



**STATE OF HAWAI‘I  
BEAD FINAL  
PROPOSAL**

**APPROVED BY NTIA  
NOVEMBER 18, 2025**

**VERSION 2.0**

## Document Version History

Version	Date	Summary of Changes
1.0	8/27/2025	Initial release for public comment
1.1	9/4/2025	Draft for NTIA Submission. Incorporates public comments received. Changes made in data submission and Requirements 1, 4, 5, 11, 12, 13, 14.
2.0	11/18/2025	NTIA approved draft. Incorporates the curing made on sections 3.1, 4.1, 5.1, and 12.1.

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## Introduction

A high-speed Internet connection used to be a nice-to-have, but today, it is a necessity. In 2020, the coronavirus pandemic highlighted Internet access disparities between urban and rural areas, between O‘ahu and the neighbor islands, and between socioeconomic groups, reinforcing that the Internet is for more than just entertainment; it is *essential* to have continuous access to education, work, healthcare, and other professional services. A high-speed Internet connection is especially critical for Hawai‘i to ensure our island state does not get left behind in the global economy as one of the most geographically isolated populations in the world.

Hawai‘i’s challenge involves ensuring all residents—from urban to rural areas, from Ni‘ihau to Hawai‘i Island, from keiki (children) to kūpuna (elderly)—have meaningful access to reliable and affordable high-speed Internet. To achieve this, Hawai‘i must lay the foundation by investing in quality broadband infrastructure in our first mile (transpacific), middle mile (inter-island), and last mile (to the home) connections.

Since March 2020, the federal government has dedicated over \$65 billion in federal funding to make sure that no one in the country is ever left behind because of a lack of Internet access again. In April 2023, Governor Josh Green, M.D., joined the White House and the U.S. Department of the Treasury to announce the release of \$115.5 million to improve broadband for the State of Hawai‘i. Hawai‘i is on track to receive roughly \$390 million from this historic investment.

The largest of all funding sources is the Broadband Equity, Access, and Deployment (BEAD) Program, administered by the National Telecommunications and Information Administration (NTIA), prioritizing the construction of high-speed Internet access to unconnected (i.e., unserved) locations, and to communities with underperforming Internet connections (i.e., underserved). Hawai‘i will see approximately \$149.5 million under the BEAD Program to connect an estimated 7,100 locations statewide that cannot connect to the Internet at home or are relying on outdated technology to get it..

Pursuant to Executive Memorandum No. 23-03, Governor Josh Green, M.D., designated the University of Hawai‘i (UH) as the coordinating entity to develop and implement statewide broadband objectives, goals, and projects. UH will be working closely with Lieutenant Governor Sylvia Luke, who oversees broadband initiatives for the Executive Branch of the State of Hawai‘i.

To date, the State of Hawai‘i has completed several major milestones of the BEAD Program, including the State’s BEAD Five-Year Action Plan, Initial Proposal, BEAD Challenge Process, and the Deployment Subgrantee Selection. The final milestone in the BEAD Program is to develop the State’s Final Proposal, an update to the NTIA-approved Initial Proposal as modified by the BEAD Restructuring Policy Notice, for BEAD grant funding, and, among other things, explains how Hawai‘i ensures every resident has access to a reliable, affordable, and high-speed broadband connection.

## About Connect Kākou

Connect Kākou is the Hawai'i statewide broadband initiative to ensure people from all walks of life have reliable and affordable access to high-speed Internet. The name "Connect Kākou" was chosen to reflect Hawai'i's goal of using high-speed internet to connect everyone across the state. The Hawaiian word "kākou" is used to convey the idea of "all of us," and underscores the sense of collective responsibility and unity that this initiative represents.

Led by Governor Josh Green, M.D., and Lieutenant Governor Sylvia Luke with partners from the Hawai'i Broadband Office, the University of Hawai'i, the Department of Hawaiian Home Lands, and multiple state and county agencies, Connect Kākou encompasses BEAD and other broadband efforts across the State.

The website for Connect Kākou can be found at <https://www.connectkakou.org/>. The website serves as the centralized hub for residents and community partners to access resources and learn about Hawai'i's current and future broadband efforts.

## Final Proposal Data Submission

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

See ‘fp\_subgrantees’ csv file.

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

See ‘fp\_deployment\_projects’ csv file.

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

See ‘fp\_locations’ csv file.

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

See ‘fp\_no\_BEAD\_locations’ csv file.

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

Yes.

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

See ‘fp\_cai’ csv file.

## Subgrantee Selection Process Outcomes (Requirement 1)

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

The University of Hawai'i Broadband Office (UHBO) utilized the Research Corporation of the University of Hawai'i's (RCUH) Request for Proposal (RFP) process as described in the Hawai'i Initial Proposal Volume 2 (IPV2) to conduct a fair, open, and competitive deployment subgrantee selection process. The RFP process involved potential subgrantees (also known as Offerors) responding to the RFP with proposals to serve all unserved, underserved, and community anchor institution (CAI) locations. Offerors were awarded based on meeting the minimum qualifications and a proposal obtaining the highest scoring average among the five-member review committee.

The State of Hawai'i defined four project areas covering the entire state for subgrantee selection: County of Kaua'i, City and County of Honolulu, County of Maui (inclusive of Kalawao), and County of Hawai'i. Offerors were not able to define their own project areas.

In November 2024, a total of eight RFPs were released: four RFPs for unserved and underserved locations, and four RFPs for CAI locations. All RFPs were independent of each other. Offerors were required to validate locations and serve all unserved, underserved, and CAI locations in each project area.

UHBO paused these RFP proceedings in April 2025 in anticipation of receiving new guidance from NTIA that would entail changes to the BEAD project scope and scoring criteria. Following the June 6, 2025 publication of the BEAD Restructuring Policy Notice (RPN), UHBO released eight new RFPs in July 2025, as part of the final "Benefit of the Bargain" Round mandated by the new federal guidance. These RFPs maintained the original four project areas covering the entire state for subgrantee selection: County of Kaua'i, City and County of Honolulu, County of Maui (inclusive of Kalawao), and County of Hawai'i. Offerors were required to validate locations and serve all unserved, underserved, and CAI locations in each project area. Offerors were also allowed to exclude select unserved and underserved locations from the project areas that were determined by the Offeror as excessively high-cost locations or would otherwise make the project economically non-viable.

It should be noted that prior to the July 2025 release of the revised RFPs, UHBO updated its NTIA-approved post-Challenge Process lists of unserved, underserved, and CAI locations in accordance with the RPN. This included removing locations not in the December 31, 2024 fabric version of the FCC National Broadband Map and locations already served by enforceable commitments. Hawai'i did not have any locations within an enforceable commitment default and therefore did not add any locations back to its list of unserved and underserved locations. Additionally, UHBO complied with the RPN's requirement to identify and notify any unlicensed fixed wireless providers that served

any BEAD-eligible locations. CAI locations were reevaluated in accordance with the statutory definition.

As directed in the RPN, UHBO removed non-statutory requirements as part of the scoring criteria and subgrantee requirements in the RFP. The RFP scoring criteria were also revised according to the RPN. Offerors were still required to provide a low-cost broadband service option, but Offerors were allowed to propose their own rate. Hawai'i did not have a prequalification phase for subgrantee selection and allowed all provider types to participate in the RFP process.

Following the RFP closing date for receipt of proposals, all Offeror responses were collected and scored based on whether the proposal was considered a "Priority Broadband Project" or a "Non-Priority Broadband Project" using the definition<sup>1</sup> in the RPN. Proposals considered a "Priority Broadband Project" were scored and awarded prior to those considered a "Non-Priority Broadband Project."

### Hawai'i BEAD RFP Timeline

Event	Date and Time
Date of Notice (RFP Issued)	July 11, 2025
Closing Date for Receipt of Offeror's Attachment A (Notice of Intent to Submit a Proposal)	July 18, 2025
Closing Date for Receipt of Offeror Questions	July 21, 2025 (5pm HST)
Closing Date for Posting Responses to Questions	July 24, 2025
Closing Date for Receipt of Proposals	August 1, 2025 (5pm HST)
Proposal Review Period	August 2 - 4, 2025
Date of Contractor Selection and Preliminary Award	August 5, 2025
Award and Services Start Date (Tentative)	Subject to NTIA Approval of Final Proposal

<sup>1</sup> <https://www.ntia.gov/other-publication/2025/bead-restructuring-policy-notice> Page 9

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

As part of the RFP process, UHBO took the following steps as described in the IPV2 to ensure a fair, open, and competitive process.

Fairness

To ensure fairness, prior to scoring, the review committee was required to disclose any current financial, equity, role-based, or intellectual property conflict of interests (COI). If a COI is disclosed that would create any real or perceived COI by a committee member, the person would not serve on the review committee to safeguard against COI. In addition, all committee members were required to review the RFP documents and scoring rubric for understanding prior to serving on the committee.

During the RFP process, Offerors were required to acknowledge in writing that there was no collusion amongst providers, consistent with the Federal Communications Commission's prohibited communications rules for auction. Failure to adhere would have resulted in a non-award to the potential subgrantee. Additionally, Offerors were required to disclose company ownership information and was reviewed prior to awarding to safeguard against collusion and conflict of interest.

Openness

To ensure openness, the RFP documents were accessible to the public via the UHBO broadband website and announced through multiple communications channels including email newsletters and the Lieutenant Governor's office. All RFPs were officially released via CommercePoint <https://www.commercepoint.com/>, a publicly accessible website. The RFP process did not exclude any type of provider from submitting a proposal.

In addition, as part of the RFP process, any questions submitted prior to the Closing Date for Receipt of Offeror Questions were made available to all Offerors on July 23, 2025, via an addendum on the RFP on the CommercePoint site. This ensured no Offeror was privy to information over another Offeror while adhering to RCUH procurement best practices.

Competitiveness

The RCUH RFP process is designed to be a competitive process to obtain the best value while ensuring compliance with all applicable federal and state laws. Numerous extramural federal funding has been successfully competitively awarded through this process for Hawai'i.

The review committee consisted of five (5) members including the director of the state BEAD program, two (2) technical reviewers with experience in the telecommunications industry, and two (2) broadband specialists. Following the RPN, the scoring rubric was designed to be as objective as possible and technology neutral, allowing for competitive

awards based on merit and formulaic awarding of points based on proposal responses. All scoring criteria used were publicly available. The selection committee was required to use the same scoring rubric for each proposal ensuring uniformity in the scoring criteria used.

Project areas for the RFPs were strategically chosen to maximize competitiveness, coverage of unserved locations, and ease of comparison between proposals. Because project areas were by county and alternative project areas were not allowed to be set by an Offeror, each proposal could be compared like-to-like without the need to deconflict proposals, as each proposal would comprise the same set of unserved locations.

UHBO received multiple proposals for each project area and participation from providers of various technology types in the RFP process.

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

UHBO received multiple applications for each project area and thus did not need to follow the no-application process described in the Initial Proposal.

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

In accordance with the BEAD Restructuring Policy Notice, UHBO utilized the statutory CAI definition to revise its CAI list, conforming it to Section 4 of the Notice. CAIs that were not aligned with the statutory definition were not considered BEAD-eligible and therefore not served by a BEAD deployment project.

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

Yes.

## Timeline for Implementation (Requirement 3)

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

Both fiber and low earth orbit satellite (LEO) subgrantees will be required to provide service to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant.

The Request for Proposals (RFP) included a scope of work for the project as part of the subgrant agreement. Details of the scope of work included that the subgrantee begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant. The RFP also included scoring criteria incentivizing subgrantees to complete the deployment in less than four years.

According to the Hawai'i Initial Proposal Volume 2 (IPV2), Section 2.16, subgrantees will be required to provide reports detailing deployment progress and expenditures for reimbursement and project oversight. UHBO will also conduct site visits and desk reviews of subgrantee progress to ensure the project is within the subgrantee's proposed timeline.

Fiber providers will be held to a period of performance that concludes four (4) years from the date upon which the subgrantee certifies to the State of Hawai'i that broadband is available to every location covered by the project area.

LEO subgrantees will be held to a period of performance that concludes ten (10) years from the date upon which the subgrantee certifies to the State of Hawai'i that broadband is available to every location covered by the project area.

UHBO will ensure that all subgrant activities by subgrantees are completed at least 120 days prior to the end of the period of performance and ensure that all programmatic BEAD grant activities undertaken by the State of Hawai'i are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

UHBO currently and will continue to publicize the Hawai'i State Ethics Commission's public waste, fraud, and abuse hotline (808-587-0000) and contact information (<https://ethics.hawaii.gov/anti-fraud/>) via the UH broadband website and Connect Kākou

websites. UHBO will make the link and contact information for the fraud hotline a permanent feature at the bottom of all future newsletters, which will continue to be sent out on a regular basis as the subgrantee proceeds with deployment.

## Oversight and Accountability (Requirement 4)

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

Yes.

<https://ethics.hawaii.gov/anti-fraud/>

808-587-0000

UHBO currently and will continue to publicize the Hawai'i State Ethics Commission's public waste, fraud, and abuse hotline and contact information via the UH broadband website and Connect Kākou websites. UHBO will make the link and contact information for the fraud hotline a permanent feature at the bottom of all future newsletters, which will continue to be sent out on a regular basis as the subgrantee proceeds with deployment.

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

(1) BEAD program monitoring plan;

(2) Agency policy documentation which includes the following practices:

a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and

b. Timely subgrantee (to Eligible Entity) reporting mandates.

1) See 'Appendix B' in the State of Hawai'i BEAD Final Proposal Appendix.

2) See 'Appendix C' in the State of Hawai'i BEAD Final Proposal Appendix.

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

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;

- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

Yes. Hawai'i certifies that the subgrant agreements will include, at a minimum, the above conditions.

## Local Coordination (Requirement 5)

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

The Final Proposal was posted for Public Comment on the UH Broadband website<sup>2</sup> on August 27, 2025. Acceptable methods to submit public comments included telephone and email. The Public Comment period was open for seven (7) days and concluded on September 3, 2025.

Hawai'i received a handful of public comments from individual residents and groups including non-profits, businesses and labor unions. Commenters primarily discussed BEAD deployment program changes enacted in response to the BEAD RPN. In particular, commenters expressed concern about the reliability of some LEO satellite providers and suggested Hawai'i's remaining deployment funds could be best leveraged by focusing on upgrading service at affordable multi-dwelling units and other highly populated communities. Commenters also expressed disappointment at the apparent lack of non-deployment funds to support wraparound services to help un- and underserved communities fully utilize their broadband connections to take full advantage of opportunities in the digital economy. The majority of commenters supported Hawai'i's efforts to utilize its full BEAD allocation to achieve maximum leverage and impact for all residents and ensure lasting value for Hawai'i's broadband future and digital economy. The final commenter expressed concerns over the use of BEAD funds to address critical middle mile interconnections.

After reviewing all of the comments provided, no substantive changes were made to the Final Proposal, however, it was determined that in future communications detailing middle mile budget expenditures, UHBO will emphasize the necessity of middle mile interconnections in order to add clarity. Any comments shared after the published deadline will continue to be received during the anticipated Final Proposal curing period.

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<sup>2</sup> <https://www.hawaii.edu/broadband/final-proposal/>

## Challenge Process Results (Requirement 6)

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

### Yes

The University of Hawai'i Broadband Office (UHBO) administered the State of Hawai'i's BEAD Challenge Process based on the NTIA BEAD Model Challenge Process. Hawai'i used the December 31, 2023 version of the FCC National Broadband Map published on May 14, 2024 as the starting data for the Challenge Process. Prior to the start of the Challenge Process, UHBO published the initial set of locations eligible for BEAD funding on its website (<https://www.hawaii.edu/broadband/challenge-process/>) in June 2024 and invited nonprofit organizations, units of local governments, and broadband service providers to participate in Hawai'i's Challenge Process. UHBO held multiple training sessions virtually and in-person and provided resources to all eligible participants at least a week prior to the opening of the challenge submission window on its website and the Connect Kākou website.

The State of Hawai'i's Challenge Process was held in a transparent, fair, expeditious, and evidence-based manner from August 2024 to December 2024 as followed:

- **Challenge Phase:** August 19, 2024 – September 18, 2024 (30 days)
- **Rebuttal Phase:** October 7, 2024 – November 6, 2024 (30 days)
- **Final Determination Phase:** November 7, 2024 – December 7, 2024 (30 days)

Throughout the Challenge Process, UHBO utilized its existing weekly meetings with local government entities to address any comments, questions, or concerns that arose for the duration of the challenge phase. Weekly virtual office hours held by UHBO were available to participating nonprofit organizations and Internet service providers for the duration of the Challenge Phase to address any comments, questions, or concerns.

UHBO followed an internal Standard Operating Procedure document to make all initial challenge reviews and final determinations. Prior to the beginning of the Final Determination Phase, all reviewers submitted affidavits to ensure there is no conflict of interest in making challenge determinations.

Following the Final Determination Phase, UHBO identified any enforceable commitments funded by the federal or state government and deduplicated locations for BEAD funding.

The State of Hawai'i received NTIA approval of its BEAD Challenge Process results on December 20, 2024.

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

The State of Hawai'i Challenge Process results and final NTIA-approved classification of BEAD-eligible unserved, underserved, and CAI locations can be found at <https://www.hawaii.edu/broadband/challenge-process/>. The final location classifications were publicly posted on December 20, 2024, and for at least 60 days before allocating grant funds for network deployment.

## Unserved and Underserved Locations (Requirement 7)

### Coverage of Unserved Locations

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

Yes.

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

Not Applicable.

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

Not Applicable.

### Coverage of Underserved Locations

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

Yes.

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

Not Applicable.

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

Not Applicable.

**7.7 Question (Y/N):** Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list

through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the *fp\_no\_BEAD\_locations.csv* file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

Yes.

**7.8 Question (Y/N):** Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

Yes.

## Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience (Requirement 11)

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

### **a. Promoting the use of existing infrastructure**

Status: In Progress

The University of Hawai'i Broadband Office (UHBO) is working closely with other state and county partners to ensure existing infrastructure is utilized and funding is optimized. For example, UHBO has been working closely with the Department of Hawaiian Home Lands (DHHL) to identify existing infrastructure on Hawaiian Home Lands and planned infrastructure to be built using BEAD funding that DHHL can utilize and vice versa. This allows federal funding allocated to DHHL to be maximized and prevents duplication of infrastructure deployment.

### **b. Promoting and adopting dig-once policies**

Status: In Progress

The State of Hawai'i does not have a dig-once policy. However, the State does have a dig law<sup>3</sup> in place requiring an entity to notify other entities via the Hawai'i One Call Center at least five working days, but not more than 28 calendar days, before the planned subsurface activities. This dig law reduces the risk of unintended costs and delays from improper excavation as a result of possible underground broadband deployment. Subgrantees new to the Hawai'i market will be made aware of applicable dig laws.

UHBO currently anticipates the subgrantees will begin seeking local permits to begin work in Spring 2026 and physical installation or construction to follow after approvals are obtained.

### **c. Streamlining permitting processes**

Status: In Progress

UHBO has identified and is working closely with the various state and county partners who we anticipate will have jurisdiction and potential regulatory interactions regarding permits with the subgrantee. These entities have been made aware of the upcoming BEAD deployment award and UHBO has kept them updated with expected project timelines. In particular, our county broadband partners are keenly interested in streamlining permitting processes in order to facilitate faster delivery of the broadband infrastructure.

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<sup>3</sup> <https://www.digsafelyhawaii.com/dig-law/>

UHBO currently anticipates the subgrantees will begin seeking local permits to begin work in Spring 2026 and physical installation or construction to follow after approvals are obtained.

**d. Streamlining cost-effective access to poles, conduits, easements**

Status: In Progress

UHBO is working closely with state and county partners, and private entities, who may have ownership and or regulatory jurisdiction with the subgrantee regarding access to facilitate streamlined and cost-effective access to poles, conduits and easements. UHBO expects the subgrantee to take the lead in these situations but plans to remain engaged to help ensure on-time project delivery. UHBO currently anticipates the subgrantees will begin seeking local permits to begin work in Spring 2026 and physical installation or construction to follow after approvals are obtained.

**e. Streamlining rights of way, including the imposition of reasonable access requirements.**

Status: In Progress

UHBO is working closely with state and county partners, and private entities, who may have jurisdiction and potential interactions with the subgrantee regarding access to facilitate streamlined cost-effective access to poles, conduits and easements. UHBO expects the subgrantee to take the lead in these situations but plans to remain engaged to help ensure on-time project delivery.

UHBO currently anticipates the subgrantees will begin seeking local permits to begin work in Spring 2026 and physical installation or construction to follow after approvals are obtained.

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

Yes.

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

Not Applicable.

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

Yes.

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

Not Applicable.

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

Yes.

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

Not Applicable.

## Substantiation of Priority Broadband Projects (Requirement 12)

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

During the Request for Proposal (RFP) process, the University of Hawai'i Broadband Office (UHBO) made it clear to all potential subgrantees (also known as Offerors) that proposals would be scored and awarded based on whether they are considered a "Priority Broadband Project" or a "Non-Priority Broadband Project". Proposals considered "Priority Broadband Projects" were scored and awarded for each project area prior to scoring and awarding proposals considered "Non-Priority Broadband Projects".

UHBO strictly adopted the BEAD Restructuring Policy Notice's (RPN) definition of a "Priority Broadband Project" or a "Non-Priority Broadband Project" when evaluating proposals submitted for unserved and underserved locations. To be considered a "Priority Broadband Project", UHBO used the following criteria: *"a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services."*

For each proposal submitted, UHBO evaluated whether the proposed technology, service architecture, and network design would meet the specific requirements of the RPN for current *and* future scalability needs to qualify as a Priority Broadband Project. This approach was inclusive of all proposals, for all project areas. Of note, the substantive material submitted by each Offeror was identical across project areas. As a result, the only potential difference in service effectiveness might have been related to the density of locations served within each project area. The potential for density impacting minimum performance was noted in one of the LEO proposals, for the Hawai'i Island project area, and suitably addressed with planned increases in overall capacity by 2027.

The LEO satellite deployment proposals were similar in approach and architecture, and notably did not address the differential latency for service locations in Hawai'i, compared to the continental US (CONUS) NAP connections assumed to be reasonable for CONUS locations. While the theoretical minimum latency was below the 100 milliseconds (ms) floor, UHBO noted material architectural flaws in the lack of peering with the primary Hawai'i Internet Exchange (HIX) locations, along with additional latency factors resulting from service to earth station locations located at a distance from Hawai'i trans-Pacific cable landing stations. Of material note, the use of CONUS NAP connections for access to the Internet would cause additional latency (+50-60ms) in reaching any Hawai'i based information services, to include Hawai'i governmental services, University of Hawai'i on-premise services, Hawai'i-based healthcare service

delivery providers, and any of the large number of commercial, financial and other providers with hosting locations in Hawai'i. The architecture places all of these Hawai'i offerings at a significant latency disadvantage for Hawai'i resident access.

The primary factor considered in qualifying LEO satellite deployment proposals as non-Priority Broadband Projects was the service, spectrum, and architectural capacity limitations that do not allow either of the LEO Offerors to easily scale to provide for the future capacity needs as required under the RPN technical requirements. While the services have described the capacity to meet the minimum 100/20/100 performance floor during the period of performance, the systems do not appear to have the capacity to provide enhanced services to residential consumers based on the primary spectrum used (Ka/Ku band), as well as the potential additional spectrum (Q/V band) that *may* be allocated in future proceedings with the FCC. In addition, any services in the higher frequency bands will experience significant and material interference with heavy cloud/smoke/fog, precipitation, and other terrestrial interference (e.g., foliage, buildings, terrain obstructions).

UHBO has prior experience in using millimeter wave technology for short-haul connections, and has first-hand knowledge of these impacts even at speeds of under 1Gb and distances of 1-4 miles. While UHBO acknowledges there could be improvements in transponders and customer antennas, the limitations of the spectrum are unavoidable and provide serious doubt as to the ability of the LEO satellite services to easily scale as required. We are aware of 1+ Gb symmetrical capabilities available using the technology; however, that level of performance requires earth station style implementations, and takes away material capacity from the available satellite transponders (i.e., taking from the service capacity for consumers).

UHBO does find that the LEO satellite proposals are suitable as non-Priority Broadband Projects, that are particularly suited for extremely high cost service area alternatives to traditional wireline provisioned services. In addition, use of these services for portable and emergency deployments is highly appropriate as they are mostly independent of terrestrial infrastructure (assuming availability of suitable power sources).

## Subgrantee Selection Certification (Requirement 13)

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

### Priority Broadband Project Scoring Criteria

#### Unserved and Underserved

The scoring criteria used in the unserved and underserved Request for Proposals (RFP) for Priority Broadband Projects set the Minimal BEAD Program Outlay as the primary criterion, comprising 81.63% of the total score. Secondary criteria set the Speed to Deployment and Speed of Network and Other Technical Capabilities, comprising 18.37% of the total score.

**Total Points: 245**

Unserved & Underserved Priority Broadband Project Scoring Criteria	Points
<b>Primary Criteria (200 Points)</b>	
Minimal BEAD Program Outlay	200
<b>Secondary Criteria (45 Points)</b>	
Speed to Deployment	30
Speed of Network and Other Technical Capabilities	15

The Minimal BEAD Program Outlay score consisted of two parts: one representing the requested BEAD funding amount (Total project cost minus matching) and the other representing the cost to the BEAD Program per location. Point values from Part 1 and Part 2 will be added to obtain the Minimal BEAD Program Outlay score.

**Part 1: Requested BEAD funding amount: Maximum Points: 100**

The prospective subgrantee that requests the LOWEST amount of requested BEAD funding will receive the maximum score. The points allocated to bidders with larger amounts will be equal to the lowest amount, multiplied by the maximum points for Part 1, and then divided by the larger amount. Example: Maximum Points for Part 1: 100 points

Offeror A Requested: \$20m (lowest amount) = Awarded 100 points

Offeror B Requested: \$25m (higher) =  $100 \times (20/25) =$  Awarded 80 points

Offeror C Requested: \$35m (higher) =  $100 \times (20/35) =$  Awarded 57.1 points

### Part 2: Cost per location: Maximum Points: 100

The prospective subgrantee that offers the LOWEST amount of BEAD funding per broadband serviceable location (BSL) in the project area will receive the maximum score. The points allocated to bidders with lower amounts of cost per location will be equal to the lower amount, multiplied by the maximum points for Part 2, and then divided by the largest amount.

Example: Maximum Points for Part 2: 100 points

Offeror A cost per BSL: \$2k (higher amount) =  $100 \times (1/2) =$  Awarded 50 points

Offeror B cost per BSL: \$1k (lowest amount) = Awarded 100 points

Offeror C cost per BSL: \$1.5k (higher amount) =  $100 \times (1/1.5) =$  Awarded 66.7 points

Summation of Part 1 and Part 2 will be done to obtain the total Minimal BEAD Program Outlay score. In the examples above:

Offeror A:  $100 + 50 = 150$  Points

Offeror B:  $80 + 100 = 180$  Points

Offeror C:  $57.1 + 66.7 = 123.8$  Points

If proposals had project costs within 15 percent of the lowest cost proposal, the secondary criteria were used for all proposals.

The Speed to Deployment score was based on the committed total duration required to deploy connectivity and begin providing services to defined areas. Points were given based on the proposal's months to complete the project using the following formula: forty-eight (48) minus the Offeror's proposed number of months to complete the deployment, then divided by forty-eight (48), then multiplied by the maximum number of points.

Example: Maximum Points for Speed to Deployment: 30 points

- Offeror A: 36 months to complete project =  $((48-36)/48) * 30 =$  Awarded 7.5 points
- Offeror B: 30 months to complete project =  $((48-30)/48) * 30 =$  Awarded 11.25 points
- Offeror C: 24 months to complete project =  $((48-24)/48) * 30 =$  Awarded 15 points

The Speed of Network and Other Technical Capabilities score was based on the maximum speed, latency, and other technical capabilities offered as well as points based on the longevity (useful life) of the asset, and cost-effectiveness of future scalability. Point totals from the following three categories were added up to obtain the total for the Speed of the Network section.

Max speed and latency for unserved and underserved locations: Maximum score - 5 points

100 Mbps download / 20 Mbps upload & less than 100ms	1 points
100 Mbps download / 50+ Mbps upload & less than 100ms	2 points
250 Mbps download / 50+ Mbps upload & less than 100ms	3 points
500 Mbps download / 100+ Mbps upload & less than 100ms	4 points
1000 Mbps download / 500+ Mbps upload & less than 100ms	5 points

Longevity: Maximum score - 5 points

The prospective subgrantee will describe the useful life of the installed assets and provide references to real-life examples of such lifespan. Life spans of 15 years or greater will receive the maximum number of points; life spans shorter than 15 years will receive a prorated amount. UHBO will review the proposed lifespan to verify the accuracy of such statements.

Cost-effectiveness of Future Scalability: Maximum score - 5 points

The prospective subgrantee will describe the future scalability of the installed assets to meet the evolving connectivity needs of households and businesses; and support the deployment of 5G, successor wireless technologies, and other advanced services; and describe the cost-effectiveness of future upgrades (such as maximum speed increases) based on the installed assets. UHBO will review the described future scalability and score based on the effectiveness of the proposal. Proposals that are very effective will receive the maximum score of 5 points. Proposals that are less effective will receive fewer points.

CAI

A similar approach was taken for the CAI RFP process, with the exception of removing the “max speed and latency” points for the Speed of Network and Other Technical Capabilities criteria, as the speed requirements were a minimum of 1 Gbps symmetrical.

The scoring criteria used in the CAI Request for Proposals (RFP) for Priority Broadband Projects set the Minimal BEAD Program Outlay as the primary criterion, comprising 83.3% of the total score. Secondary criteria set the Speed to Deployment and Speed of Network and Other Technical Capabilities, comprising 16.7% of the total score.

**Total Points: 240**

<b>CAI Priority Broadband Project Scoring Criteria</b>	<b>Points</b>
<b>Primary Criteria (200 Points)</b>	
Minimal BEAD Program Outlay	200
<b>Secondary Criteria (40 Points)</b>	
Speed to Deployment	30
Speed of Network and Other Technical Capabilities	10

The Minimal BEAD Program Outlay score consisted of two parts: one representing the requested BEAD funding amount (Total project cost minus matching) and the other representing the cost to the BEAD Program per location. Point values from Part 1 and Part 2 will be added to obtain the Minimal BEAD Program Outlay score.

Part 1: Requested BEAD funding amount: Maximum Points: 100

The prospective subgrantee that requests the LOWEST amount of requested BEAD funding will receive the maximum score. The points allocated to bidders with larger amounts will be equal to the lowest amount, multiplied by the maximum points for Part 1, and then divided by the larger amount. Example: Maximum Points for Part 1: 100 points

Offeror A Requested: \$20m (lowest amount) = Awarded 100 points

Offeror B Requested: \$25m (higher) =  $100 \times (20/25)$  = Awarded 80 points

Offeror C Requested: \$35m (higher) =  $100 \times (20/35)$  = Awarded 57.1 points

Part 2: Cost per location: Maximum Points: 100

The prospective subgrantee that offers the LOWEST amount of BEAD funding per broadband serviceable location (BSL) in the project area will receive the maximum score. The points allocated to bidders with lower amounts of cost per location will be equal to the lower amount, multiplied by the maximum points for Part 2, and then divided by the largest amount.

Example: Maximum Points for Part 2: 100 points

Offeror A cost per BSL: \$2k (higher amount) =  $100 \times (1/2)$  = Awarded 50 points

Offeror B cost per BSL: \$1k (lowest amount) = Awarded 100 points

Offeror C cost per BSL: \$1.5k (higher amount) =  $100 \times (1/1.5)$  = Awarded 66.7 points

Summation of Part 1 and Part 2 will be done to obtain the total Minimal BEAD Program Outlay score. In the examples above:

Offeror A:  $100 + 50 = 150$  Points

Offeror B:  $80 + 100 = 180$  Points

Offeror C:  $57.1 + 66.7 = 123.8$  Points

If proposals had project costs within 15 percent of the lowest cost proposal, the secondary criteria were used for all proposals.

The Speed to Deployment score was based on the committed total duration required to deploy connectivity and begin providing services to defined areas. Points were given based on the proposal's months to complete the project using the following formula: forty-eight (48) minus the Offeror's proposed number of months to complete the deployment, then divided by forty-eight (48), then multiplied by the maximum number of points.

Example: Maximum Points for Speed to Deployment: 30 points

- Offeror A: 36 months to complete project =  $((48-36)/48) * 30 =$  Awarded 7.5 points
- Offeror B: 30 months to complete project =  $((48-30)/48) * 30 =$  Awarded 11.25 points
- Offeror C: 24 months to complete project =  $((48-24)/48) * 30 =$  Awarded 15 points

The Speed of Network and Other Technical Capabilities score was based on the longevity (useful life) of the asset, and cost-effectiveness of future scalability. Point totals from the following two categories were added up to obtain the total for the Speed of the Network section.

Longevity: Maximum score - 5 points

The prospective subgrantee will describe the useful life of the installed assets and provide references to real-life examples of such lifespan. Life spans of 15 years or greater will receive the maximum number of points; life spans shorter than 15 years will receive a prorated amount. UHBO will review the proposed lifespan to verify the accuracy of such statements.

Cost-effectiveness of Future Scalability: Maximum score - 5 points

The prospective subgrantee will describe the future scalability of the installed assets to meet the evolving connectivity needs of households and businesses; and support the deployment of 5G, successor wireless technologies, and other advanced services; and describe the cost-effectiveness of future upgrades (such as maximum speed increases) based on the installed assets. UHBO will review the described future scalability and score based on the effectiveness of the proposal. Proposals that are very effective will receive the maximum score of 5 points. Proposals that are less effective will receive fewer points.

## Application of Scoring Criteria

UHBO received four proposals for each project area for all unserved and underserved RFPs. UHBO received two proposals for each project area for all CAI RFPs.

Proposals received during the RFP were categorized as either a priority or a non-priority broadband project based on the definition<sup>4</sup> in the BEAD Restructuring Policy Notice. Using the process described in the BEAD Restructuring Policy Notice, if a proposal's costs were within 15% of the lowest proposal's costs, the secondary scoring criteria would have been used in the scoring.

For unserved and underserved RFPs, one proposal was disqualified for not meeting the minimum qualifications. Of the remaining three qualifying proposals, one was determined to be a priority broadband project, and the other two were determined to be non-priority broadband projects.

Since there were no other priority broadband project proposals, the one priority broadband project proposal was awarded. For the non-priority projects, there were no proposals that were within the 15% cost threshold, so the Minimal BEAD Program Outlay was the only applicable criteria used in the scoring and selection of the non-priority unserved and underserved proposals.

For CAI RFPs, one proposal was disqualified for not meeting the minimum qualifications. The remaining proposal was determined to be a priority broadband project and was the only qualifying CAI proposal.

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<sup>4</sup> <https://www.ntia.gov/other-publication/2025/bead-restructuring-policy-notice> "Priority Broadband Project" definition Page 9

## Environmental and Historic Preservation Documentation (Requirement 14)

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

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's programmatic and National Environmental Policy Act (NEPA) guidance.

The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

See 'Appendix D' in the State of Hawai'i BEAD Final Proposal Appendix.

## Consent from Tribal Entities (Requirement 15)

### **15.1 Attachment(s) (Required if any deployment project is on Tribal Lands):**

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

While not applicable, the UHBO is in regular communications with the Department of Hawaiian Home Lands (DHHL), and its Tribal Broadband Connectivity Program (TBCP) project team to ensure that any efforts are consistent with the requirements to access and service DHHL locations. To help achieve 100% coverage for Hawai'i, UHBO coordinated its RFP efforts with DHHL to procure a provider to serve unserved and underserved locations on DHHL lands and will allocate those costs to TBCP2 funds during the final project negotiation and contract phases. In order to maintain efficiencies of scale, UHBO will jointly monitor and oversee any deployment efforts on DHHL lands with the DHHL TBCP project team.

As stated in the UHBO RFPs, any approved subgrantee will have to obtain written authorization from DHHL for its service delivery teams to enter and operate on DHHL lands.

## Prohibition on Excluding Provider Types (Requirement 16)

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

Yes. Hawai'i certifies that it did NOT exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant.

## Waivers

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

Not Applicable.

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