



# Public Service Commission of Wisconsin

Summer Strand, Chairperson  
 Kristy Nieto, Commissioner  
 Marcus Hawkins, Commissioner

4822 Madison Yards Way  
 P.O. Box 7854  
 Madison, WI 53707-7854

Public Service Commission of Wisconsin  
 RECEIVED: 8/22/2025 4:39:28 PM

August 22, 2025

To those interested:

Re: Broadband Equity, Access, and Deployment (BEAD)  
 Program

5-BD-2025

Comments Due:

**Friday, August 29, 2025**

Comments in this docket must be filed via the [Electronic Records Filing system](#) (ERF). For help with ERF, please contact [PSCRecordsMail@wisconsin.gov](mailto:PSCRecordsMail@wisconsin.gov).

Address Comments To:

**Docket 5-BD-2025**

Public Service Commission  
 P.O. Box 7854  
 Madison, WI 53707-7854

The Commission memorandum concerning the Broadband Equity, Access, and Deployment BEAD Program Draft Final Proposal is being provided for comment. **Comments must be received by Friday, August 29, 2025.** Comments may be filed using the [Public Comments](#) page or Commission's ERF system. The ERF system can be accessed through the Public Service Commission's website at <https://psc.wi.gov>. Members of the public may file comments using the ERF system or may file an original by mail at Public Service Commission, 4822 Madison Yards Way, P.O. Box 7854, Madison, WI 53707-7854.

Members of the public may file comments in one of the following ways:

- **Web Comment.** File a comment on the Commission's web site by accessing this link: [Case Management System - Public Comments](#)
- **Mail Comment.** Send a comment by U.S. mail. All comments submitted by U.S. mail shall include the phrase "5-BD-2025" in the heading and shall be addressed to:

5-BD-2025 Comments  
 Public Service Commission  
 P.O. Box 7854  
 Madison, WI 53707-7854.

The Commission does not accept comments submitted via email or facsimile (fax). Any material submitted to the Commission is a public record and will appear on the Commission's website.

Please direct questions about this docket or requests for additional accommodations for persons with a disability to the Commission's docket coordinator Matthew Marcus at (608) 266-8097 or [matthew.marcus@wisconsin.gov](mailto:matthew.marcus@wisconsin.gov).

Sincerely,

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

Joe Fontaine  
Administrator  
Division of Digital Access, Consumer and Environmental Affairs

JF:bs DL:02091287

Attachment

# **PUBLIC SERVICE COMMISSION OF WISCONSIN**

---

## **Memorandum**

August 22, 2025

### **FOR COMMISSION AGENDA**

TO: The Commission

FROM: Joe Fontaine, Administrator  
Tara Kiley, Deputy Administrator  
Alyssa Kenney, State Broadband and Digital Equity Director  
Rory Tikalsky, Broadband Expansion Manager  
Matthew Marcus, Broadband Policy Lead  
Josie Lathrop, Policy Analyst  
Christina Luna, Policy Analyst  
Division of Digital Access, Consumer, and Environmental Affairs

RE: Broadband and Digital Equity Planning 5-BD-2025  
  
Broadband Equity, Access, and Deployment (BEAD)  
Program Final Proposal

### Suggested Minute:

The Commission (approved the Wisconsin BEAD Final Proposal/approved the Wisconsin BEAD Final Proposal with modifications) and directed staff to finalize the Wisconsin BEAD Final Proposal for submission to NTIA, including making any modifications necessary to gain approval from NTIA.

OR

The Commission did not direct staff to finalize the Wisconsin BEAD Final Proposal for submission to NTIA and directed Commission staff to modify the proposal pursuant to its discussion and return the revised Final Proposal to the Commission.

## Background

On November 16, 2021, the U.S. Congress enacted the Infrastructure Investment and Jobs Act (Infrastructure Act), also known as the Bipartisan Infrastructure Law (BIL), which includes the Broadband Equity, Access, and Deployment (BEAD) Program. Under federal statute 47 U.S.C. § 1701 et seq, the BEAD Program provides \$42.45 billion nationwide with the principal focus of deployment of broadband service through a state-administered competitive funding program. The National Telecommunications and Information Administration (NTIA), which is a part of the U.S. Department of Commerce, administers the BEAD program and has delegated primary administration and implementation to states. Wisconsin administers the BEAD program as a recipient of funding approved under the BEAD Notice of Funding Opportunity (NOFO).<sup>1</sup> Under Wis. Stat. § 16.54, Governor Tony Evers authorized the Public Service Commission of Wisconsin (Commission) to administer BEAD Program funds.

States and other eligible entities are allocated BEAD funds based on a nationwide location-by-location map of broadband service (the National Broadband Map<sup>2</sup>) compiled by the Federal Communications Commission (FCC) as required by the Broadband Data Improvement Act.<sup>3</sup> NTIA calculated BEAD funds for each state based on the sum of the minimum state initial allocation of \$100 million, the calculated high-cost allocation based on each state's share of unserved locations<sup>4</sup> in high cost areas, and the final allocation calculation of any remaining funds. The remaining funds allocation is based on the number of unserved locations (residential

---

<sup>1</sup> See Notice of Funding Opportunity, Broadband Equity, Access, and Deployment Program <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf>

<sup>2</sup> See FCC National Broadband Map <https://broadbandmap.fcc.gov/home>

<sup>3</sup> See Broadband Data Improvement Act, Pub. L. No. 110-385 (2008), <https://www.govinfo.gov/content/pkg/PLAW-110publ385/pdf/PLAW-110publ385.pdf>.

<sup>4</sup> The term “unserved location” means a broadband-serviceable location that the Broadband DATA Maps show as (a) having no access to broadband service, or (b) lacking access to Reliable Broadband Service offered with – (i) a speed of not less than 25 Mbps for download; and (ii) a speed of not less than 3 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.

and business) as a proportion of the national total. As a result of this allocation calculation process, NTIA determined Wisconsin's BEAD funding allocation is \$1,055,823,573.71.<sup>5</sup>

States had to submit BEAD plans to NTIA for approval that outlined their process to achieve universal service for all broadband serviceable locations (BSLs) in the state. Wisconsin submitted the plan in two parts with the Initial Proposal Volume 1 detailing the challenge process, and Initial Proposal Volume 2 detailing the sub-granting process. Both Initial Proposals were approved by NTIA. The challenge process had concluded and the sub-granting process was nearing an end before new BEAD guidance came from NTIA.

On June 6, 2025, NTIA published the "BEAD Restructuring Policy Notice"<sup>6</sup> ('policy notice') that requires Wisconsin to make significant programmatic changes and remove certain requirements previously established in the BEAD NOFO. The policy notice required Wisconsin halt the sub-granting process that began following the previously approved Initial Proposal Volume 2 and rescind all preliminary awards that had been granted through that sub-granting process before the date of the policy notice. The policy notice also required states to conduct a new subgrantee selection round called the BEAD Benefit of the Bargain round (BEAD BOB) and submit the Final Proposal to NTIA by September 4, 2025.

## **Planning Process**

The BEAD NOFO required states to complete a number of planning steps before award decisions. The following list identifies how the Commission and staff implemented those planning steps, and how some steps have been impacted by the issuance of the policy notice.

---

<sup>5</sup> See National Telecommunications and Information Administration BEAD Allocation Press Release <https://ntia.gov/press-release/2023/biden-harris-administration-announces-state-allocations-4245-billion-high-speed>

<sup>6</sup> <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf>

- On February 1, 2023, the Commission established the design of two planning subgrant programs to support Wisconsin’s design and implementation of the BEAD program – the BEAD Local Planning Grant Program and the BEAD Workforce Planning Grant Program. ([PSC REF#: 458495](#).) The Commission awarded BEAD Local Planning Grants and Workforce Planning Grants in its order of April 17, 2023. ([PSC REF#: 464403](#).) Based on the policy notice and subsequent federal clarification BEAD planning grants that remained active as of the June 6, 2025, date of the policy notice were required to end their activities on that date. ([PSC REF#: 554085](#), [PSC REF#: 554084](#), [PSC REF#: 554083](#), [PSC REF#: 554082](#))
- Commission staff conducted extensive outreach and engagement to design and implement a sub-granting process based on the requirements of the NOFO. From October 2022 through June 2025, Commission staff preparations to complete the BEAD sub-granting process included the following:

  - Commission staff, along with their partners, hosted 26 webinars to update and inform stakeholders on BEAD processes and procedures. Webinars covered topics such as tools for community engagement, data utilization, letter of intent process, challenge process, and environmental requirements.
  - Commission staff attended over 300 municipal government meetings to work with local leaders on educating their respective communities on the BEAD process and how best to participate in the program.
  - Commission staff met with Tribal Nations in Wisconsin to ensure Tribes were given the opportunity to meaningfully participate in the BEAD program through a process that honored Tribal consent and sovereignty.

- Commission staff led bi-weekly meetings with UW-Extension and Wisconsin Economic Development Corporation to collaborate on their efforts to build toolkits, host webinars, and create public awareness campaigns so ISPs and local communities could prepare for BEAD tasks.
- The Commission executed a memorandum of understanding (MOU) with the Wisconsin Technical College System to support workforce development for BEAD construction. The policy notice required that this MOU be rescinded.
- Commission staff communicated important BEAD timelines, steps for ISPs and local communities to complete before the subgrant process started, and additional pertinent BEAD related information through monthly newsletters and notices posted on the Commission's electronic record filing system (ERF).
- Commission staff drafted and issued for public comment an Initial Proposal Volume 1 ([PSC REF#: 496853](#)), which laid out the process for identifying and validating locations eligible for BEAD funding, including the BEAD Challenge Process. The Commission approved Volume 1 at its open meeting of November 3, 2023. ([PSC REF#: 486312](#).) NTIA approved Volume 1 on April 11, 2024. ([PSC REF#: 496852](#).)
- Commission staff drafted and issued for public comment Initial Proposal Volume 2 ([PSC REF#: 510388](#)), which laid out the process for evaluating the qualifications of prospective subgrantees, and identifying funding awards to construct service to all BEAD-eligible locations. The Commission approved Volume 2 in its order of January 26, 2024. ([PSC REF#: 489683](#).) Volume 2 was approved by NTIA on July 29, 2024 ([PSC REF#: 510389](#)).

## Initial Implementation

Commission staff began the implementation of the BEAD program by validating BEAD-eligible locations through the challenge process outlined in Volume 1. The process was conducted under the docket 5-BCH-2024. NTIA approved Wisconsin's challenge process results on November 19, 2024 ([PSC REF#: 524422](#)).

Volume 2 implementation began in August 2024 with the opening of the Letter of Intent (LOI) process ([PSC REF#: 511125](#)) under docket 5-BD-2025. The LOI was intended for entities interested in competing for funding in the BEAD subgrantee selection process. The LOI allowed the Commission to evaluate the technical, financial, operational, and managerial capacity of prospective BEAD participants. Applicants that met the federal and state standards and qualifications were invited to apply for funding. There were 35 LOIs submitted and 30 LOIs approved ([PSC REF#: 528689](#)) for fiber and licensed fixed wireless technologies. The Commission opened a separate LOI round for alternative technologies, including unlicensed fixed wireless (ULFW) and low earth orbit (LEO) satellite service. ([PSC REF#: 532872](#).) There were seven alternative technology LOIs submitted and six were approved. ([PSC REF#: 540654](#), [PSC REF#: 541533](#).)

Concurrent to the LOI effort, the Commission developed and deployed the BEAD Grant Award Management Platform for eligible applicants with approved LOIs to submit BEAD applications. The Commission opened Round One on January 13, 2025. ([PSC REF#: 528689](#).) In BEAD Round One the Commission received 425 applications that proposed to serve 95 percent of the BEAD eligible locations. BEAD applications were scored using a rubric, approved by the Commission and NTIA, that addressed cost efficiency and match contributions, affordably priced service, fair labor practices, expeditious deployment, local coordination and



endorsement by county and Tribal governments, and quality of the design and resulting performance of the network. After Commission staff review of applications, the Commission preliminarily awarded approximately \$540 million, which would have served 103,685 BEAD eligible locations with fiber to the premise service. ([PSC REF#: 543172.](#))

Round Two of the BEAD sub-granting selection process began on May 8, 2025 ([PSC REF#: 545441](#)). In Round Two the Commission received 259 new and amended applications for consideration, which, combined with the preliminary awards, would have reached 98 percent of the BEAD eligible locations. ([PSC REF#: 548588.](#)) Based on the original scoring rubric in the Initial Proposal Volume II, combining the highest-scoring proposals in Round 2 with preliminary awards in Round 1 would have resulted in award recommendations to the Commission of \$932 million to build 186,480 locations. The planned awards under Round One and Two would have deployed fiber to the premises service to 99.3 percent (185,163) of these locations at an average cost of \$5,004 per location. On June 13, to comply with the policy notice, the Commission rescinded these awards ([PSC REF#: 549468](#)).

### **Revised Implementation Under the Policy Notice**

As a condition for the release of any BEAD deployment funding, NTIA required the Commission to submit an amendment to their Initial Proposal Volume 2 to incorporate the guidance created by the policy notice. Per the requirements in the policy notice, Commission staff submitted an Initial Proposal Modification Request letter to NTIA on June 19, 2025. NTIA approved the Initial Proposal Modification request on June 26, 2025.

The policy notice required Commission staff to design and administer the BEAD BOB grant round after rescinding previous BEAD preliminary awards. Further, it halted all previously approved non-deployment activities, which included Wisconsin's planning grants and broadband

workforce training initiatives. The policy notice required all states to complete the BEAD BOB grant round within 90 days of the notice date, through a process that included completing a revised LOI process, revalidating all eligible location data, updating the scoring and program requirements to comply with the new rules, soliciting and reviewing applications, negotiation to ensure any remaining locations for which applications were not received were funded, a public comment period, formal pre-submission presentation to NTIA, award decisions by the Commission, and completion and submission of the Final Proposal which summarizes this process and includes detailed data for review.

The policy notice eliminated many requirements previously detailed in the NOFO, many of which were incorporated into Wisconsin's previous sub-grantee selection process. While statutory requirements remain unchanged, the policy notice eliminated the following non-statutory components of the BEAD program:

- Local coordination and stakeholder engagement requirements<sup>7</sup>
- Certain components of Low-Cost Service Option requirement and the Middle-Class Affordability Plan requirement<sup>8</sup>
- Fair Labor Practices and Highly Skilled Workforce, Advancing Equitable Workforce Development and Job Quality Objectives, Contracting with Small and Minority Businesses, Women's Business Enterprises, Labor Surplus Area Firms, and Civil Rights and Nondiscrimination Law Compliance<sup>9</sup>
- Climate resilience requirements<sup>10</sup>

---

<sup>7</sup> NOFO, pgs. 31; 47; 51-56; 68-69.

<sup>8</sup> NOFO, pgs. 32; 48; 66-68.

<sup>9</sup> NOFO, pgs. 32; 48; 56-62; 88-92.

<sup>10</sup> NOFO, pgs. 62-64.

- Open access and net neutrality requirements<sup>11</sup>
- Non-traditional broadband providers requirement<sup>12</sup>

The policy notice required states to overhaul their subgrantee selection process and eliminate scoring categories that had been included in Wisconsin's initial scoring rubric related to affordability, local endorsement and engagement, fair labor practices, and quality of the design and resulting performance of the network. Instead, BEAD BOB scoring is based primarily on the minimum BEAD funding required for each location for any technology that can demonstrate it will provide service that meets the BEAD technical requirements, generally 100 Mbps download and 20 Mbps upload, with low latency. In circumstances where multiple offers for the same area are within 15 percent of the lowest cost per location proposal received, specified secondary scoring criteria may be considered to further evaluate the competing applications. The only allowable secondary scoring criteria are speed to deployment, speed of network and other technical capabilities, and whether a subgrantee had been preliminary awarded for the relevant locations prior to the policy notice.

Under the previous BEAD requirements, three levels of preference were given to projects based on their proposed technology – applications with 100 percent fiber technology were considered priority, licensed fixed wireless technology were non-priority, and unlicensed fixed wireless and satellite technology projects were alternative technology projects. Under this approach, fiber projects were selected as long as they were not excessively high cost per location and were affordable within the overall BEAD allocation to the state while still meeting the universal service goal. The policy notice rescinded the preference for fiber technology in favor

---

<sup>11</sup> NOFO, pgs. 66-69.

<sup>12</sup> NOFO, pgs. 47-51.

of a broader range of technologies that can also meet the baseline statutory requirement of 100 Mbps download and 20 Mbps upload and latency less than 100 milliseconds, whether or not they maintain the technical characteristics and capabilities of fiber that provides the highest combination of reliable download and upload speeds and lowest possible latency.

Under the revised policy notice, a project is determined to be “priority” if it can meet the statutory requirements that: (1) broadband services meet the statutory minimum speed of 100/20 Mbps and latency less than or equal to 100 milliseconds; (2) the network built by the project 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.<sup>13</sup> The statutory criteria means that any deployment design that can meet both the capacity and scalability requirements is considered a priority project, and any other deployment proposals that can only meet the capacity requirements are still eligible but considered nonpriority. Thus, the ability for a project’s design to scale over time differentiates a priority project over a nonpriority project. In determining if a project can meet the capacity and scalability requirements, the updated guidance requires states to evaluate the proposed design characteristics of a project on a case-by-case basis, specific to the geography, location density, and other project-specific design and technology choices particular to the locations being served.

### **Location Eligibility**

The policy notice required updates to the list of locations eligible for BEAD funding. First, states were required to include locations no longer served due to a default or change in service area of a federal enforceable commitment. This requirement did not impact Wisconsin

---

<sup>13</sup> 47 U.S.C. §1702(a)(2)(I).

and did not result in any change to its eligible location count. Second, the policy notice requires states to optimize BEAD locations by making ineligible locations that can be anticipated not to require BEAD funding based on data updates that have occurred since the initial location count was determined. Updates include removing locations where current data indicates that qualifying service now exists at the location, that the location is served by certain unlicensed fixed wireless services that demonstrate technical capacity to the Commission, that other in-progress grants are now planned to serve the location, or that the location no longer exists, which may include cases where a location previously identified as a home has been clarified to be another non-eligible type of location (such as a grain silo or a barn). Commission staff conducted the required unlicensed fixed wireless certification process, removed other already-served locations, and made other adjustments to optimize BEAD locations per the policy notice prior to the opening of the BOB round. ([PSC REF#: 552903](#)). These modifications had the effect of reducing the eligible location count in Wisconsin from 206,715 to 174,816. Commission staff also updated the list of BEAD eligible Community Anchor Institutions (CAIs) in accordance with the policy notice requirements ([PSC REF#: 550834](#)).

### **Letter of Intent Prequalification**

The policy notice required that the LOI process be reopened before implementation of the BEAD BOB grant round. The Commission opened the BEAD BOB LOI round from June 17 to June 30, 2025 ([PSC REF#: 549658](#)) and any eligible entity was invited to apply, including entities that were denied in the first LOI round ([PSC REF#: 549648](#)). Previously approved LOI applicants were not required to submit a new LOI but had the opportunity to amend their previous submission.

The LOI process evaluated entities on their overall technical, financial, operational, and managerial capacity to construct new broadband service under the BEAD program. These criteria are laid out under BEAD program rules and were established to ensure that any awarded funding is successfully deployed. These rules were established by the federal government in the context of experience with other recent broadband programs, most notably the Federal Communications Commission's Rural Digital Opportunity Fund (RDOF), which required less stringent prequalification reviews. While RDOF initially awarded \$374 million to support 240,500 locations across Wisconsin, \$210 million supporting 91,000 locations has since been rescinded, primarily due to bids by participants that did not match the capacity for the entity to construct service.

The prequalification review of the technical, financial, operational, and managerial capacity of entities under program rules was evaluated relative to the overall number of locations the entity proposed to apply for. Applicants were required to demonstrate both their financial capacity and capability and provide documentation of their financial position, cash flow, and financial management. Applicants were required to show existing expertise within the leadership team or a plan to have a qualified contractor with skills specific to telecommunications operations, network engineering, and design practices that are shown to perform. Entities in certain circumstances were required to submit additional information through a curing process, or subject to conditional approvals that required additional steps to ensure compliance with the criteria outlined in Volume 2. If an entity failed to provide sufficient information after multiple requests, a decision was made based on the available data to establish the number of locations for which the entity could apply and limit the number of locations if available information did not clearly demonstrate the capacity to implement projects on a larger

scale. The table below shows the approved count of locations by entity, which reflects the entity's initially requested count, revised as necessary based on the capacity determination.

There was a total of 41 entities that were ultimately approved through the LOI process, which included initial approvals from the initial LOI process in 2024, revised approvals of initial requests during the BEAD BOB, and nine approvals of new LOIs submitted during the reopened BEAD BOB period. ([PSC REF#: 554322](#)). One amendment request from a previously approved entity was denied ([PSC REF#: 551774](#)), and one new submission was denied due to the applicant not meeting the capacity criteria required to participate in the BEAD program ([PSC REF#: 553108](#)).

***Table 1 Entities Approved through the Letter of Intent Processes***

| Entity  | DBA   | LOI Approval Letter  | Approved Count of Locations |
|---|---|--|-----------------------------|
| 24-7 Telecom, Inc.  |   | <a href="#">PSC REF#: 523956</a>   | 630                         |
| AMG Technology Investment Group, LLC                      | Nextlink Internet                           | <a href="#">PSC REF#: 524155</a>   | 16,642                      |
| Bad River Band of Lake Superior Tribe of Chippewa Indians | Superior Connections                        | <a href="#">PSC REF#: 527849</a>   | 2,200                       |
| Bertram Communications LLC                                |   | <a href="#">PSC REF#: 526151</a>   | 55,000                      |
| Bruce Telephone Company LLC                               |   | <a href="#">PSC REF#: 521657</a>   | 601                         |
| Citizens Telephone Cooperative, Inc./Ntera                |   | <a href="#">PSC REF#: 553105</a><br><a href="#">PSC REF#: 523288</a>                                     | 2,600                       |
| City of Superior  |   | <a href="#">PSC REF#: 522846</a>   | 200                         |
| Cochrane Cooperative Telephone Company                    |   | <a href="#">PSC REF#: 522513</a>   | 4,309                       |
| Comcast Cable Communications                              | Comcastfi, Xfinityfi,<br>Comcast Businessfi | <a href="#">PSC REF#: 522919</a>   | 4,232                       |
| Connect Holding II LLC                                    | Brightspeed                                 | <a href="#">PSC REF#: 524373</a>   | 98,102                      |
| Country Wireless, LLC                                     |   | <a href="#">PSC REF#: 553303</a>   | 2,500                       |
| CTC Telecom   | Mosaic Technologies                         | <a href="#">PSC REF#: 522197</a>   | 31,382                      |
| Earthlink, LLC  |   | <a href="#">PSC REF#: 541533</a>   | 7,444                       |
| East Central Energy                                       | ECE Fiber                                   | <a href="#">PSC REF#: 522198</a>   | 3,850                       |
| Edge Broadband LLC  |   | <a href="#">PSC REF#: 552906</a>   | 4,500                       |
| Frontier North Inc.                                       | Frontier                                    | <a href="#">PSC REF#: 525125</a>   | 74,576                      |
| Hilbert Communications LLC                                | Bug Tussel Wireless LLC                     | <a href="#">PSC REF#: 527442</a>   | 70,662                      |
| Hillsboro Telephone Company                               |   | <a href="#">PSC REF#: 552856</a>   | 770                         |
| IBT Group USA LLC   |   | <a href="#">PSC REF#: 523217</a>   | 11,352                      |
| La Valle Telephone Coop/Richland Grant Telephone Coop     |   | <a href="#">PSC REF#: 523817</a><br><a href="#">PSC REF#: 521967</a><br><a href="#">PSC REF#: 528563</a> | 14,766                      |
| Lac du Flambeau Band of Lake Superior Chippewa Indians    |   | <a href="#">PSC REF#: 544411</a>   | 1,200                       |
| Lakeland Communications Group, LLC                        |   | <a href="#">PSC REF#: 552573</a>   | 620                         |

| Entity                                  | DBA                  | LOI Approval Letter  | Approved Count of Locations |
|---|----------------------|--|-----------------------------|
| Lemonweir Valley Telephone Company      | Lynxx Networks       | <a href="#">PSC REF#: 522002</a>                                     | 6,000                       |
| Marquette-Adams Telephone Cooperative   |                      | <a href="#">PSC REF#: 522423</a>                                     | 1,170                       |
| Mediacom LLC                            |                      | <a href="#">PSC REF#: 521658</a>                                     | 13,767                      |
| Midcontinent Communications             | Midco                | <a href="#">PSC REF#: 525038</a>                                     | 3,826                       |
| Mount Horeb Telephone Company           | MHTC                 | <a href="#">PSC REF#: 521675</a><br><a href="#">PSC REF#: 550964</a> | 7,249                       |
| NEIT Broadband, LLC                     | NEIT                 | <a href="#">PSC REF#: 523957</a>                                     | 1,500                       |
| NET LEC, LLC                            | Nsight               | <a href="#">PSC REF#: 523541</a>                                     | 18,639                      |
| Norvado, Inc.                           |                      | <a href="#">PSC REF#: 521659</a>                                     | 17,289                      |
| Pierce Pepin Cooperative                | SwiftCurrent Connect | <a href="#">PSC REF#: 521966</a>                                     | 10,322                      |
| Sokaogon Chippewa Tribe                 |                      | <a href="#">PSC REF#: 528353</a>                                     | 4,836                       |
| Space Exploration Technologies Corp.    | SpaceX               | <a href="#">PSC REF#: 553130</a>                                     | 35,000                      |
| Spectrum Mid-America LLC                | Spectrum / Charter   | <a href="#">PSC REF#: 526343</a>                                     | 206,397                     |
| St. Croix Chippewa Indians of Wisconsin |                      | <a href="#">PSC REF#: 553207</a>                                     | 71                          |
| Surf Air Wireless                       | Surf Internet        | <a href="#">PSC REF#: 522847</a>                                     | 14,102                      |
| USCC Services, LLC                      | US Cellular          | <a href="#">PSC REF#: 523146</a>                                     | 59,370                      |
| Vernon Communications Cooperative       |                      | <a href="#">PSC REF#: 552607</a>                                     | 5,895                       |
| Waypoint Experts, LLC                   | Bayfield Wireless    | <a href="#">PSC REF#: 552857</a>                                     | 1,050                       |
| Wisconsin Bell, LLC                     | AT&T                 | <a href="#">PSC REF#: 523899</a>                                     | 19,380                      |
| Wittenberg Telephone Company Inc.       | Cirrinity LLC        | <a href="#">PSC REF#: 552574</a>                                     | 2,698                       |

## Application Solicitation

The Commission's BEAD Grant Award Management Platform originally designed for the previous BEAD sub granting process was adjusted to reflect the updates to the application process. Commission staff compiled new application questions that aligned with requirements set forth in the policy notice and published updated guidance documents and technical support for eligible applicants. ([PSC REF#: 554551](#), [PSC REF#: 554421](#).)

Commission staff also created a priority broadband project template and instructions for completing the template ([PSC REF#: 554516](#), [PSC REF#: 554544](#)). A complete, project specific template was required for each project seeking priority treatment. The priority broadband project template required extensive detail on each proposed project design. These details allowed staff to evaluate each submission in the context of each project's on-the-ground design implementation and to focus on the project area and locations proposed to be served.



The BEAD BOB grant round opened Thursday, July 17, 2025 and closed on July 28, 2025, at 4:59 p.m. CT ([PSC REF#: 556613](#)). Due to the timeline required by the policy notice for final submission of proposed awards, the application round was open for 11 days in order to allow Commission staff the required time to review the application submissions, including the additional required review for each project seeking treatment as a priority broadband project and ensure sufficient remaining time for negotiations following the close of the round. The negotiation process in particular required staff to quickly analyze remaining locations against multiple existing datasets and make offers to eligible providers to achieve universal coverage through the completion of the BEAD preliminary awarding process. Given the shortened timeline, applicants were not provided the opportunity to cure applications that were incomplete due to missing data or incomplete responses. Commission staff provided webinars, BEAD office hours, and guidance documents before the application deadline to help eligible applicants ensure their application submissions were complete. ([PSC REF#: 554551](#)). Of the 41 entities with approved LOIs, 33 submitted applications in the BEAD BOB round. As shown in Table 2, the Commission received 411 applications requesting a total of \$2,161,095,718 in funds with all BEAD eligible locations included in at least one application.

***Table 2 Summary of BEAD BOB Applications Received***

| <b>Applicant</b>                                | <b>Total BEAD Funds requested</b> | <b>Total Applications Submitted</b> | <b>Total BSLs Included in Applications</b> |
|---|-----------------------------------|-------------------------------------|--|
| AMG Technology Investment Group, LLC            | \$2,660,673                       | 4                                   | 3,063                                      |
| Bertram Communications LLC                      | \$741,416,865                     | 30                                  | 127,966                                    |
| Bug Tussel/Hilbert Communications               | \$166,426,948                     | 31                                  | 47,940                                     |
| Citizens Telephone Cooperative, Inc./Ntera, LLC | \$3,887,149                       | 1                                   | 709  |
| City of Superior                                | \$6,464,000                       | 2                                   | 165  |
| Cochrane Cooperative Telephone Company          | \$3,388,442                       | 3                                   | 309  |
| Comcast Cable Communications Management LLC     | \$20,415,604                      | 3                                   | 1,978                                      |
| Connect Holding II LLC                          | \$155,577,073                     | 69                                  | 49,296                                     |

| <b>Applicant</b>   | <b>Total BEAD Funds requested</b> | <b>Total Applications Submitted</b> | <b>Total BSLs Included in Applications</b> |
|--|-----------------------------------|-------------------------------------|--|
| Country Wireless   | \$2,244,389                       | 2                                   | 2,220                                      |
| CTC Telcom Inc.  | \$292,940,887                     | 9                                   | 52,573                                     |
| East Central Energy  | \$8,022,637                       | 1                                   | 2,401                                      |
| Edge Broadband LLC   | \$2,774,032                       | 11                                  | 2,206                                      |
| Frontier North Inc.  | \$123,084,589                     | 29                                  | 14,934                                     |
| Hillsboro Telephone Company, Inc.                          | \$900,492                         | 1                                   | 45   |
| IBT Group USA LLC  | \$18,418,503                      | 2                                   | 16,113                                     |
| La Valle Telephone Coop/Richland Grant Telephone Coop      | \$15,234,750                      | 37                                  | 2,759                                      |
| Lac du Flambeau Band of the Lake Superior Chippewa Indians | \$7,319,123                       | 1                                   | 921  |
| Lakeland Communications Group, LLC                         | \$1,749,699                       | 2                                   | 557  |
| Lemonweir Valley Telephone Company                         | \$52,162,800                      | 23                                  | 6,329                                      |
| Marquette-Adams Telephone Cooperative                      | \$9,166,757                       | 10                                  | 976  |
| Mount Horeb Telephone Company                              | \$5,637,131                       | 3                                   | 2,752                                      |
| NEIT Broadband LLC   | \$17,838,773                      | 2                                   | 1,851                                      |
| NET LEC LLC.   | \$1,948,672                       | 11                                  | 4,549                                      |
| Norvado Inc.   | \$38,532,623                      | 20                                  | 10,754                                     |
| Pierce Pepin Cooperative Services                          | \$45,471,789                      | 5                                   | 12,262                                     |
| Sokaogon Chippewa Tribe                                    | \$72,460,850                      | 1                                   | 4,455                                      |
| Space Exploration Technologies, Corp                       | \$291,397,250                     | 73                                  | 194,251                                    |
| Spectrum Mid-America LLC                                   | \$29,596,506                      | 7                                   | 6,873                                      |
| St. Croix Chippewa Indians of Wisconsin                    | \$853,526                         | 1                                   | 148  |
| Vernon Communications Cooperative                          | \$11,359,121                      | 1                                   | 3,619                                      |
| Waypoint Experts   | \$1,446,037                       | 3                                   | 561  |
| Wisconsin Bell LLC dba AT&T Wisconsin                      | \$8,277,749                       | 11                                  | 1,853                                      |
| Wittenberg Telephone Company Inc. DBA Cirrinity            | \$2,020,279                       | 2                                   | 1,249                                      |
|  | <b>\$2,161,095,718</b>            | <b>411</b>                          | <b>578,637</b>                             |

### **Noncompliance with LOI Approval**

As approved in Wisconsin's Initial Proposal Volume 2, approval of an LOI established a total maximum number of unique locations applicants could include on their respective applications, based on their evaluated LOI submission for overall technical, financial, operational, and managerial capacity to construct new broadband service under the BEAD program. Of the 33 total applicants in the BEAD BOB round, three applied for a number of

locations exceeding the number of locations they were approved for in their letter of intent. Each time an applicant attempted to submit an application over their limit, the BEAD Award Platform displayed a warning to the applicant that they were over their limit and needed to retract some applications. The application instructions, and the methodology and rules document, provided to applicants stated that the Commission “will unilaterally disqualify applications” that exceed the applicant’s approved BSL count. ([PSC REF#: 552269](#) at 3; [PSC REF#: 554421](#) at 11-12.)

Consistent with this statement, applications from Bertram Communications LLC, IBT Group USA LLC, and Space Exploration Technologies, Corp (SpaceX) that caused those applicants to exceed their approved limit were unilaterally disqualified.

## **Tribal Consent**

It is the policy of the State of Wisconsin, as established in the Governor’s Executive Order 18<sup>14</sup> and the Consultation Policy of the Public Service Commission,<sup>15</sup> to engage with the eleven federally-recognized Tribal Governments in Wisconsin through regular consultation to ensure their interests are represented and respected throughout the administration of the Commission’s programs. Consistent with this policy, the Commission holds regular consultations with Tribal leaders, shares regular updates to Tribal leaders on broadband deployment progress, and provides technical assistance to Tribes upon request related to broadband deployment matters.

As part of this effort, and consistent with BEAD program rules, the Commission requires that consent is provided for any BEAD deployment affecting Tribal lands.<sup>16</sup> Thus, any applicant proposing to provide BEAD-funded service must demonstrate, at a minimum, ongoing

---

<sup>14</sup> [April 9, 2019, Evers Executive Order #18](#)

<sup>15</sup> <https://witribes.wi.gov/docview.asp?docid=29104&locid=57>

<sup>16</sup> BEAD FAQ, see 2.16, pg. 28 [https://broadbandusa.ntia.gov/sites/default/files/2025-08/BEAD\\_FAQs\\_v14.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-08/BEAD_FAQs_v14.pdf)

consultation and progress towards consent with a Tribal Nation in order to be considered for a funding award in the area. NTIA requires final, formalized consent in the form of a Resolution of Consent passed by the applicable Tribal governing body before any deployment may take place. If an applicant did not provide a resolution of consent, or documentation demonstrating steps being taken to obtain consent, a project was determined to be ineligible for BEAD funding and disqualified. Acceptable documentation detailing the steps to obtain consent included correspondence, descriptions of meetings or other outreach and engagement, permitting documentation, or letters from Tribal leaders.

The following applicants provided acceptable consent documentation related to proposed BEAD projects that would provide service on Tribal lands: Lac du Flambeau Band of Lake Superior Chippewa, Sokaogon Chippewa Tribe, St. Croix Chippewa Indians of Wisconsin, Lakeland Communications Group, Lemonweir Valley Telephone Company, and Pierce Pepin Cooperative Services. SpaceX applied for funding for service across all available Tribal locations. However, in its provided documentation, SpaceX contends that because its satellite-based service does not require construction on Tribal lands, no consent is required. Commission staff sought technical assistance from NTIA, which confirmed that Tribal consent is required for any BEAD deployment to a Tribal location, regardless of the method of deployment or potential construction impact. Consistent with this guidance, SpaceX's consent documentation was rejected, and these applications were disqualified.

### **Priority Project Determinations**

As noted above, under the policy notice, a project is determined to be “priority” if it can meet the statutory requirements that: (1) broadband services must meet the statutory minimum speeds of 100/20 Mbps and latency less than or equal to 100 milliseconds; (2) ensure that the

network built by the project 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.<sup>17</sup> The ability for a project's design to scale over time differentiates a priority project over a nonpriority project. In determining if a project can meet the capacity and scalability requirements, the updated guidance requires states to evaluate the proposed design characteristics of a project on a case-by-case basis, specific to the geography, density, and other project-specific design choices particular to the locations being served. Further, NTIA has provided guidance in evaluating the scalability of a project to meet the evolving connectivity needs of households and businesses, and support the deployment of 5G, successor wireless technologies, and other advanced services. The guidance states that it is reasonable to consider (1) natural and physical features of a project area, such as tree cover and weather patterns, when determining the suitability of a proposed project: and (2) project area density and the concentration of BSLs in a project area that may make certain applications nonpriority due to lack of scalability.<sup>18</sup>

After excluding applications that were removed from consideration for exceeding their approved Letter of Intent location total or for not obtaining Tribal consent, 350 applications were evaluated for priority status. For each application, entities indicated if they were seeking Priority Broadband Project Status. If yes, they were required to upload the provided template ([PSC REF#: 554544](#)). Applicants that did not request priority status were asked to provide a detailed narrative response about the proposed network design but did not have to upload

---

<sup>17</sup> 47 U.S.C. §1702(a)(2)(I).

<sup>18</sup> [BEAD: Frequently Asked Questions and Answers Version 13](#), see 3.22, pg. 42.

additional documentation. In total, seven applications did not request priority status and were thus automatically assigned nonpriority status.

The remaining applications sought priority status and were rigorously reviewed on an individual project basis. Templates asked project-specific questions that sought to understand the unique on-the-ground characteristics of a given project deployment. In proposing a project as priority, the burden of proof was placed upon the applicant to explain the technology, including its existing performance and future expected scalability.

The review process occurred in two phases. The first phase involved evaluating the information and specifications provided by the applicant within their template to review if the proposed network would perform as indicated in the application. The review considered the number of proposed customers, backhaul capacity, spectrum utilization, interference mitigation, network management best practices, and other equipment and configuration information to evaluate if the project could consistently provide 100/20 Mbps with low latency to each BEAD location and would easily scale. These determinations were based on the detailed technical capabilities as provided by the applicant and validated by experienced outside contractors, including network engineers, to ensure the proposed design was reasonable and commensurate with the locations planned to be served.

The second phase of the review evaluated the project's ability to easily scale speeds over time, the key requirement to a determination of priority status. This analysis was again based on the details provided by the applicant and validated by staff and contracted experts. Staff note that some applications did not consistently provide information that contemplated the specific geography and density characteristics of their project as required by NTIA guidance. Where possible, staff utilized the information that was provided in a template, but pursuant to the terms

outlined in the template instructions, templates that were submitted with missing, incomplete, or insufficient information were determined to be non-priority projects ([PSC REF#: 554544](#)).

It is reasonable to anticipate that many proposed networks may scale speeds beyond their initial deployment. However, it is difficult to evaluate the future possible increased performance of a network if an applicant does not provide projections about the scalability of the network it proposes. If an application did not provide details that were specific to justify compliance with scalability requirements laid out by NTIA, staff made determinations based on the technical information that was provided in the template and the existing demonstrated performance of the proposed network configuration as a ceiling for the proposed scalable speed of the project. For example, SpaceX did not provide any information in the priority template on the tab “Performance and Scalability.” Since this information was not provided by the applicant, it could not be taken into account by Commission staff and external experts in conducting their review and making priority determinations.

In addition to the provided information from project templates, staff consulted with contracted experts to incorporate NTIA’s guidance related to geography and density of locations in making determinations of priority status. For example, due to the spectrum used to serve a customer in a given area for fixed wireless technologies, there are physical limits to the number of customers that can connect to a radio based on how many megahertz (MHz) are dedicated to each channel and the parameters in place to dynamically allocate that spectrum between customers. Staff also reviewed the specific equipment that was listed on an application and confirmed that the listed equipment was planned to be used as specified by the manufacturer. Staff used multiple methods of location density analysis to determine project areas that had a higher location density to ensure the capacity and scalability calculations were commensurate

with the on-the-ground realities of the locations proposed to be served. Similarly, staff worked with outside contractors to apply two different methodologies for analyzing tree coverage, applying the findings to the proposed project areas to ensure the proposed network designs sufficiently accounted for these geographic features. Table 5 summarizes the applicants and their respective applications' priority and nonpriority determinations.

***Table 3 Summary of Application Priority Status Determinations***

| <b>Applicant</b>   | <b>Priority Application Count</b> | <b>Nonpriority Application Count</b> | <b>Total Application Count</b> |
|--|-----------------------------------|--------------------------------------|--------------------------------|
| AMG Technology Investment Group, LLC                       | 3                                 | 1                                    | 4                              |
| Bertram Communications LLC                                 | 22                                |                                      | 22                             |
| Bug Tussel/Hilbert Communications                          | 26                                | 5                                    | 31                             |
| Citizens Telephone Cooperative, Inc./Ntera, LLC            | 1                                 |                                      | 1                              |
| City of Superior   | 2                                 |                                      | 2                              |
| Cochrane Cooperative Telephone Company                     | 3                                 |                                      | 3                              |
| Comcast Cable Communications Management LLC                | 3                                 |                                      | 3                              |
| Connect Holding II LLC                                     | 69                                |                                      | 69                             |
| Country Wireless   |                                   | 2                                    | 2                              |
| CTC Telcom Inc.  | 9                                 |                                      | 9                              |
| East Central Energy  | 1                                 |                                      | 1                              |
| Edge Broadband LLC   | 11                                |                                      | 11                             |
| Frontier North Inc.  | 29                                |                                      | 29                             |
| Hillsboro Telephone Company, Inc.                          | 1                                 |                                      | 1                              |
| IBT Group USA LLC  |                                   | 1                                    | 1                              |
| La Valle Telephone Coop/Richland Grant Telephone Coop      | 37                                |                                      | 37                             |
| Lac du Flambeau Band of the Lake Superior Chippewa Indians | 1                                 |                                      | 1                              |
| Lakeland Communications Group, LLC                         | 1                                 | 1                                    | 2                              |
| Lemonweir Valley Telephone Company                         | 23                                |                                      | 23                             |
| Marquette-Adams Telephone Cooperative                      | 7                                 | 3                                    | 10                             |



| <b>Applicant</b>                                   | <b>Priority Application Count</b> | <b>Nonpriority Application Count</b> | <b>Total Application Count</b> |
|--|-----------------------------------|--------------------------------------|--------------------------------|
| Mount Horeb Telephone Company                      | 2                                 | 1                                    | 3                              |
| NEIT Broadband LLC                                 | 2                                 |                                      | 2                              |
| NET LEC LLC.                                       | 8                                 | 3                                    | 11                             |
| Norvado Inc.                                       | 20                                |                                      | 20                             |
| Pierce Pepin Cooperative Services                  | 3                                 | 2                                    | 5                              |
| Sokaogon Chippewa Tribe                            | 1                                 |                                      | 1                              |
| Space Exploration Technologies, Corp               | 10                                | 11                                   | 21                             |
| Spectrum Mid-America LLC                           | 7                                 |                                      | 7                              |
| St. Croix Chippewa Indians of Wisconsin            |                                   | 1                                    | 1                              |
| Vernon Communications Cooperative                  | 1                                 |                                      | 1                              |
| Waypoint Experts                                   | 3                                 |                                      | 3                              |
| Wisconsin Bell LLC dba AT&T Wisconsin              | 11                                |                                      | 11                             |
| WITTENBERG TELEPHONE COMPANY INC. DBA CIRINITY LLC | 2                                 |                                      | 2                              |
|  | <b>319</b>                        | <b>31</b>                            | <b>350</b>                     |

### Low-Cost Service Option

The BEAD NOFO required all entities applying for and receiving BEAD funds to provide a low-cost service option (LCSO) to qualified customers receiving service at a BEAD-funded location. The NOFO further specified that eligibility to enroll in a low-cost plan was to be determined using the Affordable Connectivity Program (ACP)<sup>19</sup> eligibility criteria, generally those with incomes at or below 200 percent of the federal poverty line or participating in one of several federally funded assistance programs. This requirement was established to ensure that customers are able to access networks supported by and built with public funding. A low-cost

---

<sup>19</sup> ACP was a program operated by the Federal Communications Commission that has now been discontinued. See <https://www.fcc.gov/acp> for more information.

plan price that is too high could serve as a barrier to some customers connecting to the internet, reducing subscribers and preventing taxpayers who financed the investment from accessing its benefits. Wisconsin's Initial Proposal Volume 2, as initially approved by NTIA based on the terms of the NOFO, required that the low-cost service offer be no more than \$40 per month for a plan of at least 100/20 Mbps

The policy notice prohibited states from establishing a maximum monthly rate for the LCSO, superseding the NOFO and requiring that states accept the proposed LCSO of the applicant. The policy notice also reduced LCSO eligibility to the equivalent of the federal Lifeline program, or generally households with incomes at or below 135 percent of the federal poverty line. The rate and terms indicated by the provider will be included in their grant agreement and monitored by staff throughout the federal interest period, but the policy notice prohibits the Commission from modifying or approving proposed rates. Per the terms of the policy notice, LCSO responses were also not allowed to be considered in scoring or awarding BEAD applications.

Table 4 shows the range of LCSO monthly rates proposed by applicants. Edge Broadband submitted the lowest LCSO set at \$29 per month. There were nine applicant entities that set their LCSO at or below the \$40 per month threshold initially established by Wisconsin's Initial Proposal. There were eight applicants – Hillsboro Telephone Company, Inc., Marquette-Adams Telephone Cooperative, Cochrane Cooperative Telephone Company, Space Exploration Technologies, Corp, St. Croix Chippewa Indians of Wisconsin, Lakeland Communications Group, LLC, Country Wireless, and Norvado, Inc. – that set the LCSO at \$70 per month or higher, \$30 per month greater than the initially proposed threshold.

**Table 4 Applicant's Submitted Low-Cost Service Option**

| Actual monthly subscriber cost of LCSO by technology and provider (including fees, taxes and charges for the first 12 months of service) |                        |                           |
|--|------------------------|---------------------------|
| <b>Applicant Name</b>  | <b>Technology Type</b> | <b>LCSO Monthly Price</b> |
| Edge Broadband LLC   | Fiber                  | \$29                      |
| Bertram Communications LLC   | Fiber                  | \$30                      |
| Comcast Cable Communications Management LLC  | Fiber                  | \$30                      |
| Frontier North Inc   | Fiber                  | \$30                      |
| NET LEC LLC  | Fiber                  | \$35                      |
| Wisconsin Bell LLC dba AT&T Wisconsin  | Fiber                  | \$35                      |
| Citizens Telephone Cooperative, Inc./Ntera, LLC  | Fiber                  | \$40                      |
| Lemonweir Valley Telephone Company   | Fiber                  | \$40                      |
| NEIT Broadband LLC   | Fiber                  | \$40                      |
| Bug Tussel/Hilbert Communications  | Fiber, Fixed Wireless  | \$45                      |
| City of Superior   | Fiber                  | \$45                      |
| Mount Horeb Telephone Company  | Fixed Wireless         | \$46                      |
| Connect Holding  | Fiber                  | \$49                      |
| NET LEC LLC  | Fixed Wireless         | \$49                      |
| Pierce Pepin Cooperative Services  | Fiber                  | \$49                      |
| Spectrum Mid-America LLC   | Fiber                  | \$50                      |
| Waypoint Experts   | Fixed Wireless         | \$50                      |
| Lac du Flambeau Band of the Lake Superior Chippewa Indians   | Fiber                  | \$58                      |
| IBT Group USA LLC  | Fixed Wireless         | \$59                      |
| Pierce Pepin Cooperative Services  | Fiber                  | \$59                      |
| Sokaogon Chippewa Tribe  | Fiber                  | \$60                      |
| La Valle Telephone Coop/Richland Grant Telephone Coop  | Fiber                  | \$63                      |
| AMG Technology Investment Group, LLC   | Fixed Wireless         | \$65                      |
| CTC Telcom Inc.  | Fiber                  | \$65                      |
| Wittenberg Telephone Company Inc. DBA Cirrinity LLC  | Fixed Wireless         | \$50                      |
| East Central Energy  | Fiber                  | \$65                      |
| Vernon Communications Cooperative  | Fiber                  | \$65                      |
| Hillsboro Telephone Company, Inc.  | Fiber                  | \$70                      |
| Marquette-Adams Telephone Cooperative  | Fiber                  | \$70                      |
| Cochrane Cooperative Telephone Company   | Fiber                  | \$80                      |
| Space Exploration Technologies, Corp   | LEO Satellite          | \$80                      |
| St. Croix Chippewa Indians of Wisconsin  | Fiber                  | \$84                      |
| Lakeland Communications Group, LLC   | Fiber                  | \$85                      |
| Norvado Inc.   | Fiber                  | \$85                      |
| Country Wireless   | Fixed Wireless         | \$700                     |

Applicants were asked further questions regarding additional fees, data usage caps, and future cost increases. Mount Horeb Telephone Company, NET LEC LCC, Waypoint Experts, and Wisconsin Bell LLC dba AT&T Wisconsin all said they would add additional fees of non-recurring cost to the LCSO. Reasons for the additional fees included installation and activation

as well as payment fees related to billing, returned checks, restarting services, and non-return of equipment. When asked if the LCSO will increase in cost more than the Consumer Price Index annually, Comcast Cable Communications Management, LLC, Spectrum Mid-America LLC, and Wisconsin Bell dba AT&T Wisconsin all responded yes. Explanations for the increase included that additional taxes and fees may apply, marketplace conditions may impact costs, and standard business practices that are consistent with the FCC's standard for its high-cost funding recipients. No applicant will have data usage caps for subscribers.

### **Nondeployment Funds**

NTIA had initially approved Wisconsin's use of funds for non-deployment activities in the Initial Proposal Volume 2. Commission staff worked with stakeholders across Wisconsin to plan nondeployment activities. Consistent with the BEAD NOFO,<sup>20</sup> as part of the Initial Proposal, the Commission had approved plans to use nondeployment funds to increase broadband adoption. Nondeployment funds were also to be used for workforce training and upskilling to alleviate workforce availability issues and decrease the overall cost of last-mile deployment projects. BEAD-related training and workforce development were meant to facilitate upskilling across the state for faster and more cost-efficient broadband deployment, to benefit Wisconsin's job growth and broadband deployment industries.

Under the policy notice, NTIA rescinded existing approvals for non-deployment uses, including Wisconsin's workforce training program partnership with the Wisconsin Technical College System. NTIA indicates it will be releasing updated guidance for nondeployment uses

---

<sup>20</sup> <https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf> at page 39. Other eligible nondeployment uses than those established in Wisconsin's Initial Proposal included training related to cybersecurity and digital safety, remote learning and telehealth access, and digital literacy and computer skills training.

of remaining unallocated BEAD funding, but no guidance has been released to date.<sup>21</sup> Absent any new guidance, prior planning efforts under the BEAD Five-Year Plan may serve as a roadmap for implementation of the many eligible non-deployment activities listed in the NOFO. These non-deployment activities remain essential to maximizing the utilization of BEAD-funded networks and to ensure that other non-infrastructure barriers to broadband use do not prevent households from participating in the society and economy of Wisconsin.

### **BEAD BOB Sub-granting and Negotiations**

#### **Competitive Preliminary Award Results**

Following Commission staff's review and validation of documentation related to Tribal Consent, and documentation submitted for projects seeking priority treatment and determinations for excessive cost per location, the validated data was loaded in the BEAD Award System to identify preliminary award determinations. The BEAD Award System deconflicted applications as it progressed through the automated scoring process – where an application overlapped with another application in whole or part that was determined to be preliminarily awarded, that application or a portion of its units, depending on how the applicant designed the project, were removed and not considered for award.

As noted above, awards were determined primarily based on the lowest cost proposal for a given location, and the priority status of the application. A secondary scoring rubric was utilized in the automated scoring process to compare projects that were within 15 percent of the lowest cost proposal:

---

<sup>21</sup> [https://broadbandusa.ntia.gov/sites/default/files/2025-08/BEAD\\_FAQs\\_v13.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-08/BEAD_FAQs_v13.pdf) at page 29 question 2.21

Speed of Network and Other Technical Capabilities (75 points): Asked the applicant to certify that the proposed technology for the application can consistently (99.5 percent of the time) and concurrently (at the same time) provide upload speeds of 1000 Mbps or 1 gigabit to at least 90 percent of the BEAD eligible locations in the proposed project area.

A “yes” response to the Speed of Network and Other Technical Capabilities question within the application resulted in the application receiving 75 points.

Preliminarily Awarded in Round One (25 points): If 100 percent of the BSLs in the submitted project application were preliminarily awarded in BEAD Round 1 to the applicant, the application received 25 points. If less than 100 percent and more than 50 percent of the BSLs in the submitted application were preliminarily awarded in Round 1 to the applicant, the application received 15 points. If at least 10 percent and up to 50 percent of the BSLs in the submitted application were preliminarily awarded in Round 1 to the applicant, the application received 10 points.

In total 45 applications went to secondary scoring criteria, and 25 applications awarding 3,900 locations were determined using the secondary scoring criteria. The remaining 183 applications that were preliminary awarded in the automated BOB subgrantee selection process were determined based on priority status and the low-cost criterion.

In total, 140,828 locations were preliminary awarded through the automated BEAD BOB subgrantee selection process. See Table 5 below for preliminary award details.

**Table 5 Applications Preliminary Awarded through Automated Grant Process**

| <b>Entity</b>  | <b>Technology</b>               | <b># of Locations</b> | <b>BEAD Funds</b> | <b>Match Funds</b> |
|--|---------------------------------|-----------------------|-------------------|--------------------|
| AMG Technology Investment Group, LLC                       | Licensed Fixed Wireless         | 1,328                 | \$1,101,223       | \$367,688          |
| Bertram Communications LLC                                 | Fiber                           | 22,151                | \$130,004,447     | \$43,340,806       |
| Bug Tussel/Hilbert Communications                          | Fiber                           | 8,791                 | \$61,866,268      | \$23,217,675       |
| Bug Tussel/Hilbert Communications                          | Unlicensed Fixed Wireless       | 16,074                | \$19,545,379      | \$6,520,194        |
| City of Superior   | Fiber                           | 5                     | \$80,001          | \$20,001           |
| Comcast Cable Communications Management LLC                | Fiber                           | 594                   | \$3,629,983       | \$5,400,364        |
| Connect Holding II LLC                                     | Fiber                           | 39,531                | \$114,017,931     | \$118,045,556      |
| Country Wireless   | Licensed by Rule Fixed Wireless | 1,085                 | \$1,017,730       | \$339,605          |
| East Central Energy  | Fiber                           | 1,940                 | \$6,582,002       | \$6,737,819        |
| Edge Broadband LLC   | Fiber                           | 1,833                 | \$2,413,896       | \$2,953,048        |
| Frontier North Inc.  | Fiber                           | 6,040                 | \$31,890,556      | \$21,905,216       |
| Hillsboro Telephone Company, Inc.                          | Fiber                           | 44                    | \$893,465         | \$297,836          |
| IBT Group USA LLC  | Licensed by Rule Fixed Wireless | 123                   | \$170,025         | \$56,727           |
| La Valle Telephone Coop / Richland Grant Telephone Coop    | Fiber                           | 711                   | \$4,944,882       | \$4,946,482        |
| Lac du Flambeau Band of the Lake Superior Chippewa Indians | Fiber                           | 921                   | \$7,319,452       | \$2,441,273        |
| Lakeland Communications Group, LLC                         | Fiber                           | 139                   | \$0               | \$0                |
| Lemonweir Valley Telephone Company                         | Fiber                           | 906                   | \$9,671,015       | \$2,211,168        |
| Marquette-Adams Telephone Cooperative                      | Fiber                           | 448                   | \$5,892,789       | \$2,971,080        |
| Mount Horeb Telephone Company                              | Mixed technology                | 29                    | \$201,347         | \$67,135           |
| NEIT Broadband LLC   | Fiber                           | 384                   | \$1,008,914       | \$2,353,704        |

| <b>Entity</b>                                      | <b>Technology</b>               | <b># of Locations</b> | <b>BEAD Funds</b>    | <b>Match Funds</b>   |
|--|---------------------------------|-----------------------|----------------------|----------------------|
| NET LEC LLC.                                       | Fiber                           | 2,121                 | \$0                  | \$2,121              |
| NET LEC LLC.                                       | Licensed Fixed Wireless         | 2,153                 | \$1,629,067          | \$2,438,566          |
| Norvado Inc.                                       | Fiber                           | 4,374                 | \$14,418,625         | \$25,176,049         |
| Pierce Pepin Cooperative Services                  | Fiber                           | 4,819                 | \$19,915,637         | \$8,126,562          |
| Sokaogon Chippewa Tribe                            | Fiber                           | 4,455                 | \$72,461,811         | \$0                  |
| Space Exploration Technologies, Corp.              | Low Earth Orbit Satellite       | 16,121                | \$24,163,950         | \$22,149,614         |
| Spectrum Mid-America LLC                           | Fiber                           | 1,221                 | \$6,335,769          | \$2,112,330          |
| Waypoint Experts                                   | Fiber                           | 26                    | \$287,274            | \$95,784             |
| Waypoint Experts                                   | Licensed Fixed Wireless         | 533                   | \$1,113,100          | \$371,255            |
| Wisconsin Bell LLC dba AT&T Wisconsin              | Fiber                           | 753                   | \$1,058,397          | \$3,752,916          |
| WITTENBERG TELEPHONE COMPANY INC. DBA CIRINITY LLC | Fiber                           | 225                   | \$732,150            | \$468,000            |
| WITTENBERG TELEPHONE COMPANY INC. DBA CIRINITY LLC | Licensed by Rule Fixed Wireless | 950                   | \$1,201,607          | \$495,429            |
|  |                                 | <b>140,828</b>        | <b>\$545,568,692</b> | <b>\$309,382,003</b> |

### *Negotiation Process and Preliminary Results*

Following the completion of the automated BEAD preliminary award process, in accordance with steps detailed in the approved Initial Proposal Volume 2 ([PSC REF#: 510388](#)), Commission staff evaluated gaps to identify locations that did not receive a preliminary award through the competitive preliminary awarding process due to deconfliction of competing and/or overlapping applications and/or due to submitted applications proposing excessive costs per



location. Commission staff identified 33,264 locations eligible for BEAD funding that did not receive preliminary awards through the automated process described above.

Commission staff took multiple approaches to pursue universal coverage, including sending negotiation offers to providers for unawarded locations that were included in their previous BEAD BOB application(s) but were not awarded due to the deconfliction of other overlapping applications and offering unawarded locations that were adjacent and/or near a provider's existing preliminary award project area or service area. Negotiations were an iterative process that necessitated engaging with multiple providers, particularly to serve unawarded locations that were the costliest and/or most challenging to serve due to geography and remote location. Commission staff secured negotiated commitments for all 33,264 locations. A total of \$144,877,100 in BEAD funding was preliminarily allocated for the negotiated locations, which encompasses all deployment technology types.

#### *Preliminary Award Recommendations*

In accordance with rules and process established under the BEAD Notice of Funding Opportunity and Wisconsin's approved Initial Proposal Volume 1 and 2, as modified by the BEAD Restructuring Policy Notice, Commission staff have determined through the Benefit of the Bargain competitive grant round and the subsequent negotiations completed per the approved Initial Proposal that the awards in Table 6 should be submitted to NTIA in the final proposal and preliminary awarded BEAD funding for their proposed broadband projects. Table 6 includes all preliminary awards identified in Table 5 and incorporates additional awards identified through the negotiation process. See Attachment 1 Recommended Awards by County and Entity for further details.

**Table 6 Recommended BEAD Funding Awards**

| <b>Entity</b>  | <b>Technology</b>                           | <b># of Locations</b> | <b>BEAD Funds</b> | <b>Match Funds</b> |
|--|---|-----------------------|-------------------|--------------------|
| AMG Technology Investment Group, LLC                       | Terrestrial Licensed Fixed Wireless         | 1,328                 | \$1,101,223       | \$367,688          |
| Bertram Communications LLC                                 | Fiber                                       | 28,903                | \$161,167,112     | \$53,730,185       |
| Bug Tussel/Hilbert Communications                          | Fiber                                       | 9,878                 | \$66,767,349      | \$25,501,481       |
| Bug Tussel/Hilbert Communications                          | Terrestrial Unlicensed Fixed Wireless       | 16,954                | \$20,922,766      | \$6,979,323        |
| City of Superior   | Fiber                                       | 5                     | \$80,001          | \$20,001           |
| Comcast Cable Communications Management LLC                | Fiber                                       | 860                   | \$5,922,848       | \$6,164,737        |
| Connect Holding II LLC                                     | Fiber                                       | 43,127                | \$133,804,282     | \$124,642,104      |
| Country Wireless   | Terrestrial Licensed by Rule Fixed Wireless | 1,085                 | \$1,017,730       | \$339,605          |
| CTC Telcom Inc.  | Fiber                                       | 6,856                 | \$35,390,428      | \$11,799,836       |
| East Central Energy  | Fiber                                       | 2,101                 | \$7,947,689       | \$7,193,085        |
| Edge Broadband LLC   | Fiber                                       | 1,900                 | \$2,712,287       | \$3,052,532        |
| Frontier North Inc.  | Fiber                                       | 6,069                 | \$31,977,705      | \$21,934,274       |
| Hillsboro Telephone Company, Inc.                          | Fiber                                       | 44                    | \$893,465         | \$297,836          |
| IBT Group USA LLC  | Terrestrial Licensed by Rule Fixed Wireless | 123                   | \$170,025         | \$56,727           |
| La Valle Telephone Coop / Richland Grant Telephone Coop    | Fiber                                       | 1,006                 | \$7,231,177       | \$5,708,692        |
| Lac du Flambeau Band of the Lake Superior Chippewa Indians | Fiber                                       | 932                   | \$7,390,616       | \$2,464,998        |
| Lakeland Communications Group, LLC                         | Fiber                                       | 474                   | \$1,569,044       | \$537,147          |
| Lemonweir Valley Telephone Company                         | Fiber                                       | 1,101                 | \$12,131,810      | \$3,031,447        |
| Marquette-Adams Telephone Cooperative                      | Fiber                                       | 470                   | \$6,018,756       | \$3,013,074        |
| Mount Horeb Telephone Company                              | Mixed technology                            | 29                    | \$201,347         | \$67,135           |
| NEIT Broadband LLC   | Fiber                                       | 391                   | \$1,048,914       | \$2,367,039        |

| <b>Entity</b>                                      | <b>Technology</b>                           | <b># of Locations</b> | <b>BEAD Funds</b>    | <b>Match Funds</b>   |
|--|---|-----------------------|----------------------|----------------------|
| NET LEC LLC.                                       | Fiber                                       | 2,689                 | \$1,687,745          | \$564,888            |
| NET LEC LLC.                                       | Terrestrial Licensed Fixed Wireless         | 2,153                 | \$1,629,067          | \$2,438,566          |
| Norvado Inc.                                       | Fiber                                       | 9,129                 | \$39,259,359         | \$34,400,897         |
| Pierce Pepin Cooperative Services                  | Fiber                                       | 5,123                 | \$21,549,140         | \$8,671,167          |
| Sokaogon Chippewa Tribe                            | Fiber                                       | 4,527                 | \$73,292,152         | \$276,793            |
| Space Exploration Technologies, Corp.              | Low Earth Orbit Satellite                   | 22,948                | \$34,404,450         | \$25,563,114         |
| Spectrum Mid-America LLC                           | Fiber                                       | 1,221                 | \$6,335,769          | \$2,112,330          |
| Waypoint Experts                                   | Fiber                                       | 189                   | \$2,606,894          | \$868,993            |
| Waypoint Experts                                   | Terrestrial Licensed Fixed Wireless         | 533                   | \$1,113,100          | \$371,255            |
| Wisconsin Bell LLC dba AT&T Wisconsin              | Fiber                                       | 769                   | \$1,167,785          | \$3,789,384          |
| WITTENBERG TELEPHONE COMPANY INC. DBA CIRINITY LLC | Fiber                                       | 225                   | \$732,150            | \$468,000            |
| WITTENBERG TELEPHONE COMPANY INC. DBA CIRINITY LLC | Terrestrial Licensed by Rule Fixed Wireless | 950                   | \$1,201,607          | \$495,429            |
|  |   | <b>174,092</b>        | <b>\$690,445,792</b> | <b>\$359,289,762</b> |

### Community Anchor Institution Funding Requests

NTIA had approved an additional grant round in the Initial Proposal Volume 2 to improve service to gigabit connections at eligible Community Anchor Institutions (CAIs). While still an approved allowable activity, the Commission determined it was necessary, given the shortened timeline under the policy notice, to provide applicants with the opportunity to submit bids for CAIs in the BEAD BOB grant round instead of CAIs having their own separate round. Applicants were asked if they wanted to be considered for a BEAD funding award to provide 1 gigabit symmetrical service for any eligible CAI and were asked to list each eligible CAI the

applicant requested to fund through BEAD. CAI funding was contingent upon all BEAD eligible locations having a preliminary award. These CAIs were considered for funding as part of the BOB grant round if a provider indicated willingness to serve them at a reasonable cost. Applicants had the opportunity to complete a spreadsheet template to indicate all CAIs they were willing to serve if BEAD funding remained following preliminary awards. ([PSC REF#: 552852](#)).

Applicants requested a total of \$5,927,609 of BEAD funding to serve 1,844 BEAD eligible CAIs with qualified gigabit symmetrical service. Following the competitive BEAD BOB subgrantee selection process, Commission staff determined additional BEAD funds to be available. Commission staff reached out to BEAD participants to confirm their commitment to serve their submitted CAI locations following the preliminary awarding process results. Based on the remaining funds and the applications recommended for preliminary awards, Commission staff recommends six entities to serve 1,205 CAIs for a total of \$1,484,000 in BEAD funds as shown in the table below.

***Table 7 Funding Recommendations for Eligible CAIs***

| <b>Entity</b>  | <b># of CAI Locations</b> | <b>Total BEAD Funding Recommendation</b> |
|--|---------------------------|--|
| Connect Holding II DBA Brightspeed                         | 1,149                     | \$1,149,000                              |
| Lemonweir Valley Telephone DBA Lynxx Networks              | 3                         | \$15,000                                 |
| Marquette Adams Telephone Coop, Inc                        | 1                         | \$9,500                                  |
| Mount Horeb Telephone Company                              | 16                        | \$144,000                                |
| Norvado Inc.   | 12                        | \$106,500                                |
| Pierce Pepin Cooperative Services DBA SwiftCurrent Connect | 24                        | \$60,000                                 |
|  | <b>1,205</b>              | <b>\$1,484,000</b>                       |

## **BEAD Final Proposal**

Attachment 2 to this memorandum is Commission's staff's draft BEAD Final Proposal. The Final Proposal follows the template for the Final Proposal established by NTIA and incorporates the information provided in this memorandum, including the funding recommendations in Tables 6 and 7.

### **Commission Alternatives: BEAD Final Proposal**

**Alternative One:** Approve the BEAD Final Proposal and direct staff to finalize and submit it for approval to NTIA, including making any modifications necessary to gain approval from NTIA.

**Alternative Two:** Approve the BEAD Final Proposal with modifications pursuant to the Commission's discussion and direct Commission staff to submit it for approval to NTIA, including making any other modifications necessary to gain approval from NTIA.

**Alternative Three:** Do not approve the Wisconsin BEAD Final Proposal and direct Commission staff to modify the proposal pursuant to its discussion and return the revised Final Proposal to the Commission.

## **BEAD Next Steps**

Should the Commission approve the BEAD Final Proposal submission, staff will submit the Final Proposal to NTIA by September 4, 2025. In the BEAD Restructuring Policy notice it is noted that NTIA will complete its review of each Final Proposal within 90 days of submission.<sup>22</sup> NTIA has the authority to reject, cure, or overturn the final proposal submission and any of its component parts, including the priority project and preliminary award determinations.

When NTIA approval of Wisconsin's Final Proposal is received, Commission staff will work with BEAD grantees on post award administration. Finalized grant agreements will be executed that ensure grantee compliance with BEAD requirements and relevant federal and state laws. Prior to entering into any subgrantee agreement, grantees must provide a letter of credit (LOC) or performance bond from an eligible financial institution for at least 10 percent of the subaward amount. Commission staff will provide information to grantees on reporting requirements and how Commission staff will monitor administrative, programmatic, financial, and operational compliance during the performance period. The monitoring plan must also be approved by NTIA as part of the Final Proposal.

Once a grantee executes their grant agreement, they will be required to demonstrate compliance with the National Environmental Policy Act (NEPA) before breaking ground. NTIA requirements specify that BEAD-funded networks be completed within four years of execution of a grant agreement, thus BEAD deployment is expected to conclude by 2030. Following the completion of a project the awardee must continue to operate the network and provide service to the BEAD locations for at least ten years. In the case of an award to a LEO subgrantee, NTIA requires a longer performance period that extends ten years after the locations are in service, and

---

<sup>22</sup> <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf> pg. 10

the LEO service provider must hold capacity on their network for all the BEAD locations for the extended period of performance.

JF:TK:AK:RT:MM:JL:CL:bs DL: 02090630

Attachments:

Attachment 1 Recommended BEAD Awards by County and Entity

Attachment 2 Draft Wisconsin BEAD Final Proposal

Wisconsin BEAD Award Recommendations

Recommended BEAD Funding Awards, by Entity and County

Subject to final review and approval by the National Telecommunications and Information Administration

|                    | AMG Technology<br>Investment Group,<br>LLC | Bertram<br>Communications<br>LLC | Bug Tusse/Hilbert<br>Communications | City of<br>Superior | Comcast Cable<br>Communications<br>Management LLC | Connect Holding II<br>LLC | Country Wireless | CTC Telcom<br>Inc. | East Central<br>Energy | Edge Broadband<br>LLC | Frontier North Inc. | Hillsboro<br>Telephone<br>Company, Inc. | IBT Group USA<br>LLC | La Valle Telephone<br>Coop / Richland<br>Grant Telephone<br>Coop | Lac du Flambeau Band<br>of the Lake Superior<br>Chippewa Indians | Lakeland<br>Communications<br>Group, LLC | Lemonweir Valley<br>Telephone Company | Marquette-Adams<br>Telephone<br>Cooperative | Mount Horeb<br>Telephone Company | NEIT Broadband<br>LLC | NET LEC LLC. | Norvado Inc. | Pierce Pepin<br>Cooperative<br>Services | Sokaogon<br>Chippewa Tribe | Space Exploration<br>Technologies, Corp. | Spectrum Mid-<br>America LLC | Waypoint Experts | Wisconsin Bell LLC<br>dba AT&T<br>Wisconsin | WITTENBERG<br>TELEPHONE COMPANY<br>INC. DBA CIRINITY LLC |                       |             |
|--------------------|--|----------------------------------|-------------------------------------|---------------------|---|---------------------------|------------------|--------------------|------------------------|-----------------------|---------------------|---|----------------------|--|--|--|---------------------------------------|---|----------------------------------|-----------------------|--------------|--------------|---|----------------------------|--|------------------------------|------------------|---|--|-----------------------|-------------|
|                    | Fixed Wireless                             | Fiber                            | Fiber, Fixed Wireless               | Fiber               | Fiber   | Fiber                     | Fixed Wireless   | Fiber              | Fiber                  | Fiber                 | Fiber               | Fiber                                   | Fixed Wireless       | Fiber  | Fiber  | Fiber                                    | Fiber                                 | Fiber                                       | Fiber, Fixed Wireless            | Fiber                 | Fiber        | Fiber        | Fiber                                   | Low Earth Orbit Satellite  | Fiber                                    | Fiber, Fixed<br>Wireless     | Fiber            | Fiber, Fixed<br>Wireless                    | Fiber  | Fiber, Fixed Wireless | Total       |
| Adams County       |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       | \$5,523,937         |   |                      |  |  |  |                                       | \$815,007                                   | Fiber, Fixed Wireless            |                       |              |              |   |                            |  |                              |                  |   |  | \$6,438,273           |             |
| Ashland County     |  |                                  | \$26,400                            |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              | \$7,777,774  |   |                            |  |                              | \$3,432,720      |   |  | \$11,962,394          |             |
| Barron County      |  |                                  |                                     |                     |   | \$5,370,279               |                  | \$4,992,172        |                        |                       |                     |   |                      |  |  | \$147,581                                |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$10,568,032          |             |
| Bayfield County    |  |                                  |                                     |                     |   | \$9,970                   |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$345,258             |             |
| Brown County       |  |                                  | \$11,468,006                        |                     |   | \$3,826,538               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              | \$14         |   |                            |  | \$287,274                    |                  |   |  | \$16,293,605          |             |
| Buffalo County     |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       | \$697,561    |              |   |                            |  |                              |                  |   | \$421,500  |                       |             |
| Burnett County     |  |                                  |                                     |                     |   | \$1,365,028               |                  | \$8,711,507        | \$365,863              |                       |                     |   |                      |  |  | \$16,384                                 |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$10,478,282          |             |
| Calumet County     |  | \$3,349,563                      | \$324,138                           |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$3,696,201           |             |
| Chippewa County    |  |                                  |                                     |                     |   | \$181,194                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$2,561,694           |             |
| Clark County       |  |                                  |                                     |                     |   | \$2,868,702               | \$677,236        |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              | \$1,189,510                             |                            |  |                              |                  |   |  | \$6,799,448           |             |
| Columbia County    |  | \$9,381,579                      | \$116,902                           |                     |   | \$10,950,372              |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       | \$4,946,279                                 |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$25,506,132          |             |
| Crawford County    |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       | \$1,048,914  |              |   |                            |  |                              |                  |   |  | \$2,689,914           |             |
| Dane County        |  | \$16,804,131                     |                                     |                     |   | \$242,800                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$17,046,931          |             |
| Dodge County       |  | \$14,999,949                     | \$226,910                           |                     |   | \$84,625                  |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$15,321,984          |             |
| Door County        |  | \$1,329,906                      |                                     |                     |   | \$6,917,512               |                  |                    |                        |                       | \$10,398,689        |   |                      |  |  |  |                                       |   |                                  |                       |              | \$112,517    |   |                            |  |                              |                  | \$678,907                                   |  | \$19,923,531          |             |
| Douglas County     |  |                                  |                                     | \$80,001            |   | \$6,664,658               |                  | \$7,284,780        | \$7,411,506            |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$21,458,945          |             |
| Dunn County        |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$253,500             |             |
| Eau Claire County  |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$331,500             |             |
| Florence County    |  |                                  |                                     |                     |   | \$157,789                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$331,500             |             |
| Fond du Lac County |  | \$2,713,090                      | \$1,999,787                         |                     |   | \$418,996                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$38,386,170          |             |
| Forest County      |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$5,173,873           |             |
| Grant County       |  |                                  |                                     |                     |   | \$7,512,722               |                  |                    |                        |                       |                     |   |                      | \$1,373,138  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$10,958,860          |             |
| Green County       |  |                                  | \$959,014                           |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$1,637,014           |             |
| Green Lake County  |  |                                  | \$1,690,667                         |                     |   | \$4,529,028               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       | \$60,000                                    |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$6,416,195           |             |
| Iowa County        |  |                                  | \$8,340,694                         |                     |   | \$463,652                 |                  |                    |                        |                       |                     |   |                      | \$285,615  |  |  |                                       |   | \$201,347                        |                       |              |              |   |                            |  |                              |                  |   |  | \$10,131,308          |             |
| Iron County        |  |                                  | \$1,182,498                         |                     |   | \$8,157,475               |                  |                    |                        |                       |                     |   |                      |  |  | \$71,164                                 |                                       |   |                                  |                       |              | \$3,052,921  |   |                            |  |                              |                  |   |  | \$12,960,558          |             |
| Jackson County     |  |                                  |                                     |                     |   | \$1,744,923               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              | \$16,587,896                            |                            |  |                              |                  |   |  | \$18,347,819          |             |
| Jefferson County   |  | \$8,123,893                      | \$1,164,738                         |                     |   | \$383,240                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$9,908,565           |             |
| Juneau County      |  |                                  | \$75,238                            |                     |   |                           |                  |                    |                        |                       |                     |   |                      | \$3,317,815  |  |  | \$3,905,157                           |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$7,412,210           |             |
| Kenosha County     |  | \$2,186,329                      |                                     |                     |   |                           |                  |                    |                        |                       | \$68,392            |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  | \$154,139                                   |  |                       | \$2,410,360 |
| Kewaunee County    |  |                                  | \$2,924,063                         |                     |   | \$14,478,140              |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$17,460,703          |             |
| La Crosse County   |  |                                  | \$1,269,101                         |                     |   | \$1,371,946               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       | \$6,000                                     |                                  |                       |              |              | \$1,500,970                             |                            |  |                              |                  |   |  | \$4,631,017           |             |
| Lafayette County   | \$1,101,223                                |                                  | \$1,268,906                         |                     |   | \$0                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$2,431,629           |             |
| Langlade County    |  | \$13,186,569                     |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       | \$67,076     |              |   |                            |  |                              |                  |   |  | \$645,842             |             |
| Lincoln County     |  | \$4,424,231                      |                                     |                     |   |                           |                  |                    |                        |                       | \$14,372,428        |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$13,899,487          |             |
| Manitowoc County   |  |                                  | \$300,821                           |                     | \$3,629,983                                       | \$1,173,265               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              | \$0          |   |                            |  |                              |                  |   |  | \$19,464,371          |             |
| Marathon County    |  |                                  | \$17,307,915                        |                     |   |                           | \$15,946         |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$6,103,069           |             |
| Marinette County   |  |                                  |                                     |                     |   | \$7,512,065               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       | \$290,205    |              |   |                            |  |                              |                  |   |  | \$28,905,280          |             |
| Marquette County   |  | \$4,658,135                      |                                     |                     |   | \$1,104,720               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       | \$197,470                                   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$10,029,308          |             |
| Milwaukee County   |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$243,000             |             |
| Monroe County      |  |                                  | \$915,035                           |                     |   | \$15,731,646              |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$26,867,436          |             |
| Oconto County      |  |                                  | \$10,363,460                        |                     |   | \$750,044                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$12,362,135          |             |
| Oneida County      |  | \$13,408,711                     | \$4,797,101                         |                     |   |                           |                  |                    |                        |                       |                     |   | \$170,025            |  |  |  |                                       |   |                                  |                       |              | \$480,106    |   |                            |  |                              |                  |   |  | \$18,282,312          |             |
| Outagamie County   |  | \$8,831,275                      |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$9,821,459           |             |
| Ozaukee County     |  | \$3,733,446                      |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$3,733,446           |             |
| Pepin County       |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$30,509              |             |
| Pierce County      |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              | \$20,009                                |                            |  |                              |                  |   |  | \$87,000              |             |
| Polk County        |  |                                  |                                     |                     |   | \$753,182                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$2,348,761           |             |
| Portage County     |  |                                  |                                     |                     |   |                           | \$62,846         |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$969,296             |             |
| Price County       |  |                                  | \$646,122                           |                     |   | \$1,618,183               | \$84,420         |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              | \$13,197,578 |   |                            |  |                              |                  |   |  | \$15,841,803          |             |
| Racine County      |  | \$2,295,342                      |                                     |                     |   | \$45,000                  |                  |                    |                        | \$37,625              |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$2,377,967           |             |
| Richland County    |  |                                  | \$160,395                           |                     |   |                           |                  |                    |                        |                       |                     |   |                      | \$1,878,888  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$2,060,283           |             |
| Rock County        |  | \$4,698,767                      | \$1,547,623                         |                     |   | \$138,546                 |                  |                    |                        | \$626,829             |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$7,041,765           |             |
| Rusk County        |  |                                  |                                     |                     |   | \$3,516,174               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$5,914,674           |             |
| Saint Croix County |  |                                  |                                     |                     |   | \$511,586                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$776,615             |             |
| Sauk County        |  |                                  |                                     |                     |   | \$1,418,439               |                  |                    |                        |                       |                     |   |                      | \$375,721  |  |  |                                       |   |                                  |                       |              |              | \$265,029                               |                            |  |                              |                  |   |  | \$2,433,160           |             |
| Sawyer County      |  |                                  | \$119,808                           |                     |   |                           |                  | \$295,571          |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$10,534,286          |             |
| Shawano County     |  | \$14,762,606                     | \$161,230                           |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              | \$9,649,407  |   |                            |  |                              |                  |   |  | \$4,500               |             |
| Sheboygan County   |  | \$5,597,869                      | \$145,229                           |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$555,765             |             |
| St. Croix County   |  |                                  |                                     |                     | \$2,292,865                                       |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$5,746,098           |             |
| Taylor County      |  |                                  | \$15,199,951                        |                     |   |                           | \$177,282        |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$2,819,989           |             |
| Trempealeau County |  |                                  |                                     |                     |   | \$156,042                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$15,719,233          |             |
| Vernon County      |  |                                  | \$234,562                           |                     |   |                           |                  |                    |                        |                       |                     | \$893,465                               |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$4,989,042           |             |
| Vilas County       |  |                                  |                                     |                     |   | \$599,829                 |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$1,347,027           |             |
| Walworth County    |  | \$3,011,077                      |                                     |                     |   |                           |                  |                    |                        | \$1,569,892           |                     |   |                      |  | \$7,319,452  |  |                                       |   |                                  |                       |              | \$5,581,665  |   |                            |  |                              |                  |   |  | \$13,896,946          |             |
| Washington County  |  |                                  |                                     |                     |   | \$10,114,124              |                  | \$14,106,398       | \$170,320              |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$4,923,208           |             |
| Washington County  |  | \$9,230,402                      |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$24,401,342          |             |
| Waukesha County    |  | \$2,970,861                      |                                     |                     |   | \$816,094                 |                  |                    |                        | \$250,247             |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$9,230,402           |             |
| Waupaca County     |  | \$5,825,990                      |                                     |                     |   | \$1,732,688               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$8,126,469           |             |
| Waushara County    |  | \$2,894,964                      | \$2,276,911                         |                     |   | \$4,333,779               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$9,591,154           |             |
| Winnebago County   |  | \$2,748,427                      | \$284,726                           |                     |   | \$3,467,075               |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  | \$6,522,728           |             |
| Wood County        |  |                                  | \$152,835                           |                     |   |                           |                  |                    |                        |                       | \$1,614,            |   |                      |  |  |  |                                       |   |                                  |                       |              |              |   |                            |  |                              |                  |   |  |                       |             |



Wisconsin BEAD Award Recommendations

Recommended BEAD Awarded Locations, by Entity and County

Subject to final review and approval by the National Telecommunications and Information Administration

|                    | AMG Technology<br>Investment Group,<br>LLC | Bertram<br>Communications<br>LLC | Bug Tusse/Hilbert<br>Communications | City of<br>Superior | Comcast Cable<br>Communications<br>Management LLC | Connect Holding II<br>LLC | Country Wireless | CTC Telcom<br>Inc. | East Central<br>Energy | Edge Broadband<br>LLC | Frontier North Inc. | Hillsboro<br>Telephone<br>Company, Inc. | IBT Group USA<br>LLC | La Valle Telephone<br>Coop / Richland<br>Grant Telephone<br>Coop | Lac du Flambeau Band<br>of the Lake Superior<br>Chippewa Indians | Lakeland<br>Communications<br>Group, LLC | Lemonweir Valley<br>Telephone Company | Marquette-Adams<br>Telephone<br>Cooperative | Mount Horeb<br>Telephone<br>Company | NET Broadband<br>LLC | NET LEC LLC.             | Norvado Inc. | Pierce Pepin<br>Cooperative<br>Services | Sokaogon<br>Chippewa Tribe | Space Exploration<br>Technologies, Corp. | Spectrum Mid-<br>America LLC | Waypoint Experts         | Wisconsin Bell LLC<br>dba AT&T<br>Wisconsin | WITTENBERG<br>TELEPHONE COMPANY<br>INC. DBA CIRINITY LLC |         |
|--------------------|--|----------------------------------|-------------------------------------|---------------------|---|---------------------------|------------------|--------------------|------------------------|-----------------------|---------------------|---|----------------------|--|--|--|---------------------------------------|---|-------------------------------------|----------------------|--------------------------|--------------|---|----------------------------|--|------------------------------|--------------------------|---|--|---------|
|                    | Fixed Wireless                             | Fiber                            | Fiber, Fixed Wireless               | Fiber               | Fiber   | Fiber                     | Fixed Wireless   | Fiber              | Fiber                  | Fiber                 | Fiber               | Fiber                                   | Fixed Wireless       | Fiber  | Fiber  | Fiber                                    | Fiber                                 | Fiber                                       | Fiber, Fixed<br>Wireless            | Fiber                | Fiber, Fixed<br>Wireless | Fiber        | Fiber                                   | Fiber                      | Low Earth Orbit Satellite                | Fiber                        | Fiber, Fixed<br>Wireless | Fiber                                       | Fiber, Fixed<br>Wireless                                 | Total   |
| Adams County       |  |                                  | 45                                  |                     |   |                           |                  |                    |                        |                       | 2,167               |   |                      |  |  |  |                                       | 52  |                                     |                      |                          |              |   |                            | 40                                       |                              |                          |   |  | 2,304   |
| Ashland County     |  |                                  | 55                                  |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          | 1,016        |   |                            | 477                                      |                              | 696                      |   |  | 2,244   |
| Barron County      |  |                                  |                                     |                     |   | 1,688                     |                  | 1,026              |                        |                       |                     |   |                      |  |  | 29                                       |                                       |   |                                     |                      |                          |              |   |                            |  | 32                           |                          |   |  | 2,775   |
| Bayfield County    |  |                                  |                                     |                     |   | 1                         |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  | 32                           |                          | 26  |  | 73      |
| Brown County       |  |                                  | 2,104                               |                     |   | 1,723                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              | 14                                      |                            |  | 201                          |                          |   |  | 4,312   |
| Buffalo County     |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   | 284                        |  |                              |                          |   |  | 281     |
| Burnett County     |  |                                  |                                     |                     |   | 252                       |                  | 1,538              | 83                     |                       |                     |   |                      |  |  | 4  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1,890   |
| Calumet County     |  | 648                              | 277                                 |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 281     |
| Chippewa County    |  |                                  |                                     |                     |   | 129                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 13      |
| Clark County       |  |                                  |                                     |                     |   | 893                       | 722              |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              | 380                                     |                            |  |                              |                          |   |  | 15      |
| Columbia County    |  | 1,803                            | 73                                  |                     |   | 2,234                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       | 379   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1,716   |
| Crawford County    |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1,376   |
| Dane County        |  |                                  | 2,801                               |                     |   | 80                        |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      | 391                      |              |   |                            |  |                              |                          |   |  | 74      |
| Dodge County       |  |                                  | 2,357                               | 217                 |   | 128                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1,485   |
| Door County        |  |                                  | 223                                 |                     |   | 2,773                     |                  |                    |                        |                       | 1,881               |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 2,881   |
| Douglas County     |  |                                  |                                     |                     | 5   | 1,581                     |                  | 1,318              | 1,980                  |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 7       |
| Dunn County        |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 324     |
| Eau Claire County  |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 5,875   |
| Florence County    |  |                                  |                                     |                     |   | 29                        |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 12      |
| Fond du Lac County |  | 440                              | 1,488                               |                     |   | 123                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 169     |
| Forest County      |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 221     |
| Grant County       |  |                                  |                                     |                     |   | 1,814                     |                  |                    |                        |                       |                     |   |                      |  | 168  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 42      |
| Green County       |  |                                  | 990                                 |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 2,378   |
| Green Lake County  |  |                                  | 380                                 |                     |   | 1,839                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 28      |
| Iowa County        |  |                                  | 2,760                               |                     |   | 417                       |                  |                    |                        |                       |                     |   |                      |  | 55   |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 26      |
| Iron County        |  |                                  | 797                                 |                     |   | 2,392                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1,382   |
| Jackson County     |  |                                  |                                     |                     |   | 677                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 452     |
| Jefferson County   |  |                                  | 935                                 | 457                 |   | 67                        |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 91      |
| Juneau County      |  |                                  | 30                                  |                     |   |                           |                  |                    |                        | 200                   |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 560     |
| Kenosha County     |  |                                  | 544                                 |                     |   |                           |                  |                    |                        |                       | 27                  |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 331     |
| Kewaunee County    |  |                                  | 758                                 |                     |   | 2,910                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 10      |
| La Crosse County   |  |                                  | 818                                 |                     |   | 587                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 6       |
| Lafayette County   | 1,328                                      |                                  | 1,291                               |                     |   | 403                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 76      |
| Langlade County    |  |                                  | 2,515                               |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 387     |
| Lincoln County     |  |                                  | 855                                 |                     |   | 164                       |                  |                    |                        |                       | 1,827               |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 459     |
| Manitowoc County   |  |                                  | 269                                 |                     | 594   | 213                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1       |
| Marathon County    |  |                                  | 3,316                               |                     |   |                           | 17               |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 666     |
| Marinette County   |  |                                  |                                     |                     |   | 2,578                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 3,009   |
| Marquette County   |  | 875                              |                                     |                     |   | 620                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1,406   |
| Milwaukee County   |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1       |
| Monroe County      |  |                                  | 674                                 |                     |   | 4,111                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 162     |
| Oconto County      |  |                                  | 2,427                               |                     |   | 188                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 155     |
| Oneida County      |  |                                  | 2,360                               |                     |   |                           |                  |                    |                        |                       |                     |   | 123                  |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 449     |
| Outagamie County   |  |                                  | 1,549                               |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 2,070   |
| Ozaukee County     |  |                                  | 705                                 |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 51      |
| Pepin County       |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 284     |
| Pierce County      |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 7       |
| Polk County        |  |                                  |                                     |                     |   | 231                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 17      |
| Portage County     |  |                                  |                                     |                     |   |                           |                  | 67                 |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 58      |
| Price County       |  |                                  |                                     |                     |   |                           |                  | 90                 |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 127     |
| Racine County      |  | 458                              | 475                                 |                     |   | 317                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 616     |
| Richland County    |  |                                  |                                     |                     |   | 3                         |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 2,590   |
| Rock County        |  | 831                              | 1,448                               |                     |   | 397                       |                  |                    |                        | 480                   |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 197     |
| Rusk County        |  |                                  |                                     |                     |   | 1,663                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 14      |
| Saint Croix County |  |                                  |                                     |                     |   | 229                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 20      |
| Sauk County        |  |                                  |                                     |                     |   | 395                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1,599   |
| Sawyer County      |  |                                  | 117                                 |                     |   |                           |                  |                    |                        |                       |                     |   |                      | 52   |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 60      |
| Shawano County     |  |                                  |                                     |                     |   |                           |                  | 51                 |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 426     |
| Sheboygan County   |  | 2,565                            | 85                                  |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 313     |
| St. Croix County   |  | 1,066                            | 57                                  |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 3       |
| Taylor County      |  |                                  |                                     |                     | 266   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 1,137   |
| Trempealeau County |  |                                  | 809                                 |                     |   | 126                       | 189              |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 2       |
| Vernon County      |  |                                  | 149                                 |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 41      |
| Vilas County       |  |                                  |                                     |                     |   | 237                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 206     |
| Walworth County    |  |                                  |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 228     |
| Washburn County    |  |                                  |                                     |                     |   | 3,531                     |                  | 2,923              | 38                     | 1,096                 |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 3,222   |
| Washington County  |  | 1,486                            |                                     |                     |   |                           |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 146     |
| Waukesha County    |  | 943                              |                                     |                     |   | 160                       |                  |                    |                        | 117                   |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 264     |
| Waupaca County     |  |                                  |                                     |                     |   | 1,383                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 5       |
| Waushara County    |  | 1,227                            |                                     |                     |   | 2,407                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 7       |
| Winnebago County   |  | 518                              | 1,258                               |                     |   | 249                       |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 109     |
| Wood County        |  | 699                              | 134                                 |                     |   | 1,434                     |                  |                    |                        |                       |                     |   |                      |  |  |  |                                       |   |                                     |                      |                          |              |   |                            |  |                              |                          |   |  | 15      |
| Total              | 1,328                                      | 28,903                           | 26,832                              | 5                   | 860   | 43,127                    | 1,085            | 6,856              | 2,101                  | 1,900                 | 6,069               | 44                                      | 123                  | 1,006  | 932  | 474                                      | 1,101                                 | 470   | 29                                  | 391                  | 4,842                    | 9,129        | 5,123                                   | 4,527                      | 22,948                                   | 1,221                        | 722                      | 769   | 1,175  | 174,092 |