

The State of Rhode Island

Rhode Island Commerce Corporation



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FAST & AFFORDABLE INTERNET FOR ALL

Broadband Equity, Access, and Deployment (BEAD) Program

Initial Proposal *Volume 2*

November 3, 2023

Preliminary Draft for Public Comment | Subject to Change

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Dear Fellow Rhode Islanders,

The Rhode Island Commerce Corporation (Corporation) is pleased to share Volume 2 of Rhode Island's Initial Proposal for the Broadband Equity, Access, and Deployment (BEAD) Program. Volume 2 articulates the Corporation's response to all requirements of the National Telecommunications and Information Administration's (NTIA) notice of funding opportunity not included in Volume 1 of the Initial Proposal.

The Corporation welcomes your input and comments – we invite all Rhode Islanders and other stakeholders to review this document and provide feedback during the public comment period, beginning November 3, 2023, and ending December 4, 2023. The Corporation will review and consider all feedback submitted via the comment form, available at <https://commerceRI.com/broadband>.

The Corporation created this document as part of its ConnectRI program, which is responsible for allocating federal broadband dollars from BEAD, the Digital Equity Act (DEA, which NTIA administers), and the Capital Projects Fund (CPF, which the Department of the Treasury administers). ConnectRI aims to achieve universal service and work toward digital equity, driven by the following principles (informed by the state's needs and federal guidance): expand fiber infrastructure in the state, eliminate cost as a barrier, and foster an inclusive digital advancement ecosystem.

Should you have any questions, please contact ConnectRI via email at broadband@commerceri.com (note that comments will not be accepted via email; all comments must be submitted via our online form). For more information about the Corporation and ConnectRI, please visit <https://commerceri.com/broadband>.

Sincerely,



Brian Thorn

Director of Broadband Strategy, Rhode Island Commerce Corporation

Definitions and Abbreviations

ACP	Affordable Connectivity Program
AIPC	Aquidneck Island Planning Commission
BABA	Build America, Buy America Act
BEAD	Broadband Equity, Access, And Deployment
BSL	Broadband Serviceable Location
CAIs	Community Anchor Institution
CPAU	Critical Project Area Unit
CPF	Capital Projects Fund
CRMC	Coastal Resources Management Council
CWA	Communication Workers of America
DBEs	Disadvantaged Business Enterprises
DEA	Digital Equity Act
DEDI	Division of Equity, Diversity & Inclusion
DSL	Digital Subscriber Line
EHCPLT	Extremely High Cost Per Location Threshold
EHP	Environmental and Historic Preservation
FCC	Federal Communications Commission
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
FTEs	Full Time Employees
FTTP	Fiber-to-the-premises
HFC	Hybrid Fiber-Coaxial

IBEW	International Brotherhood of Electrical Workers
IJA	Infrastructure Investment and Jobs Act
ISBA	Independent Small Business Enterprise
ISP	Internet Service Provider
LSA	Labor Surplus Area
MBE	Minority Businesses Enterprises
NDIA	National Digital Inclusion Alliance
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NIST	National Institute of Standards and Technology
NOAA	National Oceanic and Atmosphere Administration
NOFO	Notice of Funding Opportunity
NSPE	National Society of Professional Engineers
NTIA	National Telecommunications and Information Administration
OER	Office of Energy Resources
OJT	On the Job Training
OSHA	Occupational Safety and Health Administration
OSHEAN	Ocean State Higher Education Economic Development and Administrative Network
PA	Project Area
PAU	Project Area Unit
PE	Professional Engineer
RDOF	Rural Digital Opportunity Fund
RFP	Request for Proposal

RICR	Rhode Island Code of Regulations
Corporation	Rhode Island Commerce Corporation
RIDEM	Rhode Island Department of Environmental Management
RIDOL	Rhode Island Department of Labor
RIDOT	Rhode Island Department of Transportation
RIPTA	Rhode Island Public Transit Authority
SAMP	Shoreline Change Special Area Management Plan
SCRM	Supply Chain Risk Management
SHMP	State Hazard Management Plan
UST	United States Treasury
WBE	Women's Business Enterprises
WIOA	Workforce Innovation and Opportunity Act

2.1 Objectives (Requirement 1)

2.1.1 Long-Terms Objectives

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.

Broadband is essential infrastructure for the 21st century. It enables economic development, access to education and employment, healthcare, news and entertainment, and connection to family and friends. Broadband is necessary for meaningful participation in society. Yet high-quality broadband is not universally accessible in the State of Rhode Island. At a time when access to the internet is a necessity – for remote work, distance learning, telehealth, engagement with digital government, basic business operations, and so much more – this disparity creates a deep digital divide in Rhode Island. Until every Rhode Islander is connected to reliable, affordable high-speed broadband, the State will not reach its full potential for economic growth and universal prosperity.

The digital divide in Rhode Island is twofold:

1. There is not yet universal availability of reliable, high-quality broadband infrastructure, and
2. Not every individual or business has the capacity to effectively utilize broadband services available to them. Ubiquitous broadband access necessitates: the affordability of service; access to computers and other internet-enabled devices; and the acquisition of digital skills and technical support, which are essential for accessing a range of digital services, from basic tasks (e.g., email and web browsing) to more advanced applications (e.g., videoconferencing and telehealth).

To address the digital divide, U.S. Commerce Secretary Gina Raimondo announced in her remarks on June 30, 2023, in Newport, Rhode Island, that “Rhode Island will receive an investment of more than \$108 million dollars to ensure everyone in the

state has access and to address other issues, like affordability and digital inclusion.” This funding originates from the National Telecommunications and Information Administration’s (NTIA) Broadband Equity, Access, and Deployment (BEAD) Program.

The Rhode Island Commerce Corporation (Corporation) is charged with implementing the BEAD program within the State of Rhode Island and is committed to realizing the goals of universal access, affordability, and digital inclusion, as set forth by US Commerce. The Corporation has established the ConnectRI program to allocate federal broadband dollars from programs including BEAD, the Digital Equity Act (DEA, which NTIA administers), and the Capital Projects Fund (CPF, which the Department of the Treasury administers).

As adopted by the State’s Broadband Advisory Council (a body created by the Rhode Island General Assembly to advise the ConnectRI program) in December 2022, the ConnectRI program aims to “Leverage a best-in-class, resilient, sustainable, and scalable broadband infrastructure to propel the state’s 21st century economics, education, healthcare, civic and social engagement, and quality of life, by ensuring all Rhode Islanders have access to affordable, accessible high-speed internet in their homes, at their places of employment, and at public facilities by 2027.”

The ConnectRI program’s aims of affordable, universal, high-speed service and digital equity have been driven by principles informed by both the state’s needs and federal guidance on disbursement of broadband infrastructure and digital equity funds:

1. Expand fiber infrastructure in the state,
2. Eliminate cost as a barrier, and
3. Foster an inclusive digital advancement ecosystem by:
 - a. Cultivating strong implementation partners,
 - b. Meeting communities where they are,
 - c. Pacing and prioritizing actions for impact, and
 - d. Building and maintaining reliable data systems for decision making.

Accordingly, the State intends that all Rhode Island residents should have reliable, affordable access to broadband services with a minimum speed of 100 megabits-per-

second (Mbps) for downloads and 100 Mbps for uploads.¹ This aligns with the new baseline speed recognized by US Treasury (UST) and is higher than the baseline speed required by NTIA and the speed currently being discussed by the Federal Communications Commission (FCC) as the new broadband threshold. To effectively facilitate economic and social development for decades to come, the State further intends to support an infrastructure that can enable residents, in the near future, to access gigabit – or even multi-gigabit – broadband speeds, with symmetrical download and upload capabilities, regardless of their location.²

Building on the State’s overarching vision and goals for broadband, the Corporation has identified four objectives to ground this work and ensure these state and federal goals are met:

1. Maximize funding allocation, with a focus on universal service³ and affordability,
2. Cultivate strong implementation partnerships,
3. Promote community engagement, and
4. Drive economic and workforce development.

To evaluate success against these objectives, the Corporation will track key metrics tied to each goal including, but not limited to:

- Indicators of universal, affordable access to broadband ($\geq 100/20$ Mbps and $\geq 100/100$ Mbps (download/upload)) such as broadband penetration of households, cost of broadband access as a percentage of household income and small business monthly expenses, and ownership of devices such as laptops and tablets,

¹ However, for alignment with the BEAD NOFO, the State assesses availability and gaps against NTIA target of 100 Mbps for downloads and 20 Mbps for uploads (100/20).

² Given these goals, Rhode Island will prioritize increasing access to fiber optic networks through the ConnectRI program. These networks represent the highest quality known broadband infrastructure standard and offer an opportunity to “future-proof” deployed networks.

³ Universal service is the principle that all Rhode Islanders and all residential locations in Rhode Island should have access to high-speed broadband services.

- The number of partnerships in Rhode Island subgrantees' proposals,
- Inclusion of community stakeholders in digital equity initiatives, measured through the volume and diversity of stakeholders engaged and who provided commentary on the Corporation's digital equity plans,
- Metrics related to job creation, employment, and enrollment in workforce development programs.

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

2.2.1 Supporting Broadband Planning Processes

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.

At the time of submission for this Initial Proposal Volume 2, the Corporation has engaged with local governments across Rhode Island to understand previous and existing broadband planning efforts.⁴ The Corporation's stakeholder engagement with local governments targeted mayors, city managers, and supervisors at all municipalities within the state; the League of Cities and Towns supported the Corporation's engagement and outreach efforts, which included, but were not limited to, emails, phone calls, newsletters, dozens of public meetings and webinars, local events/engagements, and web-based stakeholder surveys, such as the Rhode Island Internet Connectivity Survey.

As a result of these efforts, the Corporation has identified the following previous and ongoing local broadband planning and implementation processes in Rhode Island:

- The Town of New Shoreham's Broadband BI, which constructed and implemented, through innovative public-private partnerships, Rhode Island's first municipally owned fiber-to-the-home network. All locations on Block Island were first available for service via Broadband BI in June 2023.
- The Aquidneck Island Planning Commission (AIPC) has also stated its interest in developing alternatives to current broadband networks on Aquidneck Island,

⁴ Please note that there are no regional (e.g., county) governments or planning bodies in Rhode Island.

which includes the municipalities Portsmouth, Middletown, and Newport. AIPC efforts are currently in a nascent stage.⁵

Please note that, as of the submission for this Initial Proposal Volume 2, the Corporation has sought input from the Narragansett Indian Tribe (Tribe), the only federally recognized tribe in Rhode Island. Attempts to contact the Tribe have thus far been unsuccessful. The Corporation remains committed to involving tribal stakeholders and communities in the BEAD planning process and will continue to attempt outreach.

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⁵ See: <https://aquidneckplanning.org/projects/island-gig-community-broadband-for-aquidneck-island/>

2.3 Local Coordination (Requirement 4)

2.3.1. Local Coordination To-Date

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.

Description of Coordination Conducted to Date

Ongoing and frequent involvement of stakeholders has played a key role in the development of this Initial Proposal and will continue to be critical for the success of Rhode Island's broadband deployment plans and the realization of the state's broadband and digital equity goals. The Corporation is committed to multiple and continuous methods of direct involvement with targeted stakeholder groups, in addition to extensive outreach initiatives targeting individual members of diverse communities.

The Corporation categorizes stakeholders into four groups: Public Service Stakeholders, Private Sector Stakeholders, Community-serving Stakeholders, and the Broader Public.

For each of these four categories, Rhode Island's stakeholder engagement model focuses on:

- Conducting meaningful engagement and outreach to a diverse set of stakeholders within these categories,
- Ensuring complete geographic coverage across Rhode Island,
- Deploying multiple awareness and participation strategies to keep stakeholders informed,
- Establishing clear procedures to ensure transparency, and
- Prioritizing engagement with unserved, underserved, and historically

underrepresented and marginalized groups/communities.⁶

To ensure the success of the Corporation’s local coordination efforts, the Corporation has hired a full-time outreach coordinator to provide the program management capability to enable ongoing stakeholder engagement.

Throughout its stakeholder engagement efforts, the Corporation has collaborated closely with the National Digital Inclusion Alliance (NDIA) to raise awareness throughout the state regarding BEAD, the Affordable Connectivity Program (ACP), and other broadband programs.

Outreach to Diverse Groups

Public Service Stakeholders – To date, the Corporation has collaborated with public service stakeholders including, but not limited to, town administrators, mayors, supervisors, town councils, state agency representatives, and school district IT personnel and superintendents. Engagement with these stakeholders – a group that encompasses more than 600 contacts – has included:

- Local government roundtable discussions,
- A booth and education session at the biannual League of Cities and Towns meeting,
- Updates at the monthly municipal leaders’ call hosted by the Governor’s office,
- State government consultations (this builds upon ongoing efforts to engage state agencies through the established Cross State Agency Broadband Working Group, convened for the first time in early 2021 – members include the Rhode Island Department of Education, the Rhode Island Department of Corrections, the Rhode Island Department of Health, the Rhode Island Emergency

⁶ The Corporation defines “historically underrepresented and marginalized groups/communities” in the same way that the DEA defines “covered population.” These groups/communities include low-income households, aging populations, incarcerated and formerly incarcerated individuals, veterans, people with disabilities, people with language barriers, racial and ethnic minorities, and rural inhabitants.

Management Agency, the Rhode Island Department of Transportation, the Rhode Island Department of Labor and Training, the Rhode Island Department of Environmental Management, the Office of the Governor, and leaders from the Town of Warren and the City of Providence as municipal representatives), and

- Virtual and in-person meetings.

As a result of these efforts, the Corporation certifies that it has reached out to all municipalities within the State of Rhode Island.

The Corporation also considers Tribal Governments to be Public Service Stakeholders. Please refer to section 2.3.2 of this report for further information detailing the Corporation's engagement with the Narragansett Indian Tribe, the only federally recognized tribe in Rhode Island.

Private Sector Stakeholders – To date, the Corporation has collaborated with Internet Service Providers (ISPs), local Rhode Island businesses, and labor organizations. Engagement with these stakeholders has included:

- Regular discussions, most of which occur monthly, with ISPs currently operating within the state and ISPs considering entry into the state,
- Informal feedback sessions with local Rhode Island businesses and business-serving organizations, and
- Interviews with representatives from educational/training agencies and labor organizations, such as the International Brotherhood of Electrical Workers (IBEW) and the Communication Workers of America (CWA).

Community-serving Stakeholders – To date, the Corporation has collaborated with non-profits, local libraries, religious organizations, neighborhood associations, and other community groups. This engagement has not only allowed Rhode Island to effectively receive input from a wide range of stakeholders (including, especially, underserved & unserved communities, historically underrepresented and marginalized

groups/communities, and communities that have difficulty accessing service), but has also helped to increase participation in the ACP by 13 percentage points over the eight months between March 2023 and October 2023. Engagement with these stakeholders has included:

- Community broadband events in partnership with community-serving stakeholders (e.g., ACP enrollment drives),
- Regular discussions and collaboration with leading community organizations (e.g., American Association of Retired Persons, United Way of Rhode Island),
- Bi-weekly meetings of the Corporation’s Digital Equity Working Group, which develops targeted strategies the state could take to address digital equity in Rhode Island, Community workshops (Working Group members include libraries, senior centers, public housing authorities, and leading community organizations),
- Roundtable discussions,
- Interviews with community leaders and key community organizations, and
- Virtual and in-person meetings.

Broader Public – To realize an inclusive and effective engagement model that enables participation from a diverse range of stakeholders, the Corporation has also engaged with the broader public, in addition to the other stakeholder groups. The Corporation’s engagement activities have included:

- Conduct statewide public broadband surveys,
- Community broadband events (in-person and virtual),
- Public meetings/discussions (including webinars), and
- Open office hours sessions (in-person and virtual).

Geographic Coverage

To date, the Corporation has completed 33 statewide events and activities to engage with stakeholder groups. Given that Rhode Island is only 48 miles North to South and

37 miles East to West and that most statewide activities occur virtually or in Providence (near the center of the state and at most a ~50-minute drive from the furthest parts of the state), the Corporation believes statewide events fulfill NTIA's geographic coverage requirements.

Nonetheless, the Corporation has also engaged in regional engagement efforts to exceed NTIA's geographic coverage requirements. In addition to the statewide events, the Corporation has hosted 48 regional events and activities. The Corporation has plans for further regional events and activities (in every county within the state) to further ensure that Rhode Islanders, regardless of where they live, can engage in BEAD planning activities.

The Corporation hosted in-person stakeholder events in centrally located, accessible facilities that are open to the public (e.g., libraries, community colleges). Events – like the Corporation's Internet for All: ConnectRI Broadband Summit (hosted in collaboration with NTIA at the Community College of Rhode Island, Newport Campus on June 1, 2023) – ensure that a comprehensive range of stakeholders in the state were granted the opportunity to actively participate in broadband deployment and planning discussions.

The Corporation continues to plan and host additional local and statewide events. The Corporation's next Digital Equity event will be on November 9, 2023, in Cranston, Rhode Island, an area with low ACP enrollment.

Multiple Awareness Mechanisms

The Corporation has used multiple mechanisms to promote broad awareness and participation from various stakeholder groups. Awareness mechanisms used to date include, but are not limited to:

- Social media posts,
- Posts on the Corporation's website,
- Radio advertisements (including radio advertisements in languages other than English),

- Local newspaper advertisements (including in the Providence Journal),
- In-person meetings/presentations,
- Virtual meetings/presentations,
- Emails and newsletters,
- Surveys, and
- Engagement with Community Anchor Institutions (CAIs) to promote and distribute information.

Transparency

In conducting local coordination and outreach activities, the Corporation has established and documented procedures to promote transparency. The Corporation makes information on planned broadband activities accessible to a diverse set of stakeholder groups via the following approaches:

- Posting publicly available information to websites with up-to-date information;
- Involving a diverse set of stakeholders in the planning, implementation and execution of coordination and outreach efforts and activities, and in-person meetings and mailings;
- Providing information in commonly used languages other than English to be accessible to a broad range of community members;
- Documenting (e.g., notes/minutes, recordings, photos, etc.) each event/activity and distributing such documentation to attendees and, when appropriate, to the public; and
- Maintaining an up-to-date schedule of activities and events, communicated online and via emails, calls and newsletters.

Underrepresented Engagement

The Corporation is committed to engaging with underrepresented groups and individuals, including unserved/underserved communities and historically underrepresented and marginalized communities. These groups/communities include

low-income households, aging populations, incarcerated and formerly incarcerated individuals, veterans, people with disabilities, people with language barriers, racial and ethnic minorities, and rural inhabitants.

To date, the Corporation's engagement activities, as described above and in the Local Engagement Tracker, have addressed low-income households, aging populations, people with language barriers, and racial and ethnic minorities. The Corporation has planned activities to engage with rural inhabitants, incarcerated and formerly incarcerated individuals, veterans, and people with disabilities.

Summary of Coordination Impact and Findings

The ongoing coordination efforts have helped the Corporation to better define unserved and underserved locations. As described in Volume 1 of the Initial Proposal, the Corporation found, through the ongoing coordination efforts, that Rhode Islanders from all parts of the state and from diverse groups lack access to affordable, high-speed broadband. In listening sessions, workshops, round table discussions, survey responses, speed test submissions, and other forums, Rhode Islanders consistently report they are unable to access broadband with download speeds greater than or equal to 100 Mbps and upload speeds greater than or equal to 20 Mbps. These reports stand in stark contrast with the National Broadband Map, which classifies ~99.3% of locations as served (the National Broadband Map classifies only 2,895 locations in Rhode Island, ~0.7% of all locations, as either underserved or unserved). To reflect the reality of broadband in Rhode Island, ensure the most accurate broadband data maps inform the ConnectRI program, and rectify the differences between the experiences of Rhode Islanders and the data within the National Broadband Map, the Corporation will engage in a pre-challenge, area reclassification process to create the Rhode Island Broadband Map. See section 1.2 of Volume 1 of the Initial Proposal for further information on the pre-challenge, area reclassification process.

The ongoing coordination efforts have also identified the preference of stakeholders that BEAD have a long-term impact on the broadband market in Rhode Island. To

articulate this point, stakeholders drew a comparison with the ACP; although ACP enrollment has proven beneficial for Rhode Islanders, ACP funds may not be renewed and are thus perceived to be short-term and potentially unsustainable. Stakeholders articulate that ACP's uncertain future makes it difficult for them to plan effectively and requested that BEAD programs in Rhode Island be implemented in a way that creates sustainability.

Additionally, the ongoing coordination efforts have identified unrelated, but adjacent efforts within the State's government (e.g., Department of Transportation infrastructure projects and Department of Environmental Management climate resilience efforts) that subgrantees may leverage to reduce costs, improve climate resilience, or expedite deployment.

Other findings from the Corporation's ongoing coordination efforts include:

- From the Corporation's Rhode Island Internet Connectivity Survey (April 2022 – May 2023, N = 743, conducted via the Corporation's website)
 - o About half of respondents report subscription to cable broadband, 19% report subscription to fiber, and 8% report subscription to fixed wireless.
 - o 56% of respondents note that they are satisfied with their current service.
 - o Only 19% of respondents said their services are affordable.
- Aging individuals find broadband services to be too expensive and are apprehensive about their abilities to use technology.
- Incarcerated individuals presently lack access to both modern technologies and internet; the Rhode Island Department of Corrections is aware of this challenge and is in the early stages of developing a plan to resolve this challenge. Formerly incarcerated individuals lack any dedicated programs, apart from those available to the broader public, from the State or Federal governments to increase access to broadband and the digital economy.
- While there are many broadband access programs to support Spanish-speakers, there are limited programs to support other individuals whose primary language is neither English nor Spanish.

Coordination with Final Proposal

Once NTIA has approved Rhode Island’s Initial Proposal, the Corporation will continue to engage with stakeholders via approaches similar to those described herein. The Corporation intends to continue to build upon its network of stakeholders after approval of the Initial Proposal as it executes the state-administered challenge process and the Subgrantee Selection Processes. The Corporation also plans to keep existing and new stakeholders abreast of its broadband efforts via regular newsletters, webinars, and engagement activities similar to those described herein.

2.3.1.1 Attachment: Local Coordination Tracker

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

The Corporation’s Local Coordination Tracker is available [here](#).

2.3.2. Tribal Consultation Progress

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.”

As of the submission for this Initial Proposal Volume 2, the Corporation has attempted to conduct the formal tribal consultation outreach process with the Narragansett Indian Tribe, the only federally recognized tribe in Rhode Island. The Corporation’s attempts to connect have thus far been unsuccessful. The Corporation remains committed to involving tribal stakeholders and communities in the BEAD planning process and will continue to attempt outreach.

The Corporation intends to align its engagement with the Narragansett Indian Tribe

with NTIA’s guidance, as outlined in the *SBO Engagement Guide – Tribal Governments*. Upon response from the Narragansett Indian Tribe, the Corporation plans to solicit the Tribe’s input based on this guidance to promote ongoing dialogue and better understand the Tribe’s priorities and needs.

It should be noted that the Narragansett Indian Tribe received a recent Tribal Broadband Grant Program award in 2022 from NTIA to support access on Tribal land. As this grant is administered by a sovereign nation and not the State of Rhode Island, the Corporation does not currently have visibility into the use of these funds. The Corporation will make every reasonable effort to ensure that BEAD funds are not duplicative to the Narragansett Indian Tribe’s Tribal Broadband Grant.

2.3.2.1 Optional Attachment: Tribal Consultant Process Evidence

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.

The Corporation will provide evidence of its consultation with federally recognized Tribes upon submission of this document to NTIA.

2.4 Deployment Subgrantee Selection (Requirement 8)

Deployment Projects Subgrantee Selection Process & Scoring Approach

The Corporation’s primary goals for the Deployment Subgrantee Procurement and Selection Process (the “Process”) are:

1. **Accessibility:** Expand fiber infrastructure in the state⁷
2. **Affordability:** Eliminate cost as a barrier
3. **Equity:** Foster an inclusive digital advancement ecosystem by meeting communities where they are, enabling participatory planning, cultivating strong implementation partners, and building and maintaining reliable data systems for decision making

This section describes how the Corporation proposes to select proposers to deploy broadband infrastructure in Rhode Island, and how funding will be awarded. To do so, the Corporation will follow the procurement methods set forth in the State Purchase Act, R.I. Gen. Laws § 37-2-1, et seq. (the “Act”). The section also includes details on the process, timeline, scoring and steps the Corporation will take to maximize the reach and impact of the BEAD funds throughout Rhode Island.

2.4.1 Subgrant Award Plan

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

Fair, Open and Competitive Process

Rhode Island has the benefit of an existing middle-mile broadband infrastructure

⁷ NTIA has interpreted the Infrastructure and Jobs Act of 2021 to require Eligible Entities to use BEAD funds, as much as possible, for fiber optic infrastructure (see BEAD NOFO, page 42). In addition to the legal requirement to use fiber optic infrastructure as much as possible, there are practical and technical reasons for preferencing fiber optic technology, including its future-proofed nature (i.e., its ability to meet broadband demand today and into the future), its reliability, and its lifespan (in comparison to the lifespan of other infrastructure types).

through investments by ISPs, The Ocean State Higher Education Economic Development Administrative Network (“OSHEAN”) and public entities including Rhode Island Public Transit Authority (RIPTA) and Rhode Island Department of Transportation (RIDOT). However, there remains in the state a digital divide. High quality broadband is not universally available in Rhode Island.

The Corporation seeks to use the unprecedented federal funding from NTIA and other sources to change this by investing in last-mile broadband infrastructure to bring high-speed, fiber-based service to expand and future-proof the fiber infrastructure in the state affordably and equitably.

To do this, the Corporation wants to foster an inclusive digital advancement ecosystem built on communities, participation, partnerships, and transparent and clear decision making. The Corporation seeks to achieve the best outcomes for unserved and underserved communities and is committed to awarding subgrants to deploy broadband through a fair, open, and competitive process that complies with the Act.

The principles of a fair, open, and competitive process consistent with the Act will allow the Corporation to incorporate key public policy goals into contracts with private partners while increasing choice and competition from service providers.

Open. The Corporation has developed a process that is open, inclusive, and transparent, which will likely be deployed through a Request for Proposals (“RFP”) process. The Deployment Subgrantee Procurement and Selection Process will ensure an open and competitive process and prevent favoritism and collusion. Any type of ISP currently licensed and any entity capable of receiving a license in the future to provide internet service in Rhode Island is welcome to apply including, but not limited to, for-profit entities, public utilities, public utility districts, local governments, non-profit organizations, co-operatives, and public-private partnerships. To encourage responses from a wide variety of potential proposers, the Corporation will make all materials, resources, and guidance available to all prospective proposers with adequate public notice via the Corporation’s website and other existing communications channels.

Fair. The Corporation seeks to level the playing field with inclusive gating criteria that are clear and not overly restrictive to ensure that entities of all types and sizes can participate. To safeguard against bias and collusion, the Corporation will ensure fairness with a review and scoring process that is transparent, objective, systematic and grounded in data, and consistent with Act. The Corporation will establish and clearly communicate evaluation criteria, which will be included in the RFP for the Process (see Section 2.4.2 for further details on scoring and evaluation criteria); and will ensure that they are applied consistently to all proposers.

To safeguard against conflicts of interest and arbitrary decision making, the Corporation will require evaluators to disclose any conflicts of interest, asking them to recuse themselves if needed. The Corporation will create a scoring committee to evaluate proposals and may engage objective third parties with specific expertise to support the scoring committee's work.

Competitive. The Deployment Subgrantee Procurement and Selection Process will be competitive. To ensure this, the Corporation will post the RFP on its web page and the web page of the Division of Purchasing and advertise the Deployment Subgrantee Procurement and Selection process in advance to ensure maximum visibility and time to respond. The Corporation will also make a public announcement of the RFP through its website as well as via widely circulated newspaper(s) and/or trade journal(s). The Corporation has designed the RFP for the Deployment Subgrantee Procurement and Selection Process with reasonable timelines to allow all proposers to construct quality proposals. Additionally, the Corporation will provide all proposers with the same information and has also selected and established secondary evaluation criteria so as not to favor or unfairly advantage one proposer over another.

Selection Objectives

The overall design of the process for Selection of Deployment Subgrantees will follow the following overarching objectives:

- **Fulfilling BEAD Funding Requirements.** Namely, establishing a fair, open, equitable, and competitive selection process to ensure that adequate

safeguards are in place to protect the integrity of the competition, including safeguards against collusion, bias, conflicts of interest, arbitrary decisions, and other factors that could undermine confidence in the process.

- **Adhering to BEAD Funding Priorities.** BEAD funding requires that unserved Broadband Serviceable Locations (BSLs) be prioritized first, followed by underserved BSLs second, and CAIs third. The Corporation will adhere to this required funding prioritization and is committed to ensuring that unserved and underserved BSLs will be allocated BEAD funding before CAIs or non-deployment projects.
- **Affordability Through Cost Savings.** The Corporation will seek to minimize the cost of design, construction, and operations to provide the most affordable service to all end users. To the extent that it is financially feasible, proposers will design, construct, and operate the network so as to optimize the cost of services and offset overall costs.
- **Speed To Deployment.** Proposers shall achieve the earliest date of operations that is consistent with reliable and high-quality design and construction processes.
- **Life-Cycle Asset Management.** Proposers shall optimize life cycle costs related to design, build, finance, operate and maintain functions over the term of the agreement.
- **Risk Balance Transfer.** Proposers shall optimize and transfer lifecycle risks so as to provide Corporation with budget and schedule certainty. This includes the transfer of certain design, construction, matching funding/financing, operations, maintenance, technology, and market risks to the subgrantee so as to provide Corporation with budget and schedule certainty.
- **Integrated Project.** Proposers shall ensure that the project is seamlessly integrated with current infrastructure and delivers public benefits to the community to the greatest extent feasible.

- **Maximize Competition.** The selection process shall attract best-in-class and experienced proposers to maximize competitive pressures and ensure that the Corporation receives the best value as a result of this unprecedented opportunity.
- **Build Inclusive Digital Equity and Environmental Sustainability.** The ConnectRI program shall implement a robust inclusivity program that addresses Federal and State requirements for local, small, minority, women and disadvantaged business enterprise participation while also enhancing environmental sustainability.

Selection Process

The Corporation will follow an RFP process for its Deployment Subgrantee Procurement and Selection Process for BEAD funding as part of a larger strategy for ensuring accessible, affordable, and equitable broadband for all Rhode Islanders. The Process will start after the approval of Volume 2 of Rhode Island’s Initial Proposal by NTIA and the completion of the BEAD Challenge process.

The Selection Process will adhere to the following steps:

1. Pre-RFP
2. First RFP Process (“Round One”)
3. Second RFP Process (“Round Two”)
4. Post-RFP Process

Pre-RFP

Finalized list of unserved locations and underserved locations. Once the BEAD Challenge process is complete, the Corporation will finalize the Rhode Island Broadband Map, which will include lists of unserved locations and underserved locations. The Corporation will make the Rhode Island Broadband Map and the lists of unserved and underserved locations available to the public. The

Corporation will also create a cost estimate for constructing facilities for the final list of unserved locations and underserved locations to determine the approximate amount of residual funding it expects to be available, if any, for funding eligible CAIs. If residual funding is available for eligible CAIs, the Corporation will include CAIs within the list of eligible locations.

Finalized list of Project Area Units (PAUs). Using the finalized list of unserved locations, underserved locations and eligible CAIs, the Corporation will establish and publicize PAUs, as described in Sections 2.4.6-7. Subgrantees will be required to provide service to all locations within a PAU. Proposers may submit proposals for one or more PAUs.

First RFP process

First RFP issued. The Corporation's first RFP will seek proposals for Priority Broadband Projects ("NTIA has determined that 'Priority Broadband Projects' are those that use end-to-end fiber-optic architecture"⁸) for unserved locations, underserved locations, and, if deemed feasible, eligible CAIs.

The Corporation will post the RFP on the Corporation's website and the Division of Purchasing website. The Corporation may also host a pre-bid conference or webinar shortly after the RFP is issued. The RFP will include a provision that permits proposers to submit written questions. The Corporation will post answers to the written questions before the deadline for submitting proposals, so all proposers have access to the same information prior to submitting their proposals.

Proposers will be required to include the following within their proposals:

⁸ BEAD NOFO, page 42.

- The areas which they propose to serve (see Section 2.4.6; proposers may submit proposals for one or more PAUs and must serve all locations within a proposed PAU),
- Technical and cost proposals,
- The amount of BEAD funds requested,
- Information on their financial, operational, managerial, and technical qualifications,
- All required certifications (see Sections 2.4.11-17), and
- All primary and secondary evaluation elements (see Section 2.4.2).

If proposers are proposing to serve CAIs, in addition to unserved and underserved locations, they will need to specify the CAIs they are proposing to serve. Proposers must specify separately the cost to serve CAIs, incremental to the cost to serve unserved and underserved locations, within each Project Area Unit. Proposals to serve CAIs will be evaluated after the Corporation, in its sole discretion, has determined that funding will be available for all unserved locations and underserved locations.

First RFP Submission Deadline. All proposals will be due 45 days after the RFP is released. The Corporation will first evaluate all proposals for completeness. Proposals that are deemed complete will be evaluated against the gating criteria and required minimum qualifications (see 2.4.11-17).

The Corporation will have 45 days to review complete and qualified proposals, after which provisional winning proposals will be selected. This will be done by scoring the proposals against the scoring rubric detailed in 2.4.2.

If conflicts exist between proposals, the Corporation will adhere to the deconfliction process as detailed in 2.4.6. The deconfliction period is 30 days. At the end of the deconfliction period, the Corporation will announce all provisional winning proposals for unserved locations and underserved locations.

While the Corporation intends to set the Extremely High Cost Per Location Threshold (EHCPLT) in the Second RFP Process as described below and in

Sections 2.4.9-10, the Corporation reserves the right to set an EHCPLT in the First RFP process to maximize the use of fiber to as many unserved and underserved locations as possible, while simultaneously ensuring universal access.

Second RFP process

Revise available PAUs and funding levels. At the conclusion of the first RFP process, the Corporation will revise the list of available PAUs, based on those that were not awarded in the first RFP process, and determine the amount of residual BEAD funding available. The Corporation will also review the list of available PAUs that did not receive bids; and may decide to further subdivide PAUs to break out undesirable locations, such as prohibitively expensive locations, to ensure that at least part of the PAU will be served via priority technologies (see Sections 2.4.6-7). The finalized list of remaining PAUs and their unserved locations, underserved locations, and, if deemed feasible, eligible CAIs will be released on or before the day the second RFP is issued.

Establish EHCPLT. At this time, the Corporation will also establish an EHCPLT. As described in Sections 2.4.9-10, the Corporation will perform a thorough optimization assessment and analysis to guarantee the EHCPLT will be set at the maximum possible value so as to ensure the objectives of (1) universal high-speed broadband service, (2) deploying as much fiber as possible, and (3) using the BEAD funding efficiently.

Second RFP issued. The Corporation will issue the Second RFP 105 days after the First RFP is issued. This RFP will include the EHCPLT and will be open to proposals for Priority Broadband Projects or Other Last-Mile Broadband Deployment Projects for unserved locations, underserved locations, and, if deemed feasible, eligible CAIs.

The Corporation will post the RFP on the Corporation's website and the website for the Division of Purchasing. The Corporation may also host a pre-bid conference or webinar shortly after RFP is issued. The RFP will include a

provision that permits potential Proposers to submit written questions. The Corporation will post answers to the written questions before the deadline for the submission of proposals, so that all Proposers have access to the same information before submitting their proposals.

Proposers will be required to include the following within their proposals:

- The areas which they propose to serve (see Section 2.4.6; proposers may submit proposals for one or more PAUs and must serve all locations within a proposed PAU),
- Technical and cost proposals,
- The amount of BEAD funds requested,
- Information on their financial, operational, managerial, and technical qualifications,
- All required certifications (see Sections 2.4.11-17), and
- All primary and secondary evaluation elements (see Section 2.4.2).

If proposers are proposing to serve CAIs, in addition to unserved and underserved locations, they will need to specify the CAIs they are proposing to serve. Proposers must specify separately the cost to serve CAIs, incremental to the cost to serve unserved and underserved locations, within each Project Area Unit. Proposals to serve CAIs will be evaluated after the Corporation, in its sole discretion, has determined that funding will be available for all unserved locations and underserved locations.

Second RFP Submission Deadline. All proposals will be due 45 days after the RFP is released. The Corporation will first evaluate all proposals for completeness. Proposals that are deemed complete will be evaluated against the gating criteria and required minimum qualifications (see 2.4.11-17).

The Corporation will have 45 days to review complete and qualified proposals, after which provisional winning proposals will be selected. This will be done by scoring the proposals against the scoring rubric detailed in 2.4.2.

After all available Priority Broadband Project proposals are resolved using this process, Other Last-Mile Broadband Deployment Projects⁹ proposals will similarly be ranked from highest to lowest score, with reliable service (cable/Hybrid Fiber-Coaxial [HFC] and licensed fixed wireless) proposals being placed ahead of other proposals (unlicensed fixed wireless, low Earth orbit satellite) as described in Sections 2.4.9-10).

If conflicts exist between proposals, the Corporation will adhere to the deconfliction process as detailed in 2.4.6. The deconfliction period is 30 days. At the end of the deconfliction period, the Corporation will announce all provisional winning proposals for unserved locations and underserved locations.

Post-RFP Process

At the conclusion of the second RFP process, the Corporation will identify any remaining PAUs with eligible unserved locations and/or underserved locations. The Corporation may negotiate directly with proposers that participated in the First RFP and/or the Second RFP to build out to these remaining PAUs. Such negotiations may provide proposers with inducements, which may include permission to use non-priority technologies and/or reducing/relaxing some requirements or utilizing other state funding to fulfill the match requirements on an exception basis.

Selection Process Timeline Summary

The proposed timeline for the Deployment Subgrantee Procurement and Selection Process, which will start after the State-administered Challenge Process finishes and

⁹ Other Last-Mile Broadband Deployment Projects are any projects that are not “Priority Broadband Projects.” “Priority Broadband Projects” are “those that use end-to-end fiber-optic architecture.” See BEAD NOFO, page 42.

conclude prior to the submission deadline of the BEAD Final Proposal, is reflected in the following table:

Phase	Start	Duration	End
Pre-RFP	Day 1		Day 15
Finalized list of unserved & underserved locations.	Day 1	15 days	Day 15
Finalized list of PAUs.	Day 1	15 days	Day 15
Draft and finalize RFP.	Day 1	15 days	Day 15
First RFP Process	Day 15		Day 105
First RFP issued	Day 15	45 days	Day 60
First RFP Submissions due	Day 60		
First RFP review and selection	Day 60	45 days	Day 105
Second RFP Process	Day 75		Day 210
Revise available PAUs and funding levels. ¹⁰	Day 75	45 days	Day 120
Establish EHCPLT. ¹¹	Day 75	45 days	Day 120
Second RFP issued.	Day 120	45 days	Day 165
Second RFP Submissions due	Day 165		
Second RFP review and selection	Day 165	45 days	Day 210
Post RFP Process	Day 210		Day 240

2.4.2 Project Prioritization and Scoring

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

Rhode Island has an absolute preference for fiber-to-the-premises (FTTP) as the optimal communications infrastructure.¹² The Corporation’s first RFP of the

¹⁰ This part of the Second RFP Process will partially run in parallel with the review & selection tasks of the First RFP.

¹¹ This part of the Second RFP Process will partially run in parallel with the review & selection tasks of the First RFP.

¹² In “determin[ing] that ‘Priority Broadband Projects’ are those that use end-to-end fiber-optic architecture,” NTIA has demonstrated a preference for the use of end-to-end fiber-optic infrastructure. See BEAD NOFO, Page 42.

Deployment Subgrantee Selection and Scoring Process will be for Priority Broadband Projects only. In the second round, the Corporation will establish an EHCPLT and will designate some areas as Other Last-Mile Broadband Deployment Projects and other alternative technologies will be explored (see Sections 2.4.9-10 for further details on the EHCPLT).

The Corporation's scoring rubric is consistent with NTIA's rules, which specify three primary criteria that together must account for 75 percent of scoring, as well as secondary criteria based on Rhode Island's own public policy priorities which must account for 25 percent of scoring. The total score is 100.

Primary Criteria for both Priority Broadband Projects and Other Last-Mile Broadband Deployment Projects (Total 75 points):

- Affordability (35 points)
- Minimal BEAD program outlay (30 points)
- Fair Labor Practices (10 points)

Secondary Criteria for Priority Broadband Projects (Total 25 points):

- Speed to Deployment (Required) (4 points)
- Equitable Workforce Development and Job Quality (6 points)
- Open Access (6 points)
- Local and Tribal Coordination (6 points)
- Network Resilience (3 points)

Secondary Criteria for Other Last-Mile Broadband Deployment Projects (Total 25 points):

- Speed to Deployment (Required) (4 points)
- Speed of Network and Other Capabilities (Required) (3 points)

- Equitable Workforce Development and Job Quality (6 points)¹³
- Open Access (6 points)
- Local and Tribal Coordination (6 points)

Primary Criteria

Affordability (35 points)

Proposers will be able to earn points in this section by showing a commitment in their pricing practices to serving all Rhode Islanders, regardless of income level. All comparable pricing offers will be compliant with requirements for capacity, availability, efficiency, scalability, flexibility, and manageability as defined in the Deployment Subgrantee Selection RFP.

For Priority Broadband Projects, the maximum scoring of 35 points will be awarded to the proposer(s) committed to providing the most affordable total monthly price to the customer for 1 Gbps/1 Gbps service in the proposed project area unit.¹⁴ The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA.

For Other Last-Mile Broadband Projects, the maximum scoring of 35 points will be awarded to the proposer(s) committed to providing the most affordable total monthly price to the customer for 100/20 Mbps service in the proposed project area. The Corporation will develop and publicize a complete scoring

¹³ Equitable Workforce Development and Job Quality will include additional points for ISBE participation, as required by 220-RICR-80-10-2. "ISBE" means a small business enterprise that is owned and controlled by one or more individuals who are women or minorities as defined by R.I. Gen. Laws § 37-14.1-3 or a small business enterprise that is owned and controlled by one or more individuals with disabilities as defined by R.I. Gen. Laws § 37-2.2-2. To be recognized under these Regulations as an ISBE, the business must be certified as either: a. an MBE by the ODEO; b. a WBE by the ODEO; or c. a Disability Business Enterprise by the Governor's Commission on Disabilities (see section 2.6.7 of 220-RICR-80-10-2, Regulations Governing Participation by Small Business Enterprises in State Purchase of Goods and Services and in Public Works Projects)

¹⁴ BEAD NOFO, Page 43.

mechanism prior to submitting a final version of this document to NTIA.

The Corporation will require proposers of both Priority Broadband Projects and Other Last-Mile Broadband Projects to adhere to the following requirements:

1. Commit to a pricing schedule for five (5) years, subject to inflation adjustments;
2. The service costs must be inclusive of all taxes, fees, and charges, with no additional non-recurring costs or fees to the consumer (i.e., no installation or equipment costs);
3. Provide typical latency measurements of no more than 100 milliseconds;
4. 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; and
5. In the event the proposer later offers a lower cost plan and/or a plan with higher speeds at the same price, it will permit subscribers that are subscribed to the service option to upgrade to the new offering at no additional cost.

All pricing will be reviewed in relation to the project's business case and financial analyses that substantiate the sustainability of the proposed project. As required by NTIA's Notice of Funding Opportunity (NOFO), this proforma or analyses should include at least three years of operating cost and cash flow projections post targeted completion of the project. The Corporation expects that the cash flow projections will include, at a minimum, capital and operating cost components and the revenue component, which will be reviewed for reasonableness.

Minimal BEAD Program Outlay (30 points)

For both Priority Broadband Projects and Other Last-Mile Broadband Projects, proposers will be able to earn points in this section by showing a commitment to

maximizing the effectiveness of the BEAD funding for all Rhode Islanders while also committing to the minimum 25% match required by BEAD in each project area.

The maximum scoring of 30 points will be awarded to proposers committed to the absolute lowest dollar value of BEAD Program outlay, as long as the BEAD outlay is not greater than 75% of the project cost. If two proposers ask for the same amount of BEAD Program outlay for the same project, the one with the superior project design and scalability would be awarded a higher score. The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA.

Following the selection of proposers and the execution of subawards, BEAD funding outlay will be done on a reimbursable basis per the deployment progress milestones achieved by the selected proposer. The Corporation anticipates that the subaward will require the subgrantee to provide proof of having spent 50% of its matching funds commitment on the Project prior to any distribution of BEAD funding.

Proposers for Priority Broadband Projects should understand that the cost is for connecting all eligible premises in the applicable project area. If given an award, subgrantees will be required to build the network all the way to the customer's premises (upon service activation); for example, there will be no additional funding for long driveways. Proposers will be responsible for the cost of all drops and customer premise telecommunications equipment¹⁵ as a condition of receiving funding and will not be allowed to charge residents of locations subsidized by BEAD funding for drops or customer premise equipment.

All proposers will need to certify upon submission of their proposal that they understand their cost commitment is binding, and that the Corporation will not award any additional funds for any other unexpected costs. Proposers will be encouraged to build in a contingency line item into their budget planning. They will be encouraged to account for future cost increases in supply and workforce, as no

¹⁵ Customer premise telecommunications equipment includes routers, modems, optical network terminals, access points, and, in the case of fixed-wireless access or low Earth orbit, home antennas. See BEAD NOFO, page 39.

additional funding will be given once an award is made.

Fair Labor Practices (10 points)

For both Priority Broadband Projects and Other Last-Mile Broadband Projects, proposers will be able to earn points in this section by having a demonstrated record of and plans to be in compliance with federal labor and employment laws. New entrants must be permitted to mitigate this fact by making specific, forward-looking commitments to strong labor and employment standards and protections.

For the following section, unless otherwise noted, the workforce described refers to the workforce constructing/deploying the high-speed internet infrastructure funded under BEAD. The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA. In general, responses will be scored on:

- Demonstrated history of strong practices and policies as to safety and training, job quality, accountability and subcontracting, local hire and targeted hire and ongoing network operations (post-deployment workforce);
- Demonstrated commitments to future compliance with federal fair labor practices as described by NTIA, including historical use of contracting and subcontracting arrangements including staffing plans and details on contractors and/or subcontractors; and
- Description of any violations of federal and state labor and employment laws for the preceding three years and a description of active litigation under federal and state labor and employment laws.

Secondary Criteria

Speed to Deployment (4 points)

For both Priority Broadband Projects and Other Last-Mile Broadband Projects, proposers will be able to earn points in this section by effectively demonstrating that

they will deploy the network within less than 48 months.

All BEAD funded projects must be completed within 48 months following execution of grant awards. Proposers will be awarded up to 4 points if they can effectively demonstrate that they will deploy the network within less than 48 months. The quickest deployment will get the highest score and other offers will be scored in relation to that. A proposer's score will depend on the thoroughness and detail they provide about the factors impacting their proposed timeline. The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA.

Timelines submitted should include a full range of necessary activities including, but not limited to design, permitting, construction, and activation. Timeline milestones will likely include 25 percent, 50 percent, 75 percent, and 100 percent completion. Timeline milestone commitments will be binding obligations in the grant agreements; and the Corporation will reserve the right to apply penalties up to and including default, cancellation of the grant and contract and all other penalties as permitted by law.

Speed of Network and Other Capabilities (Required) (Other Last-Mile Broadband Projects only) (3 points)

This criterion applies to Other Last-Mile Broadband Projects only. For this criterion, proposers will be able to earn points in this section by proposing solutions that consider the speeds, latency, and other technical capabilities of the technologies in the solutions proposed. Highest scores will be awarded to proposals that creatively consider the use of scalable technologies that are durable and affordable with longer capital asset cycles. The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA.

Network Resilience (Priority Broadband Projects only) (3 points)

This criterion applies to Priority Broadband Projects only. Prequalified proposers planning for network resilience to ensure reliability will receive maximum points. Features crucial for broadband networks include redundant systems, quick outage response, sufficient capacity, distributed assets, and robust security. The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA.

Equitable Workforce Development and Job Quality (6 points)

One of Rhode Island's stated broadband goals is economic and workforce development. Proposers who demonstrate their commitment to make the highest monetary investments to develop a skilled, diverse workforce to fill the necessary roles to meet the infrastructure buildout timelines submitted in proposal will receive maximum points. Other offers to make investments in Rhode Island's communities and workforce will be evaluated relative to the highest offer.

Proposers that demonstrate ISBE participation, as required by 220-RICR-80-10-2, will be awarded more points than proposers that do not demonstrate ISBE participation.

The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA.

Open Access (6 points)

The BEAD Program encourages states to adopt selection criteria promoting proposers' provision of wholesale open access to last-mile broadband service providers for the life of the subsidized networks, on fair, equal, and neutral terms to all potential retail providers. Proposers offering this provision will receive maximum points. The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA.

Local and Tribal Coordination (6 points)

Proposers with a track record of establishing successful and substantive long-term public-private partnerships with nonprofits and community organizations will receive points in this category. To demonstrate Local and Tribal Coordination, proposers are to submit documentation that demonstrates previous or ongoing substantive public-private partnerships with nonprofits, community organizations, local governments and/or tribal governments within the proposed project’s footprint. The Corporation will develop and publicize a complete scoring mechanism prior to submitting a final version of this document to NTIA.

2.4.2.1 Attachment: Scoring Rubric

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 Corporation’s Scoring Rubric for Priority Broadband and Other Last Mile Deployment Projects is available [here](#).

Round 1 scoring – Priority Broadband Projects

BEAD Criteria	Weighting
Primary Criteria	
Affordability.	35
Minimal BEAD Program Outlay.	30
Fair Labor Practices.	10
Sum of Primary Criteria	75
Secondary Criteria	
Speed to Deployment.	4
Network Resilience	3
Equitable Workforce Development and Job Quality.	6
Open Access	6

BEAD Criteria	Weighting
Local and Tribal Coordination	6
Sum of Secondary Criteria	25

Round 2 scoring – Priority Broadband Projects

BEAD Criteria	Weighting
Primary Criteria	
Affordability.	35
Minimal BEAD Program Outlay.	30
Fair Labor Practices.	10
Sum of Primary Criteria	75
Secondary Criteria	
Speed to Deployment.	4
Network Resilience	3
Equitable Workforce Development and Job Quality.	6
Open Access	6
Local and Tribal Coordination	6
Sum of Secondary Criteria	25

Round 2 scoring – Other Last-Mile Broadband Projects

BEAD Criteria	Weighting
Primary Criteria	
Affordability.	35
Minimal BEAD Program Outlay.	30
Fair Labor Practices.	10
Sum of Primary Criteria	75
Secondary Criteria	
Speed to Deployment.	4
Speed of Network and Other Capabilities	3

BEAD Criteria	Weighting
Equitable Workforce Development and Job Quality.	6
Open Access	6
Local and Tribal Coordination	6
Sum of Secondary Criteria	25

2.4.3 Coverage Prioritization

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 Corporation is committed to prioritizing Unserved Service Projects over Underserved Service Projects, and to ensuring that all Unserved Service Projects will receive coverage before Underserved Service Projects are addressed. The Corporation is also committed to ensuring that all Underserved Service Projects will receive coverage before eligible CAIs. As defined in the NOFO, an Unserved Service Project will include no less than 80 percent of broadband-serviceable locations that are classified as unserved locations.

Subgrantees who are awarded funding to build infrastructure in PAUs as a result of a successful proposal, are required, as outlined in section 2.4.1 and defined below in 2.4.6, to deploy to all eligible locations in the awarded PAU. NTIA is actively assessing whether subgrantees will also be required to deploy to any future BEAD-eligible locations in a PAU which are newly identified via the FCC’s DATA Act map and Broadband Data Collection process through the end of the BEAD subgrant performance term. All proposal plans and commitments such as for affordability, technology type, and performance level will apply to all current and future eligible locations within included PAs.

The Corporation has assessed project funding requirements for eligible locations based on data provided by NTIA. Based on this analysis, the Corporation anticipates having enough projected funding for 100% of unserved and underserved eligible

locations.

The Corporation will include a provision in the subaward which permits the Corporation to remove certain locations from the subaward if it is determined that there is unlikely to be sufficient funds to cover all unserved BSLs, underserved BSLs, and CAIs. To ensure compliance with the BEAD-required prioritization, the Corporation will prioritize first the unserved locations, then underserved locations, and then CAIs. For example, in the event that the Corporation determines, both via calculations and its review of proposals, there are likely to be insufficient BEAD funds available to reach all underserved locations and CAIs, the Corporation would have the authority to amend subawards to remove CAI locations to ensure all unserved and underserved locations are served; in the event that the Corporation determines, both via calculations and its review of proposals, there are insufficient BEAD funds available to reach all unserved locations, underserved locations and CAIs, the Corporation would have the authority to remove CAIs and, secondarily, underserved locations from subgrants to ensure all unserved locations are served. In such cases, the Corporation would adjust the amount of the subaward to account for the removal of certain locations, as described below in section 2.4.7.

2.4.4 Non-Deployment Projects

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 EHP and BABA Compliance Plans

The proposed subgrantee selection process is expected to demonstrate to subgrantees how to comply with all applicable Environmental and Historic Preservation (EHP) and Build America, Buy America Act (BABA) requirements for their

respective project or projects. Describe how the Eligible Entity will communicate EHP and BABA requirements to prospective subgrantees, and how EHP and BABA requirements will be incorporated into the subgrantee selection process.

The Corporation is committed to ensuring that all potential proposers understand that all projects to deploy network facilities must be compliant with EHP and BABA Requirements outlined in the BEAD NOFO. The Corporation and its consultants will undertake efforts to ensure subgrantees adhere to the requirements of Build America, Buy America Act (BABA) and any results of NTIA proposed waiver, the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) and National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.).

The Corporation will include the requirements for this section in its RFP. With specific reference to BABA compliance efforts, the Corporation and/or its consultants will ensure the following key points are highlighted to proposers:

- Requirements 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, proposers must comply with definitions included in Section 70912 of the Build America, Buy America Act (BABA), 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, proposers 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 Infrastructure Act expressly 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.

The Corporation recognizes the importance of compliance with BABA, and the need for ongoing monitoring of subgrantees to ensure compliance. The Corporation will ensure proposers are prepared to comply with BABA requirements once further guidance is finalized by NTIA. Documentation related to the requirements for this section will be collected and reviewed by qualified Corporation personnel.

Specific to NEPA and NHPA compliance efforts, the Corporation will ensure the following key points are highlighted to proposers:

- Proposers will be asked to describe how they will comply with applicable environmental and national historical preservation requirements.
- Proposers will be responsible for obtaining all necessary federal level, Rhode Island level, and local governmental permits and approvals necessary for the proposed work to be conducted based on the timeline for implementation for project areas.
- Projects and other eligible activities are expected to be designed so that they minimize the potential for adverse impacts on the environment.

The Corporation recognizes the importance of compliance with NEPA and NHPA noted above and the need for ongoing monitoring of subgrantees to ensure compliance. The Corporation will ensure preparedness for compliance requirements with NEPA and NHPA by:

- Reviewing available materials. The Corporation will require the proposer to review EHP and NEPA resources developed by NTIA and additional guidance in the BEAD NOFO, so the proposer understands the NEPA and NHPA review processes.
- Sourcing of EHP-focused staff or contractors. The Corporation will require the proposer to demonstrate the readiness of their broadband team to analyze potential environmental impacts. Additionally, the Corporation will require the

proposer to designate certain individuals to be specifically responsible for EHP activities; and to outline their responsibilities with regard to EHP and NEPA review. The Corporation will require the proposer to certify that if at any time during the project they do not have the capacity or expertise in-house, they will hire additional staff or contractor support to ensure their broadband team has the appropriate capacity and expertise to manage EHP activities.

- Outlining their approach for EHP activities. The Corporation will require the proposer to provide a narrative outlining their approach to EHP activities. These activities may include, but not be limited to coordinating with other state offices like the Department of Transportation & Development with experience administering federal grants to identify best practices for EHP activities; identifying subcontractors they may engage to support with potential environmental assessments; and sharing best practices for developing a project description that provides enough detail about the potential impacts to the environment to make a preliminary determination about the level of NEPA review required.

Because adhering to these requirements is necessary to participate in any BEAD funding grant rounds, engagement with stakeholders is critical for success. The Corporation will encourage selected proposers to engage with federal, state, and local stakeholders, including:

- Federal agencies. Federal land and resource managing agencies, including but not limited to the National Park Service, the U.S. Fish and Wildlife Service, the Bureau of Land Management, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the U.S. Coast Guard, the U.S. Forest Service, and others, to understand any restrictions or special conditions that may apply to infrastructure proposed on federal land, or that may impact federally managed resources such as wetlands, threatened or endangered species, navigable waterways and others.
- State and local agencies. State and local agencies that may have a role in EHP requirements, such as the State or Local Historic Preservation Office, as well as state or local agencies that may need to issue their own permits for any proposed projects.

Last-Mile Broadband Deployment Project Areas

2.4.6 Project Area Definition

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

The Corporation will define the **project area units (PAUs)**, for which it will solicit proposals from proposers. All PAUs will be designated as either unserved project area units or underserved project area units in accordance with NTIA guidelines.

- The Corporation will define PAUs following the completion of the State-Administered Challenge Process in accordance with NTIA’s guidance. The Corporation intends to use boundaries defined by the Census Bureau to delineate the boundaries of PAUs.
 - o In defining PAUs, the Corporation will seek to create projects that:
 - Will align with previous and ongoing local broadband planning and implementation processes in Rhode Island (see Section 2.2).
 - Will align with existing approaches taken by ISPs in the State,
 - Will be capitably and operationally efficient by clustering proximate unserved locations, underserved locations, and CAIs,
 - Will ease permitting barriers, and
 - Will be sufficiently large to attract large ISPs while being sufficiently small to permit the participation of small/new ISPs.
 - o As a result of these goals in creating PAUs, the Corporation– as of the publication of this Proposal– envisions using the Census-equivalent of municipal boundaries to delineate PAUs. This is subject to change following the Challenge Process.
 - Should the Corporation use the Census-equivalent of municipal boundaries to delineate PAUs, the Corporation anticipates it will subdivide some municipalities and aggregate other municipalities to support the ease of deployment/planning and provide for the

efficient use of capital.

- The set of PAUs and the BSLs therein will be published by the Corporation at or before the beginning of the Deployment Subgrantee Selection process.
- The PAUs established by the Corporation and the BSLs they contain are not up for negotiation; proposers may not submit alternative project area units.
- Proposers must include plans to build to 100% of the identified unserved or underserved BSLs and CAIs¹⁶ for each PAU listed in a proposal.

A **project area (PA)** is comprised of one or more PAUs (and the BSLs contained therein) that a particular proposer plans to serve, as stated in their proposal. PAs are to describe a contiguous set of PAUs or a set of closely proximate PAUs that the proposer plans to serve together using related infrastructure and operations. During the Deployment Subgrantee Selection Process proposers may specify more than one PA within their proposal.

- The Corporation reserves the right to grant proposers a subset of PAUs within their proposed PA(s), subject to the statements below regarding Crucial Project Area Units and the Deconfliction Process.

Crucial Project Area Units (CPAUs) are proposer-specified PAUs that are necessary to the proposer's PA, due to the PAU's position in the build plan, the economics of the PA, the proximity to pre-existing network assets, or other economic or operational factors. In their proposal, proposers are required to state their rationale for each PAU that they classify as a CPAU. Proposers are not permitted to unreasonably or excessively designate PAUs as CPAUs.

- The Corporation expects that proposers would prefer to build first to CPAUs

¹⁶ As mentioned, unserved locations, underserved locations, and CAIs will be prioritized for broadband service in that order. However, CAIs will be included in project area unit definitions to maximize build efficiency for the subgrantee.

within a given PA and second to other PAUs within the same PA.

Deconfliction Process: The Corporation will grant complete PAs to selected proposers as often as possible; in theory, the efficiencies of having network equipment across contiguous PAUs will result in cost savings, thereby improving a proposer’s score in the Deployment Subgrantee Selection process. However, recognizing proposers may have proposed overlapping PAs, the Corporation plans to adhere to the following deconflicting process:

1. Proposers must specify which PAUs are CPAUs. Proposers are not permitted to unreasonably or excessively designate PAUs as CPAUs.
2. The Corporation will first award any non-competitive PAUs, without consideration of the proposer’s proposed PAs.
3. The Corporation will next evaluate competitive PAUs, which have not been classified as CPAUs by any proposer. The Corporation will award these PAUs based on the Scoring Approach, without consideration of the proposer’s proposed PAs.
4. The Corporation will next evaluate competitive PAUs, which have been classified as CPAUs by one or more proposers. In this circumstance, the Corporation will select a winner based on:
 - a. The strength of the proposal for the individual PAU,
 - b. The strength of the proposal for the PA as a whole,¹⁷ and
 - c. The previously awarded PAUs (as a result of #2 and #3 above), so as to balance the Corporation’s desire to minimize costs and ensure universal coverage.
5. Proposers with CPAUs that are not won within an individual PA will have the option to withdraw their proposal for that PA or submit a revised proposal for that PA without the lost CPAU(s). Proposers that submit a revised proposal

¹⁷ When comparing PAs from two or more proposers, the Corporation will make its best effort to make a like-for-like comparison between proposed PAs (e.g., comparing costs per location passed/connected, selecting a subset of PAUs within a PA for comparison).

may do so only once in Round One of the Deployment Subgrantee Selection Process.

2.4.7 Addressing Unmet Needs

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 internet service providers willing to expand their existing or proposed service areas or other actions that the Eligible Entity will take to ensure universal coverage.

The Corporation anticipates that it will run two RFP rounds for the Deployment Subgrantee Selection Process. If a particular PAU does not receive any interest from proposers after the first round, the Corporation will take the following steps to ensure that all BSLs in Rhode Island are served following the second round:

- Upon completing the first round of the Deployment Subgrantee Selection Process, the Corporation will review the list of PAUs that did not receive bids. The Corporation may decide to further subdivide PAUs to break out undesirable locations, such as prohibitively expensive locations, to ensure that at least part of the PAU will be served via priority technologies.
- In addition to publishing the list of available PAUs, the Corporation will reach out directly to potential ISPs (e.g., incumbents, proposers, and nearby internet service providers in the area) to notify them of the outstanding opportunities and to solicit proposals for the remaining underserved and unserved locations.
- Before the second round of the Deployment Subgrantee Selection Process, the Corporation will set an EHCPLT (see Sections 2.4.9-10). Locations above this threshold may be served using non-priority technologies.

In the event there is no interest in a particular PAU after the Second Round of proposals, the Corporation may negotiate directly with selected proposers to build out to the remaining PAUs. Such negotiations may provide inducements, which may include permission to use non-priority technologies and/or reducing/relaxing some requirements.

2.4.8 Tribal Government Consent to Deployment

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

As of the submission for this Initial Proposal Volume 2, the Corporation has attempted to make contact with the Narragansett Indian Tribe, the only federally recognized tribe in Rhode Island. The Corporation's outreach attempts have thus far been unsuccessful. The Corporation remains committed to coordinating with tribal stakeholders and communities prior to deployments in their Tribal lands.

The Corporation notes that there are no unserved or underserved locations, according to the National Broadband Map, in Tribal Lands. However, it is possible that BEAD-eligible locations in Tribal Lands will be identified during the Challenge Process. In the event that BEAD-eligible locations fall within Tribal Lands, the Corporation will make every reasonable effort to (1) liaise with the Narragansett Indian Tribe to secure written consent for broadband deployment prior to the definition of Project Area Units and prior to the Deployment Subgrantee Selection Process begins, (2) consult with the Narragansett Indian Tribe on the selection of an internet service provider for those locations, and (3) collaborate with the Narragansett Indian Tribe to monitor the activities of subgrantees that win project area units on Tribal lands.

If the Corporation identifies BEAD-eligible locations within Tribal Lands, the Corporation will submit a formal Resolution of Consent to NTIA.

Extremely High Cost per Location Threshold

2.4.9 Extremely High Cost per Location Threshold Identification Process

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.

Per the BEAD NOFO guidance, the goal in establishing the Extremely High Cost Per Location Threshold is to “[maximize] the use of the best available technology” and deployment of end-to-end fiber projects wherever possible.¹⁸

The Corporation will wait until all proposals have been received during the first round of the Deployment Subgrantee Selection Process before establishing an EHCPLT. This will ensure that the State’s limited BEAD funds are used as efficiently as possible to achieve the State’s broadband objectives, including that of universal service. The Corporation may set an EHCPLT prior to or after awarding grants in the first round of the Deployment Subgrantee Selection Process. This approach will enable the Corporation to maximize the use of priority technologies at as many unserved and underserved as possible, while simultaneously ensuring universal access.

To establish the EHCPLT, the Corporation plans to estimate the cost to serve, on an incremental basis, the unserved and underserved locations not awarded after evaluation of proposals submitted in the first round of the Deployment Subgrantee Selection Process. The Corporation will perform a thorough optimization assessment and analysis to guarantee the EHCPLT will be set at the maximum possible value to ensure the objectives of (1) universal high-speed broadband service, (2) deploying as much fiber as possible, and (3) using the BEAD funding efficiently.

For this analysis, the Corporation will use NTIA’s Eligible Entity Planning Tool or other

¹⁸ BEAD NOFO, p. 31.

route-based cost optimization planning tool to determine the cost per location to pass the remaining premises with priority broadband. Depending on the amount of remaining funds and premises left over from the first round of funding, this analysis will help determine how many of the remaining locations can be covered at a reasonable cost by priority broadband technologies. This analysis will also consider the funding needed to serve locations above the EHCPLT with non-priority technologies such as fixed wireless or low Earth orbit (LEO) satellite.

Please note the Corporation does not plan to disclose an EHCPLT – or an expected or estimated EHCPLT – prior to the conclusion of the first round of proposals of the Deployment Subgrantee Selection Process both to both ensure a fair & equitable process and to maximize the likelihood that the State will achieve all its objectives.

2.4.10 Using EHCPLT to Maximize Broadband Reach

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

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

The Corporation is committed to satisfying the BEAD NOFO guidance of providing service with the most robust, affordable, and scalable technologies feasible under Rhode Island's unique circumstances. The State will seek to provide broadband access to as many unserved and underserved areas as possible with fiber prior to examining alternative technologies. The Corporation foresees a small number of projects that will be deemed unable to leverage Reliable Broadband Services below

the EHCPLT due to fiber being cost prohibitive. The Corporation anticipates such projects to be concentrated on off-grid or island locations, due to the State's highly coastal nature. In these cases, after ensuring all other service options have been depleted, the Corporation will seek proposals with alternative, non-priority deployment approaches/technologies to serve the remaining unserved BSLs. The Corporation envisions this to occur after the first round of proposals and after it establishes an EHCPLT.

As per the BEAD NOFO, a technology that does not meet the Reliable Broadband Service¹⁹ definition must still, at a minimum, be capable of providing service of 100/20 Mbps and latency less than or equal to 100 milliseconds at a lower cost. The Corporation intends to leave open the opportunity for competing proposals where this is the case and where no technology meeting the definition of Reliable Broadband Service would be deployable for an amount of subsidy that is less than the EHCPLT.

¹⁹ The term "Reliable Broadband Service" means broadband service is accessible to a location via: (i) fiber-optic technology; (ii) Cable Modem/ Hybrid fiber-coaxial technology; (iii) digital subscriber line (DSL) technology; or (iv) terrestrial fixed wireless technology utilizing entirely licensed spectrum or using a hybrid of licensed and unlicensed spectrum. See BEAD NOFO, page 15.

Deployment Subgrantee Qualifications

2.4.11 Financial Capability Evaluation

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.*
- b. *Detail how the Eligible Entity plans to establish a model letter of credit substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF).*
- c. *Detail how the Eligible Entity will require prospective subgrantees to submit audited financial statements.*
- d. *Detail how the Eligible Entity will require prospective subgrantees to submit business plans and related analyses that substantiate the sustainability of the proposed project.*

The Corporation will review the qualifications of proposers described in the RFP responses and will ensure that all proposers seeking to deploy network facilities meet the minimum qualifications for financial capability outlined in the BEAD NOFO. The Corporation will formulate specific intake questions and requirements during the Deployment Subgrantee Selection process to allow the Corporation to evaluate the

viability and compliance of a proposer's proposal.

Documentation related to the requirements for this section will be collected and reviewed by qualified personnel. The Corporation has hired consultants to ensure there is appropriate capacity and expertise to adequately review the documentation and provide a third-party perspective of the financial capability of the proposer.

The Corporation will communicate the requirements for this section to all potential proposers via the RFP process. The Corporation will include all requirements in the RFP instructions, in addition to the grant agreement terms and conditions, and monitoring requirements. Proposers will be required to submit their qualifications as part of their proposal in response to the Corporation's RFP.

a. Required Qualifications for Financial Obligations

The Financial Capability will be evaluated from the financial data submitted by Proposers in the RFP process. The Corporation will review typical financial health indicators such as audited financial statements including debt to equity/leverage, liquidity ratios, average revenues in the past three years, profit levels in the past three years. For mitigating project completion risks, the ability of the subgrantee to pay liquidated damages in the event of implementation delays would also be assessed.

The Corporation will require proposers to certify that they: 1. are qualified to meet the obligations associated with their Project; 2. will have available funds for all project costs that exceed the amount of the grant; and 3. will comply with all BEAD Program requirements, including service milestones. The certification will cover fund availability over the implementation period. Furthermore, before every grant disbursement request, the Corporation will evaluate the usage of the grants disbursed previously.

After proposers are selected, the Corporation will continuously monitor the project progress, funds usage and subgrantee's financial capability and will require each subgrantee to certify that it has and will continue to have sufficient financial

resources to cover its eligible costs for the Project until the Corporation authorizes additional disbursements.

b. Required Model Letter of Credit.

Under the NOFO, the Corporation will establish a model letter of credit similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF). The Corporation will require proposers to submit a letter from an eligible bank (see 47 C.F.R. § 54.804(c)(2)) in which the bank commits to issuing an irrevocable standby letter of credit to the proposer. The letter must include the dollar amount of the letter of credit and the issuing bank's agreement to adhere to The Corporation's model letter of credit terms and conditions. Before executing any subgrantee agreements, each proposer must obtain an irrevocable standby letter of credit, which The Corporation deems acceptable, and amounts to no less than 25 percent of the subaward amount. An opinion letter from its legal counsel must be included with the letter of credit stating, subject only to customary assumptions, limitations and qualifications, that in a proceeding under Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the "Bankruptcy Code"), the bankruptcy court would not treat the letter of credit or proceeds of the letter of credit as property of the subgrantee's bankruptcy estate under Section 541 of the Bankruptcy Code.

As articulated in NTIA's conditional waiver,²⁰ the Corporation will:

- Allow Credit Unions to Issue Letter of Credit. The NOFO requires subgrantees to obtain a letter of credit from a U.S. bank with a safety rating issued by Weiss of B- or better. The waiver permits proposers to fulfill the letter of credit requirement (or any alternative permitted under the waiver) utilizing any United States credit union that is insured by the National Credit Union Administration and that has a credit union safety rating issued by Weiss of B-

²⁰ See: <https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD-Letter-of-Credit-Waiver>

or better.

- Allow Use of Performance Bonds²¹. The waiver permits a proposer to provide a performance bond equal to 100% of the BEAD subaward amount in lieu of a letter of credit, provided that the bond is issued by a company holding a certificate of authority as an acceptable surety on federal bonds as identified in the Department of Treasury Circular 570.
- Allow to Reduce the Obligation Upon Completion of Milestones. The waiver allows the Corporation to reduce the amount of the letter of credit obligation below 25% over time or reduce the amount of the performance bond below 100% over time, upon a proposer fulfilling deployment milestones specified by the Corporation.
- Allow for an Alternative Initial Letter of Credit or Performance Bond Percentage. The NOFO requires that the initial amount of the letter of credit be 25% of the subaward (or the initial amount of the performance bond be 100% of the subaward under the option described above). The waiver allows the initial amount of the letter of credit or performance bond to be 10% of the subaward amount during the entire period of performance when the Corporation issues funding on a reimbursable basis consistent with Section IV.C.1.b of the NOFO and reimbursement is for periods of no more than six months each.

c. Required Audited Financial Statements

The Corporation will require each proposer to include in their proposal financial statements from the prior three (3) years that are audited by an independent certified public accountant. If the proposer has not been audited during the ordinary course of business, in lieu of submitting audited financial statements, it must submit unaudited financial statements from the prior fiscal year and certify that it will provide financial statements from the immediately prior fiscal year that are audited

²¹ The Rhode Island Little Miller Act, under Rhode Island General Laws 37-12, regulates payment and performance bonds for state-level public works and construction works.

by an independent certified public accountant prior to disbursement of the grant amount. The Corporation will not approve or disburse any grant for the deployment or upgrading of network facilities unless it is determined that the documents submitted demonstrate the proposer's financial capability with respect to the proposed project.

d. Required Business Plans and Financial Analysis

The Corporation will require that each proposer submit business plans and related analyses that substantiate the financial sustainability of the proposed project. The business plans may include, but not be limited to the following: Executive Summary; Project Description; Capital Costs; Operating and Maintenance Costs; Implementation Schedule; Financial Analysis justifying Proposed User Rates; Market Analysis; Competitive Analysis; Technical and Operational Plan; Risk Assessment; Legal and Regulatory Compliance; Management Team; Sustainability and Environmental Impact Review, etc.

The financial analysis should include at least three years of operating cost and cash flow projections post targeted completion of the project. The Management Team section will include pertinent resumes of key staff along with a matrix illustrating the skills and roles of lead staff with accompanying business plan deliverables.

The Corporation will assess and evaluate business plans and related analyses to ensure that the proposer's plan is technically feasible and financially viable, and the team has the appropriate capacity and expertise.

2.4.11.1 Optional Attachment: Draft Application Materials

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

Not applicable.

2.4.12 Managerial Capability Evaluation

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

The Corporation will review the qualifications of proposers through the RFP responses and will ensure that all proposers seeking to deploy network facilities meet the minimum qualifications for managerial capability outlined in the BEAD NOFO. The Corporation will formulate specific intake questions and requirements to allow the Corporation to evaluate the viability and compliance of a proposer's proposal.

Documentation related to the requirements for this section will be collected and reviewed by qualified personnel. The Corporation has hired consultants to ensure there is appropriate capacity and expertise to adequately review the documentation and provide a third-party perspective of the managerial capability of the proposer.

The Corporation will communicate the requirements for this section to all potential proposers via the RFP process. The Corporation will include all requirements in the RFP instructions, in addition to the grant agreement terms and conditions, and monitoring requirements. Proposers will be required to submit their qualifications as part of their proposal in response to the Corporation's RFP.

a. Resumes for Key Personnel Requirement

The key personnel provided by the subgrantee are expected to cover various areas such as design and construction management, financing, marketing, operations, maintenance, and general management. Their experience would be evaluated based on the relevance to their proposed roles in future projects. Some criteria for evaluating the personnel include:

- Total years of relevant experience and track record,
- Number of years of experience with the subgrantee,
- Experience with several projects similar in scope to that of the Project and details of such Projects,
- Existing capacity to undertake the Project, and
- Staffing plans and organizational charts to evaluate proposed capability.

b. Readiness to Manage Proposed Project Requirements

The Corporation will require all proposers to provide a narrative describing their readiness to manage their proposed project and ongoing services to be provided. This narrative should include at a minimum:

- *Proof of experience and track record.* Proposers must provide a key personnel narrative that describes relevant qualifications of key management personnel proposed to support this project. They will be required to submit detailed resumes along with a narrative explanation of the given role and responsibilities. The Corporation will be looking for: proof of experience undertaking projects of similar size and scope in general, and also specifically in Rhode Island and /or the selected Project Areas being bid for; Qualifications of key personnel in successfully managing engineering, design, construction, operations and maintenance of similar projects with proof of quality of services delivered to end users using reference checks; Experience and capacity in recruiting and training engineering, design and construction labor; and Experience including the presence of personnel, processes, and systems to respond to network performance impairments or outages.

- *Proof of existing capacity.* Proposers must describe their ability and experience to manage a broadband services network; and proof that they have the capacity to complete the project given its other projects and existing workload. Proposers will be asked to include recent and upcoming organizational changes and relevant organizational policies. The Corporation will evaluate the capacity of the subgrantee to manage the project in addition to their already existing project obligations.
- *Proof of current managerial capability.* Additionally, the Corporation will require a project organizational chart(s) and corporate relationships chart detailing all parents, subsidiaries, and affiliates. The Corporation will also require a roles/responsibility matrix illustrating how the skills of key staff align with Project deliverables; including upcoming organizational changes; and any relevant organizational policies. The Corporation will require a staffing plan for key personnel and will evaluate the number of persons available on the full-time and part-time basis to manage the project, their proposed commitment, and their number relative to the overall staff size of the proposed subgrantee.

2.4.13 Technical Capability Evaluation

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.*
- 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.

The Corporation will review the qualifications of proposers through the RFP responses and will ensure that all proposers seeking to deploy network facilities meet the minimum qualifications for technical capability outlined in the BEAD NOFO. The Corporation will formulate specific intake questions and requirements during all steps of the Deployment Subgrantee Selection process to allow the Corporation to evaluate the viability and compliance of a proposer.

Documentation related to the requirements for this section will be collected and reviewed by qualified personnel. The Corporation has hired consultants to ensure there is appropriate capacity and expertise to adequately review the documentation and provide a third-party perspective of the technical capability of the proposer.

As needed, the Corporation will develop predetermined standards of technical capabilities that correspond to industry standards, the BEAD NOFO and best practices. The Corporation may source the assistance of the Rhode Island Board of Registration for Professional Engineers, Rhode Island Society of Professional Engineers, and the National Society of Professional Engineers (NSPE) to ensure outreach methods and overview of requirements are adequately provided to all proposers.

a. Technical Qualifications for Implementation and Credentialed Workforce

The proposer will be evaluated on their project management and project financing experience, Design-Build experience, and broadband infrastructure operations and maintenance experience. The proposer will be required to provide a narrative explaining how their experience translates into value in the context of the Project and Project Area(s) being bid.

The Corporation will first seek a detailed organizational narrative explaining the

proposed structure of the proposer's team and the role of each key entity (both prime contractors and key subcontractors) including joint venture partners and consultants. The proposer's qualifications should provide details of similarly sized projects completed by the subgrantee in the last 5 to 10 years to demonstrate overall technical qualifications of the proposer. In describing similar projects completed by the subgrantee, the Corporation will consider any projects completed for the Corporation, the State of Rhode Island, any local government agency of Rhode Island or any projects completed for other public sector or private sector owners. If any projects have been implemented in other unserved and underserved areas of the country, those may be sought as well.

For a proposer who is a current broadband provider, the Corporation will require details on the products and services, operations, total subscriber count, type of services (business/residential), local presence in the region and other markets served including demonstrating any similar agreements with municipalities, electric utilities or other public-private partnerships.

For all the project phases including design, construction, and operations, the Corporation will require proposers to provide details on all the different types of technical staff required along with information on their training and credentials.

The Corporation will require proposers to certify that they are technically qualified to complete and operate the Project; and that they are capable of fulfilling funded activities in a competent manner, including that they will use an appropriately skilled and credentialed workforce.

In addition to the certification, proposers will be asked to provide additional documentation, including but not limited to:

- Documentation of current licensing with governing bodies to operate in Rhode Island;
- Attestation of current Rhode Island licensing for any engineers who certify network design, diagrams, project costs, etc.; and
- Demonstration of experience designing and delivering projects of similar size, complexity, and timeline.

b. Proposed Project Workplan Requirement

The Corporation will require proposers to submit a network design, diagram, project costs, build out timeline and milestones for project implementation; and a capital investment schedule evidencing that within four (4) years of the date on which they receive the subgrant: the complete build-out of the Project, and the initiation of service all certified by a professional engineer (PE), stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project.

Deployment subgrantee will be required to submit all documentation around their Project Management Plan. This will include, but not be limited to:

- *Project network and timeline.* Project's network design criteria, network design, architecture, protocols, diagram, and timeline including key milestones for project implementation, preparations, and risk factors. These key milestones include, but are not limited to contracting, engineering, pole licensing and make-ready permitting construction and connections. The proposer's plan to manage any time overruns and delays due to unforeseen factors will need to be identified.
- *Capital investment schedule.* The Corporation will also require the proposer to provide a capital investment schedule showing complete build-out and initiation of service within four (4) years of the date on which the proposer receives the subgrant. The schedule will detail various cost components such as design, engineering, procurement, mobilization, civil works, structural, mechanical, electrical works, testing, and commissioning.
- *Project costs.* The Corporation will also require the proposer to provide a project budget. The project budget must include Total Project Area Costs, Total Federal Grant Request, Total Cash Matching Funds, Total In-Kind Matching Funds, Total Matching Funds (Cash and In-Kind) and Total Matching Funds as a percentage of Total Project Costs.
- *Quality management.* Proposers will be required to describe how they intend to satisfy the Corporation's functional system needs as outlined in the grant disbursement documentation.

- *Operations and maintenance plan.* Proposers will be required to describe how the technology system is to be safely operated daily. The plan will contain a comprehensive description of the technology system’s resources, daily routine operational and maintenance procedures.
- *Procurement management.* The Corporation will also require the proposers to identify key procurement items (materials, equipment, or labor) that are on the critical path and may delay the project implementation.
- *Risk management.* Proposers will be required to identify all potential risks to their projects and how they intend to mitigate these risks.
- *Project health, safety, security, and environmental management.* In accordance with the laws, subgrantees would be required to comment on the health, safety, security, and environmental management practices in their project areas.

2.4.14 Compliance Evaluation

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

The Corporation will review the qualifications of proposers through the RFP responses and will ensure that all proposers seeking to deploy network facilities meet the minimum qualifications for compliance with applicable laws outlined in the

BEAD NOFO. The Corporation will formulate specific intake questions and requirements during the Deployment Subgrantee Selection process to allow the Corporation to evaluate the viability and compliance of a proposer's proposal.

Documentation related to the requirements for this section will be collected and reviewed by qualified personnel. The Corporation has hired consultants to ensure there is appropriate capacity and expertise to adequately review the documentation and provide a third-party perspective of the compliance with applicable laws of the proposer.

a. Compliance with Federal, State and Local Laws

The Corporation will require proposers to demonstrate that they are capable of carrying out funded activities in a competent manner in compliance with all applicable Federal, State and local laws. To do this, the Corporation will require proposers to provide a detailed history of compliance with all applicable federal, state, and local laws for previous broadband projects funded by federal and state programs, including disclosure of any default on any federal or state obligation associated with grants for broadband deployment. The Corporation will also require the proposer to provide evidence of current compliance policies and procedures for applicable federal, state, and local laws.

The Deployment Subgrantee proposal process will include an exhaustive list of areas where applicable laws need to be taken care of while implementing any BEAD funded project. The list will include but not be limited to:

- Potential environmental impacts, as required by the National Environmental Policy Act (NEPA) and the National Historic Preservation Act for compliance with applicable environmental and national historical preservation requirements.
- Usage of fiber-optic communications facilities, equipment and construction materials used in the project as per The Build America, Buy America Act (BABA).
- Restrictions on buying equipment from a specified country.

- Worker safety as per Occupational Safety and Health Administration (OSHA) regulations and/or other applicable safety regulations.
- Minimum wage, overtime, and non-discrimination as per Department of Labor and/or other applicable labor regulations.
- Construction contract/subcontract specific legislation including anti-indemnity statutes, prompt payment acts, lien statutes and retainage statutes.
- Local licensing and permitting requirements.
- Contracting with Minority Businesses Enterprises (MBEs) and Women's Business Enterprises (WBEs).
- Applicable Procurement rules and regulations.

The Corporation follows Rhode Island law pertaining to procurement methods, which are meant to encourage competitive proposals and ensure that the state does not unfairly advantage or disadvantage any vendor. The Corporation will work to incorporate existing federal, state, and local requirements and procedures; and to develop new policies, if and where needed. Additionally, the Corporation will review and implement guidance from NTIA's Subgrantee Selection Primer as needed.

b. Worker-led Health and Safety Committees

The Corporation will require proposers to permit workers to create worker-led health and safety committees that management will meet upon reasonable request. To meet this requirement, the Corporation will require proposers to provide evidence of policies and procedures that allow for the formation of worker-led health and safety committees that management will meet upon reasonable request. The Corporation will compare this information with best practices on working with labor groups, including those found in NTIA Internet For All: Workforce Planning Guide. Additionally, the Corporation will require certification of this compliance in quarterly fiscal and progress reports throughout the project.

The Corporation will also require proposers to submit documentation on any workplace safety violations resulting in a citation in the past 3 years; and access to workplace safety manuals that govern the proposer's work and work environment

during all stages of a project, namely engineering, design, permitting, environmental review, construction/splicing, testing, provisioning, and ongoing support of the broadband infrastructure.

2.4.15 Operational Capability Evaluation

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.*
- 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.*
- c. Detail how the Eligible Entity will require prospective subgrantees that have provided a voice and/or broadband service, to certify that it has timely filed Commission Form 477s and the Broadband DATA Act submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations.*
- d. Detail how the Eligible Entity will require prospective subgrantees that have operated only an electric transmission or distribution service, to submit qualified operating or financial reports, that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.*

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

The Corporation will review the qualifications of proposers through the RFP responses and will ensure that all proposers seeking to deploy network facilities meet the minimum qualifications for operational capability outlined in the BEAD NOFO. The Corporation will formulate specific intake questions and requirements during the Deployment Subgrantee Selection process to allow the Corporation to evaluate the viability and compliance of a proposer’s proposal.

Documentation related to the requirements for this section will be collected and reviewed by qualified personnel. The Corporation has hired consultants to ensure there is appropriate capacity and expertise to adequately review the documentation and provide a third-party perspective of the operational capability of the proposer.

a. Required Operational Qualifications

The Corporation will require proposers to certify that they possess the operational capability to qualify to complete and operate the project. To do this, during prequalification, the Corporation will require proposers to provide operational details including, but not limited to:

- Years providing internet service.
- Types of internet service provided.
- Current subscribers, including households, businesses, and community anchor institutions.
- Description of previous experience in operating and managing a utility-based infrastructure network including details of households and population served.
- Description of industry experience with broadband and telecommunications infrastructure operation and management.
- Experience of working with municipal agencies to develop affordable pricing or packages for key community stakeholders and populations.

- Details of key business entities/partners/subcontractors used in operating and management of the network.
- Completed federally funded deployment projects, including their sources of funding and timeframes for completion (or non-completion).
- Penalties paid by the proposer, any subsidiary or affiliate of the proposer or the holding company of the proposer relative to deployment projects.
- The number of times proposer has ever been a defendant in the State of Rhode Island for a criminal proceeding or civil litigation related to the deployment or operation of a broadband infrastructure; and
- Whether a proposer has ever defaulted on a federal or state obligation to deploy broadband infrastructure and if so, to provide details.

b. Required Number of Years in Operation

The Corporation will require the proposer to submit a certificate 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 proposal submission, or that it is a wholly owned subsidiary of such an entity. The certificate provided by the proposer must attest to and specify the number of years that proposer or its parent company has been operating. The Corporation will also seek documentation that evidences the total years of operational experience.

In the case of public-private partnerships, only one entity needs to provide this certification.

Entities with less than two years of operation can demonstrate operational capability based on the guidelines enumerated below in “Required Operational Capabilities of New Entrants.”

c. Required Compliance with FCC Form 477, Rules and Regulations

For proposers that have provided voice and/or broadband service, the Corporation will require the proposer to certify via a checkbox timely filing of Commission Form 477 and the Broadband DATA Act submission, if applicable during this timeframe.

The Corporation will also require the proposer to certify via a checkbox that it has complied with the Commission's rules and regulations. In case of pending or completed enforcement action, civil litigation, or other matter in which they failed to comply or were alleged to have failed to comply with the Commission's rules and regulations, the proposer should submit an explanation.

d. Required Operating and Financial Reports for Electric Transmission of Distribution Services

For proposers who have operated only an electric transmission or distribution service, the Corporation will require the proposers to submit a qualified operating and/or financial reports for the last three (3) years they have filed with the relevant financial institution for the relevant time period. Along with this, the Corporation will require the proposer to submit certification that the submission is a true and accurate copy of the reports provided to the relevant financial institution.

e. Required Operational Capabilities of New Entrants

For new entrants to the broadband market, the Corporation will require proposers to provide sufficient evidence to demonstrate that the newly formed entity has sufficient operational capabilities that it has developed or obtained through internal or external resources. This evidence may include, but not be limited to:

- Resumes from key personnel who will be part of the new entity;
- Project descriptions and narratives from contractors, subcontractors or other partners with relevant operational experience who will be part of the new entity;

- Experience of operating non-broadband networks and infrastructure;
- Availability of physical assets including office space, vehicles, equipment, etc. that will assist the proposer to provide services;
- Capabilities transferable from non-broadband networks to broadband networks; and
- Any other comparable data or evidence.

2.4.16 Ownership Qualification

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 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 Corporation will review the qualifications of proposers through the RFP responses and will ensure that all proposers seeking to deploy network facilities meet the minimum qualifications for ownership outlined in the BEAD NOFO. The Corporation will formulate specific intake questions and requirements during the Deployment Subgrantee Selection process to allow the Corporation to evaluate the viability and compliance of a proposer's proposal.

The Corporation will ensure that proposers seeking to deploy network facilities are thoroughly vetted and meet the minimum qualifications for providing information on ownership as outlined in the BEAD NOFO and consistent with the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7).

Documentation related to the requirements for this section will be collected and reviewed by qualified personnel. The Corporation has hired consultants to ensure there is appropriate capacity and expertise to adequately review the documentation and provide a third-party perspective of the ownership of the proposer.

a. Required Supporting Ownership Information

The Code of Federal Regulations regarding ownership information requires the following:

1. List the real party or parties in interest in the proposer or proposal, including a complete disclosure of the identity and relationship of those persons or entities directly or indirectly owning or controlling (or both) the proposer;
2. List the name, address, and citizenship of any party holding 10 percent or more of stock in the proposer, whether voting or nonvoting, common or preferred, including the specific amount of the interest or percentage held;
3. List, in the case of a limited partnership, the name, address and citizenship of each limited partner whose interest in the proposer is 10 percent or greater (as calculated according to the percentage of equity paid in or the percentage of distribution of profits and losses);
4. List, in the case of a general partnership, the name, address and citizenship of each partner, and the share or interest participation in the partnership;
5. List, in the case of a limited liability company, the name, address, and citizenship of each of its members whose interest in the proposer is 10 percent or greater;
6. List all parties holding indirect ownership interests in the proposer as determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain, that equals 10 percent or more of the proposer, except that if the ownership percentage for an interest in any link in the chain exceeds 50 percent or represents actual control, it shall be treated and reported as if it were a 100 percent interest; and
7. List any FCC-regulated entity or proposer for an FCC license, in which the proposer or any of the parties identified in paragraphs:
 - a. (1) through (a)(5) of this section, owns 10 percent or more of stock, whether voting or nonvoting, common or preferred. This list must

include a description of each such entity's principal business and a description of each such entity's relationship to the proposer (e.g. Company A owns 10 percent of Company B (the proposer) and 10 percent of Company C, then Companies A and C must be listed on Company B's proposal, where C is an FCC licensee and/or license proposer).

b. Designated entity status. In addition to the information required under paragraph (a) of this section, each proposer claiming eligibility for small business provisions, or a rural service provider bidding credit shall disclose the following:

- 1) On its proposal to participate in competitive bidding (i.e., short-form proposal (see 47 CFR 1.2105)):
 - i) List the names, addresses and citizenship of all officers, directors, affiliates and other controlling interests of the proposer, as described in § 1.2110, and, if a consortium of small businesses or consortium of very small businesses, the members of the conglomerate organization;
 - ii) List any FCC-regulated entity or proposer for an FCC license, in which any controlling interest of the proposer owns a 10% or greater interest or a total of 10% or more of any class of stock, warrants, options or debt securities. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the proposer;
 - iii) List all parties with which the proposer has entered into agreements or arrangements for the use of any of the spectrum capacity of any of the proposer's spectrum;
 - iv) List separately and in the aggregate the gross revenues, computed in accordance with §1.2110, for each of the following: The proposer, its affiliates, its controlling interests, and the affiliates of its controlling interests; and

- if a consortium of small businesses, the members comprising the consortium;
- v) If claiming eligibility for a rural service provider bidding credit, provide all information to demonstrate that the proposer meets the criteria for such credit as set forth in §1.2110(f)(4); and
 - vi) If applying as a consortium of designated entities, provide the information in paragraphs (b)(1)(I) through (v) of this section separately for each member of the consortium.
- 2) As an exhibit to its proposal for a license, authorization, assignment, or transfer of control:
- i) List the names, addresses, and citizenship of all officers, directors, and other controlling interests of the proposer, as described in §1.2110;
 - ii) List any FCC-regulated entity or proposer for an FCC license, in which any controlling interest of the proposer owns a 10 percent or greater interest or a total of 10 percent or more of any class of stock, warrants, options or debt securities. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the proposer;
 - iii) List and summarize all agreements or instruments (with appropriate references to specific provisions in the text of such agreements and instruments) that support the proposer's eligibility as a small business under the applicable designated entity provisions, including the establishment of de facto or de jure control. Such agreements and instruments include articles of incorporation and by-laws, partnership agreements, shareholder agreements, voting or other trust agreements, management agreements, franchise agreements, spectrum leasing arrangements, spectrum resale (including

- wholesale) arrangements, and any other relevant agreements (including initial proposals), oral or written;
- iv) List and summarize any investor protection agreements, including rights of first refusal, supermajority clauses, options, veto rights and rights to hire and fire employees and to appoint members to boards of directors or management committees;
 - v) List separately and in the aggregate the gross revenues, computed in accordance with §1.2110, for each of the following: the proposer, its affiliates, its controlling interests, and affiliates of its controlling interests; and if a consortium of small businesses, the members comprising the consortium;
 - vi) List and summarize, if seeking the exemption for rural telephone cooperatives pursuant to §1.2110, all documentation to establish eligibility pursuant to the factors listed under §1.2110(b)(4)(iii)(A).
 - vii) List and summarize any agreements in which the proposer has entered arrangements for the use of any of the spectrum capacity of the license that is the subject of the proposal; and
 - viii) If claiming eligibility for a rural service provider bidding credit, provide all information to demonstrate that the proposer meets the criteria for such credit as set forth in §1.2110(f)(4)

2.4.17 Public Funding Disclosure

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

The Corporation will review the qualifications of proposers through the RFP responses and will ensure that all proposers seeking to deploy network facilities meet the minimum qualifications for disclosure of publicly funded projects outlined in the BEAD NOFO. The Corporation will formulate specific intake questions and requirements during the Deployment Subgrantee Selection process to allow the Corporation to evaluate the viability and compliance of a proposer proposal.

Documentation related to the requirements for this section will be collected and reviewed by qualified personnel. The Corporation has hired consultants to ensure there is appropriate capacity and expertise to adequately review the documentation and provide a third-party perspective of the disclosure of publicly funded project of the proposer.

a. Disclosure of Existing and Future Publicly Funded Projects

The Corporation will require each proposer to disclose, for itself and for its affiliates

any proposal they have submitted or plan to submit, and every broadband deployment project they are undertaking or have committed to undertake at the time of the proposal using public funds. Public funds include, but are not limited to funds provided under: the Families First Coronavirus Response Act (Public Law 116- 127; 134 Stat. 178); the CARES Act (Public Law 116-136; 134 Stat. 281); the Consolidated Appropriations Act, 2021 (Public Law 116-260; 134 Stat. 1182); the American Rescue Plan of 2021 (Public Law 117-2; 135 Stat. 4); the Federal Universal Service Fund high-cost program (e.g., RDOF, CAF); or State or local universal service or broadband deployment funding program.

b. Detailed Information for Existing and Future Publicly Funded Projects

The Corporation will require the proposer to provide a list of publicly funded projects both under development as well as contemplated in the next three (3) years. As some of the data may be commercially sensitive, the Corporation will maintain strict confidentiality around such data. For each of these projects, the Corporation will require the proposer to disclose:

- The speed and latency of the broadband service to be provided (as measured and/or reported under the applicable rules);
- The geographic area to be covered;
- The number of unserved and underserved locations committed to serve (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage);
- The amount, types, and conditions associated with each public funding to be used;
- The cost of service to the consumer;
- The matching commitment, if any, provided and to be provided by the proposer or its affiliates;
- The ownership structure of the network;
- The support provided by the public agency in the project implementation; and
- The project partners, including Contractors, Suppliers, Consultants, and others.

2.5 Non-Deployment Subgrantee Selection (Requirement 9)

2.5.1 Fair, Open and Competitive Subgrantee Selection

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 Corporation intends to spend all its BEAD funds on broadband deployment activities. If remaining BEAD funds are available, the Corporation will determine how it will use those funds after the conclusion of the Deployment Subgrantee Selection Process.

The Corporation intends to procure most, if not all, of the non-deployment activities, unless they are related to an ongoing activity managed by the Corporation (e.g., community engagement to increase enrollment in ACP). However, the Corporation will retain the right to conduct activities itself after the Deployment Subgrantee Selection Process, should funds remain.

The Corporation intends to design and implement a fair, open, and competitive selection process for non-deployment activities in line with the BEAD NOFO and listed below:

- Direct subsidies for use toward broadband subscription, where the Corporation shows the subsidies will improve affordability for the end user population (and to supplement, but not to duplicate or supplant, the subsidies provided by the Affordable Connectivity Program).
- Implementation of the Corporation's digital equity plans (to supplement, but not to duplicate or supplant, Planning Grant funds received by the Corporation in connection with the Digital Equity Act of 2021). Such activities may include:

- Broadband sign-up assistance and programs that provide technology support,
 - Multi-lingual outreach to support adoption and digital literacy,
 - Digital navigators,
 - User training with respect to cybersecurity, privacy, and other digital safety matters,
 - Digital literacy/upskilling (from beginner-level to advanced),
 - Computer science, coding, and cybersecurity education programs,
 - Prisoner education to promote pre-release digital literacy, job skills, online job acquisition skills, and other digital literacy benefits, or
 - Remote learning or telehealth services/facilities.
- Costs associated with stakeholder engagement, including travel, capacity-building, or contract support.
 - Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described in Section V.H.2 of the NOFO.

The Corporation is committed to a fair, open, and competitive subgrantee selection process for non-deployment activities. The State of Rhode Island is well versed with effective and transparent utilization of federal grant and has resources to address matters related to collusion, bias, conflicts of interest, arbitrary decisions, and other factors that could undermine confidence in the process.

The following is a brief outline summary of the process that the Corporation envisions for the selection of non-deployment activities:

- *Pre-solicitation planning and development of Request for Proposals (RFP) package.* The Corporation will develop an RFP that could include at a minimum: (i) goals and objectives, (ii) list of eligible non-deployment activities, (iii) eligibility criteria, (iv) submission instructions and timeline, (v) evaluation factors/ scoring criteria, (vi) evaluation process, and (vii) federal and state award guidelines. As the RFP package is being developed, the Corporation will post the pre-launch of the RFP process for non-deployment activities on its website, as well as through newsletters, email distribution lists, or other

channels. Effort will be made to ensure that organizations of underrepresented communities and minorities-owned businesses are made aware of the grant opportunity.

- Launch of RFP. The RFP will be publicly posted on the Corporation’s website and the website for the Division of Purchasing. The Corporation will also make public announcements of the RFP through its website, email distribution lists, press releases, social media public postings, and channels of partners. The Corporation may also promote the RFP through newspaper or other advertisements.
- Evaluation and scoring. The Corporation will establish an evaluation committee, which will evaluate and score proposals, in accordance with evaluation factors or scoring criteria defined in the RFP. Members of the evaluation committee will be asked to certify, amongst other things, compliance with conflict-of-interest standards and confidentiality. Membership in the evaluation committee may be comprised of Corporation representatives, subject matter experts, community stakeholders or other relevant roles as determined by the Corporation.
- Selection and notice. The Corporation will ensure that the selection of non-deployment activities is transparent and will publish the list of awarded proposers on its website. An appeals process, consistent with state law, will be in place to allow proposers to protest an award decision.

2.5.2 Non-Deployment Initiatives

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.*

The Corporation is not yet able to determine if it will have sufficient funds to engage in non-deployment activities after completing deployment activities to achieve universal coverage. The Corporation's preliminary plan for non-deployment activities, should it have the ability to implement them, is described below.

Non-Deployment Initiative Selection Prioritization

The Corporation intends to prioritize the type of initiatives it will select based on the following considerations:

- Return on investment for the state and its residents: the initiative will have a generational impact on residents of the Commonwealth and will address the digital divide in a sustainable manner.
- Alignment to state economic development priorities: the non-deployment initiative addresses a component of the digital divide beyond access to broadband infrastructure that is supported by data from the forthcoming Rhode Island Digital Equity Plan as well as the state's Comprehensive Economic Development Strategy.
- Degree of innovation: the non-deployment initiative addresses an aspect of the digital divide without a current solution or supplements an existing solution in an innovative manner.
- Capacity and experience: organizations in the prospective pool of proposers generally have the experience and organizational capacity necessary to administer a potentially significant program.

Non-Deployment Programs Addressing Constituent Needs

Non-deployment initiatives will address a broad range of needs for both new and long-term broadband subscribers within Rhode Island, including:

- Training in digital skills, computer science, and cybersecurity;
- Access to remote/online services such as learning, telehealth, or reentry programming;
- Supplement activities identified in the upcoming Digital Equity Plan; or
- Direct subsidies for use toward broadband subscription to improve affordability for the end user population.

Stakeholder Input into Non-Deployment Initiative Selection

As described in Requirement 4 (Local Coordination) and Requirement 5 (Tribal Coordination), the Corporation is conducting extensive outreach with communities in public settings, community-based organizations, non-profits, ISPs, labor/workforce organizations, municipalities, Tribal governments, and other stakeholders to understand digital needs beyond the deployment of physical infrastructure.

The feedback gathered during stakeholder engagement activities will inform the selection or prioritization of non-deployment activities, in coordination with priorities identified in the forthcoming Digital Equity Plan. Additionally, the public comment process for this Initial Proposal will provide insight into the selection or prioritization of non-deployment activities.

Use of Funding for BEAD Equity, Access, and Deployment Goals

The Corporation will allocate BEAD Program funding for non-deployment activities in alignment with the BEAD NOFO — to cover unserved/underserved locations and to deploy symmetrical gigabit connections to CAIs — and the forthcoming Digital Equity Plan. During the implementation period, the Corporation will evaluate the performance of non-deployment funds considering a set of key performance

indicators that will be developed considering themes/criteria such as: access, availability, affordability, adoption, equity across geography, equity across population segments, performance versus peers, impact on economic activity, and other criteria as dictated by the Corporation.

2.5.3 Commitment to Broadband Deployment

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

The Corporation is focused on expanding end-to-end high-speed broadband through fiber to as many unserved/underserved locations within Rhode Island as possible. Once those locations are covered, the Corporation intends to focus on ensuring deployment of symmetric gigabit connections to CAIs.

In the event there are remaining BEAD funds, the Corporation will determine how it will use those funds after the conclusion of the Deployment Subgrantee Selection Process. This section identifies non-deployment activities the Corporation would intend to fund with remaining BEAD funds.

2.5.4 Non-Deployment Subgrantee Evaluation Process

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

The Corporation is not yet able to determine if it will have sufficient funds to engage in non-deployment activities after completing deployment activities to achieve universal coverage. If the Corporation had sufficient BEAD funds to implement non-deployment activities, it will ensure that proposers meet the three general qualifications below:

- Proposers are capable of carrying out activities in a competent manner in compliance with all applicable federal, Rhode Island, and local laws;

- Proposers have the financial and managerial capacity to meet the commitments and requirements of the BEAD Program and such other requirements as have been prescribed by the Assistant Secretary or the Corporation; and
- Proposers have the technical and operational capability to provide the services promised in the proposal.

In the context of the Non-Deployment Subgrantee Selection Process and for each of the three qualifications defined above, the Corporation intends to define the following parameters. Note that certain numerical thresholds for the minimum standards are indicative placeholders and are subject to change; thresholds will be determined within each specific RFP. The Corporation is committed to designing RFPs that provide access to for-profit, non-profit, and public entities, as well as public-private partnerships.

Compliance with all applicable federal, Rhode Island, and local laws	
Minimum standards to determine compliance	<ul style="list-style-type: none"> - Track record or experience of past performance (e.g., in the last [3] years) complying with all applicable federal, state, and local laws for a minimum of [2] grants/subgrants covering a similar scope of work or funding amount
Methods to determine a proposer meets the necessary standards	<ul style="list-style-type: none"> - Review of case studies or narrative grants/subgrants - Interview client references
Evidence the Corporation will accept	<ul style="list-style-type: none"> - Case study or narrative description of grants/subgrants covering a similar scope of work or funding amount - Client references

Financial and managerial capacity to meet the commitments	
Minimum standards to determine compliance	<p>Managerial:</p> <ul style="list-style-type: none"> - Years of experience of key personnel dedicated to management functions - Track record of successful completion (on time and on budget) of projects funded through federal funding programs <p>Financial:</p> <ul style="list-style-type: none"> - Submission of a detailed budget in compliance with the requirements set forth in the request for proposals - Proposer’s financial strength - Proposer’s business credit scores
Methods to determine a proposer meets the necessary standards	<ul style="list-style-type: none"> - Review of resumes of key staff and project qualifications - Interview client references - Review of assumptions and methodology to estimate the budget - Review of proposer’s audited financial statements and business credit scores
Evidence the Corporation will accept	<ul style="list-style-type: none"> - Resumes of key staff - Project qualifications - Client references - Estimated budget to deliver the scope of works - Audited financial statements - Corporate/business credit scores

Technical and operational capability to provide the services	
Minimum standards to determine compliance	<ul style="list-style-type: none"> - Years of experience of key personnel dedicated to the delivery of the scope of works - Track record of quality in the delivery of projects of similar size and scope and/or funded through federal funding programs - Understanding of scope of work to be provided
Methods to determine a proposer meets the necessary standards	<ul style="list-style-type: none"> - Review of resumes of key staff and project qualifications - Interview client references - Evaluation workplan and schedule of deliverables
Evidence the Corporation will accept	<ul style="list-style-type: none"> - Resumes of key staff - Project qualifications - Client references - Narrative description of workplan to deliver the project and schedule of deliverables

The Corporation reserves the right to adjust and/or be more or less specific with these parameters to tailor the Non-Deployment Subgrantee Selection Process after the conclusion of the Deployment Subgrantee Selection Process, when it will have more certainty about remaining BEAD funding. The Corporation will seek feedback and approval from NTIA prior to finalizing these adjustments.

2.6 Eligible Entity Implementation Activities (Requirement 10)

2.6.1 Implementation Activities

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

As discussed in Requirement 9 (Non-Deployment Subgrantee Selection), the Corporation may have funds remaining after awarding deployment grants for unserved and underserved areas. The Corporation expects to subgrant most types of non-deployment activities; however, it will implement the following activities directly:

- General administration of the grant;
- Implementation of the challenge process;
- Design and implementation of the subgrantee selection process;
- Ongoing monitoring, reporting, and performance management, including subgrantee compliance;
- Data collection, analysis, and mapping to the extent necessary beyond the planning fund allocation to facilitate the goals of the BEAD Program and digital equity plans;
- Stakeholder engagement, including activities such as publicizing the ACP and outreach to increase enrollment; and
- Activities related to the grant/ BEAD Program closeout process.

Programmatic administration is a necessary component of implementing the goals of the Corporation; while the Corporation will accept proposals from prospective subgrantees for deployment and non-deployment activities, it is imperative that the Corporation receive and utilize grant funds itself to manage the rest of the BEAD program.

2.7 Labor Standards and Protection (Requirement 11)

2.7.1 Required Compliance Materials for Selection

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

- a. Prospective subgrantees' record of past compliance with federal labor and employment laws, which:

 - i. Must address information on these entities' compliance with federal labor and employment laws on broadband deployment projects in the last three years;*
 - ii. Should include a certification from an Officer/Director-level employee (or equivalent) of the prospective subgrantee evidencing consistent past compliance with federal labor and employment laws by the subgrantee, as well as all contractors and subcontractors; and*
 - iii. Should include written confirmation that the prospective subgrantee discloses any instances in which it or its contractors or subcontractors have been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.**
- b. Prospective subgrantees' plans for ensuring compliance with federal labor and employment laws, which must address the following:

 - i. How the prospective subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:

 - 1. Information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network; and***

2. *How the subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.*

As part of the proposal submitted in the Subgrantee Selection Process, the Corporation will require the following information about records of past compliance with federal labor and employment laws from proposers, including its contractors and subcontractors:

- A certification from an Officer/Director-level employee (or equivalent) of the proposer, as well as its contractors and subcontractors, evidencing consistent past compliance with federal labor and employment laws for the preceding three years;
- Written disclosure from the proposer of 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;
- Narrative description of the proposer's historical use of contracting and subcontracting arrangements, including staffing plans, and
- At least one example of each contractor and subcontractor's compliance with federal labor and employment laws in the context of broadband deployment or a similar project in the last three years.

New entrants without a record of labor and employment law compliance will be allowed to mitigate this fact by making specific, forward-looking commitments to strong labor and employment standards and protections with respect to BEAD-funded projects.

As part of the proposal submitted in the Subgrantee Selection Process, the Corporation will require the following information about plans for ensuring compliance with federal labor and employment laws from proposers, including its contractors and subcontractors:

- 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 protocols, including but not limited to the use of safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects. These protocols should comply with the Occupational Safety and Health Act and the Fair Labor Standards Act.

The Corporation will give priority to fair labor practices when evaluating proposals. A proposer's record of compliance with federal labor and employment laws and their plans to comply with federal labor and employment laws will be included in the subgrantee selection process as a Primary Criterion (Fair Labor Practices) Specific details will be determined during the RFP.

2.7.2 Mandatory Labor and Employment Measures for Subgrantees

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.*

The Corporation will make mandatory for all subgrantees (including contractors and subcontractors) the following requirements and it will incorporate them into binding legal commitments in the subgrants:

- 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;
- Commitments to union neutrality;
- 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);
- Use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure); and
- Taking steps to prevent the misclassification of workers.

The listed labor standard and protection requirements will be evaluated in the subgrantee selection process under a Primary Criterion (Fair Labor Practices); thus, proposers (including contractors and subcontractors) will provide narrative and/or documentation that addresses these items in support of their proposal.

In addition to the proposal, for those requirements the Corporation will make mandatory and a binding legal commitment, Subgrantees (including contractors and subcontractors) will be required to provide annual certificates of compliance.

2.8 Workforce Readiness (Requirement 12)

The impact of BEAD funding on Rhode Island's labor market, more specifically in the state's telecommunications workforce, is expected to start in 2025-2026. The occupations likely to be needed for BEAD deployment are:

- Equipment operators (including construction equipment, crane, and industrial equipment operators)
- Fiber and wireless technicians (including industrial aerial installers and repairers, radio and base station installers / fiber technicians, splicing and wireless technicians and foremen supervisors)
- Inspectors (including health and safety and permit inspectors)
- Laborers and material movers
- Master and stage electricians
- Network architects and coordinators
- RF & field engineers (including telecommunications hardware designers)
- Software Engineers (including network architects and cybersecurity professionals)
- Structural engineers (including civil and structural engineers, tower engineering technicians)
- Surveyors and drafters (including construction drafters, land surveyors and map makers, and surveying and map technicians)
- Trenchers
- Trucking Crew (including supervisors of crane and trucking crews)

Also, several variables, including those listed below, impact the availability or access to qualified workforce:

- Type of role: manual (hands-on physical activity), specialized (knowledge of a particular field, technique, or skill), and supervisory (maintains daily operations and ensures progress of workflow processes).
- Degree of mobility across states. Higher mobility across states could be a threat because the United States is projected to experience a nationwide worker shortage.

- Ability for remote performance. Remote roles could have access to a greater hiring pool than primarily on-site roles.

The expected outcomes in Rhode Island’s labor market from implementing the BEAD Program are:

- The new demand for jobs anticipated to be created because of BEAD funding in Rhode Island would be around 300 Full Time Employees (FTEs), representing 5% of Rhode Island’s 5,400 FTEs cross-industry deficit (calculated as total workforce supply less total workforce demand).
- The cross-industry workforce deficit for all BEAD occupation groups was estimated at 10%. Trenchers, electricians, equipment operators, surveyors and drafters, and fiber/wireless technicians were the BEAD deployment groups with the greater workforce deficit, between 12-21% of the estimated supply of workforce for each individual occupation group.

The table below summarizes considerations to build out a workforce for those BEAD occupation groups with higher projected workforce deficit in Rhode Island.

BEAD Occupation Group	Projected Workforce Deficit (2026)	Type of Role	Considerations
Trenchers	-21.0%	Manual	<ul style="list-style-type: none"> - Roles required for the construction/delivery of broadband deployment. - Skills could be transferable from other
Equipment operators	-12.1%	Manual	

BEAD Occupation Group	Projected Workforce Deficit (2026)	Type of Role	Considerations
Fiber and wireless technicians	-11.9%	Mostly Manual	<p>industries due to low educational requirement; may require certifications or skills training.</p> <ul style="list-style-type: none"> - Partners to engage include workforce development institutions, apprenticeship programs, unions, Rhode Island Dept. of Labor (RIDOL) and other regional agencies, contractors/ employers.
Master and stage electricians	-17.8%	Specialized	<ul style="list-style-type: none"> - Roles required for the construction/ delivery of broadband deployment. - Skills are likely not transferable from other industries due to high educational requirements or on-the-job training. - Partners to engage include unions, workforce development institutions, apprenticeship programs, RIDOL and other regional agencies, contractors/ employers.

BEAD Occupation Group	Projected Workforce Deficit (2026)	Type of Role	Considerations
Surveyors and drafters	-12.0%	Specialized	<ul style="list-style-type: none"> - Roles required for the entire lifecycle of the BEAD Program (planning, design, construction, and maintenance). - Skills are likely not transferable from other industries due to high educational requirements or on-the-job training. - Partners to engage include workforce development institutions, apprenticeship programs, RIDOL and other regional agencies, contractors/employers.

2.8.1 Equitable Workforce Development and Job Quality

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 internet service 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.*

A highly skilled workforce is essential in ensuring job seekers have the tools and training they need to be competitive in the telecommunications labor market, while creating a strong talent pool for proposers. The Corporation will collaborate with community, labor, and educational institutions to create a skilled and diverse workforce.

The Corporation will define workforce requirements and guidance for subgrantees to ensure that the BEAD Program projects balance worker competence, training, and certifications with a competitive and attractive environment for workers in Rhode Island.

Ensuring a Highly Skilled Workforce

The Corporation's approach to ensuring the use of a highly skilled workforce will include the following activities:

- Promote tailored, flexible training opportunities. Flexible job training opportunities offered virtually and onsite can help further develop workers' skills and prepare them for gaining new skills that will help them succeed in today's dynamic workforce. The Rhode Island Department of Labor and Training offers resources to Rhode Islanders who are looking to develop their skills and find jobs such as job boards, free or reduced training programs and apprenticeships, and career advice. DLT's Real Jobs Rhode Island, a nationally

recognized industry-led workforce training initiative, provides placements, upskilling, and pipelines for future ventures. One partner within the Real Jobs RI initiative is Skills for Rhode Island's Future (SkillsRI), a nonprofit organization that manages Skills Academy, an online learning hub dedicated to helping Rhode Islanders gain access to meaningful job training programs.²² The DLT's job training and networking resources can remove barriers for workers looking to develop skills in broadband deployment and initiatives like Real Jobs RI can ensure cohesion between the ConnectRI workforce needs, training programs, potential workforce, and employers.

- Leverage federally funded career services. The Corporation, in collaboration with Rhode Island Department of Labor, will leverage Federal job readiness programs, such as Workforce Innovation and Opportunity Act (WIOA) Programs to incentivize workforce development. For instance, the On-the-Job Training (OJT) program administered by DLT lets employees hire and train skilled workers and get reimbursed for those costs.
- Promote the use of workforce with appropriate training, certifications, and credentials. The Office of Apprenticeship (Rhode Island Department of Labor and Training), through a partnership with Apprenticeship RI, a local non-profit organization, helps employers build new apprenticeship programs in a variety of industries including healthcare, information technology, marine trades, and manufacturing. There are more than 45 active registered apprenticeship programs in Rhode Island, including network engineer, network technician, and electrician. These accreditations represent a strong foundation for the Corporation and subgrantees to build on and develop apprenticeships for broadband deployment.

As part of the submission requirements in the Subgrantee Selection Process, the Corporation will require prospective/potential subgrantees to ensure project workforce has appropriate credentials, including pre-existing occupational training,

²² "Skills Academy," Skills for Rhode Island's Future, <https://academy.skillsforri.com/> (accessed Oct. 26, 2023)

certification, and licensure.

Partnerships to Meet Workforce Needs and Increase Job Opportunities

The Corporation's approach to developing and promoting sector-based partnerships to attract, train, retain, or transition to meet local workforce needs and increase high-quality job opportunities will include the following activities:

- Provide support (wrap-around) services. The Comprehensive Support Service Directory²³ is a tool sponsored by the Governor's Workforce Board (GWB) of Rhode Island and developed for the state employment agency and other workforce development network partners to locate and connect with support services and service providers throughout Rhode Island.²⁴ This source of information helps provide a complete picture of what career resources, assistance, and services are available in the region for jobseekers.
- Collaborate with unions and worker organizations. According to the Bureau of Labor Statistics, 16.1% of Rhode Island private and public sector workers were union members in 2022, compared with 10.1% of workers in the United States.²⁵ These data suggest that a portion of the broadband deployment workforce will be unionized. Through close collaboration with unions and other worker organizations, the Corporation will incorporate and be responsive to the needs of workers. The Corporation has had initial conversations with the International Brotherhood of Electrical Workers (IBEW) and the Communication Workers of America (CWA), unions that represent telecommunication workers,

²³ See: https://gwb.ri.gov/sites/g/files/xkgbur746/files/2022-08/RICSS_Desk_Guide_March2022_0.pdf

²⁴ See: "Comprehensive Support Service Directory," State of Rhode Island Governor's Workforce Board, 2020, <https://gwb.ri.gov/resources/partners/real-jobs-ri-partners> (accessed Oct. 26, 2023)

²⁵ US Bureau of Labor Statistics, "Members of union as a percent of employed in the United States and Rhode Island, 2012-22," US Bureau of Labor Statistics, https://www.bls.gov/regions/northeast/news-release/unionmembership_rhodeisland.htm (accessed Oct. 26, 2023)

to best support strong labor practices and high-quality job opportunities.

- Engage with state/regional workforce development initiatives. Real Jobs RI is a business-led workforce development initiative founded in 2015 and administered by Rhode Island Department of Labor. Real Jobs RI works with a network of employers, training providers, and community organizations to create partnerships that address industries' unique workforce challenges with a focus on employees' skills advancement and creating pipelines of talent for the future. Currently, Real Jobs RI reports more than 40 active partnerships, though none of those partnerships are within the telecommunications industry. The BEAD Funding would be an opportunity for the Corporation and subgrantees to more deeply collaborate with DLT within this industry.

Equitable On-ramps to Employment

The Corporation's approach to developing equitable on-ramps opportunities, maintain job quality, and engage with labor and community-based organizations to maintain worker voice throughout the planning and implementation process will include the following activity:

- Establish a workforce advisory group. The Corporation is developing a workforce advisory group, inclusive of labor unions such as IBEW, to discuss labor needs, gaps, training, and programs that can ameliorate them. With this advisory group, the Corporation shows a strong commitment to transparency, creating a feedback loop with partners and industry players and opportunities to improve local/regional coordination to further progress workforce development.

Efforts to Ensure Job Access for a Diverse Workforce

The Corporation's approach to ensuring that the job opportunities created by the BEAD program are available to a diverse pool of workers will include the following

activities:

- Promote pre-apprenticeship and registered apprenticeship programs for underrepresented Groups. The Corporation, in coordination/partnership with Rhode Island Department of Labor and Training and community organizations, will identify pre-apprenticeship as well as registered apprenticeship programs that offer industry-recognized credentials and can create a more accessible pathway into the telecommunications industry for underrepresented or historically excluded workers.
- Support diversity in hiring practices. The Corporation will encourage subgrantees (including its contractors and subcontractors) to document and track efforts to hire and retain workers from historically underserved groups, which could include women, people of color, veterans, and people with disabilities. The Corporation will encourage subgrantees to utilize state resources to access diverse talent and suppliers. For example, the SkillsRI's WorkABILITY initiative is a collaboration of Rhode Island state agencies and their service providers to identify new sources of underrepresented talent.²⁶ Additionally, SupplyRI is an initiative that connects local suppliers to large buyers; WBEs and MBEs are well represented in SupplyRI's database of over 2,000 suppliers. The Corporation could leverage the WorkABILITY and SupplyRI initiatives to help meet the subgrantees' workforce needs while also considering goals for diversity, equity, and inclusion in the workplace.
- Promote accountability and transparency. The Corporation will collect demographic data of the subgrantee workforce involved in the BEAD Program. The Corporation will publish annually aggregate workforce data, including information on underrepresented or historically excluded workers, which could include women, people of color, veterans, people with disabilities, formerly incarcerated persons, and other underserved groups.

²⁶ "SkillsRI WorkABILITY Initiative," Skills for Rhode Island's Future, <https://skillsforri.com/workability> (accessed Oct. 26, 2023)

- Advantage ISBE in Subgrantee Selection. Per Section 2.4.2, the Corporation will assign additional points to those organizations that include ISBE participation in their proposals.

2.8.2 Ensuring an Appropriately Skilled and Credentialed Workforce

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:*
- c. *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*
- d. *Information on the professional certifications and/or in-house training in place to ensure that deployment is done to a high standard.*

A skilled and qualified workforce is critical to the delivery of broadband infrastructure in Rhode Island that will achieve the BEAD's Program equity, access, and deployment goals.

To ensure that subgrantees and each of its contractors and subcontractors have the technical and operational capacity to carry out the subgrant, the Corporation will require proposers to have a plan for ensuring that the project workforce will be appropriately skilled and credentialed (including by the subgrantee and each of its contractors and subcontractors). The plan for a highly skilled and credentialed workforce will include documenting and certifying the following:

1. The ways in which the proposer 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;
2. 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;
3. Whether the workforce is unionized;
4. Whether the workforce will be directly employed or whether work will be performed by a subcontracted workforce; and
5. The entities that the proposer 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 will also need to provide with respect to the non-union workforce:

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

2. 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 standard consistent with the BEAD program's goals and in compliance with federal and state laws.

During the Subgrantee Selection Process, the Corporation will assess subgrantees' (including contractors and subcontractors) commitments with respect to advancing workforce development and job quality as a Secondary Criterion (Equitable Workforce Development and Job Quality).

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

2.9.1 Recruitment Plan for MBEs, WBEs and Labor Surplus Firms

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

The BEAD Program is an opportunity to increase the participation of minority-owned and women-owned businesses in the economic fabric of the state. The Corporation is committed to ensuring that Minority Business Enterprises (MBEs), Women’s Business Enterprises (WBEs), and Labor Surplus Area (LSA) firms are actively recruited, used, and retained where possible in broadband deployment and non-deployment activities as part of the BEAD Program.

The Corporation will encourage MBE/WBE participation in the solicitations associated to the BEAD Program, including via the Deployment Subgrantee Selection Process (see Section 2.4.2).

As of the time of this writing, the state’s list of certified MBE/WBE firms for participating in state and/or federally funded solicitations includes 475 businesses, including around 50 consulting engineering firms and a small amount of telecommunications/broadband engineering firms, IT infrastructure contractors, or suppliers of telecommunication products.²⁷ While the universe of certified MBE/WBEs is limited, the Corporation is eager to increase the pool of qualified minority businesses. The Corporation’s Minority Business Accelerator Initiative will assist WBE/MBE with registering with the state's Division of Equity, Diversity, and Inclusion.

²⁷ “MBE / WBE Directory Search,” State of Rhode Island Division of Equity, Diversity & Inclusion, <https://dedi.ri.gov/divisions-units/minority-business-enterprise-compliance-office/minority-business-enterprise-mbe> (accessed Oct. 26, 2023)

As detailed below, the Corporation will continue to plan and implement outreach events/activities targeted to MBE/WBE firms in the context of broadband deployment and the BEAD Program and will market the BEAD Program to the minority business community, emphasizing contracting and subcontracting opportunities.

The Division of Equity, Diversity & Inclusion (DEDI) at the RI Department of Administration manages state programs that facilitate equal opportunity employment opportunities and MBE/WBE participation in Rhode Island. DEDI oversees operations of the following functional offices:

- The State Equal Opportunity Office enforces the State's policy of equal opportunity and affirmative action, provides training and technical assistance to any company doing business in Rhode Island, and ensures non-discrimination and equal opportunity.
- The Human Resources Outreach & Diversity Office develops the State's business case for diversity and inclusion in employment and services.
- The Minority Business Enterprise Compliance Office promotes the development of certified MBEs, WBEs, and Disadvantaged Business Enterprises (DBEs) by facilitating their participation in Rhode Island's business and economic development opportunities, promotes the participation of certified businesses in public and private purchasing and contracting programs, and assists with new legislative and policy proposals that facilitate the involvement of minorities and women in the mainstream of the economy.
- The Supplier Diversity Office is responsible for increasing the number of businesses certified as an MBE, and to ensure that all businesses, including diverse and small businesses, have an opportunity to participate in the state's procurement activities.

The Corporation will undertake the following activities:

- Coordinate with state and local government departments/divisions of minority business support to expand BEAD-related opportunities for qualified MBEs and WBEs;

- Leverage the Corporation’s SupplyRI database to engage local diverse suppliers, ensure their awareness of the program, connect them to potential anchors, and support them—in collaboration with the APEX program—in being able to take on government contracts as sub-contractors;
- Use assistance from federal organizations such as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce and Department of Labor’s Women’s Bureau for creating broader opportunities for MBEs and WBEs;
- Based on existing databases/certification programs, such as Rhode Island’s Minority Business Compliance Office, proactively identify and engage MBE/WBE firms that are better suited to be involved in the BEAD Program, with a focus on deployment of broadband;
- Plan and implement outreach events/activities targeted to MBE/WBE firms in the context of broadband deployment and the BEAD Program, including but not limited to information sessions or webinars, networking events with proposers, targeted newsletters, and other events or activities;
- Market the BEAD Program to the minority business community, emphasizing contracting and subcontracting opportunities;
- Support those firms interested in the BEAD Program with their enrollment in the state MBE/WBE certification program;
- Require, in the Subgrantee Selection Process solicitation package, compliance with the state’s MBE/WBE participation target;
- Percent of the dollar value of the procurement or project; and
- Define in the Subgrantee Selection Process solicitation package a compliance monitoring and data tracking protocol for subgrantees to report on utilization of MBE/WBE firms, consistent with the guidelines from the Division of Equity, Diversity and Inclusion (DEDI).

Labor Surplus Areas (LSA)

The U.S. Department of Labor, Employment and Training Administration recently issued the LSA list for the fiscal year ending September 30, 2024. One jurisdiction in the State of Rhode Island is included in this list. The Corporation, through state agencies such as the Department of Labor and Training, will increase awareness of the contracting opportunities that the BEAD Program can provide to the local business community in Rhode Island's LSA. As part of the Subgrantee Selection Process, the Corporation will also include information pertaining to LSA location/s and firms for potential subgrantees.

2.9.2 Check Box: MBE/WBE/LSA Inclusion

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.*

Yes, the Corporation 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:

- Placing qualified small and minority businesses and women’s business enterprises on solicitation lists;
- Assuring that small and minority businesses, and women’s business enterprises are solicited whenever they are potential sources;
- 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;
- Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women’s business enterprises;
- 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
- Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

2.10 Cost and Barrier Reduction (Requirement 14)

2.10.1 Cost and Barrier Reduction Progress

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.*

The Corporation is committed to reducing costs and barriers to deployment of BEAD projects in the most efficient and cost-effective manner for an optimal use of the BEAD funding on broadband deployment projects. Rhode Island's approach to cost and barrier reduction, which is detailed below, will assist the Subgrantees with utilizing BEAD Program funds efficiently, while also reducing unnecessary delays.

Promoting the use of existing infrastructure

The Corporation is completing an asset inventory that identifies soft²⁸ and hard²⁹ assets in relation to deployment, adoption, affordability, access, and digital equity. In addition to the Digital Equity Ecosystem Mapping Tool, an online tool created by the Corporation to map out all CAI hard and soft assets, the Corporation is working with a GIS vendor and with ISPs to detail existing soft and hard broadband infrastructure available in the state. As of September 2023, the Corporation has identified over

²⁸ Soft assets that may be included in the Corporation's asset inventory include, but are not limited to, programs, activities, strategies, skills, and technical assistance.

²⁹ Hard assets that may be included in the Corporation's asset inventory include, but are not limited to, towers, buildings, utility poles, and public Wi-Fi access points.

2,000 miles of middle mile infrastructure in state, including:

- The Ocean State Higher Education Economic Development and Administrative Network (OSHEAN) has middle mile fiber available throughout the State, which internet service providers or nonprofits may lease to expand capacity for residential and business uses.
- The Rhode Island Department of Transportation (RIDOT), the Rhode Island Public Transit Authority (RIPTA), and other public entities also have available fiber which may be used to foster middle mile infrastructure solutions.
- Private Internet Service Providers own and operate middle mile fiber to support their various broadband and mobile services, which are not shared with the public for competitive and security reasons.

The depth of Rhode Island's existing infrastructure provides a substantial foundation to build from and to expand last-mile broadband access to unserved and underserved locations.

Finally, the Corporation intends to promote public-private partnerships that will encourage private ISPs to use their existing fiber assets to improve and extend broadband services.

Promoting and adopting dig-once policies

Rhode Island does not have a dig-once policy; however, the Corporation will promote coordination and work across public agencies and local jurisdictions in the state to align capital projects with broadband deployment where fiber infrastructure could be co-located in the right-of-way. For example, broadband providers will be required to coordinate with the Rhode Island Department of Transportation (RIDOT) to prioritize placing telecommunications infrastructure within the public right of way for transportation projects that are under planning or construction. The Corporation will establish regular meetings with the RIDOT and potentially local municipalities to increase coordination and communication for planned and ongoing construction projects that could include broadband infrastructure.

Streamlining permitting processes

The Corporation will continue to work with its local and state government partners to streamline the permitting process of broadband projects and reduce the administrative burden on cities and local authorities. From its \$5 million BEAD Planning Grant, the Corporation allocated \$1 million to support municipalities to permit deployments.

The Corporation will assemble a municipal help desk to assist Subgrantees with planning and review of permit applications from BEAD deployment projects.

Anticipated responsibilities and support from the municipal help desk are:

- Receive permitting packages/documentation.
- Identify items for technical review by the relevant departments (e.g., information technology, public safety, public works, facilities, transportation).
- Identify items for policy and legal review as needed and forward those to a team handling these issues.
- Manage review process and timeline.
- Coordinate communications with Subgrantees and broadband deployment partners.

Streamlining cost-effective access to poles, conduits, easements

As part of the asset inventory under development, the Corporation has compiled pole location data throughout the state. The Corporation will make this information available to proposers during the Subgrantee Selection Process so they can adequately price the cost of broadband deployment projects. The Corporation has existing relationships with electric utilities and other pole owners; as a result, the corporation will help subgrantees: (i) identify requirements to access/attach fiber to existing poles; (ii) develop a pole readiness checklist; and/or (iii) minimize the cost of pole attachments.

Conduits are more common in urban areas of the state, where public agencies, utilities, and telecommunication companies have built conduits for their own

purposes. The Corporation will work with these entities to identify existing infrastructure and determine whether, and under what conditions, subgrantees could use existing conduit in BEAD broadband deployments. The Corporation will make a reasonable effort to help subgrantees minimize the costs associated with access to these conduits.

Streamlining rights of way, including the imposition of reasonable access requirements

The Corporation recognizes that streamlining rights of way and access requirements is crucial for fast and cost-effective deployment of broadband infrastructure. Subgrantees may interact with several stakeholders such as RIDOT, local municipalities, the Division of Public Utilities, private utility providers, or private landowners when deploying last-mile broadband infrastructure.

Prior to the beginning of the Subgrantee Selection Process, the Corporation will identify significant stakeholders for right of way and access and will document permitting or access requirements to build broadband infrastructure. This information will be included in the grant solicitation package for potential subgrantees.

Upon award of BEAD funding, the Corporation will work closely with subgrantees and their counterparts to track progress of the right of way and access permitting process.

Mitigating supply chain disruptions

An increase of broadband deployment in the U.S., driven by both federal funding and private investment, may increase competition for required equipment and materials, placing more pressure on prices and the supply chain. Rhode Island may be affected by obstacles regarding supply chain disruptions, which can delay materials delivery and broadband deployment project timelines while increasing costs. The Corporation

is preparing for many materials to be affected by supply chain challenges and price increases, such as fiber optic cable, switches, and connectors.

The Corporation plans to address these obstacles through the Corporation's SupplyRI program³⁰, which connects local suppliers with anchor institutions requiring large purchases. By leveraging the subset of SupplyRI suppliers who sell required broadband cable, fixtures, etc., the State can decrease supply chain disruption and ensure adherence to the Buy America provisions of the BEAD NOFO.

To support subgrantees in meeting deployment timelines following the selection phase, the Corporation will also ensure an open communication channel with subgrantees to monitor supply chain challenges as projects progress and support mitigation of unexpected delays.

Subgrantee Selection Process Design

The Corporation also intends to use the design of the Deployment Subgrantee Selection Process to lower upfront capital costs. As a primary selection criterion is BEAD program outlays, proposers are incentivized to keep costs to a minimum and to provide as high a match as possible.

³⁰ SupplyRI helps connect local suppliers to large Rhode Island businesses (anchors) through an online database of pre-screened suppliers, technical/business assistance, training resources, capital access programs, such as the Commerce Corporation's Small Business Assistance Program, and networking events. SupplyRI connects local suppliers with large business institutions and guides them to better understand their purchasing/procurement processes and needs.

2.11 Climate Assessment (Requirement 15)

2.11.1 Climate Threat Assessment and Mitigation Methods

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.*

Rhode Island's topography and changing climate pose potential obstacles for broadband deployment and resilience. Due to its coastal nature, Rhode Island is particularly susceptible to coastal and inland flooding, erosion, rising sea level, and natural disasters such as hurricanes and other severe storms; each of these hazards are challenges that require mitigation to ensure the federal and state investment in broadband infrastructure is long-lasting.

Drawing on the work of Rhode Island’s climate action plan, the “Resilient Rhody” strategy (last updated in 2021) and the 2019 State Hazard Management Plan (SHMP), the Corporation identified the most pressing climate change risks for broadband infrastructure. These reports also highlight the ongoing initiatives the State of Rhode Island has prioritized to address climate change-induced challenges and emergencies.

I. Vulnerable Geographic Areas

Coastal areas are likely to be subject to elevated threats of flooding, tropical storm damage, land erosion, and sea level rise. The 21 Rhode Island municipalities with coastal lands are:

Barrington	Middletown	South Kingstown
Bristol	Narragansett	Tiverton
Charlestown	New Shoreham	Warren
Cranston	Newport	Warwick
East Greenwich	North Kingstown	Westerly
East Providence	Pawtucket	West Warwick
Jamestown	Portsmouth	
Little Compton	Providence	

Flood risks and associated effects (including land erosion) will also affect communities situated along rivers. While all Rhode Island municipalities include some access to rivers, ponds and other bodies of water, areas particularly prone to river flooding and associated effects are:

River ³¹	Municipalities
Pawtuxet River	Coventry, Warwick, West Warwick, Cranston

³¹ Rhode Island Emergency Management Agency, “3.16 Flood,” *State Hazard Mitigation Plan*. Rhode Island Emergency Management Agency, 2019. Page 3-117. <https://riema.ri.gov/planning-mitigation/hazard-mitigation/hazard-mitigation-planning> (accessed October 12, 2023).

River ³¹	Municipalities
Pawcatuck River	Westerly, Charlestown
Woonsquatucket River	Smithfield, Providence
Blackstone River	Woonsocket, Cumberland, Lincoln, Central Falls, Pawtucket

Additionally, all Rhode Island municipalities may be impacted by climate events such as rising temperatures, heavy tropical and winter storms, and flooding from heavy rainfall events.

II. Initial Hazard Screening Process

The Corporation will conduct an initial hazard assessment for municipalities classified as Vulnerable Geographic Areas, in consultation with resources from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmosphere Administration (NOAA), the National Weather Service (NWS), and the Rhode Island Coastal Resources Management Council (CRMC). This screening is intended to identify areas where projected changes in sea levels, weather patterns, landscape changes, and population will affect broadband infrastructure and broadband infrastructure deployment over the next 20 years.

Consequently, the screening will identify high-risk areas to deploy broadband infrastructure due to projected climate change (henceforth known as “climate-risk areas”). Therefore, the initial hazard assessment will take place prior to the publication of project areas and prior to the Deployment Subgrantee Selection Process. Climate risk areas will be flagged to potential subgrantees. In turn, the subgrantee proposers will need to address how they plan to deploy in those areas given certain hazardous climate and weather conditions.

The Corporation intends to flag the relevant climate-risk areas based on the following measurements or categorizations:

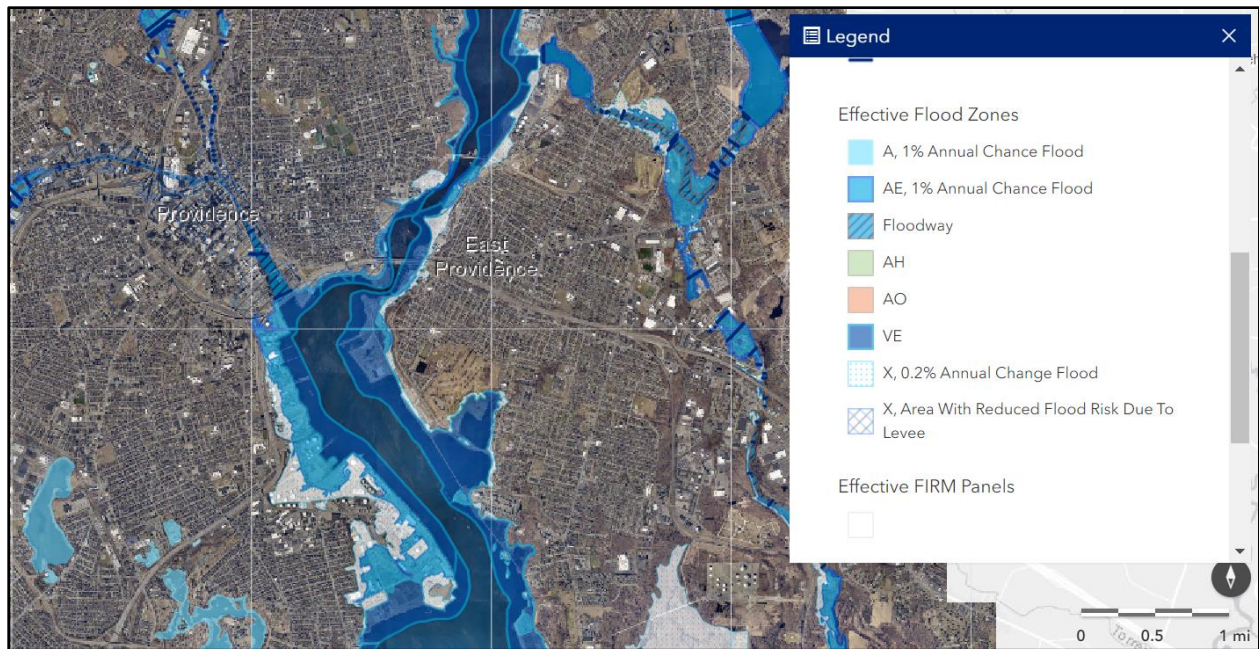
1. Flood zone

2. Distance to shoreline
3. Wind and storm risk

Flood Zone: The Corporation will identify flood zones using the FEMA guidelines for Flood Insurance Rate Maps (FIRM). The FEMA National Flood Hazard Layer will be used to identify the flood zone categorization for all areas:

Category ³²	Threshold
Zone X	Areas subject to inundation by the 0.2% annual-chance flood event or areas of minimal flood hazard
Zone A	Areas subject to inundation by the 1% annual-chance flood event determined using approximate methods
Zone AE	Areas subject to inundation by the 1% annual-chance flood event determined using detailed methods
Zone AH	Areas subject to inundation by the 1% annual-chance shallow flooding (usually areas of ponding) where average depths are between 1-3 ft.
Zone AO	Areas subject to inundation by the 1% annual-chance shallow flooding (usually sheet flow) where average depths are between 1-3 ft.
Zone VE	Coastal areas subject to inundation by the 1% annual-chance flood event with additional hazards due to storm-induced velocity wave action

³² RIEMA, "Floodplain Mapping," RIEMA, n.d., <https://riema.ri.gov/planning-mitigation/floodplain-management/mapping> (accessed October 12, 2023).



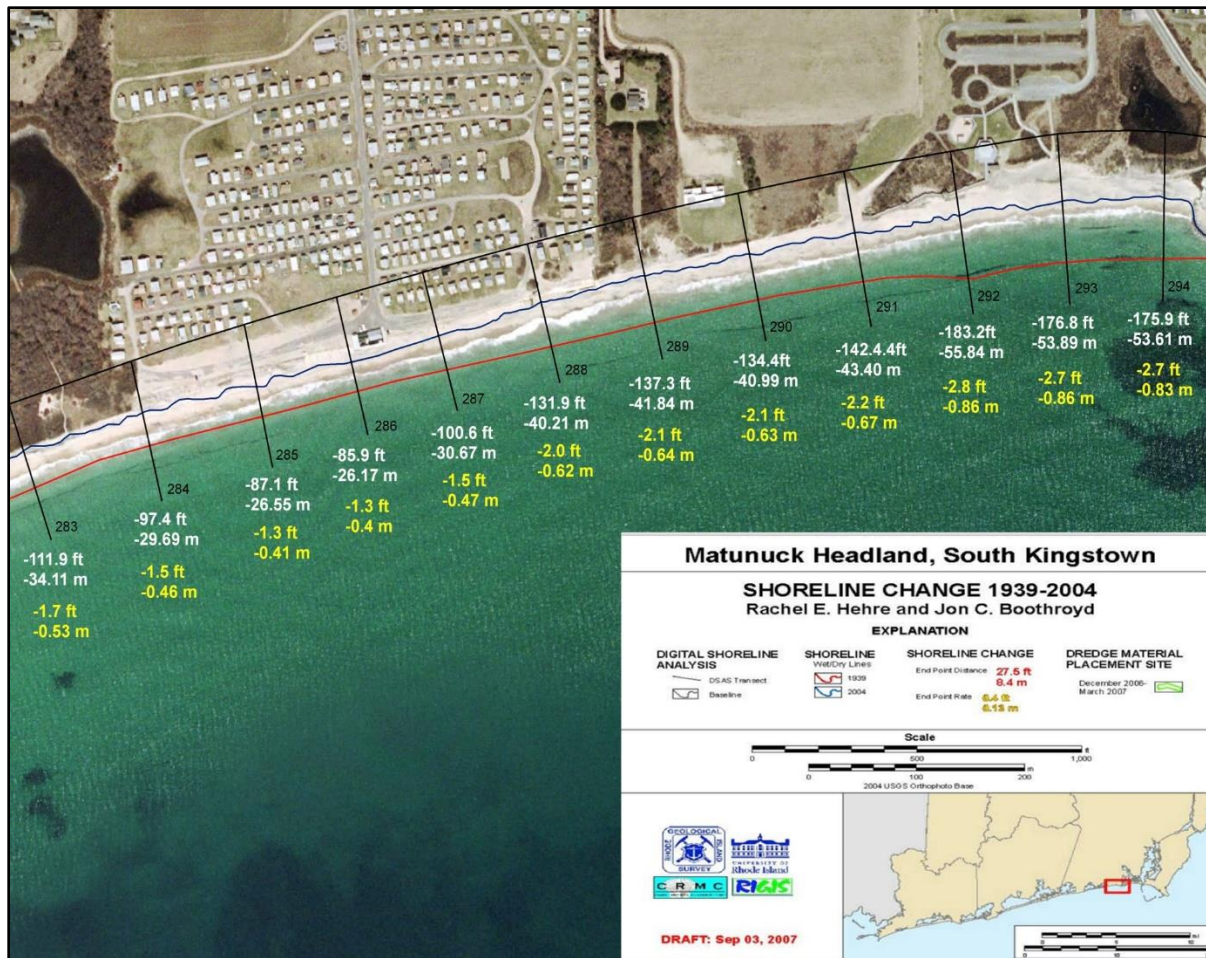
Rhode Island Floodplain Viewer in the greater Providence area. Source: Rhode Island Emergency Management Agency.³³

Distance to Shoreline: According to Rhode Island’s Coastal Resource Management Council’s (CRMC) Shoreline Change Special Area Management Plan (SAMP) 2018, “on average, Rhode Island’s coastline is eroding 1.9 feet per year, with some localities nearly double that.”³⁴ Should the rate of erosion remain consistent with historical averages, Rhode Island’s shore will erode approximately 40 feet over the next 20 years, the assumed lifespan of proposed broadband infrastructure, without accounting for sea-level rise. Should the rate of erosion double historical averages, Rhode Island’s shore will erode approximately 80 feet over the next 20 years.

To be cautious and account for sea-level changes, the Corporation will tag BSLs within 200 feet of the shore as at risk for coastal erosion over the next 20 years.

³³ RIEMA, “Floodplain Mapping,” RIEMA, n.d., <https://riema.ri.gov/planning-mitigation/floodplain-management/mapping> (accessed October 16, 2023).

³⁴ Rhode Island Coastal Resources Management Council, “Executive Summary,” *Rhode Island Shoreline Change Special Area Management Plan*. Rhode Island Coastal Resources Management Council, 2018, <https://www.beachsamp.org/beachsamp-document/> (accessed Oct 12, 2023).



Rhode Island shoreline changes in South Kingstown. The red line represents the position of the shoreline in 1939; blue represents the position of the shoreline in 2004. Shoreline distance is calculated from a “baseline” represented by the black line. Source: Coastal Resources Management Council.³⁵

Wind and Storm Risk: Damages caused by high winds due to winter storms, tropical storms and microbursts are projected to increase across the state of Rhode Island. Storms with winds above 50 mph are most likely to cause damage.³⁶ The coastal areas of Washington County and Block Island experienced the most of Rhode Island’s

³⁵ Rhode Island Coastal Resources Management Council, “Matunuck Headland, South Kingstown, Shoreline Change 1939–2004,” *Rhode Island Shoreline Change Special Area Management Plan*. Rhode Island Coastal Resources Management Council, 2007, http://www.crmc.ri.gov/maps/maps_shorechange.html (accessed Oct 16, 2023).

³⁶ NOAA National Severe Storms Laboratory, “NSSL Research: Damaging Winds,” *NOAA National Severe Storms Laboratory*. National Oceanic and Atmospheric Association, <https://www.nssl.noaa.gov/research/wind/> (accessed Oct 13, 2023).

high wind events over the last 15 years in both frequency and magnitude, being the only areas to report 80 mph wind events.³⁷ Areas which have reported 5 or more annual high wind events exceeding 50 mph in the last 5 years should be flagged as high wind risk areas.

III. Weather and Climate-Related Risks to Current and Future Infrastructure

Utilizing the tools and resources recommended by NTIA, as well as State-issued reports (including *Resilient Rhody*), the Corporation has identified the following weather and climate hazards as the most critical threats to broadband infrastructure (current infrastructure *and* future BEAD-funded infrastructure) in Rhode Island:

- **Storm Frequency and Intensity.** According to the NOAA, Rhode Island has been subject to increasing winter storms and tropical storms over the last decade. As storm frequency and intensity increase, aerial telecom infrastructure (poles, towers, antennae, and other equipment) could be damaged by high winds, heavy precipitation, flooding, and landscape erosion.
- **Precipitation and Inland Flooding.** The NOAA's intermediate scenario predicts that by 2100 Providence will endure tidal flooding nearly every day of the year. This is the result of increased annual precipitation, which is projected to increase 5% per year through the mid-21st century.
- **Sea Level Rise, Coastal Flooding, and Erosion.** Rhode Island's coasts will likely be subject to rising sea levels, which further exacerbates the threat of landscape erosion and flooding in coastal areas. Coastal flooding further threatens to erode the landscape, which could dislodge the existing and future telecom infrastructure built in coastal areas.
- **Increased Air Temperatures.** Global warming will continue to elevate the average air temperature around the world, affecting not only the vulnerable coastal areas, but also inland areas. Rising temperatures could influence

³⁷ National Weather Service, Storm Events Database, 2008-2023. Distributed by NOAA National Centers for Environmental Information. <https://www.ncdc.noaa.gov/stormevents/> (accessed October 13, 2023).

power and broadband infrastructure, which requires cooling.

IV. Mitigation Plan

The Corporation plans to address these obstacles through:

- 1 The assessment of the viability of proposed broadband network deployments, as well as appropriate use of other IIJA funds to improve infrastructure across Rhode Island,
- 2 The consideration of an EHCPLT to ensure efficient deployment of capital in areas with remote or challenging topography, and
- 3 The requirement of all subgrantees to commit to maintaining BEAD-funded broadband infrastructure over its 20-year lifespan, despite the potentially higher maintenance costs resulting from climate change.

As a part of the Deployment Subgrantee Selection Process, potential subgrantees must address the climate and weather risks in project areas for which they apply. The Corporation may require subgrant proposers to submit ongoing maintenance and climate change mitigation plans as part of their proposal. While subgrantee candidates will be asked to address climate risks, responses will be included as a selection criterion; rather, climate considerations are a gating factor for participation in the Deployment Subgrantee Selection Process (i.e., only proposals that demonstrate consideration of relevant climate risks and include mitigation plans, which detail how subgrantees will address these risks, will be considered complete and eligible for participation in the Deployment Subgrantee Selection Process).

Examples of appropriate mitigation plans include, but are not limited to:

- Discussion of buried vs. aerial fiber – the state’s vulnerability to hurricanes and similar storm conditions may make deploying buried fiber a better long-term solution. However, given projected sea-level rise and coastal and inland flooding concerns, aerial fiber may make more sense to deploy in certain areas.
- Build plans must take into consideration the expected risks of flooding and

rising sea levels. ISPs must build new infrastructure under the assumption that the equipment could be exposed to underwater conditions and may need to include conduit to allow buried fiber assets to be easily replaced if needed.

- ISPs will budget for back-up generators or other sources of alternate power to ensure redundancy in electrical systems.

Additionally, Rhode Island has outlined numerous climate change and hazard mitigation strategies to protect the state's population, infrastructure, and resources. *Resilient Rhody* (last updated in 2021) highlights measures that the State plans to take or already has underway. These initiatives underscore Rhode Island's state-wide commitment to prepare for climate change and contribute to this Initial Proposal's mitigation strategies as it relates to broadband infrastructure. Relevant highlights of the plan include:

- The Coastal Resources Management Council (CRMC) is a resource for developers; the agency's goal is to raise awareness of coastal hazards like sea level rise and shoreline erosion and guide developers away from vulnerable areas.³⁸
- Office of Energy Resources (OER) is developing a Microgrid Plan; microgrids are municipal-level grids that can disconnect from the larger electrical grid, increasing municipal energy resilience and reducing the risk of power loss to essential facilities, including telecom.³⁹
- Stormwater infrastructure upgrades noted as necessary as precipitation patterns have changed since the state's current infrastructure was built over 75 years ago. Rhode Island Department of Environmental Management (RIDEM) and Rhode Island Department of Transportation (RIDOT) have multiple initiatives and programs related to improving stormwater management and

³⁸ Rhode Island Infrastructure Bank, *Resilient Rhody Three-Year Impact Report*, Rhode Island Climate Change, 2021: p. 4 <https://climatechange.ri.gov/resilient-rhody> (accessed October 13, 2023).

³⁹ Ibid p. 8

designing green Low-Impact Development (LID) strategies that reduce runoff and ease the impact of increased precipitation.⁴⁰

Relatedly, the State Hazard Mitigation Plan (SHMP), last updated in 2019, provides an overview of all hazards that threaten Rhode Island and potential mitigation strategies to be undertaken by state or federal agencies and/or public-private partnerships. Apropos of this Initial Proposal, the SHMP lays out multiple agencies, initiatives, procedures and plans that help address natural disasters, including floods and severe storms that threaten infrastructure.⁴¹ Rhode Island's many mitigation strategies include preventative, proactive, and reactive measures. Examples include:

- Preventative:
 - o Enhanced Hazard Tree Mitigation Plan (National Grid)⁴²
 - o Debris Management Plan Technical Assistance (RIEMA)⁴³
 - o Energy Assurance Plan (Rhode Island Office of Energy)⁴⁴
 - o Rhode Island Ocean Special Area Management Program (CRMC)⁴⁵
- Proactive
 - o Real-time monitoring of river stage, streamflow tides and pond levels (US Geological Survey)⁴⁶
 - o Real-time flooding inundation mapping studies (US Geological Survey)⁴⁷
 - o Shoreline Change Maps (CRMC)⁴⁸
- Reactive
 - o Swift emergency response to infrastructure damage from various

⁴⁰ Rhode Island Climate Change, *Resilient Rhody: Rhode Island Statewide Climate Resilience Action Strategy*, Rhode Island Climate Change, 2018: pp. 24-25 <https://climatechange.ri.gov/resilient-rhody> (accessed October 13, 2023).

⁴¹ RIEMA, "Table 4.1 Current Plans, Programs, Policies and Funding Opportunities that Support Risk Reduction, Community Resiliency and Mitigation Activities," *State Hazard Mitigation Plan*. RIEMA, 2019. Pages 4-3-8. <https://riema.ri.gov/planning-mitigation/hazard-mitigation/hazard-mitigation-planning> (accessed October 13, 2023).

⁴² Ibid, 4-3

⁴³ Ibid, 4-5

⁴⁴ Ibid, 4-6

⁴⁵ Ibid, 4-7

⁴⁶ Ibid, 4-8

⁴⁷ Ibid, 4-8

⁴⁸ Ibid, 4-3

- agencies and internet service providers as laid out in various plans
- o Flood event summaries and studies (National Weather Service)⁴⁹

V. Plan for Long-Term Reassessment of Climate Risk

To ensure that BEAD-funded infrastructure will withstand climate risks, the Corporation will continue to monitor climate change progression utilizing the national and state resources outlined in the initial hazard screening process. Additionally, the Corporation will require subgrantees to commit to long-term maintenance plans. Finally, the Corporation will monitor subgrantees to ensure that climate risks are being properly considered and addressed in deployment programs.

2.11.1 Optional Attachment: Relevant Reports

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.

Relevant statewide initiatives related to climate resilience and hazard mitigation are:

- **Resilient Rhody Climate Resilience Action Strategy (updated 2021)⁵⁰**
 - o Available [here](#).
 - o This Initial Proposal has been informed by Rhode Island's *Resilient Rhody Climate Resilience Action Strategy*, which was most recently updated in 2021 (originally adopted in 2018). This strategy details the impacts of climate change and highlights the numerous state agencies, projects, and initiatives that are designed to mitigate climate change impacts.

⁴⁹ Ibid, 4-3

⁵⁰ Rhode Island Climate Change, *Resilient Rhody: Rhode Island Statewide Climate Resilience Action Strategy*, Rhode Island Climate Change, 2018: <https://climatechange.ri.gov/resilient-rhody> (accessed October 13, 2023).

- **Rhode Island State Hazard Mitigation Plan (2019)**⁵¹
 - o Available [here](#).
 - o The Rhode Island State Hazard Mitigation Plan (SHMP) identified the most significant climate risks in Rhode Island based on likelihood of occurrence, range of impact, and the probable level of impact.⁵² The Corporation used this list of climate risks as a starting point to look at the impact of climate change on broadband infrastructure. Additionally, the SHMP provided a list of local, and state resources, agencies, databases, and initiatives responsible for collaborating on climate change mitigation and their capabilities, funding and technical assistance.

⁵¹ RIEMA, *State Hazard Mitigation Plan*. RIEMA, 2019. <https://riema.ri.gov/planning-mitigation/hazard-mitigation/hazard-mitigation-planning> (accessed October 13, 2023).

⁵² RIEMA, “3.4 Hazard Ranking Methodology,” *State Hazard Mitigation Plan*. RIEMA, 2019. Page 3-14. <https://riema.ri.gov/planning-mitigation/hazard-mitigation/hazard-mitigation-planning> (accessed October 12, 2023).

2.12 Low-Cost Broadband Service Option (Requirement 16)

2.12.1 Low-Cost Broadband Service Option(s)

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.*

Provided that the Affordable Connectivity Program (ACP) or any successor program remains funded, the Corporation will adopt the example low-cost broadband service option definition as outlined in the BEAD NOFO. As a result, the Corporation will require subgrantees to provide the following low-cost broadband service option:

- The proposed service option:
 - o Costs \$30 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;
 - o Allows the end user to apply the Affordable Connectivity Benefit subsidy to the service price;
 - o Provides the greater of (a) typical download speeds of at least 100 Mbps and typical upload speeds of at least 20 Mbps, or the fastest speeds the infrastructure is capable of if less than 100 Mbps/20 Mbps or (b) the

performance benchmark for fixed terrestrial broadband service established by the Federal Communications Commission pursuant to Section 706(b) of the Communications Act of 1934, as amended;

- 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; and
 - In the event the internet service provider 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 no additional cost.
- Subgrantees are required to participate in the Affordable Connectivity Program or any successor program, and Eligible Subscribers that are eligible for a broadband service subsidy can apply the subsidy to the proposed service option. Proposers are strongly recommended to establish that potential customers are conscious of their participation in the Affordable Connectivity Program.
 - The Corporation will require the low-cost broadband service option to be offered by subgrantees to those who are eligible to participate in the FCC's Affordable Connectivity Program. Criterion for eligibility can be found on the ACP's website [here](#). Subgrantees are prohibited from imposing extra eligibility conditions beyond what the Affordable Connectivity Program mandates.

If the ACP is depleted or otherwise suspended and no successor program created, the Corporation will require subgrantees to provide the following low-cost broadband service option:

- The proposed service option:
 - Costs \$30 per month or less, inclusive of all taxes, fees, and charges, with no additional non-recurring costs or fees to the consumer;
 - Allows the end user to apply any state or federal connectivity subsidy to the service price;
 - Provides the greater of (a) typical download speeds of at least 100 Mbps and typical upload speeds of at least 20 Mbps, or the fastest speeds the

infrastructure is capable of if less than 100 Mbps/20 Mbps or (b) the performance benchmark for fixed terrestrial broadband service established by the Federal Communications Commission pursuant to Section 706(b) of the Communications Act of 1934, as amended;

- 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; and
 - In the event the internet service provider 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 no cost.
- The Corporation will require the low-cost broadband service option to be offered by subgrantees to households located in areas in which the percentage of individuals with a household income that is at or below 150 percent of the poverty line applicable to a family of the size involved is higher than the state percentage of such individuals.

2.12.2 Check Box: ACP Participation Requirement for Subgrantees

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

- Yes, the Corporation certifies that all subgrantees will be required to participate in the Affordable Connectivity Program or any successor program.

2.13 Middle-Class Affordability Plans

2.13.1 Middle-Class Affordability Plan

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.

Affordability is a primary goal of the ConnectRI program. As a result, the Corporation will ensure all middle-class families in the BEAD-funded network's service area have access to high-speed broadband at reasonable prices.

To achieve this goal, the Corporation has designed the Deployment Projects Subgrantee Selection Process & Scoring Approach to emphasize affordability, which is selection criterion with the largest impact on a proposer's potential score. As articulated within Section 2.4 of this Initial Proposal, the Corporation will score proposers, in part, based on the prices they commit to offering for high-speed broadband; proposers with more affordable prices will receive scores higher than proposers with less affordable prices.

2.14 Use of 20 Percent of Funding (Requirement 17)

2.14.1 Funding Allocation Request

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 Corporation is requesting 100% of Rhode Island's \$108,718,820.75 allocation in BEAD funding for use upon approval of the Initial Proposal.

The Corporation anticipates that the intended use of funds will include the following activities:

- Activities required as part of the Initial Proposal, such as the design and implementation of the Subgrantee Selection Process and the design and implementation of the External Engagement and the execution of the Challenge Process,
- Administrative costs subject to the 2% cap that will fund expenses relating (directly or indirectly) to administration of the grant under Section 60102(d)(2)(B) of the Infrastructure Act,
- Administrative Costs not subject to the 2% Cap that will be used for

- administrative purposes, other than the administration of the grant, and
- Deployment activities that will fund programmatic costs for broadband deployment, including construction and acquisition of infrastructure, as well as workforce preparation/training.

The Corporation does not anticipate implementing any Non-Deployment Activities upfront and will focus its efforts on broadband deployment and administering the program.

The Corporation's request is based on the following:

- The expected capital cost to expand broadband networks to all unserved and underserved locations in Rhode Island.
- The desire to implement a successful and competitive Subgrantee Selection Process, as defined in Requirement #8 (Deployment Subgrantee Selection) that will attract a wider and qualified pool of potential subgrantees, maximizing the reach of BEAD funding in Rhode Island when neighboring states are also conducting similar processes.
- The obstacles for broadband deployment and resilience in areas with remote or challenging access posed by Rhode Island's topography, climate conditions and coastal nature of the land, within the 4-year deployment timeframe of the BEAD Program.
- The need to ensure that an adequate skilled workforce is available for broadband deployment, such as trained fiber technicians to construct and maintain fiber networks, is available when those interventions are needed.

The Corporation is requesting funds greater than 20 percent of the state funding allocation to provide budget certainty for proposers. Based on the outreach efforts conducted by the Corporation, a fully funded program will provide confidence amongst subgrantees, creating a more competitive environment for the Subgrantee Selection Process.

Additionally, the Corporation believes that having immediate access to all allocated funds will allow for faster deployment of broadband infrastructure —within the four-year timeframe established in the Notice of Funding Availability statute— including

foundational activities such as workforce development and capacity building for permitting activities.

This approach will ensure all Rhode Islanders can connect to broadband service and address barriers to digital equity and will help achieve the Corporation's objectives of maximizing funding allocation with a focus on affordability and driving economic and workforce development.

2.14.2 Financial Data Entry

Enter the amount of the Initial Proposal Funding Request. If not requesting Initial Proposal funds, enter '\$0.00.'

\$108,718,820.75

2.14.3 Check Box: BEAD Program Requirements Adherence

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."

Yes, The Corporation will adhere to BEAD Program regarding Initial Proposal usage of funds.

2.15 Eligible Entity Regulatory Approach (Requirement 18)

2.15.1 Regulatory Approach

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 internet service 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. 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.

To the knowledge of the Corporation, Rhode Island does not have any laws concerning broadband, utility services, or similar subjects, that either (a) preclude certain public sector providers from participating 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. Block Island's Broadband BI network is an example of a public-private partnership that created Rhode Island's first municipally owned fiber to the home network connecting all locations in New Shoreham, Rhode Island, on Block Island.

2.15.1.1 Optional Attachment: Regulatory Approach

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.

Not applicable.

2.16 Certification of Compliance with BEAD Requirements (Requirement 19)

2.16.1 Check Box: Intent to Comply

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

Yes, the Corporation intends to comply with all applicable requirements of the BEAD Program, including reporting requirements.

2.16.2 Subgrantee Accountability Procedures

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 claw back 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.*

Funding Accountability Framework

The Corporation will distribute funding to subgrantees for all deployment projects on a reimbursable basis. The only costs that will be reimbursed or paid are those that are:

1. Within the scope of the approved deployment project,
2. Consistent with the approved budget, and/or as amended,

3. Consistent with federal cost principles, and
4. Consistent with limitations applicable to the BEAD funding agreement.

The subgrantee agreement will define a funding distribution schedule based on physical completion and testing, if applicable, of the deployment projects and the submittal of sufficient documentation, such as as-built drawings and location data for verification purposes.

For non-deployment projects, the Corporation may consider alternative options to distribute funding to subgrantees that are underrepresented or minority-owned, including but not limited to a one-time advance payment at the outset of the non-deployment project to cover initial working capital needed to deliver the scope proposed. The subgrantee shall submit an itemized invoice detailing any estimated allowable expenses for which the advance payment will be used.

Claw back Provisions

The Corporation will establish provisions to recapture or claw back funds already paid to the subgrantee in the event of the subgrantee's noncompliance with the BEAD Program's requirements, including but not limited to failure to deploy network infrastructure in accordance with mandated deadlines. The Corporation will ensure that its grant agreement will contain a provision that describes the appropriate events that would trigger recapture or claw back of BEAD Program funds, which may include but are not limited to:

- Defective deployment of broadband infrastructure, not meeting reporting deadlines, or other breach under the grant agreement;
- Reasonable indication that the deployment of broadband infrastructure will not be completed within the timeframe specified;
- Failure to offer broadband services at the prices committed to for the required period in the subgrantee's original proposal;
- Third-party claims;
- Failure to make payments due to contractors or subcontractors;
- Incorrect invoicing, including overcharges in violation of the terms of the grant

- agreement;
- Unpaid and delinquent taxes or other debt owed to state agencies by the subgrantee;
 - Any claim against the subgrantee by a state agency arising from this grant agreement or any other agreement between the subgrantee and any state agency; or
 - Any other instances of fraud, waste or abuse related to the funding.

Timely Subgrantee Reporting Mandates

At a minimum, the Corporation plans to include/enforce the following subgrantee reporting requirements:

1. **Financial Reporting.** The subgrantee will submit financial reports in the format and frequency required by the Corporation. The Corporation will request subgrantee financial reporting on a quarterly basis; however, it reserves the right to set up more frequent cadence (e.g., monthly, every other month) based on the subgrantee risk profile. Failure to submit the required financial reports may cause a delay or suspension of funding.
2. **Activity (Programmatic) Reporting.** The subgrantee will submit activity reports in the format required by the Corporation. The Corporation will request subgrantee activity reporting on a quarterly basis; however, it reserves the right to set up more frequent cadence (e.g., monthly, every other month) based on the subgrantee risk profile.
3. **Close-out Reporting.** The subgrantee will complete all applicable administrative actions and all required work of the subgrant by the date specified in the grant agreement, including but not limited to: (i) submission of final financial, activity and other reports; (ii) completion of all outstanding obligations, so no new obligations are to be made after the end of the performance period; (iii) post close-out adjustments to the final financial report if an audit or review of the subgrantee occurs after the award close out; or (iv) completion of a close-out checklist to the Corporation certifying the

items contained in the Close-out Reporting process have been addressed.

Robust Subgrantee Monitoring Practices

The Corporation will implement the following practices to proactively monitor subgrantee, or subrecipient,⁵³ practices throughout the duration of their projects, ensuring accountability and compliance with all BEAD Program requirements. Per 2 C.F.R. Part 200 Subpart D, 200.331-333 (Subrecipient Monitoring and Management):

1. The Corporation will ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward. Required information includes:
 - i. Federal award identification;
 - ii. All requirements imposed by the Corporation on the subrecipient so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award;
 - iii. Any additional requirements that the Corporation imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports;
 - iv. An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government;

⁵³ The BEAD NOFO generally uses the terms “subgrantee” and “subgrant” because these are the terms used in the relevant Infrastructure Act provisions. Applicable regulations governing federal financial assistance generally use the term “subrecipient” to refer to what the Infrastructure Act calls “subgrantees” and the term “subaward” to refer to what the Infrastructure Act calls “subgrants.” See generally 2 C.F.R. Part 200. As used herein, the terms “subgrantee” and “subgrant” herein are meant to have the same meaning, respectively, as the terms “subrecipient” and “subaward” in those regulations and other governing authorities.

- v. A requirement that the subrecipient permit the Corporation and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part; and
 - vi. Appropriate terms and conditions concerning closeout of the subaward.
2. The Corporation will evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in this section, which may include consideration of such factors as:
- i. The subrecipient's prior experience with the same or similar subawards;
 - ii. The results of previous audits and the extent to which the same or similar subaward has been audited as a major program;
 - iii. Whether the subrecipient has new personnel or new or substantially changed systems; and
 - iv. The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a federal awarding agency).
3. The Corporation will consider imposing specific subaward conditions upon a subrecipient if appropriate.
4. The Corporation will monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. The Corporation monitoring of the subrecipient must include:
- i. Reviewing financial and performance reports required by the Corporation.
 - ii. Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the Corporation detected through audits, on-site reviews, and written confirmation from the subrecipient,

- highlighting the status of actions planned or taken to address Single Audit findings related to the particular subaward.
- iii. Issuing a management decision for applicable audit findings pertaining only to the Federal award provided to the subrecipient from the Corporation.
 - iv. The Corporation is responsible for resolving audit findings specifically related to the subaward and not responsible for resolving crosscutting findings.
5. Depending upon the Corporation's assessment of risk posed by the subrecipient (as described in paragraph (2) of this section), the Corporation may use the following monitoring tools to ensure proper accountability and compliance with program requirements and achievement of performance goals:
- i. Training and technical assistance on program-related matters; and
 - ii. On-site reviews of the subrecipient's program operations;
 - iii. Arrange agreed-upon-procedures engagements related to audit services.
6. The Corporation will verify that every subrecipient is audited as required by 2 C.F.R. Part 200 Subpart F.
7. The Corporation will consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the Corporation's own records.
8. The Corporation will consider taking enforcement action against noncompliant subrecipients.

2.16.3 Check Box: Civil Rights and Non-Discrimination in Subgrantee Selection

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

YES, the Corporation will account for and satisfy authorities relating to civil rights and nondiscrimination in the selection of subgrantees.

2.16.4 Check Box: Cybersecurity Compliance and Supply Chain Risk Management

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.*

YES, the Corporation will ensure subgrantee compliance with the cybersecurity and supply chain risk management requirements on pages 70 - 71 of the BEAD NOFO to require proposers to attest that:

Cybersecurity

1. The proposer has a cybersecurity risk management plan (the plan) in place that is either: (a) operational, if the proposer is providing service prior to the award of the grant; or (b) ready to be operationalized upon providing service, if the proposer 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 proposer has a SCRM plan in place that is either: (a) operational, if the proposer is already providing service at the time of the grant; or (b) ready to be operationalized, if the proposer 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 2 Public Comment

2.17.1: Public Comment

Describe the public comment period and provide a high-level summary of the comments received during the Volume I 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.*

The Corporation will solicit input and comments regarding this document from all Rhode Islanders and other stakeholders. The Corporation will post this Proposal to its website, <https://commerceri.com/broadband>, and will announce its release. Feedback is to be provided during the public comment period, beginning November 3, 2023, and ending December 4, 2023. The Corporation will carefully review and consider all feedback submitted through our online comment form, available at <https://commerceri.com/broadband>.

Following the public comment period, the Corporation will update this document prior to its submission to NTIA. This updated document will include a high-level summary of the comments received and details regarding how the Corporation addressed these comments.

2.17.2: Optional Attachment: Supplemental Materials

As an optional attachment, submit supplemental materials to the Volume I 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 NTIA Grants Portal will be reviewed, and supplemental materials submitted here are for reference only.

Not applicable