BEAD Final Proposal

Utah Broadband Center

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Executive Summary

The Utah Broadband Center (UBC) submits this Final Proposal to the National Telecommunications and Information Administration (NTIA) under the Broadband Equity, Access, and Deployment (BEAD) Program. Building on the foundation laid in Initial Proposal Volumes I and II and revised in accordance with the BEAD Restructuring Policy Notice (June 6, 2025), this proposal represents Utah's comprehensive plan for implementation and long-term stewardship of BEAD funds.

This Final Proposal reflects the outcomes of Utah's thorough subgrantee selection process and demonstrates the state's readiness to move into deployment. Through Utah's Benefit of the Bargain (BoB) round, the competitive award process was finalized to ensure that all awards align with BEAD's statutory requirements, prioritize serving unserved and underserved broadband serviceable locations (BSLs), and maximize the efficient use of federal funding. UBC's approach emphasizes transparency, fairness, and fiscal responsibility, ensuring that BEAD investments are deployed where they are most needed while leveraging additional resources to extend impact.

Utah's implementation framework positions the state to deliver not only physical broadband infrastructure, but also the operational, financial, and compliance structures necessary to sustain it. This includes establishing clear monitoring and oversight mechanisms, ensuring adherence to federal and state regulatory requirements, and providing pathways for meaningful community engagement throughout project implementation. The networks funded under this Final Proposal will be designed to meet or exceed the technical and performance standards outlined in the BEAD NOFO and NTIA guidance, ensuring reliability, scalability, and resilience for decades to come.

In sum, this proposal reflects Utah's commitment to closing the digital divide by building future-ready and financially sustainable broadband networks. Through careful planning, stakeholder collaboration, and prudent investment of BEAD resources, Utah is well-prepared to achieve universal connectivity, ensuring that all residents, businesses, and community anchor institutions can fully participate in the digital economy.

Final Proposal Data Submission

0.1 Attachment (Required): Complete and submit the Subgrantees CSV file (named "fp_subgrantees.csv") using the NTIA template provided.

See Exhibit A - Subgrantees

0.2 Attachment (Required): Complete and submit the Deployment Projects CSV file (named "fp_deployment_projects.csv") using the NTIA template provided.

See Exhibit B – Deployment Projects

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

See Exhibit C - Locations

0.4 Attachment (Required): Complete and submit the No BEAD Locations CSV file (named "fp_no_BEAD_locations.csv") using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See Exhibit D- No BEAD Locations

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

Yes

0.6 Attachment (Required – Conditional on a 'Yes' Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named "fp_cai.csv") using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity's compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible

Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity's Challenge Process results

See Exhibit E- CAIs

Requirement 1: Subgrantee Selection Process Outcomes

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

Utah's subgrantee selection process for BEAD deployment projects was conducted in alignment with the procedures outlined in its NTIA-approved Initial Proposal Volume II and updated pursuant to the BEAD Restructuring Policy Notice issued on June 6, 2025. The Utah Broadband Center (UBC) initially created Utah Project Funding Areas (UPFAs) to group eligible broadband serviceable locations (BSLs) based on geography, terrain, prior applicant interest, and cost-efficiency considerations.

The Round 1 application period opened on October 22, 2024, with the Pre-Application, where applicants were asked to submit information about the organization, its experience with broadband deployment projects, and overall eligibility for this program. The Pre-Application was open until December 24, 2024.

At that time, the information submitted in this preapplication was evaluated by reviewers to assess the applicant's capabilities to build, manage, operate, and financially support an awarded broadband network, as well as their potential risk level, to determine whether the applicant was considered low, medium, or high risk. Applicants who were deemed qualified during this initial review were invited to submit proposals on an UPFA basis, which were scored using a rubric approved in Utah's Initial Proposal Volume 2. This rubric prioritized technical capability, financial sustainability, and alignment with statutory broadband goals. Applicants were required to provide basic information about their organization, along with detailed network designs and budgets for each UPFA they proposed to serve. The full application period opened on February 20, 2025 and closed on April 25, 2025.

The Utah Broadband Center was reviewing Round 1 applications and preparing to launch Round 2 of the application period when the BEAD Restructuring Policy Notice was released on June 6, 2025.

The UBC shared the new timeline and requirements for the Benefit of the Bargain (BoB) round, as described in the Restructuring Policy Notice, with stakeholders on the Virtual Connecting Utah Monthly Call on June 18, 2025. All contacts on the Utah Broadband

Center's email list, including ISPs, vendors, government officials, and community partners, were invited to this meeting. During this call, the Utah Broadband Center announced that the BoB round would be open from June 27, 2025, to June 10, 2025.

On June 19, 2025, the UBC published a newsletter with a brief overview of the restructuring notice, informing readers about the shift in technology priorities and directing them to the UBC website for more details about the changes.

UBC sent a formal email to applicants on June 23, 2025, informing them of the restructuring notice and UBC's new application timeline. This email also included an invitation to a virtual training and office hours event on June 26, 2025.

On June 25, 2025, UBC informed those who had shown interest in participating in the BEAD grant program after the pre-application period had ended about the restructuring policy notice. This communication included the new timeline and an invite to the virtual training and office hours.

The virtual BoB training and office hours event was held on June 26, 2025. During this session, UBC staff and consultants provided an overview of the revised grant process, grant application guide, grant application portal, and shared updated maps. A recording of the virtual training and office hours was also available on UBC's website for public viewing.

The BoB round was open from June 27, 2025, to July 10, 2025. The following modifications to the original BEAD application and subgrantee selection process for the BoB round were made:

- **Priority Broadband Technology:**

  Utah adopted NTIA's requirement to prioritize selection based first on the priority technology to guarantee service that met speed, latency, reliability, and consistency in quality of service requirements; and to ensure that the built network can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G successor wireless technologies, and other advanced services unless it would incur excessive costs.

- **Primary Selection Criteria**:

  Utah adopted NTIA's requirement to prioritize selection based on the lowest BEAD program outlay per location. Total BEAD subsidy per BSL became the primary criterion for all awards.

- **Use of Secondary Scoring Criteria**:

  For applications within 15% of the lowest BEAD cost per location in the same UPFA, secondary scoring criteria were used to break ties. These included:

- Speed to deployment, based on evidence of readiness
- Speed and technical capacity of the proposed network
- Previously identified preliminary/provisional subgrantees

- **Scoring Revisions**: The updated scoring rubric removed categories such as open access, workforce development, affordability, and Tribal/local coordination from scoring. These elements were no longer required or scored under NTIA policy and were replaced with attestation-based compliance or streamlined checks.

- **High-Cost Location Flexibility**: Applicants were allowed to identify extremely high-cost BSLs for potential exclusion from proposals. Such exclusions required justification and were reviewed by UBC.

- **Pro-Forma Updates**: All applicants were required to submit or update financial pro-formas that reflected consolidated cash flow, revenue expectations, and assumptions tied to the proposed UPFAs.

The application structure was refined into two parts: one covering general applicant qualifications, and a second part tailored to each UPFA with project-specific budgets and system designs. UBC ensured all eligible prospective subgrantees were able to apply and that no provider type was excluded in compliance with 47 U.S.C. §1702(a)(1).

Unlicensed Fixed Wireless: The restructuring of the BEAD policy allowed for Unlicensed Fixed Wireless (ULFW) to be considered priority broadband if sufficient evidence could be provided by the service provider that the service meets NTIA's definition of a priority technology. To prevent overbuilding, UBC utilized the specifications listed in Appendix A of the Restructuring Policy Notice to identify broadband serviceable locations already served by ULFW.

The Utah Broadband Center (UBC) notified ULFW providers of this change by posting an invitation on its website on June 12, 2025, giving them through June 18, 2025, to submit evidence to UBC that BEAD funds are not required for locations they already serve.

UBC reviewed the FCC's National Broadband map to identify which ULFW providers offer service to BEAD-eligible broadband serviceable locations. Seven ULFW providers were identified through this process. These providers were notified, through a posting on UBC's website, that they had a seven-day period to respond, indicating that they intended to submit evidence that BEAD funding is not required for the locations they serve.

UBC received three submissions for the ULFW challenge, totaling 9,434 locations. A third-party consultant was used to review the evidence submitted in response to these

challenges and determine whether the locations were receiving scalable, reliable broadband that met the NTIA's technical service requirements for BEAD-funded networks. Based on their analysis, 3,581 locations were determined to have qualifying service and were subsequently removed from BEAD eligibility.

To ensure that BEAD funds are directed to broadband serviceable locations that are truly unserved or underserved, UBC developed a process whereby locations could be submitted for inclusion on the Final Proposal No BEAD Location list throughout the BEAD application period. This process was designed as follows:

1. Eligible participants will develop a list of locations they deem to be non-BEAD eligible, along with the relevant reason code and sub-code for each location.

2. Eligible participants will collect the relevant evidence for each location, based on the selected reason code and sub-code for that location. The reason codes and sub-codes were identified by NTIA's Final Proposal guidance. UBC directed participants to use reason codes 1-5, as follows:

    a. Reason code 1: Location should not have broadband service

    b. Reason code 2: Location does not need mass market broadband service

    c. Reason code 3: Location has been removed from the Fabric version 6 by the FCC

    d. Reason code 4: Location is already served by an enforceable commitment

    e. Reason code 5: Location is already served by non-subsidized service (privately funded network)

3. Eligible participants will format the evidence for each location according to the best practices identified by NTIA.

4. Eligible participants will submit challenges to the Federal Communications Commission for locations that are still showing as unserved/underserved on the latest version of the Fabric in order to either designate them as served or remove them from the Fabric before Utah's Final Proposal is submitted to NTIA.

5. Eligible participants will submit the list of locations and the associated evidence to UBC.

6. UBC will review the submitted locations and evidence to determine whether any additional evidence is required to verify the status of the location.

7. After evidence verification, UBC will add the locations to the *fp_no_BEAD_location.csv* and will create an evidence folder for each location where the submitted evidence will be saved and available for review as needed.

Eligible participants in this process include internet service providers and telecommunications carriers, local and regional governments, Tribal governments, state agencies, and nonprofits.

UBC developed an online submission portal for No BEAD Location submissions and provided technical assistance materials to facilitate participation in this process. By the time UBC's final proposal was published for public comment, 11,310 additional locations were identified as No BEAD locations. Of these, 282 were included for reason code 1; 5 for reason code 2; 3,058 for reason code 3; 2,422 for reason code 4; and 5,543 for reason code 5. Locations determined to be served by unlicensed fixed wireless per the BEAD Restructuring Policy Notice were included on this list. This left 32,229 BEAD eligible locations to be awarded.

Following the public comment period, additional location evidence was verified that demonstrated locations were already served. At time of submission of the Final Proposal to NTIA, the total number of No BEAD locations was 12,470. Of these, 295 locations were included for reason code 1; 5 for reason code 2; 3,064 for reason code 3; 2,422 for reason code 4; and 6,684 for reason code 5.

After the data curing period with NTIA, the total number of No BEAD locations was 12,634. Of these, 284 locations were included for reason code 1; 4 for reason code 2; 3,232 for reason code 3; 2,430 for reason code 4; and 6,684 for reason code 5.

Proposals in the BoB Round came in over $43.7 million less than the original first round for more locations, with solid proposals meeting priority technologies. Utah ensured universal coverage by conducting subsequent negotiation rounds with the applicants.

Applicants were permitted to include BEAD-eligible CAIs in their project proposals, but were not required to do so. Following subgrantee selection, 26 BEAD-eligible CAIs were included in provisional awards: 21 public safety entities, 3 libraries, 1 government building (town hall), and 1 community support organization. The community support organization, the Hurricane Senior Citizens Center, offers computer and internet access to senior citizens for use during business hours. Staff are available to answer questions when asked. The Center is located in a government-owned building and the computers are available for the public.

Some provisional awards with costs above 65% of NTIA's high cost threshold were selected. Justifications for those costs and project selections have been emailed as an

attachment to UBC's Federal Program Officer. One provisional award has been identified by UBC as having extraordinary circumstances, leading to higher costs. A justification of these extraordinary circumstances has been emailed to the FPO as well.

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

The Utah Broadband Center (UBC) designed and administered the Benefit of the Bargain (BoB) subgrantee selection process to ensure it was fair, open, transparent, and competitive. The process was conducted in compliance with Utah procurement policies, 2 CFR Part 200 (Uniform Guidance), and the BEAD Restructuring Policy Notice. The selection process was uniform across all applications and included the following steps:

1. Pre-Application
2. Application Submission
3. Application Review & Scoring
4. Award Review
5. Award Announcement

All potential applicants were asked to submit a pre-application, which was used to verify eligibility. All organizations that submitted a pre-application were given the opportunity to cure any items that could potentially disqualify them from applying. Similarly, once the application period had closed, each application underwent a thorough review for completeness and scoring.

Training and review tools were provided to all reviewers. Reviewers were invited to a synchronous virtual training session, which was recorded and made available for asynchronous viewing. Reviewers were also given a reference guide to ensure that reviews were carried out according to standard review procedures.

The completeness review team consisted of UBC staff members and members of the consulting team. The completeness team's role was to review the submitted materials and determine whether or not the application was complete. The completeness team reviewed each application against the criteria outlined in training materials and process guidance.

Once the reviews were complete, the completeness review team compiled all notes into a summary memo, which was provided to the applicant. The applicant was permitted five days to cure their applications and include any missing information identified in the completeness review process.

Following the completeness review, applicants were moved into a scoring review. The scoring review team was split into Technical and Programmatic Reviewers. Technical reviewers had deep knowledge of broadband system requirements and design elements, while Programmatic Reviewers had experience in government programs and compliance.

According to the Benefit of the Bargain guidelines, a scoring team reviewed all competitive applications against the three Benefit of the Bargain criteria established by NTIA. Two separate and independent scoring reviews were conducted for each application.

A quality review was conducted during the completeness and scoring process to ensure a fair evaluation for all applicants.

The Benefit of the Bargain round consisted of two stages: the application cycle and a negotiation cycle. Following the application cycle, described above, UBC identified locations that either had not received priority project proposals (priority projects were determined using the process described in 12.1) or that were listed as dependencies for larger projects.

In the case where no priority project proposals were submitted, UBC reached out to applicants who submitted priority project proposals for adjacent areas, applicants who indicated an intent to apply for any portion of the funding area in the pre-application but did not, and applicants that have a service area in reasonable proximity, as outlined in UBC's approved Initial Proposal Volume 2. These negotiations resulted in expanding the scope of several priority projects to ensure that BEAD-eligible locations receive reliable, scalable broadband service.

In the case where locations were listed as dependencies for larger projects, UBC negotiated with applicants to determine whether the locations were essential for the success of the larger projects; whether adding additional locations would decrease costs per location; or whether the projects could be effectively deployed without those locations (in the case where the dependent location was also included in a lower-cost priority project proposal). These negotiations resulted in several projects having a lower cost per location and expanding priority projects to more BEAD-eligible locations.

Applicant Requirements to Safeguard Fairness

Applicants were required to meet strict standards of independence, accuracy, and compliance as a condition of participation in the BoB round. Specific safeguards included:

- Conflict of Interest Disclosure Certification: Applicants were required to certify that they had no undisclosed affiliations or conflicts of interest with other applicants

- Anti-Collusion Certification: Each application included an attestation that the submission was developed independently and without collusion with competing applicants

- Accuracy and Compliance Certification: Applicants certified that all information provided was accurate and in compliance with federal, state, and program requirements

- Tribal Consent Requirement: For projects located within Tribal Nation boundaries, applicants were required to obtain a formal resolution of consent from the relevant Tribal government before being eligible for an award

Internal Controls and Oversight

Confidentiality protections under Utah Code Section 63G-2-101 et seq (Government Records Access and Management Act, or GRAMA), and standardized submission formats through UBC's grant portal ensured consistency, transparency, and accountability in the evaluation process. Applicants were required to certify specific statements, which created enforceable safeguards against collusion, bias, arbitrary decisions, or other actions that might undermine confidence in the grant application process.

Through these requirements, UBC ensured that the Benefit of the Bargain round reflected the principles of fairness, transparency, and accountability, consistent with NTIA's expectations for a fair, open, and competitive process under BEAD.

While the Utah Broadband Center received a novation from NTIA and transitioned from the Utah Governor's Office of Economic Opportunity to the Utah Department of Transportation (UDOT) during the Benefit of the Bargain Round, no changes to the application process were required. UBC continues to follow the State of Utah procurement policy.

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

The Utah Broadband Center (UBC) affirms that for unserved or underserved locations where no applications were submitted during the initial funding round, UBC relied on the process described in its NTIA-approved Initial Proposal Volume 2 (IPv2), Section 02.04.02, as updated by the June 6 BEAD Restructuring Policy Notice (RPN). Under this framework, UBC applied a two-stage approach consisting of an Initial Cycle and a Negotiation Cycle. Through both stages, UBC focused on funding Priority Broadband Projects, as defined in

Section 12.1 of this Final Proposal. The evaluation rubric and subgrantee selection process for these locations was the same as for all other BEAD-eligible locations.

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

The Utah Broadband Center (UBC) revised its list of eligible Community Anchor Institutions (CAIs) for the Benefit of the Bargain Round (BoB) to conform with Section 4 ("Optimizing BEAD Locations") of the BEAD Restructuring Policy Notice (RPN). Specifically, UBC removed locations designated under the expansive "C" category definition as approved in Volume 1 of UBC's initial proposal to ensure only those meeting the statutory CAI definition in the Infrastructure Investment and Jobs Act (IIJA), 47 U.S.C. § 1702(a)(2)(E), were retained. In addition, upon receipt of NTIA's list of CAI locations deemed ineligible for BEAD, UBC removed those locations from further consideration. This process removed 995 CAIs that were originally designated as BEAD eligible following approval of UBC's Initial Proposal Volume 1. The final list of eligible CAIs dropped from 2,008 locations to 1,013.

The revised CAI list was reposted on the Utah Broadband Center's public website (https://connecting.utah.gov/grants/big/). As Community Anchor Institution (CAI) coverage was optional for applicants under UBC's application process, no revisions to the application process were necessary.

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

Yes

Requirement 3: Timeline For Implementation

3.1 Text Box: Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband

service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

The Utah Broadband Center (UBC), consistent with 47 U.S.C. § 1702(g)(2)(A), the BEAD NOFO, Utah's NTIA-approved IPv2, the Benefit of the Bargain BIG BEAD Application Guide Addendum 1, and the BEAD Restructuring Policy Notice (RPN), required applicants to demonstrate both readiness and capacity to complete broadband deployment on time and within scope. As a condition of participation, applicants were required to certify that they will begin providing service to all customers who request it within their Utah Project Funding Area (UPFA) no later than four (4) years from the date of the executed subgrant agreement.

Subgrantees who submitted applications committing to deploy broadband to all locations in their project prior to the end of the four year period of performance will receive special award conditions in their subgrantee agreement for those locations where broadband will be deployed in a shorter time frame. They will be required to adhere to their proposed timelines in order for the special award condition to be lifted.

In the case of LEO Capacity Subgrants, UBC will follow the guidance of the BEAD Restructuring Notice, which requires a ten-year period of performance from the date the LEO Capacity Subgrantee certifies to UBC that broadband is available to every location covered by the project.

UBC further requires that all BEAD-funded activities be completed at least 120 days before the end of UBC's period of performance, providing sufficient time for final review and grant closeout.

Applicants were required to submit detailed construction schedules, milestone tracking tables, and capital investment plans that demonstrate full build-out and service activation within the four-year window for each project. Applicants were also asked to provide supporting documentation—such as right-of-way approvals, permits in process, preliminary engineering designs, or equipment inventories—to substantiate their commitments regarding "speed to deployment."

All applicants' technical materials will be required to be certified by a professional engineer, verifying that the network design can deliver qualifying broadband service (100/20 Mbps with ≤100 ms latency) to every BEAD-eligible location in the proposed UPFA. The professional engineer must further attest to the applicant's technical qualifications to complete construction and sustain operations throughout the award period.

After awards are executed, UBC will monitor compliance through its BEAD Monitoring and Compliance Plan. Subgrantees will be required to submit quarterly reports tied to reimbursement requests, with funding contingent on the completion of verified milestones. UBC will actively review progress against the approved timeline, provide technical assistance as needed, and engage regularly with subgrantees to resolve delays. Through this layered oversight approach, UBC will ensure that all BEAD-funded projects are completed on schedule and that all subgrant activities conclude no later than 120 days before the end of Utah's overall BEAD performance period, as required by 2 C.F.R. § 200.344.

Requirement 4: Oversight and Accountability Process

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

Yes

4.2 Attachments: Upload the following two required documents:

(1) BEAD program monitoring plan;

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

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

1. See Exhibit F- BEAD Program Monitoring Plan

2. See Exhibit G – Subgrantee Agreement Draft

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

a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;

b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;

c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;

d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;

e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);

f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and

g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

Yes

Requirement 5: Local Coordination

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

The response must demonstrate Eligible Entity met the following requirements:

a. The public comment period was no less than 7 days; and

b. Political subdivisions were afforded an opportunity to submit comments during the comment period.

The Utah Broadband Center (UBC) conducted a public comment period for its Final Proposal in accordance with NTIA requirements. The Final Proposal was posted on UBC's official website (connecting.utah.gov) from September 26, 2025, through October 2, 2025. Notice of the comment period was distributed through statewide email lists, broadband stakeholder meetings, and direct outreach to broadband providers, Tribal Nations, and counties and municipalities. This ensured that all interested stakeholders had an opportunity to review the Final Proposal and provide feedback.

Once the public comment period concludes, UBC will prepare and publish a high-level summary of the comments received. UBC will also document how comments were reviewed and identify where feedback directly influenced revisions to the Final Proposal, as applicable, while ensuring all updates remain consistent with NTIA guidance and federal program requirements.

For information on how comments were incorporated into the Final Proposal, see Exhibit J: Public Comment Summary.

Requirement 6: Challenge Process Results

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

Yes

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

UBC published the challenge data publicly at https://business.utah.gov/broadband/grants/ on December 10, 2024. After UBC transitioned from the Governor's Office of Economic Opportunity to the Utah Department of Transportation, the data was transferred to https://connecting.utah.gov/grants/big/ on Monday, July 7, 2025.

[This bracketed information is provided to give additional context to UBC's challenge process; it was not included in the submission to NTIA due to character restrictions in the submission portal:

UBC's challenge process consisted of four phases: publication of locations, submission of challenges, submission of rebuttals, and final determination (adjudication) of location service availability. The rebuttal and final determination phases were held on a rolling basis, with 40 days to submit a rebuttal from the time a challenge notification was received and 30 days to complete the final determination from the time a rebuttal was received.

The timeline of the challenge process was as follows:

Location publication from April 8–April 17, 2024 (10 days)

Challenge submissions from April 18–May 28, 2024 (40 days)

Rebuttal submissions from April 25–July 10, 2024 (rolling submissions; 40-day timeline per challenge submission)

Final determinations from May 2–August 6, 2024 (rolling deadline; 30-day timeline per rebuttal submission)

Eligible challengers included internet service providers, units of local and Tribal governments, and nonprofit organizations. Eligible challenges were accepted as outlined in UBC's Initial Proposal Volume 1.

During the challenge process, 67,251 unique broadband serviceable locations were challenged in 127 submitted challenges. The 127 challenges included 77 planned/existing service challenges, 20 availability challenges, 9 technology challenges, 6 measurement area challenges, 5 DSL-only challenges, 3 challenges not part of an enforceable commitment, 3 speed challenges, 3 community anchor institution challenges, and 1 business service-only challenge.

Following the challenge process, UBC compiled the challenge data and submitted it to NTIA for review. NTIA approved the challenge process results on December 6, 2024. Based on the challenge process results, UBC identified 25,823 unserved and 17,716 underserved broadband serviceable locations in Utah, for a total of 43,539 BEAD-eligible locations.]

Requirement 7: Unserved/Underserved Locations

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

Yes

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

Not applicable

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

Not applicable

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

Yes

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

Not applicable

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

Not applicable

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

Yes

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

Yes

Requirement 11: Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience – Implementation of Key Plans

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

UBC's implementation plans, as described in the approved Initial Proposal Volume II – Requirement 14, related to reducing costs and barriers to deployment are in progress.

a. Promoting the Use of Existing Infrastructure–In Progress

    i. UDOT continues to own and administer middle-mile fiber optic infrastructure along State-owned highways throughout Utah. UDOT has a long-standing practice to exchange sections of the empty conduit to private ISPs to allow them to install their own cabling. UBC also allowed applicants to identify existing infrastructure to be used as in-kind match for projects that would facilitate project deployment and decrease BEAD outlay.

b. Promoting and Adopting Dig-Once Policies–In Progress

    i. UDOT has a longstanding dig-once practice and has adopted the Federal Highway Administration (FHWA) Final Rule to promote broadband access for 23 years. UBC has promoted dig-once practices throughout the state and will continue to do so.

c. Streamlining Permitting Processes–In Progress

    i. State Agencies Collaboration. To reduce permitting barriers, UBC is collaborating and will increase collaboration with other State agencies to streamline permitting processes and reduce barriers to broadband deployment. UBC has been working closely with the State Historic Preservation Office (SHPO) and UDOT to identify available resources and capacity to assist with permitting for BEAD projects.

    ii. For example, the Utah State Historic Preservation Office (SHPO) has been made aware of this grant, and has committed to reviewing any submitted materials in 10 business days, which is one-third of the time frame allotted under federal code in 36 CFR 800. The Utah SHPO has legally executed streamlining agreements in place with many of the agencies that would interact, permit, and/or authorize future broadband right-of-way or encroachment applications in rural areas including, but not limited to, the Utah Department of Transportation, Bureau of Land Management, and Utah School and Institutional Trust Lands Administration. Further, the Utah SHPO has established an online submission system for all compliance cases.

    iii. UBC has assigned staff to coordinate permitting activities. They have been actively engaged in permitting discussions with NTIA and will continue to work with State and Federal agencies to streamline permitting processes

d. Streamlining Cost-Effective Access to Poles, Conduits, and Easements–In Progress

i.   Existing state laws in Utah cap the fees for railroad crossings for fiber deployments. Franchise fees are set and administered at the city and county level in Utah, and UBC will continue to emphasize the importance of expediting access to poles, conduits, and easements without exorbitant franchise fees. UBC has pursued legislation for permitting entities but was advised to pause and work with the Utah League of Cities and Towns, as well as directly with the utility or canal companies.

ii. The UBC also supports improvements in the quality of permit and make-ready requests submitted by providers by recommending:

- Establishing a process and framework for expedited resolution.

- Working closely with utility pole owners in unserved and underserved areas to identify the quickest broadband deployment strategies

- Facilitating easement repurposing. By collaborating with stakeholders to optimize the easement, subgrantees can proactively secure rights of way for fiber installations. Furthermore, in cases where a deed or easement is designated solely for utility power, the UBC can encourage subgrantees to expand the scope to include telecommunications usage, thereby transforming it into a viable resource for commercial applications rather than limiting it to private use

e. Streamlining Rights of Way–In Progress

i.   Utah Senate Bill 189, "Small Wireless Facilities Deployment Act" adopted in 2018 streamlined the permit process statewide for wireless providers.

ii. Existing state law in Utah streamlines the permit process statewide for wireless providers. UDOT-owned rights of way across the state are shared with providers when there is a need, and UDOT accommodates broadband as a utility in its ROW. UBC will continue collaborating with agencies to facilitate rights-of-way processes.

iii. UBC has already begun collaborating with the U.S. Forest Service to facilitate the permitting process through a new broadband coordinator at USFS in preparation for BEAD. USFS has also allowed the ISPs to use contractors to satisfy all the NEPA requirements, therefore streamlining the permitting process by months.

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

Yes

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

Not Applicable

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

Yes

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

Not Applicable

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

Yes

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

Not Applicable

Requirement 12: Substantiation of Priority Broadband Projects

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

The Utah Broadband Center established a Priority Broadband Project (PBP) review methodology and applied it fairly and indiscriminately to assess all proposed projects. The methodology included the following:

Step 1: Applicant self-determination with supporting rationale

Step 2: Technology summary review and evaluation based on location factors:

- Density of BSLs;
- Growth potential;
- Geographical terrain, hillside gradients, canyons, mountain valleys, and other similar topographical factors;
- Manmade and natural barriers, including railroads, canals, tree canopy and rivers

Step 3: Review of projects (UPFAs) based on project determination given the location factors

Step 1: Applicant self-determination with supporting rationale

Based on the BEAD Restructuring Notice requirements of 47 U.S.C. §1702(a)(2)(I)(ii), applicants were asked to declare the type or types of technology to be used on the location for which they were applying, whether they considered it to be priority or non-priority, and to provide the following evidence or information about their proposed network:

- Will deliver broadband service at a minimum download speed of 100 Mbps and a minimum upload speed of 20 Mbps with no more than 100 ms of latency, with reliable and consistent service quality;
- Can easily scale speeds over time to meet the evolving connectivity needs of households and businesses;
- Can easily scale speeds over time to support the deployment of 5G, successor wireless technologies, and other advanced services.

Applicants were also asked to provide the estimated cost per BSL to increase speeds to:

- 100 Mbps download and 100 Mbps upload

- 1Gbps download and 1 Gbps upload

If low-earth orbit (LEO) satellite technology was selected as the predominant technology, the applicant was asked to provide information on how they would guarantee that capacity would be available during the 10 years of performance for their selected BSL locations.

This was followed with an attestation that their application was true and accurate.

Step 2: Technology evaluation based on location factors

No applicant declared their technology as anything but priority, so UBC verified the priority of the proposed technologies at each location. To meet this requirement and identify appropriate priority broadband projects, UBC performed initial technology evaluations to understand the limitations of each technology regarding scalability and support for 5G and successor wireless technologies, as well as other advanced services.

1. Fiber Optic Network Priority Broadband Service Analysis

UBC determined that fiber optic networks met the NTIA Priority Technology definition based on the ability of fiber optic technology to utilize varying laser bandwidths to provide increased speeds and capacity, the long lifespan of the major constructed infrastructure and lower cost of upgrading electronics to upgrade service.

Second, the location factors were considered. Fiber was determined to be the priority project for thick canopy, population-dense, low-terrain locations. Because of Utah's terrain, locations that appear densely populated can actually be separated by mountain divides. An in-depth evaluation, involving a literal examination of topographical maps of some of the proposed competing priority projects, as well as the network design evaluation of the proposed engineering of competing projects, was required to verify whether fiber was considered a priority technology for the location.

2. Fixed Wireless Access (FWA)

FWA is restricted by its ability to deliver broadband service based on the radio capability, interference, the terrain line-of-sight, and obstacles, whether leaves, buildings, or mountains.

To determine whether FWA was considered a priority technology for a given location, technical reviewers considered the following factors:

- Proposed bandwidth and signal-to-noise ratio (SNR)
- FWA radio frequency bands and the number of BSLs sharing the radio transmission

- "Noise" or competing radio interference that can impact an FWA transmission
- Purchased spectrum
- Potential "congestion" in the sense of more demand for bandwidth from end users
- Technological improvements (in protocols, receiver sensitivity, and transmitter adjustments with active feedback)
- Interference often from other nearby users of the electromagnetic spectrum
- Mitigation of interference
- Existing tower sites and their location whether remote or in densely populated areas
- Scalability, knowing that networks can only be scaled by installing more radios on more towers to decrease the bandwidth needs on existing equipment
- Potential line of sight (LOS) and sharp changes in terrain
- Licensed by rule spectrum
- Remote areas where buildings are less likely to impact
- Density
- Beam forming
- Inclusion of Multiple Input and Multiple Output in the network design

FWA projects were deemed to be a priority broadband projects in areas that are less densely populated and do not show a propensity to fast growth.

They would not be priority in mountainous areas where FWA signals may bounce off slopes, causing multipath fading, while valleys can act as a signal trap where signals are absorbed or reflected away from intended receivers. They would also not be considered priority in more densely populated areas or with future growth potential..

If FWA was determined to be a priority technology for a location, reviewers then considered the advantages to FWA deployments in comparison to optical fiber networks in terms of cost and speed of deployment.

3. LEO (Low Earth Orbit)

LEO uses many satellites in close proximity to the earth's surface to offer lower latency and faster speeds than traditional GEO (Geostationary Orbit) satellite internet, making it suitable for less densely populated areas. Advantages of LEO satellite technology include wide coverage and providing connectivity where other networks may fail. LEO technology is limited by weather interferences, tree canopy and terrain impacts. LEO technology is also limited in its ability to quickly scale bandwidth to meet demand surges, making them potentially unsuitable for areas with high population density, growth areas, areas with very high internet usage or for applications requiring extremely large amounts of data transmission.

When considering LEO satellite technology as a priority technology for certain locations, UBC considered the number of users and building density as well as terrain variations. UBC also evaluated saturation risk for given locations, using publicly available information regarding satellite beam diameter and throughput capacity. Based on this analysis, UBC determined that the maximum number of LEO users that can be supported per beam at the required minimum BEAD speed of 100/20 is 194 for download and 108 for upload. UBC used 108 subscribers per 50km beam radius as the limiting factor when considering LEO satellite capacity. Since it was improbable that the applicant would restrict their subscriber expansion to just BEAD locations, all locations within the 50km beam radius were included in the evaluation.

This analysis allowed UBC to rank the feasibility of LEO broadband services to provide service to BEAD-eligible BSLs at the project funding level. LEO was identified as the priority technology for less densely populated areas, mountain tops, hogbacks, valleys, plateaus, river valleys, and other challenging locations where the feasibility of providing other broadband service types would be difficult and excessively costly.

Utah scored and ranked all applications at the UPFA level. Projects were determined based on geographic scope and subgrantee. Utah evaluated all applications for the same UPFA for which priority broadband status was sought prior to evaluating the evidence filed in support of the claim. Utah then evaluated the sufficiency of the claim for the highest scoring application using the methodology described above.

Requirement 13: Subgrantee Selection Certification

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

The Utah Broadband Center (UBC) applied the BEAD Restructuring Policy Notice's prioritization framework and scoring criteria consistently across all competitive project applications submitted under the Benefit of the Bargain (BoB) round. In alignment with 47 U.S.C. §1702 and Section 3.4 of the BEAD Restructuring Policy Notice (June 6, 2025), UBC prioritized project selection based on the Primary Criteria of minimal BEAD program outlay. This approach ensured that the combination of awarded projects resulted in the lowest overall cost to the program while still achieving deployment to all unserved and underserved Broadband Serviceable Locations (BSLs).

For the Benefit of the Bargain round, the Utah Broadband Center received 310 applications, which were then converted into 3,682 sub-applications. This enabled a more equitable evaluation at the geographic level and reduced the deduplication required for review.

The sub-applications represented applications for individual UPFAs which were then evaluated using the primary criteria established by the BEAD Restructuring Policy Notice. The Policy stipulates that, in deciding among competing applications covering the same general project areas, Eligible Entities must choose the option with the lowest cost based on minimal BEAD Program outlay.

Where multiple applications for the same Utah Project Funding Area (UPFA) demonstrated costs within 15 percent of the lowest-cost proposal on a per-BSL basis, UBC applied the Secondary Criteria as required by Section 3.4 of the BEAD Restructuring Policy Notice. 66 applications moved to Scoring based on the Secondary Criteria. Each application was evaluated against the following elements, with weights assigned at UBC's discretion, as permitted by the Policy Notice:

- Speed to Deployment – up to 5 points: Binding commitments to complete deployment earlier than the four-year statutory requirement (47 U.S.C. §1702(h)(4)(C)) were awarded additional consideration, with supporting documentation such as rights-of-way, permits, and Tribal resolutions reviewed.

- Technical Capabilities and Network Performance – up to 45 points: Applications were scored based on speed, latency, scalability, and reliability. Higher scores were awarded to projects capable of meeting or exceeding the statutory definition of a Priority Broadband Project (47 U.S.C. §1702(a)(2)(I)) by providing symmetrical gigabit service with low latency and scalability to support future demand.

- Preliminary/Provisional Subgrantee Status – up to 50 points: Consistent with Section 3.4, Utah assigned additional weight to applications from entities previously identified as preliminary or provisional awardees to ensure continuity and timely deployment.

This scoring methodology ensured that UBC's selection process was cost-efficient, transparent, and performance-driven, consistent with the statutory framework and the Restructuring Policy's mandate to eliminate non-statutory criteria.

UBC maintained its initial project areas throughout the application process. This minimized the deconfliction/deduplication necessary. In the Benefit of the Bargain round, applicants were allowed to combine UPFAs and select BSLs for service resulting in larger

project areas and more economical applications. To avoid impacting UBC's ability to ensure that applications were considered on an equal basis, applicants were asked to submit separate budgets for UPFA areas within consolidated project proposals.

For the deconfliction process, UBC used a calculation developed to weight an application's per BSL cost where an applicant included only a portion of the BSLs in a UPFA vs an application that included all or a greater portion of the BSLs. The premise for this was that an applicant may only select those BSLs that were most cost-effective for their application. An applicant who selected more of the BSLs in the UPFA would likely have a higher cost per BSL since some of the BSLs could have a higher cost of construction. The weighting attempted to equalize these expectations by adjusting the cost per BSL to reflect all the BSLs in the UPFA. The resulting weighted costs were used to determine the lowest cost per BSL and whether the costs were within 15% of one another.

By grounding project selection in minimal BEAD outlay, applying only the three authorized Secondary Criteria within the 15 percent threshold, and establishing a deconfliction process that established a weighting that equalized construction costs within an UPFA, the Utah Broadband Center's application evaluation approach fully complies with the requirements of the BEAD Restructuring Policy Notice while ensuring deployment of reliable, scalable, and future-ready broadband networks statewide.

Requirement 14: Environmental and Historic Preservation (EHP) Documentation

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

• Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

• Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.

• Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact

Statement (PEIS), available at https://www.firstnet.gov/network/environmental-compliance/projects/regionalprogrammatic-environmental-impact-statements.

• Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.

• Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances

See Exhibit H - Environmental and Historic Preservation Documentation

Requirement 15: Consent From Tribal Entities

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

The Utah Broadband Center intends to utilize NTIA's programmatic waiver that extends the deadline for meeting the Tribal Consent requirement. This waiver gives Utah more time to work with Tribal Nations where consent has not yet been granted. Tribal Nations that have provided consent include the Ute Indian Tribe. Formal consent from the Navajo Nation is still pending; however, a letter of consent signed by the Chief of Staff of the President has been submitted. No resolution, yet, from the Shivwits Band of Paiutes; they sent a copy of their governing documents.

See Exhibit I - Programmatic Waiver of Tribal Consent Deadline

Requirement 16: Prohibition on Excluding Provider Types

16.1 Question (Y/N): Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments

from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

Yes

Waivers

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

Not applicable

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

Attach match waiver requests