



Vermont Community Broadband Board **Broadband Equity, Access, and Deployment Program**

Final Proposal

As submitted to NTIA December 4, 2025

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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 separately posted *fp_subgrantees.csv*.

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

See separately posted *fp_deployment_projects.csv*.

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 separately posted *fp_locations.csv*.

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

See separately posted *fp_no_BEAD_locations.csv*.

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 upon conclusion of the Challenge Process required under 47U.S.C. § 1702(h)(2)?

VCBB Response: No

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 separately posted *fp_cai.csv*.

Subgrantee Selection Process Outcomes (Requirement 1)

The purpose of this section is for the Eligible Entity to provide data on the allocation of grant funds in adherence with its approved Initial Proposal and document the outcomes of the Subgrantee Selection Process. It requires the Eligible Entity to provide a transparent and detailed account of how it fulfilled its approved Initial Proposal commitments in a fair, open, and competitive manner. Each Eligible Entity must demonstrate that the outcomes of its process prioritized serving unserved locations first, underserved locations second, and (if applicable) CAIs last. The Eligible Entity must also show that its process aligned BEAD grant funds with other funds for broadband that the Eligible Entity receives from the federal government, an Eligible Entity, or any other source.

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.

VCBB's deployment Subgrantee Selection Process remains consistent with the approach approved by NTIA in Vermont's Initial Proposal Volume II, while fully incorporating the modifications required under the BEAD Restructuring Policy Notice. Vermont has maintained the core framework outlined in its Initial Proposal, ensuring transparency, fairness, and competitiveness, while adapting timelines, evaluation criteria, and participation rules to meet the new federal directives.

In alignment with the Policy Notice, Vermont implemented the "Benefit of the Bargain Round" (BoB) with open competition for all BEAD-eligible locations. This round was accessible to any qualified applicant regardless of technology type or prior application round status. The BoB round also incorporated letters of commitment from providers to gauge participation in the BoB round. VCBB's process included a prequalification phase and with the restructuring, the window was reopened to all interested providers, allowing those who had previously qualified to participate, and gave those that didn't participate or previously unsuccessful applicants the opportunity to create, update, or improve submissions.

The evaluation methodology continues to reflect Vermont's original design but now emphasizes cost efficiency in accordance with NTIA's revised requirements. Scoring is technology-neutral and prioritizes the lowest cost to the BEAD Program per location, while still giving due consideration to Priority Broadband Projects. Vermont has incorporated objective standards to determine when a project's cost is excessive, ensuring that the program maximizes coverage while minimizing unnecessary expenditures.

Consistent with NTIA's updated guidance, Vermont applies the Reason Code framework to exclude or appropriately flag BEAD-eligible locations that are ineligible for funding, such as those removed from the FCC Fabric, already covered under enforceable commitments, or served by qualifying unlicensed fixed wireless networks.

Throughout the process, Vermont has upheld the transparency and fairness commitments described in its Initial Proposal. Public notices have been issued, timelines have been applied consistently to all applicants, and webinars were conducted to outline program requirements. Documentation of methodology, reviewer training, and oversight mechanisms have been employed to maintain impartiality, while deconfliction protocols ensure that awarded areas do not overlap with other

enforceable commitments or publicly funded broadband infrastructure builds. Vermont has also updated its Community Anchor Institution list to align with the IIJA statutory definition, removing any entities previously included under broader interpretations and documenting the methodology for this revision.

Per NTIA curing instructions to VCBB of September 17, 2025, and September 25, 2025, VCBB successfully worked with all VT-BEAD Provisional Subrecipients with a BEAD subsidy request over \$11,500 to reduce the project subsidy request or awarded the project to a non-priority applicant with a lower per location cost.

On November 14, 2025, the NTIA Assistant Secretary invoked BEAD Restructuring Policy Notice section 3.4 which states in part that NTIA "...reserves the right to reject any proposed deployment project or specific BSL connection for which costs to deploy are excessive, as determined by the NTIA based on the cost characteristics of the area to be served." This resulted in NTIA rejection of four projects in Vermont's Final Proposal for excessive cost:

- FPA 011 – Hartland
- FPA 046 – NEK Broadband
- FPA 053 – DVFiber Modification
- FPA 055 – Weston

VCBB was instructed to offer all applicants for these specific project areas, regardless of Priority project status an opportunity to negotiate their application to reduce costs. VCBB completed this Best and Final Offer (BAFO) process and resubmitted the VT-BEAD Final Proposal on December 2, 2025.

The outcome of the BAFO was to award the Priority projects for FPAs 011 and 055 to non-Priority, Low Earth Orbit (LEO) satellite and retain FPAs 046 and 053 as Priority fiber-to-the-home projects at a reduced per location cost and with additional cost justification. VCBB also awarded several hundred additional addresses within FPA 046 to LEO. Vermont's BEAD construction grant request is now \$90,448,114. This represents 40 percent of Vermont's BEAD allocation of \$228,913,019.08, and an 11 percent reduction of Vermont's request in the Final Proposal submitted September 4, 2025.

Finally, Vermont has reaffirmed its compliance with federal record retention requirements, ensuring that all application materials, scoring records, process documentation, and performance reports will be preserved in compliance with § 200.334 Record retention requirements.

Pending the approval of this Final Proposal, VCBB will submit a plan to use remaining funds in its BEAD allocation for:

1. Workforce Development – Broadband Technicians and Digital Upskilling Programs;
2. Workforce Development Digital Literacy & Skills Program throughout Vermont Communities;
3. Precision Agriculture - S.M.A.R.T (Sustainable, Modern, Adaptive, Resilient, and Technology-driven Technology) & Workforce Development Apprenticeship Program for Farming;
4. Vermont Air National Guard Secure internet Exchange Point;
5. Installing internet and Wi-Fi infrastructure or providing reduced-cost broadband within a multi-family residential building;
6. Other BEAD-eligible uses as remaining funds allow.

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 Vermont Community Broadband Board (VCBB) designed and implemented the deployment Subgrantee Selection Process in accordance with the commitments outlined in its NTIA-approved Initial Proposal Volume II, ensuring that all awards are made through a fair, open, and competitive process.

Transparency and Equal Access

Consistent with the plan described in Requirement #8, the VCBB published public notices detailing the application process, eligibility requirements, timelines, and scoring rubrics. Notices were posted on the VCBB website, distributed through established contact lists, and accompanied by webinars to maximize visibility. All application materials were made publicly available, providing that every prospective subgrantee had equal access to the same information.

Structured, Competitive Framework

As approved by NTIA, the VCBB's process welcomed applications from all eligible entity types, including cooperatives, nonprofit organizations, public-private partnerships, private companies, utilities, and municipal governments (Vol. II, p. 36). Applications were evaluated using a standardized scoring rubric tied directly to BEAD program priorities aligned with the Restructuring Policy Notice and the statutory requirements of the IIJA. The process emphasized technology neutrality, cost-effectiveness, and the ability to reach all unserved and underserved Broadband Serviceable Locations in defined project areas.

Reviewer Qualifications and Training

Reviewers were selected based on subject matter expertise in broadband deployment, grants management, engineering, financial, or related fields, allowing all evaluations to be conducted by qualified personnel.

Oversight and Documentation

The VCBB maintained a full audit trail for the subgrantee selection process, including process documentation and justifications for award decisions. Program administrators monitored the process to ensure consistency with the NTIA-approved methodology. This oversight, paired with Vermont's public comment and stakeholder engagement framework (Vol. II, Requirement #4, pp. 17–35), ensured that the process remained fair, competitive, and free from bias.

Alignment with BEAD Restructuring Policy Notice

The selection process incorporated all required modifications from the BEAD Restructuring Policy Notice, including updates to scoring emphasis, open participation in the "Benefit of the Bargain" round, and reaffirmation of technology-neutral evaluation criteria while prioritizing cost efficiency.

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.

VCBB received applications for all Final Project Areas. Per the revised VT-BEAD Request for Applications, VCBB stated that "If there are Final Project Areas that do not receive any BoB Proposals that meet the necessary gating requirements, or for which all BoB Proposals meeting the necessary gating requirements are excessively costly and cannot be negotiated to an acceptable subsidy level, VCBB will create an inventory of those areas and may work with any known providers to negotiate a

plan to ensure that these areas are served.” Had VCBB not received applications for all Final Project Areas, it would have utilized this process.

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.

VCBB Response: Not Applicable

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.

VCBB Response: Yes

Timeline for Implementation (Requirement 3)

All planned deployment projects that have been selected and approved should have anticipated start and end dates listed in the *fp_deployment_projects.csv* submission, which indicates that each project will be completed within four years of the receipt of the subgrant.

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.

VCBB Response: Yes

Oversight and Accountability Processes (Requirement 4)

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

VCBB Response: Yes: [Report Fraud, Waste or Abuse | Office of the Vermont State Auditor](#)

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.

VCBB Response: See separately posted *DRAFT – VCBB BEAD Program Monitoring Plan* and *DRAFT – VCB BEAD Agency Policy Documentation*.

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.

VCBB Response: Yes

Local Coordination (Requirement 5)

The purpose of this section is to detail how an Eligible Entity has coordinated with communities within its jurisdiction after submitting its Initial Proposal. The Infrastructure Act establishes minimum requirements for coordination with political subdivisions of the Eligible Entity. The Eligible Entity is required to (1) allow political subdivisions to submit local broadband plans for consideration and (2) participate in the public comment period.

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 public comment period was open for seven days, from August 28 to September 4, 2025. VCBB posted the draft Final Proposal on August 28, 2025, on its website and issued a press

release noting that it was available for public comment. VCBB also sent an email to all providers on its master list alerting them of the opportunity to comment. A total of 44 responses came from participating providers, Vermont citizens, town leaders, civic organizations, Vermont's Communications Union Districts, and one national public interest group. Comments focused on:

- Strong support for fiber optic technology deployment: 38 commenters, primarily Vermont residents, underlined the importance of fiber optic connections to Vermont businesses, individuals (especially those working from home), telehealth, and overall economic opportunity. Commenters who had recently received fiber service frequently cited the improvements that a fiber connection has had in their lives in addition to the unreliability of the availability and speeds of Low Earth Orbit service. Residents currently lacking broadband heavily underscored the importance of reaching them with fiber, again citing the unreliability and expense of satellite services and the long history of rural Vermonters being left behind by technological progress.
- Specific support for NEK Broadband: Seventeen responses from town officials and residents urged VCBB to provide NEK Broadband (FPA046) with its full award amount to provide as much fiber in the region as possible.
- The national non-profit Education Superhighway urged VCBB to request its full BEAD allocation, regardless of last-mile deployment award totals, and suggested any unused funds should help provide high speed internet to multi-dwelling units. The group noted this would make a significant contribution to closing the digital divide.
- SpaceX commented that Vermont is spending too much on some locations and requested NTIA require the state to re compete those areas.
- Comcast requested public release of the BEAD program monitoring plan.

VCBB will publicly post the comments and respond to those that seek information.

Challenge Process Results (Requirement 6)

The purpose of this section is to ensure that the Eligible Entity has successfully accomplished the following objectives based on its Challenge Process results:

- Identified enforceable commitments funded by the federal government or by the Eligible Entity, within the jurisdiction of the Eligible Entity, to deploy qualifying broadband (including on Tribal Lands).
- Identified each unserved, underserved, and served location within the Eligible Entity in its final list of eligible locations.

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.

VCBB Response: 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.

VCBB publicly posted the final location classifications (unserved/underserved/CAIs) on

6/30/2025, which can be found here: <https://explore-vcbb.hub.arcgis.com/pages/broadband-equity-access-and-deployment>

Unserved and Underserved Locations (Requirement 7)

The purpose of this section is to ensure that all unserved and underserved locations, as identified upon conclusion of its Challenge Process as required under 47 U.S.C. § 1702(h)(2), will be served. The accurate identification of unserved and underserved locations is essential to achieving the goals of the BEAD program of universal coverage. The responses in this section must match the information provided in the Eligible Entity's submitted CSV files.

Coverage of Unserved Locations

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

VCBB Response: Yes

7.2 Question (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.

VCBB removed 4 unserved locations using reason code 7 after determining that costs to serve the locations would be unreasonably excessive, all of which were multi-dwelling units (MDUs). The lowest winning bidder for the project areas where these locations were removed was SpaceX which stated in negotiations with VCBB that serving MDUs using satellite would require extra technical equipment and would not be feasible.

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

VCBB Response: Winning bidder did not provide additional evidence.

Coverage of Underserved Locations

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

VCBB Response: Yes

7.5 Question (Textbox): 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.

VCBB removed 6 underserved locations using reason code 7 after determining that costs to serve the locations would be unreasonably excessive, all of which were multi-dwelling units (MDUs). The lowest winning bidder for the project areas where these locations were removed was SpaceX which stated in negotiations with VCBB that serving MDUs using satellite would require extra technical equipment and would not be feasible.

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.

VCBB Response: Winning bidder did not provide additional evidence.

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 final list of eligible locations through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the *fp_no_BEAD_locations.csv* file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

VCBB Response: 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.

VCBB Response: Yes

7.10 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.

VCBB Response: Yes

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

The purpose of this requirement is to ensure the Eligible Entity is making progress towards the implementation of plans approved in its Initial Proposal, as modified by incorporating the BEAD Restructuring Policy Notice. This requirement also aims to ensure each Eligible Entity is continuing to

implement plans to reduce costs and barriers to deployment, account for network reliability and resilience, and address eligible subscribers' access to affordable broadband service options.

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.

The Eligible Entity will respond by indicating either: 'Complete,' 'In Progress,' or 'Not Started' to describe the implementation of its plans regarding reducing costs and barriers to deployment.

If needed, the following documents can be utilized as a reference resource:

The Eligible Entity can refer to the permitting resources on the [NTIA BEAD website](#), including the [Permitting Best Practices: Case Studies](#) for additional information to incorporate in its response.

The [Permitting Best Practices: Case Studies](#) outlines case studies and examples of streamlining permitting, including Broadband Ready Communities, E-Permitting, and Rights-of-Way. The [Permitting Needs Assessment](#) contains a checklist of four major permitting categories, including Rights-of-Way, Pole Attachments, Conduit Access, and Environment Planning/Historic Preservation.

VCBB Response: In Progress

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

VCBB Response: 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.

VCBB Response: N/A

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.

VCBB Response: 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

VCBB Response: Yes

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

VCBB Response: 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 planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

VCBB Response: N/A

Substantiation of Priority Broadband Projects (Requirement 12)

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.

As part of the application review for the Vermont BEAD program, CTC engineers reviewed the BEAD applications received in the Benefit of the Bargain Round to determine which applications meet the requirements established by the federal government for Priority Broadband Projects.

The methodology for analyzing the applications was developed to align with NTIA's BEAD Restructuring Policy Notice (Policy Notice) and BEAD Frequently Asked Questions and Answers Version 12 (FAQ).

CTC undertook an analysis that is designed to align with the requirements of the Policy Notice. Per those requirements, that analysis is intended to determine:

1. Whether the applicant complied with the data submission requirements of the Policy Notice, which provides that “[a]pplicants must provide supporting documentation sufficient for the Eligible Entity to assess the network application and determine that the proposed network architecture for each specific project area meets this standard.”¹
2. If the applicant did provide sufficient data to enable the appropriate analysis, whether the proposed project meets the Policy Notice’s requirements for a Priority Broadband Project, which is defined as “a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.”

Methodology

To make these determinations, CTC developed a methodology for engineering review that is designed to align with NTIA’s Policy Notice and FAQ, which require that states “establish a review methodology that addresses each component of the statutory definition of a Priority Broadband Project and that can be fairly applied to assess all proposed projects that request Priority Broadband Project Status.”

The methodology is designed to ensure a project-by-project, area-by-area determination that enables every applicant to demonstrate that its proposed project meets the Priority requirements for the specific geographic area for which that project is proposed, as directed by the FAQ, which states that “an Eligible Entity may determine that an applicant with several project proposals across the state may not merit Priority Broadband Project status for all proposals if a proposed technical capability showing is not sufficiently tailored to a given project area.”

The following is a brief summary of the methodology used by CTC to evaluate the applications to

determine whether the proposed projects meet the requirements to be considered Priority Broadband Projects. The methodology enables fair consideration of all applications, regardless of the technology type proposed, to allow for an informed, data-driven determination of whether a given project is capable of meeting the Priority Broadband Project definition.

Data evaluated

The engineering review was based on data provided in each grant application. The data were requested in the application according to technology, with data requests designed to elicit the appropriate information for the state to fulfill the NTIA mandate to analyze whether the applicant's proposed project met the requirements of the BEAD definition of "Priority Broadband Service" in the specific area proposed in that application.

While the assessment described in this memo was technology-neutral, the state's requests for data were adapted to the specific technologies proposed by each applicant to ensure that, to the extent that applicants provided sufficient documentation, the reviewers had access to the relevant and appropriate data to enable an informed, data-driven determination of Priority status.

The state's data requests were designed to elicit the appropriate information from the applicants for the following technology types:

1. Fiber
2. Hybrid fiber-coaxial (cable)
3. Licensed fixed wireless
4. Unlicensed fixed wireless
5. Low-Earth orbit (LEO) satellite

Applicants proposing a project with more than one technology (such as a hybrid fiber/fixed wireless project) were requested to provide data in both categories for the relevant BSLs.

The data requests were also designed to place the least burdensome possible requirements on the applicants while still eliciting sufficient information for the state's Priority analysis to be performed in an informed and data-driven manner. For example, spreadsheet templates for licensed fixed wireless and unlicensed fixed wireless requesting data at the BSL level were designed to estimate the performance at each location and also to enable applicants to easily transfer data derived from the network modeling software that is used in the broadband industry to develop conceptual-level designs and that is used to develop designs appropriate for a grant application.

Staffing

The work to analyze the data was undertaken by CTC's staff of broadband engineers. All engineers assigned to this effort have at least a decade of experience in the field. All analysis was overseen or conducted by licensed Professional Engineers on CTC's senior engineering staff.

Analyses Conducted

The following are the specific analyses conducted for each proposed project, by technology type:

- *Fiber*

CTC engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide “supporting documentation sufficient for [the state] to assess the network application.” In the event the applicant’s data submission was determined to be sufficient for this purpose, CTC engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Assess the proposed technology type (i.e., end-to-end fiber project)
- Review the applicant’s data to assess the capacity in the proposed access and distribution network
- Review the applicant’s data to assess the proposed backhaul capacity
- Review the applicant’s data to assess the proposed latency
- Review the applicant’s data to assess whether the network is easily scalable to support evolving connectivity needs
- Review the applicant’s data to assess the ability of the applicant’s network to support 5G and advanced services

➤ *Hybrid fiber-coaxial*

CTC engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide “supporting documentation sufficient for [the state] to assess the network application.” In the event the applicant’s data submission was determined to be sufficient, CTC engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Assess the proposed technology type (i.e., DOCSIS version)
- Review the applicant’s data to assess the capacity in the proposed access and distribution network
- Review the applicant’s data to assess the proposed backhaul capacity
- Review the applicant’s data to assess the proposed latency
- Review the applicant’s data to assess whether the network is easily scalable to support evolving connectivity needs
- Review the applicant’s data to assess the ability of the applicant’s network to support 5G and advanced services

➤ *Licensed fixed wireless*

CTC engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide “supporting documentation sufficient for [the state] to assess the network application.” In the event the applicant’s data submission was determined to be sufficient, CTC engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Review the information submitted by the applicant on spectrum use, network equipment, tower details, sector antenna details, antenna and radio specifications, customer premises equipment (CPE) specifications, signal strength at each proposed BSL, upstream and downstream speed at each BSL, and backhaul

- Review data from the applicant-submitted planning model and compare that model to theoretical maximums (e.g., free-space path loss)
- Review the applicant-submitted planning model to assess whether it adequately accounts for the effects of natural and physical features of the project area, such as terrain and foliage
- Review the applicant's data on the capacity to serve the proposed BSLs in the project area considering the BSLs' locations and physical clustering
- Review the applicant's data to assess the ability of the applicant's network to meet Priority throughput criteria for all BSLs in the proposed project area
- Review the applicant's data to assess the ability of the applicant's network to easily scale to support evolving connectivity needs
- Review the applicant's data to assess the ability of the applicant's network to support 5G and advanced services

➤ *Unlicensed fixed wireless*

CTC engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide "supporting documentation sufficient for [the state] to assess the network application." In the event the applicant's data submission was determined to be sufficient, CTC engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Review the information submitted by the applicant on spectrum use, network equipment, tower details, sector antenna details, antenna and radio specifications, customer premises equipment (CPE) specifications, signal strength at each proposed BSL, upstream and downstream speed at each BSL, and backhaul
- Review the applicant's ability to mitigate potential interference
- Review data from the applicant-submitted planning model and compare that model to theoretical maximums (e.g., free-space path loss)
- Review the applicant-submitted planning model to assess whether it adequately accounts for the effects of natural and physical features of the project area, such as terrain and foliage
- Review the applicant's data on the capacity to serve the proposed BSLs in the project area considering the BSLs' locations and physical clustering
- Review the applicant's data to assess the ability of the applicant's network to meet Priority throughput criteria for all BSLs in the proposed project area
- Review the applicant's data to assess the ability of the applicant's network to easily scale to support evolving connectivity needs
- Review the applicant's data to assess the ability of the applicant's network to support 5G and advanced services

➤ *Low-Earth orbit (LEO) satellite*

CTC engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide "supporting documentation sufficient for

[the state] to assess the network application.” In the event the applicant’s data submission was determined to be sufficient, CTC engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Review the information submitted by the applicant on spectrum use, satellites, service area, Earth stations, and CPE specifications
- Review the applicant’s depiction of its beam area superimposed on the proposed project area to assess the available capacity for the proposed project area
- Review the applicant’s area-specific assessment of capacity, including for proposed BSLs and other users
- Review the applicant’s data and narrative describing backhaul capacity
- Review the applicant’s data and narrative describing sky view, the impact of obstructions such as foliage, and the applicant’s strategy for managing the challenges
- Review the applicant’s data and narrative describing the number of available satellites per user and the effect of handoffs on performance
- Review the applicant’s data and narrative describing latency, jitter, and packet loss under regular conditions and handoff
- Review the applicant’s area-specific assessment of its network’s capacity to support evolving connectivity needs

Subgrantee Selection Certification (Requirement 13)

The purpose of this section is to ensure the Eligible Entity followed its approved Initial Proposal Volume II Subgrantee Selection Process to award subgrants to subgrantees through a fair, open, and competitive process. This section also aims to ensure that the level of benefits (i.e., a particular score, additional points in scoring criteria, lowest cost) given to provisionally selected subgrantees align with the commitments the prospective subgrantees provided the Eligible Entity.

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.

VCBB followed the BEAD Restructuring Policy Notice requirement to adopt a technology neutral approach for the BEAD subgrantee selection. In the Benefit of the Bargain round, VCBB removed the scoring criteria related to labor, employment, and workforce development; climate change; open access/net neutrality; local coordination and stakeholder engagement, non-traditional broadband providers, middle class affordability, and the low-cost service option. The sole remaining primary scoring criteria was Minimal BEAD Program Outlay, and VCBB provisionally awarded a Priority Broadband Project applications with the lowest BEAD outlay request. For FPAs where only non-Priority Broadband Project applications were submitted, VCBB awarded the provider with the lowest BEAD outlay request.

Vermont had no applications that proceeded to secondary scoring, which would have required meeting two necessary conditions: first, two or more Priority proposals were within 15 percent on request BEAD outlay; and second, the proposals were for the same General Project Area. Had any applications been secondarily scored, the criteria would have been:

1. Speed of Network: Vermont considered the download and upload speeds of the technologies proposed by prospective subgrantees seeking to deploy projects that are Priority and Non-Priority Broadband Projects. Prospective subgrantees will be awarded points based on the criteria identified below:
 - 0 points - Download: > 100 Mbps / Upload: < 50 Mbps
 - 10 points - Download: > 100 Mbps / Upload: < 100 Mbps > 50 Mbps
 - 20 points - Download: < 1 Gbps > 100 Mbps / Upload: < 1 Gbps > 100 Mbps
 - 55 points - Download: < 5 Gbps > 1 Gbps / Upload: < 5 Gbps > 1 Gbps
 - 70 points - Download: < 10 Gbps > 5 Gbps / Upload: < 10 Gbps > 5 Gbps
 - 80 points - Download: > 10 Gbps / Upload: > 10 Gbps
2. Other Technical Capabilities: Scoring for this criterion was based on the amount of relative investment the proposed BEAD-funded network will require to accommodate increased capacity demands and service needs until at least December 31, 2040. VCBB will make this determination utilizing data from the technology evidence submission files required in the BoB Round application, to include how the proposed design supports long-term growth, including the use of modular or upgradeable components, capacity reserves, infrastructure that may require replacement or relocation, and how scalability will be ensured equitably across all locations served. The categories were:

- Low: Requires replacement of significant proportion of the BEAD-funded infrastructure: 0 points
 - Medium: Requires modest replacement of electronics and/or minor adjustments in physical plant, including relocation of backhaul and nodes: 5 points
 - High: Requires only minor replacement of electronics and no physical plant redesign, relocation of nodes, hubs, or radios: 15 points
3. Preliminary/Provisional Subgrantees: VCBB availed itself of the provision in the Restructuring BEAD Policy Notice allowing Eligible Entities to give additional weight to applications submitted in prior rounds that VCBB already identified as preliminarily selected. Categories were:
- The BoB Round application was NOT selected as the preliminary winner in the initial round of VT-BEAD applications: 0 points
 - The BoB Round application was selected as the preliminary winner in the initial round of VT-BEAD applications: 5 points

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

The purpose of this section is to ensure that the Eligible Entity provides information on how it will ensure subgrantees will comply with environmental and historic preservation requirements including but not limited to the National Environmental Policy Act of 1969 (42 U.S.C. 4321, et seq.) (NEPA), Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.) (NHPA), Section 7 of the Endangered Species Act (16 U.S.C. 1521, et seq.), Section 404 of the Clean Water Act (33 U.S.C. 1251, et seq.), and all other applicable Federal, state, and local environmental laws and regulations.

It is a BEAD program imperative to ensure projects are in environmental compliance and a condition of the award that each Eligible Entity is a joint lead agency for NEPA.

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/regional-programmatic-environmental-impact-statements>.

- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearance

VCBB Response: See separately posted *VCBB Requirement 14.pdf*

Consent from Tribal Entities (Requirement 15)

The purpose of this section is to ensure that proper guidelines, regulations, and Tribal consent with respect to Tribal Lands were followed for deployment projects on Tribal Lands. For the program's specific instructions on obtaining Tribal consent in the case of consortia, projects in Hawaii, and projects in Alaska, please refer to footnote 70 on page 48 of the BEAD NOFO.

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.

VCBB Response: The State of Vermont has no tribal lands or governments.

Prohibition on Excluding Provider Types (Requirement 16)

The purpose of this section is for the Eligible Entity to certify that it conducted an open subgrantee selection process that did not exclude any of the provider types listed in the Infrastructure Act.

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)?

VCBB Response: Y

Waivers

The purpose of this section is to document any waiver requests the Eligible Entity has submitted or may need to submit for NTIA approval.

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.'

VCBB Response: N/A

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.

If an Eligible Entity indicates that any waiver(s) have been addressed prior to the Final Proposal in Intake Question 18.1—the Eligible Entity has already submitted required waivers or has already been approved by NTIA—the Eligible Entity does not need to attach a waiver as part of its Final Proposal submission.

If an Eligible Entity indicates that waiver(s) will be submitted with the Final Proposal in Intake Question 18.1, the Eligible Entity must attach waiver(s) as part of its Final Proposal submission.

If the Eligible Entity indicates that a waiver is 'Not Applicable' in Intake Question 18.1, the Eligible Entity does not need to attach a waiver as part of its Final Proposal submission.

The Eligible Entity should coordinate with its FPO to submit a waiver request.

VCBB Response: N/A