

# **Arizona Broadband, Equity, Access, and Deployment (BEAD) Program Project Application Guide**

Arizona Commerce Authority (ACA)

July 2025

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## **1. Disclaimer**

In addition to the guidance outlined herein, the Arizona Commerce Authority (ACA) will comply with the BEAD Notice of Funding Opportunity (NOFO), the BEAD Initial Proposal Volume II, BEAD Final Proposal Guidelines, the BEAD Restructuring Policy published on June 6, 2025, and any subsequent guidance issued by the National Telecommunications and Information Administration, as applicable. The Arizona State Broadband Office and ACA reserve the right to modify or update this document at its discretion to implement Federal, State, or Local requirements, along with any procurement rules or guidelines at issue from the ACA, or for any other reason necessary to effectively administer the BEAD Program.

## 2. Key Information

### 2.1 Summary

The Broadband Equity, Access, and Deployment (BEAD) Program, managed by the National Telecommunications and Information Administration (NTIA), allocates \$42.45 billion to enhance high-speed internet access. This funding assists planning, infrastructure development, and Program adoption across all 50 States and Territories. The State of Arizona has received an allocation of \$993.1 million. Additional details about the BEAD Program can be found in the NTIA’s [BEAD NOFO](#) and [the BEAD Restructuring Policy Notice](#).

### 2.2 Purpose of this Guidance

This Project Application Guidance aims to help Applicants provide the necessary information and documentation in accordance with the BEAD NOFO, the BEAD Restructuring Policy Notice, the ACA Procurement Guidelines, and Arizona’s BEAD Initial Proposal. This guidance is essential for those planning to apply to ACA’s BEAD funding Program.

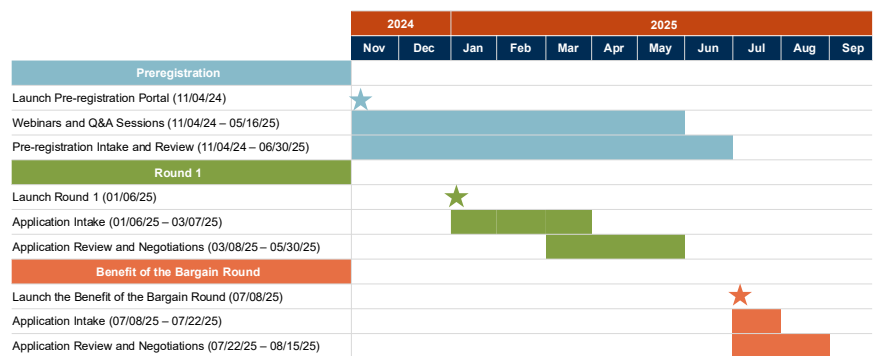
**Submitting this Project Application is mandatory for any Applicant’s participation in the BEAD Program. The Applicant’s information gathered during this process can be used for all future BEAD applications, including multiple Project Applications.**

Aside from this Guidance document, informational webinars and documents will also be available for further assistance. All relevant information about the Project Application process will be made accessible on the ACA’s website.

**ACA advises all potential proposers to thoroughly read the entire guidance package, along with the documents referenced in it, prior to starting the Project Application’s responses. Doing so will provide a clear understanding of the complete scope of Project Application requirements and further details about the process itself.**

### 2.3 Project Application Deadline

The Benefit of the Bargain (BOB) Round will open on July 8, 2025, and close on July 22, 2025. Figure 1 provides a preliminary BEAD Subgrantee selection timeline. It shall be noted that the dates reflected on Figure 1 are subject to change.



**Figure 1: BEAD Subgrantee Selection Tentative Timeline**

Additional information on submitting a Project Application is provided below.

## 2.4 Submission Instructions

Applicants for the BEAD Program should submit their Project Application through ACA's [BEAD Grantor Portal](https://register.bead.azcommerce.com/register/bead) at <https://register.bead.azcommerce.com/register/bead>.

To support the exchange of information and submission of documents for the BEAD Program, ACA's Project Application portal allows for the secure upload of files that are accessible to ACA Project team and the broadband service provider to which they are assigned. Applicants must furnish all information requested. Submissions that do not comply with the requested information may be rejected or returned to the Applicant for modification. Applicants will be notified through the portal on the requested modifications/updates and will have the opportunity to submit a modified/updated Project Application before rejection. Any submission that does not adhere to instructions in the Project Application may be deemed non-responsive and rejected on that basis. Only information that is received in response to the requirements in this document and as required in the Project Application along with required attachments will be assessed.

Applicants will be able to work on the applications and save draft progress on the portal over time before final submission prior to the close of the Project Application submission deadline. No other submission method is allowed. Project Applications must be complete, and attachments clearly labeled. Completed Project Application, attachments, and supporting documentation must be received by ACA by the date and time listed above, to be considered for Project Application evaluation. It is the Applicant's responsibility to ensure the completed Project Application response form is received by the ACA prior to the submission deadline. Applicants will receive an email confirmation for the receipt of their submission within 24 hours of completing the online Project Application. It is the Applicant's responsibility to ensure the application is received by the ACA prior to the submission deadline.

An Applicant that fails to submit a complete application by the deadline may be excluded from consideration for a BEAD subgrant award for that specific round. Official Project Application submission date and time will be determined by the time stamp accompanying the application within the online submission system. Project Applications dated and time stamped in any other way will be rejected. If a confirmation receipt is not received within two business days, Applicants must contact the ACA Office as noted below.

All the Applicants including the Applicants in Round 1 will have to start a new Project Application on the Project Application portal for the BOB Round to meet the requirements of the NTIA BEAD Restructuring Policy Notice.

Applicants who would like to leverage their previous Project Applications submitted under Round 1 for the BOB Round will still be able to access their previous application for Round 1 on the portal and can use it to extract/copy and paste previous application information to the new application for the BOB Round.

Project Application submissions will be reviewed and evaluated by the ACA Project team. The ACA will notify the outcome of its review of the Project Applications to the Applicants.

## 2.5 Contact Information

If potential Applicants have any questions related to this guidance document and supporting documentation, please refer to the Frequently Asked Questions (FAQs) document made available on the ACA website or contact ACA at [broadband@azcommerce.com](mailto:broadband@azcommerce.com).

For any technical assistance / queries regarding the Project Application portal, Applicants can reach out to [azhelpdesk@ready.net](mailto:azhelpdesk@ready.net).

## **3. Program Background**

### **3.1 Arizona Commerce Authority**

#### **3.1.1 Overview**

The Arizona Commerce Authority was established to facilitate the beneficial economic growth and development of the State and to promote prosperity through the development and protection of the legitimate interests of Arizona business, industry, and commerce within and outside the State. ACA actively collaborates with State and Local Government stakeholders, as well as the private sector, to streamline regulatory barriers and maximize funding for broadband development in Arizona.

The Arizona Commerce Authority State Broadband Office, led by the State Broadband Director within ACA, coordinates local, State, and federal broadband Programs, executes federal broadband grant applications, and works with partners and telecommunication providers to develop internet connectivity and enhance resiliency plans.

#### **3.1.2 Vision**

The Arizona Commerce Authority and Governor Hobbs are committed to working diligently to advance the development of broadband infrastructure across the State to provide high-speed and affordable Broadband Services to every resident in Arizona. Arizona's vision is to provide dependable and affordable high-speed internet services to every community.

ACA is committed to maximizing and optimizing the use of available resources and promoting cost-efficient solutions for all Arizona communities.

### **3.2 Broadband Equity, Access, and Deployment Program**

The BEAD Program is authorized by the Infrastructure Investment and Jobs Act (IIJA) and provides funding of \$42.45 billion, of which the State of Arizona has been allocated \$993.1 million. The main objective of the BEAD Program is to achieve universal connectivity by establishing the necessary groundwork for widespread access, affordability and adoption of broadband. Additionally, the Program aims to create well-paying job opportunities and address long-standing coverage gaps. BEAD's primary focus is on deploying broadband services, prioritizing the provision of infrastructure to Unserved Locations, followed by Underserved Locations, and then serving Community Anchor Institutions ("CAIs").

#### **3.2.1 Broadband Deployment**

The BEAD Program focuses on deploying infrastructure and expanding high speed internet access to Unserved, Underserved and CAI locations, via Broadband Service that is accessible to a location via:

- Fiber-optic technology (Broadband Data Collection (BDC) technology code 50)
- Cable modem/hybrid fiber coaxial (HFC) technology (technology code 40)
- Digital subscriber line (DSL) technology (technology code 12)



- Terrestrial fixed wireless technology utilizing entirely licensed spectrum (includes spectrum licensed by rule – technology code 71), entirely unlicensed spectrum (technology code 70) or using a hybrid of licensed and unlicensed spectrum (technology codes 71 and 72)
- Low Earth Orbit (LEO) Satellite services
- Unserved Locations: Locations without access to a Broadband Service at all or with a Broadband Service offering speeds below 25 Mbps download and 3 Mbps upload.
- Underserved Locations: Locations without Broadband Service offering speeds of at least 100 Mbps download and 20 Mbps upload.
- CAls: A school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.

### 3.2.2 Non-Deployment

The ACA's highest priority is to utilize BEAD Program funds to provide affordable, reliable, and scalable broadband infrastructure to every Unserved and Underserved Location in Arizona, followed by equipping eligible CAls lacking symmetrical gigabit access. Based on the NTIA BEAD Restructuring Policy, the Arizona Commerce Authority is not planning to allocate any funding to non-deployment activities.

### 3.2.3 Eligible Project Areas Criteria

Criteria Related to Project Areas:

- **Individual Project Areas:** Applicants are required to submit separate Project Applications for each individual Project Area they propose to serve. Applicants can submit multiple applications.
  - Each Project Area will be evaluated individually and scored accordingly. Preliminary selection of applications will be followed by preliminary awards.
  - Applicants planning to apply for adjoining Project Areas are required to apply for these Project Areas separately in individual Applications.
  - Any efficiencies that the Applicants are expecting to apply for adjoining Project Areas should be incorporated in the Application separately for each proposed Project Area. Each Application will be considered valid for each Project Area, irrespective of their location.
- **Partnerships:** Applicants are encouraged to identify partners as needed to ensure that eligible BSL within the proposed Project Area will be served. Applicants must identify which entity will serve as the lead Subgrantee for the Project and will be responsible for executing the Project agreement and for ensuring that the Project is completed in accordance with the terms and conditions specified in the agreement.

A public facing interactive mapping tool will be made available to all Applicants through the Arizona Commerce Authority website. Geospatial files for Project Areas will also be made available to Applicants.

The Arizona Commerce Authority has developed a [State Broadband Map](#) including a benchmark cost for each Project Area identified in the map based on NTIA's cost model. It tracks every broadband serviceable

location (BSL) in Arizona with the National Broadband Map and include changes to the location status from the Challenge Process and deduplication of each BSL. This process will ensure the Unserved and Underserved BSLs are the priority for BEAD funds.

## **4. BEAD Deployment Subprogram Application**

Arizona's BEAD Subgrantee selection process consists of two distinct phases, as outlined below.

### **4.1 Phase 1 – Pre-marketing and Preregistration Phase**

To streamline the Subgrantee selection process for the BEAD Program, the ACA has implemented a market sounding and preregistration phase that involves preregistration of potential Applicants. This phase has been designed to save time and reduce redundancies in the application process.

During market sounding, Applicants were encouraged to select from the predefined Project Areas. The ACA will use this information to assess the demand for broadband deployment Projects across different regions in Arizona, prioritizing deployment areas where the need is greatest, and identifying challenges or gaps in the existing broadband infrastructure.

The preregistration process is intended to expedite the application process for BEAD deployment Projects and assist the potential Applicants to ensure that they have adequate financial, managerial, and technical capabilities necessary. By expediting the application process and focusing on effective data collection, the market sounding, and preregistration phase helps improve the BEAD Program's efficiency and effectiveness.

### **4.2 Phase 2 – Project Applications**

The ACA will assess the BOB Round Project Applications against the criteria outlined in the BEAD NOFO the BEAD Restructuring Policy Notice, and ACA's scoring rubric will ensure that the applications are consistent with local, state, and federal regulations. The review process will assess the merit of each application and its alignment with Program goals and objectives.

Every application will be evaluated to confirm that it is complete and meets the minimum scoring criteria. If an application fails to meet ACA's BEAD Program's mandatory requirements, it may be considered ineligible and excluded from consideration. If ACA identifies that an otherwise complete application has a minor or clear error, they may choose to perform a soft cure at their discretion to fix these issues. Applicants will be informed via email and the grant portal if their applications are deemed ineligible or require minor corrections. Applications that are not ruled ineligible will proceed in the review process. The review process will result in a list of preliminary awards.

## 5. Project Application Submission Requirements

Required information and documentation for Application submissions are outlined below.

Applicants shall submit all requested information and documentation to demonstrate that they meet the BEAD Program requirements and that they have the capability to successfully deploy and sustain any future broadband infrastructure Projects awarded under ACA's BEAD Program.

### 5.1 Applicant Information

Applicants will be required to provide basic organizational details as part of the Project Application only once for the first Project Application. Applicants are encouraged to identify partners as needed to ensure that each eligible BSL within the proposed Project Area will be served. Applicants must identify which entity will serve as the lead Subgrantee for the Project and will be responsible for executing the Project agreement and for ensuring that the Project is completed in accordance with the terms and conditions specified in the agreement.

Additionally, the Applicants should identify the below requirements and provide relevant information:

**Consortium/ Partnership Entities:** The Applicant should identify if it is a consortium or partnership made up of several members. If yes, the Applicants are required to provide a narrative that explains the organizational structure, role, relationship, and significance of each consortium member/partnership entity. The narrative provided should also demonstrate individual expertise and that the Applicant possesses sufficient working capital to successfully carry out and complete the Project. Additionally, the consortium/partnership entities are also required to submit details of the underlying agreement(s) amongst member/partnership organizations.

It is important to note that all entities within this group will share collective responsibility for meeting financial and contractual obligations, and they will be held jointly and severally liable if they fail to fulfill these obligations. In the event of the guarantor is identified, the guarantor will be held liable for financial and contractual obligations. A parental guarantee will be required at the time of signing the grant agreement.

## 6. Project Information

Applicants are urged to present their optimal and final proposals to ACA, encompassing the details required in Project Application including but not limited to covering all locations in designated Project Areas, number of Unserved/Underserved Locations served, affordability, open access network options, scalability and resilience, cost estimates, network designs, barriers, permits build-out timelines, local coordination efforts, performance data, technology, and compliance with all regulations, etc.

### 6.1 Project Area

#### 6.1.1 Project Area

ACA pre-defined the Project Areas for Arizona's BEAD Program deployment Projects throughout the State. The pre-defined Project Areas were made available on the ACA website for review and comments by the prospective Subgrantees and stakeholders.

The following key considerations governed the creation of the Project Areas:

- Census block groups and governmental unit boundaries such as county borders
- Expected Project size
- Geography and terrain
- Current competitive landscape and available backbone infrastructure

Note that tribes are expected to constitute separate Project Areas. The Project Areas in Tribes will be limited to the State of Arizona boundary.

As part of the Project Application, Applicants must select the Project Area from the list of areas available on the Project application portal for which they are submitting this application.

Applicants are required to apply separately for each Project Area they propose to serve. Applicants can submit multiple applications. Each Project Area will be evaluated individually and scored accordingly.

Applicants will be required to include at least 90% of the Unserved and Underserved BSLs in the Project Area to be considered for further evaluations and scoring.

Applicants planning to apply for adjoining Project Areas are required to apply for these Project Areas separately in individual Applications.

Any efficiencies that the Applicants are expecting to apply for adjoining Project Areas should be incorporated in the Application separately for each proposed Project Area. Each Application will be considered valid for each Project Area, irrespective of their location.

#### 6.1.2 Project Area Information

Once the Applicant selects a Project Area, the BEAD Eligible Locations within the Project Area will be auto populated, including the following information:

- Total number of BSLs included in the Project Area
- Total number of Unserved Locations

- Total number of Underserved Locations
- Total number of eligible CAIs Locations

The Project Area file with the list of BSLs and the list of CAIs can be downloaded from the Project Financials Estimation section on the portal. If the Applicant is planning to propose both Priority Broadband BSLs and Non-Priority Broadband BSLs, Applicants must ensure that Attachment 9 – Project Financials Workbook appropriately identifies the number of BSLs to be served under each Priority and/or Non-Priority BSLs category with the associated financial data. Applicants should include at least 90% of the Unserved and Underserved BSLs in the Project Area to be considered for further evaluations and scoring.

Additionally, Applicants that plan to exclude select BSLs from the Project Area in their application will be required to provide the number of BSLs and the locations IDs for those locations in the Attachment 9 - Project Financials Workbook.

Based on the proposed technology solutions in the selected Project Area, the Applicant should submit the Project Area details in Attachment 9 – Project Financials Workbook with the proposed technology breakdown for each BSL and CAI proposed to be served.

#### **(Attachment 9 – Project Financials Workbook)**

### **6.1.3 Community Anchor Institutions**

Applicants must indicate whether they plan to serve CAIs in the selected Project Areas. If yes, Applicants will be required to provide the number of eligible CAIs proposed to be served in the selected Project Areas, as published by the Arizona Commerce Authority.

Applicants are also required to provide the list of CAI IDs (unique Ready MD5 key), CAI address, proposed technology, and cost to serve the CAIs in the “CAIs” tab of Attachment 9 – Project Financials Workbook.

#### **(Attachment 9 – Project Financials Workbook)**

## **6.2 Project Executive Summary**

Applicants will provide a high-level summary of the Project, outlining the BEAD eligible locations to be served within the Project Area including a percentage breakdown of each proposed technology type, delivery approach, timeline, budget summary, and match requested by proposing a single or mixed technology solution from the list of the following technologies:

- Fiber-optic technology
- HFC Technology
- DSL Technology
- Licensed Fixed Wireless
- Unlicensed Fixed Wireless
- LEO Satellite

Applicants will have the opportunity to propose from the following options:

- Option 1: Proposing 100% BSLs in the Project Area with a single or a mixed technology solution(s)

Note: The Applicant can choose to propose a 100% Priority Broadband Project or a 100% Non-Priority Broadband Project.

If choosing to propose both Priority BSLs and Non-Priority BSLs, Applicants should include at least 90% of BSLs under the Priority Broadband Project category ensuring they meet future scalability and performance standards, and classify the remaining BSLs as Non-Priority, where scalability standards are not applicable.

The ACA will initially review the Priority BSLs and, if necessary, will then evaluate the Non-Priority BSLs.

During evaluation, both the Priority and Non-Priority projects will be individually reviewed and scored.

- Option 2: Proposing select BSLs in the Project Area to serve with a single or a mixed technology solution(s) and excluding select BSLs from the Project Area. Applicants will be required to include at least 90% of the Unserved and Underserved BSLs in the Project Area under Option 2 to be considered for further evaluations and scoring.

Project Applications providing the most technically feasible and cost-effective solution for affordable broadband deployment through the BEAD Program will be prioritized.

For evaluation purposes, the Reference Price (Subsidy Available) for the selected Project Area will be pro-rated based on the number of proposed BSLs included in the Project Application.

Applicants should include any additional details or information deemed relevant to the Project.

#### **(Attachment 1 – Project Executive Summary)**

## **6.3 Project Infrastructure**

### **6.3.1 Project Type**

Applicants must select whether they plan to develop a Priority and/or Non-Priority Broadband Project for each Project Area included in the application. It is important to note that different scoring rubrics will be applied to Priority and Non-Priority Projects (Refer to Appendix C – BEAD Program Application Scoring Rubric), with preference for Priority Projects.

Note: If choosing to propose both Priority BSLs and Non-Priority BSLs with at least 90% of BSLs under the Priority Broadband Project category and the remaining BSLs as Non-Priority, Applicants should select both the Priority Broadband Project and Non-Priority Broadband Project options on the Application portal. The BSLs included under each category will be evaluated based on the applicable scoring criteria under Priority Broadband Projects and/or Non-Priority Broadband Projects.

Project Types are defined below:

- Priority Broadband Projects: The term “Priority Broadband Project” means a Project that provides broadband service at speeds of no less than 100 megabits per second (Mbps) for downloads and 20 Mbps for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.
- Non-Priority Broadband Projects: The term “Non-Priority Broadband Project” means a Project that provides broadband service no less than 100 Mbps for downloads and 20 Mbps for uploads, has a latency less than or equal to 100 milliseconds, but does not necessarily meet the statutory scalability requirements to 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.

ACA has a strong preference towards Priority Broadband Projects where it is financially feasible.

### **6.3.2 Project Technology and Infrastructure**

After selecting Priority and/or Non-Priority Broadband Project status, Applicants will be required to select from the proposed single or mixed technology options that they plan to deploy for the proposed Project Area from the drop-down list on the application portal and provide the details for the applicable questions for each selected technology.

#### **6.3.2.1. Priority Broadband Project**

For Priority Broadband Projects, the available technology options will be:

- Fiber-Optic Based Deployment
- Hybrid Fiber-Coaxial Based Deployment
- DSL Based Deployment
- Licensed Fixed Wireless Based Deployment
- Unlicensed Fixed Wireless Based Deployment
- LEO Satellite Based Deployment

Applicants can select from the proposed single or mixed technology options listed below that they plan to deploy for the proposed Project Area, as applicable. The required details for each of the proposed technology options above are described below:

#### **1. Fiber-Optic Based Deployment**

If the Applicant is planning to propose a Fiber-Optic Based Deployment, the Applicant will select the applicable network technologies and associated speeds that are proposed to be used for the delivery of internet connectivity. The list of applicable network technologies and associated speeds include:

- FCC Code 50: XGS-PON: Up to 10 Gbps download and 10 Gbps upload or greater
- FCC Code 50: XG-PON: Up to 10 Gbps download and 2.5 Gbps upload
- FCC Code 50: G-PON: Up to 2.5 Gbps download and 1 Gbps upload
- FCC Code 50: E-PON: Up to 1 Gbps symmetrical
- Other – Please specify (i.e., 10G E-PON)

Based on the selection of the applicable technologies, Applicants will include the following details:

- Total estimated miles of conduit to be deployed (Note: This mileage should be included in the buried fiber plant mileage)
- Total estimated miles of buried fiber plant to be deployed
- Total estimated miles of aerial fiber plant to be deployed



- Confirm that for deployment that involves laying fiber-optic cables or conduit(s) underground or along a roadway, the proposed Project will include interspersed conduit access points at regular and short intervals

Additionally, Applicants will specify the following details of the proposed technology:

- Upstream capacity per PON port (Mbps)
- Downstream capacity per PON port (Mbps)
- Number of PON ports per OLT (#)
- Backhaul capacity per OLT Downstream (Mbps)
- Backhaul capacity per OLT Upstream (Mbps)
- Year-over-year per subscriber average data traffic growth (%) assumed for the Upstream traffic
- Year-over-year per subscriber average data traffic growth (%) assumed for the Downstream traffic

**Split Ratio for Deployment:** Applicants will also be required to select the split ratio that will be used for deployment if the same split ratio is proposed to be used across the deployment:

- Split Ratio 1:32
- Split Ratio 1:64
- Other – Please Specify

If the same split ratio is not used across deployment, the Applicant will provide a narrative response with the reasons and identify the nodes that do not conform to it.

The Applicant should also describe how the proposed technology will be used to scale subscriber speeds and capacity over time to meet the evolving connectivity needs of households and businesses. Applicants will also indicate how the proposed technology will assist in the development of other advanced services.

## **2. Hybrid Fiber-Coaxial Based Deployment**

If the Applicant is planning to propose a HFC Based Deployment, the Applicant will select the applicable network technologies that are proposed to be used for the delivery of internet connectivity to from the following:

- FCC Code 40: HFC DOCSIS 4.0
- FCC Code 40: HFC DOCSIS 3.1

**Split Specification for Deployment:** Based on the selected option, Applicants will also be required to select the split ratio that will be used for deployment between:

- Mid Split (DOCSIS 3.1)
- High Split (DOCSIS 3.1, DOCSIS 4.0)
- Full Duplex (DOCSIS 4.0)

Additionally, the Applicants should specify the following details about the proposed technology option:

- Total estimated miles of buried coaxial cable plant to be deployed
- Maximum number of subscribers planned per service group

- Upstream capacity per service group (Mbps)
- Downstream capacity per service group (Mbps)
- Number of service groups per CMTS
- Backhaul capacity per CMTS Downstream (Mbps)
- Backhaul capacity per CMTS Upstream (Mbps)
- Year-over-year per subscriber average data traffic growth (%) assumed for the Upstream traffic
- Year-over-year per subscriber average data traffic growth (%) assumed for the Downstream traffic

The Applicant should also describe how the proposed technology will be used to scale subscriber speeds and capacity over time to meet the evolving connectivity needs of households and businesses. Applicants will also indicate how the proposed technology will assist in the development of other advanced services.

Based on the proposed solution for HFC Based Deployment, Applicant will also provide the following deployment-related mileage information:

- Before HFC Node: Total Fiber Aerial Mileage
- Before HFC Node: Total Fiber Buried (Under Ground) Mileage
- Before HFC Node: Total Estimated Conduit Mileage (Note: This mileage should be included in the buried fiber plant mileage)
- After HFC Node: Total Coax Aerial Mileage
- After HFC Node: Total Coax Buried (Under Ground) Mileage
- After HFC Node: Total Estimated Conduit Mileage (Note: This mileage should be included in the buried coax plant mileage)

### **3. Digital Subscriber Line (DSL) Based Deployment**

If the Applicant is planning to propose a Digital Subscriber Line Based Deployment, the Applicant will select the applicable profile proposed to be used for the delivery of internet connectivity from the following:

- FCC Code 12: VDSL: Up to 230 Mbps download and 100 Mbps upload
- Profile 17a
- Profile 30a
- Profile 35b
- Other profile, if any

Additionally, the Applicants should specify the following details about the proposed technology option:

- The maximum loop length the Applicant is planning to support (feet)
- Upstream capacity per DSL port (Mbps)
- Downstream capacity per DSL port (Mbps)
- Use of pair bonding, if applicable

- Use of vectoring, if applicable
- Number of DSL ports per DSLAM (#)
- Backhaul capacity per DSLAM Downstream (Mbps)
- Backhaul capacity per DSLAM Upstream (Mbps)
- Year-over-year per subscriber average data traffic growth (%) assumed for the Upstream traffic
- Year-over-year per subscriber average data traffic growth (%) assumed for the Downstream traffic

The Applicant should also describe how the proposed technology will be used to scale subscriber speeds and capacity over time to meet the evolving connectivity needs of households and businesses. Applicants will also indicate how the proposed technology will assist in the development of other advanced services.

Based on the proposed solution for DSL Based Deployment, Applicant will also provide the following deployment-related mileage information:

- Before remote DSLAM Node: Total Fiber Aerial Mileage
- Before remote DSLAM Node: Total Fiber Buried (Under Ground) Mileage
- Before remote DSLAM Node: Total Estimated Conduit Mileage (Note: This mileage should be included in the buried fiber plant mileage)
- After DSLAM Node: Total Copper Aerial Mileage
- After DSLAM Node: Total Copper Buried (Under Ground) Mileage
- After DSLAM Node: Total Estimated Conduit Mileage (Note: This mileage should be included in the buried copper plant mileage)

#### **4. Licensed Fixed Wireless Based Deployment**

If the Applicant is planning to propose a Licensed Fixed Wireless Based Deployment, the Applicant will select the following option to be used for the delivery of internet connectivity:

- FCC Code 71: Wireless using licensed spectrum 4

Additionally, the Applicants should specify the following details about the proposed technology option:

- List the spectrum bands licensed for its organization
- Downstream subscriber bandwidth capacity per sector (Mbps)
- Upstream subscriber bandwidth capacity per sector (Mbps)
- Maximum number of subscribers planned per sector
- Spectrum band(s) used in each Project Area / application. Additionally, list the Channel Width for the spectrum band(s)
- Radiation Center and Azimuth of each sector(s) of the tower
- Backhaul link capacity Downstream per tower (Mbps). Additionally, specify whether the backhaul is fiber or wireless. If it is wireless, provide the frequency used and specify whether it is licensed or unlicensed

- Backhaul link capacity Upstream per tower (Mbps). Additionally, specify whether the backhaul is fiber or wireless. If it is wireless, provide the frequency used and specify whether it is licensed or unlicensed
- Year-over-year per subscriber average data traffic growth (%) assumed for the Upstream traffic
- Year-over-year per subscriber average data traffic growth (%) assumed for the Downstream traffic

The Applicant should also describe how the proposed technology will be used to scale subscriber speeds and capacity over time to meet the evolving connectivity needs of households and businesses, while also supporting the deployment of 5G, successor wireless technologies, and other advanced services.

Additionally, the Applicant will provide the following details about the proposed towers for deployment:

- Number of towers proposed to be deployed as part of the Project
- Number of towers to be co-located
- Number of towers new build
- A narrative on the number of towers proposed to be deployed indicating if it would be a new build or colocation deployment. Additionally, the Applicant will indicate whether these towers will be owned by the Applicant's organization or if the Applicant is planning to lease these towers from another entity.

## **5. Unlicensed Fixed Wireless Based Deployment**

If the Applicant is planning to propose a Unlicensed Fixed Wireless Based Deployment, the Applicant will select the following option to be used for the delivery of internet connectivity:

- FCC Code 70: Wireless using licensed spectrum 2

Additionally, the Applicants should specify the following details about the proposed technology option:

- For unlicensed wireless spectrum, list the spectrum bands for the Applicant's organization:
- Downstream subscriber bandwidth capacity per sector (Mbps)
- Upstream subscriber bandwidth capacity per sector (Mbps)
- Maximum number of subscribers planned per sector
- Spectrum band(s) used in each Project Area / application
- Radiation Center and Azimuth of each sector(s) of the tower
- Backhaul link capacity Downstream per tower (Mbps). Specify whether the backhaul is fiber or wireless. If it is wireless, the Applicant must provide the frequency used and specify whether it is licensed or unlicensed
- Backhaul link capacity Upstream per tower (Mbps). Specify whether the backhaul is fiber or wireless. If it is wireless, the Applicant must provide the frequency used and specify whether it is licensed or unlicensed
- Year-over-year per subscriber average data traffic growth (%) assumed for the Upstream traffic
- Year-over-year per subscriber average data traffic growth (%) assumed for the Downstream traffic

- How the Applicant's ULFWA network ensures reliable service in the presence of other interfering services using the same wireless spectrum.

The Applicant should also describe how the proposed technology will be used to scale subscriber speeds and capacity over time to meet the evolving connectivity needs of households and businesses, while also supporting the deployment of 5G, successor wireless technologies, and other advanced services.

Additionally, the Applicant will provide the following details about the proposed towers for deployment:

- Number of towers proposed to be deployed as part of the Project
- Number of towers to be co-located
- Number of towers new build
- A narrative on how the number of towers proposed to be deployed indicating if it would be a new build or colocation deployment. Additionally, the Applicant will indicate whether these towers will be owned by the Applicant's organization or if the Applicant is planning to lease these towers from another entity.

## **6. Low Earth Orbit (LEO) Satellite Based Deployment**

If the Applicant is planning to propose a Satellite Based Deployment, the Applicant will select the following option to be used for the delivery of internet connectivity:

- LEO Satellite Technology Deployment

Additionally, the Applicants should specify the following details about the proposed technology option:

- Downlink subscriber bandwidth capacity of each satellite (Mbps)
- Uplink subscriber bandwidth capacity of each satellite (Mbps)
- Maximum number of subscribers per satellite
- Backhaul link capacity Downlink per satellite (Mbps)
- Backhaul link capacity Uplink per satellite (Mbps)
- Year-over-year per subscriber average data traffic growth (%) assumed for the upstream traffic
- Year-over-year per subscriber average data traffic growth (%) assumed for the downstream traffic

For this proposed solution, Applicants should describe how the Applicant's LEO network ensures reliable service in the presence of other interfering services.

Applicants should also describe how the Applicant's proposed technology will be used to scale subscriber speeds and capacity over time to meet the evolving connectivity needs of households and businesses, while also supporting the deployment of 5G, successor wireless technologies, and other advanced services.

Additionally, the Applicant should describe how the Applicant will help ensure that sufficient LEO satellite technology capacity will be available to provide broadband service to all proposed locations within four years of the subgrant award by providing information on the following metrics to help assess the service capability and commitments using LEO satellite technology.

- **Satellite Deployment Schedule:** A detailed plan showing the number of satellites to be launched, their deployment timeline, and how these will contribute to coverage over time.

- **Bandwidth and Throughput Capacity:** Data demonstrating the aggregate bandwidth capability of the satellite network and expected throughput per user in different service areas.
- **Coverage Maps:** Projections detailing geographical areas that will be covered by the satellite constellation at various stages of deployment, ensuring consistent and reliable service.
- **Latency and Reliability Measurements:** Benchmarks for expected latencies based on existing deployments and measures of fault tolerance or redundancy in the network.
- **Infrastructure Readiness:** Assessment of ground infrastructure, including ground stations and user terminals, required to support service delivery and timelines for their deployment.

**(Attachment 2 – LEO Capacity)**

**6.3.2.2. Non-Priority Broadband Project**

For Non-Priority Broadband Projects, the available technology options will be:

- Hybrid Fiber-Coaxial Based Deployment
- DSL Based Deployment
- Licensed Fixed Wireless Based Deployment
- Unlicensed Fixed Wireless Based Deployment
- LEO Satellite Based Deployment

Applicants can select from the proposed single or mixed technology options listed below that they plan to deploy for the proposed Project Area, as applicable. The required details for each of the proposed technology options above are described below:

**1. Hybrid Fiber-Coaxial Based Deployment**

If the Applicant is planning to propose a Hybrid Fiber-Coaxial Based Deployment, the Applicant will select the applicable network technologies that are proposed to be used for the delivery of internet connectivity to from the following:

- FCC Code 40: HFC DOCSIS 4.0
- FCC Code 40: HFC DOCSIS 3.1

**Split Specification for Deployment:** Based on the selected option, Applicants will also be required to select the split ratio that will be used for deployment between

- Mid Split (DOCSIS 3.1)
- High Split (DOCSIS 3.1, DOCSIS 4.0)
- Full Duplex (DOCSIS 4.0)

Additionally, the Applicants should specify the following details about the proposed technology option:

- Total estimated miles of buried coaxial cable plant to be deployed
- Maximum number of subscribers planned per service group
- Upstream capacity per service group (Mbps)
- Downstream capacity per service group (Mbps)

The Applicant will also be required to provide the following deployment related mileage information:

- Before HFC Node: Total Fiber Aerial Mileage
- Before HFC Node: Total Fiber Buried (Under Ground) Mileage
- Before HFC Node: Total Estimated Conduit Mileage (Note: This mileage should be included in the buried fiber plant mileage)
- After HFC Node: Total Coax Aerial Mileage
- After HFC Node: Total Coax Buried (Under Ground) Mileage
- After HFC Node: Total Estimated Conduit Mileage (Note: This mileage should be included in the buried coax plant mileage)

## **2. Digital Subscriber Line (DSL) Based Deployment**

If the Applicant is planning to propose a Digital Subscriber Line Based Deployment, the Applicant will select the applicable profile proposed to be used for the delivery of internet connectivity from the following:

- FCC Code 12: VDSL: Up to 230 Mbps download and 100 Mbps upload
- Profile 17a
- Profile 30a
- Profile 35b
- Other profile, if any

Additionally, the Applicants should specify the following details about the proposed technology option:

- The maximum loop length the Applicant is planning to support (feet)
- Upstream capacity per DSL port (Mbps)
- Downstream capacity per DSL port (Mbps)
- Maximum number of subscribers planned per port

Based on the proposed solution for DSL Based Deployment, Applicant will also provide the following deployment-related mileage information:

- Before remote DSLAM Node: Total Fiber Aerial Mileage
- Before remote DSLAM Node: Total Fiber Buried (Under Ground) Mileage
- Before remote DSLAM Node: Total Estimated Conduit Mileage (Note: This mileage should be included in the buried fiber plant mileage)
- After DSLAM Node: Total Copper Aerial Mileage
- After DSLAM Node: Total Copper Buried (Under Ground) Mileage
- After DSLAM Node: Total Estimated Conduit Mileage (Note: This mileage should be included in the buried copper plant mileage)

## **3. Licensed Fixed Wireless Based Deployment**

If the Applicant is planning to propose a Licensed Fixed Wireless Based Deployment, the Applicant will select the following option to be used for the delivery of internet connectivity:

- FCC Code 71: Wireless using licensed spectrum 4

Additionally, the Applicants should specify the following details about the proposed technology option:

- List the spectrum bands licensed for its organization:
- Downstream subscriber bandwidth capacity per sector (Mbps)
- Upstream subscriber bandwidth capacity per sector (Mbps)
- Maximum number of subscribers planned per sector
- Spectrum band(s) used in each Project Area / application. Additionally, the Applicant should list the Channel Width for the spectrum band(s)

Additionally, the Applicant will provide the following details about the proposed towers for deployment:

- Radiation Center and Azimuth of each sector(s) of the tower
- Number of towers proposed to be deployed as part of the Project
- Numbers of towers to be co-located
- Number of towers new build
- A narrative on the number of towers proposed to be deployed indicating if it would be a new build or colocation deployment. Additionally, the Applicant will indicate whether these towers will be owned by its organization or the Applicant is planning to lease these towers from another entity.

#### **4. Unlicensed Fixed Wireless Based Deployment**

If the Applicant is planning to propose a Unlicensed Fixed Wireless Based Deployment, the Applicant will select the following option to be used for the delivery of internet connectivity:

- FCC Code 70: Wireless using licensed spectrum 2

The Applicants should specify the following details about the proposed technology option:

- For unlicensed wireless spectrum, the Applicant will list the spectrum bands for its organization
- Downstream subscriber bandwidth capacity per sector (Mbps)
- Upstream subscriber bandwidth capacity per sector (Mbps)
- Maximum number of subscribers planned per sector
- Spectrum band(s) used in each Project Area / application
- Radiation Center and Azimuth of each sector(s) of the tower

The Applicant will also describe how ULFWA network ensures reliable service in the presence of other interfering services using the same wireless spectrum.

Additionally, the Applicant will provide the following details about the proposed towers for deployment:

- Number of towers proposed to be deployed as part of the Project



- Number of towers to be co-located
- Number of towers new build
- A narrative on the number of towers proposed to be deployed indicating if it would be a new build or colocation deployment. Additionally, the Applicant will indicate whether these towers will be owned by its organization or if the Applicant is planning to lease these towers from another entity.

## 5. Low Earth Orbit (LEO) Satellite Based Deployment

If the Applicant is planning to propose a Satellite Based Deployment, the Applicant will select the following option to be used for the delivery of internet connectivity:

- LEO Satellite Technology Deployment

Additionally, the Applicants should specify the following details about the proposed technology option:

- Downlink subscriber bandwidth capacity of each satellite (Mbps)
- Uplink subscriber bandwidth capacity of each satellite (Mbps)
- Maximum number of subscribers per satellite
- Backhaul link capacity Downlink per satellite (Mbps)
- Backhaul link capacity Uplink per satellite (Mbps)

For this proposed solution, Applicants should describe how the Applicant's LEO network ensures reliable service in the presence of other interfering services.

Additionally, the Applicant should describe how the Applicant will help ensure that sufficient LEO satellite technology capacity will be available to provide broadband service to all proposed locations within four years of the subgrant award by providing information on the following metrics to help assess the service capability and commitments using LEO satellite technology.

- **Satellite Deployment Schedule:** A detailed plan showing the number of satellites to be launched, their deployment timeline, and how these will contribute to coverage over time.
- **Bandwidth and Throughput Capacity:** Data demonstrating the aggregate bandwidth capability of the satellite network and expected throughput per user in different service areas.
- **Coverage Maps:** Projections detailing geographical areas that will be covered by the satellite constellation at various stages of deployment, ensuring consistent and reliable service.
- **Latency and Reliability Measurements:** Benchmarks for expected latencies based on existing deployments and measures of fault tolerance or redundancy in the network.
- **Infrastructure Readiness:** Assessment of ground infrastructure, including ground stations and user terminals, required to support service delivery and timelines for their deployment.

### (Attachment 2 – LEO Capacity)

## 6.3.3 Network Performance

Applicants will be required to provide more details regarding network performance and upgrade needs.

### **6.3.3.1. Network Performance Roadmap**

Applicants must provide their network performance roadmap highlighting their network performance over the next 10 years from 2026 to 2036. The following information should be included in the network performance roadmap:

- Minimum peak time upstream data rate (Mbps)
- Minimum peak time downstream data rate (Mbps)
- Maximum peak time latency (ms)

Note: Peak Time is considered from 7 pm to 11 pm at subscriber location.

### **6.3.3.2. Network Upgrade Needs**

Applicants will be required to provide information on network performance from the current and future per subscriber capabilities point of view by providing the following details:

- The supported per subscriber downstream usage (in Mbps) at 100% take rate at 100% concurrent usage by 2036, without any additional costs that are not included in the current proposal for network upgrades.
- The supported per subscriber upstream usage (in Mbps) at 100% take rate at 100% concurrent usage by 2036, without any additional costs that are not included in the current proposal for network upgrades

These details will be evaluated on the ability of the proposed technological solution to meet the evolving connectivity needs as defined by ACA by the following:

**Calculation Assumptions:** To be technology independent in evaluating the evolving connectivity needs offering, the Applicant shall assume:

- A shared port is defined as the shared resource (such as a PON port, a DOCSIS service group, etc.) common across multiple subscribers.
- 100% take rate of the subscribers connected to a shared port
  - For example, if the subscriber assumes 1:64 split, 100% take rate implies that 64 subscribers are connected. If 256 subscribers are assumed in a DOCSIS service group, then 256 subscribers are connected.
- 100% concurrent usage of the subscribers on a shared port during the peak time
  - That is, all the subscribers on a shared port (for example, 64 active subscribers in 1:64 split PON configuration) are active at the same time.
- 2026 starting simultaneous downstream usage per subscriber is 5 Mbps
- 2026 starting simultaneous upstream usage per subscriber is 1 Mbps

Additionally, Applicants will be required to provide the following details:

- Starting per subscriber peak time data rates (in 2026) assumed in the Applicant's capacity planning:
  - Average per subscriber peak time upstream data rate assumed in 2026 (Mbps)
  - Average per subscriber peak time downstream data rate assumed in 2026 (Mbps)

- Describe how the Applicant's network will meet the growing subscriber bandwidth demand over the next 10 years.
- Confirm whether the proposed Project costs include future upgrades.
- If the proposed Project costs do not include the future upgrade costs, the Applicant will provide a detailed explanation of the future upgrade costs along with a detailed cost estimation for the complete Project deployment.

### **6.3.4 Reliability and Resiliency**

The Reliability and Resiliency section requires that the Applicants provide more details on technology reliability and resiliency, network reliability, and network outages.

#### **6.3.4.1. Technology Reliability and Resiliency**

Applicants must provide a description regarding the proposed risk management plans for ensuring the proposed technology infrastructure's reliability and resilience, including from natural disasters (e.g., wildfires, flooding, tornadoes, hurricanes, etc.). as applicable.

#### **6.3.4.2. Network Reliability**

Applicants must specify the following details regarding network reliability and describe the following:

- Minimum service availability (%) targeted for the Applicant's subscribers (% availability).
- How the Applicant's proposed network can provide reliable service during inclement weather (rain, snow, clouds, etc.) conditions.
- How the Applicant's proposed network can provide reliable service with other wireless services operating in the area.

#### **6.3.4.3. Network Outages**

Applicants must confirm that appropriate measures will be taken to ensure that the network's outages do not exceed, on average, 48 hours over any 365-day period except in case of natural disasters or other force majeure occurrences. In the case that Applicants are unable to meet this requirement, they must provide an explanation.

Applicants will describe the network design and measures that their organization is planning to take to address the requirements stated above. In the case of weather risks, Applicant will be required to provide details on the planned speeds of restoring service in case of the planned network outage.

Additionally, Applicants should provide details of any other network resiliency measures that the Applicant's organization plans to adopt.

## **6.4 Network Design**

Applicants must provide a high-level network design, showing a proposed network that will deliver broadband service meeting or exceeding the performance requirements to all locations served by the Project.

Applicants must submit the following information as applicable to the technology solution(s) they have proposed for the Project Area:

- GIS files of the Project Area's initial network design. After the provisional award of the subgrant, Applicants will also be required to submit GIS files of their final network design.
- Maps including proposed network path layer in GIS format. The path layer should distinguish between aerial and underground to the extent possible. Acceptable file types include PDF, SHP, KMZ/KML types.
- Location points, points containing network electronics and splitters, and polygons outlining all proposed service areas at a node-level.
- Identification of backhaul infrastructure and point(s) of internet connectivity.
- If applicable, Applicants should show their existing fiber or cable network routes within and in close proximity to the Project Area defined by the Applicant. Include any applicable information about these existing assets, such as fiber density, available capacity, year of deployment, etc.
- If the Project involves laying fiber-optic cables or conduits underground or along a roadway network, the network design should show the inclusion of preliminary interspersed conduit access points at regular and short intervals.
- If the Project involves a licensed and unlicensed fixed wireless application, the network design should demonstrate the planned deployment, capability, and sustainability of the proposed network. It should include a coverage map showing the geographical area the network will cover and indicating specific locations of towers and base stations. Additionally, the network's architecture should be outlined, specifying core components such as the backhaul, transmission points, antenna and base station types, and connectivity to the main internet infrastructure.

Applicants must confirm that the network design, diagram, project costs, build-out timeline and milestones for Project implementation will be certified by a licensed professional engineer prior to signing the grant agreement.

Additionally, Applicants must confirm if the Professional Engineer will be licensed in the State of Arizona. If the Professional Engineer will not be licensed in the State of Arizona, Applicants will explain if they intend to include the BEAD Program waiver on PE Certification.

BEAD Program – Conditional Limited Programmatic Waiver and Clarification of Professional Engineer Certification

*Note: Subgrantees will be required to submit final detailed network designs after award, but prior to ACA's approval to proceed to construction. Final detailed network designs must be certified by a Professional Engineer. Additionally, upon completion, the Subgrantee must obtain certification by a Professional Engineer confirming the deployed network was constructed and is operating as designed.*

### **(Attachment 3 – Network Design)**

## **6.5 National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA)**

Applicants will provide a high-level description of the site and the surrounding area (e.g., developed land versus open space; adjacent natural resources; and any protected lands) and any natural or manmade geographic, physical, or other factors such as weather, historic sites, wildlife, etc., that may pose a risk to

the development of the Project including details related to flood zones from Federal Emergency Management Agency (FEMA) floodplain maps ([Flood Maps | FEMA.gov](#)) and impacted wetland or waterways from US Fish and Wildlife Service's (USFWS) National Wetlands Inventory wetland maps ([Wetlands Mapper | U.S. Fish & Wildlife Service](#)). This narrative is applicable to each Project Area included in the Application.

Additionally, Applicants will provide detailed plans on how the Project will be implemented including outlining their approach to remaining compliant with the State Historical Preservation Act (SHPA), National Environmental Policy Act (NEPA) (42 U.S.C. part 4321 et seq.), National Historic Preservation Act (NHPA) (54 U.S.C. part 300101 et seq.), and any other environmental or national historic preservation requirements. Also, a completed NEPA plan for this Project should be submitted if it is in place.

Additionally, Applicants will also recommend feasible plans to minimize adverse environmental and historical preservation impacts.

**(Attachment 4 – NEPA Plan)**

## **6.6 Make Ready / Project Preparedness**

Applicants must describe the make-ready activities that their organization has already completed or has planned for the proposed Project (e.g., surveyed site, signed agreements, obtained necessary costs, prepared engineering designs, access to right of way, etc.). This description is applicable to each Project Area included in the Application. Applicants must include all prior activities, a complete description of the next steps for make-ready activity, and how Project costs were estimated.

## **6.7 Timeline**

Applicants will provide a Project timeline highlighting key milestones, and the number of months needed between signing of the grant agreement and the delivery of service to the last eligible BSL included in the Project Area.

For application evaluation purposes, Applicants will provide a detailed Project schedule with key implementation phases and milestones for 25%, 50%, 75%, and 100% completion for completing the Project within the 4-year timeline.

This may include stages such as contracting, engineering, pole licensing, make-ready, permitting, construction, connections, etc. Each milestone represents a specific stage of the Project's completion and the availability of service to the percentage of eligible BSLs and CAIs in the Project Area. The timeline should include a start date and expected end date for all phases.

Applicants are required to confirm that their organization will deploy the planned broadband network and begin providing services to each customer that desires broadband service within the Project Area not later than four (4) years after the date on which the Subgrantee receives the subgrant from ACA.

**(Attachment 5 – Project Schedule)**

## **6.8 Barrier and Permitting Requirements**

Applicants will identify any known critical crossings/permits related to the Project, for each Project Area included in the Application. Permits/Critical crossings may include, but are not limited to, the following:

- State of Arizona Managed Lands
  - Arizona Department of Transportation Managed Rights of Way (ROW)
  - Arizona Department of Environmental Quality
  - Arizona Department of Water Resources
  - Arizona State Land Department
  - Arizona State Parks and Trails
  - Arizona Game and Fish Department
  - Bridge and Railroads Tracks Crossings
  - Drain Crossings
  - Other Crossings [If selected, Applicants will provide an explanation for the same]
- Federal Government Managed Lands
  - Department of Defense Managed Lands and Properties
  - US Forest Service Managed Lands
  - Other Federal Managed Lands
  - US Fish and Wildlife Managed Lands
  - National Park Service Management Lands
  - Bureau of Land Management Managed Lands
  - Bureau of Reclamation Managed Lands
  - Railroad Crossings
  - Tribal Lands
  - Wetland Crossings
  - Significant Water Crossings
- Tribal Nations Managed Lands
  - Tribal Nations Managed Rights of Way
  - Bridge Crossings
  - Drain Crossings
  - Other Crossings [If selected, Applicants will provide an explanation for the same]
- Local Government Managed Lands
  - Local Government Managed Rights of Way
  - Bridge Crossings

- Drain Crossings
- Other Crossings [If selected, Applicants will provide an explanation for the same]

### **6.8.1 Barrier Identification**

Based on the selection above, Applicants will identify potential obstacles and challenges associated with each Project Area. Applicants will provide:

- Detailed description on the critical crossings/permits related to this Project. Additionally, Applicants will describe any steps or plans that their organization has undertaken with regards to the permitting processes for the identified critical crossings and/or permits.
- Detailed description of any concerns or issues encountered related to critical crossings or permits for the Project.
- Description on any potential supply chain issues and a plan to overcome them.
- Description on any workforce related issues that could potentially delay the Project deployment and a plan to overcome them.
- Description of potential concerns/issues related to inclement weather that may impact the timeline of this Project.
- Description on any other barriers or concerns that may impact the timeline of this Project.

## **6.9 Project Financials**

Applicants are required to confirm that they will use grant funds as specified in the BEAD NOFO and the BEAD Restructuring Policy Notice.

### **6.9.1 Letter of Credit (LOC)**

*Note: Please note that Applicants do not need to provide the actual Letter of Credit or the performance bond at the Pre-registration or Application phase. That will be required later in the process prior to final award, based on the actual amount to be awarded. (Sample LOC to be submitted prior to the final award is provided in Appendix E)*

*At this Project Application phase, an Applicant must submit a commitment to provide the Letter of Credit or performance bond, up to a specified dollar amount.*

*The commitment to provide a Letter of Credit must be a letter from an eligible bank or from a credit union that is insured by the FDIC and have a Weiss Bank Safety Rating of B- or higher, committing to provide such a Letter of Credit if an award is made, including reference to the terms of the Model Letter of Credit and a maximum amount for the Letter of Credit that the institution would be willing to provide.*

*The commitment to provide a performance bond must be a letter from a company holding a certificate of authority as an acceptable surety on federal bonds, as identified in the Department of Treasury Circular 570 committing to issue a Performance Bond reflecting the maximum bonding value that the company is willing to provide.*



*The submission requirements for a commitment letter for an LOC or a surety letter for a performance bond to be provided as part of this Project Application are further outlined in the options below:*

If opting for an LOC as per the BEAD NOFO and the BEAD Restructuring Policy Notice, Applicants must confirm that they will obtain and submit an LOC from a bank on a per Project basis in the amount of 25% of the subaward prior to the signing the grant agreement.

If confirmed, Applicants must submit a letter from a bank meeting the eligibility requirements consistent with those set forth in 47 C.F.R. § 54.804(c)(2) committing to issue an irrevocable standby letter of credit in a value of no less than 25 percent of the subaward amount.

Additionally, Applicants must also confirm that they will also submit an opinion letter from legal counsel clearly stating, subject only to customary assumptions, limitations, and qualifications, that in a proceeding under Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”), the Bankruptcy Court would not treat the letter of credit or proceeds of the letter of credit as property of the winning Subgrantee’s bankruptcy estate under Section 541 of the Bankruptcy Code prior to signing the grant agreement.

**(Attachment 6 – Commitment Letter for LOC)**

## **6.9.2 LOC – Waiver Options**

BEAD originally mandated that states require deployment Subgrantee to obtain a Letter of Credit from an eligible bank valued at least 25% of an award’s amount as described in 5.11.1-Letter of Credit above. However, the NTIA subsequently issued a Notice of Programmatic Waiver allowing states to ease this requirement. The notice provided four different options for extending additional flexibility to Subgrantees. If applying for an LOC waiver, Applicants will be required to choose and confirm whether their organization will obtain and submit for each Project Area from the options detailed out below:

- **Option # 1- LOC from a Credit Union:** Subgrantee may obtain the Letter of Credit from a credit union substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF). Subgrantees can use any United States credit union that:
  - (a) is insured by the National Credit Union Administration; and
  - (b) has a credit union safety rating issues by Weiss of B- or better
- **Option # 2 - Performance Bond:** Subgrantee may obtain a qualified performance bond instead of obtaining a Letter of Credit from a company holding a certificate of authority as an acceptable surety on federal bonds as identified in the Department of Treasury Circular 570 in a value of no less than 100 percent of the subaward amount.
- **Option # 3 - Reduction of LOC upon completion of Project milestones:** Subgrantee may step down the amount of the Letter of Credit or performance bond based on progress toward completion of Project milestones.
- **Option # 4 - Alternative initial 10% LOC or 10% Performance Bond:** Subgrantee may obtain a Letter of Credit or performance bond for only 10% of the subaward amount if:
  - ✓ ACA issues funding on a reimbursable basis;
  - ✓ The reimbursement for periods of no more than six months; and



- ✓ The Subgrantee commits to maintain a letter of credit or performance bond in the amount of 10% of the subaward until it has demonstrated to satisfaction of ACA that it has completed the buildout of 100% of locations to be served by the Project or until the period of performance of the subaward has ended, whichever occurs first.

ACA is adopting Options # 1, # 2, and # 4 for all technologies and Option # 3 as applicable to LEO Satellite technology as outlined in the BEAD Restructuring Notice published on June 6, 2025 by NTIA.

For availing the ACA BEAD Program's LOC waivers, Applicants can select one of the below options (Option # 1, # 2, #3 for LEO or # 4) for each Project Area included in the Application. Additionally, Applicants will need to provide supporting documentation regarding the financial surety option selected below:

**If Option # 1 - LOC from a Credit Union** is selected, Applicants will confirm that their organization will obtain and submit a Letter of Credit on a per Project basis in the amount of 25% of the subaward prior to the final award from a credit union.

If Applicants provide confirmation to the above, they must confirm that the Letter of Credit from a credit union will be substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF) and will use any United States credit union that is insured by the National Credit Union Administration; and has a credit union safety rating issued by Weiss of B- or better.

If confirmed, Applicants must submit a commitment letter from the credit union committing to issue an LOC to the Subgrantee valued at no less than 25% of the subaward amount prior to signing the grant agreement.

In addition to a Letter of Credit, Applicants will need to confirm their organization will also submit an opinion letter from legal counsel clearly stating, subject only to customary assumptions, limitations, and qualifications, that in a proceeding under Title 11 of the United States Code, 11 U.S.C. § et seq. (the "Bankruptcy Code"), the bankruptcy court would not treat the letter of credit as property of the winning Subgrantee's bankruptcy estate under Section 541 of the Bankruptcy Code prior to signing the grant agreement.

#### **(Attachment 6 – Commitment Letter for LOC)**

**If Option # 2 – Performance Bond** is selected, Applicants must confirm the following:

- Organization will provide a Performance Bond equal to 100% of the BEAD subaward amount in lieu of a Letter of Credit on a per Project basis, acceptable in all respects to ACA prior to signing of the grant agreement.
- Performance Bond will be issued by a company holding a certificate of authority as an acceptable surety on federal bonds, as identified in the Department of Treasury Circular 570.

If Applicant confirms the above, they must submit a letter from an acceptable surety company committing to issue a Performance Bond to the prospective Subgrantee. The letter must reflect the bonding amount equal to the total subaward. (*Sample Surety Letter to be submitted with this Project Application is provided in Appendix F*)

#### **(Attachment 7 – Surety Letter for Performance Bond)**

**If Option #3 – Reduction of LOC or Performance Bond upon Completion of Milestones** for LEO is selected, Applicants must confirm the following:

- Organization will provide a certification of availability of service to each location in the Project Area for consideration to reduce its LOC or performance bond by 50%, ensure the subscription rate reaches at

least 25% of all locations in the Project Area for reduction by an additional 25% of the original amount, and considered for close out once the subscription percentage reaches 50%.

If the Applicant provides confirmation to the above, Applicants must submit a letter from a bank committing to issue an irrevocable standby Letter of Credit that meets the Program eligibility requirements consistent with those set forth in 47 C.F.R. § 54.804(c)(2). This should be valued at no less than 25% of the subaward amount, or submit a letter from an acceptable surety company committing to issue Performance Bond to the prospective Subgrantee. The letter must reflect bonding amount equal to at least 100% of the subaward for the Project.

**(Attachment 6 – Commitment Letter for LOC)**

**OR**

**(Attachment 7 – Surety Letter for Performance Bond)**

**If Option # 4 - Alternative initial 10% LOC or 10% Performance Bond** is selected, Applicants must confirm the following:

- Organization commits to maintain a letter of credit or performance bond in the amount of 10% of the subaward until it has demonstrated to satisfaction of the ACA that it has completed the buildout of 100% of locations to be served by the Project or until the period of performance of the subaward has ended, whichever occurs first.

If Applicant confirms the above, Applicants must submit a letter from the bank committing to issue an irrevocable standby Letter of Credit from a bank that meets the Program eligibility requirements consistent with those set forth in 47 C.F.R. § 54.804(c)(2). This should be valued at no less than 10% of the subaward amount; or

If Applicant confirms the above, Applicants must submit a letter from an acceptable surety company committing to issue Performance Bond to the prospective Subgrantee. The letter must reflect bonding amount equal to at least 10% of the subaward for the Project.

**(Attachment 6 – Commitment Letter for LOC)**

**OR**

**(Attachment 7 – Surety Letter for Performance Bond)**

### **6.9.3 Project Match**

Applicants will provide summary information about the Project funding sources on the Application portal and in the Project Financials Workbook.

Note: Arizona will regard all cash, loans, federal grants, and state grants as cash match.

Please note that the details on the portal must match the numbers provided in the Project Financials Workbook.

Category	Total
Total Project Cost	\$ -

Total Grant Amount Requested	\$ -
Total Applicant Match Amount	\$ -
Total Match Percentage ( <i>Must be Min. of 25% w/o waiver</i> )	%

### 6.9.4 Matching Funds Details

Applicants will provide details of matching funds in the table below and submit evidence of the committed matching funds (e.g., letter from bank stating the loan amount). Additionally, Applicants will upload evidence of the committed matching funds to the Project Application portal (e.g., letter from bank stating the loan amount).

Note: ACA will regard all cash, loans, federal grants, and state grants as cash match.

#### (Attachment 8 – Project Matching Funds)

Match Sources Type	Amount	Secured (Yes /No)
Cash	\$ -	Y/N
Loan(s)	\$ -	Y/N
Federal Grant	\$ -	Y/N
In-Kind	\$ -	Y/N

#### 6.9.4.1. In-Kind Matching Funds

In addition to Cash Match, matching funds may be provided in the form of in-kind contributions, as long as such contributions are made consistent with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards set forth at 2 C.F.R. Part 200.

In-kind contributions, which may include third-party in-kind contributions, are non-cash donations of property, goods, or services, which benefit a federally assisted Project, and which may count toward satisfying the non-federal matching requirement of a Project's total budgeted costs when such contributions meet certain criteria. The Program allows for in-kind matches from non-federal sources, such as private entities, state and Local Governments, and tribal governments that can be used to cover the costs of construction of broadband infrastructure.

Depending on the particular property or service and the applicable federal cost principles, in-kind match could include:

- Employee or volunteer services
- Equipment

- Supplies
- Indirect costs
- Computer hardware and software items that were purchase no later than 1 year prior to the execution of the grant agreement
- Use of facilities

In the broadband context this could also include consistent with federal cost principles:

- Access to rights of way
- Pole attachments
- Conduits
- Easements, or
- Access to other types of infrastructure

### **6.9.5 Matching Waiver Request (Conditional)**

Applicants need to confirm if their Project Area includes high-cost areas

Applicants will also need to confirm their intention to apply for a match waiver. The waiver request should describe the special circumstances underlying the reason it is not feasible to provide the minimum match requirement of 25% of the project cost. Additionally, they must document any efforts made to obtain matching fund commitments for the Project from capital funding sources and explain how a waiver would serve the public interest and advance the goals of the BEAD Program. Note: Match waivers are not guaranteed, and ACA may request additional information to assist in making its determination.

#### **6.9.5.1. How to Request a Match Waiver**

Applicants will submit a match waiver request to ACA, who will then share the request with the Assistant Secretary for the final determination. This request should describe the special circumstances underlying the request and explain how a waiver would serve the public interest and effectuate the purposes of the BEAD Program. The Assistant Secretary retains the discretion to waive any amount of the match, including up to the full 25% requirement. Additionally, ACA may request further information to assist in making its determination.

### **6.9.6 Project Cost Estimation**

Applicants are required to provide the following Project cost details to serve proposed eligible BSLs and CAIs in the Project Area for the technology solution(s) they are proposing for in the Project Financials Workbook: **(Attachment 9 – Project Financials Workbook)** separately for Priority and/or Non-Priority Project tabs.

Note: The Total Project Cost estimation and the Project Financials Summary Output in the workbook should include the combined estimation for all proposed Priority BSLs and/or Non-Priority BSLs and CAIs to be served in the Project Application for the selected Project Area.

If an Applicant decides to propose both Priority and Non-Priority BSLs for the same Project Area, the Applicant is required to complete the combined "Cost Estimation" tab for the Project Area followed by BSLs level information in the relevant tabs for "Priority BSLs" and "Non-Priority BSLs" in the workbook.

Technology Deployment - BSLs			
Applicants must provide the proposed number of BSLs, the average cost to serve per BSL, and the total cost to serve the selected BSLs in the Project Areas for the list of proposed technologies.			
Number of BSLs to be Served with the proposed technology	Technology Type	Average cost to Serve per BSL	Total Cost to Serve the Proposed BSLs for selected technology
	<Dropdown List>	\$	\$
	<Dropdown List>	\$	\$
	<Dropdown List>	\$	\$
Total Project Cost to serve proposed Unserved and Underserved BSLs in the Project Area			
Technology Deployment - CAIs			
If proposing to serve CAIs, Applicants have to provide the number of CAIs, the average cost to server per CAI, and the total cost to serve the proposed CAIs with fiber technology for Priority Projects.			
Number of CAIs to be Served	Technology Type	Average cost to Serve per CAI with Fiber Technology	Total Cost to Serve the Proposed CAIs with Fiber Technology
	Fiber Based Deployment <Dropdown options>	\$	\$
Total Project Cost to serve proposed BSLs and CAIs in the Project Area.			
Excluded Locations			

If the Applicant plans to exclude select BSLs from the Project Area in its application, Applicants will have to provide the number of BSLs and the locations IDs for those locations.

**Number of BSLs**

**Location IDs**

Additionally, Applicants must confirm that the Project cost information presented in Attachment 9 – Project Financials Workbook is accurate for the Project Area. Note that ACA requires that the Project cost provided should include all costs, and that the Project cost should not be subject to any conditions. Applicants can provide any additional information, as necessary.

### **6.9.7 Project Financials Workbook (Detailed Information Intake)**

Applicants will be required to populate and upload the Project Financials excel workbook, which can be found in on the Project Application portal and will include detailed information covering:

- High-level Project budget information
- Capital costs
- Operating costs
- Breakdown of BSLs proposed to be served by technology type and cost to serve each BSL
- List of CAIs, proposed technologies, and cost to serve
- Details on funding sources and matching
- Capital investment schedule that demonstrates that the Applicant will achieve complete build-out and service initiation within four years of the final award
- Project pro forma financials and cashflow
  - The duration should be for not less than a 10-year period, or the length of any expected debt or capital leases, whichever is longer.
  - Applicants will identify any periods during which the Project is expected to have a net operating revenue loss and identify the expected source of funds to cover such losses.
  - Applicants will demonstrate the availability of funds to cover all Project costs exceeding the grant amount, along with the ongoing financial capacity to meet eligible Project expenses.
  - Applicants will also include the following in Attachment 9 – Project Financials workbook:
    - Revenue and Operating Expenses
    - Net Operating Revenue
    - Net Income
    - Unlevered and Levered Free Cash Flows
    - Other Capital Sources

- Net Cash

In the Project Application, Applicants will also provide budget narrative that explains the assumptions used in the pro forma and any expected financial challenges. Additionally, Applicants will provide any additional related analyses that establish the sustainability of the proposed Project.

**(Attachment 9 – Project Financials Workbook)**

## **6.10 Fair Labor and Employment Laws**

Applicants will provide the following information related to fair labor and employment laws. It is important to note that these questions may have already been answered during the preregistration phase. If not answered at the preregistration phase, then these questions are Project-specific and must be answered as part of the current application phase.

If not submitted during the preregistration phase, Applicants must submit a signed self-certification of compliance with federal and State labor and employment laws for the past three years by an Officer/Director-level employee of the entity (e.g., President, Chief Executive Officer, Chief Financial Officer, Treasurer, or equivalent position). It should also certify that the Applicant will plan to comply with applicable federal and state labor and employment laws for BEAD-funded Projects.

If a new provider, the Applicant must commit to robust labor and employment standards and protections, including compliance with federal labor and employment laws for BEAD-funded Projects in the future.

In case of a violation in the last three years, the Applicant must disclose the nature of the violation and the corrective steps taken to avoid similar incidents and ensure future compliance.

Based on the information provided to the above requirements, Applicants must certify that they have disclosed any instances in which it has been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.

**(Attachment 10 – Certification on Fair Labor and Employment Laws)**

## **6.11 Local Community Collaboration**

Applicants must engage in consultations with Local Government entities and/or tribal nations that intersect the proposed Project Area. Applicants must indicate if they have consulted with Local Government entities and/or tribal nations to discuss qualifications and plans within the Project Area. This confirmation is applicable to each Project Area included in the Application.

As per the state statute - 41-2702 on “Solicitation and award of grant applications”, Applicants should confirm that its organization has consulted with Local government entities and Tribal Authorities regarding the Applicant’s qualifications and plans within the Project Area.

Applicants will confirm that its organization has received a letter of consent/ collaboration from Local and Tribal Governments.

- If yes, Applicants must submit the letter of consent/collaboration on the portal.
- If no, the Applicant will confirm that its organization will receive a letter of consent/collaboration from Local and Tribal Governments prior to signing the grant agreement.

**(Attachment 11 – Letter of Consent/Collaboration)**

## 6.12 Low-Cost Service Option

Applicants will provide details of the low-cost service option for the 100/20 Mbps service and latency performance of no more than 100 milliseconds in the Project Area for the performance period as defined under the NTIA BEAD Restructuring Policy Notice published on June 6<sup>th</sup>, 2025 after Project completion. The price must include all recurring charges to subscribers, including all taxes, fees, and charges imposed on the subscriber, and detail all non-recurring fees.

Minimum Speed	Monthly Cost	Non-recurring Fees
100 Mbps/20 Mbps	\$ -	

Regarding Low-Cost Broadband Service Option, Applicants must confirm the following which is applicable to each Project Area included in the Application:

- Confirm that at least one low-cost broadband service option will be provided for the entire service Territory of the proposed Project
- Confirm that the Applicants that already offer a low-cost plan that meets the mentioned service requirements may propose to offer their existing low-cost plan to eligible subscribers, if applicable
- Confirm that the Applicant will ensure that eligible subscribers applying for the low-cost service option are households eligible for the FCC’s Lifeline Program (47 C.F.R. Part 54, Subpart E et seq. - Universal Service Support for Low-Income Consumers).
- Confirm that end users are allowed to apply the Lifeline subsidy to the service price
- Confirm that prospective consumers will be informed of the existence of the Lifeline Program benefits and the process of enrollment and application for the subsidies

Applicants must describe/upload details of an existing or proposed low-cost broadband service plan. The details should explain subscriber qualifications, speed, latency, cost, and any available subsidies for subscribers. **(Attachment 12 – Low-Cost Service Plan)**

Regarding Service Characteristics Requirements, Applicants must confirm the following:

- Confirm that the service will consistently and reliably provide download speeds of at least 100 Mbps and upload speeds of at least 20 Mbps
- Confirm that the service will provide typical latency measurements of no more than 100 milliseconds
- Confirm that the service is not subject to data caps, surcharges, or usage-based throttling, and adheres only to the same acceptable use policies that apply to all other broadband internet access service plans offered to home subscribers
- Confirm that the service will be installed within 10 calendar days of a service request once the network is operational

For allowing the Ability to Upgrade, Applicants must also confirm and provide details that in the event their organization later offers a low-cost plan with higher downstream and/or upstream speeds, they will allow



eligible subscribers who are already subscribed to a low-cost broadband service option to upgrade to the new low-cost offering at no cost.

In case Applicants confirms the above, they must provide plans to upgrade the low-cost broadband service option.

## **6.13 Cybersecurity and Supply Chain Risk Management Compliance**

### **6.13.1 Cybersecurity Risk Management Plan**

Applicants will be required to submit a cybersecurity management plan. If not submitted during the preregistration phase or if further updates have been made to the plan submitted during the preregistration phase, Applicants should submit the latest updated plan as part of the Project Application. If significant changes are made to the plan, a new version should be promptly submitted to ACA within 30 days (applicable until the end of the period of performance). In the case of prospective Subgrantees who are not yet providing service, they must demonstrate readiness to operationalize the cybersecurity risk management plan upon providing service after the grant is awarded.

#### **(Attachment 13 – Cyber Security Risk Management Plan)**

Applicants must provide their cybersecurity risk management plan that includes the following criteria:

- Operational status: The potential Applicant must have a cybersecurity risk management plan that is operational before a grant is awarded if the potential Applicant is already providing services prior to the grant award. In the case of potential Applicants who are not yet providing service, they must demonstrate readiness to operationalize the cybersecurity risk management plan upon providing service after the grant is awarded.
- NIST Framework and Executive Order Compliance: The cybersecurity risk management plan must be based on the latest available version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity, which is currently Version 2.
- Security and Privacy Controls: The plan must also adhere to the standards and controls outlined in Executive Order 14028 and must specify the particular security and privacy controls being implemented.
- Evaluation and Updates: Establish a process for periodic evaluation and assessment of the cybersecurity risk management plan. Ensure that the plan will be regularly reviewed and updated to address emerging cybersecurity risks and challenges/significant events.

Applicants are required to provide the detailed and the most updated plan prior to signing of the grant agreement.

### **6.13.2 Supply Chain Risk Management Compliance**

Potential Applicants are required to submit a supply chain risk management plan that is being used to safeguard the integrity of their supply chain. If not submitted during the preregistration phase or if further updates have been made to the plan submitted during the preregistration phase, Applicants should submit the latest updated plan as part of the Project Application. If significant changes are made to the plan, a new version should be promptly submitted to ACA within 30 days (applicable until the end of the period of performance). In the case of prospective Subgrantees who are not yet providing service, they must

demonstrate readiness to operationalize the cybersecurity risk management plan upon providing service after the grant is awarded.

#### **(Attachment 14 – Supply Chain Risk Management Plan)**

Applicants are required to submit a supply chain risk management plan that is being used to safeguard the integrity of their supply chain. The plan should comply with the following:

- Operational status: The potential Applicant must have a supply chain risk management plan that is operational before the grant is awarded if the potential Applicant is already providing services prior to the grant award. In the case of potential Applicants who are not yet providing service, they must demonstrate readiness to operationalize the supply chain risk management plan upon providing service after the grant is awarded.
- Key Practices and Guidance: The supply chain risk management plan must be based on the key practices described in the NIST publication NISTIR 8276, "Key Practices in Cyber Supply Chain Risk Management: Observations from Industry." The plan must also incorporate relevant supply chain risk management guidance from NIST, including NIST 800-161, "Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations." The plan should clearly specify the supply chain risk management controls that will be implemented.
- Evaluation and Updates: The supply chain risk management plan must be reevaluated and updated on a periodic basis. The plan should be regularly reviewed and updated as events warrant to address evolving supply chain risks and challenges/significant events.

In accordance with the BEAD Initial Proposal Volume II guidance, Applicants that rely on network facilities owned or operated by a third party must obtain cybersecurity and supply chain risk management processes and procedures from that network provider and provide the results.

Applicants are required to provide the detailed and the most updated plan prior to signing of the grant agreement.

## **6.14 Certifications**

Applicants will be asked to confirm compliance with the following for each Project Area included in the Application:

- Acknowledge that the grant application creates a binding obligation if accepted by ACA and cannot be withdrawn once submitted until ACA announces the conclusion of BEAD award process.
- Certify that their organization can and will commit to the grant application and that, if granted a grant award, any inconsistency or failure to follow-through on application details shall be considered a violation of the grant agreement and subject to claw-back of funds, at the discretion of ACA.
- Certify that their organization will adhere to prohibited communications rules as defined by the FCC until ACA announces final awards at the end of the BEAD award process.
- Certify that neither the Applicant nor any of its principals: (i) are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this Program by any Federal, State, or Local department or agency; and (ii) have not, within a three-year period preceding this certification, been convicted of or had a civil judgment for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public contract or grant, nor are presently indicted for such offenses.

- Confirm an agreement to comply with the BEAD requirements, including a non-collusion affidavit that the prices quoted in their applications have been independently determined, and that there has been no collusion with competing prospective contractor(s).
- Certify that their organization will engage in fair business practices such as grant application safeguards against collusion, bias, conflicts of interest, arbitrary decisions, and other factors that could undermine confidence in the public process.
- Confirm that their organization understands that the grant may be implemented on a cost reimbursement basis for actual costs incurred, consistent with Section IV.C.1.b of the NOFO, with reimbursement periods of no more than six (6) months.
- Confirm that their organization understands that an amount equivalent to 10 percent (10%) of the amount shown to be due on each payment request will be withheld until the Project has been completed, and a final closeout review has been performed.
- Confirm that their organization will submit timely quarterly progress reports, commit to the details of their grant application, submit to technical reviews and financial audits, and uphold the grant agreement if awarded and signed.
- Acknowledge that all requested certifications asked throughout the applications are not exhaustive.
- Certify their organization will comply with the Infrastructure Investment and Jobs Act which explicitly prohibits Subgrantees from using BEAD funding to purchase or support fiber-optic cable and optical transmission equipment manufactured in the People's Republic of China unless a waiver is granted by the Assistant Secretary.
  - ✓ If no, Applicants will provide details of the waiver the Applicant is planning to apply for.
- Confirm that the Project will serve every Unserved and Underserved location proposed within the Project Area in their Project application.
- Certify their organization will comply with the National Environmental Policy Act (NEPA) (42 U.S.C. §§4321 et seq.) and National Historic Preservation Act (NHPA) (54 U.S.C. §§300101 et seq.) and any other environmental or national historic preservation requirements.
- Certify that their organization understands that NEPA analysis will be required for every Project funded through the BEAD Program and agrees to provide sufficient information to allow for NEPA analysis such as a detailed Project description, including applicable supporting documentation.
- Certify that their organization acknowledges the significance of minimizing the environmental and historic preservation impacts associated with construction in sensitive areas and will ensure that Projects and eligible activities will be designed to minimize potential adverse impacts on the environment.
- Certify their organization will coordinate with other state offices experienced in administering federal grants and identifying subcontractors for environmental assessments (e.g., U.S. Army Corps of Engineers (USACE), U.S. Forest Service (USFS), and State or Local Historic Preservation Offices).
- Certify that their organization is aware that should further details be needed post-application approval for funding, ACA/NTIA reserves the right to retain funds under a specific award condition until the awardee provides the requisite additional information pertaining to environmental compliance.
- Certify the capability to complete and operate this grant Project, and that the information provided is true and accurate to the best of the Applicant's knowledge.

- Certify that an Arizona licensed Professional Engineer will approve, stamp and certify the final design, diagrams, Project costs estimate, and other technical aspects of the Project and will provide the necessary verification post award.
- Certify that their organization will comply with all federal, state and local laws, including but not limited to laws related to taxation, licensing, labor law, safety and environmental guidelines.
- Certify that the Applicant has read and will adhere both the [ACA Procurement and Grant Compliance policy](#) and the ACA Uniform Terms and Conditions (additional information can be found on ACA website <http://www.azcommerce.com/about-us/aca-policies/>).
- Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment:
  - ✓ All funds made available through the BEAD Program for broadband infrastructure must comply with the prohibition on certain telecommunications and video surveillance services or equipment (2 CFR 200.216). This regulation prohibits federal funds from being used to purchase or install telecommunications and video surveillance equipment, services or systems produced from prohibited companies and/or their subsidiaries. In addition, for public safety installations, there is an extended list of vendors and requirements listed in the National Defense Authorization Act (Public Law No. 115-232, Section 889) which is the source legislation for this condition.
  - ✓ Certify their organization will not procure, obtain, extend or renew a contract to procure or obtain or enter into a contract to procure or obtain equipment, services, or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system. As described in Public Law 115-232, section 889, covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).
  - ✓ Understand that telecommunications or video surveillance services provided by such entities or using such equipment is prohibited.
  - ✓ Understand that for the purposes of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities) is also prohibited.
  - ✓ Understand that telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of the National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise connected to, the government of a covered foreign country is prohibited.
  - ✓ Understand that if any equipment is installed on a federally funded Project, their organization will bear the sole responsibility and cost of removing the prohibited equipment and replacing it with equipment acceptable to the State and Federal government.
- By signing this application, certify to the best of their knowledge and belief that the application is true, complete, and accurate, and the designs, costs and Project plans are for the purposes and objectives set forth in the terms and conditions of the Federal award. Also, they are aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise.

## 7. Appendix A – Required Attachments

Applicants shall include the following documents as attachments. Failure to provide any of these documents may result in an incomplete Project Application. Feel free to include additional attachments that offer relevant information regarding the Applicant's service area, network, business model, and organization to enhance or complete the Applicant's Project Application. Applicant to provide separate attachment for each Project Area included in the Project Application.

Attachment	Purpose
Attachment 1	Project Executive Summary
Attachment 2	Low Earth Orbit Satellite Capacity
Attachment 3	High-Level Network Design
Attachment 4	NEPA Plan
Attachment 5	Project Schedule
Attachment 6	Commitment Letter for LOC
Attachment 7	Surety Letter for Performance Bond
Attachment 8	Project Matching Funds
Attachment 9	Project Financials Workbook
Attachment 10	Certification on Fair Labor and Employment Laws
Attachment 11	Letter of Consent/Collaboration from Local Governments/Tribal Authorities
Attachment 12	Low-Cost Service Plan
Attachment 13	Cybersecurity Risk Management Plan
Attachment 14	Supply Chain Risk Management Plan

## 8. Appendix B: Definitions

- **Applicant:** Those entities who may be interested in applying for BEAD broadband deployment projects in Arizona and are submitting Project Application information.
- **Assistant Secretary:** The term “Assistant Secretary” means the Assistant Secretary of Commerce for Communications and Information or the individual who holds any successor position.
- **Broadband DATA Maps:** The term “Broadband DATA Maps” means the maps created by the Federal Communications Commission under Section 802(c)(1) of the Communications Act of 1934 (47U.S.C. § 642(c)(1)).
- **Broadband; Broadband Service:** The term “broadband” or “broadband service” has the meaning given the term “broadband internet access service” in Section 8.1(b) of title 47, Code of Federal Regulations, or any successor regulation, meaning it is a mass-market retail service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up internet access service. This term also encompasses any service that the Commission finds to be providing a functional equivalent of the service described in the previous sentence or that is used to evade the protections set forth in this part.
- **Commission:** The term “Commission” means the Federal Communications Commission.
- **Community Anchor Institutions (CAIs):** The term “Community Anchor Institutions” refers to a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.
- **Director/Officer Level Employee:** The term “Officer/Director-level employee” of the entity may include roles such as President, Chief Executive Officer, Chief Financial Officer, Treasurer, or equivalent position.
- **Eligible Entity:** The term “Eligible Entity” means any State of the United States, the District of Columbia, Puerto Rico, American Samoa, Guam, the U.S. Virgin Islands, and the Commonwealth of the Northern Mariana Islands or, in the case of an application failure, a political subdivision or consortium of political subdivisions that is serving as a Substitute Entity.
- **Local Government:** Any unit, subdivision, authority, or consortium of local governments such as cities, townships, municipalities, etc.
- **Location; Broadband-Serviceable Location:** The terms “location” and “broadband serviceable location” mean “a business or residential location in the United States at which fixed broadband Internet access service is, or can be, installed.”
- **Priority Broadband Project:** The term “Priority Broadband Project” means a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.
- **Program:** The term “Program” means the Broadband Equity, Access, and Deployment Program.

- **Project Application:** Applicants must submit a project application in accordance with ACA's guidelines and requirements for the BEAD Program. The project application will include details on their infrastructure deployment plan and demonstrate a clear understanding of, and adherence to, all compliance and reporting obligations.
- **Project Area:** ACA will pre-define draft Project Areas for Arizona's BEAD Program deployment projects throughout the state. The pre-defined Project Areas will be made available on the ACA's website for review and comments by the potential Applicants and stakeholders. ACA will further refine and modify pre-defined Project Areas based on feedback received.
- **Project:** The term "Project" means an undertaking by a Subgrantee to construct and deploy infrastructure for the provision of broadband service. A "Project" may constitute a single Unserved or Underserved broadband-serviceable location, or a grouping of broadband-serviceable locations in which not less than 80 percent of broadband-serviceable locations served by the project are Unserved Locations or Underserved Locations.
- **State:** The term "State" means, for the purposes of the BEAD Program, any State of the United States, the District of Columbia, and Puerto Rico. In this case, the State of Arizona.
- **Subgrantee:** The term "subgrantee" means an entity that receives grant funds from an Eligible Entity to carry out eligible activities.
- **Territory:** The term "Territory" means, for the purposes of the BEAD Program, American Samoa, Guam, the United States Virgin Islands, and the Commonwealth of the Northern Mariana Islands.
- **Underserved Location:** The term "Underserved Location" means a broadband-serviceable location that is (a) not an Unserved location, and (b) that the Broadband DATA Maps show as lacking access to Broadband Service offered with—(i) a speed of not less than 100 Mbps for downloads; and (ii) a speed of not less than 20 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.
- **Unserved Location:** 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 Broadband Service offered with—(i) a speed of not less than 25 Mbps for downloads; and (ii) a speed of not less than 3 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.



## 9. Appendix C: BEAD Program Application Scoring Rubric

### Project Application – The Benefit of the Bargain Round:

The Arizona Commerce Authority (ACA) will follow the scoring rubric outlined in the NTIA BEAD Restructuring Policy Notice by prioritizing Project Applications with the lowest cost to the Program. The evaluation process for the Benefit of the Bargain round is structured to ensure compliance with the guidelines specified in the policy to focus on minimizing the cost of deployment under the BEAD Program, and to comply with the ACA's Procurement Guidelines as published on the ACA website.

During the Benefit of the Bargain Round, Applicants will have the opportunity to propose from the following options:

- **Option 1:** Proposing 100% BSLs in the Project Area with a single or a mixed technology solution(s).

Note: The Applicant can choose to propose a 100% Priority Broadband Project or a 100% Non-Priority Broadband Project.

If choosing to propose both Priority BSLs and Non-Priority BSLs, Applicants should include at least 90% of BSLs under the Priority Broadband Project category ensuring they meet future scalability and performance standards, and classify the remaining BSLs as Non-Priority, where scalability standards are not applicable. The ACA will initially review the Priority BSLs and, if necessary, will then evaluate the Non-Priority BSLs.

During evaluation, both the Priority and Non-Priority projects will be individually reviewed and scored.

- **Option 2:** Proposing select BSLs in the Project Area to serve with a single or a mixed technology solution(s) and excluding select BSLs from the Project Area. Applicants should include at least 90% of the Unserved and Underserved BSLs in the Project Area.

For any excluded locations, the ACA will solicit grant applications from other potential Applicants to serve these areas, or an Applicant may propose a multi-provider solution to serve these areas. It is our objective to provide 100% coverage in the BEAD program and will consider minimal program outlay to reach this objective.

For evaluation purposes, the Reference Price (Subsidy Available) for the selected Project Area will be prorated based on the number of proposed BSLs included in the Project Application.

Project Applications providing the most technically feasible and cost-effective solution for affordable broadband deployment through the BEAD Program will be prioritized, as they provide ACA and the state of Arizona with the best value.

The ACA will prioritize Priority Broadband Projects over Non-Priority Broadband Projects for a Project Area. If the ACA determines that selecting a Priority Broadband Project for the same project will add excessive costs to the Program, the ACA will select a lower cost Non-Priority Broadband Project. The ACA will utilize its internal cost-benchmarking analysis and CostQuest Associates (CQA) data to determine what constitutes an excessive cost.

To determine what constitutes an excessive cost for evaluation and prioritization of the Project Applications, the ACA will ensure that BEAD funding is allocated to the Project Areas to maximize coverage with projects that are seeking the capital subsidy amount for a given Project Area within a specific range of grant funding allocated by the ACA.



**Prioritization:** Evaluating the completed Project Applications received, Applications will be reviewed based on the Project Areas and proposed technology type to determine whether a Project Application includes technology capabilities and solutions classified as a Priority Broadband project, or a Non-Priority Broadband project based on the following criteria:

**Priority Broadband Projects:** A “Priority Broadband Project” means a project that provides broadband service with:

- A minimum speed of 100 megabits per second (Mbps) for downloads and 20 Mbps for uploads;
- A latency less than or equal to 100 milliseconds; and
- **Can** easily scale speeds over time to:
  - Meet the evolving connectivity needs of households and businesses (Refer to the ACA’s definition of evolving connectivity under the secondary scoring criteria for Priority Broadband Projects); and
  - Support the deployment of 5G, successor wireless technologies, and other advanced services.

**Non-Priority Broadband Projects:** A “Non-Priority Broadband Project” means a project that provides broadband service:

- A minimum speed of 100 megabits per second (Mbps) for downloads and 20 Mbps for uploads;
- A latency less than or equal to 100 milliseconds; yet
- **Cannot** meet the statutory scalability requirements to easily scale speeds over time:
  - Cannot meet the evolving connectivity needs of households and businesses; and
  - Do not support the deployment of 5G, successor wireless technologies, and other advanced services.

### Deployment Scoring Criteria - Priority Broadband Projects

The ACA will implement the following evaluation criteria and respective scoring weights when assessing Priority Broadband Project Applications submitted by eligible Applicants. These criteria are in accordance with the project scoring guidelines detailed in Section 3.4: Scoring Rubrics of the BEAD Restructuring Policy Notice released on June 6, 2025. Specific evaluation criteria are provided for each scoring category below.

Each Project Application can earn a maximum of 500 points. The evaluation criteria are categorized into primary and secondary segments, with 250 points allocated to the primary category and 250 points to the secondary category applicable for only competing Project Applications. Each of these categories encompasses several elements to be assessed and rated according to the specified considerations within each area.

The details of each scoring category, subcategory, and relative weighting are described below.

### Minimal BEAD Program Outlay Analysis

A minimal BEAD analysis will be conducted to ascertain whether the Subsidy Requested falls within the acceptable range of the Subsidy Available for the proposed BSLs in the Project Area by the ACA. Based on the analysis conducted for each Project Application submitted, the ACA will recommend either preliminarily selecting or entering into negotiations with the Applicant, moving to a Non-Priority Broadband Project Application, if applicable.

- **Reference Price:** The amount of Subsidy Available by the state for all the BEAD eligible locations (Unserved and Underserved BSLs) included in each Project Area

- **Subsidy Available per BSL:** Reference Price / Total number of Unserved and Underserved BSLs in the Project Area
- **Project Cost:** The total overall project cost submitted by the Applicant
- **Project Match:** The Applicant's proposed match
- **Subsidy Requested:** The total BEAD funding that will be required to complete the project by the Applicant.  

$$\text{Subsidy Requested} = \text{Project Cost} - \text{Project Match}$$
- **Subsidy Requested per BSL:** Cost to Program per BSL  

$$\text{Subsidy Requested per BSL} = \text{Subsidy Requested} / \text{Total number of Unserved and Underserved BSLs proposed to be served}$$

### Primary Scoring Criteria - Minimum BEAD Program Outlay

The ACA will prioritize Project Applications with the lowest cost based on minimal BEAD Program outlay. This category covers the Subsidy Requested, considering the Applicant's Project Cost and the Applicant's proposed Project Match. Projects with higher matching funds and lower Subsidy Requested per BSL against the Subsidy Available per BSL will score more points. This Primary Scoring Criteria related to Program costs at a particular Project Area may, if a Proposal is otherwise a Priority Proposal (or a non-Priority Proposal, if no Priority Proposals exist) be determinative in and of itself. If this Primary Scoring is not determinative, then the Scoring Evaluation Criteria outlined below will be utilized by ACA.

Additionally, the ACA may assess the total overall cost to the Program based on the number of the Project Applications submitted by the Applicant post preliminary selection and further negotiations, if applicable.

Based on the combination of the primary and secondary criteria and after the negotiation process, the Applicant with the highest score will move forward with preliminary selection.

#### 1. Assessment of Cost to the Program per Location – 250 Maximum Points

This Evaluation Criteria will score the cost-effectiveness of the selected Project Area by evaluating the Subsidy Requested per BSL against the Subsidy Available per BSL. For evaluation purposes, the Reference Price for the selected Project Area will be pro-rated based on the number of proposed BSLs included in the Project Application.

Each Project Area will be scored separately using a sliding scale system as shown below:

- In the event of a single Project Application for a Project Area, it will be considered for preliminary selection or further negotiations.
- In the event of competing Project Applications for the same Project Area, the ACA may score and prioritize the lowest Subsidy Requested per BSL and other competing Project Applications within 15% of the lowest cost Project Application based on the following criteria:

If the Subsidy Requested per BSL is > 5% of the Subsidy Available per BSL, the ACA may consider negotiations with the Applicant.

Scoring	Priority Project Points
> 15% of the Subsidy Available per BSL	0
> 5% to ≤ 15% of the Subsidy Available per BSL	150

> 0% to ≤ 5% of the Subsidy Available per BSL	175
> -10% to ≤ 0% of the Subsidy Available per BSL	200
> -15% to ≤ -10% of the Subsidy Available per BSL	225
≤ - 15% of the Subsidy Available per BSL	250

## 2. Assessment of the Total Overall Lowest Cost to the Program

Additionally, the ACA will evaluate the combination of Project Applications with the lowest overall cost to the Program against the Subsidy Available for the selected Unserved and Underserved BSLs for the Project Areas. This may involve selecting a proposal that is not the lowest-cost option for a given set of BSLs but is part of the combination of selected projects with the lowest overall cost to the Program, wherever applicable.

In the case of multiple Project Applications for the same Project Area, if there are one or more competing Project Applications within 15% of the lowest Subsidy Requested per BSL proposal, the ACA will score and prioritize applications with the following secondary criteria:

### Secondary Scoring Criteria

#### 1. Pledged Speed to Deployment for Priority Broadband Projects – 50 Maximum Points

All recipients of the BEAD Program funds designated for network deployment are required to use technologies that exhibit greater ease of scalability and execute the planned broadband network and commence delivering services to all subscribers seeking broadband services within the Project Area no later than four years after the subgrantee receives the award from the ACA. The ACA will assess Project Applications based on their pledged speed of deployment using a sliding scale system as shown below.

Deployment Schedule	Priority Project Points
< 24 months	50
24 - 36 months	40
36 - 42 months	30
42 – 47 months	20
48 months	0

#### 2. Speed of Network and Other Capabilities for Priority Broadband Projects – 150 Maximum Points

Two elements will be evaluated as part of this category. For Project Applications suggesting the adoption of technologies that offer enhanced scalability with reduced future expenditure for Priority Broadband Projects, the ACA will evaluate long-lasting capital assets using a sliding scale system under the following categories:

- The Speed of Network and Latency - Maximum of 75 points

Speed of Network and Latency	Priority Project Points
------------------------------	-------------------------

≤ 10 Gbps download and 2.5 Gbps upload or greater, maximum latency of 100ms	75
≤ 1 Gbps download and upload, maximum latency of 100ms	50
≤ 1 Gbps download and 250 Mbps upload, maximum latency of 100ms	25
≤ 250 Mbps download and 100 Mbps upload, maximum latency of 100ms	10
< 100 Mbps download and 20 Mbps upload, maximum latency of 100ms	0

• **Other Technical Capabilities - Evolving Connectivity Capabilities – Maximum 75 points**

The proposed technological solution will be evaluated on the ability to meet the evolving connectivity needs as defined by ACA by the following:

Applicants will be evaluated based on the supported per subscriber downstream and upstream usage (in Mbps) at 100% take rate at 100% by the end of the period of performance, without any additional costs for network upgrades provided in the application.

**Calculation Assumptions:** To be technology independent in evaluating the evolving connectivity needs offering, the Applicant shall assume:

- A **shared port** is defined as the shared resource (such as a PON port, a DOCSIS service group, etc.) common across multiple subscribers.
- **100% take rate** of the subscribers connected to a shared port
  - For example, if the subscriber assumes 1:64 split, 100% take rate implies that 64 subscribers are connected. If 256 subscribers are assumed in a DOCSIS service group, then 256 subscribers are connected.
- **100% concurrent usage** of the subscribers on a shared port during the peak time
  - That is, all the subscribers on a shared port (for example, 64 active subscribers in 1:64 split PON configuration) are active at the same time.
- 2026 starting simultaneous **downstream usage** per subscriber is **5 Mbps**
- 2026 starting simultaneous **upstream usage** per subscriber is **1 Mbps**

**Other Technical Capabilities - The minimum simultaneous support usage per subscriber** will be scored against a sliding scale for a maximum of 75 points. The Applicant must score at least 15 points under this category to be considered under the priority broadband projects category evaluations. If the minimum simultaneous supported usage per subscriber is:

Minimum simultaneous supported usage	Priority Project Points
≥ 100 Mbps downstream and ≥ 10 Mbps upstream	75
≥ 80 but < 100 Mbps downstream and ≥ 8 but < 10 Mbps upstream	60
≥ 40 but < 80 Mbps downstream and ≥ 4 but < 8 Mbps upstream	45
≥ 20 but < 40 Mbps downstream and ≥ 2 and < 4 Mbps upstream	30

≥ 5 Mbps < 20 Mbps downstream and ≥ 1 but < 2 Mbps upstream	15
< 5 Mbps downstream and 1 Mbps upstream	0

### 3. Preliminary/Provisionally Selected Subgrantees – 50 Maximum Points

For the BSLs, where the ACA has already identified preliminary or provisionally selected subgrantees during Round 1, the ACA will give additional weight to those Project Applications in the Benefit of the Bargain Round by providing 50 additional points.

Scoring Criteria	Priority Project Points
Preliminary/Provisionally Selected Subgrantees during Round 1	50
Other Applicants	0

### Deployment Scoring Criteria – Non-Priority Broadband Projects

The scoring rubric for the Non-Priority Broadband projects will be conducted with the following criteria:

#### Primary Scoring Criteria – Minimum BEAD Program Outlay

The ACA will prioritize Project Applications with the lowest cost based on minimal BEAD Program outlay. This category covers the Subsidy Requested, considering the Applicant's total Project Cost and the Applicant's proposed Project Match. Projects with higher matching funds and lower Subsidy Requested per BSL against the Subsidy Available per BSL will score more points.

Additionally, the ACA may assess the total overall cost to the Program based on the number of the Project Applications submitted by the Applicant post preliminary selection and further negotiations, if applicable.

Based on the combination of the primary and secondary criteria, the Applicant with the highest score and after the negotiation process, the Applicant with the highest score will be selected for a preliminary award.

#### 1. Assessment of Cost to the Program per Location – 250 Maximum Points

This criterion will evaluate the cost-effectiveness of the selected Project Area by evaluating the Subsidy Requested per BSL against the Subsidy Available per BSL. For evaluation purposes, the Reference Price for the selected Project Area will be pro-rated based on the number of proposed BSLs included in the Project Application. Each Project Area will be scored separately using a sliding scale system as shown below:

- In the event of a single Project Application to a Project Area, it will be considered for preliminary award or further negotiations.
- In the event of competing Project Applications for the same Project Area, the ACA may score and prioritize the lowest cost Project Application with the lowest Subsidy Requested per BSL and other competing Project Applications within 15% of the lowest cost Project Application based on the following criteria:

If the Subsidy Requested per BSL is > 5% of the Subsidy Available per BSL, the ACA may consider negotiations with the Applicant.

Scoring	Non-Priority Project Points
> 15% of the Subsidy Available per BSL	0
> 5% to ≤ 15% of the Subsidy Available per BSL	150
> 0% to ≤ 5% of the Subsidy Available per BSL	175
> -10% to ≤ 0% of the Subsidy Available per BSL	200
> -15% to ≤ -10% of the Subsidy Available per BSL	225
≤ - 15% of the Subsidy Available per BSL	250

## 2. Assessment of the Total Overall Lowest Cost to the Program

Additionally, the ACA will evaluate the combination of Project Applications with the lowest overall cost to the Program against the Subsidy Available for the selected Unserved and Underserved BSLs for the Project Areas. This may involve selecting a proposal that is not the lowest-cost option for a given set of BSLs but is part of the combination of selected projects with the lowest overall cost to the Program, wherever applicable

In the case of multiple Project Applications for the same Project Area, if there are one or more competing Project Applications within 15% of the lowest Subsidy Requested per BSL proposal, the ACA will score and prioritize applications with the following secondary criteria:

### Secondary Scoring Criteria

#### 1. Speed to Deployment for Non-Priority Broadband Projects – 50 Maximum Points

All recipients of the BEAD Program funds designated for network deployment are required to use technologies that exhibit greater ease of scalability and execute the planned broadband network and commence delivering services to all subscribers seeking broadband services within the Project Area no later than four years after the subgrantee receives the award from the ACA. The ACA will assess Project Applications based on their pledged speed of deployment using a sliding scale system as shown below.

Deployment Schedule	Non-Priority Project Points
< 24 months	50
24 - 36 months	40
36 - 42 months	30
42 – 47 months	20
48 months	0

#### 2. Speed of Network and Other Capabilities for Priority Broadband Projects – 150 Maximum Points

For Non-Priority Broadband Projects, the Speed of Network and Latency capabilities will be evaluated with the following sliding scale system:

Speed of Network and Latency	Non-Priority Project Points
≤ 10 Gbps download and 2.5 Gbps upload or greater, maximum latency of 100ms	150
≤ 1 Gbps download and upload, maximum latency of 100ms	100
≤ 1 Gbps download and 250 Mbps upload, maximum latency of 100ms	75
≤ 250 Mbps download and 100 Mbps upload, maximum latency of 100ms	50
< 100 Mbps download and 20 Mbps upload, maximum latency of 100ms	0

### 3. Preliminary/Provisionally Selected Subgrantees – 50 Maximum Points

For the BSLs, where the ACA has already identified preliminary or provisionally selected subgrantees during Round 1, the ACA will give additional weightage to those Project Applications in the Benefit of the Bargain Round by providing 50 additional points.

Scoring Criteria	Non- Priority Project Points
Preliminary/Provisionally Selected Subgrantees during Round 1	50
Other Applicants	0

## 10. Appendix D: Resources

1. Arizona I Broadband Equity, Access & Deployment Program: <https://www.azcommerce.com/broadband/arizona-broadband-equity-access-deployment-program/>
2. Arizona I BEAD Five-Year Action Plan: [https://www.azcommerce.com/media/gfoj3qxx/arizona-bead-five-year-action-plan\\_final\\_08222023.pdf](https://www.azcommerce.com/media/gfoj3qxx/arizona-bead-five-year-action-plan_final_08222023.pdf)
3. Arizona I BEAD Initial Proposal, Volume I: [aca-bead-initial-proposal\\_volume-i-final-revision.pdf](https://www.azcommerce.com/media/owtphdsj/aca-bead-initial-proposal_volume-i-final-revision.pdf)
4. Arizona I BEAD Initial Proposal, Volume II: [https://www.azcommerce.com/media/owtphdsj/az\\_bead-initial-proposal-vol-ii\\_final\\_05\\_24\\_2024v6\\_ntia.pdf](https://www.azcommerce.com/media/owtphdsj/az_bead-initial-proposal-vol-ii_final_05_24_2024v6_ntia.pdf)
5. Arizona I BEAD Initial Proposal Volume II - Change Summary: <https://www.azcommerce.com/media/bmdarvhj/aca-bead-initial-proposal-vol-ii-changes-summary.pdf>
6. Arizona I BEAD Challenge Process: <https://www.azcommerce.com/broadband/arizona-broadband-equity-access-deployment-program/the-challenge-process/>
7. Arizona I BEAD Market Sounding: <https://www.azcommerce.com/broadband/arizona-broadband-equity-access-deployment-program/market-sounding/>
8. Arizona I BEAD Market Sounding FAQs: <https://www.azcommerce.com/media/kyuohnuq/market-sounding-faqs.pdf>
9. Arizona I BEAD Upcoming Webinars: <https://www.azcommerce.com/broadband/arizona-broadband-equity-access-deployment-program/upcoming-webinars/>
10. NTIA I Broadband Equity Access and Deployment Program: <https://broadbandusa.ntia.doc.gov/funding-programs/broadband-equity-access-and-deployment-bead-program>
11. NTIA I Broadband Equity Access and Deployment Program Overview: <https://www.internetforall.gov/sites/default/files/2022-05/BEAD%20Info%20Sheet%20%20IFA%20Launch%20-%20Final.pdf>
12. NTIA I BEAD Notice of opportunity Funding (NOFO): <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf>
13. NTIA I BEAD State Broadband Office Resource Index: [https://broadbandusa.ntia.doc.gov/technical-assistance/BEAD\\_Resource\\_Index](https://broadbandusa.ntia.doc.gov/technical-assistance/BEAD_Resource_Index)
14. NTIA I BEAD FAQs: [https://broadbandusa.ntia.doc.gov/technical-assistance/BEAD\\_FAQs](https://broadbandusa.ntia.doc.gov/technical-assistance/BEAD_FAQs)
15. NTIA I BEAD Initial Proposal Funding Request Guidance: [https://broadbandusa.ntia.doc.gov/sites/default/files/2023-12/IPFR\\_Eligible\\_Entity\\_Guidance\\_12-07-2023.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2023-12/IPFR_Eligible_Entity_Guidance_12-07-2023.pdf)
16. NTIA I BEAD Initial Proposal Guidance Volume I and Volume II: [https://broadbandusa.ntia.doc.gov/sites/default/files/202310/BEAD\\_Initial\\_Proposal\\_Guidance\\_Volumes\\_I\\_II\\_10-2023.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/202310/BEAD_Initial_Proposal_Guidance_Volumes_I_II_10-2023.pdf)
17. NTIA I BEAD Challenge Process Data Submission - Data Quality, File Formats, and Common Issues: [https://broadbandusa.ntia.doc.gov/technical-assistance/BEAD\\_Challenge\\_Process\\_Data\\_Submission](https://broadbandusa.ntia.doc.gov/technical-assistance/BEAD_Challenge_Process_Data_Submission)



18. NTIA I BEAD Model Challenge Process: <https://www.ntia.gov/sites/default/files/2023-09/bead-model-challenge-process.zip>
19. NTIA I Smart Start - How to Plan and Prepare for National Environmental Policy Act (NEPA) Compliance for BEAD: [https://broadbandusa.ntia.doc.gov/technicalassistance/Smart\\_Start\\_NEPA\\_Compliance\\_for\\_BEAD](https://broadbandusa.ntia.doc.gov/technicalassistance/Smart_Start_NEPA_Compliance_for_BEAD)
20. NTIA I NEPA FAQs for BEAD Addendum: [https://broadbandusa.ntia.doc.gov/technicalassistance/FAQ\\_NEPA\\_for\\_BEAD](https://broadbandusa.ntia.doc.gov/technicalassistance/FAQ_NEPA_for_BEAD)
21. NTIA I NEPA for BEAD: Evaluating FirstNet PEIS Statement Sections for States/Territories: [https://broadbandusa.ntia.doc.gov/technicalassistance/DOC\\_NTIA\\_BEAD\\_Evaluating\\_FirstNet\\_PEIS](https://broadbandusa.ntia.doc.gov/technicalassistance/DOC_NTIA_BEAD_Evaluating_FirstNet_PEIS)
22. NTIA I Guidance on NTIA National Environmental Policy Act Compliance: [https://broadbandusa.ntia.doc.gov/technicalassistance/Guidance\\_on\\_NTIA\\_NEPA\\_Compliance\\_April\\_2024](https://broadbandusa.ntia.doc.gov/technicalassistance/Guidance_on_NTIA_NEPA_Compliance_April_2024)
23. NTIA I Environmental & Historical Preservation Fact Sheet: [https://broadbandusa.ntia.doc.gov/sites/default/files/2022-12/EHP\\_Fact\\_Sheet\\_2022.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2022-12/EHP_Fact_Sheet_2022.pdf)
24. NTIA I NHPA Section 106 Consultation Process Fact Sheet: [https://broadbandusa.ntia.doc.gov/sites/default/files/202212/NHPA\\_Sect\\_106\\_Consultation\\_Process\\_Fact\\_Sheet.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/202212/NHPA_Sect_106_Consultation_Process_Fact_Sheet.pdf)
25. NTIA I Endangered Species Act (ESA) Section 7 Consultations Fact Sheet: [https://broadbandusa.ntia.doc.gov/technicalassistance/Endangered\\_Species\\_Act\\_Section\\_7\\_Consultations\\_Fact\\_Sheet](https://broadbandusa.ntia.doc.gov/technicalassistance/Endangered_Species_Act_Section_7_Consultations_Fact_Sheet)
26. NTIA I Environmental & Historical Preservation Fact Sheet: [https://broadbandusa.ntia.doc.gov/technical-assistance/EHP\\_Fact\\_Sheet\\_2022](https://broadbandusa.ntia.doc.gov/technical-assistance/EHP_Fact_Sheet_2022)
27. NTIA I BEAD Permitting: [https://broadbandusa.ntia.doc.gov/technical-assistance/What\\_is\\_Permitting](https://broadbandusa.ntia.doc.gov/technical-assistance/What_is_Permitting)
28. NTIA I Local Permitting Importance, Challenges, and Strategies: [https://broadbandusa.ntia.doc.gov/technicalassistance/Local\\_Permitting\\_Importance\\_Challenges\\_and\\_Strategies](https://broadbandusa.ntia.doc.gov/technicalassistance/Local_Permitting_Importance_Challenges_and_Strategies)
29. NTIA I Best Management Practices (BMP) and Mitigation Measures: [https://broadbandusa.ntia.doc.gov/technical-assistance/BMP\\_and\\_Mitigation\\_Measures](https://broadbandusa.ntia.doc.gov/technical-assistance/BMP_and_Mitigation_Measures)
30. NTIA I Examples and Best Practices of Streamlining Permitting: [https://broadbandusa.ntia.doc.gov/technical-assistance/Permitting\\_Best\\_Practices\\_Case\\_Studies](https://broadbandusa.ntia.doc.gov/technical-assistance/Permitting_Best_Practices_Case_Studies)
31. NTIA I Permitting Needs Assessment: [https://broadbandusa.ntia.doc.gov/technicalassistance/Permitting\\_Needs\\_Assessment](https://broadbandusa.ntia.doc.gov/technicalassistance/Permitting_Needs_Assessment)
32. NTIA I Environmental & Historical Preservation and Climate Resiliency Preparation Checklist: [https://broadbandusa.ntia.doc.gov/technical-assistance/EHP\\_Preparation\\_Checklist\\_2022](https://broadbandusa.ntia.doc.gov/technical-assistance/EHP_Preparation_Checklist_2022)
33. NTIA I NEPA Review: Environmental Assessments: [https://broadbandusa.ntia.doc.gov/technical-assistance/NEPA\\_Review\\_Environmental\\_Assessments](https://broadbandusa.ntia.doc.gov/technical-assistance/NEPA_Review_Environmental_Assessments)
34. NTIA I BEAD Match Primer: [https://broadbandusa.ntia.gov/technical-assistance/BEAD\\_Match\\_Primer](https://broadbandusa.ntia.gov/technical-assistance/BEAD_Match_Primer)

## 11. Appendix E: Sample Letter of Credit

### Sample Letter of Credit from Bank or Credit Union

#### IRREVOCABLE STANDBY LETTER OF CREDIT

No. 123

*To be placed on Bank Letterhead*

*\*Fixed End Date Version*

[Name of Issuing Bank or Credit Union]

[Address of Issuing Bank or Credit Union]

Date of Issuance: \_\_\_\_\_

Amount: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

#### BENEFICIARY

State of \_\_\_\_\_

*[State Broadband Office]*

Address Line 1

Address Line 2

#### LETTER OF CREDIT PROVIDER

*[Formal Name of Winning Bidder/Applicant]*

Address Line 1

Address Line 2

Dear Sir/Madam:

We hereby establish, at the request and for the account of *[Winning Bidder/Applicant]*, in your favor, as required under the Broadband Equity, Access, and Deployment Program Notice of Funding Opportunity at 72, § IV.D.2.a.ii (BEAD NOFO) issued by the National Telecommunications and Information Administration ("NTIA"), and the State of \_\_\_\_\_'s Initial Proposal Volume 2 approved by the NTIA, our Irrevocable Standby Letter of Credit No. \_\_\_\_\_ in the amount of *[State amount of Letter of Credit in words and figures]*.

Funds under this Letter of Credit are available to you against your draft in the form attached hereto as Annex A, drawn on our office described below, and referring to the number of this Letter of Credit, accompanied by your written and competed certificate signed by you substantially in the form of Annex B, attached hereto. Such draft and certificates shall be dated the date of presentation or an earlier date, which presentation shall be made at our office located at *[Issuing Bank Address]* and shall be effected either by personal delivery or delivery by a nationally recognized overnight delivery service. We hereby commit and agree to accept such presentation at such office, and if such presentation of documents appears on its face to comply with the terms and conditions of this Letter of Credit, on or prior to the terms and

conditions of this Letter of Credit, on or prior to the Expiration Date, we will honor the same not later than one (1) banking day after presentation thereof in accordance with your payment instructions. Payment under this Letter of Credit shall be made by *[check or wire transfer of funds]* to the payee and for the account you designate, in accordance with the instructions set forth in a draft presented in connection with a draw under this Letter of Credit.

Partial drawings are not permitted under this Letter of Credit. This Letter of Credit is not transferable or assignable in whole or in part.

This Letter of Credit shall automatically renew for one (1) year periods from the then current Expiration Date unless *[Issuing Bank]* gives written notice of non-renewal to *[State Broadband Office]* by a nationally recognized overnight delivery service with a copy to the *[State Broadband Office]* at *[Address]*, at least sixty (60) days but not more than ninety (90) days prior to the expiry thereof, or such earlier date as the Letter of Credit is terminated (the "Expiration Date"). Capitalized terms used herein but not defined herein shall have the meanings accorded such terms in the Order.

This Letter of Credit shall be canceled and terminated upon receipt by the undersigned of *[State Broadband Office]* certificate purportedly signed by two (2) authorized representatives of *[State Broadband Office]* in the form attached as Annex C.

This Letter of Credit sets forth in full the undertaking of the Issuer, and such undertaking shall not in any way be modified, amended, amplified or limited by reference to any document, instrument or agreement referred to herein, except only the certificates and the drafts referred to herein and the Internet Service Provider (ISP) (as defined below); and any such reference shall not be deemed to incorporate herein by reference any document, instrument or agreement except for such certificates and such drafts and the ISP.

This Letter of Credit shall be subject to, governed by, and construed in accordance with, the International Standby Practices 1998, International Chamber of Commerce Publication No. 590 (the "ISP"), which is incorporated into the text of this Letter of Credit by this reference, and, to the extent not inconsistent therewith, the laws of the *[State]* including the Uniform Commercial Code as in effect in the State of \_\_\_\_\_.

If this Letter of Credit is issued by a United States Credit Union, the Credit Union must be insured by the [National Credit Union Administration](#); and (b) have a credit union safety rating issued by [Weiss Ratings](#) of B- or better to in order to provide a Letter of Credit.

Communications with respect to this Letter of Credit shall be addressed to us at our address set forth below, specifically referring to the number of this Letter of Credit.

Signature  
*[Name of Signatory / Title of Signatory]*

*[Name of Bank or Credit Union]*  
Signature of Authorized Agent

**ANNEX A**  
**Form of Draft**

To: *[Bank or Credit Union]*  
DRAWN ON LETTER OF CREDIT No: 123

AT SIGHT,

PAY TO THE ORDER OF THE *[State Broadband Office]* BY *[CHECK OR WIRE TRANSFER]*  
FUNDS TO:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Account (\_\_\_\_\_)   
AS *[State]* BEAD PROGRAM REPAYMENT.

*[AMOUNT IN WORDS]* DOLLARS AND NO/CENTS  
\$*[AMOUNT IN NUMBERS]*

*[State Broadband Office]*

By: \_\_\_\_\_  
*[State Broadband Office], Director*

**ANNEX B**

**Draw Certificate**

The undersigned hereby certifies to [*Name of Issuing Bank/Credit Union*] (the “Bank”), with reference to (a) Irrevocable Standby Letter of Credit No. 123 (the “Letter of Credit”) issued by the Bank in favor of [*State Broadband Office*] and (b) the Broadband Equity, Access, and Deployment (BEAD) Program’s Notice of Funding Opportunity at 72, § IV.D.2.a.ii, (BEAD NOFO), issued by the National Telecommunications and Information Administration on May 12, 2022, and the State of \_\_\_\_\_’s Initial Proposal Volume 2, approved by the NTIA (the “BEAD Program Requirements”), pursuant to which *Name of Selected Subawardee* (the “Provider”) has provided the Letter of Credit (all capitalized terms used herein but not defined herein having the meaning stated in the BEAD Program Requirements), that:

The [*Name of Selected Subawardee*] has [describe the event that triggers the draw], which is evidenced by a letter signed by the Director of the [*State Broadband Office*] or [his/her] designee, dated \_\_\_\_\_, 20\_\_\_\_, a true and correct copy of which is attached hereto. Accordingly, a draw of the entire amount of the *Letter of Credit No. 123* is authorized.

OR

The [*State Broadband Office*] certifies that given notice of non-renewal of Letter of Credit No. 123 and failure of the account party to obtain a satisfactory replacement thereof, pursuant to the BEAD Program Requirements, [*State Broadband Office*] is entitled to receive payment of \$\_\_\_\_\_, representing the entire amount of Letter of Credit No. 123.

IN WITNESS WHEREOF, the undersigned has executed this certificate as of [specify time of day] on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

[*State Broadband Office*]

By: \_\_\_\_\_  
[*State Broadband Office*], Director

**ANNEX C**

**Certificate Regarding Termination of Letter of Credit**

The undersigned hereby certifies to *[Name of Bank or Credit Union]* (the “Bank”), with reference to (a) Irrevocable Standby Letter of Credit No. 123 (the “Letter of Credit”) issued by the Bank in favor of *[State Broadband Office]*, and (b) the requirements set forth in the Broadband Equity, Access, and Deployment (BEAD) Program’s Notice of Funding Opportunity, issued by the National Telecommunications and Information Administration on May 12, 2022 (the “BEAD Program Requirements”) and the State of \_\_\_\_’s Initial Proposal Volume 2, approved by the NTIA (all capitalized terms used herein but not defined herein having the meaning stated or described in the BEAD Program Requirements), that:

(1) [include one of the following clauses, as applicable]

(a) The BEAD Program Requirements have been fulfilled in accordance with the provisions thereof; or

(b) *[Provider/Selected Subawardee]* has provided a replacement letter of credit satisfactory to the *[State Broadband Office]*.

(2) By reason of the event or circumstance described in paragraph (1) of this certificate and effective upon receipt by the Bank of this certificate (countersigned as set forth below), the Letter of Credit is terminated.

IN WITNESS WHEREOF, the undersigned has executed this certificate as of the \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

*[State Broadband Office]*

By: \_\_\_\_\_  
*[State Broadband Office]*, Director

By: \_\_\_\_\_  
Name:  
Title:

## 12. Appendix F: Sample Surety Letter for Performance Bond

### Sample Letter Programmatic Waiver of Letter of Credit Commitment to Issue Performance Bond

Date of Issuance: \_\_\_\_\_

Amount of Bond: \_\_\_\_\_

OBLIGEE/BENEFICIARY

State of \_\_\_\_\_

[*State Broadband Office*]

Address Line 1

Address Line 2

GUARANTOR/SURETY COMPANY

Address Line 1

Address Line 2

Dear Sir/Madam:

We hereby establish, at the request and for the account of [Subgrantee/Principal], in your favor, as required under the Broadband Equity, Access, and Deployment Notice of Funding Opportunity at 72, § IV.D.2.a.ii (BEAD NOFO), the Programmatic Waiver regarding BEAD Letter of Credit Requirement (Oct. 23, 2023), issued by the National Telecommunications and Information Administration ("NTIA"), and as required by the State of \_\_\_\_\_'s Initial Proposal, Vol. 2, our commitment to issue a Performance Bond in the sum of *[State amount of Bond in words and figures]*, on behalf of *[Subgrantee/Principal]* which sum represents 100% of the award sum.

The undersigned certifies that it possesses a *[State]* Certificate of Authority as an acceptable surety on federal bonds as identified in the Department of Treasury Circular 570, 2023 Revision) and, if an award is made, hereby commits to issue a Performance Bond in the requisite amount for *[Subgrantee/Contractor/Principal]* for 100% of the award amount, naming the *[State Broadband Office]* as the Obligee. It is understood and agreed that a Performance Bond must be secured prior to the *[Subgrantee/Principal]* entering into any award agreement with *[State Broadband Office]*.

The undersigned further acknowledges the Performance Bond requirements may be modified under certain permissible events, such as where *[State Broadband Office]* issues funding on a reimbursable basis and the Subgrantee/Principal meets deployment milestones or, where *[State Broadband Office]* issues funding on a reimbursable basis consistent with the BEAD NOFO (Section IV.C.1.b) and reimbursement is for periods of no more than six months each.

The Performance Bond requirements will be presumed to be set at 100% of the subaward amount but may be modified in accordance with the terms and conditions set forth in the *[State]* Initial Proposal, Vol. 2, and at the discretion of *[State Broadband Office]*.

Sincerely,

*[Guarantor/Surety Company]*

Name: \_\_\_\_\_

Title: \_\_\_\_\_