Employees or agents of the recipient who exercise any function or responsibility for the BEAD Program.
- Officials of the recipient, including members of the governing body.

These guidelines are in line with the procedures from the Broadband Opportunity Program.<sup>13</sup> The Office requires all subrecipients to provide a Conflict-of-Interest Policy prior to agreement execution.

### Financial Management

The FloridaCommerce Office of Broadband will monitor subrecipients to determine compliance with the financial requirements of 2 C.F.R. Part 200, including 2 C.F.R. Parts 200.300-309 and 2 C.F.R. Parts 200.328-330, and other regulations applicable to the BEAD Program, including section 218.33, Florida Statutes. Typically, ledgers, invoices, canceled checks, bank statements, and requisitions are reviewed to see whether the subrecipient has an adequate system of financial management. FloridaCommerce staff may also make specific requests to review information or documentation relating to the financial management of a grant.

These financial management provisions are in line with the guidelines from the Broadband Opportunity

---

<sup>12</sup> FloridaCommerce Office of Broadband, BOGP Program Guidelines, Accessed on October 23, 2023 at: [https://www.floridajobs.org/docs/default-source/ra-appeals-commission/program-guidelines.pdf?sfvrsn=6e5b54b0\\_2](https://www.floridajobs.org/docs/default-source/ra-appeals-commission/program-guidelines.pdf?sfvrsn=6e5b54b0_2)

<sup>13</sup> Ibid.

Program and Capital Projects Fund.<sup>14,15</sup> Further, letter of credit and additional BEAD requirements that build upon this standard will be incorporated and updated as new guidance emerges from the NTIA.

#### Clawback Provisions

The Office will include provisions allowing for the recoupment of previously disbursed funds in agreements between FloridaCommerce and the subgrantee. Where subgrantees used BEAD funds for activities or procurements outside the scope of the agreement with the state, the Office will pursue reclaiming those funds.

**2.4.2 Text Box:** Describe how the prioritization and scoring process will be conducted and is consistent with the BEAD NOFO requirements on pages 42 – 46.

The following is the overview of scoring criteria and weights for Priority and Other Last Mile Projects. Both the scoring categories as well as the criteria components are largely modeled on the Broadband Opportunity and Capital Projects Fund Programs' evaluation criteria.<sup>16</sup> The Office has experience evaluating project applications with this scoring criteria, and providers in the state are already familiar with these scoring parameters. These facts together support the timely deployment of broadband infrastructure in Florida.

As described in the BEAD NOFO, both primary and secondary criteria will be utilized to score projects. Primary criteria will account for at least 75% of the total scoring or bidding credits, and includes Minimal BEAD Program Outlay, Affordability, and Fair Labor Practices. Secondary criteria can account for no more than 25% of total scoring or bidding credits, and includes all other criteria not classified as primary.<sup>17</sup>

To address applications that may need revisions due to decisions made on adjacent areas, Florida's deployment subgrantee selection process is structured to allow for iterative application rounds until all unserved and underserved broadband serviceable locations are claimed. Targeted ISP outreach is embedded in the plan and will focus on proximate providers. The Office is committed to transparency around ISP outreach and communication and has long recognized the importance of maintaining transparency in the state and upholds its belief that competition is an essential driver of the state's economy.

Scoring will occur at each application round according to the associated scoring category (i.e., Priority Broadband Project or Other Last Mile Project) as detailed in 2.4.1 within Step 5: Determine highest scoring applications. For competing proposals for the same project area, the applicant whose application receives the highest score according to the established scoring criteria will be tentatively selected for the award. Additional application rounds and targeted outreach may be held to address instances of unclaimed locations. Once all project areas have received applications, the Office will use Step 7: Define EHCT to determine which areas will be served through Priority or Other Last Mile deployment methods and finalize awards based on the scoring rubric below.

**2.4.2.1 Attachment:** As a required attachment, submit the scoring rubric to be used in the subgrantee

---

<sup>14</sup> Ibid.

<sup>15</sup> FloridaCommerce Office of Broadband, Capital Projects Fund – Infrastructure, Accessed on November 6, 2023 at: [https://www.floridajobs.org/docs/default-source/community-planning-development-and-services/broadband/capital-projects-fund-guidance-states-territories-and-freely-associated-states-\(1\).pdf?sfvrsn=4a8459b0\\_2](https://www.floridajobs.org/docs/default-source/community-planning-development-and-services/broadband/capital-projects-fund-guidance-states-territories-and-freely-associated-states-(1).pdf?sfvrsn=4a8459b0_2)

<sup>16</sup> FloridaCommerce Office of Broadband, Broadband Opportunity Program Scoring and Evaluation Criteria, Accessed on October 23, 2023 at: [https://www.floridajobs.org/docs/default-source/community-planning-development-and-services/broadband/broadband-opportunity-program-scoring-and-evaluation-criteria.pdf?sfvrsn=25f657b0\\_4](https://www.floridajobs.org/docs/default-source/community-planning-development-and-services/broadband/broadband-opportunity-program-scoring-and-evaluation-criteria.pdf?sfvrsn=25f657b0_4) and FloridaCommerce Office of Broadband, Capital Projects Fund – Infrastructure, Accessed on November 6, 2023 at [https://www.floridajobs.org/docs/default-source/community-planning-development-and-services/broadband/cpf-scoring-and-evaluation-criteria-\(1\).pdf?sfvrsn=e50958b0\\_2](https://www.floridajobs.org/docs/default-source/community-planning-development-and-services/broadband/cpf-scoring-and-evaluation-criteria-(1).pdf?sfvrsn=e50958b0_2)

<sup>17</sup> NTIA, BEAD NOFO Pg. 44 – 45, Accessed on November 21, 2023 at <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf>

selection process for deployment projects. Eligible Entities may use the template provided by NTIA, or use their own format for the scoring rubric.

### Priority Broadband Projects

Applications that propose constructing end-to-end fiber optic facilities to all BSLs in a Project Funding Area will be defined as a Priority Broadband Project and scored according to the criteria proposed below.

Table 3: Priority Broadband Projects Scoring Rubric

	Scoring Criteria	Criteria Components	Maximum Points (500)	% of Total
Primary	1. Minimal BEAD Program Outlay	1.1 Amount of funding requested to provide service to a project area.	320	64%
	2. Affordability	2.1 Pricing of 1G symmetrical service option	30	6%
	3. Fair Labor Practices	3.1 Proven track record of and/or specific plans and commitments for adhering to fair labor standards	30	6%
Secondary	4. Speed to Deployment	4.1 Detailed, reasonable project schedule	30	6%
	5. Workforce Development and Job Quality	5.1 Economic development & workforce development impacts	20	4%
	6. Meeting Prior Federal Commitments	6.1 Rural Digital Opportunity Fund (RDOF) commitment with or without deployment	30	6%
	7. Local Coordination	7.1 Letters of support from county commissioners, city councils, tribal governments, Local Technology Planning Team, or Broadband Committee	10	2%
		7.2 Record of local or tribal government consultation	10	2%
	8. Open Access	8.1 One or more committed ISPs beyond applicant with signed agreements or contracts	10	2%
9. Speed of Network and Other Technical Capabilities	9.1 Network capacity and scalability	10	2%	

### 1. Minimal BEAD Program Outlay (320 total points)

<i>320 points</i>	<b>1.1 Total amount of funding requested</b>
<p>Points will be awarded according to the total amount of BEAD funding requested to serve the project area in the application. The amount of funding requested takes into consideration both the total projected cost and the applicant's proposed match. The proposed match can include in-kind contributions, or non-cash donations of property, goods, or services, such as the waiver or fees associated with access to rights-of-way, pole attachments, conduits, easements, or access to other types of infrastructure, as described in the BEAD NOFO.</p> <p>The application requesting the least amount of BEAD funding will be awarded the maximum number of points (320 points). All other applications for that project area will receive a proportion of the points available according to the amount of funding they requested in relation to the lowest requested amount. For example, application requesting least amount of BEAD funding = 320; if application's requested funding is 10% higher than application requesting the least amount of BEAD funding then points = <math>320/1.10 = 291</math> points, and so on.</p>	

### 2. Affordability (30 total points)

<i>30 points</i>	<b>2.1 Price offering for 1 Gbps symmetrical plan</b>
<p>Maximum points will be awarded to the application with the lowest total monthly price for 1 Gbps symmetrical service, inclusive of all taxes, fees, and charges. For other applications, 1 point will be deducted for every \$1 above the lowest price offering for that designated project area, to a maximum of a 20-point deduction. For example, application with lowest total monthly price for 1 Gbps = 30; if application is \$5 higher than the lowest total monthly price for 1 Gbps then points = <math>30 - 5 = 25</math> points, and so on.</p>	

### 3. Fair Labor Practices (30 total points)

<i>30 points</i>	<b>3.1 Proven track record of adhering to fair labor standards</b>
<p>Prospective subgrantees must provide a narrative and evidence of plans to comply with federal labor and employment laws (6 points), disclosure of prospective subgrantee violations (6 points), disclosure of contractor and/or subcontractor violations (6 points), wage information (6 points), and the provision of workplace safety committees (6 points). Applicants will receive either a full 6 points in each of these categories, or none.</p> <p>For new market entrants, prospective subgrantees must submit plans to ensure compliance with federal and state labor and employment laws (30 points). These plans must address how the applicant will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors.</p>	

### 4. Speed to Deployment (30 total points)

<i>30 points</i>	<b>4.1 Detailed, reasonable project schedule</b>
<p>Points will be awarded according to the following factors:</p> <ul style="list-style-type: none"> <li>• Less than two years until full deployment. (10 points)</li> <li>• Prospective subgrantee provides a narrative with a detailed project schedule, which is</li> </ul>	

structured, clear, and consistent with committed deadlines. (10 points)

- Identification of key execution risks and mitigation plans. (10 points)

Speed to deployment will also be a material term of the subgrantee contract to make sure proposed timelines are met.

#### 5. Workforce Development and Job Quality (20 total points)

20 points	5.1 Economic development & workforce development impacts
<p>Points will be awarded according to the following factors across residents, businesses, farmers and agricultural customers, CAIs, and others:</p> <ul style="list-style-type: none"><li>• Narrative describing how project will include local hires and provide opportunities for local hires such as apprenticeship programs, job fairs, and training programs. (14 points). Depending on the geography and demography of the prospective subgrantee’s project area, the narrative must describe how the project will impact the following:<ul style="list-style-type: none"><li>• Residents: ability to telework, engage in remote learning, facilitate telehealth (including the use of telemedicine and electronic health records, new housing starts, etc.)</li><li>• Businesses: degree of competitiveness, market expansion, workforce development, job creation, attraction of new business establishments, etc.</li><li>• Farmers and agricultural use customers: farming efficiency and productivity, new applications for precision agriculture, etc.</li><li>• Community anchor institutions: enhancement to capabilities to execute the institution’s mission in a more effective and efficient manner (across schools, libraries, hospitals, clinics, social service centers, community gathering centers, etc.)</li><li>• Other: public safety improvements; other complementary infrastructure improvements; etc.</li></ul></li><li>• Substantive evidence demonstrating the impact of broadband within the project area. (3 points)</li><li>• Letters of support describing the project’s impact specific to the target customers’ circumstances. (3 points)</li></ul>	

#### 6. Meeting Prior Federal Commitments (30 total points)

30 points	6.1 Meeting prior federal commitments
<p>Points will be awarded according to the following factors:</p> <ul style="list-style-type: none"><li>• Prospective subgrantees whose parent company and/or associated subsidiaries have not been awarded Rural Digital Opportunity Program (RDOF) funding will receive the full 30 points.</li><li>• Prospective subgrantees whose parent company and/or associated subsidiaries have been awarded RDOF funding and have broken ground on their projects in Florida will receive the full 30 points.</li><li>• Prospective subgrantees whose parent company and/or associated subsidiaries have been awarded RDOF funding and have <b>NOT</b> broken ground on their projects in Florida will receive 0 points.</li></ul>	



The Office of Broadband will coordinate with the Federal Communications Commission to determine progress on RDOF-funded projects for prospective subgrantees and will require a certification from prospective subgrantees on RDOF project status, where applicable.

7. Local Coordination (20 total points)

<i>10 points</i>	7.1 Letters of support from county commissioners, city councils, tribal governments, Local Technology Planning Teams, or Broadband Committees
Full points (10 points) will be awarded to prospective subgrantees that can provide letters of support from county commissioners, city councils, tribal governments, Local Technology Planning Team, or Broadband Committee with their applications. Letters of support and consultations speak to local involvement with local, tribal, and regional entities.	

<i>10 points</i>	7.2 Record of local or tribal government consultation
Full points (10 points) will be awarded to prospective subgrantees that can provide records of local or tribal government consultation. Note that a tribal resolution is required from each tribal government on whose lands the infrastructure will be deployed and is a minimum requirement (not scored) as described in Deployment Project Tribal Consent.	

8. Open Access (10 total points)

<i>10 points</i>	8.1 Signed agreements or contracts with other ISPs
Prospective subgrantees proposing projects that support two or more committed ISPs that are unaffiliated with the prospective subgrantee will receive points under open access. Points will be awarded for each signed agreement or contract with other ISPs beyond the applicant as a demonstration of a provider’s commitment the system is open access in deed and name. Two points will be awarded for each signed agreement or contract with a maximum of 10 points.	

9. Speed of Network and Other Technical Capabilities (10 total points)

<i>10 points</i>	9.1 Network capacity and scalability
Points will be awarded for applications based on speed, latency, and other technical capabilities:	
<ul style="list-style-type: none"> <li>• Download speeds (3 points): Applications that can demonstrate that download speeds exceeding 100 Mbps will be made available will be awarded the full 3 points.</li> <li>• Upload speeds (3 points): Applications that can demonstrate that upload speeds exceeding 20 Mbps will be made available will be awarded the full 3 points.</li> <li>• Latency (2 points): Applications that can demonstrate that the latency less than 100 milliseconds will be awarded the full 2 points.</li> <li>• Other technical capabilities (2 points): Applications that can demonstrate that proposed technology is of lower cost for both deployment and infrastructure maintenance over the course of the federal interest period for BEAD will be awarded the full 2 points.</li> </ul>	

**Other Last Mile Broadband Projects (Non-priority projects)**

Applications that do not propose constructing end-to-end fiber optic facilities to all BSLs in a Project Funding Area will be defined as an Other Last-Mile Broadband Project and scored according to the

criteria proposed below.

Table 4: Other Last Mile Broadband Projects Scoring Rubric

	Scoring Criteria	Criteria Components	Maximum Points (500)	% of Total
Primary	1. Minimal BEAD Program Outlay	1.1 Amount of funding requested to provide service to a project area.	320	64%
	2. Affordability	2.1 Pricing of 100/20 Mbps service option	30	6%
	3. Fair Labor Practices	3.1 Proven track record of and/or specific plans and commitments for adhering to fair labor standards	30	6%
Secondary	4. Speed to Deployment	4.1 Detailed, reasonable project schedule	30	6%
	5. Workforce Development and Job Quality	5.1 Economic development & workforce development impacts	20	4%
	6. Meeting Prior Federal Commitments	6.1 Rural Digital Opportunity Fund (RDOF) commitment with or without deployment	30	6%
	7. Local Coordination	7.1 Letters of support from county commissioners, city councils, tribal governments, Local Technology Planning Teams, or Broadband Committee	10	2%
		7.2 Record of local or tribal government consultation	10	2%
	8. Open Access	8.1 One or more committed ISPs beyond applicant with signed agreements or contracts	10	2%
9. Speed of Network and Other Technical Capabilities	9.1 Network capacity and scalability	10	2%	

1. Minimal BEAD Program Outlay (320 total points)

320 points	1.1 Minimal BEAD Program Outlay
The Minimal BEAD Program Outlay scoring criterion is the same for Other Last-Mile Deployment Broadband Projects and Priority Broadband Projects.	

2. Affordability (30 total points)

30 points	2.1 Price offering for 100/20 Mbps plan
-----------	---

Maximum points will be awarded to the application with the lowest total monthly price for 100/20 Mbps service, inclusive of all taxes, fees, and charges. For other applications, 1 point will be deducted for every \$1 above the lowest price offering for that designated project area, to a maximum of a 20-point deduction.

3. Fair Labor Practices (30 total points)

<i>30 points</i>	3.1 Proven track record of adhering to fair labor standards
The Fair Labor Practices scoring criterion is the same for Other Last-Mile Deployment Broadband Projects and Priority Broadband Projects.	

4. Speed to Deployment (30 total points)

<i>30 points</i>	4.1 Detailed, reasonable project schedule
The Speed to Deployment scoring criterion is the same for Other Last-Mile Deployment Broadband Projects and Priority Broadband Projects.	

5. Workforce Development and Job Quality (20 total points)

<i>20 points</i>	5.1 Economic development & workforce development impact
The Workforce Development and Job Quality scoring criterion is the same for Other Last-Mile Deployment Broadband Projects and Priority Broadband Projects.	

6. Meeting Prior Federal Commitments (30 total points)

<i>30 points</i>	6.1 Meeting prior federal commitments
The Meeting Prior Federal Commitments scoring criterion is the same for Other Last-Mile Deployment Broadband Projects and Priority Broadband Projects.	

7. Local Coordination (20 total points)

<i>10 points</i>	7.1 Letters of support from county commissioners, city councils, tribal governments, Local Technology Planning Team, or Broadband Committee
The Local Coordination scoring criterion is the same for Other Last-Mile Deployment Broadband Projects and Priority Broadband Projects.	

<i>10 points</i>	7.2 Record of local or tribal government consultation
The Local Coordination scoring criterion is the same for Other Last-Mile Deployment Broadband Projects and Priority Broadband Projects.	

8. Open Access (10 total points)

<i>10 points</i>	8.1 Signed agreements or contracts with other ISPs
The Open Access scoring criterion is the same for Other Last-Mile Deployment Broadband Projects and Priority Broadband Projects.	

## 9. Speed of Network and Other Technical Capabilities (10 total points)

10 points	9.1 Network capacity and scalability
<p>Points will be awarded for applications based on speed, latency, and other technical capabilities:</p> <ul style="list-style-type: none"><li>• Download speeds (3 points): Applications that can demonstrate that download speeds exceeding 100 Mbps will be made available will be awarded the full 3 points</li><li>• Upload speeds (3 points): Applications that can demonstrate that upload speeds exceeding 20 Mbps will be made available will be awarded the full 3 points</li><li>• Latency (2 points): Applications that can demonstrate that the latency less than 100 milliseconds will be awarded the full 2 points</li><li>• Other technical capabilities (2 points): Applications that can demonstrate that proposed technology is of lower cost for both deployment and infrastructure maintenance over the course of the federal interest period for BEAD will be awarded the full 2 points</li></ul>	

2.4.3 Text Box: Describe how the proposed subgrantee selection process will prioritize Unserved Service Projects in a manner that ensures complete coverage of all unserved locations prior to prioritizing Underserved Service Projects followed by prioritization of eligible CAIs.

The Office of Broadband aims to promote unserved service projects so that there is complete coverage in the state. The Office will award funding in a manner that prioritizes unserved service projects followed by underserved locations within the state as outlined in the BEAD NOFO. The Office will do so through a variety of strategies:

1. To help incentivize universal coverage, the Office will define project areas in a bundled fashion, to prevent uncovered, unserved areas by combining areas that may be less popular with areas that may be more desirable.
2. The Office may also conduct multiple expedited application rounds, if needed, to gain an understanding of the application landscape before awards are finalized and announced. Based on the Office's experience with prior state-funded and federally funded broadband grant programs, this may help give a holistic picture of coverage before final decisions are made. This iterative approach will also help the Office prioritize unserved locations before addressing underserved locations.
3. Finally, the Office will conduct targeted outreach for project areas that have not received any applications. This targeted outreach is built into the subgrantee selection process as shown in Step 7 in the [Deployment Subgrantee Selection](#) section. The Office will collaborate with providers to encourage expansion into adjacent areas where needed.
4. The Office plans to leverage the existing list of CAIs developed over time and published in the Challenge Process. Subsequent funding that remains can be routed to projects to reach CAIs with this information available and updated through the Challenge Process.

2.4.4 Text Box: If proposing to use BEAD funds to prioritize non-deployment projects prior to, or in lieu of the deployment of services to eligible CAIs, provide a strong rationale for doing so. If not applicable to plans, note "Not applicable."

The Office proposes to simultaneously dedicate a portion of BEAD funds for training, workforce, and cybersecurity initiatives in support of deployment, as achieving access goals will only be possible if

Florida's broadband-related workforce is scaled up to meet the needs of building out communities' access to broadband at acceptable speeds. The Office aims to be a strong catalyst in the development of a sufficient and sustainable supply of a highly skilled broadband workforce. This initiative will address the urgent need for more skilled workers in broadband-related fields, by recruiting individuals throughout the state into workforce development opportunities and jobs related to BEAD. The decision is also based on a core contingency: for there to be reliable and ongoing service to eligible CAIs, there must be a sufficient talent pipeline to supply, operate, and maintain this service.

To balance the imperative for training, workforce, and cybersecurity initiatives with the flexibility required for subgrantee selection, the Office plans to dedicate approximately \$200 million of BEAD funding for non-deployment use. Workforce training and cybersecurity initiatives must occur as soon as possible and is a priority for Florida. Based on the most recent FCC broadband map and the awards that the state has issued thus far, the Office is confident that it will be able to reach every location, both unserved and underserved, as identified in our proposal. The Office plans to fulfill BEAD's core goal of covering all unserved and underserved locations and will build in the funding flexibility required to achieve this while enhancing the workforce in the state.

Workforce development is a large and multi-faceted economic priority for Florida. Providers cannot recruit, hire, and train the massive workforce required without strategic collaboration among the public and private sectors. To achieve 100 percent connectivity in the state, and maintain and operate the four hundred thousand newly connected locations and thousands of miles of newly deployed fiber technology, the Office must proactively and expediently work with its partners, including the Florida College System, technical and career centers, CareerSource Florida, and local workforce development boards, to identify strategies and programming that help promote the sustainable development and growth of a highly skilled workforce. For more information on work that the Office and its partners are planning related to training and workforce, please see Workforce Readiness (Requirement 12).

To support this initiative, on October 3, 2023, FloridaCommerce engaged an extensive group of broadband-related workforce stakeholders to identify needs, challenges, and pathways to a stronger broadband workforce. Those findings are summarized below.

Participants:

- President Madeline Pumariega, Miami Dade College
- Commissioner Manny Diaz, Florida Department of Education
- Adrienne Johnston, CEO & President, CareerSource Florida
- Rick Beasley, Executive Director, CareerSource South Florida
- Richard Zinno, VP of Strategic Development, MasTec
- Jesus Lebana, SVP of Corporate Operations, MasTec
- Rodrick Miller, Beacon Council
- Fermin Vazquez, North Campus President, Miami Dade College
- Jorge Gonzalez, Director, Business Innovation & Technology Center, Miami Dade College
- Meredith Ivey, Deputy Secretary of Community Development, FloridaCommerce
- TJ Villamil, Deputy Secretary of Economic Development, FloridaCommerce
- Sean Lewis, Chief, Office of Broadband

*Purpose & Goal of Roundtable:*

Building out a highly skilled broadband workforce is critical to achieving Florida’s goal of 100 percent broadband connectivity within the next five years. To achieve this, we need to identify and document the skills, certificates, credentials, and pathways necessary to support the expansion of broadband-related professions as the state prepares to make significant investments in broadband infrastructure and connectivity. Additionally, an available and skilled workforce is an important part of the “capital stack” in Florida economic development. For most companies looking to begin or expand operations, the number one factor affecting their ability is access to workforce talent and workforce training.

By working in cooperation, public, private, education, and local workforce partners can design and implement programs to train new workers and aid existing workers in transitioning to broadband-related occupations, including registered apprenticeships and vocational training. By creating interest and clearly identifying career pathways, Florida has an opportunity to build a pipeline of broadband workforce talent just as we are doing with other sectors including nursing, manufacturing, and electrical. Many broadband-related jobs do not require a four-year degree but may require certifications and licensing. This is an enticing market with potential for a very lucrative career and opportunities for advancement, not only for students, but also older unemployed and underemployed Floridians who don’t just want a job, but a career path. Broadband related occupations include technicians, installers, linemen, operators, laborers, and IT, cybersecurity, and telecommunications specialists.

*BEAD Program: Strategies to Develop a Skilled Broadband Workforce that both Supports Greater Access to Broadband and Elevates Skilled Career Opportunities for Floridians*

In the BEAD Program plan, Florida must describe its strategy to develop a skilled, diverse broadband workforce by:

- Ensuring that award recipients support the development and use of a highly skilled workforce capable of carrying out work in a manner that is safe and effective;
- Develop and promote sector-based partnerships among employers, education and training providers, workforce partners, and community-based organizations that provide relevant training and wrap-around services to support workers’ ability to access and complete training;
- Create on-ramps into broadband-related jobs, maintain job quality for new and incumbent workers engaged in the sector, and continually engage with community-based organizations throughout the planning and implementation process; and
- Ensure that the job opportunities created by the BEAD Program and other broadband funding programs are available to a broad-based pool of workers.

*Roundtable Discussion Takeaways:*

Broadband Workforce Data – What We Know

- There will be 3,600 new broadband construction jobs per one billion of construction spending. To put this into perspective, Florida can access \$1.16 Billion in total for BEAD funding over the next five years. While this will result in significant investments across our state, we need to be forward thinking about workforce needs and leverage these funds in a way that yield results far after the funding runs out.
- The current Standard Occupational Codes (SOC) used by the Bureau of Labor Statics (BLS) and North American Industry Classification System (NAICS) industry codes do not include broadband specific codes, making it difficult to estimate the size of Florida’s current broadband workforce.
  - There are currently nine (9) occupations that currently used to identify workers in this

space, but they are not broadband specific:

1. Telecommunications Equipment Installers and Repairers, Except Line Installers
  2. Telecommunications Line Installers and Repairers
  3. Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel
  4. Customer Service Representatives
  5. Construction Laborers
  6. Electrical Power-Line Installers and Repairers
  7. Project Management Specialists and Business Operations Specialists, All Other
  8. First-Line Supervisors of Mechanics, Installers, and Repairers
  9. Electronics Engineers, Except Computer
- Broadband infrastructure jobs will require new skills such as fiber cable splicing that do not yet have a Standard Occupational Code (SOC), as well as more traditional utility and construction skills. This lack of job and industry codes also makes it difficult to determine if individuals are leaving the workforce for other states, retiring, or moving on to other careers.
  - Although Florida is number one in the nation for net migration, it is very unlikely that in-migration will oversupply a particular profession or cluster of professions. Strategic partnerships and investments will be key to ramping up broadband skills within Florida's workforce over the next five years.
  - Among the most populous states, Florida continues to enjoy a historically low unemployment rate and continues to far better than the nation with its labor force. However, we need to be intentional with our workforce strategy:
    - We have about 469,000 job listings and 300,000 people who are unemployed and looking for a job, and so, there is high competition for those who are seeking a job, and herein lies an opportunity.
    - Broadband-related industries are going to have to market to a mix of:
      1. Employed Floridians in need of hard skills;
      2. Unemployed and job-seeking Floridians who likely need hard skills; and
      3. Floridians who are not actively in the workforce (including students) but could be enticed if a clear pathway was presented to them.

#### Identifying Industry Needs & Challenges

- There is not just a shortage of workers, but major challenges associated with finding workers and funneling workers. Installing fiber, fiber splicers, and lineman - those are the jobs we need to deliver to our main customers today.
- Recruiting continues to be by word of mouth; very few come from colleges or workforce partners. However, traditional strategies to recruit and develop employees for career development (word of mouth, paying your dues, etc.) are no longer sufficient to meet industry demand.
- Companies like MasTec are taking matters into their own hands but these efforts alone will

not keep up with the needs of the industry as a whole:

- *Entry Level:* MasTec has set up national training academies to help bridge the gap on workforce needs for entry level workers; there are not any pre-existing educational or degree requirements for entry level workers.
- *Management/Supervisors/Foreman:* Companies like MasTec will not be profitable unless they have capable foreman, supervisors, and upper and middle management in place. These positions cannot be recruited as pure entry level and are much more challenge to replicate without having spent time in the industry previously.
- We need a dedicated strategy for management positions, if we can identify individuals in the workforce who have transferrable skills, we may be more easily get them ready to manage crews as opposed to the traditional “pay your dues” model.
  - *Bottom Line:* Managing crews is vital for profitability; training comes at a great cost to the business but is necessary.
- Poaching and competition for skilled workers from utilities, competitors, and customers (like Internet Service Providers), exacerbates the current problems and hurts return on investment made by companies like MasTec.
- If all subsidies and investments from the state only go to Internet Service Providers, we will miss the mark on workforce needs. In other words, relying solely on the private sector to train up a capable broadband workforce will not yield sustainable results. Community partners and state/local agencies/boards need to be involved in helping grow a sustainable talent pipeline.

#### Recruiting Broadband Workforce Talent - Identifying Pathways & Program “Prototypes”

- We can work together to develop pathways and program prototypes that can be included in the BEAD Action Plan and replicated with colleges, universities, and local workforce boards statewide to promote recruitment of any Floridian into workforce development opportunities and jobs related to BEAD.
- Florida needs to create an apprenticeship and pre-apprenticeship “prototype.” We must begin by identifying targeted strategies for different groups and map out a crosswalk to broadband jobs: K-12, colleges and university students, veterans, individuals with transferable skills, unemployed and underemployed Floridians, etc.
- Local workforce boards have the capacity and are ready to partner on an apprenticeship program, replicate it statewide, along with a pre-apprenticeship piece that we can build within the high school system. Additionally, there are funds through CareerSource Florida/local workforce boards to subsidize wages up to a year for an apprenticeship program and then expand to on-the-job training to defray some of the employer costs (such as labs and test gear).
- Workforce and education partners need to be weaving broadband occupations into the priority professions we identify high schools, tech colleges, and 2-year college students for. We should also be looking to bring in the private sector into our college system and leverage their unique resources.
- Miami Dade College has a veterans success center campus that provides a connection to onboarding veterans as they are coming out of the military. This is a great population to be focused on - they have a mission, they have a purpose, and how do we help them maintain that purpose as they transition to civilian life? How do we bridge that space?



- Miami Dade College’s partnership between the college’s nursing program and Baptist Health – wherein nurses who complete the program make a two-year commitment – is a great example and a model that if deployed could yield success.
- Another example is Tallahassee Community College, they have a program with contractors doing electrical, pulling people in off the street, push that down into a partnership with the state college and k-12 system.

#### “Get There Faster” Version of Broadband (Florida’s Workforce System)

- Marketing job training opportunities for broadband-related professions is a necessary part of propping up such programs at colleges, tech colleges, and local workforce boards.
- There is an opportunity to collaborate with CareerSource Florida on the “Get there Faster” initiative, which utilizes Workforce Innovation and Opportunity Act (WIOA) grants to ensure Floridians have access to education and training that lead to career paths for in-demand, middle-to-high wage jobs.
- Trades are an old name to something that is becoming much more tech oriented and very American, we should be reshaping to what we offer the students, and show that connection to technology, innovation, national security, and the higher purpose of bringing access and connectivity to our entire state. We need to remember that beyond the lineman, which are essential, there are needs for communications and IT/cybersecurity professionals as well.
- To build out our workforce and ramp up, we first need to find a way to put these occupations and careers “on the map.” From K-12 to individuals already in the workforce, there is a genuine lack of awareness on the types of high-quality broadband occupations that exist. For K-12, let’s make sure broadband employers are showing up to career day fairs, and why not target mission-oriented groups with leverage skills, like veterans?
- Additionally, there are several existing tools that can be easily leveraged to support this type of initiative. For example, Employ Florida, is an easily accessible online portal that is used by job seekers, employers, and workforce partners across the state. Employ Florida is an online full- service employment center that shares job openings and helps job seekers create resumes and look for training. (EmployFlorida.com)
- We also need to tailor these efforts by communities and zip codes. If you look at what the Florida Chamber is doing with their Gap Map, we can target unserved and underserved communities and help get students from all backgrounds interested from a young age in these broadband occupations, and simultaneously support digital literacy efforts within those communities.
- There are funding sources that can be braided into this, apprenticeships are a great example and there are many models that come to mind - Pre-apprenticeship, apprenticeships, and customized training.

#### Capacity within the Florida College & University Systems

- Colleges and universities have the capacity and the relationships and access to students of all ages – but we need to define those pathways and opportunities to entice the students in. We can also encourage individuals enrolled in other courses – like IT or Cyber – to consider a broadband credential or a no cost training.
- There is not currently a universal industry-recognized credential or credentials for broadband

workforce occupations. How can we work together to identify a credential or credentials that would meaningfully translate and create a pipeline of talent?

- If you look at Miami Dade College's nursing program, they complete the program and then get hired by an employer but must also make a two-year commitment. There is also a requirement that the college has several each class dedicated to managerial type positions.
- We need to create a funnel for broadband employers – in our partnership with manufacturing employers, we developed an easy-to-read chart to help students visual their pathway. (See attachment).

Florida should develop a prototype between MasTec and Miami Dade College. There are partners willing do this regionally and we are willing to share our curriculum to allow for quick replication across the state. MDC is currently doing this with their new AI learning center.

2.4.5 Text Box: The proposed subgrantee selection process is expected to demonstrate to subgrantees how to comply with all applicable Environmental and Historic Preservation (EHP) and Build America, Buy America Act (BABA) requirements for their respective project or projects. Describe how the Eligible Entity will communicate EHP and BABA requirements to prospective subgrantees, and how EHP and BABA requirements will be incorporated into the subgrantee selection process.

The Office of Broadband is committed to compliance with all applicable provisions of the Environmental Historic Preservation (EHP), the National Environmental Policy Act (NEPA), and Build America, Buy America Act (BABA) guidelines for BEAD projects and activities. The Office will mandate all subgrantees to demonstrate in their applications how they intend to comply with EHP and BABA requirements for all projects. An overview of the documentation related to the requirements below will be collected, reviewed, and submitted in the final proposal to the NTIA.

- Environmental Historic Preservation (EHP): Awarding agencies are required to analyze the potential environmental impacts, as required by the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). Projects or other eligible activities containing construction and/or ground-disturbing activities are required to submit all required environmental documentation to NTIA.
- National Environmental Policy Act (NEPA): NEPA requires agencies to evaluate and assess the environmental effects of any proposed actions before making further decisions. The Act was the first major environmental law in the United States, and agencies carrying out federal actions are required to comply.
- Build America, Buy America Act (BABA): The Build America, Buy America Act requires iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted. As guidance continues to evolve for BABA requirements and waivers, the Office will respond and plan accordingly to improve the outcomes for Florida households, businesses, and communities.

To facilitate compliance with the EHP, NEPA, and BABA, the Office will utilize a variety of strategies:

- Post EHP and BABA links and requirements on the Office of Broadband webpage.
- Publish webinars on the Office of Broadband webpage after the subgrantee application has been published.
- Use existing FloridaCommerce email account affiliated with the Office of Broadband to field any questions/inquiries about compliance.<sup>18</sup>

---

<sup>18</sup> The existing broadband email account is [Broadband@Commerce.fl.gov](mailto:Broadband@Commerce.fl.gov)

- Update the Office of Broadband webpage with videos with helpful information, such as definitions of terms or frequently asked questions.

2.4.6 Text Box: Describe how the Eligible Entity will define project areas from which they will solicit proposals from prospective subgrantees. If prospective subgrantees will be given the option to define alternative proposed project areas, describe the mechanism for de-conflicting overlapping proposals to allow for like-to-like comparisons of competing proposals.

The Office will define and post geographic areas in advance of opening the application cycle(s). Project areas will bundle unserved and underserved locations into packages available for bid to make them more attractive to applicants based upon return on investment (ROI) potential. While this is a departure from the approach the Office uses in the Broadband Opportunity and Capital Projects Fund Programs, defining the project areas in advance better supports the aims of the BEAD Program. Florida has sufficient funding to serve all unserved and underserved locations. The Office plans to support the prioritization of all unserved and underserved locations before engaging in other uses of BEAD funding.

The Office will utilize census tracts to create project areas. A combination of multiple census tracts may make up a project area so that the areas are large enough to avoid selective applications that avoid difficult-to-reach locations, but small enough to encourage small providers who may not have the operational reach to cover a large geographic space. Additional research is being conducted on estimated costs for coverage for varying project areas. It is expected that prospective subgrantees will provide service to all unserved and underserved locations within that area.

Proposals for a given project area will be all-or-nothing whereby providers will apply to cover an entire given project area. Applications for partial coverage will not be accepted, unless two or more providers collaborate in one or more applications to cover an entire given project area. To that end, providers submitting for multiple project areas will need to submit separate applications. As such, the deconfliction process will take place in the scoring of applications. Untangling overlapping bids will not be required.

To address applications that may need revisions due to decisions made on adjacent areas, Florida's deployment subgrantee selection process is structured to allow for iterative application rounds until all unserved and underserved broadband serviceable locations are claimed. Targeted ISP outreach is embedded in the plan and will focus on proximate providers. The Office is committed to transparency around ISP outreach and communication and has long recognized the importance of maintaining transparency in the state and upholds its belief that competition is an essential driver of the state's economy.

The borders of Florida's federally recognized tribes will also be accounted for in the creation of project areas. The Office intends for no non-Tribal project area to include locations on Tribal lands in part. In other words, project areas will either have 100% of locations on Tribal land or zero percent. Detail regarding allowable forms of Tribal consent is included below.

The state of Florida has two federally recognized tribes – the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida. The Office proposes the following steps so that projects on Tribal Lands receive consent from the appropriate Tribal Government:

1. In consultation with Florida's federally recognized tribes, when creating project areas, the Office will only create areas that are either (1) entirely on Tribal Lands, or (2) include no Tribal Lands. This will facilitate the ability for Florida's federally recognized tribes to serve solely their own Tribal Land, instead of defining project areas with partial coverage on Tribal lands,

should they choose to apply for this BEAD Program.

2. Applications submitted for project areas on Tribal Land will require proof of the Tribal Government's consent to be considered.

2.4.7 Text Box: If no proposals to serve a location or group of locations that are unserved, underserved, or a combination of both are received, describe how the Eligible Entity will engage with prospective subgrantees in subsequent funding rounds to find providers willing to expand their existing or proposed service areas or other actions that the Eligible Entity will take to ensure universal coverage.

If no proposals to serve a location or group of locations that are unserved, underserved, or a combination of both are received, the Office will engage in various activities to remedy this. While the Office will not offer inducements, other activities including targeted outreach to find providers willing to expand their existing or proposed service areas will occur, and are detailed below:

- Consider alternative technologies: During its application evaluation process, the Office will consider priority broadband projects first—those that provide service via end-to-end fiber-optic technology. However, to reach 100 percent connectivity, the Office will consider other technologies including fixed wireless and satellite solutions that are able to meet federal upload and download standards. If no location or group of locations receives proposals for fiber-optic service, the state will consider alternative technologies. The Office is committed to selecting technology that meets the BEAD NOFO definition of reliable broadband service, meaning broadband service that the Broadband DATA Maps show is accessible to a location via: (i) fiber-optic technology; (ii) Cable Modem/ Hybrid fiber-coaxial technology; (iii) digital subscriber line (DSL) technology; or (iv) terrestrial fixed wireless technology utilizing entirely licensed spectrum or using a hybrid of licensed and unlicensed spectrum. In the event that all Priority or Secondary applications meeting the definition of reliable broadband service for a location exceed the extremely high-cost threshold (EHCT) to a degree that would cause other locations to go unfunded, FloridaCommerce may consider the selection of an alternative technology, even if it may not meet the BEAD program's definition of reliable.
- Publish the unclaimed project areas: Following application rounds with no bid for project areas, the Office plans to announce the end of preliminary reviews and publish areas where there were no applications. Transparency has always been a key tenant of the Office's work in this space. This way, stakeholders across the state can be informed about the status of these areas.
- Outreach to location-adjacent providers: The Office will identify which providers are adjacent to the locations that did not receive a proposal for service. The Office will reach out to these providers to explore ways to expand the providers' service into the unserved/underserved location. Part of this outreach will involve a request for a cost estimate to extend broadband access to those unclaimed adjacent areas.

#### *Consideration for Potential Rural Digital Opportunity Fund (RDOF) Award Defaults*

Many of Florida's unserved and underserved rural communities are set to receive service from an ISP operating under an RDOF award from the FCC.<sup>19</sup> Under current program rules, BEAD funds cannot be utilized to deploy service to addresses already covered by those that are assigned through RDOF awards. However, there is growing local and national concern over the economic viability of some

---

<sup>19</sup> FCC Rural Digital Opportunity Fund Phase I Auction, Attachment A, <https://www.fcc.gov/auction/904>

RDOF awards coming to fruition. To ensure all Floridians have access to high-speed Internet at the conclusion of BEAD, potential approaches to using BEAD funding to cover any defaulted RDOF locations may be considered. One approach may be to request a waiver to allow BEAD funding to be used to serve RDOF addresses and reserving a significant portion of the BEAD funding; this approach would require an additional funding award round late in the BEAD process if the RDOF addresses are released from that program. Per NTIA, if a waiver is requested for RDOF areas, a formal waiver will need to be filed. The Office welcomes public comment and ideas on other approaches to address the uncertainty around RDOF defaults so that all Floridians will have access to high-speed Internet.

#### 2.4.8 Text Box: Describe how the Eligible Entity intends to submit proof of Tribal Governments' consent to deployment if planned projects include any locations on Tribal Lands.

The state of Florida has two federally recognized tribes – the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida. The Office proposes the following steps so that projects on Tribal Lands receive consent from the appropriate Tribal Government:

1. In consultation with Florida's federally recognized tribes, when creating project areas, the Office will only create areas that are either (1) entirely on Tribal Lands, or (2) include no Tribal Lands. This will facilitate the ability for Florida's federally recognized tribes to serve solely their own Tribal Land, instead of defining project areas with partial coverage on Tribal lands, should they choose to apply for this BEAD Program.
2. Applications submitted for project areas on Tribal Land will require proof of the Tribal Government's consent to be considered.

#### 2.4.9 Text Box: Identify or outline a detailed process for identifying an Extremely High Cost Per Location Threshold to be utilized during the subgrantee selection process. The explanation must include a description of any cost models used and the parameters of those cost models, including whether they consider only capital expenditures or include the operational costs for the lifespan of the network.

The extremely high-cost threshold (EHCT) is an important element of the subgrantee selection process. It will be used to determine subgrantee selection for grant applications for Priority Broadband Deployment Projects and Other Last-Mile Projects that cover the same project areas.

To develop and define the EHCT, the Office plans to collect information from the three sources listed below throughout the BEAD deployment subgrantee selection process.

1. Project costs from previous broadband grant programs in Florida

The Office has significant experience and data from previous broadband grant programs, including the Broadband Opportunity Program and Capital Project Fund (CPF). This inventory of past applications and awardees offers a window into the per passing costs in provider-defined projects. Though the Office is pursuing a different approach by defining the project areas in advance of the subgrantee selection process, this information is still useful in defining the EHCT for the BEAD Program.

2. Eligible Entity Planning Toolkit

The Office plans to explore the NTIA Eligible Entity Planning toolkit in the consideration of the EHCT. Specifically, the costing module will be used to better understand the effects of the EHCT on the future coverage of the state, and the expected cost of that coverage given the costing parameters outlined in the module.

3. BEAD deployment subgrantee applications

Details from the applications for project areas in Florida will enhance the Office's understanding of the costs and technologies providers are considering for the defined project bundles. The Office plans to leverage the details of the applications to inform the EHCT what works best in achieving the goals of FloridaCommerce and the BEAD Program. The Office is open to incorporating costing analyses from third-party firms, particularly those with a proven track record of broadband deployment modeling. These could further enhance the understanding of an EHCT for the state.

2.4.10 Text Box: Outline a plan for how the Extremely High Cost Per Location Threshold will be utilized in the subgrantee selection process to maximize the use of the best available technology while ensuring that the program can meet the prioritization and scoring requirements set forth in Section IV.B.6.b of the BEAD NOFO. The response must describe:

- a. The process for declining a subgrantee proposal that exceeds the threshold where an alternative technology is less expensive.
- b. The plan for engaging subgrantees to revise their proposals and ensure locations do not require a subsidy.
- c. The process for selecting a proposal that involves a less costly technology and may not meet the definition of Reliable Broadband.

The Office intends to use the EHCT to maximize the use with the best available technology while meeting the prioritization schema and scoring requirements outlined in Section IV.B.6.b of the BEAD NOFO. There are three main ways the EHCT will be used throughout the deployment subgrantee selection process.

#### 1. Decline a Subgrantee Proposal

The EHCT can be used to decline an application when a Priority Project proposal requests a BEAD subsidy that exceeds the EHCT. In this way, the EHCT can provide a reference point to decline applications that are costlier per passing than the EHCT allows. The Office will then consider non-priority applications received for that project area since no priority applications are considered cost effective given the identified EHCT.

#### 2. Revise a Subgrantee Proposal

As outlined in the application steps above, targeted outreach will be performed with each subsequent round of applications once there are applications available for all unclaimed locations. At this juncture, the EHCT will be defined, and last targeted outreach will take place as subgrantees are selected. The EHCT offers a benchmark to frame negotiations around cost per location for a project proposal. Revising proposals during a best and final offer process to make sure BEAD funds are used efficiently may be required. The Office is committed to transparency around ISP outreach and communication during this time. For ISP outreach concerning unclaimed locations, communications will be directed towards ISPs that currently cover adjacent areas and/or ISPs that have applied to cover project areas in contiguous locations. The Office recognizes the importance of maintaining transparency in the state and upholds its belief that competition is an essential driver of the state's economy.

#### 3. Select Proposals for Alternative Technologies

When the cost per location for all applications for a given project area is above the EHCT, the Office will consider alternative technologies to provide service to project areas. Because scoring criteria are outlined for both Priority and Other Last Mile broadband projects, the Office will use the EHCT to

benchmark proposals and better understand where alternative technologies should be considered to reach unserved and underserved locations. Because the EHCT is formally defined once all locations are covered through one or more applications, the Office will have full insight into the technologies that will connect previously unserved and underserved locations.

The Office is committed to selecting technology that meets the BEAD NOFO definition of reliable broadband service, meaning broadband service that the Broadband DATA Maps show is accessible to a location via: (i) fiber-optic technology; (ii) Cable Modem/ Hybrid fiber-coaxial technology; (iii) digital subscriber line (DSL) technology; or (iv) terrestrial fixed wireless technology utilizing entirely licensed spectrum or using a hybrid of licensed and unlicensed spectrum. In the event that all Priority or Secondary applications meeting the definition of reliable broadband service for a location exceed the EHCT to a degree that would cause other locations to go unfunded, FloridaCommerce may consider the selection of an alternative technology, even if it may not meet the BEAD program's definition of reliable.

2.4.11 Text Box: Describe how the Eligible Entity will ensure prospective subgrantees deploying network facilities meet the minimum qualifications for financial capability as outlined on pages 72- 73 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are qualified to meet the obligations associated with a Project, that prospective subgrantees will have available funds for all project costs that exceed the amount of the grant, and that prospective subgrantees will comply with all Program requirements, including service milestones. To the extent the Eligible Entity disburses funding to subgrantees only upon completion of the associated tasks, the Eligible Entity will require each prospective subgrantee to certify that it has and will continue to have sufficient financial resources to cover its eligible costs for the Project until such time as the Eligible Entity authorizes additional disbursements.
- b. Detail how the Eligible Entity plans to establish a model letter of credit substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF).
- c. Detail how the Eligible Entity will require prospective subgrantees to submit audited financial statements.
- d. Detail how the Eligible Entity will require prospective subgrantees to submit business plans and related analyses that substantiate the sustainability of the proposed project.

As part of the BEAD Program application, the Office of Broadband will require that prospective subgrantees submit the following to certify that they will meet the minimum qualifications for financial capability:

1. Audited financial statements and other documentation to demonstrate financial standing (which may include SEC filings, or financial records of a parent company along with clear documentation establishing that corporate relationship). The audited financial must be from the previous year and audited by an independent certified

accountant.

2. Clear identification of additional funding sources and proof of financing availability.
3. Detailed financial statements (cash flow, balance sheet, income statement) for project period (deployment and operational sustainability) – enables review of capital deployment stage and recurring revenue and operating expenditures.
4. Degree to which the applicant demonstrates the ability to obligate and spend funds in compliance with the program deadlines on previous projects
5. Detailed narrative explaining how the grant recipient will obligate and spend funds in compliance with the program deadlines
6. Key metrics regarding financial targets required by non-state fund contributors and how the business plan achieves those objectives
7. Discussion of key financial risks that could impede sustainability (e.g., revenue shortfalls, cost overruns) and mitigation strategy
8. Discussion of plans to promote supply-chain, available materials and workforce, and project resiliency
9. A model letter of credit from an eligible bank (see 47 C.F.R. § 54.804(c)(2)) in which the bank commits to issuing an irrevocable standby letter of credit to the applicant. Letter of Credit (LOC) requirements may be conditionally waived in circumstances where the LOC will prohibit a provider to participate in the program and one of the four paths for a conditional programmatic waiver is viable for a BEAD participant (i.e., Subgrantee Option to Use Credit Unions, Subgrantee Option to Use Performance Bonds, Reduction of LOC/Performance Bonds Upon Completion of Milestones, and Subgrantee Option for Alternative Initial LOC or Performance Bond Percentage).<sup>20</sup> The Office wants to encourage participation by a wide range of providers to encourage competition and best value service for unserved and underserved areas.
10. Verified financial commitments from community members and organizations.

The Office will also require prospective subgrantees to submit business plans and related analyses demonstrating each proposed project's sustainability. These can be provided as pro forma statements or analyses that include current cash flow and balance sheet projections, and at least three years of operating costs and cash flow projections after the project's targeted completion. The business plan and related analyses may include, but are not limited to, the following elements:

- A marketing plan to stimulate and retain subscriptions.
- Pricing plans that commit to not raising rates that exceed the Consumer Price Index for All Urban Consumers (CPI-U) for at least five years from the date of infrastructure deployment.
- A customer service plan ensuring qualified broadband service installation.
- A customer service plan ensuring the repair of qualified broadband service.
- A customer complaint process ensuring reasonable response time and resolution within 30 days, unless a more extended period is mutually agreed upon with the subscriber.
- Network monitoring and outage reporting procedures, including public transparency.
- Staffing of personnel to support network and customer operational sustainability after construction.

---

<sup>20</sup> BEAD Letter of Credit Waiver, BroadbandUSA. Accessed on November 6, 2023 at <https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD-Letter-of-Credit-Waiver>



- Location(s) of field personnel involved in installation and repair of the proposed project network and estimated “windshield” time – the time technicians spend traveling to and from sites – for response (to demonstrate adequate operational support).
- A business continuity and disaster recovery plan for the project area.
- Redundancy, diversity, and fault points of the proposed project network.
- Use of shared infrastructure owned or controlled by a third party.
- The network technology to be deployed and its long-term stability indicated by possible capital investments required within five years – if required, the engineering plan, procurement process, and evidence of funding must be included.
- Consumer support plans for sustainable digital equity, training, and technical support.
- Network standards employed to determine augments or expansion of middle mile, lateral, or backhaul facilities for network congestion and the ability to expand.

The Office will require subgrantees to complete a post-construction business operations budget for the five years following the end of construction. The business operations budget must include revenues based on subscription and pricing, including subsidies to all locations in the project area, direct cost of operations, and administrative and selling costs in a financial statement pro forma, including depreciation of the subgrantee match. The budget submitted will be measured against semiannual reporting post-completion of the project.

Once an award has been made and project work commences, the Office intends to disburse funding to subgrantees only upon completion of subrecipient agreement established milestones. The Office will require each prospective subgrantee to certify that it is qualified to meet the obligations associated with a project, that it will have available funds for all project costs that exceed the amount of the grant, and that it will comply with all program requirements, including service milestones. Prospective subgrantees must have and will continue to have sufficient financial resources to cover eligible costs for the project until the Office authorizes additional disbursements. The Office will monitor grantees to determine compliance with the financial requirements of 2 C.F.R. Part 200, including 2 C.F.R. Parts 200.300-309 and 2 C.F.R. Parts 200.328-330. Typically, ledgers, invoices, canceled checks, bank statements, and requisitions are reviewed to see whether the subrecipient has an adequate system of financial management. Office of Broadband staff may also make specific requests to review information or documentation relating to the financial management of a grant. As further described in Section 2.4.1., a rural community or rural area of opportunity, as those terms are defined in section 288.0656(2), Florida Statutes, may receive payment for costs under its grant agreement with FloridaCommerce for “verified and eligible performance that has been completed in accordance with the terms and conditions set forth in the agreement.”

While the BEAD NOFO requires prospective subgrantees obtain a letter of credit, recent updated guidance provided from the NTIA permits a waiver for certain circumstances, including the subgrantee option to use credit unions, performance bonds, an alternative LOC or performance bond percentage, or a reduction of LOC/performance bonds upon completion of milestones.<sup>21</sup> When the standard letter of requirement will preclude a participant and one of the four aforementioned options will allow participation, the Office will consider waiving the letter of credit for one of the alternatives. The Office reserves the option to explore a waiver for

---

<sup>21</sup> BEAD Letter of Credit Waiver, BroadbandUSA. Accessed on November 6, 2023 at <https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD-Letter-of-Credit-Waiver>

this requirement if the letter of credit model proves unviable for Florida's broadband ecosystem. This requirement can present an obstacle for many of the providers and may preclude prospective subgrantees from participating in the process to obtain BEAD funding. Because the Office already has robust checks on financial viability as part of its Broadband Opportunity Program, many of these requirements can be followed here as well.

The BEAD Program scoring rubric will allocate points for the requirements listed above when assessing each project's financial viability and sustainability.

2.4.11.1 Optional Attachment: As an optional attachment, submit application materials related to the BEAD subgrantee selection process, such as drafts of the Requests for Proposals for deployment projects, and narrative to crosswalk against requirements in the Deployment Subgrantee Qualifications section.

Not applicable.

2.4.12 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for managerial capability as outlined on pages 73 – 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to submit resumes for key management personnel.
- b. Detail how it will require prospective subgrantees to provide a narrative describing their readiness to manage their proposed project and ongoing services provided.

The Office of Broadband will require that all prospective subgrantees deploying network facilities meet the qualifications for managerial capability as listed in the BEAD NOFO. This will be confirmed via the submission of resumes and a narrative, both of which will be considered in the scoring of prospective subgrantees.

Prospective subgrantees will be required to submit resumes for all key management personnel and other relevant positions. Organizational charts should also be included, detailing all parents, subsidiaries, and affiliates of the prospective subgrantee.

In addition, prospective subgrantees will be required to provide a narrative describing their readiness to manage their proposed project and its ongoing services. This narrative should include the subgrantee's experience and qualifications of key management personnel, its experience undertaking projects of similar size and scope, recent and upcoming organizational changes including mergers and acquisitions, and relevant organizational policies.

2.4.13 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for technical capability as outlined on page 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are technically qualified to complete and operate the Project and that they are capable of carrying out the funded activities in a competent manner, including that they will use an appropriately skilled and credentialed workforce.

b. Detail how the Eligible Entity will require prospective subgrantees to 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.

To confirm that prospective subgrantees deploying network facilities meet the minimum qualifications for technical capability as outlined on page 74 of the BEAD NOFO, require the following in the BEAD Program application:

1. Technical qualifications: Prospective subgrantees will be required to submit details regarding experience and results in having deployed similar networks, details regarding key personnel, including resumes and relevant certifications, and identification of key partners, roles, and letters of project commitment. Prospective subgrantees will also be required to certify that they are technically qualified to complete and operate a project and that they can carry out funded activities competently, which requires the use of an appropriately skilled and credentialed workforce.
2. Project Schedule: Prospective subgrantees will be required to submit a project schedule in the format determined and outlined in the BEAD Program application that is detailed, structured, clear, and evidences a complete build-out and the initiation of service within four years of the date on which the subgrantee receives the subgrant; a detailed narrative on the project schedule; and identification of key execution risks and a mitigation plan. Prospective subgrantees must also submit project costs and timelines. Submissions must detail schedules that cover initial planning to complete build-out and initiation of service within four years of the subgrant receipt. Speed to deployment will also be a material term of the subgrantee contract to make sure proposed timelines are met.
3. Engineering Design and Network Map: Prospective subgrantees will be required to submit a clear, detailed network route map that is consistent with route miles; technology specifications that clearly indicate purported speeds and network indicators can be met; and vendor details (particularly for new technologies or new applications of technology). Additionally, certification by a professional engineer is required (i.e., Professional Engineer, Society of Cable Telecommunications Engineers, or similar certification is required).

The BEAD Program scoring rubric will allocate points for the requirements listed above when assessing each project's organizational capability and track record, as well as its project readiness.

2.4.14 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for compliance with applicable laws as outlined on page 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to demonstrate that they are capable of carrying out funded activities in a competent manner in compliance with all applicable federal, state, territorial, and local laws.
- b. Detail how the Eligible Entity will require prospective subgrantees to permit workers to create worker-led health and safety committees that management will meet with upon reasonable request.

The Office intends that all prospective subgrantees meet the minimum qualifications for compliance with applicable laws as outlined in the BEAD NOFO. Prospective subgrantees will be required to explicitly confirm their commitment to these laws as part of the application process; subgrantees that fail to demonstrate their ability to comply will not be considered.

As part of the application, prospective subgrantees will be required to provide a narrative demonstrating their ability and intent to carry out funded activities in a competent manner, in compliance with all applicable federal, state, territorial, and local laws.

As part of this narrative, the Office will require confirmation that prospective subgrantees will permit workers to create worker-led health and safety committees that management will meet with upon reasonable request. This must include details on any policies and procedures that promote occupational safety and health requirements. Additional resources may be made available to prospective subgrantees to support occupational safety and health compliance.

2.4.15 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for operational capability as outlined on pages 74 – 75 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they possess the operational capability to qualify to complete and operate the Project.
- b. Detail how the Eligible Entity will require prospective subgrantees to submit a certification that have provided a voice, broadband, and/or electric transmission or distribution service for at least two (2) consecutive years prior to the date of its application submission or that it is a wholly owned subsidiary of such an entity, attests to and specify the number of years the prospective subgrantee or its parent company has been operating.
- c. Detail how the Eligible Entity will require prospective subgrantees that have provided a voice and/or broadband service, to certify that it has timely filed Commission Form 477s and the Broadband DATA Act submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations.
- d. Detail how the Eligible Entity will require prospective subgrantees that have operated only an electric transmission or distribution service, to submit qualified operating or financial reports, that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.
- e. In reference to new entrants to the broadband market, detail how the Eligible Entity will require prospective subgrantees to provide evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities.

The Office will require that prospective subgrantees certify their ability to complete and operate BEAD funded projects. Prospective subgrantees deploying network facilities must meet the minimum

qualifications for operational capability as outlined on pages 74 – 75 of the BEAD NOFO. The Office will evaluate whether a prospective subgrantee is qualified for the proposed project by considering operational capability.

To demonstrate this, as part of the application, the prospective subgrantee will be required to provide:

- A certification that prospective subgrantees possess the operational capability to qualify to complete and operate the project.
- If the prospective subgrantee has provided a voice, broadband, and/or electric transmission or distribution service for at least two consecutive years prior to the date of its application submission or is a wholly owned subsidiary of such an entity, an attestation specifying the number of years the prospective subgrantee or its parent company has been operating.
- Certification the prospective subgrantee timely filed Commission Form 477s and the Broadband DATA Act submission if they have provided a voice and/or broadband service, as required during this time period, and otherwise has complied with the Commission's rules and regulations
- If the prospective subgrantee has only operated an electric transmission or distribution service, qualified operating or financial reports that it has filed with the relevant financial institution for the relevant time period, and a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.
- If the prospective subgrantee is a new entrant to the broadband market, a narrative and supporting evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities. This may include details on training programs and curricula, detailed resumes of key personnel, or project descriptions from partners with relevant operational experience.

Further, an organization's capability and track record will be included as part of the scoring criteria for determining awardees. More details on the scoring criteria can be found in Section 2.4.2.

2.4.16 Text Box: Describe how the Eligible Entity will ensure that any prospective subgrantee deploying network facilities meets the minimum qualifications for providing information on ownership as outlined on page 75 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to provide ownership information consistent with the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7).

The Office will require that prospective subgrantees submit evidence of their ability to deploy network facilities that meet the minimum qualifications for providing information on ownership as outlined on page 75 of the BEAD NOFO. Prospective subgrantees will be required to submit ownership information as part of their applications pursuant to the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7).<sup>22</sup> Prospective subgrantees must fully disclose the following as part of their applications:

- List the real party or parties in interest in the applicant or application, including a complete disclosure of the identity and relationship of those persons or entities directly or indirectly owning or controlling (or both) the applicant.
- List the name, address, and citizenship of any party holding 10 percent or more of stock

---

<sup>22</sup> Ownership disclosure requirements for applications, Code of Federal Regulations. Accessed on October 30, 2023 at: <https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-Q/subject-group-ECFR7e6f5a3219dc9cd/section-1.2112>.

in the applicant, whether voting or nonvoting, common or preferred, including the specific amount of the interest or percentage held.

- List, in the case of a limited partnership, the name, address and citizenship of each limited partner whose interest in the applicant is 10 percent or greater (as calculated according to the percentage of equity paid in or the percentage of distribution of profits and losses).
- List, in the case of a general partnership, the name, address and citizenship of each partner, and the share or interest participation in the partnership.
- List, in the case of a limited liability company, the name, address, and citizenship of each of its members whose interest in the applicant is 10 percent or greater.
- List all parties holding indirect ownership interests in the applicant as determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain, that equals 10 percent or more of the applicant, except that if the ownership percentage for an interest in any link in the chain exceeds 50 percent or represents actual control, it shall be treated and reported as if it were a 100 percent interest.
- List any FCC-regulated entity or applicant for an FCC license, in which the applicant or any of the parties identified in [paragraphs \(a\)\(1\)](#) through [\(a\)\(5\)](#) of this section, owns 10 percent or more of stock, whether voting or nonvoting, common or preferred. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the applicant (e.g., Company A owns 10 percent of Company B (the applicant) and 10 percent of Company C, then Companies A and C must be listed on Company B's application, where C is an FCC licensee and/or license applicant).

**2.4.17 Text Box:** Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for providing information on other public funding as outlined on pages 75 – 76 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity may reference those to outline alignment with requirements for this section. The response must:

a. Detail how it will require prospective subgrantees to disclose for itself and for its affiliates, any application the subgrantee or its affiliates have submitted or plan to submit, and every broadband deployment project that the subgrantee or its affiliates are undertaking or have committed to undertake at the time of the application using public funds.

b. At a minimum, the Eligible Entity shall require the disclosure, for each broadband deployment project, of: (a) the speed and latency of the broadband service to be provided (as measured and/or reported under the applicable rules), (b) the geographic area to be covered, (c) the number of unserved and underserved locations committed to serve (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage), (d) the amount of public funding to be used, (e) the cost of service to the consumer, and (f) the matching commitment, if any, provided by the subgrantee or its affiliates.

The Office will require that the prospective subgrantee disclose any existing broadband projects that use public funds. The following will be required as part of the application:

- A list of all broadband deployment projects that the subgrantee or its affiliates are undertaking or have committed to undertake at the time of the application using public funds

- For each broadband deployment project, the following components must also be submitted:
  - The speed and latency of the broadband service to be provided (as measured and/or reported under the applicable rules).
  - The geographic area to be covered.
  - The number of unserved and underserved locations committed to serve (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage).
  - The amount of public funding to be used.
  - The cost of service to the consumer.
  - The matching commitment, if any, provided by the subgrantee or its affiliates.

## 2.5 Non-Deployment Subgrantee Selection (Requirement 9)

---

2.5.1 Text Box: Describe a fair, open, and competitive subgrantee selection process for eligible non-deployment activities. Responses must include the objective means, or process by which objective means will be developed, for selecting subgrantees for eligible non-deployment activities. If the Eligible Entity does not intend to subgrant for non-deployment activities, indicate such.

Currently, the state of Florida estimates it may have approximately \$200 million remaining after connecting all remaining locations. The exact amount of remaining funds will hinge upon the outcomes of the deployment subgrantee selection process. Through conversations with providers and other stakeholders, achieving access goals will only be possible if Florida's broadband-related workforce is scaled up to meet the needs of building out communities' access to broadband.

Therefore, the state plans to conduct a subgrantee selection process in parallel to the deployment subgrantee selection process that will prioritize workforce development initiatives. Other non-deployment activities like cybersecurity are also being considered for this funding.

As outlined in Section 2.4, much of the selection process for non-deployment activities will focus on training, developing, and up-skilling Florida's broadband-related workforce. Through conversations with workforce stakeholders, the workforce needs of the state have been more thoroughly explored. Through these discussions, the Office has identified a need for pathways to employment and apprenticeship and pre-apprenticeship offerings. Additionally, conversations identified a need for marketing aimed at increasing awareness of job training opportunities for broadband-related professionals. As such, the Office plans to conduct a non-deployment subgrantee selection process that centers around addressing these identified workforce gaps.

The state is committed to holding a fair, open, and competitive selection process for prospective subgrantees. Below is a description of Florida's proposed process to establish completely neutral selection criteria:

**Public Notice:** The Office will issue an application for non-deployment subgrantee funding. The application for eligible non-deployment activities will be published through multiple channels such as the program website and social media. The public notice announcement will include information about the application process, eligibility criteria and evaluation criteria. The notice will be made available prior to the application opening.

**Technical Assistance:** The Office will hold at least one webinar prior to the application deadline to respond to questions from potential applicants and to provide guidance on how to complete the application.

**Evaluation Criteria:** The Office will develop objective evaluation criteria to assess the applications. Criteria will be established in advance and communicated to all potential applicants. Examples of evaluation criteria may include questions related to:

- A narrative describing how the applicant's project can meet the NOFO objectives
- A description of the approach and methodology for data collection and data management
- Demonstration of measurable outcomes
- A work plan demonstrating the applicant's capacity to implement the project
- A clear budget with proposed cost justifications



**Review Panel:** The Office will convene a review panel comprising subject matter experts and relevant state agency representatives. Reviewers will need to have the necessary expertise to evaluate the applications based on the evaluation criteria. Reviewers will also need to disclose any conflicts of interest that may arise from their participation and recuse themselves if necessary.

**Evaluation Process:** Applications will go through an initial screening process to completion before they are forwarded to the review team. The review team will review and evaluate each application based on the established criteria. A score with justification will need to be provided for each of the evaluation categories. After all applications have been evaluated, all reviewers will convene to discuss outcomes. A scoring rubric or qualitative assessment may be used to ensure consistency and objectivity in the evaluation process. The evaluation process will be documented through a variety of methods and reviewed by the Office of Broadband's leadership before the awardees are announced.

The Office will take the necessary steps to prevent bias, collusion, arbitrary decisions, and any other factors that could undermine the evaluation process. To adhere to these principles, FloridaCommerce has established safeguards against collusion, bias, conflicts, and arbitrary decisions, as detailed below.

Collusion: The Office of Broadband is committed to developing a subgrantee selection process that aims to prevent collusion and anti-competitive practices, including bid suppression, complementary bidding, bid rotation, and/or market allocation. The Office will aim to discourage anti-competitive behavior by adopting the following practices:

- develop an expanded list of prospective subgrantees;
- require prospective subgrantees to sign and submit a non-collusion affidavit;
- maintain procurement records e.g., bid lists, awards, applications; and
- request further information with concerning prices when further clarification is needed.

These preventative measures, along with others, will allow the Office to disincentivize anti-competitive behavior and prevent illegal practices. This will also encourage competitive pricing that will maximize the efficacy, reach, and impact of BEAD funds.

Bias: To avoid bias in decision-making and the subgrantee selection process, applications will be evaluated by an established scoring criteria and point system outlined in Section 2.5. This point system aims to score applications on a level playing field and on a quantitative basis. The selection criteria will help verify that subgrantees and their projects conform to objective standards set by the Office of Broadband.

Conflicts: To discourage conflicts of interest, subgrantee selections will be made by a diverse group of decision-makers who are impartial. Ethical standards will be followed and applied to all decision-making, which will include selection through the lens of honesty, fairness, accountability, objectivity, and confidentiality. Additionally, any existing relationships and potential conflicts of interest will require disclosure at the onset of the selection process.

Arbitrary Decisions: To avoid arbitrary decisions, the Office of Broadband will make fair choices based on the establishment of competitively neutral selection criteria. Reviewers will receive guidance and training to create objective standards of review. Selections will not be made based on personal will and discretion.

If any misconduct is identified, the Office will work with the state Attorney General's office to ensure

appropriate actions are taken, issues are mitigated, and any awarded funds are rescinded.

**Transparency:** The subgrantee selection process will include clear communication throughout to applicants and the public. The Office of Broadband will publish a list of selected subgrantees on its website, along with a summary of the evaluation process.

Adjustments will be made to the subgrantee selection process as necessary to meet NTIA requirements for a fair, open, and competitive subgrantee selection process for non-deployment activities under the BEAD program. The Office of Broadband will review previous grant program application processes and apply lessons learned to finalize evaluation criteria and refine the evaluation process. The Office will encourage participation from a wide variety of applicants by working with community anchor institutions, tribal and state agency partners, and other stakeholder groups to publicize the availability of funding across the state.

#### 2.5.2 Text Box: Describe the Eligible Entity's plan for the following:

- a. How the Eligible Entity will employ preferences in selecting the type of non-deployment initiatives it intends to support using BEAD Program funds;
- b. How the non-deployment initiatives will address the needs of residents within the jurisdiction;
- c. The ways in which engagement with localities and stakeholders will inform the selection of eligible non-deployment activities;
- d. How the Eligible Entity will determine whether other uses of the funds might be more effective in achieving the BEAD Program's equity, access, and deployment goals.

To distribute funding for non-deployment initiatives, the Office will issue an open-ended application for potential workforce development opportunities. The state's approach for funding non-deployment initiatives will prioritize those that align with, and advance, goals related to up-skilling or re-skilling the broadband workforce.

Informed by continuous engagement with stakeholders, the Office aims to be a strong catalyst in the development of a sufficient and sustainable supply of a highly skilled broadband workforce. This initiative will address the urgent need for more skilled workers in broadband-related fields. The decision is also based on a core contingency: for there to be reliable and ongoing service to eligible CAIs, there must be a sufficient talent pipeline to supply, operate, and maintain this service. Local coordination is a key focus for the Office, and it has already revealed the importance of additional focus on workforce development. The intersection of workforce development and BEAD efforts were a clear focal point during the robust stakeholder engagement the Office conducted. Florida's local coordination made clear a well-trained workforce was key to initial broadband deployment and would provide a long-term benefit to connecting unserved and underserved communities, unlocking the capacity for online training opportunities. Continued engagement can help to uncover the full scale of this need, which has been expressed by many stakeholders and voices throughout Florida.

Workforce development is a large and multi-faceted economic priority for Florida. Providers cannot recruit, hire, and train the massive workforce required without strategic collaboration among the public and private sectors. To achieve 100 percent connectivity in the state, and maintain and operate the four hundred thousand newly connected locations and thousands of miles of newly deployed fiber technology, the Office must proactively and expediently work with its partners, including the Florida College System, technical and career centers, CareerSource Florida, and local

workforce development boards, to identify strategies and programming that help promote the sustainable development and growth of a highly skilled workforce.

Thankfully, the Office has and will continue to tap into the expertise and programmatic insights of the nation's number one network of talent development training partners,<sup>23</sup> including thought leaders like Miami Dade College, CareerSource South Florida, the Florida Chamber of Commerce and the Florida Department of Education. Each of these partners have a strong track record of connecting emerging, high demand, and scalable workforce pathways with members of a growing workforce who have either previously faced barriers to high quality workforce training, or members of the workforce who are seeking the opportunity to upskill. Moreover, all of these partners have a proven track record of microtargeting their outreach to prospective students and trainees to communities where skills' gaps can benefit greatly by the significant injection of resources that the BEAD funding offers.

Broadly speaking, workforce initiatives that the Office will fund will encompass the following categories:

- **Support Services:** Service offerings that help individuals transition into and enter the broadband workforce. These offerings can also support workers' ability to access and complete training;
- **Apprenticeship and Pre-Apprenticeship Programs:** Apprenticeship and pre-apprenticeship offerings that prepare a pipeline of workers for broadband jobs;
- **Training and Formal Degree Offerings:** Informal training and formal degree offerings, particularly as they relate to entry-level roles, and management, supervisor, a foreman positions;
- **Pathway Programs:** Initiatives that aim to define the various pathways to pursue a career in broadband and successfully support on-ramps to broadband jobs; and
- **Marketing Initiatives:** Initiatives that aim to increase awareness surrounding job training opportunities for broadband-related professions and initiatives that intend to increase awareness of high-quality broadband occupations.

The Office's scoring or relative prioritization of proposed non-deployment initiatives will be based on the following:

- **Minimal BEAD Program Funding:** The total BEAD funding that is requested for the project;
- **Alignment with Workforce Objectives:** Demonstrated ability of the proposed initiative to successfully advance or impact workforce priorities, as articulated within the Workforce Plan;
- **Partnerships and Collaboration:** The ability to leverage existing partnerships with other institutions that play a role within the workforce ecosystem or establish new relationships with applicable organizations;
- **Sustainability of Initiative:** The capacity for the initiative to be sustained after BEAD funds have been spent; and
- **Magnitude of Impact:** The potential of the proposed initiative to impact the broadband workforce, as defined by the estimated economic and workforce impacts.

Alignment with workforce objectives is a priority for the state, and to best achieve this, Office will continually assess the success of non-deployment activities and will refine the use of non-deployment

---

<sup>23</sup> Florida Ranked #1 by Lightcast for Attracting and Developing a Skilled Workforce for Second Year in a Row, <https://www.flgov.com/2023/12/08/florida-ranked-1-by-lightcast-for-attracting-and-developing-a-skilled-workforce-for-second-year-in-a-row/>

funding. In doing so, the state can determine the most effective ways to achieve the BEAD Program's goals and adjust course as needed.

### 2.5.3 Text Box: Describe the Eligible Entity's plan to ensure coverage to all unserved and underserved locations prior to allocating funding to non-deployment activities.

The Office proposes to simultaneously dedicate a portion of BEAD funds for training and workforce initiatives in lieu of deployment, as achieving access goals will only be possible if Florida's broadband-related workforce is scaled up to meet the needs of building out communities' access to broadband at acceptable speeds. This approach of simultaneously selecting subgrantees for workforce-related initiatives will be imperative to expand coverage to remaining unserved and underserved locations. Without the proposed upskilling opportunities, Florida may encounter workforce shortages that hinder its ability to serve remaining locations. As such, workforce development initiatives cannot represent an afterthought, but rather must be a focus for the State to successfully achieve universal coverage. As the Office conducts subgrantee selection for deployment and non-deployment initiatives, it will make determinations related to final awardees based on the proposed initiatives and projects that maximize the impact of BEAD funds. This will be defined by the ability to prepare the broadband workforce for deployment projects and the capacity to serve remaining locations.

The Office has been mapping award locations for the Broadband Opportunity Program and the Capital Projects Fund – Infrastructure Program, along with existing federal commitments, and awards, private investment builds, and local community projects to accurately identify the remaining BEAD eligible locations. Build costs have been analyzed to determine estimates of future deployment and have combined remaining BEAD eligible locations with known costs to determine the funds remaining after all eligible locations have been served. We have determined that sufficient funds will remain for workforce initiatives, cybersecurity training, line extensions, legal and media assistance, and funds to deploy broadband to some defaulted Rural Digital Opportunity Fund locations.

### 2.5.4 Text Box: Describe how the Eligible Entity will ensure prospective subgrantees meet the general qualifications outlined on pages 71 – 72 of the NOFO.

The Office will apply a similar process to the non-deployment subgrantee process as what was outlined for the deployment subgrantee selection process. This will verify that prospective subgrantees can meet the general qualifications required in the BEAD NOFO. Before entering any subgrantee agreement, the Office will verify that the subgrantee can:

- Competently carry out activities funded by the subgrant in compliance with all applicable federal, Florida State, and local laws.
- Demonstrate financial and managerial capacity to meet the commitments of the subgrantee under the subgrant, the requirements of the program and such other requirements as have been prescribed by the Assistant Secretary or the Office of Broadband.
- Demonstrate the technical and operational capability to provide the services promised in the subgrant in the manner contemplated by the subgrant award.

To demonstrate financial capacity, the Office will also require potential subgrantees to certify that they are financially qualified to meet the obligations associated with a project, that they will have available funds for all project costs that exceed the grant amount, and that they will comply with all program requirements, including service milestones. The Office will disburse funding to subgrantees only upon completion of the associated tasks. Each applicant must also certify that it has and will continue to

have sufficient financial resources to cover its eligible project costs until the Office authorizes additional disbursements. The Office will follow federal and state requirements for disbursements of funds.

Additionally, potential subgrantees must submit a work plan with a narrative describing how they can meet project objectives. They will also need to submit responses to questions that support evidence of the three items mentioned above in addition to supporting documentation, which may include:

- A description of previous successful compliance experience with federal, state, or local requirements related to grant implementation. Potential subgrantees must include a statement as to whether they have been subject to any enforcement actions related to past projects. For applicants who have not previously been awarded grant funding, a description of how they intend to comply with all applicable laws will be acceptable.
- A certification to the Office that they are technically qualified to complete and operate their proposed project(s) and capable of carrying out the funded activities competently.
- Financial reports.
- Resumes of key managerial staff and organizational charts.

## 2.6 Eligible Entity Implementation Activities (Requirement 10)

---

2.6.1 Text Box: Describe any initiatives the Eligible Entity proposes to implement as the recipient without making a subgrant, and why it proposes that approach.

The Office maintains a strong track record of managing deployment grants, including all the associated processes, with a focus on fairness, transparency, and timeliness. The results of these efforts are documented in the ConnectedFlorida map which outlines project areas submitted in applications and subsequent awards.<sup>24</sup>

The Office intends to establish and conduct key oversight, administrative, and implementation activities related to BEAD subgrants. These activities include but are not limited to:

- Challenge process design and implementation
- Stakeholder engagement throughout the BEAD Program period
- Coordination of LTPTs through monthly and ad-hoc meetings
- Subgrantee selection process
- Grant award and management process
- Ongoing subgrant monitoring activities
- Ongoing data collection and mapping throughout the BEAD Program period
- Workforce initiatives to improve readiness for BEAD Program
- Training and apprenticeship expansion opportunities
- Coordination with digital capacity grants and other digital adoption and use initiatives

Connecting unserved and underserved communities through BEAD deployment and the facilitation of a fair, timely and transparent program remains the focus of the Office. The Office will work with FloridaCommerce's Division of Workforce Services to support the development of the workforce to carry out deployment efforts. As NTIA releases additional and updated guidance that affect those activities, the oversight, administrative, and implementation efforts of the Office of Broadband will be refined.

The Office has a proven track record of managing a successful grants program and has the administrative capabilities and knowledge to implement required BEAD activities. Working within the legislative directives that helped establish the Office of Broadband, the Office sees the BEAD Program as an opportunity to enhance and expand an existing set of activities to support a connected economy in Florida.

---

<sup>24</sup> ConnectedFlorida Map, <https://experience.arcgis.com/experience/54d3be208bae4eacad7303b50347de78>

## 2.7 Labor Standards and Protection (Requirement 11)

---

2.7.1 Text Box: Describe the specific information that prospective subgrantees will be required to provide in their applications and how the Eligible Entity will weigh that information in its competitive subgrantee selection processes. Information from prospective subgrantees must demonstrate the following and must include information about contractors and subcontractors:

- a. Prospective subgrantees' record of past compliance with federal labor and employment laws, which:
  - i. Must address information on these entities' compliance with federal labor and employment laws on broadband deployment projects in the last three years;
  - ii. Should include a certification from an Officer/Director-level employee (or equivalent) of the prospective subgrantee evidencing consistent past compliance with federal labor and employment laws by the subgrantee, as well as all contractors and subcontractors; and
  - iii. Should include written confirmation that the prospective subgrantee discloses any instances in which it or its contractors or subcontractors have been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.
- b. Prospective subgrantees' plans for ensuring compliance with federal labor and employment laws, which must address the following:
  - i. How the prospective subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:
    1. Information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network; and
    2. How the subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

Prospective subgrantees will be required to provide information documenting past compliance with federal labor and employment laws. FloridaCommerce recognizes the importance of compliance with such laws, and as such, compliance must be followed across all levels, including by potential subgrantees, their contractors, and their subcontractors. The full detail on scoring for labor standards and protection is detailed further in Section 2.4. As a summary, prospective subgrantees must provide a narrative and evidence of plans to comply with federal labor and employment laws, disclosure of prospective subgrantee violations, disclosure of contractor and/or subcontractor violations, wage information, and the provision of workplace safety committees. Each one of these categories is weighted six possible points. For new market entrants, prospective subgrantees must submit plans to ensure compliance with federal and state labor and employment laws. These plans must address how the applicant will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors.

The state will implement monitoring procedures upon the selection of subgrantees to maintain compliance during buildout. As part of their applications, prospective subgrantees must submit the following:

- Records of past compliance with federal labor and employment laws. This includes documentation of compliance with such laws for broadband deployment projects in the last three years.
- Certification from an Officer/Director-level employee (or equivalent) of the prospective subgrantee evidencing consistent past compliance with federal labor and employment laws by the subgrantee, as well as all contractors and subcontractors.
- Written confirmation of violation disclosure where either contractors or subcontractors have been found to have violated laws such as the Occupational Safety and Health Act (OSHA), the Fair Labor Standards Act (FLSA), or any other applicable labor and employment laws for the preceding three years.
- Information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network.
- Language describing plans for the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

In line with labor standards used for Broadband Opportunity Program Funds in Florida, the Office will also require compliance with the following federal labor standards, including but not limited to:

1. While not specifically required under this program, the Davis-Bacon Act of 1931, as amended (40 U.S.C. 3141-3148) will be required for the program if leveraged funding sources require adherence.
2. Labor Standards Provisions of 29 C.F.R. Part 5
3. Contract Work Hours and Safety Standards Act of 1962, as amended (40 U.S.C. 3701-3708)
4. Federal Fair Labor Standards Act of 1938, as amended (29 U.S.C. 201-219)
5. Copeland "Anti-Kickback" Act (18 U.S.C. 874)

In addition to the above requirements, prospective subgrantees must comply with the following, including but not limited to:

1. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. Part 200) in general, other than the excluded requirements outlined in Assistance Listing Number 21.027
2. The Hatch Act (5 U.S.C. 1501-1508 and 7324-7328)
3. Governmentwide Requirements for Drug-Free Workplace (31 C.F.R. Part 20)
4. New Restrictions on Lobbying (31 C.F.R. Part 21)
5. Protections for Whistleblowers (41 U.S.C. 4712)
6. False Claims Act (31 U.S.C. 3729-3733)
7. Uniform Relocation Assistance and Property Acquisitions Act of 1970 (42 U.S.C. 4601-4655)
8. Rules and Procedures for Efficient Federal-State Funds Transfers (31 C.F.R. Part 205)
9. Florida Small and Minority Business Assistance Act (288.703-706, Florida Statutes)
10. Single Audit Act Amendments of 1996 (31 U.S.C. 7501-7507)

The Office of Broadband reserves the right to modify guidance as needed.

[2.7.2 Text Box: Describe in detail whether the Eligible Entity will make mandatory for all](#)



subgrantees (including contractors and subcontractors) any of the following and, if required, how it will incorporate them into binding legal commitments in the subgrants it makes:

- a. Using a directly employed workforce, as opposed to a subcontracted workforce;
- b. Paying prevailing wages and benefits to workers, including compliance with Davis-Bacon and Service Contract Act requirements, where applicable, and collecting the required certified payrolls;
- c. Using project labor agreements (i.e., pre-hire collective bargaining agreements between unions and contractors that govern terms and conditions of employment for all workers on a construction project);
- d. Use of local hire provisions;
- e. Commitments to union neutrality;
- f. Use of labor peace agreements;
- g. Use of an appropriately skilled workforce (e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded);
- h. Use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure); and
- i. Taking steps to prevent the misclassification of workers.

Florida is a “right-to-work” state and therefore some of the provisions above are not applicable to a Florida state agency’s agreements with subgrantees. FloridaCommerce’s requirements for subgrantees to submit information will not include anything that is not covered in a previous section. That said, as already noted in the previously covered scoring rubrics, a Fair Labor Standards practices section in the rubric will be used to award points to applicants for adherence to state and federal labor laws.

For example, subgrantees will be required to demonstrate their commitment to a highly skilled workforce in the application. The Office has historically placed an emphasis on granting broadband funding to applicants that can prove this commitment; the most recent example of this is the Office’s Broadband Opportunity Program (BOP). Under the “Organization Capability and Track Record” section of the BOP application, applicants are required to submit a narrative about the organization’s experience and results in having deployed similar networks; a summary of all key personnel that will manage the project; and a resume of all key personnel. The BOP scoring rubric also takes into consideration the capabilities and track record of applicants. The Office will plan to bring the BOP’s emphasis on highly skilled personnel into the BEAD Program application and scoring rubric.

## 2.8 Workforce Readiness (Requirement 12)

---

2.8.1 Text Box: Describe how the Eligible Entity and their subgrantees will advance equitable workforce development and job quality objectives to develop a skilled, diverse workforce. At a minimum, this response should clearly provide each of the following, as outlined on page 59 of the BEAD NOFO:

- a. A description of how the Eligible Entity will ensure that subgrantees support the development and use of a highly skilled workforce capable of carrying out work in a manner that is safe and effective;
- b. A description of how the Eligible Entity will develop and promote sector-based partnerships among employers, education and training providers, the public workforce system, unions and worker organizations, and community-based organizations that provide relevant training and wrap-around services to support workers to access and complete training (e.g., child care, transportation, mentorship), to attract, train, retain, or transition to meet local workforce needs and increase high-quality job opportunities;
- c. A description of how the Eligible Entity will plan to create equitable on-ramps into broadband-related jobs, maintain job quality for new and incumbent workers engaged in the sector; and continually engage with labor organizations and community-based organizations to maintain worker voice throughout the planning and implementation process; and
- d. A description of how the Eligible Entity will ensure that the job opportunities created by the BEAD Program and other broadband funding programs are available to a diverse pool of workers.

See the previous Section 2.4.4 details regarding FloridaCommerce’s October 3, 2023 meeting with workforce stakeholders for a detailed discussion on scaling up the broadband workforce in concert with the deployment of broadband infrastructure.

Overall, building out a highly skilled broadband workforce is critical to achieving Florida’s goal of 100 percent broadband connectivity within the next five years. Additionally, an available and skilled workforce is an important part of the “capital stack” for Florida’s economic development. For most companies looking to begin or expand operations, the number one factor affecting their success is access to workforce talent and workforce training. Through the BEAD Program, the state of Florida will have access to more than \$1.16 billion in broadband deployment-related funding over the next five years, and therefore must be forward-thinking about workforce needs and leverage these funds in a way that yields results long after federal funding runs out. As discussed in Section 2.5, the state of Florida estimates it may have approximately \$200 million remaining after connecting all remaining locations, though the exact amount of funds is dependent upon the subgrantee selection results. Workforce initiatives will focus on training, developing, and up-skilling Florida’s broadband-related workforce. Through conversations with workforce stakeholders, the Office has identified a need for pathways to employment and apprenticeship and pre-apprenticeship offerings. Additionally, conversations identified a need for marketing aimed at increasing awareness of job training opportunities for broadband-related professionals. As such, the Office plans to conduct a non-deployment subgrantee selection process that largely centers around addressing these

identified workforce gaps. While individual ISPs will be part of the equation for identifying and employing a trained workforce for immediate broadband needs, the state and its strong ecosystem of partners will plan for future needs. To do this, the state will harness the resources and expertise of its private sector partners, academic institutions, chambers of commerce, and local workforce development boards to develop workforce readiness initiatives and programming.

### *Sector-Based Partnerships*

Working in cooperation, public, private, education, and local workforce partners in Florida are currently designing and implementing programs that train new workers and aid existing workers in transitioning to broadband-related occupations, including registered apprenticeships and vocational training. Further, the Office is committed to develop and promote partnerships with work and labor organizations. Through past stakeholder engagement – both for BEAD and in the development of Florida’s Strategic Plan for Broadband – the Office heard the feedback of various unions that operate and advocate within Florida. Moving forward into 2024 and beyond, contact with these organizations will be maintained. In addition, LTPTs are made up of various stakeholder including worker and labor representatives. They will continue to be a source of feedback and information to the Office.

See the comprehensive Local Coordination Tracker for the more than 500 organizations that FloridaCommerce engaged in this effort.

### *Apprenticeship Programs*

Florida has a track record of success in developing apprenticeship and pre-apprenticeship programs. The state will be utilizing local workforce development boards and Florida colleges that have the capacity and are ready to partner on apprenticeship and credential programs that can be replicated statewide, along with a pre-apprenticeship piece that can be built within the high school system. Additionally, there are funds through CareerSource Florida and local workforce development boards to subsidize wages up to a year for an apprenticeship program and then expand to on-the-job training to defray some of the employer costs (such as labs and test gear). These programs will be developed in coordination with private sector partners to ensure industry buy-in and that curricula utilize industry recognized standards. Additional sources of funding and the expected scale of these programs

For example, Florida’s Miami Dade College, one of the nation’s largest and most accessible postsecondary institutions with an extensive menu of career pathway offerings and an enrollment of over 100,000 students, has an apprenticeship model from which the Office and its partners can learn.<sup>25</sup> It includes a successful partnership between the college’s nursing program and Baptist Health, where nurses who complete the program make a two-year commitment to work at Baptist Health.<sup>26</sup> Moreover, at the beginning of 2023, Miami Dade College announced it would be offering eight new Registered Apprenticeship and Pre-Apprenticeship Programs that offer free tuition, health insurance, books, and tools.<sup>27</sup> While these apprenticeship programs are not specific to broadband occupations, the model provides

---

<sup>25</sup> About Miami Dade College, <https://www.mdc.edu/about/>

<sup>26</sup> Miami Dade Registered Apprenticeship Program, <https://www.mdc.edu/apprenticeships/nurse-assistant.aspx#:~:text=This%20program%20leads%20to%20a,an%20Apprenticeship%20Certificate%20of%20Completion.>

<sup>27</sup> Miami Dade College Announces Eight New Apprenticeship Programs, [https://news.mdc.edu/press\\_release/miami-dade-college-announces-eight-new-apprenticeship-programs/](https://news.mdc.edu/press_release/miami-dade-college-announces-eight-new-apprenticeship-programs/)

one example of how future broadband programs could be developed and operate in the future.

### *College Training Pipeline*

In addition to apprenticeship programs, the Office will work with its partners to develop a college training pipeline that offers explicit credentials and training programs for broadband-specific jobs. The state can begin this work by developing prototypes, created through partnerships between academic institutions and infrastructure companies. Once these prototypes have been tested and refined, the curricula can be shared to allow for rapid replication across the state. The state will also work with colleges and universities to find ways to encourage individuals enrolled in other relevant courses – like information technology or cybersecurity – to consider a broadband credential or a no-cost training.

### *MasTec Trainee Programs*

MasTec, a multinational infrastructure engineering and construction company based in Florida, has already established training academies and trainee programs to address the major challenges associated with finding and funneling workers. MasTec has set up national training academies to help bridge the gap in workforce needs for entry level workers; there are not any pre-existing educational or degree requirements for these entry level workers. Moreover, MasTec has numerous paid trainee programs for relevant jobs including fiber splicers, aerial lineman, and outside plant (OSP) engineers. The state intends to replicate these types of training programs as additional training programs and employers are identified. Florida aims help create partnerships between companies like MasTec and the state's colleges and universities to continue addressing the gap in both entry-level and management positions (e.g., foreman, supervisors, and upper and middle management).

### *Subgrantee Workforce Initiatives & Requirements*

While the Office and its partners will implement programs and initiatives to support the sustainable growth of a highly skilled workforce, BEAD subgrantees will also have a role.

#### 1. Application and Scoring Rubric

First and foremost, subgrantees will be required to demonstrate their commitment to a highly skilled workforce in the application. The Office has historically placed an emphasis on granting broadband funding to applicants that can prove this commitment; the most recent example of this is the Office's Broadband Opportunity Program (BOP). Under the "Organization Capability and Track Record" section of the BOP application, applicants are required to submit a narrative about the organization's experience and results in having deployed similar networks; a summary of all key personnel that will manage the project; and a resume of all key personnel. The BOP scoring rubric also takes into consideration the capabilities and track record of applicants. The Office will plan to bring the BOP's emphasis on highly skilled personnel into the BEAD Program application and scoring rubric.

#### 2. Involvement in Training Pipelines and Apprenticeships

The Office will also seek subgrantees' support in developing a highly skilled workforce both within and outside of the BEAD application process. Subgrantees have expertise and resources that can be leveraged to develop successful college training pipeline programs. While the Office will encourage subgrantees to partner with the state's K-12 education institutions and Florida State College System in developing apprenticeship programs, it will also directly support

workforce initiatives that help up-skill, reskill, and expand the broadband deployment workforce. As discussed in Section 2.5, the Office will utilize BEAD funds to support workforce initiatives, such as support services, apprenticeship programs, training offerings, pathway programs, and marketing initiatives that successfully support on-ramps to broadband jobs.

### *Diverse Pool of Workers*

Florida and its partners will identify targeted strategies to recruit potential workers from throughout the state's many different talent pools and help form on-ramps for all interested potential workers, especially from communities where there's an abundance of untapped talent and an unmet demand for broadband-related skills. Many broadband-related jobs do not require a four-year degree but may require certifications and licensing. This is an enticing market with potential for a lucrative career and opportunities for advancement, not only for students, but also older unemployed and underemployed Floridians in search of a meaningful career path with upward mobility. Broadband related occupations include technicians, installers, linemen, operators, laborers, and IT, cybersecurity, and telecommunications specialists. Florida will use various means to help create awareness and pathways for a larger pool of workers throughout all parts of the state to have access to these jobs that in turn impact all communities throughout the state.

#### 1. Marketing and Communications

From K-12 education to individuals already in the workforce, there is a genuine lack of awareness of the types of high-quality broadband occupations that exist in Florida. To build out the required workforce, the state will prioritize marketing and communications with the goal of putting broadband-related occupations and careers "on the map." This work will begin with developing and actively publicizing easy-to-read charts and guidance materials to help students visualize their pathway into the field and understand the benefits of these careers.

Career day fairs and/or events are great opportunities to educate and recruit individuals into broadband occupation and careers. FloridaCommerce will work with education organizations and career centers across the state, with an emphasis on outreach to K-12 and post-secondary institutions. Additionally, FloridaCommerce will seek out organizations that have access to underemployed Floridians, including local workforce development boards.

The state will also aim to encourage workforce and education partners to include broadband occupations into priority professions that are pre-identified for high school, technical college, and state college students. There are also several existing tools the state can leverage to boost marketing and outreach. For example, Employ Florida is an easily accessible online portal that is used by job seekers, employers, and workforce partners across the state. It offers an online full-service employment center that shares job openings and helps job seekers create resumes and look for training.<sup>28</sup>

To achieve these goals, these efforts will be tailored to individual communities and zip codes, leveraging lessons learned – for example – from the successful marketing that Florida's 48 technical colleges, 28 state colleges and 24 local workforce boards use to reach targeted audiences with targeted opportunities in their respective service areas. The state can target unserved and underserved communities to help get students interested from a young age in these broadband occupations, and simultaneously support digital literacy efforts within those

---

<sup>28</sup> Employ Florida, <https://www.employflorida.com/vosnet/default.aspx>

communities.

## 2. Non-Deployment BEAD Funding for Workforce Readiness

Bringing all of the aforementioned workforce readiness opportunities to the widest group of potential workers will require ample time and resources. As such, Florida plans to use non-deployment BEAD funding, as well as other appropriate funding sources (e.g., Workforce Innovation and Opportunity Act funding) to fund workforce readiness programming to be offered through community organizations and state and local agencies. This funding will go to both established state partners, like CareerSource Florida and academic institutions, as well as vetted organizations and initiatives with a proven track record of success in delivering career readiness to targeted groups of job seekers.

## 3. Commitment to Continued Engagement

The Office is committed to workforce development and stakeholder engagement, and additional in-person sessions will allow for the state to be continually engaged with labor organizations and community-based organizations. This will help maintain worker voice throughout the planning and implementation process. The Office's significant commitment in this plan to workforce training and career pathways, including the Office's many prior public meetings and direct engagement of workforce training partners is a clear demonstration of FloridaCommerce's approach that this opportunity for broadband infrastructure investment will only be sustainably successful if a scalable parallel workforce effort accompanies the build-out, and listening to and designing programs around the needs of the existing and future workforce is critical to that success. To that end, the Office will focus early and often on mapping the skill-building of the workforce to the stated needs of the current and future state workforce.

## 4. Wrap Around Services

Applicants are strongly encouraged to consider providing wrap-around services for their workforce. Providing workforce support creates more opportunity for a larger pool of workers.

**2.8.2 Text Box:** Describe the information that will be required of prospective subgrantees to demonstrate a plan for ensuring that the project workforce will be an appropriately skilled and credentialed workforce. These plans should include the following:

- a. The ways in which the prospective subgrantee will ensure the use of an appropriately skilled workforce, e.g., through Registered Apprenticeships or other joint labor management training programs that serve all workers;
- b. The steps that will be taken to ensure that all members of the project workforce will have appropriate credentials, e.g., appropriate and relevant pre-existing occupational training, certification, and licensure;
- c. Whether the workforce is unionized;
- d. Whether the workforce will be directly employed or whether work will be performed by a subcontracted workforce; and
- e. The entities that the proposed subgrantee plans to contract and subcontract with in carrying out the proposed work.

If the project workforce or any subgrantee's, contractor's, or subcontractor's workforce is not unionized, the subgrantee must also provide with respect to the non-union workforce:

- a. The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce;
- b. For each job title required to carry out the proposed work (including contractors and subcontractors), a description of:
  - i. Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles; and
  - ii. Information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.

Florida is a "right to work state" and therefore cannot require unionization of the broadband workforce. That said, as already noted in the previously covered scoring rubrics, a Fair Labor Standards practices section in the rubric will be used to award points to applicants for adherence to state and federal labor laws.

For example, subgrantees will be required to demonstrate their commitment to a highly skilled workforce in the application. The Office has historically placed an emphasis on granting broadband funding to applicants that can prove this commitment; the most recent example of this is the Office's Broadband Opportunity Program (BOP). Under the "Organization Capability and Track Record" section of the BOP application, applicants are required to submit a narrative about the organization's experience and results in having deployed similar networks; a summary of all key personnel that will manage the project; and a resume of all key personnel. The BOP scoring rubric also takes into consideration the capabilities and track record of applicants. The Office will plan to bring the BOP's emphasis on highly skilled personnel into the BEAD Program application and scoring rubric. Information relating to the following will be collected from potential subgrantees:

- a. The ways in which the prospective subgrantee will ensure the use of an appropriately skilled workforce, e.g., through Registered Apprenticeships or other joint labor management training programs that serve all workers;
- b. The steps that will be taken to ensure that all members of the project workforce will have appropriate credentials, e.g., appropriate and relevant pre-existing occupational training, certification, and licensure;
- c. Whether the workforce will be directly employed or whether work will be performed by a subcontracted workforce; and
- d. The entities that the proposed subgrantee plans to contract and subcontract with in carrying out the proposed work.

Therefore, the Office's approach to evaluating BEAD subgrantees will focus less on restrictions or criteria that the organization's workforce must meet, and more on identifying an organization's capabilities, merit, and track record. More specifically, the following criteria may be used to assess whether prospective subgrantees demonstrate a plan to ensure that the

project workforce will be an appropriately skilled and credentialed workforce:

1. Application: The Office has historically placed an emphasis on granting broadband funding to applicants that can prove their commitment to the development and use of a highly skilled workforce; the most recent example of this is the Office's highly successful Broadband Opportunity Program (BOP). Under the "Organization Capability and Track Record" section of the BOP application, applicants are required to submit a narrative about the organization's experience and results in having deployed similar networks; a summary of all key personnel that will manage the project; and a resume of all key personnel. The Office will plan to bring the BOP's emphasis on highly skilled personnel into its BEAD Program application.

2. Monitoring and Compliance: Pursuant to 2 C.F.R. Part 200.332, the Office conducts Pre- Award risk assessments of every selected awardee and will monitor subgrantees to facilitate program compliance.<sup>29</sup> This will also include an assessment of the subgrantee workforce's performance and capabilities. Monitoring will include desk audits and on-site visits and will generally be conducted when about 15 percent of the awarded funds have been disbursed to confirm that the recipient has systems in place to properly comply with program requirements. Periodic desk audits and site visits will be conducted throughout the project based upon the results of the risk assessment, project progress and ongoing compliance. Subgrantees will also be required to submit quarterly status reports that detail the progress the project team has made and detail what steps will be taken in the next quarter.

#### Subgrantees with a Non-Union Workforce

Florida will not require subgrantee or subcontractor workforces to be unionized and will allow subgrantees to decide if they use contractors or subcontractors. However, if the project workforce or any subgrantee's, contractor's, or subcontractor's workforce is not unionized, Florida will require the following from the subgrantee with respect to the non-union workforce:

1. The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project
2. The entity that will employ each portion of the workforce

For each job title required to carry out proposed work (including contractors and subcontractors), Florida will require subgrantees to submit a description of:

1. Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles
2. Information on the professional certifications and/or in-house training in place to confirm that deployment is done at a high standard

---

<sup>29</sup> 2 C.F.R. Part 200.332, <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR031321e29ac5bbd/section-200.332>



## 2.9 Minority and Women’s Business Enterprises / Labor Surplus Area Firms Recruited

---

### (Requirement 13)

2.9.1 Text Box: Describe the process, strategy, and the data tracking method(s) the Eligible Entity will implement to ensure that minority businesses, women-owned business enterprises (WBEs), and labor surplus area firms are recruited, used, and retained when possible.

The FloridaCommerce Office of Broadband plans to comply with requirements in state law to implement a variety of strategies to ensure that minority business enterprises (MBEs), women’s business enterprises (WBEs), and labor surplus area firms (LSAs) may be recruited, used, and retained when possible. The Office intends to promote these opportunities to a wide range of entities in their efforts to build a more connected Florida.

For the purpose of the discussion of Requirement 13, under section 287.09451, Florida Statutes, the Florida Department of Management Services developed the following requirements to be considered a minority business enterprise and women’s business enterprise in the state of Florida:<sup>30</sup>

- Be legally registered to do business in Florida as a for-profit organization (registered through the Department of State).
- Be based in Florida.
- Be owned and managed by a resident(s) of Florida.
- Be 51 percent owned and managed by a woman, veteran, or minority who is a U.S. citizen or permanent resident alien.
- Be engaged in commercial transactions (currently doing business).
- Be registered in [MyFloridaMarketPlace](#).
- Have a net worth of less than \$5 million.
- Have 200 or fewer full-time permanent employees.
- Have a professional license, if required by the industry, in the name of the woman, veteran, or minority business owner.

For the purposes of the discussion of Requirement 13, a labor surplus area firm is defined by the U.S. Department of Labor as a civil jurisdiction that has a civilian average annual unemployment rate during the previous two calendar years of 20% or more above the average annual civilian unemployment rate for all states (including Puerto Rico) during the same 24-month reference period.<sup>31</sup>

To ensure compliance with Florida law, where applicable, the Office may pursue strategies that promote the six steps towards recruitment of MBEs, WBEs, and LSAs detailed in the BEAD NOFO. These steps and their associated strategies are detailed below:

1. Place qualified small and minority businesses and women’s business enterprises on solicitation lists.
  - Encourage eligible businesses to register as Small Disadvantaged Businesses (SDB),

---

<sup>30</sup> Get Certified, Florida Department of Management Services. Accessed on October 25, 2023 at [https://www.dms.myflorida.com/agency\\_administration/office\\_of\\_supplier\\_diversity\\_osd/get\\_certified](https://www.dms.myflorida.com/agency_administration/office_of_supplier_diversity_osd/get_certified)

<sup>31</sup> Frequently Asked Questions, U.S. Department of Labor. Accessed on October 26, 2023, at <https://www.dol.gov/agencies/eta/lsa/faq>

WBEs, and MBEs. Because broadband deployment cuts across varying government services, the Office is well positioned to promote registration certification through the Florida Department of Managed Services.

- Leverage a small business agency or local database to obtain a list of MBEs, WBEs, or LSAs that can be referenced when soliciting proposals. Utilizing these sources in addition to federal resources will help create the most complete view of potential MBEs, WBEs, and LSAs that can be utilized.
  - Assure that small and minority businesses and women's business enterprises are solicited whenever they are potential sources.
  - Make advertisements to potential MBEs, WBEs and LSAs about opportunities. The state of Florida wants small and minority businesses and women's business to have awareness of potential projects so that they may get involved.
  - Publish and promote BEAD funding opportunities broadly to encourage a wide range of prospective subgrantees. Florida is a large, diverse state and it is important to the Office that the reach of bid information is widespread.
2. Divide the total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises.
    - Break down projects into smaller phases throughout buildout, when appropriate. The Office is hopeful that smaller project sizes will be less limiting for MBEs, WBEs, and LSAs.
  3. Establish delivery schedules, where the requirement permits, which encourage participation by small and minority businesses and women's business enterprises.
    - Support MBEs, WBEs and LSAs in adhering to delivery schedules. The Office wants all businesses to have fair and reasonable delivery schedules to promote success.
  4. Use the services and assistance, as appropriate, of such organizations as the Small Business Administration (SBA) and the U.S. Department of Commerce, Minority Business Development Agency (MBDA).
    - Encourage subgrantees to consult with SBA's Small Business Development Centers and MBDA's State-Based Business Centers. Utilizing existing services and resources will help provide a thorough base of support for MBEs, WBEs, and LSAs.
  5. Require subgrantees to take the affirmative steps listed above as it relates to its subcontractors.
    - Accept an MBE, WBE and LSA recruitment plan and additional relevant documentation stating a commitment to adhering to MBE, WBE and LSA utilization.

2.9.2 Check Box: Certify that the Eligible Entity will take all necessary affirmative steps to ensure minority businesses, women's business enterprises, and labor surplus area firms are used when possible, including the following outlined on pages 88 – 89 of the BEAD NOFO:

- a. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- b. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities

to permit maximum participation by small and minority businesses, and women's business enterprises;

d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;

e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and

f. Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

The FloridaCommerce Office of Broadband certifies that it will take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

## 2.10 Cost and Barrier Reduction (Requirement 14)

---

2.10.1 Text Box: Identify steps that the Eligible Entity will take to reduce costs and barriers to deployment. Responses may include but not be limited to the following:

- a. Promoting the use of existing infrastructure;
- b. Promoting and adopting dig-once policies;
- c. Streamlining permitting processes;
- d. Streamlining cost-effective access to poles, conduits, easements; and
- e. Streamlining rights of way, including the imposition of reasonable access requirements.

Through its experience managing nearly \$500 million in broadband deployment grants, the Office of Broadband has witnessed the common barriers and costs to deployment. Many of these obstacles and barriers were identified in Florida's BEAD Five-Year Action Plan, including a lack of coordination between utility assets and broadband deployment opportunities, poor coordination between infrastructure installation projects, and others involving inadequate data. Still, the Office intends to explore ways to support subgrantees through the duration of the BEAD Program. The following six areas outline the ways in which the Office intends to support cost and barrier reduction through the duration of the program.

### *1. Legislative Changes*

In 2023, the state of Florida passed House Bill 1221: Broadband Internet Service Providers, which specifies that the Public Service Commission (PSC) can regulate the poles of rural electric cooperatives that provide broadband. It also allows the PSC to access the books and records of these cooperatives for specific purposes.

### *2. Promotion of 811 Program*

While there are no dig-once policies in Florida, nor any plans to codify a statewide dig-once policy, there is a dedicated 811 program, "Sunshine 811," in the state. This is a free service which aims to avoid damage to buried utilities and encourage safe and coordinated excavations. Sunshine 811 will notify its member utility companies so that they can mark their lines, pipes, and cables.

As identified in the Florida Strategic Plan for Broadband, the Office regularly engages with state agencies such as the Florida Department of Transportation for best practices and methods in planning infrastructure construction projects which co-locate resources, utilities, or services. It also coordinates to disseminate this information to all interested parties, make it available by request, or conveniently publish online.

Further, the Office regularly provides information through toolkits, outreach, and website available about the use of dig-once policies, including in the Broadband Planning Toolkit available for LTPTs and other broadband actors in the state.

### *3. Promoting the Use of Existing Infrastructure*

The use of existing infrastructure can both expedite deployment and reduce overall project costs. The Office incorporated a part of the scoring criteria to acknowledge and incentivize the use of existing infrastructure in BEAD deployment efforts.

#### *4. Soliciting Feedback from Providers*

ISPs in Florida offer a breadth and depth of experience when it comes to managing around and through obstacles to broadband deployment. The Office is proud of the relationships fostered and intends to build on those strong connections as it looks ahead to the BEAD Program. For example, the Office will increase touchpoints with Florida Department of Transportation to look for chances to leverage existing permitting.

#### *5. Streamlining Permitting*

The Office plans to closely monitor existing permitting processes in the state and will adjust its course where needed. The Office will track permitting as awards are awarded to subgrantees in order to identify and address delays or issues.

#### *6. Soliciting Feedback from LTPTs*

Local Technology Planning Teams (LTPT) are a unique feature of the broadband ecosystem in Florida. As statutorily created county-level teams (67 in total) devoted to technology and broadband planning for communities, LTPTs offer a key point of view when it comes to expanding deployment, adoption, and use across the state.<sup>32</sup> The Office will continue to rely on LTPTs for their insights and feedback through the program. The Office meets with LTPTs on a monthly basis and will continue this cadence in addition to ad hoc conversations that arise. As deployment ramps up, touchpoints will focus increasingly on identifying and mitigating costs and barriers.

In addition to these steps, the Office is working to promote the training and enhancement of Florida's workforce so that deployment projects are completed efficiently and effectively.

---

<sup>32</sup> Fla. Stat. § 288.9961(4)(b)

## 2.11 Climate Assessment (Requirement 15)

---

2.11.1 Text Box: Describe the Eligible Entity’s assessment of climate threats and proposed mitigation methods. If an Eligible Entity chooses to reference reports conducted within the past five years to meet this requirement, it may attach this report and must provide a crosswalk narrative, with reference to page numbers, to demonstrate that the report meets the five requirements below. If the report does not specifically address broadband infrastructure, provide additional narrative to address how the report relates to broadband infrastructure. At a minimum, this response must clearly do each of the following, as outlined on pages 62 – 63 of the BEAD NOFO:

- a. Identify the geographic areas that should be subject to an initial hazard screening for current and projected future weather and climate-related risks and the time scales for performing such screenings;
- b. Characterize which projected weather and climate hazards may be most important to account for and respond to in these areas and over the relevant time horizons;
- c. Characterize any weather and climate risks to new infrastructure deployed using BEAD Program funds for the 20 years following deployment;
- d. Identify how the proposed plan will avoid and/or mitigate weather and climate risks identified; and
- e. Describe plans for periodically repeating this process over the life of the Program to ensure that evolving risks are understood, characterized, and addressed, and that the most up-to-date tools and information resources are utilized.

As a peninsula state, Florida knows firsthand how extreme weather can have an adverse effect on infrastructure. Due to its location and unique geographical ecosystems, the state faces unique weather risks and hazards that can cause damage to broadband infrastructure or delay its deployment.

With this in mind, the Office of Broadband reviewed key literature outlined in the BEAD NOFO and utilized the Federal Emergency Management Agency’s (FEMA) National Risk Index to identify hazards specific to counties in Florida.<sup>33</sup> This Risk Index is continuously updated and provides information on the risk of a variety of weather events to individual counties and census tracts on a scale of “very low” to “very high.”

By utilizing this index, the state identified six hazards that pose a “very high risk” to 22 of 67 Florida counties (33%). These counties will require an initial risk screening based on their risk levels. The hazards posing risks include cold waves, hurricanes, lightning, riverine flooding, strong winds, and tornadoes. These hazards should be important to account for and respond to for the foreseeable future. For the purposes of this discussion, the definitions of these

---

<sup>33</sup> National Risk Index Map | National Risk Index, Federal Emergency Management Agency (FEMA). Accessed on October 26, 2023, at <https://hazards.fema.gov/nri/map#>

hazards are defined below.<sup>34</sup>

- Cold Wave: A rapid fall in temperature within 24 hours and extreme low temperatures for an extended period. The temperatures classified as a cold wave are dependent on the location and defined by the local National Weather Service (NWS) weather forecast office.
- Hurricane: A tropical cyclone or localized, low-pressure weather system that has organized thunderstorms but no front (a boundary separating two air masses of different densities) and maximum sustained winds of at least 74 mph.
- Lightning: A visible electrical discharge or spark of electricity in the atmosphere between clouds, the air and/or the ground often produced by a thunderstorm.
- Riverine Flooding: Streams and rivers exceed the capacity of their natural or constructed channels to accommodate water flow and water overflows the banks, spilling out into adjacent low-lying, dry land.
- Strong Wind: Consists of damaging winds, often originating from thunderstorms, that are classified as exceeding 58 mph.
- Tornado: A narrow, violently rotating column of air that extends from the base of a thunderstorm to the ground and is visible only if it forms a condensation funnel made up of water droplets, dust, and debris.

Based on FEMA’s analysis, most counties in Florida are deemed to be susceptible to some weather risks and hazards. However, counties with a FEMA-defined “very high” risk are detailed in Table 5.

Table 5: Risk and Hazards by County in Florida

County	Cold Wave	Hurricane	Lightning	Riverine Flooding	Strong Wind	Tornado
Bay			X			
Brevard	X	X	X			
Broward		X	X			
Collier		X	X			
Duval			X			
Escambia			X			
Hillsborough		X	X			X
Lee		X	X			
Manatee		X	X			
Miami-Dade		X	X	X		
Okaloosa			X			
Orange	X		X			X
Osceola	X					
Palm Beach		X	X			
Pasco	X	X	X			
Pinellas		X	X			
Polk	X		X		X	

<sup>34</sup> Natural Hazards, FEMA. Accessed on October 26, 2023, at <https://hazards.fema.gov/nri/natural-hazards>

Santa Rosa			X			
Sarasota		X	X			
Seminole	X					
St. Lucie	X	X				
Volusia			X			

**Weather Risks and Hazards to Broadband Infrastructure**

*Cold Waves*

There are seven counties in Florida which are at “very high” risk for cold waves: Brevard, Orange, Osceola, Pasco, Polk, St. Lucie, and Seminole. Cold or freezing temperatures can damage network equipment, such as causing cables to stiffen and become brittle.

*Hurricanes*

There are 12 counties in Florida which are at “very high” risk for hurricanes: Brevard, Broward, Collier, Hillsborough, Lee, Manatee, Miami-Dade, Palm Beach, Pasco, Pinellas, Sarasota, and St. Lucie. Hurricanes can affect broadband infrastructure in a variety of ways. Strong winds and rains can impact aerial fiber and poles as they are exposed to the elements. In addition, wireless/satellite distribution or access points can be destroyed by the storms. Underground fiber can also be damaged or disrupted during severe storms.

*Lightning*

There are 19 counties in Florida which are at “very high” risk for lightning: Bay, Brevard, Broward, Collier, Duval, Escambia, Hillsborough, Lee, Manatee, Okaloosa, Orange, Miami-Dade, Palm Beach, Pasco, Pinellas, Polk, Santa Rosa, Sarasota, and Volusia. Florida is very prone to lightning storms, and these events are most likely to affect above-ground broadband infrastructure, such as poles and aerial fiber cables.

*Riverine Flooding*

There is one county in Florida which is at “very high” risk for riverine flooding: Miami-Dade. Flooding can damage fiber deployed underground. While cables are made to resist water under normal operating conditions, extreme flooding can have a negative effect on service.

*Strong Winds*

There is one county in Florida which is at “very high” risk for strong wind: Polk. Strong winds have the potential to damage aerial infrastructure, as the poles and fiber lines are suspended and exposed to the elements.

*Tornadoes*

There are two counties in Florida which are at “very high” risk for tornadoes: Hillsborough and Orange. Tornadoes have the potential to damage aerial infrastructure, as the poles and fiber lines are exposed. There is also a potential that wireless/satellite services could be disrupted due to heavy winds.

**20-Year Risk Horizon**

As described above, there are a variety of climate events that may occur that could affect broadband infrastructure throughout the 20 years following deployment. These include but are not limited to: cold waves, hurricanes, lightning, riverine flooding, strong winds, and tornadoes. The state will be proactive and work to get ahead of these events as they come up to mitigate preventative damages.

**Risk Mitigation Measures**



The Office of Broadband aims to avoid and mitigate severe weather risks identified through a variety of strategies. By incorporating resilient designs, developing mitigation and response plans, and encouraging the hardening of assets, the state of Florida aims to strengthen its broadband infrastructure to withstand unpredictable events. Because of extreme weather conditions that frequently occur in the state, providers are already aware of and thinking through risk mitigation measures for risks.

In addition to the information provided by the FEMA risk index, the Office of Broadband also intends to use the risk assessment provided by the Florida Division of Emergency Management (DEM). This assessment is a robust 2023 State Hazard Mitigation Plan, which identifies hazards based on the history of disasters within Florida.<sup>35</sup> This important detail will supplement the Office's understanding of the weather risks that intersect with the deployment aims of the state. The assessment provides a good starting point as the Office of Broadband conducts additional broadband specific planning.

Because weather risks and hazards are continuously evolving, utilizing the most up-to-date tools and information will help risks be better understood, characterized, and addressed. Moving forward, the Office will consult NTIA provided resources, including the National Oceanic and Atmospheric Administration's (NOAA) Disaster Risk Mapping tools, the FEMA National Risk Index, the Climate Mapping for Resilience and Adaptation Assessment Tool, and state-specific information provided by the United States Geological Survey (USGS).

The Office will encourage applicants to use these resources to provide risk assessments as part of their applications. If awarded, the subgrantees will then monitor these risks for any changes and update mitigation plans accordingly as part of the routine subgrantee reporting process. Revisions may include updates to types of weather risks, which counties are at risk, and strategies to mitigating risks and increasing resilience. New data and technology that are presented in the future can help contribute to these plan updates.

**2.11.1.1 Optional Attachment:** As an optional attachment, submit any relevant reports conducted within the past five years that may be relevant for this requirement and will be referenced in the text narrative above.

The Office of Broadband has included references and links as footnotes for sources utilized in the text above.

---

<sup>35</sup> Natural Hazards, Division of Emergency Management. Accessed on October 26, 2023, at <https://flshmp-floridadisaster.hub.arcgis.com/pages/natural-hazards>

## 2.12 Low-Cost Broadband Service Options (Requirement 16)

---

2.12.1 Text Box: Describe the low-cost broadband service option(s) that must be offered by subgrantees as selected by the Eligible Entity, including why the outlined option(s) best services the needs of residents within the Eligible Entity’s jurisdiction. At a minimum, this response must include a definition of low-cost broadband service option that clearly addresses the following, as outlined on page 67 of the BEAD NOFO:

- a. All recurring charges to the subscriber, as well as any non-recurring costs or fees to the subscriber (e.g., service initiation costs);
- b. The plan’s basic service characteristics (download and upload speeds, latency, any limits on usage or availability, and any material network management practices);
- c. Whether a subscriber may use any Affordable Connectivity Benefit subsidy toward the plan’s rate; and
- d. Any provisions regarding the subscriber’s ability to upgrade to any new low-cost service plans offering more advantageous technical specifications.

While the Florida Office of Broadband (ConnectedFlorida) recognizes the importance of affordable access to broadband, ConnectedFlorida philosophically disagrees with the NTIA’s position that rate requirements are not rate setting. However, ConnectedFlorida has worked diligently to find a data-driven solution that meets the NTIA’s requirements, improves the potential for companies to participate in the program and serves all Floridians. Providers may offer the same low-cost plans, at their discretion, for less than the low-cost plan formula set below.

The plan required to be offered by subgrantee applicants will have the following elements:

- **Eligibility:** Eligibility criteria for the low-cost plan will be the same as those for the Affordable Connectivity Program or another relevant federal program (e.g., Lifeline) in the event the Affordable Connectivity Program does not continue
- **Speed:** 100mbps/20mbps minimum or the fastest speeds the infrastructure is capable of offering if less than 100mbps/20mbps
- **Latency:** No more than 100 milliseconds
- **Terms:** No data caps, surcharges, or usage-based throttling; subject to the same acceptable use policies to which subscribers to all other broadband internet service plans offered to home subscribers by the subgrantee applicant must adhere
- **Changes:** If the subgrantee applicant offers a low-cost plan with higher speeds downstream and/or upstream, there will be no restrictions for eligible subscribers to the low-cost plan to upgrade for no additional cost
- **Cost:** The state will adopt a formula-based approach, pegged to the state’s household income data. This enables Florida’s low-cost plan to account for evolving macro factors such as inflation and changing income levels and to be tailored to the state-specific context. The formula is set forth below:

$$\text{State monthly max. LCP price} = \frac{\text{avg of the state second and third quintile household income interval means}}{2} \times 2\%$$

12

The above formula stipulates that the annual cost of the state’s low-cost plan should not

exceed 2% of the average of the state's [second and third-quintile household income means](#) for [family of three](#). This value is then divided by 12 to determine the monthly price for the state's low-cost plan. Eligible consumers must be able to apply the ACP benefit to the low-cost plan price to further reduce the cost to the consumer. ConnectedFlorida reserves the right to adjust its low-cost plan requirements to best serve Floridians, with approval from NTIA. Subgrantee applicants may request waivers to the monthly low-cost plan price. However, the waiver cannot propose a monthly cost, inclusive of all taxes, fees, and charges, that exceeds the average for the applicable year's average monthly rate for Internet services as published by the [U.S. Bureau of Labor Statistics](#). The waiver may be granted if the subgrantee applicant:

- Demonstrates the current monthly low-plan price would be financially unsustainable for the subgrantee applicant.
- Provides a justification for the increase and details the efforts made to minimize costs.
- Ensures any additional costs passed on to the consumer will be clearly communicated in a timely manner.
- **Price Increases:** Subgrantee applicants may increase their low-cost plan price and waiver annually to commensurate with the annual seasonally adjusted percentage change in the [Consumer Price Index for All Urban Consumers: All Items Less Food & Energy as defined by the U.S. Bureau of Labor Statistics](#).
- **Duration:** This plan must be offered for ten years after service begins
- **ACP:** Subgrantee applicants must agree to participate in the ACP or ACP successor program, as identified by NTIA.

***Justification:*** The formula's focus on the [second and third quintiles](#) of household incomes means for [family of three](#) ensures that the maximum monthly amount is designed for low- and moderate-income households. Tying the maximum monthly price to these quintiles ensures that low- and moderate-income households are not overburdened by costs, thus promoting digital accessibility.

2.12.2 Checkbox: [Certify that all subgrantees will be required to participate in the Affordable Connectivity Program or any successor program.](#)

The FloridaCommerce Office of Broadband certifies that all subgrantees will be required to participate in the Affordable Connectivity Program or any successor program.

## 2.13 Middle Class Affordability Plans (Requirement 20)

---

2.13.1 Text Box: Describe a middle-class affordability plan that details how high-quality broadband services will be made available to all middle-class families in the BEAD-funded network’s service area at reasonable prices. This response must clearly provide a reasonable explanation of how high- quality broadband services will be made available to all middle-class families in the BEAD-funded network’s service area at reasonable prices.

With a population of 22.2 million, Florida remains committed to encouraging reliable and affordable broadband access to all residents, businesses, and communities within the state.<sup>36</sup> While it is not the role of the state to dictate price points for consumers, Florida intends to adopt the following strategies to encourage affordability for consumers.

### *Use of Affordability Scoring Criteria in BEAD Subgrantee Reviews*

Affordability will be a priority consideration for scoring in compliance with the BEAD Program. The Office already uses “Affordability & Adoption Assistance” factors for consideration in the Broadband Opportunity and Capital Projects Fund Programs to encourage affordability measures among prospective subgrantees. Building on this work, the Office incorporated these elements plus additional scoring incentives for providers to offer affordable options for middle-class customers.

### *Requiring Low-Cost Service Option*

Florida is requiring that providers offer a low-cost service option for eligible customers. More detail on the low-cost service option can be found in Requirement 16. This provision enables subgrantees who are accepting BEAD subgrants to offer broadband services that are both affordable and reasonable for eligible populations.

### *Continued Feedback from LTPTs and Other Stakeholders*

The Office will continue to gather feedback through ongoing engagement with LTPTs and other stakeholders. This feedback will be used to inform the state on affordability. Florida maintains strong relationships with a diverse network of stakeholders and will utilize their expertise in maintaining middle-class affordability.

### *Explore Methods of Better Understanding Rates Across the State*

The methods suggested above are not inclusive of every strategy that the Office of Broadband will pursue to maintain middle-class affordability. The Office will continue to iterate and explore additional methods to better encourage affordability for end-consumers. This may include working with ISPs to better understand document pricing across the state, developing a benchmarking system using publicly available data, or collaborating on a combined approach that encourages ISPs to report data about service options available at various price points.

In the end, the most sustainable approach to expanding the affordability of broadband services is to bolster the earnings and economic opportunities for Floridians. FloridaCommerce manages a wide range of programs to maintain full employment, promote better wages for all, and expand the economic vibrancy across the state.

---

<sup>36</sup> United States Census Bureau, <https://www.census.gov/quickfacts/fact/table/FL/PST045222>

## 2.14 Use of 20 Percent of Funding (Requirement 17)

2.14.1 Text Box: Describe the Eligible Entity's planned use of any funds being requested, which must address the following:

- a. If the Eligible Entity does not wish to request funds during the Initial Proposal round, it must indicate no funding requested and provide the rationale for not requesting funds.
- b. If the Eligible Entity is requesting less than or equal to 20 percent of funding allocation during the Initial Proposal round, it must detail the amount of funding requested for use upon approval of the Initial Proposal, the intended use of funds, and how the proposed use of funds achieves the statutory objective of serving all unserved and underserved locations.
- c. If the Eligible Entity is requesting more than 20 percent (up to 100 percent) of funding allocation during the Initial Proposal round, it must detail the amount of funding requested for use upon approval of the Initial Proposal, the intended use of funds, how the proposed use of funds achieves the statutory objective of serving all unserved and underserved locations, and provide rationale for requesting funds greater than 20 percent of the funding allocation.

The FloridaCommerce Office of Broadband and the state of Florida are committed to expanding broadband service to all residents, businesses, and communities throughout the state. As such, Florida is requesting 100% of its funding allocation during the Initial Proposal round to expedite broadband deployment. With nearly \$1.17 billion available to reach unserved and underserved locations, the Office's goal is to generate a connected economy across Florida.<sup>37</sup>

Florida has substantial experience conducting subgrantee application reviews and awarding grants to providers for broadband deployment expansion. Through the state-administered Broadband Opportunity Program, the Office awarded more than \$348 million across 53 counties between February 2023 and February 2024, bringing broadband Internet service to more than 140,000 unserved homes and businesses across the state. After launching the application cycle for the Capital Projects Fund (CPF) Broadband Infrastructure Program in February 2023, the Office awarded more than \$247 million through the CPF Broadband Infrastructure Program in July, connecting more than 59,000 unserved and underserved businesses, homes, farms, and community anchor institutions like hospitals and libraries. The Office of Broadband shares the NTIA's goal of

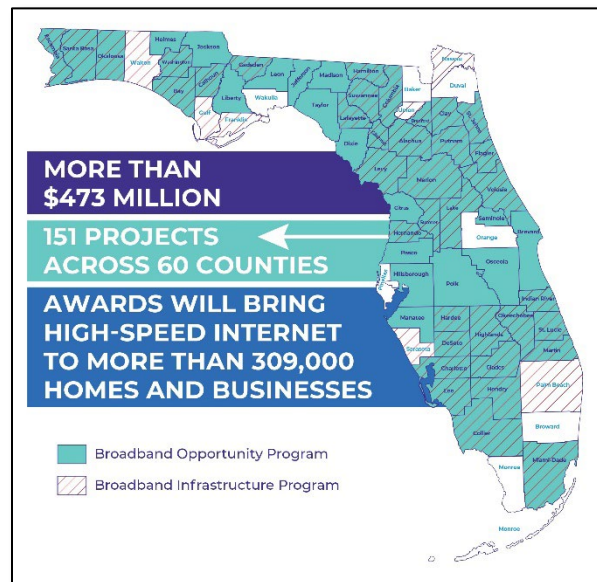


Figure 6: FloridaCommerce Office of Broadband Program Highlights

<sup>37</sup> BroadbandUSA National Telecommunications and Information Administration, Biden-Harris Administration Announces State Allocations for \$42.5 Billion High-Speed Internet Grant Program as Part of Investing in America Agenda, <https://broadbandusa.ntia.doc.gov/news/latest-news/biden-harris-administration-announces-state-allocations-4245-billion-high-speed>

expedient service to unserved and underserved communities. As such, the Office stands ready to expand on its previous success in awarding deployment grants using BEAD funds. The Office anticipates approximately 140,000 remaining unserved and underserved locations following completion of existing programs which can easily be served with BEAD funding allocated for deployment. Non-deployment activities consist primarily of workforce development and cybersecurity training, both of which are essential to infrastructure deployment and safe and secure operation of systems and individual devices. Receiving the full allocation will prevent delays in connecting currently unserved and underserved communities across Florida.

Secondly, construction in Florida must contend with the unpredictability that comes from extreme weather events. While greater detail is outlined in Requirement 15 Climate Assessment, hurricane season from June 1 through November 30 each year poses potential pauses and delays in construction.<sup>38</sup> While the state is well-equipped to manage these emergencies, well-intentioned construction schedules for Broadband deployment are no exception. Potential waiting periods for BEAD funding could risk delay but can be mitigated through detailed planning and mitigation measures. Quickly obligating funding to projects can help maximize the workdays around extreme weather events throughout the duration of the BEAD Program. The full allocation will help to provide services to all unserved and underserved locations in Florida as soon as possible and mitigate adverse effects due to weather.

Thirdly, the Office plans to use funds to facilitate a successful challenge process, contribute to a speedy subgrantee selection, and support other activities that may arise to support the Final proposal. As the work transitions from planning to implementation, the Office plans to move expeditiously to connect unserved and underserved parts of the state.

Fourth, as part of those efforts to bring broadband service to unconnected parts of Florida, the Office plans to work within the recommended uses in the BEAD NOFO to connect the low-and middle-income areas. The BEAD NOFO states that an Eligible Entity may use its allocation to fully fund deployment projects that “are in a location in which the percentage of individuals with a household income at or below 150 percent of the poverty line applicable to a family of the size involved that is higher than the national percentage of such individuals.”<sup>39</sup> Planning for these efforts is important to Florida, and Office intends to leverage BEAD funding for this purpose.

Lastly, the Office proposes to simultaneously dedicate a portion of BEAD funds for training, workforce, and cybersecurity initiatives in tandem with deployment, as achieving access goals will only be possible if Florida’s broadband-related workforce is scaled up to meet the needs of building out communities’ access to broadband at acceptable speeds. Waiting until later releases of funding to scale up Florida’s broadband workforce would in effect defeat the underlying goals of closing gaps in access to broadband throughout the state. Any planned deployment projects that occur prior to the approval of the Final Proposal will be compliant with all relevant National Environmental Policy Act, Environmental Historic Preservation (EHP) and Build America, Buy America Act (BABA) requirements and will involve low-to-moderate income census blocks.

Florida is requesting obligation of these funds and access to these funds upon approval of the Initial Proposal Volume 2. Under Deployment Activities, \$103,886,932 will be used to cover all areas that consist of at least 80 percent unserved locations and are in a location in which the percentage of

---

<sup>38</sup> Florida Climate Center, “Hurricanes”, accessed on October 16, 2023, at: <https://climatecenter.fsu.edu/topics/hurricanes>

<sup>39</sup> Broadband Equity, Access, and Deployment (BEAD) Program, “Initial Proposal Guidance) Pg. 84, accessed on April 12, 2024, at: [https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD\\_Initial\\_Proposal\\_Guidance\\_Volumes\\_I\\_II.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf)

individuals with a household income at or below 150 percent of the poverty line. Under Non-Deployment Activities, \$110,000,000 will be used to build out a highly skilled broadband workforce critical to achieving Florida’s goal of 100 percent broadband connectivity within the next five years; and \$30,000,000 will be used to conduct cybersecurity training and technical assistance to providers and households to ensure a secure network and safe operation of digital devices by the general citizenry. The remaining balance of \$921,060,483.71 is requested for obligation upon approval of Initial Proposal Volume 2. Table 6 below includes the planned use of funds requested. More details can be found in Appendix I.

*Table 6: Estimated Use of Funds Requested*

Category	Details	Budget Percent	Amount
Deployment Activities	Deployment to low-income locations, deployment to unserved/underserved locations, deployment on tribal lands	83%	\$971,587,914
Non-Deployment Activities	Workforce development, cybersecurity and digital literacy grants, contractors for subrecipient assistance	12%	\$140,000,000
Programmatic Costs	Application intake, compliance and monitoring, media, legal services, etc.	4%	\$42,553,464
Administrative Costs	Personnel, office support, office contractual support	1%	\$10,806,037.71
Total Requested			\$1,164,947,415.71

2.14.2 Financial Data Entry: Enter the amount of the Initial Proposal Funding Request. If not requesting initial funds, enter ‘\$0.00.’

The Office is requesting \$1,164,947,415.71.

2.14.3 Check Box: Certify that the Eligible Entity will adhere to BEAD Program requirements regarding Initial Proposal funds usage. If the Eligible Entity is not requesting funds in the Initial Proposal round and will not submit the Initial Funding Request, note “Not applicable.”

The FloridaCommerce Office of Broadband certifies it will adhere to the BEAD Program requirements regarding Initial Proposal funds usage.

## 2.15 Eligible Entity Regulatory Approach (Requirement 18)

---

### 2.15.1 Text Box:

a. Disclose whether the Eligible Entity will waive all laws of the Eligible Entity concerning broadband, utility services, or similar subjects, whether they predate or postdate enactment of the Infrastructure Act that either (a) preclude certain public sector providers from participation in the subgrant competition or (b) impose specific requirements on public sector entities, such as limitations on the sources of financing, the required imputation of costs not actually incurred by the public sector entity, or restrictions on the service a public sector entity can offer.

b. If the Eligible Entity will not waive all such laws for BEAD Program project selection purposes, identify those that it will not waive (using the Excel attachment) and their date of enactment and describe how they will be applied in connection with the competition for subgrants. If there are no applicable laws, note such.

The state of Florida does not have any laws that preclude public sector providers from participation in the subgrant selection process. However, the state does have a law (section 350.81, Florida Statutes) that imposes specific requirements on public sector broadband providers, and it will not waive this law as part of the BEAD Program project selection process. Details on this law and its contents are provided in the “Florida BEAD Initial Proposal Volume II Eligible Entity Regulatory Approach” attachment provided along with this Initial Proposal.<sup>40</sup>

2.15.1.1 Optional Attachment: As a required attachment only if the Eligible Entity will not waive laws for BEAD Program project selection purposes, provide a list of the laws that the Eligible Entity will not waive for BEAD Program project selection purposes, using the Eligible Entity Regulatory Approach template provided.

Please see the attachment labeled “Florida BEAD Initial Proposal Volume II Eligible Entity Regulatory Approach” provided along with this Initial Proposal.

---

<sup>40</sup> Florida Statute 350.81, <https://www.flsenate.gov/laws/statutes/2021/350.81>



## 2.16 Certification of Compliance with BEAD Requirements

---

### (Requirement 19)

2.16.1 Check Box: Certify the Eligible Entity's intent to comply with all applicable requirements of the BEAD Program, including the reporting requirements.

The FloridaCommerce Office of Broadband intends to comply with all applicable requirements of the BEAD Program, including the reporting requirements.

2.16.2 Text Box: Describe subgrantee accountability procedures, including how the Eligible Entity will, at a minimum, employ the following practices outlined on page 51 of the BEAD NOFO:

- 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);
- b. The inclusion of clawback provisions (i.e., provisions allowing recoupment of funds previously disbursed) in agreements between the Eligible Entity and any subgrantee;
- c. Timely subgrantee reporting mandates; and
- d. Robust subgrantee monitoring practices.

The FloridaCommerce Office of Broadband intends to employ subgrantee accountability procedures to facilitate BEAD projects that meet established expectations.

#### Distribution of Funding

The Office will distribute funding to subgrantees on fixed award subgrant basis, following all requirements of NTIA's modifications to the Uniform Guidance as provided in Modified Guidance from May 17, 2023. Upon final execution of the subgrant agreement, funding will be distributed based on provider certification and Office of Broadband verification at predetermined thresholds of completion. The Office will evaluate project progress to reimburse funds at 10%, 30%, 50% and 85% completion, with the final 100% of funding provided only after verification of deployment to all eligible locations within the deployment timeline. In short, the Office of Broadband will disburse funds tied to verified milestones for completed deployments that comply with the terms included in the successful application and will withhold funds for failure to do so. Feedback will be provided on the financial and programmatic progress of BEAD-funded projects, noting any discrepancies, and submit it to the Office for review and ultimate approval.

#### Clawback Provisions

Florida's subrecipient agreements include clear penalties for non-performance, including clawback provisions to recoup disbursed funds if a subgrantee fails to continue to adhere to the obligations established in the grant agreement. Subgrantees that fail to meet expectations shall forfeit any awarded funds, up to the entire amount received through the program. Examples of such behavior include but are not limited to: failing to provide the minimum advertised connection speed, failing to set cost at the advertised rate, or refusal to submit progress or financial reports. The state plans to adopt existing Broadband Opportunity Program subgrantee agreements and alter them to align with the BEAD NOFO.

#### Timely Subgrantee Reporting Requirements

Subgrantees will be required to submit reports quarterly to the Office with updates including but not limited to deployment schedules, financial updates, and descriptions of projects/activities progress and completion. Subgrantees must maintain detailed records to be able to provide the information request.

#### Subgrantee Monitoring Practices

The Office has developed monitoring plans in conjunction with the Broadband Opportunity and Capital Projects Fund Programs to keep subgrantees on track to continually meet standards. Activities included in the monitoring plan will occur on a regular basis and at appropriate times. The following potential activities may be used to assess project progress at the 10%, 30%, 50%, 85%, and 100% funding distribution milestones. These procedures include but are not limited to: frequent surveys, site-visits, risk assessments, desk reviews, and compliance reviews. These procedures are intended to provide necessary information to the Office about progress and setbacks that subgrantees are experiencing. All monitoring procedures will be communicated to subgrantees beforehand through various methods. These methods may include setting up meetings, conducting webinars, publishing regulations online, and direct communication.

[2.16.3 Check Box: Certify that the Eligible Entity will account for and satisfy authorities relating to civil rights and nondiscrimination in the selection of subgrantees.](#)

The FloridaCommerce Office of Broadband will account for and satisfy authorities relating to civil rights and nondiscrimination in the selection of subgrantees.

[2.16.4 Check Box: Certify that the Eligible Entity will ensure subgrantee compliance with the cybersecurity and supply chain risk management requirements on pages 70 - 71 of the BEAD NOFO to require prospective subgrantees to attest that:](#)

#### Cybersecurity

- 1) The prospective subgrantee has a cybersecurity risk management plan (the plan) in place that is either: (a) operational, if the prospective subgrantee is providing service prior to the award of the grant; or (b) ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award;
- 2) The plan reflects the latest version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity (currently Version 1.1) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented;
- 3) The plan will be reevaluated and updated on a periodic basis and as events warrant; and
- 4) The plan will be submitted to the Eligible Entity prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days.

#### Supply Chain Risk Management (SCRM)

- 1) The prospective subgrantee has a SCRM plan in place that is either: (a) operational, if the prospective subgrantee is already providing service at the time of the grant; or (b) ready to be operationalized, if the prospective subgrantee is not yet providing service at the time of grant award;

2) The plan is based upon the key practices discussed in the NIST publication NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations and specifies the supply chain risk management controls being implemented;

3) The plan will be reevaluated and updated on a periodic basis and as events warrant; and

4) The plan will be submitted to the Eligible Entity prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days. The Eligible Entity must provide a subgrantee's plan to NTIA upon NTIA's request.

The FloridaCommerce Office of Broadband will promote subgrantee compliance with the cybersecurity and supply chain risk management requirements on pages 70 - 71 of the BEAD NOFO to require that subgrantees attest that:

#### *Cybersecurity*

1. The prospective subgrantee has a cybersecurity risk management plan (the plan) in place that is either:
  - a. Operational, if the prospective subgrantee is providing service prior to the award of the grant.
  - b. Ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award.
2. The plan reflects the latest version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity (currently Version 1.1) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented.
3. The plan will be reevaluated and updated on a periodic basis and as events warrant.
4. The plan will be submitted to the Office prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Office within 30 days.

#### *Supply Chain Risk Management (SCRM)*

1. The prospective subgrantee has a SCRM plan in place that is either:
  - a. Operational, if the prospective subgrantee is already providing service at the time of the grant.
  - b. Ready to be operationalized, if the prospective subgrantee is not yet providing service at the time of grant award.
2. The plan is based upon the key practices discussed in the NIST publication NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations and specifies the supply chain risk

management controls being implemented.

3. The plan will be reevaluated and updated on a periodic basis and as events warrant.
4. The plan will be submitted to the Office prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days. The Office must provide a subgrantee's plan to NTIA upon NTIA's request.

## 2.17 Volume II Public Comment

---

2.17.1 Text Box: Describe the public comment period and provide a high-level summary of the comments received during the Volume II public comment period and how they were addressed by the Eligible Entity. The response must demonstrate: c. The public comment period was no less than 30 days; and d. Outreach and engagement activities were conducted to encourage feedback during the public comment period.

On November 22, 2023, the Office opened the public comment period for its BEAD Initial Proposal, Volume II. The comment period ran for 30 days. As of December 18, 2023, at 11:30 a.m., the Office has received a total of 34 public comments relating to Volume II: 16 were Volume II specific, and 18 covered both Volumes. Many areas of the plan were addressed, including Challenge Process, Community Anchor Institutions, technology preferences, subgrantee selection process, low-cost pricing thresholds, and many more. There were a variety of different commenters, including internet service providers, labor unions, non-profit organizations, concerned citizens, academics, industry trade groups, and local governments. The Office hosted a webinar on December 7, to provide assistance to the public on how to leave a public comment on either Volume of the Initial Proposal. The Office also provided technical assistance to any commenter who needed it. Public comments were accepted via mail and email, though all of the comments were sent via email.

### **Public comments regarding labor requirements**

The Office received public comments that addressed labor standards and practices in Florida's BEAD Initial Proposal, Volume II. One comment suggested a higher score percentage allocated to labor practice history, and another suggested a higher allocation for the fair labor category in general. Additionally, a comment suggested scoring be shifted away from retroactive labor history, and toward prospective labor practices in the future. A comment also requested more specific and granular scoring criteria for fair labor standards. The Office also received a comment asking for clarification on the definition of locally-hired and ongoing operational workforce. Another commenter suggested applicants be required to disclose information about their workforce plans and practices, and that these plans be considered legally enforceable. One comment suggested a prohibition on out-of-state workers, and another suggested prioritization of a directly-hired workforce.

#### *Office Response:*

With regards to scoring, the NTIA has mandated 75 percent of the score be allocated toward the following three categories: private leverage, affordability, fair labor practices. The Office's scoring matrix for fair labor practices adheres with these guidelines. The Office will require subgrantees to adhere to all fair labor practices in compliance with the BEAD grant award.

### **Public comments regarding Community Anchor Institutions, Multi-Dwelling Units**

The Office received public comments that addressed Community Anchor Institutions and Multi-Dwelling Units (MDUs). One commenter suggested updating the definition of Community Anchor Institution to include HUD-assisted housing organizations, and another suggested including affordable housing and low-income community housing in the definition. It was also recommended that individual units within an MDU each be considered as separate Broadband Serviceable Locations, and that the Office should give higher scores to applicants that lead to property owners rewiring their MDU properties.

#### *Office Response:*

The definition of a Community Anchor Institution will reflect 47 USC 1702(a)(2)E. The Office has opted to incorporate the NTIA modifications for both Multi-Dwelling Units and DSL. This means that any location served exclusively by DSL, MDU or otherwise, will be considered underserved and thus eligible for BEAD funding. Further, any MDU with either three unserved units or 10 percent unserved units will be considered unserved as well. Any MDU connectivity solutions will be determined by the applicant for project areas containing MDUs. With respect to Community Anchor Institution connectivity, the Office will evaluate the individual needs of each community before committing to serve Anchor Institutions as a whole. The Office proposes to dedicate portion of BEAD funds to training and workforce in lieu of deployment to CAIs, contingent on there being reliable and ongoing service to CAIs.

### **Public comments regarding non-deployment activities, affordability, marketing, workforce, non-profit partnerships, community outreach**

The Office received comments that deal with the categories listed above. Several similar comments expressed a desire for the Office to allocate funding for local non-profits to participate in non-deployment activities and workforce programs. This was reiterated by another commenter, who encouraged the Office to engage in robust community outreach efforts and include community organizations in workforce development and training programs. A commenter also requested that the Office consider workforce funding for existing utility identification. A commenter also encouraged the Office to reallocate more points to affordability measures in scoring. Another commenter gave suggestions about broadband adoption and marketing efforts.

#### *Office Response:*

The workforce development portion of the BEAD program will include stakeholder input and community outreach as the plans are designed and implemented. The Office has already engaged in many different outreach activities throughout the state, including statewide listening sessions, the State Broadband Summit, Local Technology Planning Team meetings, Miami Dade College Workforce Summit, interviews with various stakeholders, and many other efforts. Community engagement has been and will remain critical to the Office's efforts. Workforce development is a top priority for the Office in its BEAD plans. The Office anticipates that the state college system will play a major role in these activities, as many apprenticeship programs are already in place throughout the state. The state college system has existing relationships with many non-profit organizations, workforce development boards, and community organizations.

### **Public comments regarding low-cost pricing**

The Office received comments about low-cost pricing. Many of these comments commended the Office for electing not to set a specific price for an applicant's affordable, low-cost option.

#### *Office response:*

The Office is following the requirements laid out in the Infrastructure Investment and Jobs Act (IIJA) with respect to rate regulation. The low-cost option is a requirement of the BEAD program, and providers will need to offer a low-cost option for the duration of the program in order to stay in compliance. The Office will not set a price for the low-cost service option across the state. Prospective subgrantees may submit their proposed pricing structure with their application. However, the Office will require subgrantees to maintain the price-point for their current low-cost option through the duration of the BEAD Program.

### **Public comments regarding the Challenge Process**

The Office received comments addressing the Office's proposed Challenge Process. One comment encouraged the Office to roll out its challenge process in distinct phases, as opposed to concurrent

phases. Another commenter expressed the Office should utilize a streamlined process. Another comment requested prioritization of awards poised for immediate buildout, expressed desire for the prioritization of fiber, and wants 100/100 symmetrical speed standard.

*Office Response:*

The Office's challenge process will employ specific periods for each phase rather than a rolling challenge process. The Office plans to allow for a 30-day challenge window on a consecutive basis rather than a rolling basis. The Office is willing to consider increasing the challenge window to 45 days, while noting that it will add two weeks to the overall challenge process (135 days instead of 120). The timeframe of the challenge process is determined by the approval of the initial proposal. The Office plans to conduct multiple regional challenge process training sessions to ensure eligible challengers have the tools necessary to review and submit challenges appropriately. With the mapping data available, there's no reason to delay the challenge process, and thus the deployment of broadband. The Office will utilize the latest FCC Broadband map available at the time of the challenge process in conjunction with the most current BSL Fabric. The Office will clarify the evidence necessary to challenge a location.

**Public Comments regarding overlapping areas, service areas**

The Office received comments addressing the above categories. One commenter expressed desire for a transparent process for deconflicting overlapping awards and provided recommendations for a pre-qualification process. Additionally, the commenter wants service providers to design their own project areas, recommends small project areas built at the census block level.

Another commenter encourages the Office to establish rules making it difficult for providers to redefine service areas to exclude high-cost areas. They also recommend setting the definition of service areas in advance.

*Office Response:*

The Office has chosen to design its own service areas for the BEAD program in order to discourage providers from cherry picking low-cost areas, while leaving the high-cost areas without reliable service. The Office is committed to bundling low-cost and high-cost locations into each proposed service area, allowing for more cost-efficient buildout while emphasizing serving the state's most rural and unserved residents. Establishing service areas in advance also allows the Office to reduce the possibility of overlapping locations and decrease the likelihood of duplication. With respect to RDOF, under existing guidance the state cannot serve locations with an existing service commitment, including RDOF. The state's RDOF scoring criteria is meant to encourage RDOF awardees to begin their projects sooner rather than later, and hopefully avoid default. BEAD funding cannot be used to supplement a committed RDOF area, which would be in violation of the rules of the RDOF program.

**Public comments regarding technology preference, extremely high-cost threshold, mobile broadband, speed criteria**

The Office received comments related to the categories listed above. With regards to technology preference, comments were divided. Some expressed a desire for fiber to be prioritized and for this preference to be reflected in the scoring of applications. Others expressed appreciation for the Office for remaining technology neutral. For the extremely high-cost threshold (EHCT), one commenter provided caution against the EHCT being too low, and another against the EHCT being too high. For mobile broadband, the Office received one comment which expressed desire for recognition of mobile broadband. Lastly, for speed criteria, some commenters recommended that the criteria be reformatted to emphasize speed of deployment. There has also been desire from three commenters for the Office to align with a 100/100 Mbps symmetrical speed standard.

*Office Response:*

The Office wants to provide all Floridians with access to broadband services. To do so, Florida will continue to be technology neutral and consider solutions such as fixed wireless and satellite, provided they adhere to minimum standards required in the Infrastructure Act. Volume II will separately address the remainder of the 20 requirements, including a description of the BEAD application process, non-deployment activities and workforce initiatives.

To set the EHCT, the Office will collect information from four sources: project costs from previous broadband grant programs in Florida, Eligible Entity Planning Toolkit, BEAD deployment subgrantee applications, and Line Extensions and Alternate Technologies.

The principal focus for the BEAD Program is to deploy broadband service to unserved locations (those without broadband service or service offering speeds less than 25 megabits per second (Mbps) download and 3 Mbps upload), and underserved locations (those without broadband service offering speeds of 100 Mbps download and 20 Mbps upload).

**Public comments regarding subgrantee selection process, scoring process, network resiliency, environmental impact, letter of credit, scalability**

The Office received comments that addressed the above areas. Multiple comments recommend the Office include a pre-qualification process for prospective subgrantees. It was also suggested the Office utilize measurement of known benchmarks to prevent predatory lowball bids. Another commenter requested an application curing process. Another comment expressed a desire for an alternative financial requirement to the letter of credit. Another comment encouraged emphasizing a scoring criterion which rewards speed to deployment. This was echoed by another commenter, who recommended prioritization of awards poised for immediate buildout. Another comment requested clarification on the speed to deployment criteria. It was also suggested that the Office require fiber builds to include access points allowing for interconnection over time. Network management, including technical support, was also suggested as a potential category for scoring. There was also a comment suggesting scoring incentives for women/minority owned businesses. Several comments suggested a preference for fiber be reinforced in the scoring criteria. One commenter stressed the importance of evaluating environmental impact. In addition, one commenter expressed concern about scalability in relation to inclusion efforts.

*Office Response:*

The Office intends to conduct a pre-eligibility registration period during which time an applicant's eligibility will be assessed. Qualifying documentation to show an applicant's management, deployment, and financial capability will be required during the application cycle. The Office has utilized this process during both the Broadband Opportunity Program and the Capital Projects Fund. It is possible for the Office to adjust scoring criteria, but the 75 percent scoring allocation required by NTIA limits the Office's options for scoring criteria. With such a large amount allocated to the top three scoring categories, the impact of changes to scoring criteria will be comparatively minimal. NTIA has made some concessions regarding the Letter of Credit requirement. Awardees may now select a performance bond in lieu of the Letter of Credit and if accepting a reimbursement agreement may lower the amount of the bond when reaching agreed-upon milestones. With that said, Letter of Credit and performance bond requirements are established through guidance by the NTIA and the Office will comply with those requirements.

**Public comments regarding monitoring/compliance**

The Office received comments regarding monitoring/compliance. These comments suggested that the post-application process should be verified via comprehensive monitoring to ensure that program



guidelines are being upheld. The monitoring procedures recommended include site visits, disclosure of workforce plans, and considering workforce plans legally binding.

*Office Response:*

The Office believes in a fully compliant BEAD program. As such, the Office intends to use a robust set of procedures for compliance and monitoring to fully abide by program guidelines, many of which the Office has successfully integrated through its Broadband Opportunity and Capital Projects Fund Programs. In accordance with 2 C.F.R. Part 200, including 2 C.F.R. Parts 200.300-309 and 2 C.F.R. Parts 200.328-330, and other regulations applicable to the BEAD Program, as well as sections 112.311 and 218.33, Florida Statutes, the Office will monitor its subgrantees throughout the project lifecycle for adherence to administrative, civil rights, financial management, and auditing requirements.

2.17.2 Optional Attachment: As an optional attachment, submit supplemental materials to the Volume II submission and provide references to the relevant requirements. Note that only content submitted via text boxes, certifications, and file uploads in sections aligned to Initial Proposal requirements in the NTIA Grants Portal will be reviewed, and supplemental materials submitted here are for reference only.

## 2.18 Appendix I

### 1. Local Coordination Tracker

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Dixie County Local Technology Planning Team	Virtual	Dixie County Local Technology Planning Team	Statewide Engagement	All counties	25
Florida Agricultural and Mechanical University Meeting	Virtual	Met with IT leaders of local HBCU	Local	Leon	*
National Digital Inclusion Alliance Call	Virtual	Meeting with Digital Adoption and Use non-profit organization	Local	All counties	*
Education Superhighway meeting	Virtual	Education Superhighway, a non-profit, Digital Adoption and Use organizations	Statewide Engagement	All counties	*
City of Palatka Technical Assistance	Virtual	Provided technical and grant assistance to local leaders with the City of Palatka	Local	Putnam	1
Dixie County Local Technology Planning Team	Virtual	Dixie County Local Technology Planning Team	Local	Dixie	25
Cities of Archer and Greenville Technical Assistance	Virtual	Provided technical and grant assistance to local leaders with the Cities of Archer and Greenville	Local	Alachua, Madison	2
Seminole Tribe of Florida Meeting	Virtual	Met with Seminole Tribe IT department leader	Local	Seminole Tribal Lands	1

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
FL Department of Agriculture and Consumer Services	Virtual	Meeting with interagency partners at Florida Department of Agriculture and Consumer Services	Statewide Engagement	All counties	*
City of Oldsmar Technical Assistance	Virtual	Assisted with technical and grant application questions with City of Oldsmar officials	Local	Pinellas	*
Florida's Adult and Family Literacy Resource Center Meeting	Virtual	Meeting with organization representing English language learners and individuals with low levels of literacy	Statewide Engagement	All counties	1
The Learning Alliance Meeting	Virtual	Meeting with for-profit entity training individuals for careers in fiber and wireless installation	Statewide Engagement	All counties	2
Dixie County Local Technology Planning Team	Virtual	Dixie County Local Technology Planning Team	Local	Dixie	25
Education SuperHighway ACP and Apartment WiFi Call	Virtual	Meeting with non-profit group regarding ACP enrollment and other Digital Adoption and Use issues	Statewide Engagement	All counties	*
Dixie County Local Technology Planning Team	Virtual	Dixie County Local Technology Planning Team	Local	Dixie	25
Dr. Mark Jamison/Public Utility Research Center Meeting	Tallahassee, FL	University of Florida Public Utility/Infrastructure	Statewide Engagement	All counties	1

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
		Researcher			
FL Agency for Healthcare Administration Meeting	Virtual	FL Agency for Healthcare Administration Leaders	Statewide Engagement	All counties	*
Alachua County Local Technology Planning Team Technical Assistance	Virtual	Alachua County Local Technology Planning Team Leaders	Local	Alachua	*
Communications Workers of America Meeting	Virtual	Communications Workers of America Labor Leaders	Statewide Engagement	All counties	2
Liberty County Local Technology Planning Team Assistance	Virtual	Liberty County Local Technology Planning Team	Local	Liberty	2
Dixie County Local Technology Planning Team	Virtual	Dixie County Local Technology Planning Team	Local	Dixie	*
Alachua County Local Technology Planning Team	Virtual	Alachua County Local Technology Planning Team	Local	Alachua	*
Monthly Local Technology Planning Team Leader Call	Virtual	Local Technology Planning Team Leaders	Statewide Engagement	All counties	*
Leon County Local Technology Planning Team Assistance	Tallahassee, FL	Leon County Local Technology Planning Team	Local	Leon	2
Town of Micanopy technical assistance meeting	Virtual	Town of Micanopy	Local	Alachua	*
Highlands County Local Technology Planning Team	Virtual	Highlands County Local Technology Planning Team	Local	Highlands	*

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Duval County Local Technology Planning Team	Virtual	Duval County Local Technology Planning Team	Local	Duval	*
Broward County Local Technology Planning Team	Virtual	Broward County Local Technology Planning Team	Local	Broward	*
REACH Office Meeting	Tallahassee, FL	FL Reach Office workforce personnel	Statewide Engagement	All counties	1
St. Lucie County Local Technology Planning Team Assistance Meeting	Virtual	St. Lucie County Local Technology Planning Team	Local	St. Lucie	2
Franklin County Local Technology Planning Team	Virtual	Franklin County Local Technology Planning Team	Local	Franklin	*
Liberty County Local Technology Planning Team	Bristol, FL	Liberty County Local Technology Planning Team	Local	Liberty	9
Lake County Local Technology Planning Team	Virtual	Lake County Local Technology Planning Team	Local	Lake	*
FL Digital Services Meeting	Virtual	FL state agency cybersecurity personnel	Statewide Engagement	All counties	3
AmeriCorps Meeting	Virtual	AmeriCorps / Lead for America Volunteers	Statewide Engagement	All counties	3
Hillsborough County Local Technology Planning Team	Virtual	Hillsborough County Local Technology Planning Team	Local	Hillsborough	Requested attendance sheet
Bradford County Local Technology Planning Team	Virtual	Bradford County Local Technology Planning Team	Local	Bradford	*
Dixie County Local Technology Planning Team	Virtual	Dixie County Local Technology Planning Team	Local	Dixie	25

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
St. Lucie County Commission meeting	Tallahassee, FL	St. Lucie County leadership	Local	St. Lucie	*
Monthly Local Technology Planning Teams Leader Call	Virtual	Local Technology Planning Team Leaders	Statewide Engagement	All counties	*
Marion County Local Technology Planning Team	Virtual	Marion County Local Technology Planning Team	Local	Marion	*
Town of Micanopy technical assistance meeting	Virtual	Town of Micanopy	Local	Alachua	*
Putnam County Local Technology Planning Team	Palatka, FL	Putnam County Local Technology Planning Team	Local	Putnam	Approximately 10
Gulf County Local Technology Planning Team	Virtual	Gulf County Local Technology Planning Team	Local	Gulf	17
Bradford County Local Technology Planning Team	Starke, FL	Bradford County Local Technology Planning Team	Local	Bradford	16
Alachua, Gilchrist, and Union County Local Technology Planning Teams	Newberry, FL	Alachua, Gilchrist, and Union County Local Technology Planning Team	Local	Alachua, Gilchrist, and Union Counties	19
Lake County Local Technology Planning Team	Virtual	Lake County Local Technology Planning Team	Local	Lake	20
Hardee County Local Technology Planning Team	Wauchula, FL	Hardee County Local Technology Planning Team	Local	Hardee	6
Jackson County Local Technology Planning Team	Marianna, FL	Jackson County Local Technology Planning Team	Local	Jackson	10

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Volusia County Local Technology Planning Team	Virtual	Volusia County Local Technology Planning Team	Local	Volusia	19
Marion County Local Technology Planning Team	Ocala, FL	Marion County Local Technology Planning Team	Local	Marion	8
Santa Rosa County Local Technology Planning Team	Milton, FL	Santa Rosa County Local Technology Planning Team	Local	Santa Rosa	21
Seminole County Local Technology Planning Team	Virtual	Seminole County Local Technology Planning Team	Local	Seminole	50
Dixie County Local Technology Planning Team	Cross City, FL	Dixie County Local Technology Planning Team	Local	Dixie	6
Monthly LTPT Call	Virtual	Florida Local Technology Planning Team Leaders	Statewide Engagement	All counties	*
Gadsden County Local Technology Planning Team	Quincy, FL	Gadsden County Local Technology Planning Team	Local	Gadsden	4
Communications Services for the Deaf	Virtual	Deaf digital service providers	Statewide Engagement	All counties	2
Flagler County Local Technology Planning Team	Bunnell, FL	Flagler County Local Technology Planning Team	Local	Flagler	1
Clay County Local Technology Planning Team	Virtual	Clay County Local Technology Planning Team	Local	Clay	31
National Skills Coalition	Virtual	Digital Skills Coalition	Statewide Engagement	All counties	2
Martin County Local Technology Planning Team	Stuart, Florida	Martin County Local Technology Planning Team	Local	Martin	10

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Lead for America	Virtual	Lead for America/ Americorps volunteers	Statewide Engagement	All counties	2
FL Agency for Healthcare Administration	Virtual	FL Healthcare Agency staff	Statewide Engagement	All counties	3
Miami Dade County Local Technology Planning Team	Virtual	Miami Dade County Local Technology Planning Team	Local	Miami Dade County	35
Hernando County Local Technology Planning Team	Brooksville, FL	Hernando County Local Technology Planning Team	Local	Hernando	12
Florida Hispanic Federation	Virtual	Hispanic Community Leaders	Statewide Engagement	All counties	3
Escambia County Local Technology Planning Team	Virtual	Escambia County Local Technology Planning Team	Local	Escambia	11
Lee County Local Technology Planning Team	Fort Myers, FL	Lee County Local Technology Planning Team	Local	Lee	14
Digitunity Call	Virtual	Device policy leaders	Statewide Engagement	All counties	2
Monthly Local Technology Planning Team Call	Virtual	Local Technology Planning Team Leaders	Statewide Engagement	All counties	*
Polk County Local Technology Planning Team	Virtual	Polk County Local Technology Planning Team	Local	Polk	18
South Florida Regional Planning Council	Virtual	Eralda Agolli, South Florida Regional Planning Council	Regional	South Florida	1



Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
St. Lucie County Local Technology Planning Team	Fort Pierce, FL	St. Lucie Local Technology Planning Team	Local	St. Lucie	30
DeSoto County Local Technology Planning Team	Virtual	DeSoto County Local Technology Planning Team	Local	DeSoto	16
Calhoun County Local Technology Planning Team	Blountstown, FL	Calhoun County Local Technology Planning Team	Local	Calhoun	12
Monroe County Local Technology Planning Team Lead	Virtual	Alan MacEachern, Monroe County Local Technology Planning Team Lead	Local	Monroe	1
Agency for Healthcare Administration	Virtual	Agency for Healthcare Administration leaders regarding Community Anchor Institution definitions	Statewide Engagement	All counties	3
Franklin County Local Technology Planning Team Lead	Virtual	Cortni Bankston, Franklin County Local Technology Planning Team Lead	Local	Franklin	1
Highlands County Local Technology Planning Team	Avon Park, FL	Highlands County Local Technology Planning Team	Local	Highlands	N/A
Escambia County Local Technology Planning Team	Pensacola, FL	Escambia County Local Technology Planning Team	Local	Escambia	12
City of Lady Lake	Virtual	John Pearl, City of Lady Lake	Local	Lake	2

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
St. Lucie County Local Technology Planning Team	Virtual	St. Lucie Local Technology Planning Team	Local	St. Lucie	30
Duval County Local Technology Planning Team	Virtual	Duval County Local Technology Planning Team	Local	Duval	35
ByteBack	Virtual	ByteBack Digital Navigator Program managers	Local	Miami Dade	3
Citrus County Local Technology Planning Team	Virtual	Citrus County Local Technology Planning Team	Local	Citrus	18
Gadsden County Local Technology Planning Team Technical Assistance	Virtual	Gadsden County Local Technology Planning Team Technical Assistance	Local	Gadsden	1
Broadband/DoE Questionnaire	Virtual	FL Department of Education Leaders to discuss data gathering methods for school districts regarding Digital Adoption and Use efforts	Statewide Engagement	All counties	2
Monthly Broadband Multi-Agency Coordination Call	Virtual	State agency leaders meeting to coordinate broadband efforts across state government	Statewide Engagement	All counties	30
FAC Annual Conference	Orlando	Office of Broadband Director Katie Smith gave presentation to county level leaders about future broadband	Statewide Engagement	All counties	60

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
		funding opportunities			
Bradenton Digital Adoption and Use Workshop	Bradenton	Bradenton/ Manatee County Local leaders, service providers, non-profits and concerned citizens	Local	Manatee	25
Town of Eatonville Technical Assistance Call	Virtual	Town of Eatonville local leaders discussing future funding opportunities	Local	Orange	2
Sondra Guffey Interview	Virtual	Interview with Sondra Guffey, DeSoto county Local Technology Planning Team lead regarding DeSoto County Digital Adoption and Use issues	Local	DeSoto	1
AARP Interview	Virtual	Interview with local AARP leaders regarding Digital access issues affecting seniors throughout the state	Statewide Engagement	All counties	3
Seniors on a Mission Meeting	Virtual	Discussion with Jacksonville non-profit to discuss innovative digital navigator program	Local	Duval	1
Florida League of Cities Call	Virtual	Discussion with Chris Holley and staff regarding League of City broadband policies	Statewide Engagement	All counties	2

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
FL Department of Education Interview, Dr. Paul Burns	Virtual	Interview with Dr. Paul Burns, k-12 Chancellor at the FL Department of Education regarding broadband and Digital Adoption and Use issues in K-12 education	Statewide Engagement	All counties	1
Lake County Local Technology Planning Team	Virtual	Lake County Local Technology Planning Team	Local	Lake	15
Taylor County Broadband Workshop	Perry, FL	Discussion with Taylor County elected officials, non-profits, device providers, and concerned citizens regarding Digital Adoption and Use issues	Local	Taylor	25
Cyber Florida, University of South Florida	Virtual	Discussion of digital navigator pilot program with Cyber Florida	Statewide Engagement	All counties	3
Seminole Tribe Meeting	*	*	*	*	
United Way of Florida Interview	Virtual	Digital Adoption and Use discussion with United Way of Florida	Statewide Engagement	All counties	1
NextEra Energy Interview	Virtual	Digital Adoption and Use and infrastructure discussion with NextEra Energy	Statewide Engagement	All counties	4

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
FL Division of Library Services	Virtual	Digital Adoption and Use Discussion with FL Division of Library Services	Statewide Engagement	All counties	1
Miccosukee Tribe Meeting	*	*	*	*	
Florida Chamber of Commerce Interview	Virtual	Digital Adoption and Use Discussion with Florida Chamber of Commerce	Statewide Engagement	All counties	4
Escambia County Local Technology Planning Team	Virtual	Escambia County Local Technology Planning Team	Local	Escambia	11
Virtual Public Workshop #1	Virtual	Virtual Workshop regarding Digital Adoption & Use and BEAD 5-year action plan with opportunities for public comment	Statewide Engagement	All counties	85
Communications Workers of America Interview	Virtual	Digital Adoption and Use Interview with Communications Workers of America	Statewide Engagement	All counties	2
Hispanic Federation Interview	Virtual	Digital Adoption and Use Interview with Hispanic Federation	Statewide Engagement	All counties	5
Polk County Technical Assistance Meeting	Virtual	Technical/Grant Administration meeting with Polk County leaders	Local	All counties	2
Marion County Local Technology Planning Team	Virtual	Marion County Local Technology Planning Team	Local	Marion	8

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Nassau County Local Technology Planning Team	Yulee, Florida	Nassau County Local Technology Planning Team	Local	Nassau	15
Wireless Infrastructure Association Interview	Virtual	Digital Adoption and Use Interview with Wireless Infrastructure Association	Statewide Engagement	All counties	1
Florida League of Cities Call	Virtual	Call with Florida League of Cities regarding broadband report for League of Cities members	Statewide Engagement	All counties	4
Monthly Broadband Multi-Agency Coordination Call	Virtual	State agency leaders meeting to coordinate broadband efforts across state government	Statewide Engagement	All counties	30
Florida Internet and Television Interview	Virtual	Digital Adoption and Use Discussion with statewide service provider trade association	Statewide Engagement	All counties	2
OIC of South Florida Interview	Virtual	Digital Adoption and Use Discussion with OIC of South Florida, a workforce/job training organization	Statewide Engagement	All counties	3
Monthly Local Technology Planning Team Leaders Call	Virtual	Florida Local Technology Planning Team Leaders	Statewide Engagement	All counties	60
Florida		Digital Adoption and Use Discussion with Florida Telecommunicat	Statewide		

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Telecommunications Relay Interview	Virtual	ions Relay, a company providing devices to deaf and hard of hearing persons in Florida	Engagement	All counties	1
Digital Inclusion St. Pete Technical Assistance Call	Virtual	Technical. Grant Assistance call with Digital Inclusion St. Pete, a local digital access organization	Local	Pinellas	2
Virtual Public Workshop #2	Virtual	Virtual Workshop regarding Digital Adoption & Use and BEAD 5-year action plan with opportunities for public comment	Statewide Engagement	All counties	89
Capital Projects Fund - Multi-Purpose Community Facilities Technical Assistance Webinar	Virtual	Technical Assistance Webinar regarding Multi-Purpose Community Facilities Grant	Statewide Engagement	All counties	*
Florida Division of Emergency Management Interview	Virtual	Digital Adoption and Use Discussion with Florida Division of Emergency Management	Statewide Engagement	All counties	2
Monthly Broadband Multi-Agency Coordination Call	Virtual	State agency leaders meeting to coordinate broadband efforts across state government	Statewide Engagement	All counties	30
Florida League of Cities Call	Virtual	Call with Florida League of Cities regarding broadband report for League of Cities members	Statewide Engagement	All counties	3

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Union County Local Technology Planning Team	Lake Butler, Florida	Union County Local Technology Planning Team	Local	Union	17
Virtual Public Workshop #3	Virtual	Virtual Workshop regarding Digital Adoption & Use and BEAD 5-year action plan with opportunities for public comment	Statewide Engagement	All counties	64
Glades County Local Technology Planning Team	Moore Haven, FL	Glades County Local Technology Planning Team	Local	Glades	11
Cyber Florida, University of South Florida	Virtual	Digital Navigator planning meeting	Statewide Engagement	All counties	8
Miccosukee Tribe Meeting	Virtual	Grant Technical Assistance with Miccosukee Tribe	Local	Miccosukee Tribe	7
FL Board of Governors Interview	Virtual	Digital Adoption and Use Conversation with Board of Governors of State University System	Statewide Engagement	All counties	2
Levy County Local Technology Planning Team	Virtual	Levy County Local Technology Planning Team	Local	Levy	15
Florida League of Cities Call	Virtual	Call with Florida League of Cities regarding broadband report for League of Cities members	Statewide Engagement	All counties	4
Central Florida Internet Authority Technical Assistance	Virtual	Technical Assistance call with Central Florida Internet authority, prospective local provider	Local	Lake	1



Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
The Patterson Foundation Interview	Virtual	Digital Adoption and Use Conversation with The Patterson Foundation	Local	Sarasota	1
Miami-Dade Local Technology Planning Team	Virtual	Miami-Dade Local Technology Planning Team Meeting	Local	Dade	35
FL Department of Transportation Interview	Virtual	Digital Adoption and Use Conversation with FL Department of Transportation	Statewide Engagement	All counties	2
Escambia County Local Technology Planning Team	Virtual	Escambia County Local Technology Planning Team	Local	Escambia	10
Santa Rosa County Local Technology Planning Team Leader Interview	Virtual	Digital Adoption and Use Conversation with Santa Rosa County	Local	Santa Rosa	1
FL Developmental Disabilities Council Interview	Virtual	Digital Adoption and Use Conversation with FL Developmental Disabilities Council	Statewide Engagement	All counties	1
DeSoto County Local Technology Planning Team	Arcadia, FL	DeSoto County Local Technology Planning Team	Local	DeSoto	10
Monthly Broadband Multi-Agency Coordination Call	Virtual	State agency leaders meeting to coordinate broadband efforts across state government	Statewide Engagement	All counties	30
FL Library Association Interview	Virtual	Digital Adoption and Use Conversation with FL Library	Statewide Engagement	All counties	1

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
		Association			
FL Municipal Electric Association Interview	Virtual	Digital Adoption and Use Conversation with FL Municipal Electric Association	Statewide Engagement	All counties	3
Dixie County Local Technology Planning Team	Virtual	Dixie County Local Technology Planning Team	Local	Dixie	5
Polk County Local Technology Planning Team	Winter Haven, FL	Polk County Local Technology Planning Team	Local	Polk	13
Monthly Local Technology Planning Team Leaders Call	Virtual	Florida Local Technology Planning Team Leaders	Statewide Engagement	All counties	60
Aeras Foundation Interview	Virtual	Digital Adoption and Use Conversation with the Aeras Foundation	Local	Orange	2
Polk County Local Technology Planning Team Leader Interview	Virtual	Digital Adoption and Use Conversation with Polk County Local Technology Planning Team Lead	Local	Polk	1
Florida Ready to Work Meeting	Virtual	Workforce and Digital Literacy Conversation with Florida Ready to Work	Statewide Engagement	All counties	1
Marion County Local Technology Planning Team	Virtual	Marion County Local Technology Planning Team	Local	Marion	15

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Marion County Local Technology Planning Team Leader Interview	Virtual	Digital Adoption and Use Conversation with Marion County Local Technology Planning Team Leader	Local	Marion	1
Dense Networks Interview	Virtual	Digital Adoption and Use Conversation with Dense Networks	Local	Orange, Levy, Lake	1
Palm Beach County Mapping Technical Assistance	Virtual	Mapping Technical Assistance Call with Palm Beach County IT Leadership	Local	Palm Beach	2
FloridaCares Interview	Virtual	Digital Adoption and Use Conversation with FloridaCares	Statewide Engagement	All counties	1
Comcast Interview	Virtual	Digital Adoption and Use Conversation with Comcast	Statewide Engagement	All counties	4
AT&T Interview	Virtual	Digital Adoption and Use Conversation with AT&T	Statewide Engagement	All counties	1
FL Coalition for Black Civic Participation Meeting	Virtual	Meeting and Introduction with Leaders from the Coalition for Black Civic Participation	Statewide Engagement	All counties	4
Conexon Interview	Virtual	Digital Adoption and Use Conversation with Conexon	Statewide Engagement	All counties	2
Lake County Local Technology Planning Team	Virtual	Lake County Local Technology Planning Team	Local	Lake	17

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Charter Communications Interview	Virtual	Digital Adoption and Use conversation with Charter Communications	Statewide Engagement	All counties	6
Polk County Local Technology Planning Team	Auburndale, FL	Polk County Local Technology Planning Team	Local	Polk	22
Osceola County Local Technology Planning Team	Virtual	Osceola County Local Technology Planning Team	Local	Osceola	12
Okaloosa County Local Technology Planning Team	Shalimar, FL	Okaloosa County Local Technology Planning Team	Local	Okaloosa	2
Florida Broadband Summit	Orlando, FL	Statewide summit hosted by the Office of Broadband featuring leaders from the telecommunications industry as well as state and local government partners	Statewide Engagement	All counties	300
Dixie County Local Technology Planning Team	Virtual	Dixie County Local Technology Planning Team	Local	Dixie	4
Union County Local Technology Planning Team	Virtual	Union County Local Technology Planning Team	Local	Union	9
Florida Sheriff's Association Interview	Virtual	Digital Adoption and Use Conversation with Florida Sheriff's Association	Statewide Engagement	All counties	1
Levy County Local Technology Planning Team	Bronson, Florida	Levy County Local Technology Planning Team	Local	Levy	15

Engagement Title	Engagement Location	Target Audience	Target Audience Location	Target Audience County	# Engaged
Florida Coalition on Black Civic Participation Technical Assistance Call	Virtual	Answered questions about grants and general Office function with members of Florida Coalition on Black Civic Participation	Statewide Engagement	All counties	3
Broadband Workforce Roundtable	Miami, FL	Workforce Roundtable discussion with industry and local leaders in Miami	Statewide Engagement	All counties	10

## 2. Florida Federally Recognized Tribes

1. [Seminole Tribe of Florida Meeting Agenda](#)
2. [Seminole Tribal of Florida Engagement Presentation](#)
3. [Seminole Tribe of Florida Questionnaire](#)
4. [Miccosukee Tribe of Indians of Florida Meeting Agenda](#)
5. [Miccosukee Tribe of Indians of Florida Engagement Presentation](#)
6. [Miccosukee Tribe of Indians of Florida Questionnaire](#)

## 3. Dear Tribal Leader Letter

### *Miccosukee Tribe Letter*

Dear Honorable Tribal Leader:

On behalf of the State of Florida, I would like to initiate a Tribal Consultation on the Broadband, Equity, Access, and Deployment (BEAD) Program. The Broadband, Equity, Access, and Deployment (BEAD) Program (Program), authorized by the Infrastructure Investment and Jobs Act of 2021 (IIJA), Division F, Title I, Section 601012, Public Law 117-58, 135 State. 429 (November 15, 2021) (Infrastructure Act or Act) also known as the Bipartisan Infrastructure Law, provides federal funding of \$4245 billion for grants to Eligible Entities for broadband planning, deployment, mapping, equity, and adoption activities.

The Program's principal focus will be on deploying broadband service to unserved locations (those without any broadband service at all or with broadband service offering speeds below 25 megabits per second (Mbps) downstream/3 Mbps upstream) and underserved locations (those without broadband service offering speeds of 100 Mbps downstream/200 Mbps upstream). The U.S. Department of Commerce and National Telecommunications and Information Administration (NTIA) is dedicated to expanding broadband deployment in unserved areas and promoting digital inclusion.

The State of Florida is committed to holding Consultation expeditiously to ensure the inclusion of our Tribal partners in funding from the IIJA. Following the Department of Commerce's Tribal consultation policy, I am inviting you and/or a Tribal representative with your delegation of authority to participate in this in-person or virtual Tribal Consultation to secure your participation in this Program.

I respectfully request your participation at the in-person Tribal Consultation session:

Thursday, July 13, 2023  
9:00 a.m.  
500 SW 177th Ave.  
Miami, FL 33194

The BEAD Program will provide funding for the following:

- Broadband Infrastructure Development
- Affordable broadband programs, including:
  - Preventing disconnection of existing broadband services
  - Providing free or reduced cost broadband
- Distance learning
- Telehealth
- Digital inclusion efforts
- Broadband adoption activities

If you have any questions regarding the BEAD Program or these consultation sessions, please reach out to Katie Smith (Katie.Smith@DEO.MyFlorida.com) at 850-717-8445. I look forward to our continued consultation and government-to-government engagement with Tribal leaders who are working to close the digital divide in Indian Country. Thank you for your attention to this matter.

Sincerely,

J. Alex Kelly  
Secretary  
Florida Department of Economic Opportunity

#### *Overview of Miccosukee Consultation*

- Most residents have no Internet connection besides a cellular connection
- There is a desire to bring reliable Internet to the tribe via fiber and get to members educated about the Internet
- There is fiber in certain administration buildings but not everywhere else
- Weather events and topography can make it difficult to access reliable Internet

#### *Seminole Tribe Letter*

Dear Honorable Tribal Leader:

On behalf of the State of Florida, I would like to initiate a Tribal Consultation on the Broadband, Equity, Access, and Deployment (BEAD) Program. The Broadband, Equity, Access, and Deployment (BEAD) Program (Program), authorized by the Infrastructure Investment and Jobs Act of 2021 (IIJA), Division F, Title I, Section 601012, Public Law 117-58, 135 State. 429 (November 15, 2021) (Infrastructure Act or Act) also known as the Bipartisan Infrastructure Law, provides federal funding of \$4245 billion for grants to Eligible Entities for broadband planning, deployment, mapping, equity, and adoption activities.

The Program's principal focus will be on deploying broadband service to unserved locations (those without any broadband service at all or with broadband service offering speeds below 25 megabits per second (Mbps) downstream/3 Mbps upstream) and underserved locations (those without broadband service offering speeds of 100 Mbps downstream/200 Mbps upstream). The U.S. Department of Commerce and National Telecommunications and Information Administration (NTIA) is dedicated to

expanding broadband deployment in unserved areas and promoting digital inclusion.

The State of Florida is committed to holding Consultation expeditiously to ensure the inclusion of our Tribal partners in funding from the IIJA. Following the Department of Commerce's Tribal consultation policy, I am inviting you and/or a Tribal representative with your delegation of authority to participate in this in-person or virtual Tribal Consultation to secure your participation in this Program.

I respectfully request your participation at the in-person Tribal Consultation session:

Wednesday, July 12, 2023

2:00-4:30 p.m.

Seminole Tribe of Florida Headquarters

6300 Stirling Rd

Hollywood, FL 33024

The BEAD Program will provide funding for the following:

- Broadband Infrastructure Development
- Affordable broadband programs, including:
  - Preventing disconnection of existing broadband services
  - Providing free or reduced cost broadband
- Distance learning
- Telehealth
- Digital inclusion efforts
- Broadband adoption activities

If you have any questions regarding the BEAD Program or these consultation sessions, please reach out to Katie Smith (Katie.Smith@DEO.MyFlorida.com) at 850-717-8445. I look forward to our continued consultation and government-to-government engagement with Tribal leaders who are working to close the digital divide in Indian Country. Thank you for your attention to this matter.

Sincerely,

J. Alex Kelly

Secretary

Florida Department of Economic Opportunity

#### *Overview of Seminole Consultation*

- Many people live in rural tribal areas that are scarcely populated, which makes it difficult for members to receive service
- Majority of members are unserved, up to 95% in rural areas
- Interest in building out their own ISP
- ISPs are currently servicing tribal government buildings
- Current infrastructure in place is not serving them the way they need

#### **4. BEAD Budget Overview**

In 2023, the State of Florida was allocated more than \$1.16 billion (\$1,169,947,392.70) through the federal Broadband Equity, Access, and Deployment (BEAD) program to facilitate the expansion of broadband Internet infrastructure and service access across the state, as well as funds for broadband planning, mapping, and non-deployment activities relating to workforce development and adoption.

The following “State of Florida BEAD Cost Allocation Table” provides a high-level overview of the proposed budget to support these priorities.

Following approval of the state’s Initial Proposal, which is estimated to occur in late 2024, the state will enter into a grant agreement with NTIA. Once the grant agreement is secured, the state will have approximately six years to expend the funds. The year-by-year timeline provided below is subject to change dependent on final NTIA approvals.



State of Florida BEAD Cost Allocation Table

Programmatic Costs	Total	2024	2025	2026	2027	2028	2029	Part of 2% Administration Cap (Yes/No)
<b>DEPLOYMENT ACTIVITIES</b>								
<b>Deployment to Low-Income Locations</b> (Census Data Low-Income)  <i>Note: May begin following completion of the challenge process</i>	\$103,886,932	\$10,388,693	\$10,388,693	\$24,240,284	\$24,240,284	\$24,240,284	\$10,388,694	No
<b>Deployment to Unserved /Underserved Locations</b> (NTIA requirement)  <i>Note: Broadband deployment activities including service unserved/underserved locations, line extensions, high-cost locations, multi-dwelling units</i>	667,695,999	\$66,769,600	\$66,769,600	\$155,795,733	\$155,795,733	\$155,795,733	\$66,769,600	No
<b>Deployment on Tribal Lands</b>  <i>Note: State of Florida is prioritizing</i>	\$200,000,000	\$20,000,000	\$20,000,000	\$46,666,667	\$46,666,667	\$46,666,666	\$20,000,000	No

<i>deployment of broadband internet infrastructure in coordination with federally recognized tribes; the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida.</i>								
<b>Deployment Activities Total = \$971,582,931</b>								
<b>NON-DEPLOYMENT ACTIVITIES</b>								
<b>Workforce Development</b>  <i>Note: Workforce development is mission critical to supporting deployment of broadband internet infrastructure. The Office will provide competitive grant opportunities to state colleges, local workforce development boards, and local community organizations to help facilitate curriculums, training, and apprenticeships.</i>	\$110,000,000	\$20,000,000	\$50,000,000	\$40,000,000				No

<b>Cybersecurity and Digital Literacy Grants</b>  <i>Note: Will help ensure community based organizations may competitively apply for funds supporting cybersecurity and digital literacy efforts at a local level as deployment activities are underway.</i>	\$30,000,000	\$5,000,000	\$5,000,000	\$5,000,000	\$5,000,000	\$5,000,000	\$5,000,000	No
<b>Contractors for subrecipient assistance</b>  <i>Note: Includes intake, review and scoring of applications. Contractor to perform monitoring and compliance of program and subrecipients, and the challenge process.</i>	\$40,180,000	\$6,696,666	\$6,696,667	\$6,696,667	\$6,696,666	\$6,696,667	\$6,696,667	No
<b>Non-Deployment Activities Total = \$180,180,000</b>								
<b>ADMINISTRATION COSTS</b>								
<b>Personnel</b>  <i>Note: Salaries and benefits for office staff to administer the</i>	\$6,936,737	\$935,857	\$981,399	\$1,030,295	\$1,081,814	\$1,852,330	\$1,055,042	Y e s

<i>grant program 11 FTE and 5 OPS.</i>								
Office support  <i>Note: Office supplies and travel to NTIA sponsored workshops twice annually and for monitoring site visits for high-risk subrecipients.</i>	\$214,576	\$12,796	\$40,358	\$40,358	\$40,358	\$40,358	\$40,348	Yes
Office Contractual Support  <i>Note: Contractors to assist the Office with legal, communications, community outreach, grant management, software licensing and support.</i>	\$6,373,487	\$1,633,607	\$1,483,508	\$983,508	\$983,508	\$833,508	\$455,848	Yes
Indirect Cost	\$3,159,684	\$428,234	\$448,962	\$471,248	\$494,716	\$845,686	\$470,838	No
<b>Total Administration: \$16,684,484</b>								
Grand Total	\$1,168,447,415	\$130,198,786	\$130,142,520	\$259,258,094	\$259,333,079	\$260,304,565	\$129,210,371	
State of Florida BEAD Allocation  <i>Note: The total allocation includes an initial planning award received by the Office of Broadband in the amount of</i>	\$1,169,947,392							

<i>\$4,999,977. To date, the Office has spent \$1,499,977 on BEAD planning efforts.</i>								
Funds Expended	(\$1,499,977)							
<b>BEAD Balance Available: \$1,168,447,415</b>								