



June 20, 2025

Subject: Submission of Supporting Evidence for BEAD Funding Exemption

Dear ULFW Provider,

Thank you for notifying the Arizona Commerce Authority of your intent to submit supporting evidence indicating that BEAD funding is unnecessary for the locations you serve in accordance with the recent federal amendments to the BEAD program outlined in the [BEAD Restructuring Policy Notice](#) dated June 6, 2025.

This message is a reminder that you have seven calendar days from the date of this notice (June 20, 2025) to provide the required documentation supporting your claim that your existing ULFW services meet the technical and service standards necessary for a BEAD subgrant.

The Arizona Commerce Authority requires that the ULFW provider submit the following supporting documentation to proceed with your claim that BEAD funding is unnecessary for the locations your services cover:

## 1. Locations and Capabilities

- Provide a detailed list of BEAD-eligible locations supported per tower, with a focus on the following needs:
  - Basic Requirements:
    - ✓ Minimum 100 Mbps down and 20 Mbps up during peak times.
    - ✓ 100 msec of latency.
    - ✓ Evidence showing these speeds are maintained during peak times.
- File name: providerid\_rc5.csv
- Fields:

Field Name	Field Description
location_id	FCC location_id

## 2. Frequency Spectrum Usage Per Tower

- Provide the frequency spectrum(s) utilized per tower.
- Describe the capacity offered per sector under various interference conditions:
  - Line of Sight (LOS)
  - Non-LOS
  - Different inclement weather conditions
- Detail different equipment configurations, such as signal strength and additional reserved capacity to meet the committed speeds and latency requirements:
  - During interference conditions
  - During non-interference conditions

- Provide this analysis in a standard polygon GIS format that represents the propagation model / coverage of each Tower
- File name: providerid\_towers.geojson / providerid\_towers.kmz
- Fields:

Field Name	Field Description
ID	Unique tower identifier
technology	FCC technology code
propagation_model	Specifies the NTIA approved propagation model used
frequency	Frequency spectrum utilized
clutter_category	FCC category description for clutter
other*	*include other fields that meet the requirements as listed above

### 3. Interference Mitigation

- Provide evidence of how interference mitigation is executed to maintain the committed speeds.
- File name: providerid\_mitigation.pdf

For additional information, please refer to Appendix A of the Restructuring BEAD Policy Notice for specifics on these standards. Successfully demonstrating compliance will render the served locations ineligible for BEAD program funding.

For detailed instructions on submitting your supporting documentation, please consult Exhibit A.

Ensure that all supporting documentation is submitted to Arizona Broadband Navigator portal by 5:00 pm MST on Friday, June 27, 2025.

Thank you for your cooperation and timely action.

Best regards,

State Broadband Office  
Arizona Commerce Authority  
[broadband@azcommerce.com](mailto:broadband@azcommerce.com)