



**State of Maine**

**BEAD FINAL PROPOSAL**

**// DRAFT FOR PUBLIC COMMENT //**

Broadband Equity Access and Deployment Program



**MAINE  
CONNECTIVITY  
AUTHORITY**



# BEAD Final Proposal

// DRAFT for Public Comment //



## Introduction from MCA President, Andrew Butcher

On behalf of the Maine Connectivity Authority (MCA), we are pleased to share Maine's Draft Broadband Equity, Access, and Deployment (BEAD) Final Proposal outlining the strategy to deploy broadband infrastructure to achieve universal internet access in Maine, one of the most rural states in the Country. **The BEAD program is a vital part of Maine's connectivity strategy and commitment to ensure everyone in Maine has access to affordable, reliable, high-speed internet for a future of increased connectivity.**

Since 2023, the BEAD program has served as a critical resource to ensure Maine's most rural, remote and hard-to-reach locations will have an option to get connected. An extensive planning and engagement process manifesting Maine's Broadband Action Plan has helped leverage over \$250M of additional state, federal and private funds to address a significant portion of Maine's unserved broadband serviceable locations. It is through this process that a "comprehensive connectivity" strategy was developed to ensure efficient infrastructure deployment through a diversity of technologies.

This proposal for BEAD Infrastructure Deployment reflects full compliance with the June 2025 Restructuring Policy Notice to ensure maximum benefit of the program to connect all remaining unserved locations. Eligible Project Service Areas (PSAs) have been designed with pragmatism and efficiency to support a variety of Internet Service Providers (ISPs), balancing the deployment of the right technology in the right place.

The results of the "Benefit of the Bargain" round have helped realize nearly \$100M in savings in deployment costs and an impressive level of private match and a mix of technologies (85.7% Fiber, 14% LEO, 0.3% HFC) from a variety of service providers.

MCA, Maine communities, ISPs and a robust support network are ready to get to work and maximize the benefit of this historic investment in connectivity. To ensure the financial sustainability of the infrastructure deployment, the BEAD program includes critical enabling investments in internet infrastructure, including wireless and cellular backhaul; service to approved community anchor institutions and multi-dwelling units; job training, and skills to expand economic growth in previously underserved parts of the state. We look forward to working with NTIA to integrate those investments in complement to the Deployment strategy outlined here.

Infrastructure Deployment combined with the Enabling Investments ensures no one is left in the digital dark - and that people, businesses, institutions, and communities can thrive in a connected world. Our increasing demand for connectivity means that both internet access and the ability to use it are equally important and will require continuous stewardship.

Thank you to all the people (past, present, and future) who have contributed to this effort.

We ARE getting there from here!

A handwritten signature in blue ink, appearing to read "Andrew Butcher".

Andrew Butcher, President  
Maine Connectivity Authority

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## Final Proposal Data Submission

### 0.1 Subgrantees CSV Attachment

*Complete and submit the Subgrantees CSV file (named "fp\_subgrantees.csv") using the NTIA template provided.*

To view this attachment, please go to [Maine BEAD Final Proposal Attachments](#) at <https://drive.google.com/drive/folders/1N07o9hBpdtSYI7miJDQYIEZZWoaGNkEG> and click on:

- [fp\\_subgrantees.csv](#)

### 0.2 Deployment Projects CSV Attachment

*Complete and submit the Deployment Projects CSV file (named "fp\_deployment\_projects.csv") using the NTIA template provided.*

To view this attachment, please go to [Maine BEAD Final Proposal Attachments](#) at <https://drive.google.com/drive/folders/1N07o9hBpdtSYI7miJDQYIEZZWoaGNkEG> and click on:

- [fp\\_deployment\\_projects.csv](#)

### 0.3 Locations CSV Attachment

*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.*

To view this attachment, please go to [Maine BEAD Final Proposal Attachments](#) at <https://drive.google.com/drive/folders/1N07o9hBpdtSYI7miJDQYIEZZWoaGNkEG> and click on:

- [fp\\_locations.csv](#)

### 0.4 No BEAD Locations CSV

*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.*

To view this attachment, please go to [Maine BEAD Final Proposal Attachments](#) at <https://drive.google.com/drive/folders/1N07o9hBpdtSYI7miJDQYIEZZWoaGNkEG> and click on:

- [fp\\_no\\_BEAD\\_locations.csv](#)

### 0.5 BEAD Funds for CAIs

*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)?*



No, the Maine Connectivity Authority does not intend to use additional BEAD funds to serve CAIs. No applicants requested additional funds to serve CAIs, and a majority of applicants have committed to serving CAIs in project areas that will be served with BEAD Deployment funding.

### 0.6 CAI Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question 0.6)

*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.*

Not Applicable



## **Subgrantee Selection Process Outcomes (Requirement 1)**

### **1.1 Subgrantee Selection Process Narrative**

*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.*

#### **Initial Subgrantee Selection Process (September 2024 - March 2025)**

The Maine Connectivity Authority (MCA) implemented its Subgrantee Selection Process consistent with the framework described in Volume II of its NTIA-approved Initial Proposal (IPV2), ensuring that the process remained fair, transparent, and competitive, and adhered to the BEAD Notice of Funding Opportunity and other applicable NTIA requirements.

The process began with the three-phase State-Led Challenge Process (SLCP), which gave stakeholders, including individuals, nonprofit organizations, and internet service providers, the opportunity to contest MCA's initial determination of BEAD-eligible locations. The Challenge Phase ran from April 26 to May 31, 2024, during which permissible challengers submitted evidence. MCA also included the optional speed test module, accepting results collected from April 19 to May 31, 2024. The Rebuttal Phase ran from June 7 to July 2, 2024, allowing providers to respond to substantiated challenges. The Adjudication Phase followed from July 8 to August 2, 2024, during which MCA made final determinations on challenged locations. Of the 17,000 challenges submitted, 28 received rebuttal evidence and required adjudication, with six ultimately overturned. MCA published the adjudication results, including draft BEAD-eligible locations, on September 9, 2024.

Through the SLCP, MCA identified 14,703 unserved locations, 14,082 underserved locations, 603,145 served locations, and 3,882 Community Anchor Institutions. NTIA approved Maine's SLCP results on November 14, 2024, finalizing the list of eligible locations and Community Anchor Institutions. Once NTIA also approved the IPV2, MCA launched its two-phase Subgrantee Selection process.

The first phase, the Prospective Applicant Pre-Qualification Evaluation Application (Pre-Qualification), ran from September 18 to October 19, 2024. Applicants were assessed on their technical, financial, operational, and managerial capacity to implement broadband deployment projects successfully. Sixteen applicants met MCA's pre-qualification standards and advanced to the subsequent BEAD Project Application phase, demonstrating the rigor and objectivity of the evaluation process.

The second phase, the BEAD Project Application (BPA), opened on January 17, 2025, and was scheduled to close on February 28, 2025, but was later extended to March 7, 2025. Pre-qualified entities submitted project proposals for specific Project Service Areas (PSAs), committing to deploy broadband to approximately 28,000 locations and 2,400 Community Anchor Institutions (CAIs) statewide. Ahead of the BEAD Project

Application, MCA opted to remove locations according to Reason Codes 3, 4, 5, and proactively provided applicants with the ability to identify high-cost locations.

Initial results from the application process were highly encouraging, with applications for 385 project areas covering 79% of eligible locations. To complement broad participation, applicants pledged to match BEAD funds with 39% private investment, resulting in an average subsidy of less than \$5,000 per location. Of the project areas that received bids, 70% saw interest from more than one applicant, signaling a highly competitive process.

MCA thoroughly reviewed each application for eligibility, technical feasibility, financial sustainability, and consistency with Pre-Qualification submissions. Where proposals overlapped, MCA carried out a structured deconfliction process; as of March 2025, MCA had identified specific applications for preliminary award notification. However, MCA stopped its process just before negotiations upon notification that new guidance was forthcoming from NTIA that would materially change the program.

Throughout, MCA maintained transparency, including sharing draft PSAs for public feedback, hosting monthly BEAD calls, and maintaining a publicly accessible Resource Exchange. Minor procedural refinements, such as reopening the Pre-Qualification portal for 24 hours to allow an applicant to press "submit", were applied equitably to all participants and documented in line with NTIA guidance (RPN §IV, FAQ v14).

## **Benefit of the Bargain Round (*June - August 2025*)**

Following NTIA's issuance of the BEAD Restructuring Policy Notice on June 6, 2025 (RPN), MCA reopened the Subgrantee Selection Process to conduct a Benefit of the Bargain (BoB) round. As directed, MCA restructured its process to be technology-neutral and to focus its scoring criteria on minimizing the cost of deployment under the BEAD program. To determine priority project designation, MCA applied a consistent evaluation methodology (described in requirement 12 of this document) and transparent procedures.

On June 13, 2025, MCA publicly posted a BEAD Location Eligibility memorandum notifying unlicensed fixed wireless (ULFW) providers in the state of Maine that they had seven calendar days (until Friday, June 20) to indicate their intent to submit evidence that BEAD funding was not required for the locations they serve in line with the RPN. Ultimately, while one provider did signal interest in submitting data, they did not participate before the deadline.

In compliance with the Restructuring Policy Notice issued June 6, 2025, to ensure that the lists of BEAD eligible locations are accurate and to prevent overbuilding of privately funded networks and Federal, state, or locally funded locations by BEAD, MCA removed locations that had removed from the latest version of the FCC Fabric (reason code 3), locations already served by an enforceable commitment (reason code 4), and identified but did not omit locations already served by non-subsidized service (reason code 5) wherever possible. This was consistent with steps taken by MCA ahead of the initial Subgrantee Selection Process in

January. After reviewing locations flagged for removal as reason code 3, 4, and 5, MCA was left with a reduced list of BEAD Eligible locations down from 28,814 to 23,260.

MCA's BoB round officially began on July 10, 2025, when the Eligible Entity reopened both the Prospective Applicant Pre-Qualification Evaluation Application (Pre-Qualification) and the BEAD Project Application (BPA). Applicants pre-qualified in the previous round were not required to resubmit Pre-Qualification materials unless their qualifications had materially changed, while new applicants had six days to submit their Pre-Qualification application. Although no action was required for prior Pre-Qualification applications, applicants with previously submitted BPAs were required to update those to align with the RPN. This included following new instructions to account for costs associated with eliminating requirements, reflecting reduced location counts, and making use of the opportunity to identify and exclude excessive-cost locations.

All Pre-Qualification determinations (new or renewed) were issued within 48 hours of application submission to ensure new candidates had timely access to the BPA and associated mapping tool. The BPA submission deadline for all applicants was July 24, 2025. Throughout the process, applicants had equal access to detailed guidance, scoring rubrics, and submission tools, ensuring transparency and adherence to RPN §4 and FAQ v14 requirements.

Following the submission of all BPAs, technical, financial, and requirements-focused subject matter experts conducted a structured review of every application using clear and consistent rubrics to identify areas of deficiency. To preserve fairness, MCA allowed applicants to cure any deficiencies identified during this process. Once applications were deemed complete, MCA entered into a single round of structured negotiations to resolve overlapping bids, adjust PSAs and budgets, and review or approve revised materials submitted during the remediation process. MCA ensured that both the review and the negotiation/selection phases operated under neutrally applicable rules, consistent with the Restructuring Policy Notice's emphasis on impartiality and transparency.

In accordance with the NTIA directive, the BoB round prioritized cost-efficiency. The primary scoring factor was Minimal BEAD Outlay, calculated by considering total funding requested and overall award combinations to minimize program expenditures. Where two applicants submitted proposals within 15% of each other in project cost on a per BSL basis, MCA applied secondary scoring criteria described in section 13.1. These criteria evaluated (1) speed to deployment, awarding either 0 or 20 points for binding commitments to complete build-out within 24 months of permitting approval; (2) network quality, awarding 0 to 40 points based on speed, latency, and other technical capabilities as evidenced by the applicant's HLD and Technical Narrative; and (3) preliminary or provisional subgrantee status, awarding either 0 or 40 points to applicants MCA had identified as preliminary or provisional subgrantees in the March 2025 BPA round. In total, applicants could receive up to 100 points under this secondary scoring framework. Non-statutory scoring criteria used in Phase 1, such as labor practices, DEI policies, and certain community engagement measures, were removed in line with NTIA guidance.

During the BoB round (and consistent with Maine's first Subgrantee Selection Process), MCA continued to provide the option to applicants with the ability to identify locations that should be excluded due to the



characteristics of the location as it aligned with one of the reason codes. A number of locations were excluded by applicants, many of which were flagged as being extremely high cost, and these were separated from projects to reduce the overall cost of the project.

Throughout both Pre-BoB and BoB rounds, MCA applied the same objective review, and oversight procedures to all applications, ensuring a fair and transparent competition.

## 1.2 Fair, Open and Competitive Subgrantee Selection Process Narrative

*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.*

### FAIR

As described in MCA's Initial Proposal Volume II, MCA implemented a two-phase Subgrantee Selection process to ensure fairness, transparency, and consistency in the evaluation of applicants. The first phase, the Prospective Applicant Pre-Qualification Evaluation Application, assessed applicants' technical, financial, operational, and managerial capacity at the organizational level. This allowed MCA to establish a pool of eligible applicants and proactively confirm that all applications met BEAD and MCA minimum requirements before advancing to project-specific review. This step was distinct from the subsequent BEAD Project Application (BPA) review, where MCA verified that project proposals were complete and consistent with Pre-Qualification materials.

To safeguard against bias and arbitrary decision-making, MCA made all scoring matrices publicly available. A draft version of the pre-BoB matrix was circulated for comment during the Initial Proposal process, and the final was published on MCA's website upon NTIA's approval. All matrices were also included in BPA guidance, ensuring applicants understood the evaluation framework. MCA provided equal opportunities for clarification through Office Hours and monthly BEAD meetings, with all applicant questions documented and publicly answered in FAQ available on MCA's website.

MCA ensured consistency in scoring by requiring reviewers to follow standardized qualitative and quantitative rubrics. For interpretive questions, MCA developed and published guidelines that were available to both reviewers and applicants. External third-party support was engaged to confirm that applications, SOPs, and guidance aligned with federal regulations and the BEAD NOFO, further strengthening fairness and compliance. To address conflicts of interest, all reviewers signed contracts (if consultants), completed training, and disclosed any conflicts of interest. No conflicts were reported.

During the Benefit of the Bargain (BoB) round, these safeguards were expanded. In compliance with NTIA's June 6, 2025, Restructuring Policy Notice, non-statutory elements such as affordability plans, workforce practices, and climate considerations were removed from competitive scoring. Applicants were provided

equal access to the updated scoring rubric and evaluation guidance before further review. Consistency in training, oversight, and reviewer practice ensured fairness, objectivity, and public confidence in the integrity of the process.

## OPEN

MCA ensured that the Subgrantee Selection process was open and accessible to all eligible participants, providing clear public notice and opportunities for engagement. Pre-BoB, MCA released Pre-Qualification guidance on July 12, 2024, followed by a detailed overview on September 3, 2024. The Pre-Qualification window opened on September 18 and closed on October 19, 2024, resulting in 16 applicants qualifying, including two Low Earth Orbit satellite providers and several organizations with no prior MCA funding. This demonstrated MCA's commitment to inclusivity and openness to both traditional and non-traditional providers.

BEAD Project Application guidance was published on December 20, 2024, with the application window open from January 17 through March 7, 2025 (extended by one week to accommodate applicant requests). MCA promoted broad participation through monthly BEAD calls, a public Resource Exchange, and accessible instructional materials and infographics. Draft Project Service Areas (PSAs) were shared for feedback, enabling applicants and communities to shape their proposed projects. MCA worked to ensure that all application resources, including the grant portal and mapping tools, were as accessible and well-documented as possible to support providers with all types of expertise and resources.

For the Benefit of the Bargain round, MCA again prioritized openness by requiring all applicants to use updated materials reflecting the June 6, 2025, Restructuring Policy Notice. MCA announced the BoB round publicly via their monthly BEAD meeting, email, and social media, then released public guidance on July 3, 2025.

Pre-Qualification ran from July 10–16, 2025. Previously pre-qualified applicants were not required to resubmit unless their qualifications had materially changed, while new applicants had six days to submit Pre-Qualification materials. MCA issued Pre-Qualification determinations within 48 hours of submission to ensure applicants had timely access to BPA materials and mapping tools. The BPA submission deadline of July 24, 2025 (14 days from application release) applied uniformly to all applicants, providing a level playing field.

Throughout the post-BoB process, MCA used a consistent communication strategy to maximize transparency and accessibility. All applicants had uniform access to updated scoring rubrics, PSA maps, FAQs, and technical support through the MCA Resource Exchange and virtual office hours. MCA also published guidance clarifying how deconfliction, curing, and negotiations would operate under the restructured rules, ensuring applicants could prepare on equal terms.

To further reduce barriers, MCA applied the timelines across provider types, ensuring that no applicant faced unreasonable deadlines. Negotiation invitations were sent to all eligible applicants simultaneously, with agendas, counterproposals, and mapping tools provided in advance. MCA prohibited favoritism or selective

outreach by ensuring that all communication occurred through formal channels, and all substantive clarifications were published publicly.

## COMPETITIVE

MCA designed the process to ensure competitiveness by applying neutral criteria that did not favor one type of provider over another, beyond statutory requirements. Pre-BoB, the applicant pool included 16 diverse entities, from established ISPs to LEO providers and first-time MCA applicants.

Curing requests were applied consistently, with no applicant receiving fewer than two business days to respond. MCA proactively checked in with applicants to confirm they had adequate time and support. This prevented undue burden on any provider type and preserved a level playing field.

During the BoB round, competitiveness was reinforced by applying the same Pre-Qualification and BPA standards to both the 16 returning and one new applicants. The updated scoring rubric prioritized minimal BEAD outlay, with secondary scoring for bids that were within 15% cost of each other, adherent to NTIA-defined factors. Deconfliction of overlapping PSAs was conducted through transparent, structured negotiations in accordance with MCA's internal Negotiation & Selection SOP, with outcomes based on cost-effectiveness, statutory compliance, and evidentiary sufficiency, not provider identity. This ensured neutrality and competitiveness across all applicants.

## REVIEWERS

MCA implemented a structured and rigorous process to ensure reviewer qualifications, impartiality, and consistency. Reviewers were selected from MCA staff and consultants who were both credentialed and experienced in relevant disciplines. MCA formally evaluated resumes, conducted background checks, ensured completed vendor contracts addressed credentialing, and reviewed past work to certify subject matter expertise. Assignments were made by area of expertise, with an NCTI Master Technician and industry-recognized ISP/OSP Engineer reviewing network designs, financial experts assessing budgets, and other subject matter experts handling areas like managerial or compliance. Reviewers also signed disclosure forms attesting that they had no real or apparent conflicts of interest, consistent with federal requirements under 2 CFR 200.112 and 2 CFR 200.318. All reviewers completed training on MCA's SOPs, evaluation rubrics, and conflict-of-interest procedures, and they were required to disclose potential conflicts through the MCA Grants Portal.

To maintain impartiality, reviewers were prohibited from using application information for personal or professional gain and from contacting applicants outside official channels. Confidentiality obligations were emphasized in training, and MCA's Chief Operating Officer, Brian Allenby, conducted a final review of all applications before advancement to guarantee fairness and accuracy.

During the BoB round, these standards were formalized under the new program guidance. Reviewers and negotiators were required to sign the BEAD Negotiation and Selection SOP, which included a dedicated Conflict of Interest section supplementing MCA's broader policy and contractual language. By signing,

reviewers and negotiators certified that they were credentialed, free from financial or professional entanglements, and bound by confidentiality under Maine State Law §9207. In addition, third-party contractors who were neither reviewers nor negotiators supported the development of guidance documents, SOPs, and review tools, ensuring that the process remained consistent, defensible, and compliant with NTIA's Restructuring Policy Notice.

Through these safeguards, MCA ensured that all processes were conducted by trained, credentialed, and objective experts under rigorous oversight across both the pre- and post-BoB phases.

### 1.3 Subgrantee Selection Process Application Solicitation Narrative

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



The Maine Connectivity Authority (MCA) affirms that when no application was initially received, MCA followed a procedure consistent with the process approved in the Initial Proposal.

### 1.4 CAI List Revision

*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.*

To conform with Section 4 of the BEAD Restructuring Policy Notice, MCA conducted a thorough review of its existing Community Anchor Institution (CAI) list and removed any locations that did not meet the statutory definition established by the Infrastructure Act. MCA's final CAI list provided to applicants included only entities such as schools, libraries, health clinics, health centers, hospitals or other medical providers, public safety entities, institutions of higher education, public housing organizations, and community support organizations that facilitate greater use of broadband services by vulnerable populations, including low-income, unemployed, and aged individuals.

As part of this process, MCA removed any CAIs that had previously been included in additional categories approved in its Initial Proposal Volume I but that did not meet the statutory definition. In alignment with the BEAD Frequently Asked Questions and Answers Version 12, MCA only included community support organizations that are located in government-owned facilities providing publicly accessible Internet service and currently offering digital skills training. This methodology ensured that MCA's CAI list fully complied with statutory requirements and NTIA guidance, supporting broadband deployment to eligible institutions.

### **1.5 Subgrantee Record Keeping**

*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, the Maine Connectivity Authority will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including the retention of subgrantee records for a period of at least 3 years from the date of submission of the subgrantee's final expenditure report. These records will 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.



### Timeline for Implementation (Requirement 3)

#### 3.1 Measures to Ensure Timeliness of Project Completion

*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.*

To ensure timely project completion, MCA has implemented a series of robust measures designed to guarantee that each subgrantee will begin providing broadband service to customers within their project areas no later than four years from the date of subgrant award, and that all BEAD-funded activities are completed well within MCA's period of performance.

As part of the Subgrantee Selection Process, MCA required applicants to provide a detailed, compliant construction timeline as a condition of award. Applicants were evaluated on "speed to deployment" commitments during scoring, and MCA will hold subgrantees accountable to the timelines outlined in their approved applications. Fixed-amount subawards will be structured to match these timelines, with interim construction milestones explicitly defined in each project contract before execution. MCA will maintain a four-month desk and field auditing window following project completion to ensure that deliverables meet contractual and statutory requirements.

To support compliance, MCA subgrant agreements include clear remedies and penalties for non-performance or misuse of funds. These remedies may include additional award conditions, suspension of payments, award suspension, increased monitoring, grant termination, de-obligation of funds, clawback provisions, and debarment of organizations or personnel. Funds for deployment activities will only be disbursed for work compliant with subgrant terms, and MCA will withhold payments until identified issues are successfully cured.

MCA's oversight strategy combines orientation, ongoing monitoring, and technical assistance. Following award approval, each subgrantee participates in a subgrantee orientation to review their individualized project monitoring plan. MCA maintains one-on-one monthly check-ins with all subgrantees to track project performance, supplemented by desk reviews of required documentation and periodic field visits to verify deployment progress. All interactions, guidance, and updates are documented in an evergreen project monitoring record and in MCA's award management system, ensuring alignment with record retention policies.

Subgrantees are required to submit comprehensive Project and Expenditure Reports, including information on project status, expenditures, geospatial/mapping data, workforce plans, and subcontractor information.

MCA staff with subject matter expertise review all submissions to confirm compliance with timelines, quality standards, and federal reporting requirements. Performance Reports capturing project outputs and outcomes further reinforce accountability.

Finally, MCA affirms that all BEAD subgrant activities will be completed at least 120 days before the end of the program's period of performance, and that all programmatic BEAD grant activities undertaken directly by MCA, including via contracts, will conclude by the end of MCA's period of performance. This layered approach, combining contractual safeguards, rigorous monitoring, technical assistance, and structured reporting, ensures that all BEAD deployment activities are completed on time, in compliance with 2 C.F.R. § 200.344, and consistent with both pre- and post-BoB expectations.

### Oversight and Accountability Processes (Requirement 4)

#### 4.1 Public Waste, Fraud, and Abuse Hotline

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



Yes, the Maine Connectivity Authority utilizes the [State of Maine, Office of the State Auditor hotline](#).

#### 4.2 Monitoring Plans

*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.

To view these attachments, please go to [Maine BEAD Final Proposal Attachments](#) at <https://drive.google.com/drive/folders/1N07o9hBpdtSYI7miJDQYIEZZWoaGNkEG> and click on:

- [Requirement 4 \(Attachment\) - Monitoring Plan.pdf](#)
- [Requirement 4 \(Attachment\) - BEAD Grant Agreement PRELIMINARY PARTIAL.pdf](#)

#### 4.3 Subgrantee Agreement Certifications

*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 acknowledgement 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, the Maine Connectivity Authority certifies that its subgrant agreements will include all required components to comply with the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice.

## Local Coordination (Requirement 5)

### 5.1 Description of Public Comment Period

*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.*

This section will be completed following the conclusion of the public comment period.



## Challenge Process Results (Requirement 6)

### 6.1 State-Led Challenge Process Completion and Approval

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



Yes, the Maine Connectivity Authority certifies that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

### 6.2 Final Location Classification Lists

*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.*

To view these attachments, please go to [Maine BEAD Final Proposal Attachments](#) at <https://drive.google.com/drive/folders/1N07o9hBpdtSYI7miJDOYIEZZWoaGNkEG> and click on:

- [post\\_challenge\\_locations.csv](#)
- [CAI\\_locations.csv](#)

The Maine Connectivity Authority posted final location classifications (unserved/underserved) at [www.maineconnectivity.org/bead#slcp](http://www.maineconnectivity.org/bead#slcp) on November 14, 2024.

The Maine Connectivity Authority posted final location classifications (CAIs) at [www.maineconnectivity.org/bead#restructuring](http://www.maineconnectivity.org/bead#restructuring) on August 21, 2025.

## Unserved and Underserved Locations (Requirement 7)

### 7.1 Broadband Coverage of Unserved Locations

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



Yes, the Maine Connectivity Authority certifies that it will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified by MCA's NTIA-approved final list of eligible locations.

### 7.2 No Coverage Unserved Locations

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

Not Applicable

### 7.3 Support - No Coverage Unserved Locations (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

### 7.4 Broadband Coverage of Underserved Locations

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



Yes, the Maine Connectivity Authority certifies that it will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified by MCA's NTIA-approved final list of eligible locations.

### 7.5 No Coverage Underserved Locations

*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 Support - Underserved Locations (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 Certification - Reason Codes

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



Yes, the Maine Connectivity Authority certifies that it has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that MCA will utilize reason codes 1, 2, and 3 for the entire period of performance, and that MCA will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved final list of eligible locations through a BEAD project.

## 7.8 Enforceable Commitments

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



Yes, the Maine Connectivity Authority certifies that it has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that MCA was notified of and did not object to, and/or federally-funded awards for which MCA has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

## Implementation Status Of Plans For Cost And Barrier Reduction, Compliance With Labor Laws, Low-Cost Plans, And Network Reliability And Resilience (Requirement 11)

### 11.1 Implementation Status

*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.*

Since the submission and approval of the Initial Proposal, MCA has continued to reduce identified barriers, including pole attachments, workforce, permitting, interagency coordination, and ongoing community engagement. In the Initial Proposal, MCA detailed plans to address primary barriers by promoting the use of existing infrastructure and streamlining cost-effective access to poles. Additional barriers around the lack of middle mile infrastructure, the need for regional planning and deployment, access to capital at scale, and broadband workforce were noted. Activities to date have included:

**Existing Infrastructure Utilization:** MCA's "All In" programming model and strong relationships with both public and private partners have facilitated the utilization and extension of existing infrastructure in some areas with high concentrations of unserved locations. MCA's participation in Maine's Infrastructure Implementation Task Force and Artificial Intelligence Task Force have helped support ongoing collaboration with a variety of State agencies. Ongoing coordination via a Broadband Working Group, as well as a network of regional and tribal organizations, contributes to information sharing, technical assistance and shared best practices. Access to resilient and redundant network infrastructure to support expanded last mile connectivity was specifically identified as a key barrier to address. **Status: In Progress**

Progress includes the design and development of the NTIA-funded Maine Open Optical Statewide Enabling Network (MOOSE Net). MCA, the Maine Department of Transportation and the University of Maine System are collaborating to reduce barriers to expanded internet transport and exchange. Additionally, Maine's BEAD application sought comprehensive and proactive plans from providers to mitigate network outages, emphasizing preventive maintenance strategies, rapid response protocols, and transparent customer communication with regular updates during outages, ensuring compliance with the 48-hour average outage limit over a 365-day period. These measures were reviewed by technical experts. **Status: In Progress**

**Pole Attachments:** Working with the Maine Public Utilities Commission (MPUC), MCA has supported the development of a legislative report on the status and priority of an efficient and coordinated process to expedite utility pole access. Through MCA's companion report, Utility Pole Attachment Study for Broadband in Maine ([MCA - Utility Pole Attachment Study.pdf](#)), was completed in 2024. This report features a review of Maine practices, as well as of pole attachment regulatory frameworks and best practices in other jurisdictions. **Status: In Progress**



As an outcome of the study, MCA, in collaboration with the Utility Pole owners and attachers, is coordinating a Utility Pole Data Performance Working Group, which meets quarterly to facilitate information sharing and identify shared priorities for policy and practice. Sharing BEAD PSA's and overlaying with other significant infrastructure investments, such as Maine's middle mile network, will allow for a coordinated approach to reduce delays and costs for all parties. This use case further advances the central role of a shared database and the need for ongoing workforce development in data science. **Status: In Progress**

**Workforce:** Through a 2023 broadband industry assessment, MCA identified a variety of training, skill development and coordination opportunities to reduce the burden on Maine's broadband ecosystem. MCA continues to work with the Maine Community College System to support a certified fiber technician training program. **Status: In Progress**

**Access to Capital:** While identified as a potential barrier in the Broadband Action Plan, the combined federal subsidies, including BEAD, have enabled sufficient capital markets for competitive BEAD applications and necessary applicant match. MCA's coordination of a Broadband Infrastructure Capital Markets Taskforce served as a helpful input into the Broadband Action Plan and overall methodology informing BEAD PSAs. **Status: In Progress**

**Permitting:** MCA shared NTIA permitting best practices and materials, and required applicants to describe their experience performing environmental review and permitting obligations that comply with applicable Federal, State, Tribal and Local laws. These topics, and others, were also covered during MCA's BEAD Monthly Update Information Sessions and the regularly scheduled Office Hours for Applicants. Additional information about MCA's approach to Environmental and Historical Preservation requirements is included in Requirement 14. **Status: In Progress**

## 11.2 Compliance with Laws

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



Yes, the Maine Connectivity Authority certifies that it required subgrantees to certify compliance with existing federal labor and employment laws.

## 11.3 Explanation - Compliance with Laws

*If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.*

Not Applicable

### 11.4 Low-Cost Broadband Service Option

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



Yes, the Maine Connectivity Authority certifies that all selected subgrantees will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

### 11.5 Explanation - Low-Cost Broadband Service Option

*If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period, explain why the Eligible Entity was unable to do so.*

Not Applicable

### 11.6 Reliability and Resilience

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



Yes, the Maine Connectivity Authority certifies that it focused on ensuring the reliability and resilience of the BEAD-funded broadband infrastructure when selecting subgrantees.

### 11.7 Explanation - Reliability and Resilience

*If the Eligible Entity does not certify that 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 Priority Projects

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

As required in the RPN, MCA defines a priority broadband project as: “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.”

Any applicant could request that MCA designate its project as a Priority Broadband Project by providing an affirmative response to the relevant question in the BEAD Project Application, regardless of the technology proposed. Applicants seeking Priority Broadband Project designation were required to provide documentation sufficient for MCA to assess their project application. This documentation allowed MCA to determine whether the proposed network architecture for each project met the statutory standards set out by the following priority criteria questions in the BEAD Project Application:

- *BEAD Program Technical Compliance:* Please certify that the applicant’s project delivers broadband service with minimum speeds of 100 Mbps download, 20 Mbps upload, and latency of 100 milliseconds or less in accordance.
- *Priority Broadband Scalability Narrative #1:* Please explain how the proposed project can easily scale speeds over time to meet the evolving connectivity needs of households and businesses. For instance, please provide the conditions that would trigger network performance upgrades and describe the process for implementing enhanced service capabilities.
- *Priority Broadband Scalability Narrative #2:* Please explain how the proposed project can scale to support the deployment of 5G and successor wireless technologies. For instance, does the applicant’s project include additional or convertible transport capacity to enable deployment of emerging broadband technologies such as 5G and future wireless services?

Upon receiving completed BEAD Project Applications, MCA conducted an initial screening to determine whether the applicant provided information sufficient for MCA to evaluate the applicant’s priority broadband project claim. This initial screening included verification that a Professional Engineer certified the capability of the network to deliver 100/20 Mbps service with latency less than or equal to 100ms, provided specific information regarding the capabilities of the network in the high-level design (HLD) and responded to the questions above.

MCA then completed a priority broadband project assessment based on the applicant’s response to the above questions against MCA’s priority broadband project definition. Applicants were required to articulate

and document the proposed High Level Design in support of their responses to the priority criteria questions above. An application for a single project area was assessed with the characteristics of only that project area in mind, while a statewide application was evaluated on a statewide basis, allowing for each applicant to receive fair and equal consideration based upon the merits of their project application(s).

The technical review process determined the physical considerations for each project, focusing on geography, climate, state-wide capacity, density, and, most importantly, scalability:

- **Geography and Climate:** MCA assessed the impact of terrain and climate on service availability, including the effects of tree canopy and accumulated snowfall.
- **State-Wide Capacity & Density:** MCA's review considered current and future spectrum availability, potential customer demand based on population growth, and the influence of high-density areas and zoning regulations.
- **Scalability:** MCA closely examined how existing and future wireless backhaul, including 5G, affects residential end-user capacity to ensure our solutions can grow with demand.

Results of the technical review process informed MCA's assessment of the totality of each application's priority broadband project claim and the fulfillment of all criteria provided. As a result, MCA exercised the authority conveyed to Eligible Entities to determine any given project's priority designation.

Project priority designation required that a proposed project demonstrate: fulfillment of RPN criteria for a priority broadband project based on the totality of the circumstances; the applicant's response to the Priority Criteria questions; and sufficient resolution of geospatial and technical considerations for each proposed project.

The fp\_deployment\_projects.csv file identifies those projects that MCA determined were priority broadband projects, and is attached as [fp\\_deployment\\_projects.csv](#).

## Subgrantee Selection Certification (Requirement 13)

### 13.1 Commitment Range

*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.*

As required by the RPN, MCA used the following criteria to first assess Priority Broadband Project applications. If MCA did not receive a Priority Broadband Project for a project area, or if the cost of the Priority Broadband Project was excessive, MCA then assessed non-Priority Broadband Project applications.

**Primary Criteria:** In deciding among competing applications covering the same general project area, MCA chose the option with the lowest cost based on minimal BEAD program outlay. MCA selected the combination of project proposals with the lowest overall cost to the BEAD program. When comparing competing proposals, MCA assessed total BEAD funding required to complete the project on an average per-location cost basis. This also included any associated costs required to serve individual locations that had been removed from a project by an applicant due to high cost.

**Secondary Criteria:** If an application to serve the same general project area proposed a project cost within 15% of the lowest-cost proposal received for that same general project area on a per BSL basis, MCA evaluated such competing applications based on the following three criteria:

1. **Speed to Deployment:** MCA awarded 20 points if the applicant made a credible, binding commitment to complete their project within 24 months after permitting approval.
2. **Speed of Network and Other Technical Capabilities:** MCA awarded up to 40 points based on the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.
3. **Preliminary/Provisional Subgrantee Status:** MCA awarded 40 points for applications where MCA identified preliminary or provisional subgrantees in the March 2025 BPA Round.

All preliminarily awarded projects, including non-priority projects, meet the speed and latency requirements of the NOFO.



## Environmental and Historic Preservation (EHP) Documentation (Requirement 14)

### 14.1 EHP and NEPA Compliance

Submit a document which includes the following:

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

To view these attachments, please go to [Maine BEAD Final Proposal Attachments](#) at <https://drive.google.com/drive/folders/1N07o9hBpdtSYI7miJDQYIEZZWoaGNkEG> and click on:

- [Requirement 14 \(Attachment\) - Environmental and Historic Preservation \(EHP\) Documentation.pdf](#)
- [Requirement 14 \(Attachment\) - FirstNet Regional Programmatic Environmental Impact Statement \(PEIS\) Revalidation.pdf](#)

### Consent from Tribal Entities (Requirement 15)

#### 15.1 Tribal Government Resolution(s) of Consent (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.*

To view these attachments, please go to [Maine BEAD Final Proposal Attachments](#) at <https://drive.google.com/drive/folders/1N07o9hBpdtSYI7miJDQYIEZZWoaGNkEG> and click on:

- [Requirement 15 \(Attachment\) - Passamaquoddy Tribe, Indian Township.pdf](#)
- [Requirement 15 \(Attachment\)- Houlton Band of Maliseet Indians.pdf](#)
- [Requirement 15 \(Attachment\) - Passamaquoddy Tribe, Pleasant Point.pdf](#)

## Prohibition on Excluding Provider (Requirement 16)

### 16.1 Certification of Inclusion

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



Yes, the Maine Connectivity Authority 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, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii).

## Waivers and Public Comment (Requirement 17)

### 17.1 Waivers

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

Not Applicable

### 17.2 Waiver Documentation Upload(s) (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.*

Not Applicable