

Broadband Equity Access and Deployment Program

Initial Proposal - Volume 2



OKLAHOMA
Broadband Office

Overview

The Oklahoma Broadband Office has published the following sections of the Initial Proposal, as required under the Broadband Equity, Access, and Deployment Program (BEAD). These sections serve as Volume 2 of the Initial Proposal.

This document reflects the version to be submitted to the National Telecommunications and Information Association (NTIA) for consideration after the public comment period. This document does not reflect the final version, which may include additional edits as requested by NTIA to be in compliance with the BEAD Program.

The section numbers below correspond with the according sections guides and templates published for submission by NTIA and corresponds with Notice of Funding Sections 1, 2, 4, and 8-20.

Note: *This document is intended solely to assist recipients in better understanding BEAD Initial Proposal and the requirements set forth in the Notice of Funding Opportunity for this program. This document is not intended to supersede, modify or otherwise alter applicable statutory or regulatory requirements or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in this document.*

INTERNET FOR ALL

Initial Proposal

Volume II

Oklahoma



U.S. Department of Commerce
National Telecommunications and Information Administration

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Volume II Initial Proposal Requirements

2.1 Objectives (Requirement 1)

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

The current Oklahoma Broadband Office (OBO) was created by [HB 3363 of 2022](#), lasting until June 30, 2028, to be governed by the Broadband Governing Board and advised by the Broadband Expansion Council, with an ambitious mandate that includes creating and maintaining a Statewide Broadband Plan that “shall include, but not be limited to, detailing a pathway for ninety-five percent (95%) of the state’s population to be adequately served by June 30, 2028.”

This mandate resembles, yet is imperfectly aligned with, the goals and timeframes of the Broadband, Equity, Access, and Deployment (BEAD) program. It seems, however, the OBO can satisfy both by adopting the more ambitious of the two mandates in each case.

Thus, instead of HB 3633’s goal of 95%, the OBO must aim for 100% coverage to satisfy BEAD. But the HB 3633 target date of June 30, 2028, is earlier than the BEAD deadline will fall. However, the OBO might use its discretion within the BEAD program framework to target 100% coverage early, by June 30, 2028, thus meeting its state-defined goals while still beating the BEAD deadline.

The OBO tentatively proposes to do this and target 100% complete deployment by June 30, 2028, a few months in advance of the BEAD deadline. However, an alternative approach to reconciling the timelines would be to set 95% coverage as a milestone to be achieved by June 30, 2028, on the way to 100% coverage in 2029. It’s not clear, however, how the statewide milestone would be enforced against specific BEAD subgrantees, many of whom might want the extra time to complete their deployments. Therefore, for the sake of clarity and simplicity, we set a goal of 100% complete state coverage by the date of June 30, 2028, that was defined in HB 3633, with the option of adjusting this if state law changes.

Within the vision of universal broadband access, certain priorities and definitions have been settled by the NTIA, and Oklahoma embraces this more detailed BEAD vision.

Priority Objective #1: Expand Broadband Availability

1a: Provide broadband to all unserved addresses in Oklahoma.

2a: Provide broadband service to all underserved addresses in Oklahoma.

First, broadband is still defined by the FCC as 25/3, which is arguably adequate for most everyday online functions. Therefore, areas lacking even 25/3 broadband access are the top priority for broadband expansion. However, infrastructure investment should look to the future, and rising data demand will foreseeably make 25/3 increasingly inadequate over time. Therefore, new deployments in these areas should not offer merely 25/3, but 100/20, the speed standard targeted by the BEAD program.

Once all unserved areas are on track to be served, the state can proceed to target underserved areas that have 25/3 but lack 100/20. There, too, the BEAD program will seek upgrades that raise speed to at least 100/20.

Since broadband technologies differ across many performance factors, not just speed, and these become complex to quantitatively define, the NTIA has retreated somewhat from the tradition of technology neutrality in broadband grantmaking and adopted an explicit scheme of technological prioritization, which Oklahoma will follow, targeting first end-to-end fiber, then, where it is too costly, looking for less expensive alternatives such as cable (hybrid fiber-coax-HFC) systems, DSL, and fixed wireless using licensed spectrum, but not satellite or fixed wireless using unlicensed spectrum unless cable, DSL, and licensed fixed wireless are also too expensive. These technologies, although their widespread availability is certainly welcome, often do not reliably meet the performance standards necessary for full participation in the 21st century society and economy, and therefore should not be the only options for internet service.

Priority Objective #2: Provide Support to Community Anchor Institutions (CAIs)

2a: Provide broadband service to the CAIs.

A secondary goal is to ensure that CAIs should enjoy a faster service standard than what is normative for private households and ordinary businesses. CAIs can help non-subscribers to home internet service get occasional access, as well as meet the needs of people on the go or provide help, training, and coaching for people who lack basic digital skills and struggle to use the internet on their own. CAIs may need to accommodate many users at the same time, so it's appropriate, and in the public interest, that they receive greater speed.

Based on statutory definition of "community anchor institutions" as defined in 47 USC 1702 (a)(2)(E), the broadband office applied the definition of "community anchor institution" to mean a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization (including any public housing agency, HUD-assisted housing organization, or Tribal housing organization), or community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, children, the incarcerated, and aged individuals.

The incarcerated are the only group not listed in the original definition that are explicitly added into Oklahoma's list of community anchor institutions. According to the National Institute of Corrections, in 2020 Oklahoma had 93 jails in 77 counties, with the 2020 jail population as 10,670 incarcerated and overall prison population was 22,462. Criminal Justice System Statistics in Oklahoma 2020, National Institute of Corrections (2020).

Due to the high number of incarcerations in Oklahoma, this population shall be included to ensure equity and inclusion. State owned prisons will be included in Oklahoma's list of community anchor institutions as there are existing and emerging digital literacy programs within several of the prison locations.

OBO utilized information from Homeland Infrastructure Foundation-Level Data to identify the following CAIs:

- **Schools:** The list includes K-12 public and private schools, childcare centers, early learning centers, off-reservation boarding schools, tribal and non-tribal head start entities.
Libraries

- **Local, state, federal or tribal government building listing:** The list includes tribal headquarters (from OKMaps.org/ogi/search.aspx), courthouses, prisons, community correction offices, conservation district offices (from the Oklahoma Conservation Commission).
- **Health clinic, health center, hospital, or other medical providers:** The list includes hospitals, nursing homes, assisted living, public health departments, urgent care facilities, veteran’s medical facilities, and Indian Health Services.
- **Public safety entity:** The list includes EMS, fire stations, emergency communication centers, and law enforcement.
- **Institutions of higher education.** The list includes public and private colleges, community colleges, and technology centers.
Public housing organizations
- **Community support organization:** The list includes places of worship, community centers, senior centers, workforce centers, veteran centers, economic opportunity entities, YMCA’s, etc.

Data for CAI locations was obtained from the Oklahoma GIS Department and the FCC Broadband map.

Priority Objective #3: Encourage Broadband Affordability

3a: Work with Internet Service Providers (ISPs) to make broadband more affordable.

3b: Encourage participation in programs such as Lifeline and ACP.

3c: Encourage competition among broadband providers where applicable.

Other objectives include making internet service more affordable, both by inducing ISPs to charge less, especially for low-income consumers when possible, and by encouraging people in need to participate in programs such as Lifeline and ACP. While the OBO plans to avoid subsidizing competitors that serve the same area, as this can be inefficient and cause projects to fail due to competition eroding the business case, competition is still welcomed in general. The OBO will actively seek ways to encourage it.

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

- 2.2.1 **Text Box:** Identify and outline steps that the Eligible Entity will take to support local, Tribal, and regional broadband planning processes or ongoing efforts to deploy broadband or close the digital divide. In the description, include how the Eligible Entity

will coordinate its own planning efforts with the broadband planning processes of local and Tribal Governments, and other local, Tribal, and regional entities. Eligible Entities may directly copy descriptions in their Five-Year Action Plans.

The OBO developed and implemented an inclusive engagement model that provided opportunities for residents, organizations, and leaders across the state to provide insight into planning priorities. Leveraging existing structures, such as the Oklahoma Broadband Governing Board (OBGB) and the Oklahoma Broadband Expansion Council (OBEC), and expanding outreach in coordination with state agencies, local and regional governments, CAIs, and community-serving organizations providing services to covered populations, the OBO gleaned a holistic understanding of broadband challenges, assets, and priorities across Oklahoma. This engagement allowed the BDO to understand local and regional plans and priorities for broadband and incorporate as appropriate in this Initial Proposal. This coordination, further described in section 2.3, allowed for robust data collection and feedback that informed BEAD and Digital Equity (DE) planning documents.

The OBO engaged local and regional governments throughout the process, including in individual meetings, listening tour stops, and other outreach efforts. Data from local planning and broadband infrastructure projects informed the development of this Initial Proposal.

Tribal Consultations

From April 2023 through August 2023, the OBO engaged all 39 tribal nations with communications and invitations to attend tribal consultations. Both in-person, individual tribal consultations, along with two statewide consultations gleaned important insights into the unique perspectives, needs, and challenges of Oklahoma's tribal nations. Key takeaways from these consultations include:

- Within the tribes, there is a digital divide between some who have tribal-owned ISPs, and those who do not, and some who have made connections with workforce education resources and those who have not (OSU IT and Career Tech were named as available resources at several listening tour stops). Many tribes desire more fiber technicians and installers.
- Of the tribes that do not have tribal-owned ISPs, they wish to work cooperatively and in collaboration with existing ISPs in their territories.
- The cost of laying fiber is very expensive (this is something we have heard from ISPs across the state at most listening tour stops).
- Several of the tribes do not have sufficient grant writing experience in-house, which led to their first attempts at securing Tribal Broadband Connectivity Program funding being denied.
- Several tribes desire to use BEAD funding to connect non-tribal households.
- Some tribes expressed concern for ongoing equipment and maintenance of infrastructure into the future.
- Digital equity needs expressed include:
 - Home computer assistance;
 - Digital navigators in libraries, tribal community centers, or CAIs to provide digital skills training, and/or tech mobiles that could visit smaller communities to train people;
 - Telehealth resources; and
 - Remote work opportunities.

The OBO sought and received written feedback from Oklahoma's tribal nations in the development and drafting of the Five-Year Action Plan. This feedback was incorporated into both the Five-Year Action Plan

and relevant sections of this Initial Proposal.

2.3 Local Coordination (Requirement 4)

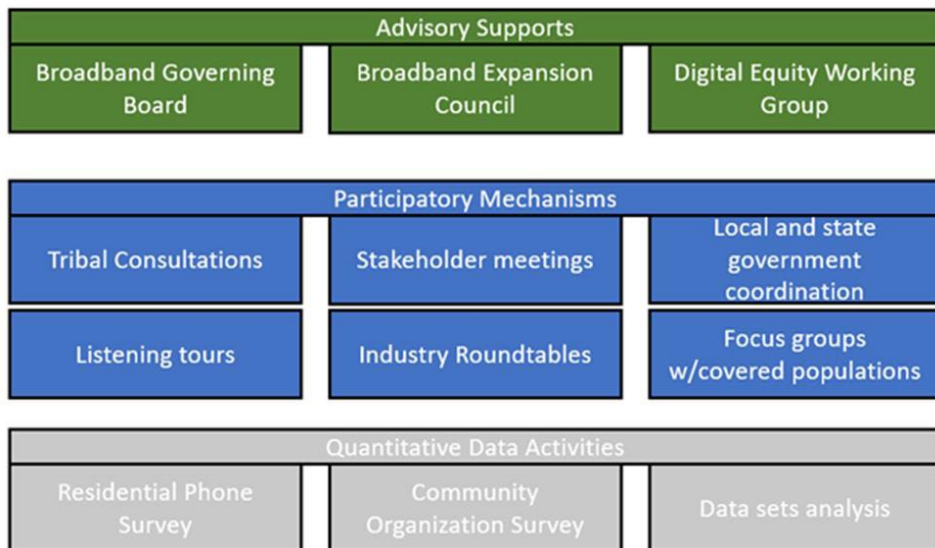
2.3.1 **Text Box:** Describe the coordination conducted, summarize the impact such coordination has on the content of the Initial Proposal, and detail ongoing coordination efforts. Set forth the plan for how the Eligible Entity will fulfil the coordination associated with its Final Proposal.

To fully engage with all members of the community, the OBO used a broad array of data collection and engagement methods. At the beginning of the process, the OBO traveled more than 6,000 miles across Oklahoma on a “Let’s Get Digital: Oklahoma Broadband Tour” listening tour that included 19 separate locations. The OBO presented information to the public on the state of broadband expansion and asked participants to fill out surveys identifying common issues and areas of focus for further engagement. The OBO also engaged all 39 tribal nations with communications and invitations to attend tribal consultations to gain their unique perspective. While many of the connectivity issues within Tribal communities are similar to the rest of the state (affordability and access), the same outreach efforts and solutions are not necessarily applicable due to differences in cultural norms and organizational structure. More details on the OBO’s stakeholder engagement process are outlined below.

Local Coordination

The stakeholder engagement process outlined in this section demonstrates the breadth of engagement across Oklahoma and the variety of mechanisms for outreach and engagement. This work included identifying and engaging with critical stakeholders with whom understanding of BEAD and DE priorities is essential to a holistic understanding of connectivity challenges and opportunities in the state.

The engagement model the OBO developed to engage with stakeholders during the planning and implementation phases of the BEAD program aligns with local coordination criteria from the BEAD NOFO.



While a full description of outreach activities occurs in this section, highlights from the strategies to address each of these criteria include:

- **Full geographic coverage** – The OBO visited 19 sites during its "Let’s Get Digital: Oklahoma

Broadband Tour”, with stops in all parts of the state. A map of visited counties is below. Additionally, the OBO visited an additional nine sites in October and November to discuss and share about the planning and implementation work of the office.

- **Meaningful engagement and outreach to diverse stakeholder groups** – The OBO developed and engaged with a diverse group of organizations, governments, and leaders representing covered populations. Through focus groups, a statewide listening tour, survey collection, and interviews, the OBO learned about barriers to access, adoption, and use for diverse stakeholders. Additionally, the OBO hosted tribal consultations with tribal governments in the state.
- **Utilization of multiple awareness and participatory mechanisms** – The OBO leveraged digital and non-digital means of communication for education and outreach purposes. These mechanisms included meetings, surveys, emails, TV/radio/print interviews, social media, focus groups, and more to ensure that stakeholders could engage with the planning process and were informed of the OBO’s work.
- **Clear policies to ensure transparency** – The OBO operated transparently throughout the planning process, utilizing its website, email distribution lists, and monthly updates to the OBGB and OBEC to provide updates to stakeholders and promote opportunities to engage in the process. The OBO maintained and updated the outreach page on its website with information about listening tour stops, roundtables, and local coordination events. Listening tour stops were open to the public and media, and were promoted through social media, as well as statewide and local press releases.
- **Outreach and engagement of unserved and underserved communities** – The OBO prioritized outreach and made substantial efforts to engage with unserved and underserved communities. Entities representing these populations participate in the Digital Equity Coalition. The OBO conducted focus groups with underrepresented populations and surveyed these populations in the residential survey. The OBO also specifically focused on unserved and underserved communities during these engagement efforts to better understand the places and people who will be most affected by the BEAD program.

Stakeholders

Having access to a reliable, affordable broadband connection is critical for Oklahoma residents and is a requirement for many governmental and private-sector activities. The OBO identified a wide range of stakeholders for outreach and engagement to demonstrate geographic coverage and interaction with diverse groups, as provided by the local coordination requirements of the BEAD Program NOFO.

Key stakeholder groups include:

- State agencies
- CAIs
- Nonprofit and faith-based organizations serving underrepresented and covered populations
- Tribal governments
- Local and municipal government leaders
- Civil rights organizations
- Labor unions
- Residents that lack access to affordable, reliable high-speed internet or the skills to use it in ways that improve their quality of life.

Advisory Supports

The Oklahoma Broadband Governing Board (OBGB) oversees the work of the OBO. Members of the board include:

- Katy Boren, CEO, Oklahoma City Innovation District Inc. – Oklahoma City
- Mike Erhart, Managing Partner, Erhart & Associates LLC – Oklahoma City
- Dwight Hughes, Superintendent/CEO, Autry Technology Center – Enid
- Fob Jones, Attorney, Fob F. Jones Law – Sulphur
- Jim Meek, District 9 Director, The Oklahoma Farm Bureau Inc. – Okmulgee
- Amanda Mullins, Managing Attorney, Amanda Mullins PLLC – Chickasha
- Matt Pinnell, Lieutenant Governor – Oklahoma City
- Todd Russ, State Treasurer – Cordell
- Russ Teubner, CEO, HostBridge Technology LLC – Stillwater

The Oklahoma Broadband Expansion Council (OBEC) advises the OBO and provides recommendations for policies that can improve, expand, and reduce the cost of high-speed internet in the state. Members of the council include:

- Mark Argenbright, Director, Public Utility Division & Consumer Services, Oklahoma Corporation Commission - Oklahoma City
- Darlene Brugnoli, Vice President Governmental Affairs, Verizon
- Jason Constable, Director, Regulatory Affairs, AT&T Corp. - Oklahoma City
- Sachin Gupta, Director of Government Business and Economic Development, Centranet LLC - Stillwater
- Mike Hilliary, Chief Administrative Officer, Hilliary Communications - Lawton
- Ernie Martens, Mayor, City of Sallisaw - Sallisaw
- Stacie Pace, Associate Director, Canopy Healthtech - Owasso
- Mike Sanders, Executive Director - Kingfisher
- Josh Snow, President, Trace Fiber Networks LLC - Ada
- Robbie Squires, Director of Government & Regulatory Affairs, Cox Oklahoma Telecom LLC - Yukon
- Billy Frank Staggs, President, Chickasaw Holding Co. - Sulphur
- Daniel Webster, CEO, Northeast Oklahoma Electric Cooperative - Vinita
- Jerry Whisenhunt, General Manager, Pine Telephone Co. Inc. - Broken Bow
- Dr. Brian Whitacre, Professor of Agricultural Economics, Oklahoma State University, Department of Agriculture Economics - Stillwater

The Oklahoma Digital Equity Coalition provides insight on barriers to accessing and using affordable, reliable high-speed internet for covered populations. Members of this group include:

- Urban League of Greater OKC
- Oklahoma Department of Libraries
- Southern Prairie Library System
- Oklahoma Complete Health
- Heartland Forward
- YWCA
- Hinton Public Library
- Oklahoma State University

- Oklahoma Department of Career and Technology Education
- Bristow Public Library
- OU Health

Participatory Mechanisms & Outreach Activities

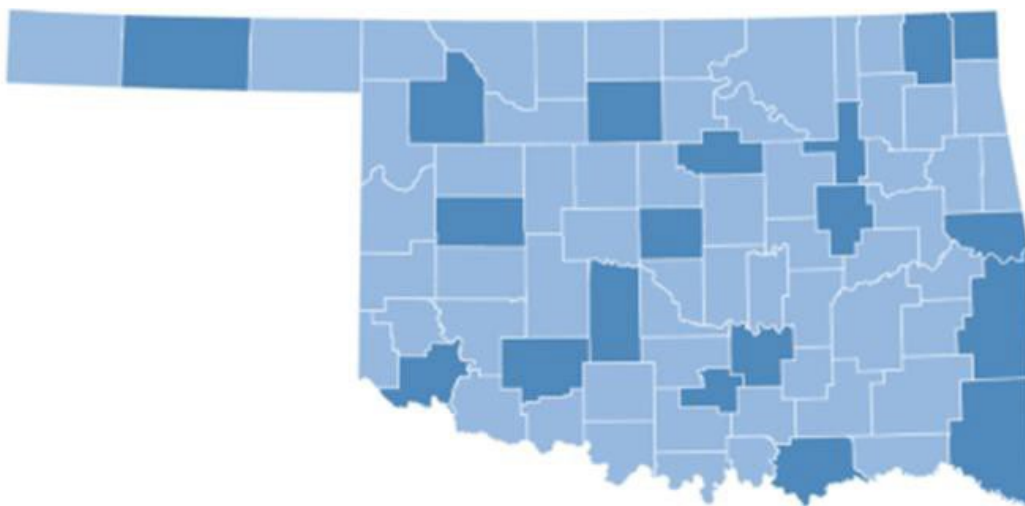
The OBO engaged with stakeholders by utilizing multiple awareness and participatory mechanisms. Through these mechanisms, the OBO ensured the public was aware of ongoing planning efforts and could provide feedback to the OBO on connectivity challenges and opportunities. Key outreach platforms and mechanisms included:

- Statewide listening tour
- Focus groups
- Roundtables
- Tribal consultations
- Site visits
- Organizational and residential surveys
- Email updates
- Board meeting updates
- Press releases
- Social media
- TV, radio, and print interviews
- Partnerships with organizations across the state

This variety of engagement activities, with a combination of digital and in-person opportunities, provided stakeholders clear ways to share their connectivity priorities. Several of these mechanisms are described in more detail below.

Statewide Listening Tour

The OBO hosted a 19-session “Let’s Get Digital: Oklahoma Broadband Tour,” traveling the state and hosting public meetings in libraries, university campuses, veterans’ halls, and other local venues, to hear from communities about regional needs and priorities.



The OBO visited the following communities:

- Weatherford (May 8, 2023)
- Stillwater (May 12, 2023)
- Vinita (May 15, 2023)
- Poteau (May 16, 2023)
- Broken Bow (May 18, 2023)
- Oklahoma City (May 22, 2023)
- Durant (May 23, 2023)
- Tulsa (May 24, 2023)
- Chickasha (May 26, 2023)
- Altus (June 2, 2023)
- Enid (June 5, 2023)
- Sallisaw (June 6, 2023)
- Miami (June 7, 2023)
- Sulphur (June 8, 2023)
- Lawton (June 9, 2023)
- Ada (June 13, 2023)
- Okmulgee (June 20, 2023)
- Goodwell (June 22, 2023)
- Woodward (July 18, 2023)

Understanding local context, including assets and success stories from the region, as well as pain points and needs, provided the understanding necessary to craft this plan. The tour incorporated interactive polling to collect quantitative data for analysis, aggregation, and comparison across the regions. Through guided discussion, participants elucidated key barriers, regional assets, and top priorities for the state. Several Broadband Governing Board members promoted and attended these events, often as co-facilitators.

Outreach to local and regional governments, nonprofits, and CAIs ensured diverse participation and reach to covered populations. An outreach toolkit, with sample social media, email/newsletter language, and flyer, allowed organizations to promote these events within their networks. The OBO staff participated in multiple regional and statewide media interviews to promote the listening tour and to ensure that residents were aware of the meetings.

Overall, 299 Oklahomans participated in one of the listening tour stops. Covered population representation at the tour was as follows:

Aging individuals	40.4%
Incarcerated Individuals	12.7%
Veterans	32.4%
People with disabilities	31.8%
Individuals with a language barrier	28.4%

Racial and ethnic minorities	33.8%
Individuals who reside in a rural area	56.2%
Low-income individuals	42.1%

Critical stakeholders to BEAD program implementation, including ISPs, local governments, and CAIs, attended these regional events to share their perspectives on connectivity challenges, opportunities, and current and planned partnerships. Representation by organization type on the tour was:

Representing an ISP	24.7%
Representing a government agency	19.4%
Attending as a resident interested in home internet news and service options	15.4%
Representing a for-profit business	12.0%
Representing a nonprofit organization	8.4%
Other	5.7%
Representing a college, university, or other institution of higher (post-secondary) learning	5.7%
Representing a library	2.7%
Representing a tribal government	2.7%
Representing a hospital, doctor’s office, or other health care provider	2.0%
Representing a K-12 school or school system	1.7%

The OBO, as a new state agency, leveraged this listening tour to educate communities about the work of the office, make introductions to key leadership and staff, and build relationships with local networks to support the OBO during the planning and implementation phases of the Digital Equity Plan.

Additionally, the OBO collected quantitative and qualitative data from participants, allowing for identification of key barriers and challenges by region, as discussed in the BEAD Five-Year Action Plan.

Internet Service Provider Roundtables

Internet service providers and other companies in broadband-related industries are important constituents in the work of ensuring affordable internet access for all. The OBO hosted an industry roundtable on June 15, 2023, to engage with ISPs on key aspects of BEAD and DE planning. Thirty representatives joined the call, with a provider type breakdown of:

- Telephone company - 20%
- Electric cooperative - 12%
- Investor-owned utility - 16%
- Private business - 48%

- Other - 4%

The roundtable engaged on various BEAD policy decision points, providing feedback to the OBO on workforce priorities, low-cost options, and ways to ensure universal coverage through implementation of the BEAD program.

The OBO intends to continue this engagement with regular roundtable discussions open to all ISPs.

Surveys

The OBO conducted a residential survey to gain deeper understanding of the barriers and assets in the state. Respondents were contacted over the phone for their participation; the dialer offered the survey in English, Spanish, or Mandarin, and it took an average of eight and a half minutes to complete. Roughly 34% of individuals contacted to participate in the survey completed it. The survey ran from July 10 to August 18, 2023, and ultimately collected information from 1,802 Oklahomans living all around the state.

Responses from this survey reflect diverse perspectives with varying experiences and concerns.

Individuals over the age of 60 made up almost a third (31.6%) of respondents. About a quarter of respondents (24.6%) identified themselves as a racial or ethnic minority. Nearly one in five respondents (17.4%) came from low-income households – defined as at or below 150% of the federal poverty threshold. The survey also gathered information from other federally recognized covered populations, including persons with disabilities, individuals with language barriers, veterans, and people who reside in rural areas.

Local Coordination Workshops

The OBO hosted two local coordination meetings during the planning process. The OBO, in partnership with NTIA, hosted an “Internet for All: Oklahoma Local and Tribal Nation Coordination Workshop” in Oklahoma City on January 19, 2023. The event brought together key participants in Oklahoma from federal, state, tribal, and local governments, industry, and other important stakeholders to discuss coordination on broadband efforts as the state prepares to receive significant broadband funds from the IIJA.

The OBO hosted a follow-up event in Tulsa on May 24, 2023, to provide updates on workforce priorities, tribal nation engagement, and funding programs. At this event, two roundtables were held: workforce and tribal coordination. A key takeaway from the workforce panel highlighted the opportunity available for Oklahomans to receive training as fiber technicians, yet ISPs lack enough funding to hire these highly trained individuals upon completion of their training programs.

Impact of Engagement

All these local coordination activities allowed the OBO to engage with communities and industries about the barriers they face accessing and using the internet and what their priorities are for BEAD and DE planning and implementation. Having these diverse perspectives supported the OBO as they drafted this Initial Proposal to meet the needs of Oklahomans and deliver on the programmatic goal of universal service. Feedback and insights gained from each of these stakeholder engagement activities informed the development of the policies in this document.

Ongoing Engagement

The OBO will continue to build on its stakeholder engagement experience and evolving relationships to maintain a participatory policymaking and program administration process to the extent feasible, with the

understanding that (a) decision input windows must sometimes close when the OBO has set a course and begun to take action, and also (b) the interest and willingness to participate of various stakeholder groups and organizations will wax and wane. Stakeholder engagement priorities will shift over the life cycle of the BEAD program, with program design, challenge process, subgrantee selection, project monitoring and project closeout all requiring different kinds of communication with and input from industry, local government, other state agencies and citizens.

The OBO plans to continue stakeholder engagement and outreach through many of these established advisory groups and communications channels, including regularly convening the Digital Equity Coalition and Internet Service Provider Roundtable. This will ensure ongoing awareness of, and participation in, the OBO's work from stakeholder groups, local governments, tribal nations, and communities.

To monitor agreements and subrecipient progress, the OBO will hold weekly check-ins and in-depth quarterly meetings. This information will be aggregated and submitted to the Treasury Department in the OBO's semi-annual reports. The OBO will also continue working with, and collecting data from, outreach partners on an as-needed basis.

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

Appendix C

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

The OBO sent a "Dear Tribal Leader" letter to each of the 39 Tribal Nations in Oklahoma. The OBO conducted tribal consultations, through a mix of individual and statewide meetings, throughout the engagement process. See Appendix B

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

Appendix B

2.4 Deployment Subgrantee Selection (Requirement 8)

Deployment Projects Subgrantee Selection Process & Scoring Approach

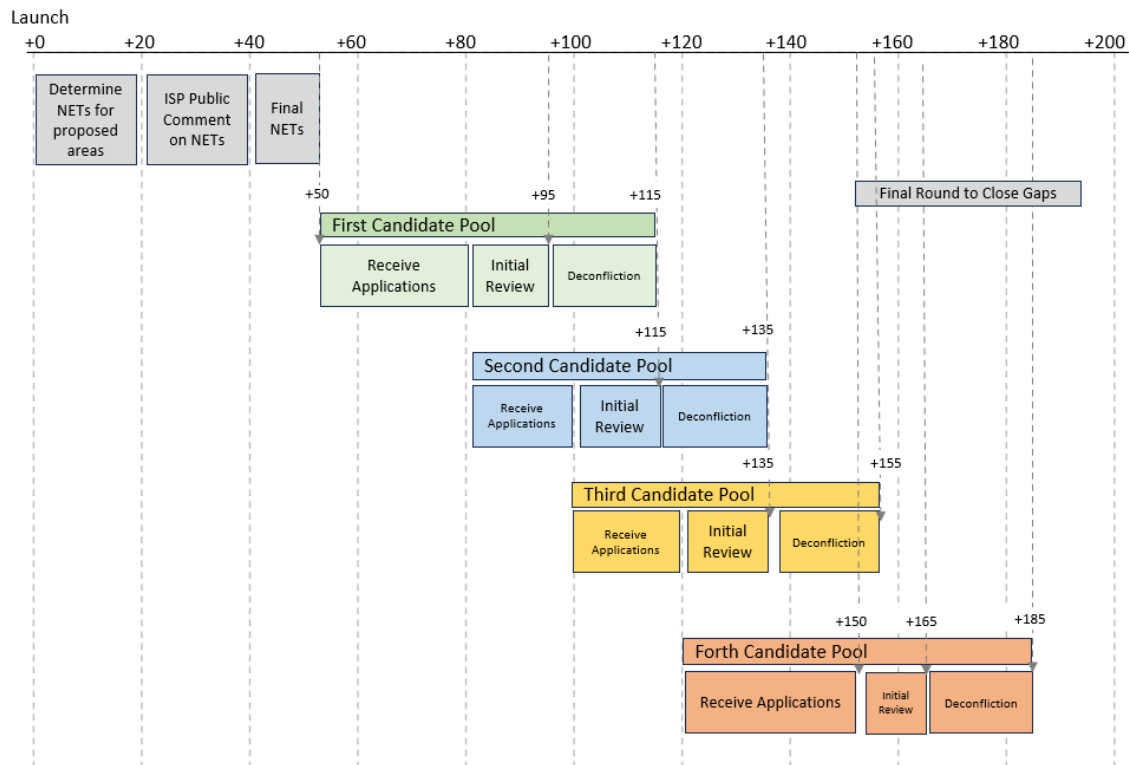
- 2.4.1 **Text Box:** Describe a detailed plan to award subgrants to last-mile broadband deployment projects through a fair, open, and competitive process.

The OBO will award grants through a multi-stage process in which a series of successive candidate pools. The graph below illustrates the overall timeline of the subgrantee selection process as it progresses through a series of candidate pools, working towards a statewide broadband coverage solution that prioritizes unserved over underserved locations and fiber over other technologies as the BEAD program requires. The process will involve eight steps:

1. Initial Geospatial Planning
2. Public Comment on Geospatial Planning
3. Decision on Geospatial Planning and Announcement of Recommended Network Expansion Territories (NETs)
4. First Candidate Pool Application Window, Review, Deconflicting and Award
5. Second Candidate Pool Application Window, Review, Deconflicting and Award (as needed)
6. Third Candidate Pool Application Window, Review, Deconflicting and Award (if funding permits)
7. Fourth Candidate Pool Application Window, Review, Deconflicting and Award (as needed and if funding permits)
8. Final Round to Close Gaps

The text below describes a process by which the OBO would allocate BEAD funds. The process is tentatively expected to last 185 days, each stage includes a specified time allotment. The timeline should be seen as preliminary, to be superseded by a definition of key deadlines around the time that subgrantee selection is launched. The actual subgrantee selection process, and the stages within it, may be allotted more or somewhat less time based on the timing of approval of Oklahoma's Volume I and Volume II, the volume of challenges received, and the time required to adjudicate them, and other factors. It may also be designed to work around major holidays.

Subgrantee Process Timeline



Initial Geospatial Planning (Timeline: Subgrantee Selection Process Launch to Launch + 20 days)

Begin: Launch of Subgrantee Selection Process (after Location List Finalized)

End: Launch + 20 days

An initial round of geospatial planning for the closure of Oklahoma’s broadband coverage gaps is planned to occur as soon as the post-challenge list of targeted unserved and underserved locations has been approved by the NTIA. The OBO’s geospatial analysts will generate contiguous territories, bounded by counties and other geographical features (e.g., roadways, rivers, rail lines, etc.), using a clustering technique for nearest unserved/underserved and unfunded BSLs which have a positive estimated NPV value. These contiguous territories will also contain nearby BSLs with a negative estimated NPV value that maintains an overall desirable, positive NPV for the entire cluster, so that every unserved/underserved and unfunded BSL is accounted for in a territory. These territories will generally consist of tens to hundreds of BSLs, but potentially in some cases as little as one BSLs. The output of the geospatial planning will be a list of recommended Network Expansion Territories (NETs).

Cost Estimation

Begin: Launch of Subgrantee Selection Process

End: Launch + 20 days

To accompany recommended NETs, the OBO will develop an initial estimate of the expected subsidy cost of getting each recommended NET served. These subsidy cost estimates will be calculated in a way that is consistent with the OBO success in meeting its goals of statewide universal broadband access. After BEAD subgrantee applications are received and are under review, applications whose subsidy requests greatly exceed the estimated subsidy needs of the areas targeted may receive heightened scrutiny of the allowability and reasonableness of their budgeted expenses.

Note that cost estimation is part of the initial geospatial planning and concurrent with it.

Initial Publication of and Public Comment on Initial Geospatial Planning

Begin: Launch + 20 days

End: Launch + 40 days

After the OBO has defined and determined a cost for the recommended NETs, it will publish the map of NETs to the OBO website. It will then request input from ISPs, starting with a public comment/roundtable style discussion about these geographical definitions, with particular interest in feedback about inapt definitions of NETs that impede cost-effective broadband deployment by grouping locations in unsuitable ways.

The OBO will consider requests to redefine NETs. In requesting revisions to NETs, the OBO will look for evidence that a particular grouping of BSLs into a NET is technically or competitively inefficient. For example, commenters might critique a NET definition by showing that it would be unnecessarily costly to serve the BSLs it contains through a single network rather than by extending multiple other, neighboring networks, or they might show that the NET definition was advantageous to one ISP but tends to exclude others. Typically, NETs that are not the subject of public comments will be left as is.

Integration of ISP Feedback and Publication of Recommended NETs (Planned for Launch + 40 days to Launch + 50 days)

Begin: Launch + 40 days

End: Launch + 50 days

When the OBO has developed the recommended NETs, adjusted as needed considering the public comment, and the accompanying subsidy cost estimates, these will be published on the OBO website. BEAD applicants are encouraged to structure their proposals around these recommended NETs to the extent that this is technically and commercially feasible.

Receiving Applications (Planned for Launch + 50 days to Launch + 140 days)

Begin: Launch + 50 days

End: Launch + 140 days

An application form will be published early in 2024, well in advance of the launch of the subgrantee selection process and will define the information that BEAD applicants will need to provide to the OBO to

be considered for a BEAD award. Information provided in the application will include the technology, pricing, subsidy request, budget, and proposed service area (consisting where possible of a set of NETs). The information in the applications should be sufficient to determine:

- Whether the match requirement is met.
- Whether the project, as a whole or some subset, qualifies for inclusion in each of the candidate pools defined below.
- What score the project should receive under the rubric.

In addition, the application reform may include a severability matrix which details an applicant's contingency planning if they qualify to win some parts of their proposed territory but not others.

Severability

When projects offer to serve multiple NETs, the applicants' willingness to accept awards for subsets of the NETs can be variable. Both network design considerations and shared fixed costs can make some subsets of the project area commercially infeasible to deploy to in a cost-effective and commercially sustainable way. But other subsets of the project area may comprise a workable project footprint. In its quest to achieve a universal broadband access solution with no overlapping projects, the OBO anticipates a need to make extensive use of all the flexibility that BEAD applicants can offer. Applicants will be expected to note which NETs could be severed from the application. This will allow the OBO flexibility to achieve the overall goal to determine how best the state may be served. The OBO plans to include in the application a severability matrix form by which applicants may communicate to OBO any flexibility that they may have to vary their proposed project areas.

Further guidance will be forthcoming, but ideally, severability matrices should indicate:

- All combinations of NETs that an ISP would be willing to accept a BEAD award for and commit to build to.
- The subsidy price that the applicant would require to serve any combination of NETs.

The OBO encourages BEAD applicants to invest in substantial contingency planning and use severability information in the application form to provide the OBO with the optionality that it needs to find a comprehensive statewide solution to Oklahoma's broadband coverage gaps. BEAD applicants should bear in mind that a well-designed severability matrix will be critical to success in winning BEAD funds. Some projects may immediately win all their proposed areas, but if not, indicating flexibility through a severability matrix will be critical to continued consideration.

If incoming BEAD applications provide sufficient optionality through the severability matrices they include, the OBO will plan to leverage these severability matrices to find a cost-effective statewide solution, as described below. If too few applicants take the opportunity to describe their flexibility, leaving the OBO with too little optionality to effectively pursue a statewide solution, the OBO may lean on direct outreach to ISPs to probe for a greater willingness to adapt to revisions of their proposed service areas than they indicated in their applications, either prior to or during the deconfliction process. The OBO desires to minimize the need for outreach to applicants during the deconfliction phase, which will tend to make timelines drag and/or demand unreasonably quick decisioning by applicants, so advance contingency planning through severability matrices is strongly encouraged.

Sequential Candidate Pools with Overlapping Application Windows

Given the brevity of the BEAD timeline and the scale of the OBO's task in finding solutions, the OBO will continue to accept some applications while reviewing and tentatively awarding others.

The BEAD NOFO requires states to prioritize (a) end-to-end fiber projects over other technologies, if they have subsidy costs per location below the Extremely High Cost Per Location Threshold (Threshold), and (b) unserved areas over underserved areas. Accordingly, the OBO distinguishes four pools of candidate projects that must be considered in due order of priority, namely:

- The ***First Candidate Pool*** will consist of (a) end-to-end fiber projects (b) whose proposed project footprints consist of at least 80% unserved locations and (c) are comprised of a set of recommended NETs that they fully serve, (d) whose subsidy costs per location are below the Threshold, and (e) that are received during a 30-day window for receiving first candidate pool applications.
- A ***Second Candidate Pool*** will consist of (a) all projects using reliable broadband technology, not already awarded, (b) whose project footprints consist of at least 80% unserved locations and (c) are comprised of a set of recommended NETs that they fully serve, (d) that are received during a 20-day window for receiving second candidate pool applications. The second candidate pool will include any end-to-end fiber projects from the first candidate pool, not yet funded, that serve unserved areas. All second candidate pool projects will be informed that they need to remove from their project footprints any locations that have already been included in tentatively awarded first candidate pool projects. Note that if all unserved locations get served by projects in the First Candidate Pool, there will be no Second Candidate Pool.
- A ***Third Candidate Pool*** will be created and considered for funding if BEAD funds are still available after the First and Second Candidate Pools have been considered and resolved into awards. It will consist of two categories of projects, insofar as they have been received before the end of a 20-day window for receiving Third Candidate Pool projects, on the condition that they are willing to remove from their project footprints any locations that already have a proposed solution from the first and second candidate pools. The two categories are:
 - a. all end-to-end fiber projects, not yet funded, whose subsidy costs are below the Threshold, and whose project footprints are comprised of a set of recommended NETs that they fully serve, as well as
 - b. all unserved area projects not yet funded.
- A ***Fourth Candidate Pool*** will be created if (a) there are still BEAD funds remaining, and (b) there are still BEAD eligible BSLs that do not have a solution, after the First, Second, and Third Candidate Pools have been considered and resolved into awards. It will consist of all remaining projects using reliable broadband technology proposing to serve BEAD eligible locations that are received before the end of a 20-day window for receiving fourth candidate pool applications, and which are willing to remove from their project footprints any locations that already have a proposed solution from the first, second, and third candidate pools.

These candidate pools will be considered for funding in order, with deadlines for inclusion in each candidate pool. Note that in the event of budget insufficiency, consideration of later candidate pools may be canceled. Specifically:

- To be considered as part of the First Candidate Pool, projects must be submitted within 30 days of the opening of the application window, or ***Launch + 80 days***.
- To be considered as part of the Second Candidate Pool, projects must be submitted within 50 days of

- the opening of the application window, or ***Launch + 100 days***.
- To be considered as part of the Third Candidate Pool, projects must be submitted within 70 days of the opening of the application window, or ***Launch + 120 days***.
- To be considered as part of the Fourth Candidate Pool, projects must be submitted within 90 days of the opening of the application window, or ***Launch + 150 days***.

The broadband office welcomes all projects that would help to close the digital divide in Oklahoma by deploying broadband infrastructure to BEAD eligible locations but encourages applicants to **structure their project footprints around the recommended NETs** to the extent possible, and to try to keep their subsidy requests within the cost projections for the areas proposed. Every application must include a variety of information required for gating and scoring the project, notably (a) a project footprint consisting of a list of the NETs that the project would deploy to, and (b) a subsidy request that defines the BEAD outlay requested by the applicant in return for the deployment commitments offered.

BEAD applications should represent good faith bids to serve proposed territories, and applicants whose applications are accepted and funded should be ready to build, *but* applicants will *not* be considered to have indicated a willingness to construct any sub-area of the proposed footprint, or to build for any subsidy less than the request. However, the broadband office strongly encourages applicants to be as flexible and communicative as they can, and the process will favor applicants that work collaboratively with the state towards a statewide universal broadband access solution based on non-overlapping, cost-effective, sustainable projects.

Reviewing, Scoring, and Awarding Proposed Projects

Application review will launch shortly after the launch of the subgrantee selection process and continue until all applications have been reviewed. Along the way, there are four key milestones:

- Definition of the First Candidate Pool: Within 15 days after First Candidate Pool submission deadline (***Launch + 95 days***)
- Definition of the Second Candidate Pool: Within 15 days after Second Candidate Pool submission deadline (***Launch + 115 days***)
- Definition of the Third Candidate Pool: Within 15 days after the Third Candidate Pool submission deadline (***Launch + 135 days***)
- Definition of the Fourth Candidate Pool: Within 15 days after the Fourth Candidate Pool submission deadline (***Launch + 165 days***)

At the time of each definition of a candidate pool, the broadband office will determine which projects qualify and notify them that they are being actively considered for funding and should be ready to entertain proposed revisions as needed. Within each candidate pool, the OBO will select winning projects on the basis of the rubric and seek the consent of applicants to revisions of their project footprints where needed by consulting the severability matrix. The OBO will then iteratively propose revisions to applicants as needed to deconflict the project areas. The timeline for completing the deconfliction for each candidate pool is as follows:

- Deconfliction and award for First Candidate Pool: Completed by ***Launch + 115 days***.
- Deconfliction and award for Second Candidate Pool: Completed by ***Launch + 135 days***.
- Deconfliction and award for Third Candidate Pool: Completed by ***Launch + 155 days***.
- Deconfliction and award for Fourth Candidate Pool: Completed by ***Launch + 185 days***.

The OBO will aim to complete the deconflicting and negotiations to arrive at award decisions within 20 days, culminating in 185 days.

The Deconfliction and Award Process

Within each of the Candidate Pools described above, the OBO can expect that some project footprints will overlap. In the special case where projects share the exact same proposed service area, a straightforward like-to-like comparison using the rubric can select the candidate project to award. But the OBO needs to situate this special case in a more general process that can address scenarios where proposed service areas *partially* overlap.

For this purpose, an iterative process will be implemented for each candidate pool in succession, whereby the OBO will first define an unresolved area consisting of all the NETs that projects in the candidate pool propose to serve, then assign areas to projects, primarily based on the rubric, tentatively award projects that win all their areas and remove them from the candidate pool and their territory from the unresolved area, check the severability matrices to keep the remaining projects that will accept the revisions needed to keep them in play, and assign areas to projects again, iterating until all the projects have either been selected for award, or have seen all their NETs awarded to other projects.

While this deconfliction process may potentially require many iterations, they can be performed quickly because they do not involve any fresh outreach to or decisioning by applicants, who will already have done their contingency planning and included it in their application. The process is entirely automatable.

After the First Candidate Pool, each subsequent Candidate Pool will need to be deconflicted vis-à-vis previous Candidate Pools before it goes through the process of internal deconfliction. Thus, when it is the Second Candidate Pool's turn to be considered, all projects will be checked against the awards to the First Candidate Pool awarded projects, and if their service areas overlap them, the severability matrices will be used to check whether the applicants have indicated a willingness to accept the revisions that would be needed to eliminate the overlaps. If so, revised versions of the project will be included in the Second Candidate Pool and considered for award. If not, the projects will be removed from further consideration.

Final Round to Close Gaps

After two to four candidate pools have been considered, depending on funding availability, a final round will be conducted, during which the OBO will seek solutions for any locations or groups of locations for which it has still received no proposals. For this purpose, the OBO may engage with existing providers and/or other prospective subgrantees to find providers willing to expand their existing or proposed service areas.

The scope of the final round will adjust to the required prioritizations of the BEAD program. If the OBO has achieved a solution for all unserved locations, the final round may focus on underserved locations. If there are still gaps in the coverage plans for unserved locations, those will be the focus.

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

The OBO developed a scoring rubric that rewards minimum BEAD outlay per location, best of class affordability plans, and long-term financial viability of proposed projects. The OBO's goal in developing the

grant application and scoring rubric is to not only award the most qualified subgrantee for each proposed project, but also to collect sufficient data from each applicant to fairly judge each proposed project on established metrics such as cost per location, cost per route mile of deployed network, and density of locations per route mile.

Below is the draft scoring rubric that will be utilized to score subgrantee applicants on their proposed projects.

Criteria	Category	Max. Points Available	Weight
Primary Broadband Projects			
	Min. BEAD Outlay/Location	60	37.5%
	Affordability	45	28.1%
	Fair Labor Practices	15	9.4%
Total Primary Score & Weight		120	75.0%
Secondary Criteria (Required for All Subgrantee Selection)			
	Speed to Deployment	8	5.0%
	Sustainability	10	6.3%
	Local and Tribal Coordination	6	3.8%
Secondary Criteria (Only Required for Selection Among Other Last-Mile Broadband Deployment Projects)			
	Speed & Latency	9	5.6%
	Low-Cost Option	7	4.4%
Total Secondary Score & Weight		40	25.0%
Total Score & Weight		160	100.0%

Primary Criteria

- **Minimum BEAD Outlay per Location**
 - *Description:* Eligible applicants should identify eligible costs and in-kind contributions (which must, absent a waiver, cover no less than 25% of the project cost) by category. Applicants should provide a thorough narrative describing their budget including leveraging existing broadband, a financial plan, additional costs, etc.
 - *Scoring:* (See range chart below) Determined by formula: $50 * (\$10,000 - \text{BEAD Program Outlay per Passing}) / \$10,000$. Note that in some cases the EHCPLT may limit the costs per location for inclusion in a candidate pool, so that all applicants in a candidate pool will get substantially positive scores here, reducing the range of variation, while in other cases high-cost projects may get negative scores. (Note that the number \$10,000 is an arbitrary scaling factor but ensures similar treatment across candidate pools in the way that cost-effectiveness affects selection decisions.)

Outlay Per Location (After Match)	Point Value
-----------------------------------	-------------

\$200	60
\$1,000	55
\$2,000	50
\$3,000	45
\$4,000	40
\$5,000	35
\$6,000	30
\$7,000	25
\$8,000	20
\$9,000	10
\$10,000	0
\$15,000	-25

- **Affordability**

- *Definition:* The prospective subgrantee’s commitment to provide the most affordable total monthly price to Eligible Subscribers as defined in the BEAD NOFO for 1Gbps symmetrical service (latency: <100 milliseconds) in the project area(s), inclusive of all taxes, fees, and charges with no additional non-recurring costs or fees to the consumer. Any proposed low-cost option shall not be subject to data caps, surcharges, or usage-based throttling. All subgrantees must participate in the ACP.
- *Scoring:* (See range chart below) Point value determined by total monthly price.

Total Monthly Price	Point Value
<\$30.00	45
\$30.01 - \$40.00	40
\$40.01 - \$50.00	35
\$50.01 - \$60.00	30
\$60.01 - \$70.00	25
\$70.01 - \$80.00	20
\$80.01 - \$90.00	10
\$90.01 - \$100.00	5
>\$100.01	0

- **Fair Labor Practices**

- *Description:* As explained in Section IV.C.1.e of the BEAD NOFO, eligible applicants must give priority to projects based on an applicant’s demonstrated record of and plans to be in compliance with federal labor and employment laws. New entrants without a record of labor and employment law compliance must be permitted to mitigate this fact by making specific, forward-looking commitments to strong labor and employment standards and protections with respect to BEAD-funded projects. Accordingly, the OBO will request documentation to demonstrate a record of compliance with federal labor and employment laws, and score it as shown below as part of the application process.
- *Scoring:* 0, 8 Points

- Applicant will use contractors and directly employed workforce = 0 Points
 - Applicant will construct network using exclusively directly employed workforce= 8 Points
- **Safety and Training Standards**
 - *Description:* Describe the safety and training standards in place for your employees, including professional certification, licensure, and/or robust in-house training opportunities
 - *Scoring:* 0, 7 Points
 - Did not provide adequate documentation on safety and training standards in place = 0 Points
 - Provided documentation on safety and training standards in place, including either (a) demonstrated relevant certification & licensure, (b) documented regular in-house training opportunities, or both = 7 Points

Secondary Criteria (Required for All Subgrantee Selection)

- **Speed to Deployment**
 - *Description:* All subgrantees that receive BEAD Program funds for network deployment must deploy the planned broadband network and begin providing services to each customer that desires broadband services within the project area not later than four years after the date on which the subgrantee receives the subgrant from the Eligible Entity. Eligible Entities must give secondary criterion prioritization weight to the prospective subgrantee's binding commitment to provide service by an earlier date certain, subject to contractual penalties to the Eligible Entity, with greater benefits awarded to applicants promising an earlier service provision date.
 - *Scoring:* 0, 3, 8 Points
 - Subgrantee does not provide binding commitment to provide service by an earlier date certain = 0 Points
 - Applicant provides binding commitment to provide service by a date earlier than three years from the date on which the subgrantee receives the subgrant from the Eligible Entity = 2 Points
 - Applicant provides binding commitment to provide service by a date earlier than two years from the date on which the subgrantee receives the subgrant from the Eligible Entity = 5 Points
 - Applicant provides binding commitment to provide service by a date earlier than one year from the date on which the subgrantee receives the subgrant from the Eligible Entity = 8 Points
- **Sustainability**
 - *Description:* Prospective subgrantees shall submit business plans and related analyses that substantiate the sustainability of the proposed project. This can be provided in the form of pro forma statements or analyses, inclusive of quarterly cash flow, balance sheet, and customer adoption rate projections and should include 7-10 years of operating cash flow projections post targeted completion of project depending on the useful life of equipment deployed throughout the project area.
 - *Scoring:* 0, 5, 10 Points

- Weak demonstration: Forecast figures not clear or not practical, i.e., very high adoption rate, or very high revenue per unit (RPU) = 0 Points
 - Moderate demonstration: (a) Quarterly cash flow and balance sheet proforma to include EBITDA and subscriber adoption rates for 5-10 years beyond targeted completion date, depending on the useful life of network equipment deployed throughout the project area. (b) Projected EBITDA is positive but less than 5% of total revenue in less than 10 years = 3 Points
 - Strong demonstration: (a) Quarterly cash flow and balance sheet proforma to include EBITDA and subscriber adoption rates for 5-10 years beyond targeted completion date, depending on the useful life of network equipment deployed throughout the project area. (b) Projected EBITDA is positive in a range of 5% - 10% of total revenue in less than 10 years. = 6 Points
 - Very Strong demonstration: (a) Quarterly cash flow and balance sheet proforma to include EBITDA and subscriber adoption rates for 5-10 years beyond targeted completion date, depending on the useful life of network equipment deployed throughout the project area. (b) Projected EBITDA is positive and greater than 10% of total revenue in less than 10 years. = 10 Points

- **Local and Tribal Coordination**
 - *Description:* NTIA encourages Eligible Entities to adopt selection criteria reflecting a prospective subgrantee's support from the local and/or Tribal Government with oversight over the location or locations to be served.
 - *Scoring:* 0, 6 Points
 - The applicant does not provide any letters of support from local or Tribal Government, or any submitted letters of support do not name the prospective subgrantee. = 0 Points
 - Applicant provides letter(s) of support for proposed project from local and/or Tribal government. Letters of support must mention the prospective subgrantee by name and at least some description of the project. (Note: A Tribal Resolution of Consent is required for all Tribal areas prior to any subgrantee awards). = 6 Points

Secondary Criteria (Only Required for Selection Among Other Last-Mile Broadband Deployment Projects)

- **Speeds & Latency**
 - *Description:* Eligible applicants must weigh the speeds, latency, and other technical capabilities of the technologies proposed by prospective subgrantees seeking to deploy projects that are not Priority Broadband Projects. Applications proposing to use technologies that exhibit greater ease of scalability with lower future investment and whose capital assets have longer useable lives should be afforded additional weight over those proposing technologies with higher costs to upgrade and shorter capital asset cycles.
 - *Scoring:* 0, 4, 9 Points
 - Applicant unable to provide 100/20 Mbps and/or latency below 100 milliseconds = 0 Points
 - Applicant able to provide 100/20 Mbps and latency below 100 milliseconds = 4 Point

- Applicant able to provide 1 Gbps symmetrical and latency below 100 milliseconds = 9 Points
 - **Low-Cost Service**
 - *Description:* Selection among other Last-Mile Broadband Deployment Projects, the prospective subgrantee’s commitment to provide the most affordable total monthly price to the customer for 100/20 Mbps service in the proposed project area(s)
 - *Scoring:* 0, 7 Points
 - Participates in ACP and offers to all eligible subscribers low-cost option for 100 Mbps/20 Mbps service for \$60 per month or less, inclusive of all taxes, fees, and charges if the subscriber does not reside on Tribal Lands, or \$75 per month or less, inclusive of all taxes, fees, and charges if the subscriber resides on Tribal Lands, with no additional non-recurring costs or fees to the consumer = 0 Points
 - Participates in ACP, offers low-cost option for 100 Mbps/20 Mbps service for \$60 per month or less, to ALL subscribers in the project areas = 7 Points

Each eligible applicant must complete an application that will require company information, relevant history, project narrative, a table of proposed passings by category and serviceability, and they must also address multiple gating factors either by narrative, or attachments, such as audited financial statements, letter of credit, and financial certification, among others. Applicants must also certify that all information is true, complete, and accurate.

2.4.2.1 Attachment: As a required attachment, submit the scoring rubric to be used in the subgrantee selection process for deployment projects. Eligible Entities may use the template provided by NTIA, or use their own format for the scoring rubric.

The OBO developed a scoring rubric that rewards minimum BEAD outlay per location, best of class affordability plans, and long-term financial viability of proposed projects. The OBO's goal in developing the grant application and scoring rubric is to not only award the most qualified subgrantee for each proposed project, but also to collect sufficient data from each applicant to fairly judge each proposed project on established metrics such as cost per location, cost per route mile of deployed network, and density of locations per route mile.

Below is the draft scoring rubric that will be utilized to score subgrantee applicants on their proposed projects.

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	Sustainability	10	6.3%
	Local and Tribal Coordination	6	3.8%
Secondary Criteria (Only Required for Selection Among Other Last-Mile Broadband Deployment Projects)			
	Speed & Latency	9	5.6%
	Low-Cost Option	7	4.4%
Total Secondary Score & Weight		40	25.0%
Total Score & Weight		160	100.0%

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

The prioritization of Unserved Service Projects, and with them unserved locations, over Underserved Service Projects, and with them underserved locations, will occur through the division of incoming BEAD applications into candidate pools based on their service territories and technology. Unserved area projects will be classified into the first and second candidate pools. The first two candidate pools will be considered and resolved into awards before the third and fourth candidate pools are considered. In this way, the OBO will make its best effort to award as many Unserved Service Projects as possible before it turns to Underserved Service Projects.

To further ensure that the built-in prioritization of the IJJA is respected and unserved locations' broadband coverage gaps are closed before underserved area projects begin to be funded, the final round to close gaps is expected to launch after the full consideration and resolution to award of the second, not the fourth, candidate pool. While the 365-day time from Initial to Final Proposal necessitates the OBO plan to consider underserved area projects concurrently with efforts to close any unserved area gaps after the second candidate pool, the OBO will make sure to keep its underserved area awards tentative until the unserved area broadband coverage gap has been fully addressed, so that it will not fail to achieve universal 25/3 broadband coverage because of funds spent on underserved area projects.

Underserved area project awards will not be conditional on the actual construction of BEAD-funded broadband networks sufficient to serve all unserved locations. Rather, the BDO will consider the unserved area coverage gap to be addressed when commitments to deploy have been secured from qualified ISPs.

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

Not applicable.

2.4.5 **Text Box:** The proposed subgrantee selection process is expected to demonstrate to subgrantees how to comply with all applicable Environmental and Historic Preservation

(EHP) and Build America, Buy America Act (BABA) requirements for their respective project or projects. Describe how the Eligible Entity will communicate EHP and BABA requirements to prospective subgrantees, and how EHP and BABA requirements will be incorporated into the subgrantee selection process.

First, eligible applicants will include among their “gating” eligibility requirements affirmative certifications of compliance with all BEAD program requirements, including EHP and BABA. Those eligible applicants neglecting to certify this compliance as a part of their subgrantee application proposal will be disqualified from further consideration in Round 1 but may reapply in subsequent rounds (if needed) if they then make this certification.

Second, the subgrantee awardees will contract with the state to receive their awards. This subgrantee contract will contain these EHP, BABA, and all other BEAD program requirements and certifications for funding.

The OBO maintains an ongoing dialogue with industry through roundtable discussions, surveys, website postings, and email communications. Through these outreach mechanisms, the OBO will communicate EHP and BABA requirements to all applicants prior to the application process.

Specific to BABA, the OBO will highlight the following key points:

- Requirement that all iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted.
- In determining whether a product is produced in America, subrecipients must comply with definitions included in Section 70912 of the Build America, Buy America Act, which provides that a manufactured product is considered produced in the United States if the manufactured product was manufactured in the United States and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product, unless another standard for determining the minimum amount of domestic content of the manufactured product has been established under applicable law or regulation.
- In addition to the provisions above, subgrantees may not use BEAD funding to purchase or support any covered communications equipment or service, as defined in Section 9 of the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. § 1608).
- The IIJA prohibits subgrantees from using BEAD funding to purchase or support fiber optic cable and optical transmission equipment manufactured in the People’s Republic of China unless a waiver of this requirement is received from the Assistant Secretary.

Projects that fail to comply with EHP and/or BABA requirements will not be considered as a potential subgrantee of BEAD funding.

Last-Mile Broadband Deployment Project Areas

2.4.6 **Text Box:** Describe how the Eligible Entity will define project areas from which they will

solicit proposals from prospective subgrantees. If prospective subgrantees will be given the option to define alternative proposed project areas, describe the mechanism for deconflicting overlapping proposals to allow for like-to-like comparisons of competing proposals.

As described in 2.4.1, the OBO will make an initial definition of Network Expansion Territories (NETs) to serve as the basis for defining project areas and designing severability matrices to help with deconfliction. The OBO expects in many cases ISPs' project areas will overlap in complex ways, and a robust deconfliction process will be required to sort out the winners so that every NET will have one solution, no NET will have more than one, and all overlaps will be eliminated. To make this solution work, the OBO will need industry to conduct pro-active contingency planning so as to provide options the OBO can use to reconcile project footprints and find a statewide solution. The details of deconfliction are shown in 2.4.1. Like-to-like comparison of project areas will be conducted based on the rubric, and the highest-scoring project will win where project service areas overlap perfectly, but variances from this are possible in the course of deconfliction, as the OBO seeks to maximize not only the project traits measured in the rubric score, but also the geographic reach of reliable broadband technology solutions.

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

As described in 2.4.1, a Final Round to close gaps is planned for the later stages of the subgrantee selection process, to deal with the case where no applications are received for one or more NETs. Given the likelihood that Oklahoma's BEAD allocation will prove insufficient to fund deployment to all the underserved areas, the Final Round is principally expected to come into play for any remaining unserved locations after the first and second candidate pools have been resolved to award. The methods employed at this stage must be proactive, specific to places and ISPs, and dependent on awards already tentatively made, and therefore cannot be detailed in advance, but the OBO reminds all applicants that all awards are tentative until a statewide solution has been achieved, and that all awards for underserved areas, in particular, are dependent on the achievement of a full solution for unserved locations, so it encourages ISPs to be accommodating and work with the OBO to make coverage universal, at speeds of at least 25/3, and if possible, 100/20.

Crucial to the OBO's strategy for addressing locations where initially no proposals are received is to keep the application window open for new projects as multiple rounds of awards are announced. While the tentative day counts will be resolved into specific deadlines at a later stage, it should be noted that the OBO's plan to accept applications for a fourth candidate pool as late as "Launch + 150 days," implies that the first and second candidate pools will have been fully deconflicted and resolved into awards, and the third candidate pool will have been defined, before the application window closes for consideration as part of the fourth candidate pool. ISPs will therefore have a substantial window of opportunity to see where proposals either are lacking or else have been eliminated during deconfliction, and then to propose new projects that meet residual needs.

In this connection, the OBO would encourage applicants to bear in mind that while it will leverage competition to limit the BEAD program outlay required for competitive areas, projects in areas that are

lacking in other options may qualify for larger capex subsidies, on a per location basis, to maximize the reach of the statewide BEAD solution.

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

The digital divide is particularly acute in Tribal Nations. The OBO welcomes eligible applicants that cover tribal locations be they residential, business, and/or CAIs. As all federally recognized tribal nations in Oklahoma are considered sovereign nations, they each have sovereign immunity, meaning they have absolute immunity from suit, in government operations as well as commercial transactions, which applies even to contracts and business activities off the reservation. Therefore, it is important to ensure any eligible applicant must have explicit tribal government support for any prospective subgrantee that provides network deployment to any tribal nation location.

In that regard, the OBO will require written support or consent from the Tribal Government with oversight of the locations to be served. The OBO developed a scoring rubric that rewards subgrantees for securing the appropriate consent.

In the event any subgrantee award proposes to serve locations on Tribal Lands, the OBO will work closely with the subgrantee and the Tribal Government(s) to secure a Tribal Government Resolution of Consent that will accompany the Final Proposal.

Extremely High Cost Per Location Threshold

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

The BEAD program is required to pursue universal 100/20 broadband access while prioritizing fiber to the extent possible within the framework of that overriding objective. The Extremely High Cost Per Location Threshold (EHCPLT or Threshold) is the policy dial by which the OBO can manage the degree of fiber prioritization in the program so it can deploy as much fiber as possible while still achieving some kind of 100/20 broadband coverage for all the unserved locations and, if funds permit, all the underserved locations. The appropriate way to set the Threshold depends on the underlying cost of broadband deployment using fiber and other technologies. At a time of heightened uncertainty about broadband deployment costs, it is inadvisable to decide of the Threshold in this document. Instead, as permitted in the BEAD NOFO, this document declares a process by which the Threshold will be set in due course.

A Data-Driven Approach to Setting the Extremely High Cost Per Location Threshold

The OBO hereby lays out a process by which the Threshold can, should, and will be set, for a given set of underlying data about the estimated costs of broadband deployment. The assumed data structure for cost estimations is based on files produced by CostQuest Associates (CQA) and shared with the OBO through the NTIA. The CQA data is location-based, with a record for every broadband serviceable location (BSL), and

contains the following fields:

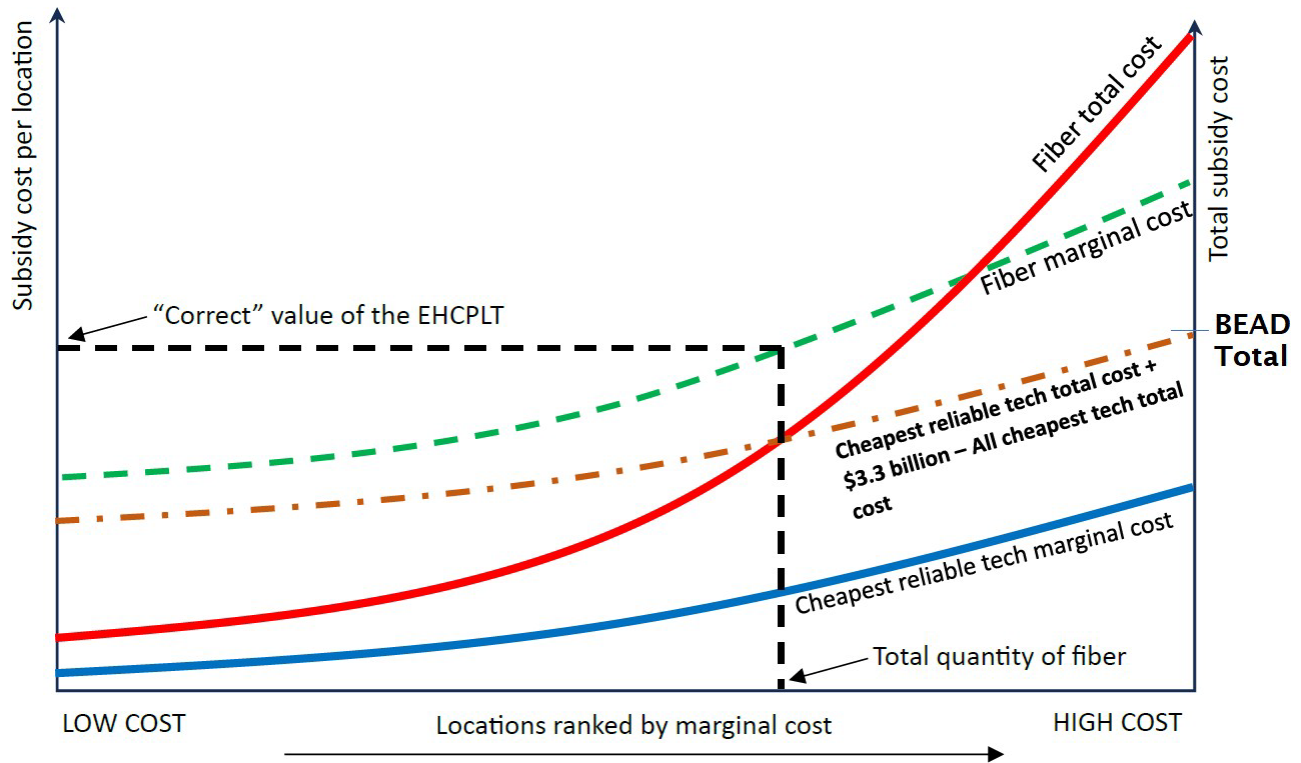
Location ID
FTTH [Fiber-to-the-home] Total Investment, Greenfield
FTTH NPV [Net Present Value], Greenfield
FW [Fixed Wireless] Total Investment, Greenfield
FW NPV, Greenfield

While the granularity of the CQA cost estimation data is valuable, there are many reasons for uncertainty about whether the CQA accurately represents the cost structures ISPs in Oklahoma will face when they plan their projects. One factor is the time lag; the actual construction of BEAD-funded broadband networks will occur well after the release date of the CQA data. The BEAD program also imposes special constraints on how network construction will need to occur, including BABA and special labor rules.

Broadband deployment supply chains have also experienced price rises in recent years, which may accelerate as BEAD funds start to flow nationwide and heighten demand for all sorts of network components. It is therefore critical that the process for setting the Threshold be open to new data about cost, especially the cost data contained in the incoming BEAD applications that will be received in 2024. It is the intent of the OBO to adjust the CQA data by a statewide factor that reflects deployment costs and subsidy requirements as revealed through the BEAD applications, as explained below. The data structure of the CQA data will, however, be maintained.

With that in mind, the OBO's approach to setting the Threshold, which is represented graphically below starts with ranking all the locations from least cost to highest cost of fiber deployment. The OBO will then calculate the cumulative total cost curve to deploy fiber to any given number of locations. A similar cumulative total cost curve will be calculated for the cheapest reliable technology, which, in the CQA data, will sometimes be fiber but sometimes fixed wireless. Based on the cheapest reliable technology cumulative total cost curve, the OBO will estimate, for any given number of locations, how much it can afford to pay for fiber deployment to that many locations and still have enough funds left over to close the rest of the statewide broadband coverage gap using the cheapest reliable technology. Based on this, the OBO will project the maximum amount of prioritized fiber that the state can afford. Finally, the OBO will identify the estimated margin cost per location of deploying fiber that corresponds to that amount of prioritized fiber deployment.

Process for Determining the Extremely High Cost Per Location Threshold



Conceptually, (a) the fiber marginal cost, (b) the cheapest reliable technology marginal cost, (c) the fiber cumulative total cost, (d) the cheapest reliable technology cumulative total cost, (e) the maximum affordable fiber spend per location while covering the remaining coverage gap using the cheapest reliable technology, (f) the total quantity of prioritized fiber deployment that the OBO projects, and (g) the derived value at which to set the Threshold.

This methodology for setting the Threshold has been run using the cost estimation data provided by CQA, and yielded a preliminary determination of \$30,000 per location for the Threshold.

Adjusting the Cost Estimation Data to Reflect Revealed Costs of BEAD Deployment

The determination of the Threshold that will be used for subgrantee selection will occur after the first candidate pool application window closes, using fiber projects for unserved areas to calculate the adjustment that will be required. Tentatively, at that time, the OBO will identify the list of unserved locations for which fiber projects have been proposed. For those locations, it will calculate:

The sum of the CQA estimated fiber deployment costs for those locations. (Pre-Estimated Cost)

The sum of the subsidy requests for proposed fiber deployment solutions for those locations, deduplicating appropriately where multiple fiber solutions are proposed. (Revealed Cost)

An Adjustment Factor equal to Revealed Cost / Pre-Estimated Cost.

The Adjustment Factor will then be applied to the location-level CQA cost estimation data, with each location's cost estimations being multiplied by the Adjustment Factor.

For example, if the proposed cost to deploy fiber to the unserved locations that get fiber proposals was estimated by CQA at \$100 million but is revealed in the actual BEAD applications to be \$200 million in required subsidies, then the OBO would multiply all the estimated fiber costs by 2 ($=\$200 \text{ million}/\100 million) before executing the Threshold determination process described above.

The OBO will continue to study options for imputing location-based deployment costs by technology to power a Threshold determination process that is as accurate as possible. But whatever approach is used, the OBO will assume that the cost estimation data will need to be validated against incoming BEAD applications before it will warrant sufficient confidence to be ready for use to set the Threshold.

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

- a. The process for declining a subgrantee proposal that exceeds the threshold where an alternative technology is less expensive.

End-to-end fiber projects are entitled to prioritization over other reliable technology projects if they have subsidy cost per location below the Threshold, but they lose this benefit if they exceed it. If they have unserved area footprints, exceeding the Threshold results in end-to-end fiber projects being excluded from the first candidate pool and considered as part of the second candidate pool. If they have underserved area project footprints, exceeding the Threshold relegates them from the third to the fourth candidate pool.

After it determines the Threshold, the OBO may give applicants proposing end-to-end fiber projects an opportunity to revise their severability matrices so that their subsidy requests in connection with potential revisions to their project footprints will not result in their losing the advantages of being a Priority Broadband Project. In this case, an applicant whose subsidy request would disqualify them from consideration as a Priority Broadband Project under some revision contingencies would be able to reduce its subsidy request for some or all revisions, such that it would continue to enjoy the benefits of the BEAD program's fiber prioritization. If this option is utilized, a further explanation of how it works will be provided at a suitable time.

It is still possible for a subgrantee proposal that exceeds the Threshold to win out over cheaper alternative technology projects based on the rubric. Such projects will, however, need to overcome a substantial disadvantage arising from the way Minimal BEAD Program Outlay feeds into the rubric score.

- b. The plan for engaging subgrantees to revise their proposals and ensure locations do not require a subsidy.

If applicants do not win all the locations that they included in their projects, the OBO will contact them with a counteroffer concerning which locations it would like them to consider serving instead. Applicants can then respond with (a) no, or (b) yes, with a new subsidy request in connection with the new project

footprint. Applicants who are asked to revise their footprints and decline will typically not get further consideration within the candidate pool but will be included in the next one.

The OBO's plans to engage with subgrantees to revise their proposal arise from the need to deconflict project footprints, and not from the need to ensure commercial sustainability. The assessment of commercial sustainability is part of the gating and scoring criteria. However, the OBO will seek to ensure that its revisions to project footprints do not lead to their ceasing to be commercially sustainable. The principal means of doing this is to secure the consent of applicants to any revisions of their project footprints.

- c. The process for selecting a proposal that involves a less costly technology and may not meet the definition of Reliable Broadband.

After the first, second, third, and fourth candidate pools have been fully considered and resolved into awards as the BEAD budgets and the applicants' flexibility permits, the OBO will launch a final round of grantmaking on an ad hoc basis, seeking solutions for any remaining unserved, or if applicable underserved, locations. At this stage only, the OBO may resort to funding non-"reliable" broadband technology projects for locations that do not seem to be able to get any broadband solution in any other way.

Deployment Subgrantee Qualifications

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

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are qualified to meet the obligations associated with a Project, that prospective subgrantees will have available funds for all project costs that exceed the amount of the grant, and that prospective subgrantees will comply with all Program requirements, including service milestones. To the extent the Eligible Entity disburses funding to subgrantees only upon completion of the associated tasks, the Eligible Entity will require each prospective subgrantee to certify that it has and will continue to have sufficient financial resources to cover its eligible costs for the Project until such time as the Eligible Entity authorizes additional disbursements.

The OBO anticipates significant response from the eligible applicant community in the way of proposals, from which it will need to prioritize a statewide solution to address connectivity to all unserved locations. This will include vetting eligible applicants during the application and subgrantee selection process through a series of gating and scoring criteria. Eligible applicants will be obligated to provide multiple certifications and compliance statements to demonstrate financial, technical, and managerial qualifications and resources to meet all obligations associated with a proposed project. Audited financial statements, an irrevocable letter of credit of at least 25% of the subaward amount, and proforma business plans demonstrating project sustainability together should provide clear evidence of financial capability long after construction completion.

- b. Detail how the Eligible Entity plans to establish a model letter of credit substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF).

The OBO will adopt the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF) as the template for all subgrantee applicants.

- c. Detail how the Eligible Entity will require prospective subgrantees to submit audited financial statements.

The OBO will require each eligible applicant to submit their prior fiscal year financial statements audited by an independent certified public accountant. There is an expectation that some applicants may not have audited financial records that meet the grant criteria. In such cases, the applicant must submit unaudited financial statements from the prior fiscal year and certify that it will provide financial statements from the prior fiscal year that are audited by an independent certified public accountant by a deadline to be specified in the coming months.

- d. Detail how the Eligible Entity will require prospective subgrantees to submit business plans and related analyses that substantiate the sustainability of the proposed project.

The financial viability of many proposed projects will depend on a potential subgrantee's ability to contain engineering, equipment, construction, and on-going operational costs, plus successfully market broadband services to all BSLs passed. The OBO will require quarterly cash flow and balance sheet projections, subscriber adoption rates, supported by narrative and analysis that extend at least 7-10 years beyond network deployment.

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

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

- a. Detail how the Eligible Entity will require prospective subgrantees to submit resumes for key management personnel.

The OBO has designed the application process and scoring rubric requiring key personnel resumes, professional certifications, and company organization charts. Each eligible applicant must also provide narrative on experience in similar projects, project readiness, and any upcoming organizational changes, including mergers and acquisitions. Further, the OBO requires applicants to disclose the number of network

infrastructure projects the applicant has completed both within and outside of Oklahoma, total number of addresses served, and number of years in business.

- b. Detail how it will require prospective subgrantees to provide a narrative describing their readiness to manage their proposed project and ongoing services provided.

Ideally, each eligible applicant would provide a complete engineering and design plan signed by a licensed engineer, have financing secured, all permitting secured, and present a solid quarterly project schedule illustrating all project activities through BSL adoption and installation. However, given the immense expense of in-field engineering and permitting, the OBO believes most eligible applicants will submit desktop engineering and analysis providing an “approximation” of costs to be incurred. Such a scenario unfolds because the subgrantee selection process can take up to a year before an eligible applicant may become a subgrantee and many unknowns can occur in that span of time. Availability and cost of equipment and labor may look significantly different a year out and subgrantees will need to adjust accordingly. As such, the OBO’s scoring rubric incentivizes applicants that demonstrate the highest level of readiness in their application submittals.

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

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

As discussed in Section 2.4.12.b, the OBO will require all eligible applicants to submit resumes of key personnel to include professional certifications. The OBO will also require submission of current and past broadband deployment activities within the state of Oklahoma, as well as all activities outside of Oklahoma. Further, each eligible applicant is required to certify timely submission of Form 477 data, the Broadband DATA Act, and serviceability data submission to the state’s broadband mapping program.

The application process will require each eligible applicant to demonstrate a record of or plans to be in compliance with federal labor and employment laws. Eligible applicants without a record of labor and employment law compliance can mitigate this fact by making specific, forward-looking commitments to strong labor and employment standards with respect to BEAD-funded projects. Further, all eligible applicants shall define safety and training standards, and enforceable commitments to fair workforce development and/or job quality objectives. Additionally, each eligible applicant will disclose and certify any violations of labor or employment laws for the previous 10 years as well as any litigation and penalties history.

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

network design, diagram, project costs, build-out timeline and milestones for project implementation, and a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project.

As previously discussed in Section 2.4.11b, the OBO's subgrantee application process requires all eligible applicants to submit professional engineer certified network designs, a quarterly project schedule that extends at least three years beyond construction completion, and financial proformas that demonstrate financial viability and project sustainability. Each of these sub-categories are reviewed and graded within the scoring rubric with the highest awards going to those applicants that present the most compelling business models for project deployment.

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

- a. Detail how the Eligible Entity will require prospective subgrantees to demonstrate that they are capable of carrying out funded activities in a competent manner in compliance with all applicable federal, state, territorial, and local laws.

The OBO will require each eligible applicant to disclose and certify compliance with numerous applicable federal, state, territorial, and local laws within the subgrantee application.

- b. Detail how the Eligible Entity will require prospective subgrantees to permit workers to create worker-led health and safety committees that management will meet with upon reasonable request.

Improving workplace safety and health leads to fewer accidents, lower injury and illness rates, and lower workers' compensation costs.

Within the grant application, applicants must submit their plan for permitting workers to create and implement worker-led health and safety committees with whom management will meet upon reasonable request.

The Oklahoma Department of Labor offers a consultation service program that provides free and confidential consultative workplace safety and health services. Prospective subgrantees can seek expert consultation services to help them establish a worker-led health and safety committee that meets the BEAD requirements.

Any application not meeting the minimum requirements of compliance as described on Page 74 of the BEAD NOFO will not be considered as a prospective subgrantee.

2.4.15 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee

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

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they possess the operational capability to qualify to complete and operate the Project.

The subgrantee selection process must ensure only capable entities are awarded funding for the deployment and long-term operation of proposed projects. The OBO has designed a rigorous application, scoring, deduplication, negotiation, and review process that will vet and reinforce the best awardee for each project area. The OBO has designed the application process and scoring rubric that requires key personnel resumes, professional certifications, and company organization charts. Each eligible applicant must also provide narrative on experience in similar projects, project readiness, and any upcoming organizational changes, including mergers and acquisitions. Further, the OBO will require eligible applicants to disclose the number of network infrastructure projects the applicant has completed both within and outside of Oklahoma, total number of addresses served, and number of years in business.

- b. Detail how the Eligible Entity will require prospective subgrantees to submit a certification that they have provided a voice, broadband, and/or electric transmission or distribution service for at least two (2) consecutive years prior to the date of their application submission or that they are a wholly owned subsidiary of such an entity and attest to and specify the number of years the prospective subgrantee or its parent company has been operating.

The OBO will require submission of current and past broadband deployment activities within the state of Oklahoma, as well as all activities outside of Oklahoma. Further, each eligible applicant is required to certify timely submission of Form 477 data, the Broadband DATA Act, and serviceability data submission to the state's broadband mapping program. With respect to ownership, the OBO will follow the Code of Federal Regulations to obtain prospective subgrantee ownership information as set forth in 47 C.F.R. § 1.2112(a)(1)-(7). Each eligible applicant will be required to certify that all information submitted to be true, complete, and accurate.

- c. Detail how the Eligible Entity will require prospective subgrantees that have provided a voice and/or broadband service, to certify that it has timely filed Commission Form 477s and the Broadband DATA Act submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations.

Each eligible applicant is required to certify timely submission of Form 477 data, the Broadband DATA Act, and serviceability data submission to the state's broadband mapping program.

- d. Detail how the Eligible Entity will require prospective subgrantees that have operated only an electric transmission or distribution service, to submit qualified operating or financial reports, that it has filed with the relevant financial institution

for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.

Eligible applicants that have operated only an electric transmission or distribution service and may have no broadband experience will be allowed to submit qualified operating or financial reports that that are typically filed with a relevant financial institution as long as such statements adhere to general accounting principles. Further, the OBO will require all eligible applicants to provide material assurances of sufficient financial, operational, and technical capabilities. Each eligible applicant must submit all required documentation, certifications, and relevant narrative to be considered in the subgrantee selection process. Any missing documentation will negate eligibility to be a subgrantee.

- e. In reference to new entrants to the broadband market, detail how the Eligible Entity will require prospective subgrantees to provide evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities.

As detailed in responses above, the OBO will require any new entrants to the broadband market that may have an interest in becoming a subgrantee to provide material assurances of sufficient financial, operational, and technical capabilities. New entrants must submit all required documentation and relevant narrative to be considered in the subgrantee selection process. Any missing documentation will negate eligibility to be a subgrantee.

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

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

The OBO will follow the Code of Federal Regulations to obtain prospective subgrantee ownership information as set forth in 47 C.F.R. § 1.2112(a)(1)-(7). Each eligible applicant will be required to certify that all information submitted to be true, complete, and accurate.

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

- a. Detail how it will require prospective subgrantees to disclose for itself and for its affiliates, any application the subgrantee or its affiliates have submitted or plan to submit, and every broadband deployment project that the subgrantee or its

affiliates are undertaking or have committed to undertake at the time of the application using public funds.

The OBO application process will require each eligible applicant to disclose and certify each broadband deployment project undertaken or submitted to undertake using public funds.

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

In addition to the broadband deployment projects undertaken via public funds, the OBO application process will require each eligible applicant to disclose and certify each broadband deployment project undertaken in Oklahoma over the past five years. For each broadband project, both publicly and privately funded, eligible applicants must provide the following information where applicable: (a) funding source, award amount, and matching commitment, (b) narrative on nature and impact of the project to include number of unserved, underserved, and CAIs, (d) technology deployed, (e) maximum upload/download speed and latency of deployed network, (f) cost of service to residents, (g) description of low-cost options for residents, (h) project start and end dates, and subscriber adoption rate.

2.5 Non-Deployment Subgrantee Selection (Requirement 9)

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

The OBO will make no subgrants for non-deployment activities.

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

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

N/A

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

N/A

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

N/A

2.6 Eligible Entity Implementation Activities (Requirement 10)

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

The OBO will not implement any initiatives as the recipient without making a subgrant.

2.7 Labor Standards and Protection (Requirement 11)

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

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

safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment project

The OBO is committed to ensuring appropriate labor and protection standards for all subgrantees where required by the BEAD NOFO and consistent with Oklahoma State Law. During the grant submission process, eligible subgrantees will be required to provide information in their applications to demonstrate their compliance with federal labor and employment laws.

Eligible subgrantees will be required to submit their record of past compliance with federal and employment laws including the following information:

- Subgrantee’s organizational compliance with federal labor and employment laws on broadband deployment projects in the last three years;
- Certification from an Officer/Director-level employee (or equivalent) of the eligible subgrantee evidencing consistent past compliance with federal labor and employment laws by the subgrantee, as well as all contractors and subcontractors; and
- Written confirmation that the eligible subgrantee discloses any instances in which it or its contractors or subcontractors have been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.

Eligible subgrantees will also be required to submit plans for ensuring compliance with federal labor and employment laws, which must address the following:

- How the prospective subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:
 - Information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network; and
 - How the subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

Furthermore, as noted in section 2.4, through the subgrantee award process eligible subgrantees will be asked to confirm that the subgrantee will permit workers to create worker-led health and safety committees without interference and have no intent to interfere with such a committee. In the event such committees are formed and raise valid concerns, the subgrantee leadership would agree to meet with the committee to discuss concerns.

The OBO will ensure that eligible subgrantees are aware of these requirements prior to and throughout the grant selection process by posting information on its website and through informational sessions with eligible subgrantees. The subgrantee application and scoring rubric reflect the worker requirements.

2.7.2 Text Box: Describe in detail whether the Eligible Entity will make mandatory for all subgrantees (including contractors and subcontractors) any of the following and, if required, how it will incorporate them into binding legal commitments in the subgrants it makes:

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

As a Right to Work state, the OBO will not require the eligible subgrantees to follow federal labor practices except where consistent with Oklahoma State Law or required by the BEAD NOFO. These practices include the following:

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

The OBO will require eligible subgrantees to address these items in their applications as directed by the BEAD NOFO and the Oklahoma Initial Proposal. These items will not be included in legally binding commitments but instead utilized as criteria in the selection process. This approach will ensure the subgrantee selection process is consistent with the BEAD NOFO and Oklahoma State Law.

2.8 Workforce Readiness (Requirement 12)

- 2.8.1 **Text Box:** Describe how the Eligible Entity and their subgrantees will advance equitable workforce development and job quality objectives to develop a skilled, diverse workforce.

At a minimum, this response must clearly provide each of the following, as outlined on page 59 of the BEAD NOFO:

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

The OBO will ensure that the state of Oklahoma and subgrantees will advance equitable workforce and job quality objectives to create a skilled, diverse workforce. The focus of workforce-related efforts by the OBO is to identify and work with relevant partners to ensure four primary components are implemented across the state.

1. Support subgrantees in creating and using a highly skilled workforce capable of carrying out required work in a safe and effective manner.

Oklahoma faces a workforce shortage across the state, including within the broadband sector. While not unique in its staggering workforce challenges, Oklahoma created a statewide task force to solve the problem. The Oklahoma Workforce Transformation Task Force was charged with identifying ways to align funding to goals, economic needs, and workforce gap.

In April 2023, the Task Force shared its results with the state of Oklahoma and Governor Kevin Stitt. The Task Force's results noted that:

... without significant realignment of coordination and collaboration of stakeholders involved; we will fall further behind. The Task Force hopes that this report will serve as a clarion call to state leaders. Oklahoma can close its current labor shortages and develop its talent pipeline for the jobs of the future. Oklahoma can become the first state in the country to properly coordinate and execute a cohesive workforce development strategy that simultaneously serves the individual needs of its citizens and the needs of the broader economy.

The Task Force report is available on [Oklahoma.gov](https://oklahoma.gov)¹

Based on the recommendations of the Task Force and passage of the Workforce Transformation Act (SB 621), Oklahoma Governor Kevin Stitt signed into law the Workforce Transformation Act², on June 14, 2023, creating the Oklahoma Workforce Commission. Led by private sector business leaders, the commission will help direct the state's workforce development strategy and initiatives.

Other statewide workforce initiatives are advancing upskilling and credentialing programs in in-demand job areas to address workforce needs. The Launch Oklahoma initiative has set ambitious goals to have 70% of the state's workforce (25-64 years old) have education or training beyond high school by the year 2025. Two of the main objectives of the initiative are (1) integrating and using workforce and economic development data to inform policy, track progress, and measure success; and (2) building partnerships between local industry and education at the regional level. These objectives are aligned with building sector-based partnerships and building a highly skilled workforce. Ongoing collaboration and partnership between industry, education, and state systems will support workforce needs.

- 2. Develop and promote sector-based partnerships among employers, education and training providers, the public workforce system, worker organizations, and community-based organizations that provide relevant training and wrap-around services to support workers to access and complete training, to attract, train, retrain, or transition to meet local workforce needs and increase high-quality job opportunities.*

The OBO has identified sector-based partnerships in the state and will continue to support and partner with these initiatives aligned with broadband deployment workforce needs. The Oklahoma State University Institute of Technology (OSU-IT) in Okmulgee received \$365,068 in State and Local Fiscal Recovery Funding to conduct a workforce training program specifically on fiber technology, including splicing and pole work. Additionally, OSU-IT received over \$750,000 from the NTIA to conduct a separate broadband workforce training program. The OBO is working closely with OUS-IT to ensure that tech program trainees have access to state resources post-graduation.

This program is vital to contributing to the broadband workforce and initially planned to directly impact 120 individuals (10 cohorts, 12 students per cohort) who are seeking opportunities for increased economic advancement but could grow based on interest. The OSU-IT fiber program includes seven stackable credentials:

- Fiber Optic Fundamentals:** This course addresses fiber optic fundamentals and combines classroom theory with hands-on skills training to provide a basic understanding of fiber optics technology and light theory. Students will be introduced to residential and commercial fiber splicing and learn to splice fiber using mechanical and fusion splicing techniques.
- Fiber Optic Outside Plant:** This class features classroom theory that delivers a quick refresher of fiber terminology and technology before diving into FTTX, OSP, fiber characterization, network troubleshooting, emergency restoration, and how the latest industry trends may impact field practices. This is followed by hands-on skills training, where students build and troubleshoot a passive optical network from patch panel to patch

¹ <https://oklahoma.gov/content/dam/ok/en/governor/documents/WorkforceTransformationReport-Final.pdf>

² <https://oklahoma.gov/governor/newsroom/newsroom/2023/june2023/governor-stitt-celebrates-oklahoma-s-workforce-transformation-wi.html>

panel through various splice closures with multiple drops.

3. **Fiber Optic FTTX Installer & Technician:** This course begins with a review of fundamental fiber component information related to fiber-to-the-home consideration. The course covers best practices for product selection and ideal placement of point-to-point, decentralized, and centralized split return options. This course will provide technical knowledge and the skills needed to install and test the physical layer for active Ethernet and passive optical networks (PON). Students will gain practical knowledge and hands-on skills in all aspects of FTTX deployments, including specific issues such as testing, splitters, wave division multiplex devices (WDM), measuring reflectance, and bi-directional testing unique to FTTX networks.
4. **Fiber Optic OTDR & Emergency Restoration:** Week 1 – focuses on field testing and troubleshooting fiber optic spans/links and explains the various types of equipment and tools needed for acceptance testing, documenting performance, and finding problems in a physical fiber plant. The emphasis is on understanding proper OTDR settings, testing, and evaluation of results. Week 2 – focuses on fault location, troubleshooting, and test equipment with a heavy emphasis on hands-on skills training that simulates actual field restorations for retrievable and non-retrievable slack scenarios utilizing real-world scenarios and programmed scenarios with a network simulator.
5. **ETA Fiber Optic Installer Certification:** The Fiber Optic Installer standalone certification is for individuals trained in the practice of installing fiber optic cabling at premises facilities.
6. **Employability Skills Training & Resume Prep:** A comprehensive program designed to equip participants with the essential skills and knowledge needed to enhance their employability and succeed in today's competitive job market and learn strategies for crafting compelling resumes that highlight their qualifications and experiences. Through a combination of interactive sessions, practical exercises, and real-world applications, participants will develop a strong foundation of transferable skills and strategies that will enable them to excel in their careers and secure meaningful employment opportunities.
7. **Advanced Fiber Optic Technician:** Completion of elements 1-4 for OSU-IT's Advanced Fiber Optic Technician Micro-Credentials Program.

More details on the above courses and the overall program are available at

https://osuit.edu/workforce/ntia_fiber_technician.php³

Oklahoma has taken multiple steps to address a highly skilled workforce capable of carrying out the work in a safe and effective manner. In 2022, the Oklahoma Legislature appropriated \$11.2 million in American Rescue Plan Act funding to establish and expand Oklahoma CareerTech workforce development programs, including \$5 million to CareerTech to create a program to train broadband infrastructure installation workers.⁴ Supporting the workforce development effort include the following technology centers:

- Wes Watkins Technology Center www.wwtech.org
- Northwest Technology Center nwtech.edu
- Pontotoc Technology Center www.pontotocotech.edu
- Gordon Cooper Technology Center www.gctech.edu

³ https://osuit.edu/workforce/ntia_fiber_technician.php

⁴ <https://oklahoma.gov/careertech/media-center/press-releases/2022/legislature-approves--11-2-million-to-expand-careertech-programs.html>

Multiple centers have chosen the OSU-IT program and are working closely with the university on a memorandum of understanding contract. The OBO will continue to monitor and promote the expansion of these programs and encourage CareerTech to implement curriculum and training programs to meet the workforce needs of broadband deployment.

In addition, a few Tribal Nations in Oklahoma are providing workforce development opportunities. The Cheyenne and Arapaho Tribes are working with OSU-IT to train broadband workers. The Osage Nation is working with [Tri-County Technical College](#). Through Tri-County, participants will go through a two-week training program then become an apprentice at an ISP or engineering company. These types of unique partnerships allow the tribal nations to easily facilitate and encourage their members to pursue careers in the broadband field. The OBO plans to continue sharing and encouraging other tribal nations in similar partnerships.

- 3. Provide equitable on-ramps into broadband-related jobs, maintain job quality for new and incumbent workers engaged in the sector, and continually engage with labor organizations and community-based organizations to maintain a voice throughout the planning and implementation process.***

The Oklahoma Department of Career and Technology Education is focused on developing a "world-class workforce" by providing skills and training services to education institutions across the state, including technology centers.⁵ Oklahoma has 29 technology centers on 60 campuses that "serve high school and adult learners with specialized career training in more than 90 instructional areas." Their strategic plan outlines key education attainment goals, including expanding enrollment across the system by 25% to increase learning opportunities for career and technology training. They also set goals around partnership, looking to enhance education/industry partnerships and find new student work-based learning opportunities.

This work at the state and local level also aligns with many of the strategies and objectives of the Oklahoma Digital Equity Plan. Increased technology access and usage will allow more students and job seekers to participate in education and upskilling programs to earn post-secondary credentials, supporting efforts to reach these learning and workforce goals and create a more skilled Oklahoma workforce.

- 4. Ensure that the job opportunities created by the BEAD program and other broadband programs are available to a diverse worker pool.***

The OBO will work with partners to ensure job opportunities are available to a diverse job pool. A sampling of partners supporting the workforce efforts is included below. A more comprehensive listing is available in the Oklahoma Five-Year Action Plan.

- **Oklahoma Digital Inclusion Alliance** is composed of various nonprofit entities and local state agencies dedicated to bringing broadband access, affordable personal devices, and local technology training to the public. The alliance also provides financial and operational resources for digital inclusion programs while serving as a bridge for policymakers and the public.
- **Oklahoma Digital Equity Coalition**, formed by the OBO, provides insight and recommendations around barriers to accessing and using affordable, reliable high-speed internet. Representatives from

⁵ <https://oklahoma.gov/content/dam/ok/en/careertech/about/reports/strategic-plan/strategic-plan.pdf>

research institutions, nonprofit organizations representing covered populations, state agencies, and Tribal governments serve on the coalition.

- **Oklahoma CareerTech Technology Centers** includes 29 technology centers across 60 campuses, serving high school and adult learners with more than 90 instructional courses, including the likes of cyber security forensics and network/computer systems admin.
- **Oklahoma Native Assets Coalition (ONAC)** works with tribes and community partners who are dedicated to increasing opportunities for economic self-sufficiency for Native communities through financial education, banking assistance, and asset-building strategies.

As shown through the many partnerships and related efforts, the OBO will develop and promote sector-based partnerships among employers, education and training providers, the public workforce system, worker organizations, and community-based organizations that provide relevant training and wrap-around services to support workers to access and complete training, to attract, train, retain, or transition to meet local workforce needs and increase high-quality job opportunities.

Furthermore, the OBO will ensure equitable on-ramps into broadband-related jobs, maintain job quality for new and incumbent workers engaged in the sector, and continually engage with worker organizations and community-based organizations to maintain worker voice throughout the planning and implementation process.

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

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

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

- a. The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce;
- b. For each job title required to carry out the proposed work (including contractors and subcontractors), a description of:
 - i. Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a

- robust in-house training program with established requirements tied to certifications, titles; and
- ii. Information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.

The OBO will ensure the project workforce is appropriately skilled and credentialed. While Oklahoma is a Right to Work state, state law prevents the OBO from requiring subgrantees to use exclusively unionized labor. Regardless, all subgrantees will be required to maintain the highest workforce standards. The Oklahoma BEAD application process will require subgrantees to describe workforce standards and will be a scored metric in the selection process.

Through the educational and selection process, the OBO will ensure that subgrantees understand their obligations to ensure the following items.

1. Subgrantees will ensure their plan includes an appropriate workforce training program to ensure that workers are appropriately skilled and credentialed (through registered apprenticeships or training programs that serve all workers), comprising workers of the subgrantee and all its contractors and subcontractors. This may be accomplished internally or through partnerships with other training and education organizations.
2. Subgrantees have plans to contract and/or subcontract a sufficient workforce to carry out the proposed work.
3. All project workforce members will have the appropriate credentials (e.g., appropriate and relevant pre-existing occupational training, certification, and licensure).
4. All workforce members have appropriate safety training to ensure a safe workplace.
5. Subgrantees are encouraging minority businesses, women-owned business enterprises, and labor surplus area firms are being recruited, used, and retained throughout the project.

Irrespective of the union status of the subgrantee, its contractors, and subcontractors, the subgrantee will be required to submit, in their application, workforce details. Applicants who fail to provide the appropriate information or meet the minimum requirements for ensuring an equitable, skilled, credentialed, and qualified workforce will not be considered for BEAD funding.

Details required from subgrantees are below:

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

2.9 Minority Business Enterprises (MBEs)/ Women’s Business Enterprises (WBEs)/ Labor Surplus Firms Inclusion (Requirement 13)

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

Oklahoma is home to bustling business and industry ranging from agriculture to health care to manufacturing. The business landscape is heavily influenced by minority and women-owned business enterprises who contribute to the state’s workforce expansion, revenue growth, and overall economic development exponentially. In Oklahoma, the Tribal community plays an integral role in driving business growth and retention. As such, the OBO is committed to ensuring minority businesses, women’s business enterprises, and labor surplus area firms are engaged, when possible, through state and local efforts.

Pursuant to 2 C.F.R. § 200.321⁶, the OBO will utilize the following measures to ensure that minority businesses, women business enterprises, and labor surplus area firms are engaged, when possible, in the contracting process:

- a. Placing qualified small and minority businesses, and women's business enterprises on solicitation lists;
- b. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
- e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- f. Requiring subgrantees to abide by the same affirmative steps listed above.

The Oklahoma Department of Commerce serves as the point of contact for aspiring and established business owners. The Department provides resources, programs, and information for new business owners who are just getting started and current business owners who are seeking development opportunities. State procurement, solicitation, and purchasing programs are processed through the Office of Management and Enterprise Services (OMES). Both departments have free, public websites for business owners to visit to learn more about certification programs and to connect with a state employee to learn more.

Some of the key programs offered for MBEs, WBEs, and Labor Surplus Firms throughout the state include⁷:

- Minority Business Certification Programs
 - Oklahoma Department of Transportation provides a “Disadvantaged Business Enterprise” (DBE) certification for minority-and women owned businesses in Oklahoma.
 - Oklahoma Department of Commerce provides a Women-Owned Business Certification. To qualify, the female owner(s) must hold 51% or more of the ownership of the business and

⁶ <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d/section-200.321>

⁷ <https://www.okcommerce.gov/doing-business/business-services/minority-owned-business-information/>

- have full operation control.
- The city of Tulsa, Oklahoma has a Small Business Enterprise Program that provides small businesses the opportunity to be on a preferred list of vendors that provide services and products to the city. The program includes educational, partnership, and networking opportunities to develop managerial and communication skills to assist business growth. Participating businesses must be located in the Tulsa Metropolitan Statistical Area (Tulsa, Osage, Rogers, Pawnee, Wagoner, Cree, and Okmulgee counties).
- Tribal Employment Right Ordinance certification program support the use of Indian-owned businesses in providing products and services purchased by the tribal nations. Preference is given to businesses owned by members of specific tribal nations within the program; then to businesses owned by those who are members of other tribal nations.
- Chambers of Commerce
 - American Indian Chamber of Commerce of Oklahoma
 - Metro Oklahoma City Black Chamber of Commerce
 - Greenwood Chamber of Commerce (Tulsa)
 - Greater Tulsa Hispanic Chamber of Commerce
 - Greater Oklahoma City Hispanic Chamber of Commerce
- Oklahoma Small Business Development Centers
- REI Women’s Business Center
- SCORE Oklahoma City
- SCORE Tulsa

The OBO will build upon these existent resources and the vast network of Chambers of Commerce across the state to encourage participation. All contract/subcontract information will be publicly available online. The OBO will include a certification requirement for BEAD applicants at the time of application. Certification will also be required in the grant agreement. The OBO will track engagement metrics—including recruitment, utilization, and retainment—of key enterprises to measure inclusion of historically underutilized businesses.

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

- a. Placing qualified small and minority businesses and women’s business enterprises on solicitation lists;
- b. Assuring that small and minority businesses, and women’s business enterprises are solicited whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women’s business enterprises;
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women’s business enterprises;
- e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency

- of the Department of Commerce; and
- f. Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

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

2.10 Cost and Barrier Reduction (Requirement 14)

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

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

On May 28, 2019, Governor Kevin Stitt released the Oklahoma Broadband Plan^[1]. Recognizing Oklahoma as having one of the lowest regulatory and legal barriers to installing broadband at the time, still the state ranked 45th in connectivity. According to the Plan, it focused on state grants in rural communities, encourages public-private partnerships in the 117 Opportunity Zones, and streamlines permitting in the state's rights-of-way. The ambitious Plan laid out several tasks to understand and address the challenges, barriers, and costs impeding broadband deployment in rural areas of the state.

Governor Stitt followed-up on this commitment to rural Oklahoma by signing HB 3363 (the Oklahoma Broadband Expansion Act) in May 2022. HB 3363 created the Broadband Governing Board along with the OBO, which was funded and tasked with leveraging the successful progress of the Broadband Plan to implement the NTIA BEAD Program.

Started in the Oklahoma Broadband Plan, the OBO continues to identify and explore avenues for reducing the cost and barriers to broadband deployment. Some of the areas identified in the original Plan are listed below. The OBO continues to study ways to impact each area.

- **Broadband Mapping**
 - Improve understanding of unserved/served areas, resulting in better cost estimates, deployment time and progress.
 - Enable more effective targeting of funds in current and future government programs.
 - Speed rural Oklahoma's access to broadband benefits including eCommerce, eLearning, and telehealth.
- **Dig Once Policy**
 - This policy would require public and private excavators to coordinate with local and state governments on the installation of extra fiber or conduit whenever ground will be broken in the public right-of-way (PROW).
- **Broadband Ready Designations**

- The appointment of a single point of contact for all matters related to broadband development projects.
- A requirement that all permit applications are approved or denied within 10 business days after they are filed.
- Assurance that all inspections related to a broadband project will be completed in a timely and expeditious manner.
- **Analysis of State Assets for Broadband**
 - Leveraging the state’s resources and relationships to identify potential target areas for broadband expansion.
- **Broadband on State Rights-of-Way**
 - Develop a strategy to streamline the permitting process to access rights-of-way by addressing the length of time it takes to secure required approvals as well as the compensation that is requested for accessing rights-of-way.
- **State Grant Funding**
 - Appropriate \$5M in state grant funding for the expansion of broadband infrastructure in rural Oklahoma.

^[1] <https://onenet.net/wp-content/uploads/2020/03/Oklahoma-State-Broadband-Plan-October-2019-Accessible.pdf>

2.11 Climate Assessment (Requirement 15)

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

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

This proposal identifies a plan for addressing threats of severe weather events within Oklahoma, and by implementing mitigation measures, the OBO can minimize the impacts of future climate risks on broadband infrastructure.

Tornados, flooding, winds, severe cold snaps, and occasional earthquakes all contribute to the need for resilient network topologies and regional/state-wide mitigation approaches that work to safeguard broadband networks and the life-saving communications services they provide.

Future deployments of fiber broadband infrastructure will need to consider the impact of current and future climate change. Adaptable decision support capabilities that include risk awareness along with prospective subgrantee objectives (e.g., revenue growth, operational cost control, etc.) will be important in the overall planning process and execution. Primary aspects of risk-aware deployment include developing cost-effective methodologies for hardening fiber cables, conduits, and other infrastructure to be more resistant to severe weather consequential to climate change. This will be a difficult and costly task in rural, low-density areas where current ISPs already face numerous challenges deploying financially viable networks. These decisions will require ongoing discussions with prospective subgrantees throughout the application, selection, and award processes.

- a. Identify the geographic areas that should be subject to an initial hazard screening for current and projected future weather and climate-related risks and the time scales for performing such screenings;

Though any extreme weather event can affect broadband networks, those that are most concerning in Oklahoma include tornadoes, severe thunderstorms (lightning and strong winds), flooding, and heavy snow/freezing ice. Each of these events can cause widespread, material damage to networks regardless of aerial or underground construction.

According to the Koppen climate classification^[1], Oklahoma's climate ranges from humid subtropical in the east to semi-arid in the west. Warm, moist air moving northward from the Gulf of Mexico often exerts much influence, particularly over the southern and eastern portions of the state, where humidity, cloudiness, and precipitation are subsequently greater than in western and northern sections. Summers are long and usually quite hot. Winters are shorter and less severe than those of the more northern Plains states. Periods of extreme cold are infrequent, and those lasting more than a few days are rare.

As the OBO looks to regionalize these primary events, tornadoes can cause extreme damage at impact along the entire state. Cold weather-related events such as snow and ice storms can wreak havoc with aerial broadband networks as falling trees knock down utility poles throughout an affected area. Heavy winter storms generally affect the panhandle and northwest portion of the state.

Thunderstorms and associated flash flooding of creeks and minor streams remain a serious threat statewide, especially in urban and suburban areas, where development and removal of vegetation have increased runoff.

- b. Characterize which projected weather and climate hazards may be most important to account for and respond to in these areas and over the relevant time horizons;

The following weather and climate hazards pose the most relevant and critical threat to broadband networks deployed with BEAD funding.

- Tornadoes – Tornadoes are a major concern across Oklahoma. Since 1950, an average of 53 tornadoes have been observed annually within the state's borders. Tornadoes can occur at any time of year but are most frequent during springtime. Three-fourths of Oklahoma's tornadoes have occurred during April, May, and June. The most active month is May with an average of 20 events.
 - Thunderstorms – On average, thunderstorms, along with associated wind, rain, and lightning occur about 55 days per year in eastern Oklahoma, 45 days per year in the southwest, and nearly 60 days annually in the extreme western panhandle. Late spring and early summer are the peak seasons for thunderstorms.
 - Flooding – Flooding of major rivers and tributaries may happen during any season, but they occur with the greatest frequency during spring and autumn months associated with the greatest rainfall. Flood prevention programs over the past several decades have reduced the frequency and severity of such events. However, two-thirds of the watershed dams managed by the Conservation Commission have met or exceeded their 50-year design life.
 - Snow/Ice – Both snow and ice buildup can cause extensive network destruction as overburdened trees fall on aerial networks causing damage to aerial utility infrastructure. Also, icy roads create traffic hazards that result in vehicle crashes into utility poles and roadside network cabinets.
- c. Characterize any weather and climate risks to new infrastructure deployed using BEAD Program funds for the 20 years following deployment;

The OBO has identified the weather and climate risks to new infrastructure deployments using BEAD program funds for the 20 years following deployment.

As described above, statewide physical climate risks that threaten broadband infrastructure include:

1. Flooding from severe thunderstorms can result in flooding of underground infrastructure cabinets and vaults from overwhelmed storm water drainage systems.
2. Wind-driven events like tornadoes and heavy thunderstorms can easily bring down aerial utility lines or summarily fell trees onto utility lines with catastrophic results.
3. Severe freeze or ice storms, though infrequent in most of Oklahoma, tend to cause devastation with aerial networks. More often, snow and ice buildup cause trees to fall under the immense weight bringing down aerial infrastructure.
4. In each of the instances above the effect is not only on the broadband network but also the electrical grid's capacity to remain in service.

Of significant concern is the ability to replace and restore network functionality after a climate-related event. Material and labor resources are typically in acute shortage and high demand, plus access to affected network infrastructure can be challenging.

- d. Identify how the proposed plan will avoid and/or mitigate weather and climate risks identified;

For the identified extreme weather and climate hazards described above, the OBO may require that subgrantees implement some or all the following mitigation measures.

- Incorporating climate resilience into infrastructure design such as underground construction versus aerial and using waterproof connectors throughout.
 - Developing emergency response plans and communication strategies to ensure timely and effective response to extreme weather events.
 - Develop a minimum emergency inventory of critical components to guarantee timely restoration.
- e. Describe plans for periodically repeating this process over the life of the Program to ensure that evolving risks are understood, characterized, and addressed, and that the most up-to-date tools and information resources are utilized.

The Oklahoma Department of Emergency Management and Homeland Security (ODEMHS)^[2] prepares for, responds to, recovers from, and mitigates against disasters and emergencies. The department maintains the State Emergency Operations Center which serves as a command center for reporting emergencies and coordinating state response activities.

The Oklahoma Mesonet^[3] is a world-class network of environmental monitoring stations and consists of 120 automated stations covering Oklahoma with at least one Mesonet station in each of Oklahoma's 77 counties. Hazardous weather events happen (or don't happen) usually because of subtle features that can be found in the data-rich Oklahoma Mesonet.

Mesonet stations are critical infrastructure required to establish a long-term climate record for the state. Station observations have been especially critical for predicting and preparing for extreme weather events like droughts, floods, ice storms, and severe convective storms, which can produce extensive rain, lightning, tornadoes, hail, and destructive winds.

The Oklahoma Climatological Survey^[4] was established by the University of Oklahoma in 1980 to provide climate services to the people of Oklahoma. In 1982, OCS was established under Oklahoma Sunset Law as a state entity. The Survey maintains an extensive array of climatological information, operates the Oklahoma Mesonet, and hosts a wide variety of educational outreach and scientific research projects.

The OBO will develop and periodically repeat a screening process over the life of the BEAD program to ensure that evolving risks from climate-related hazards are understood and communicated to the provider community. The OBO will continue to communicate with the various state and federal agencies such as those listed above as well as monitor state and federal informational resources to provide assurance that the ongoing plan remains useful in addressing potential climate threats.

^[1] <https://www.britannica.com/science/Koppen-climate-classification>

^[2] <https://oklahoma.gov/oem.html>

^[3] <https://www.mesonet.org/>

^[4] <https://climate.ok.gov/index.php>

2.12 Low-Cost Broadband Service Option (Requirement 16)

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

addresses the following, as outlined on page 67 of the BEAD NOFO:

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

Section IV.C.2.ii.c.i of the BEAD NOFO requires the OBO to include a middle-class affordability plan to ensure all consumers have access to affordable high-speed internet. Subgrantees receiving BEAD funds from the OBO are required to offer at least one "low-cost broadband service option" that must remain available to eligible subscribers for the useful life of the network assets. Eligible subscribers are defined as those who qualify for either the ACP or the Lifeline program, but the OBO may introduce a new eligibility definition if the ACP ceases to operate, to ensure consistency of eligibility standards.

Subgrantees are required to participate in the ACP and are encouraged to participate in any successor broadband subsidy programs should funding for the ACP be depleted and the Program not renewed.

The OBO proposes the low-cost broadband service option be defined as the following:

- Costs \$60 per month or less, inclusive of all taxes, fees, and charges if the subscriber does not reside on Tribal Lands, or \$75 per month or less, inclusive of all taxes, fees, and charges if the subscriber resides on Tribal Lands, with no additional non-recurring costs or fees to the customer.
- Allows the end user to apply the ACP benefit subsidy to the service price and makes a demonstrable effort to inform prospective customers of these programs and the steps necessary to enroll and apply the benefit to the service plan. No additional eligibility restrictions beyond those applicable to the ACP should be imposed.
- Provides consistent and reliable download speeds of at least 100Mbps and consistent and reliable upload speeds of at least 20 Mbps.
- Provides typical latency measurements of no more than 100 milliseconds.
- Is not subject to data caps, surcharges, or usage-based throttling, and is subject only to the same acceptable use policies to which subscribers to all other broadband internet access service plans offered to home subscribers by the participating subgrantee must adhere.
- In the event the applicant later offers a low-cost plan with higher speeds downstream and/or upstream, permits eligible subscribers that are subscribed to a low-cost broadband service option to upgrade to the new low-cost offering at little to no cost.

2.12.2 Check Box: Certify that all subgrantees will be required to participate in the Affordable Connectivity Program or any successor program.

The OBO will require all subgrantees to participate in the ACP or any successor program, and eligible subscribers who are eligible for a broadband service subsidy can apply for the subsidy to the proposed service option.

2.13 Middle-Class Affordability Plans (Requirement 20)

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

The BEAD NOFO urges states to look beyond infrastructure investment and the required low-cost service option and target broadband affordability throughout the state:

Accordingly, each Eligible Entity must include in its Initial and Final Proposals, a middle-class affordability plan to ensure that all consumers have access to affordable high-speed internet. We expect that Eligible Entities will adopt diverse strategies to achieve this objective.

The OBO shares the NTIA's concern that many Oklahoma residents may find broadband service unaffordable. The OBO will seek to create affordability programs through its statutory powers, partnerships with other state agencies, and relationships among ISPs. Due to the unserved and underserved areas across Oklahoma, it is unlikely that funding would be available for a large impact on middle-class broadband pricing. However, the OBO will seek to influence the price of broadband service for all residents where possible through the BEAD program implementation and the awarding of funds to eligible subgrantees.

The OBO expects that a side-effect of the program implementation will be improving the affordability of broadband service for all residents. The main strategies from which the OBO hopes for this result are:

Competition

The BEAD program will increase broadband availability in Oklahoma. As past efforts have shown, an increase of broadband availability can improve affordability, though the effects will vary locally and have a limited effect on locations not in the BEAD program's footprint.

Special pricing for low-income households.

As noted in the prior section, BEAD subgrantees will be required to offer special pricing arrangements for low-income households, increasing the overall number of subscribers and the ability to spread out fixed network costs. A subgrantee's ability to spread fixed costs over additional customers will reduce the broadband price necessary to break even.

These strategies may have a limited impact. Due to the priority of BEAD funding, areas not designated to be unserved or underserved areas will not be targeted, and funds for a given area are awarded to only one eligible subgrantee.

Additionally, the OBO is planning an additional listening tour in late 2023. The tour will focus on digital equity and broadband affordability. Input on middle-class broadband affordability will be solicited across Oklahoma in hopes of identifying new strategies to positively impact the challenge.

Detailed information on broadband pricing across the state would be helpful to fully understand the extent of the middle-class affordability problem. The OBO would welcome the NTIA's assistance in securing broadband pricing data that could help the state assess the affordability problem and develop strategies to address any problems identified. Furthermore, if data were available, the OBO would be able to promote consumer pricing benchmarks that provide consumers with an objective criterion to use in determining whether the rate offerings of broadband service providers are reasonable. The data would also allow the OBO to encourage affordable pricing.

2.14 Use of 20 Percent of Funding (Requirement 17)

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

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

The OBO does not intend to make any early BEAD grants to subgrantees under the Initial Proposal prior to the approval of the Final Proposal, because the OBO is already administering SLFRF and CPF broadband grant programs, and it faces complex coordination requirements that would only be escalated if early BEAD grantmaking took place at the same time.

However, the OBO does wish to access BEAD funding early for administrative and programmatic purposes. Major efforts will need to be undertaken in the course of 2024 to carry out the BEAD challenge process, BEAD subgrantee selection, and other planned activities under this Initial Proposal. The OBO values the NTIA partnership and the opportunity to work in cooperation with the NTIA in advance of the final proposal approval. To help with these activities, the OBO deems it advisable to access some of the 2% administrative funds that are allocated to states under the IJA.

Current NTIA guidance indicates that the Initial Proposal Funding Package can be used to fund the administration and programmatic costs of the challenge process and the subgrantee selection. The OBO assumes that any funds accessed through the Initial Proposal Funding Package and used for these expenses will be allowable as long as the total costs lie well within the 2% administrative expenses and 1% of programmatic ceilings.

Accordingly, the OBO will be submitting a separate Initial Proposal Funding Package, as directed by NTIA

guidance, detailing these expenses, in hopes of unlocking funds needed to cover its costs between the approval of the Initial Proposal and the approval of the Final Proposal. The initial proposal funding request will include requests for administrative personnel and operations at the OBO with enough programmatic funding to run work with NTIA to execute the Oklahoma BEAD challenge process and subgrantee selection process.

For more information on the OBO's implementation of the NTIA BEAD challenge process can be found in Section 1.4 (Requirement 7). Additional details on the subgrantee selection process can be found in Section 2.4 (Requirement 8).

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

The funding request will be approximately \$15,948,713, representing 2% of the BEAD allocation.

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

The OBO will adhere to all BEAD Program requirements regarding Initial Proposal funds usage.

2.15 Eligible Entity Regulatory Approach (Requirement 18)

2.15.1 Text Box:

- a. Disclose whether the Eligible Entity will waive all laws of the Eligible Entity concerning broadband, utility services, or similar subjects, whether they predate or postdate enactment of the Infrastructure Act that either (a) preclude certain public sector providers from participation in the subgrant competition or (b) impose specific requirements on public sector entities, such as limitations on the sources of financing, the required imputation of costs not actually incurred by the public sector entity, or restrictions on the service a public sector entity can offer.
- b. If the Eligible Entity will not waive all such laws for BEAD Program project selection purposes, identify those that it will not waive (using the Excel attachment) and their date of enactment and describe how they will be applied in connection with the competition for subgrants. If there are no applicable laws, note such.

Not applicable.

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

2.16 Certification of Compliance with BEAD Requirements (Requirement 19)

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

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

- a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize);
- b. The inclusion of clawback provisions (i.e., provisions allowing recoupment of funds previously disbursed) in agreements between the Eligible Entity and any subgrantee;
- c. Timely subgrantee reporting mandates; and
- d. Robust subgrantee monitoring practices.

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

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

Cybersecurity

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

Supply Chain Risk Management (SCRM)

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

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

2.17 Volume II Public Comment

2.17.1 **Text Box:** Describe the public comment period and provide a high-level summary of the comments received during the Volume II public comment period and how they were addressed by the Eligible Entity. The response must demonstrate:

- a. The public comment period was no less than 30 days; and
- b. Outreach and engagement activities were conducted to encourage feedback during the public comment period.

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

Appendix A: Public Meeting Agenda

Agenda

- Oklahoma landscape & broadband context
- Overview of BEAD and DEA (federal funding programs)
- Discussion about regional broadband context
 - Barriers
 - Opportunities
 - Priorities for state planning
- Next Steps

Appendix B: Dear Tribal Leader Letters



OKLAHOMA

State Broadband
Office

March 9, 2023

Governor John Johnson
Absentee-Shawnee Tribe of Indians of Oklahoma
2025 S Gordon Cooper Dr.
Shawnee, OK 74801

Dear Governor Johnson:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to highspeed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Absentee-Shawnee Tribe of Indians of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Absentee-Shawnee Tribe of Indians of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March or April, depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Absentee-Shawnee Tribe of Indians of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Absentee-Shawnee Tribe of Indians of Oklahoma in achieving connectivity goals.

We welcome you to provide a March or April date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Absentee-Shawnee Tribe of Indians of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chief Samuel Marshall
Alabama-Quassarte Tribal Town
2122 Highway 27
Wetumka, OK 74883-9504

Dear Chief Marshall:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to highspeed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Alabama-Quassarte Tribal Town. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submit to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Alabama-Quassarte Tribal Town is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Alabama-Quassarte Tribal Town.
- Identify ways that OBGB can coordinate with and support the Alabama-Quassarte Tribal Town in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Alabama-Quassarte Tribal Town as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chairman Durrell Cooper
Apache Tribe of Oklahoma
PO Box 1330
Anadarko, OK 73005-1330

Dear Chairman Cooper:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Apache Tribe of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Apache Tribe of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Apache Tribe of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Apache Tribe of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Apache Tribe of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chairperson Tamara Francis Four Killer
Caddo Nation of Oklahoma
PO Box 487
Binger, OK 73009-0487

Dear Chairperson Tamara Francis Four Killer:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Caddo Nation of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submit to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Caddo Nation of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Caddo Nation of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Caddo Nation of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Caddo Nation of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chief Chuck Hoskin
Cherokee Nation
PO Box 948
Tahlequah, OK 74465-0948

Dear Chief Hoskin:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Cherokee Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Cherokee Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Cherokee Nation.
- Identify ways that OBGB can coordinate with and support the Cherokee Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Cherokee Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Governor Reggie Wassana
Cheyenne & Arapaho Tribes
PO Box 38
Concho, OK 73022-0038

Dear Governor Wassana:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to highspeed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Cheyenne and Arapaho Tribes. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submit to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Cheyenne and Arapaho Tribes is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Cheyenne and Arapaho Tribes.
- Identify ways that OBGB can coordinate with and support the Cheyenne and Arapaho Tribes in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Cheyenne and Arapaho Tribes as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

March 9, 2023

Chairman John Barrett
Citizen Potawatomi Nation
1601 S Gordon Cooper Dr
Shawnee, OK 74801

Dear Chairman Barrett:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Citizen Potawatomi Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Citizen Potawatomi Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Citizen Potawatomi Nation.
- Identify ways that OBGB can coordinate with and support the Citizen Potawatomi Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Citizen Potawatomi Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', with a stylized, flowing script.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

March 9, 2023

Chairman William Nelson
Comanche Nation of Oklahoma
PO Box 908
Lawton, OK 73502-0908

Dear Chairman Nelson:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Comanche Nation of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Comanche Nation of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Comanche Nation of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Comanche Nation of Oklahomain achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Comanche Nation of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

President Deborah Dotson
Delaware Nation
PO Box 825
Anadarko, OK 73005-0825

Dear President Dotson:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Delaware Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Delaware Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Delaware Nation.
- Identify ways that OBGB can coordinate with and support the Delaware Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Delaware Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chief Brad Kills Crow
Delaware Tribe of Indians
5100 Tuxedo Blvd
Bartlesville, OK 74006-2828

Dear Chief Kills Crow:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Delaware Tribe of Indians. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Delaware Tribe of Indians is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Delaware Tribe of Indians.
- Identify ways that OBGB can coordinate with and support the Delaware Tribe of Indians in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Delaware Tribe of Indians as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chief Glenna Wallace
Eastern Shawnee Tribe of Oklahoma
10080 S Bluejacket Rd.
Wyandotte, OK 74370

Dear Chief Wallace:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Eastern Shawnee Tribe of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submit to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Eastern Shawnee Tribe of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Eastern Shawnee Tribe of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Eastern Shawnee Tribe of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Eastern Shawnee Tribe of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chairman Geoff Rolland
Euclidean (Yuchi) Tribe
170 N Barbara Ave
Bartlesville, OK 74006-2746

Dear Chairman Rolland:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Euclidean (Yuchi) Tribe. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submit to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Euclidean (Yuchi) Tribe is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Euchee (Yuchi) Tribe.
- Identify ways that OBGB can coordinate with and support the Euchee (Yuchi) Tribe in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Euchee (Yuchi) Tribe as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chairwoman Lori Gooday Ware
Fort Sill Apache Tribe of Oklahoma
43187 US Highway 281
Apache, OK 73006

Dear Chairwoman Ware:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Fort Sill Apache Tribe of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Fort Sill Apache Tribe of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policies related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Fort Sill Apache Tribe of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Fort Sill Apache Tribe of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Fort Sill Apache Tribe of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", with a stylized flourish at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

March 9, 2023

Chairman Edgar Kent
Iowa Tribe of Oklahoma
335588 E 750 Rd
Perkins, OK 74059-3268

Dear Chairman Kent:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Iowa Tribe of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Iowa Tribe of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policies related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Iowa Tribe of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Iowa Tribe of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Iowa Tribe of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chairwoman Lynn Williams
Kaw Nation of Oklahoma
PO Box 50
Kaw City, OK 74641-0050

Dear Chairwoman Williams:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Kaw Nation of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Kaw Nation of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Kaw Nation of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Kaw Nation of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Kaw Nation of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Town King Brian Givens
Kialegee Tribal Town
PO Box 332
Wetumka, OK 74883-0332

Dear Town King Givens:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Kialegee Tribal Town. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submit to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Kialegee Tribal Town is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Kialegee Tribal Town.
- Identify ways that OBGB can coordinate with and support the Kialegee Tribal Town in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Kialegee Tribal Town as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chairman Darwin Kaskaske
Kickapoo Tribe of Oklahoma
PO Box 70
McCloud, OK 74851-0070

Dear Chairman Kaskaske:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Kickapoo Tribe of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submit to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of The Kickapoo Tribe of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of The Kickapoo Tribe of Oklahoma.
- Identify ways that OBGB can coordinate with and support The Kickapoo Tribe of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with The Kickapoo Tribe of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a large initial "M" and "F".

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Tribal Chairman Lawrence Spottedbird
Kiowa Indian Tribe of Oklahoma
PO Box 369
Carnegie, OK 73015-0369

Dear Chairman Spottedbird:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Kiowa Indian Tribe of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Kiowa Indian Tribe of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Kiowa Indian Tribe of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Kiowa Indian Tribe of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Kiowa Indian Tribe of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA
State Broadband
Office

March 9, 2023

Chief Douglas Lankford
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355-1326

Dear Chief Lankford:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Miami Tribe of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Miami Tribe of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Miami Tribe of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Miami Tribe of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Miami Tribe of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

March 9, 2023

Chief Bill Follis
Modoc Nation
515 G St SE
Miami, OK 74354-8224

Dear Chief Follis:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Modoc Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Modoc Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Modoc Nation.
- Identify ways that OBGB can coordinate with and support the Modoc Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Modoc Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a large loop at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 8, 2023

Chairman John Shotton
Otoe-Missouria Tribe of Indians
8151 Highway 177
Red Rock, OK 74651-0348

Dear Chairman Shotton:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Otoe-Missouria Tribe of Indians. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Otoe-Missouria Tribe of Indians is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understand the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Otoe-Missouria Tribe of Indians.
- Identify ways that OBGB can coordinate with and support the Otoe-Missouria Tribe of Indians in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Otoe-Missouria Tribe of Indians as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chief Ethel Cook
Ottawa Tribe of Oklahoma
PO Box 110
Red Rock, OK 74355-0110

Dear Chief Cook:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Ottawa Tribe of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Ottawa Tribe of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understand the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Ottawa Tribe of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Ottawa Tribe of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Ottawa Tribe of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

President Walter Echo-Hawk
Pawnee Nation
PO Box 470
Pawnee, OK 74058-0470

Dear President Echo-Hawk:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Pawnee Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Pawnee Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understand the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Pawnee Nation.
- Identify ways that OBGB can coordinate with and support the Pawnee Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Pawnee Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

March 9, 2023

Chief Craig Harper
Peoria Tribe of Indians of Oklahoma
PO Box 1527
Miami, OK 74355-1527

Dear Chief Harper:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Peoria Tribe of Indians of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Peoria Tribe of Indians of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Peoria Tribe of Indians of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Peoria Tribe of Indians of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Peoria Tribe of Indians of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 10, 2023

Chairman Oliver Littlecook
Ponca Tribe of Indians of Oklahoma
20 White Eagle Dr
Ponca City, OK 74601

Dear Chairman Littlecook:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Ponca Tribe of Indians of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Ponca Tribe of Indians of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Ponca Tribe of Indians of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Ponca Tribe of Indians of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Ponca Tribe of Indians of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

March 9, 2023

Chairman Joseph Byrd
Quapaw Nation
PO Box 765
Quapaw, OK 74363-0765

Dear Chairman Byrd:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Quapaw Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Quapaw Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Quapaw Nation.
- Identify ways that OBGB can coordinate with and support the Quapaw Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Quapaw Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

March 9, 2023

Chief Justin Wood
Sac and Fox Nation
920883 S Highway 99 Bldg. A
Stroud, OK 74079

Dear Chief Wood:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Sac and Fox Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Sac and Fox Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understand the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Sac and Fox Nation.
- Identify ways that OBGB can coordinate with and support the Sac and Fox Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Sac and Fox Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA
State Broadband
Office

March 9, 2023

Chief William Fisher
Seneca-Cayuga Nation
23701 S 655 Rd
Grove, OK 74344

Dear Chief Fisher:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Seneca-Cayuga Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Seneca-Cayuga Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understand the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Seneca-Cayuga Nation.
- Identify ways that OBGB can coordinate with and support the Seneca-Cayuga Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Seneca-Cayuga Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA
State Broadband
Office

March 9, 2023

Tribal Administrator Cassie Harper
Shawnee Tribe
PO Box 189
Miami, OK 74355-0189

Dear Tribal Administrator Harper:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Shawnee Tribe. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Shawnee Tribe is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understand the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Shawnee Tribe.
- Identify ways that OBGB can coordinate with and support the Shawnee Tribe in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Shawnee Tribe as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Governor Bill Anoatubby
The Chickasaw Nation
PO Box 1548
Ada, OK 74820-1548

Dear Governor Anoatubby:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with The Chickasaw Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of The Chickasaw Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of The Chickasaw Nation.
- Identify ways that OBGB can coordinate with and support The Chickasaw Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with The Chickasaw Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 9, 2023

Chief Gary Batton
The Choctaw Nation
PO Box 1210
Durant, OK 74702-1210

Dear Chief Batton:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with The Choctaw Nation of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities, resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submit to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of The Choctaw Nation of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of The Choctaw Nation of Oklahoma.
- Identify ways that OBGB can coordinate with and support The Choctaw Nation of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with The Choctaw Nation of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 10, 2023

Chief David Hill
The Muscogee Nation
PO Box 580
Okmulgee, OK 74447

Dear Chief Hill:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to highspeed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with The Muscogee Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of The Muscogee Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of The Muscogee Nation.
- Identify ways that OBGB can coordinate with and support The Muscogee Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with The Muscogee Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Fina', written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

March 10, 2023

Chief Geoffrey Standing Bear
The Osage Nation
627 Grandview Ave
Pawhuska, OK 74056

Dear Chief Standing Bear:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with The Osage Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of The Osage Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of The Osage Nation.
- Identify ways that OBGB can coordinate with and support The Osage Nation in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with The Osage Nation as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a large loop at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA
State Broadband
Office

March 10, 2023

Chief Lewis Johnson
The Seminole Nation of Oklahoma
PO Box 1498
Seminole, OK 74884-1498

Dear Chief Johnson:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with The Seminole Nation of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of The Seminole Nation of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of The Seminole Nation of Oklahoma.
- Identify ways that OBGB can coordinate with and support The Seminole Nation of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with The Seminole Nation of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a large, sweeping initial "M".

Mike Fina
Chair
Oklahoma Broadband Governing Board



March 10, 2023

Mekko Ryan Morrow
Thlopthlocco Tribal Town
PO Box 188
Okemah, OK 74859-0188

Dear Mekko Morrow:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Thlopthlocco Tribal Town. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Thlopthlocco Tribal Town is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Thlopthlocco Tribal Town.
- Identify ways that OBGB can coordinate with and support the Thlopthlocco Tribal Town in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Thlopthlocco Tribal Town as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA
State Broadband
Office

March 10, 2023

President Russell Martin
Tonkawa Tribe of Indians of Oklahoma
PO Box 70
Tonkawa, OK 74653-0070

Dear President Martin:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Tonkawa Tribe of Indians of Oklahoma. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Tonkawa Tribe of Indians of Oklahoma is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Tonkawa Tribe of Indians of Oklahoma.
- Identify ways that OBGB can coordinate with and support the Tonkawa Tribe of Indians of Oklahoma in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Tonkawa Tribe of Indians of Oklahoma as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina", written in a cursive style.

Mike Fina
Chair
Oklahoma Broadband Governing Board



OKLAHOMA

State Broadband
Office

July 20, 2023

Chief Joe Bunch
United Keetoowah Band of Cherokee Indians in OK
PO Box 746
Tahlequah, OK 74465-0746

Dear Chief Bunch:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Executive Director of the Oklahoma Broadband Office, I am reaching out to initiate a tribal consultation with the United Keetoowah Band of Cherokee Indians in OK. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

Oklahoma Broadband Office is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the United Keetoowah Band of Cherokee Indians in OK is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the United Keetoowah Band of Cherokee Indians in OK.
- Identify ways that OBGB can coordinate with and support the United Keetoowah Band of Cherokee Indians in OK in achieving connectivity goals.

We welcome you to provide a date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

We are looking forward to working with the United Keetoowah Band of Cherokee Indians in OK as we embark on this incredible journey together.

Respectfully,



Mike Sanders
Executive Director
Oklahoma Broadband Office
Mike.sanders@broadband.ok.gov

cc: MJ Barton
Tribal & Programs Outreach Manager
405-408-9890
mj.barton@broadband.ok.gov



March 10, 2023

President Terri Parton
Wichita and Affiliated Tribes
PO Box 729
Anadarko, OK 73005-0729

Dear President Parton:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Wichita and Affiliated Tribes. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Wichita and Affiliated Tribes is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Wichita and Affiliated Tribes.
- Identify ways that OBGB can coordinate with and support the Wichita and Affiliated Tribes in achieving connectivity goals.

We welcome you to provide a March, April, or May date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

I am including my personal mobile number should you have any questions; you may reach me at 405-609-9842.

We are looking forward to working with the Wichita and Affiliated Tribes as we embark on this incredible journey together.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fina". The signature is fluid and cursive, with a large loop at the end.

Mike Fina
Chair
Oklahoma Broadband Governing Board



July 20, 2023

Chief Billy Friend
Wyandotte Nation
PO Box 250
Wyandotte, OK 74370

Dear Chief Friend:

This year will mark the beginning of our country's largest infrastructure build in the past 50 years. Together, Tribal Nations and the State of Oklahoma will build more than \$1.5 Billion in broadband infrastructure. The federal programs backing these efforts are designed to enable Tribal Nations and the State to provide access to high-speed broadband to every citizen living within the State of Oklahoma.

As Chair of the Oklahoma Broadband Governing Board (OBGB), I am reaching out to initiate a tribal consultation with the Wyandotte Nation. This consultation will assist the OBGB in the development of the Broadband Action Plan for the State of Oklahoma, a requirement of the Broadband Equity Access and Deployment (BEAD) Act and the Digital Equity Act (DEA), both components of the Infrastructure Investments and Jobs Act (IIJA).

OBGB is the designated entity for both the BEAD and DEA funding to serve the State of Oklahoma. In this role, our agency is working to engage partners and communities across the state in developing a plan to guide our broadband and digital equity investments to ensure that everyone in Oklahoma is connected. In November of 2022, OBGB received planning grants under each program to undertake research, outreach, and engagement activities resulting in the submission of a draft plan for public comment on June 1, 2023, and a final plan to be submitted to the National Telecommunications and Information Administration (NTIA) by July 31, 2023.

The participation of the Wyandotte Nation is critical to ensure you have a voice in the funding process. OBGB, along with President Biden's Administration, understands the importance of tribal collaboration in this process. As this process progresses, Washington, D.C. will be watching Oklahoma closely, as we become one of the model states in tribal broadband expansion.

It is my honor to invite you, members of your Tribal Council, and/or any Tribal representatives that you may designate to participate in the Tribal Consultation to provide your advice and insights as we develop policy related to broadband deployment and digital inclusion across our state.

We would appreciate the opportunity to hold this consultation during the month of March, April, or May depending on your availability. In addition to Tribal Leaders and State broadband officials, we will include representatives from NTIA as well.

Topics that we would like to cover during the consultation include:

- Overview of the BEAD, DEA, and Tribal Broadband Connectivity Program.
- Share information about the State's plans for broadband deployment and digital equity.
- Understand the Tribe's perspective on infrastructure needs and barriers to connectivity.
- Updates on current projects and plans of the Wyandotte Nation.
- Identify ways that OBGB can coordinate with and support the Wyandotte Nation in achieving connectivity goals.

We welcome you to provide a date that would work best for the Tribe, as well as any additional topics for the agenda and the names and contact information for whoever will participate on behalf of the Tribe. We respectfully request your input regarding an in-person, virtual, or hybrid option and possible locations for the consultation.

We are looking forward to working with the Wyandotte Nation as we embark on this incredible journey together.

Respectfully,

Mike Sanders
Executive Director
Oklahoma Broadband Office

CC: MJ Barton
Tribal & Programs Outreach Manager
405-408-9890

Appendix C: Local Coordination Tracker

