

Broadband Equity, Access, and Deployment Program (BEAD)

Approved Final Proposal

Arizona Commerce Authority (ACA)

December 2025

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Overview

The Arizona Commerce Authority (ACA) has prepared the following draft version of the Final Proposal for consideration by the National Telecommunications and Information Association (NTIA), in compliance with the Broadband Equity, Access, and Deployment (BEAD) Program Notice of Funding Opportunity (NOFO) and the BEAD Restructuring Policy Notice (RPN) for public comments.

Arizona BEAD Program Subgrantee Selection Results

In line with the NTIA's Final Proposal Guidance issued in June 2025, this document outlines Arizona's process for selecting subgrantees, making location determinations, and ensuring compliance with NTIA standards.

ACA conducted a competitive subgrantee selection process for BEAD deployment funding, incorporating a Benefit of the Bargain Round to optimize cost efficiency as per the BEAD RPN guidelines. After reviewing applications, ACA has provisionally selected 10 subgrantees to serve 160,404 BSLs. The subgrantees have committed a project match of \$519,178,371 with ACA supplementing the efforts with a total subsidy of \$446,972,359. The average deployment cost for the program is \$2,781. Below is the coverage distribution:

- **Fiber:** 73% coverage
- **Fixed Wireless:** 21% coverage
- **LEO (Low Earth Orbit satellite):** 6% coverage

Public Comment

ACA invited public commentary on this draft Final Proposal from August 27 to September 3, 2025, for review and consideration. <https://www.azcommerce.com/broadband/initiatives/bead/>.

0 Final Proposal Data Submission

0.1 Supporting Documentation for Subgrantees

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

See Exhibit 1.

0.2 Supporting Documentation for Deployment Projects

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

See Exhibit 2.

0.3 Supporting Documentation for Locations

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

See Exhibit 3.

0.4 Supporting Documentation for No BEAD Locations

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

See Exhibit 4.

0.5 Certification to Serve CAIs

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

Yes.

0.6 Supporting Documentation for CAIs

Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named “fp_cai.csv”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity’s Challenge Process results.

See Exhibit 5.

1 Subgrantee Selection Process Outcomes (Requirement 1)

1.1 Subgrantee Selection Process Consistency with Initial Proposal Volume II

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

Arizona Commerce Authority's (ACA) subgrantee selection process followed the process outlined in the state's approved Initial Proposal Vol II and modified as necessary to comply with the [BEAD Restructuring Policy Notice](#).

On July 8th, 2025, ACA published the ACA's BEAD Program Benefit of the Bargain Round (BOTB) Project Application Guidance and held webinars to provide guidance for prospective subgrantees on the revised eligibility requirements, the elimination of certain regulatory and non-statutory requirements, revised project areas, and evaluation criteria for the Benefit of the Bargain Round.

Communication of the rescinded preliminary subaward selections during Round 1 was made prior to the BOTB round application submission window. After receiving approval for the Initial Proposal Revision Letter, ACA conducted its Benefit of the Bargain Round subgrantee selection process for all BEAD-eligible locations from July 8, 2025, through July 22, 2025.

ACA developed a comprehensive and transparent subgrantee selection process aimed at selecting the most technically qualified and cost-effective applications for broadband infrastructure deployment across Arizona. Applicants with approved Pre-Registration applications as part of the Arizona BEAD Round 1 were automatically considered as Registered for the BOTB round. New applicants were required to complete their Registration for the Benefit of the Bargain Round for ACA to assess the organization's financial, technical, managerial, operational, and other capabilities. Registration was designed to ensure that the Applicants met the BEAD program's minimum and mandatory requirements. The information collected during Registration was applied to all applications submitted by the prospective subgrantee.

After the application window closed, applications were reviewed in line with the evaluation and scoring outlined in the ACA' BEAD Program Benefit of the Bargain Round Project Application Guidance, the Restructuring Policy Notice and NTIA BEAD Requirements from July 23 ,2025 to August 4, 2025. All applications were then assessed utilizing the updated scoring rubric as defined by the BEAD Restructuring Policy Notice further described in Section 13.1 of this final proposal document.

The negotiation phase occurred from August 05, 2025 through August 22, 2025 after the Benefit of the Bargain Round concluded. If ACA determined that selecting a Priority Broadband Project for the same area involved excessive costs, it chose a lower-cost non-Priority Broadband Project.

ACA used its internal cost-based analysis (leveraging historical state and federal grant applications data), alongside CostQuest Associates (CQA) data and information provided by applicants, to assess what constituted an excessive cost and were evaluated accordingly.

1.2 Fair, Open, and Competitive Process

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

ACA has developed a comprehensive and transparent subgrantee selection process aimed at selecting the most qualified applicants for broadband infrastructure deployment in Arizona. The approach outlined in this section was designed to achieve a fair, open, and competitive process for the selection of subgrantees for the deployment program.

The ACA subgrantee selection process included multiple approaches and methods to ensure a fair, transparent, and competitive process. The ACA subgrantee selection process allowed a broad range of both in-state and out-of-state qualified providers of various technology types to participate and submit applications. ACA complied with all applicable Arizona-specific regulations, the process outlined in the approved Initial Proposal Volume II, and modifications as necessary to conform with the requirements of the BEAD Restructuring Policy Notice.

Steps Taken to Ensure a Fair Process: ACA implemented key measures to ensure a fair subgrantee selection process. These key measures included the following:

- **Transparent Scoring Criteria:** ACA released the scoring criteria in the Benefit of the Bargain Round Project Application Guidance document to allow prospective subgrantees to have access to the scoring rubric prior to conducting the Benefit of the Bargain Round subgrantee selection process.
- **Reviewer Qualifications and Training:** Comprehensive training was provided for all reviewers to ensure the importance of objectivity, the criteria for evaluation, and the ethical guidelines governing the process. Reviewers were trained on how to document findings using a standardized process and tools. Only those with relevant expertise and no conflicts of interest were chosen to ensure a fair and unbiased review process.
- **Multi-level Review:** All submitted applications underwent a multi-level review process, where each application was evaluated by at least two reviewers.
- **Applicant Revisions:** All prospective subgrantees were provided the same opportunities to cure applications if required within standardized time periods.

Steps Taken to Ensure an Open Process: ACA conducted extensive outreach and training to ensure all prospective subgrantees had equal access to the necessary information for participation in the BEAD program. This included:

- No Restrictions on Provider Type: ACA did not impose any restrictions on the types of applicants that were allowed to apply for funding through the BEAD process.
- Easily Accessible Information: The ACA website served as a central hub of information, providing comprehensive details about the BEAD application process, eligibility criteria, deadlines, and other critical resources. The website provided direct access to Registration and Application guidance documents, recorded webinars, location data, project mapping tools, and other project application portal instructions, ensuring that all potential applicants had equal access to essential resources. Within the ACA website, ACA provided a continuously updated FAQ document and application templates for the ease of use by prospective subgrantees.
- Webinars and Office Hours: ACA scheduled webinars and office hours to provide detailed information on the subgrant application process and addressed real-time participant questions.
- FAQs: ACA developed a recurrently updated FAQ document to provide answers to common questions, including all the questions and responses from the Office Hour sections.

Steps Taken to Ensure a Competitive Process: ACA established a detailed and transparent subgrantee selection process aimed at identifying the most qualified applicants. The process included:

- Various Technology Type Providers: ACA received BEAD applications with various technology types such as hybrid fiber coaxial, fiber-optic, low earth orbit satellite, unlicensed and licensed fixed wireless, and licensed by rule wireless.
- Request for Clarifications: At the application review stage, ACA issued requests for clarification in a timely manner which included providing descriptions of the non-compliant responses and the required remediation.
- Programmatic Changes: ACA adopted the changes required to the BEAD subgrantee selection process as outlined in the BEAD Restructuring Policy Notice. All changes from the initial Round 1 and 2 application stages were captured and documented within the BEAD Program Benefit of the Bargain Round Project Application Guidance.
- Quantitative Approach: All elements of the Primary and Secondary scoring criteria were based on neutral, quantitative measures as outlined in the BEAD Restructuring Policy Notice.
- Use of Contractors: ACA contracted with external reviewers to assist with the subgrantee selection process. These included individuals with a diverse range of expertise in financial analysis, technical assessment, environmental and historic preservation, telecommunications, and program and operational management.

- Final Review: After initial reviewers completed their assessments, ACA staff conducted a final review of applications and made final determinations based on the reviewers' evaluations and recommendations.

ACA implemented numerous procedures and processes to maintain the integrity of the subgrantee selection process and to ensure all application reviewers were properly trained, qualified, and objective. This approach allowed ACA to provide a fair, open, and competitive subgrant application process.

1.3 No Applications Received

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

Not Applicable

1.4 Revisions of Eligible CAI List

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

ACA adopted the statutory definition of CAIs to conform with Section 4 of the BEAD Restructuring Policy Notice. ACA revised the Eligible CAI list for the Benefit of the Bargain Round by removing CAIs that are not qualified under the statutory definition.

1.5 Retention of Subgrantee Records

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

Yes.

3 Timeline for Implementation (Requirement 3)

3.1 Deployment Projects and Activities

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

ACA affirms it has taken measures to ensure each BEAD subgrantee will begin to provide services to customers that desire broadband service within the Project Area not later than four years after the date on which the subgrantee receives the subgrant for adherence to the federal performance requirements. All prospective subgrantees were required to certify in their project application that their construction timeline, from grant agreement signature to construction completion, will be substantially completed and operational within 4 years.

Applicants were required to develop and submit a detailed project schedule, including milestones for each phase of implementation which is also included as part of the "speed to deployment" scoring criteria guaranteeing adherence to the committed timelines. This included stages such as contracting, engineering, pole licensing, make-ready, permitting, construction, connections, etc. Each milestone represents a specific stage of the Project's breakdown for 25%, 50%, 75%, and 100% completion with the committed timeline by the Applicants. ACA will establish these committed milestones in each subgrant agreement, enforceable as conditions of the subgrant, to ensure subgrantees are making reasonable progress toward meeting the four (4) year deployment deadline. This binding schedule as part of the subgrant agreement will ensure structured oversight and timely progress during the period of performance.

ACA also required the prospective subgrantees to have their detailed network designs, diagrams, project costs, and timelines with milestones for project implementation certified by a Professional Engineer prior to the execution of the subgrant agreement.

Additionally, ACA affirms that all BEAD subgrant activities will be completed at least 120 days before the end of ACA's period of performance, in accordance with 2 C.F.R. 200.344 through timely closeout and that all programmatic BEAD grant activities undertaken by the ACA are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

ACA BEAD subgrants primarily will be made on a fixed subaward basis, following all requirements of NTIA's modifications to the Uniform Guidance as provided by final rule. Subgrantees will receive a project mobilization milestone disbursement followed by periodic disbursements based

on their actual buildout progress as reported every six months. Funds will be distributed based on the subgrantee's completion of work in accordance with the deadlines set forth in the grant agreement. Through subgrantee monitoring and reporting, ACA will track the progress of projects in relation to the grant agreement milestones. Detailed and robust monitoring, compliance, and reporting guidelines have been developed by ACA to ensure subgrantee's accountability during the period of performance and the federal interest period.

As noted in the ACA's BEAD Compliance, Monitoring and Reporting Guidelines and the Subgrant Agreement, monitoring activities will include desk reviews, on-site visits of deployment activities, and meetings with ISPs. Subgrantees are also required to submit semiannual and annual reports that provide an update on the percentage of project completed to date, financial expenditures, locations served, and other applicable performance metrics. ACA will monitor both administrative and financial compliance and the programmatic requirements relating to Network Capabilities, Deployment Requirements, and Service Obligations. ACA will only disburse funds for completed deployment activities that comply with the terms included in the subgrant agreement and will withhold funds for failure to do so. In addition to the grant agreement, ACA has also developed a claw back policy to clearly define provisions for non-performance and failure to meet statutory obligations.

Through these commitments, ACA will ensure that all BEAD activities will be completed within the mandated timeframes through streamlined reporting, compliance, and accountability requirements. This comprehensive monitoring process aims to meet all federal guidelines and facilitate timely project completion for the BEAD projects.

4 Oversight and Accountability Processes (Requirement 4)

4.1 Waste, Fraud, and Abuse Hotline Details

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

Yes, the Arizona Commerce Authority (ACA) has a public waste, fraud, and abuse hotline.

How to Report:

ACA's Ethics Officer: If any irregularities are suspected, they can be reported to the ACA's Ethics Officer at complaints@azcommerce.com. An anonymous reporting form is also available at ACA Policies.

U.S. Department of Commerce, Office of Inspector General Hotline: Allegations of fraud, waste, abuse, and mismanagement can also be reported anonymously through the Office of Inspector General Hotline at 1-800-424-5197.

4.2 BEAD Monitoring Plan and Agency Policy Documentation

Attachments: *Upload the following two required documents:*

1. *BEAD program monitoring plan;*
2. *Agency policy documentation which includes the following practices:*
 - a. *Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and*
 - b. *Timely subgrantee (to Eligible Entity) reporting mandates.*

See Exhibit 6 for the BEAD Program Monitoring and Compliance Plan and Exhibit 7 for Reporting Plan.

See Exhibit 8 for the Draft BEAD Subgrant Agreement and Exhibit 9 – Clawback Policy for the Agency Policy Documentation.

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

- a. *Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual*

reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;

- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;*
- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;*
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;*
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);*
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer;*
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.*

Yes. ACA will communicate the requirements stipulated above to all prospective subgrantees by conducting outreach efforts to participating stakeholders. ACA will also post a draft template of its broadband deployment subgrant agreement on their website demonstrating that all required components, including alignment to the BEAD Restructuring Policy Notice, are included.

5 Local Coordination (Requirement 5)

5.1 Public Comment Period on the Final Proposal

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

In compliance with NTIA's BEAD Final Proposal Guidance for Eligible Entities, Version 2.1, issued in July 2025, ACA conducted a seven-day public comment period from August 27 - Sept 03, 2025. The public comment period will be promoted through website posts. An online comment form will be available. All stakeholders, including the political subdivisions are encouraged to share their feedback on the information provided in the draft proposal.

A high-level summary of the comments received will be provided upon final submission of this Final Proposal to NTIA along with a description of how ACA incorporated feedback into its Final Proposal submission.

It is ACA's commitment to ensure that reliable high-speed internet access is accessible to every household and community in Arizona through the BEAD program. We value your input as we continue to strive towards this objective.

6 Challenge Process Results (Requirement 6)

6.1 Challenge Process Certification

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

Yes. ACA certifies that it successfully completed the BEAD Challenge Process on 6/30/24 and received approval of the results from NTIA on 12/12/24.

6.2 Challenge Process Results

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

ACA posted the challenge process results and the final location classification on the website here: <https://www.azcommerce.com/broadband/initiatives/bead>

7 Unserved and Underserved Locations (Requirement 7)

7.1 Certification of Broadband Service Coverage to Unserved Locations

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

Yes.

7.2 Coverage of Unserved Locations

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

Not applicable

7.3 Coverage for Unserved Locations Documentation

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

Not applicable

7.4 Certification of Broadband Service Coverage to Underserved Locations

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

Yes.

7.5 Coverage of Underserved Locations

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

Not applicable

7.6 Coverage of Underserved Locations Documentation

(Optional – Conditional on a ‘No’ Response to Intake Question 7.5): If applicable to support the Eligible Entity’s response to Question 7.5, provide relevant files supporting the Eligible Entity’s determination.

Not applicable

7.7 Certification of Documentation Unserved or Underserved Locations

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

Yes.

7.8 Certifications of Enforceable Commitments

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

Yes.

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

11.1 Reducing Costs and Barriers to Deployment

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

ACA has made significant progress in identifying and implementing key strategies aimed at reducing barriers to efficient deployment and effective cost management by launching a permitting initiative since the approval of Initial Proposal Volume II. The implementation status for each activity outlined in the Initial Proposal is as follows:

Promoting Use of Existing Infrastructure: In-progress. The ACA has been working with the Arizona Department of Transportation (ADOT) as its implementation partner for the Arizona Broadband Statewide Middle-Mile Strategic Plan, which creates a robust middle-mile infrastructure for promoting the use of existing infrastructure. Additionally, as part of the permitting initiative for the BEAD program, ACA has conducted extensive interviews with state agencies (including ADOT, the State Historic Preservation Office, Arizona State Land Department, etc.) and Internet Service Providers (ISPs) to identify effective strategies and leading practices for deploying cost-effective and rapid broadband infrastructure, with a focus on streamlining permitting processes. The agencies emphasized leveraging existing infrastructure and right-of-way (ROW) access, while ISPs highlighted opportunities for efficient design and deployment facilitated by shared infrastructure and early coordination. These valuable insights derived from these engagements will be compiled into a leading practice report which will serve as a critical resource for guiding ACA's BEAD subgrantees and informing the development of enhanced permitting support resources.

Promoting and Adopting Dig Once Policies: In progress. Arizona Revised Statutes Title 28, Article 14 has adopted a "Dig Once" policy to all roadway construction projects since 2012 for installing conduit and other infrastructure to accommodate future broadband deployment, reducing costs and barriers to deployment for ISPs. ACA has a strong partnership with ADOT and promotes and supports the adoption of dig-once policies. Under Arizona's 811 Program, digging activities are coordinated with broadband providers to minimize disruptive excavation and require notifying the Arizona Blue Stake, a nonprofit organization that operates a notification center in the state. For leveraging these initiatives for the BEAD program, the ACA also engaged with local governments to promote Dig Once policies and streamlined permitting processes by developing standardized permitting practices and infrastructure solutions that could be shared with BEAD subgrantees. ACA is committed to providing guidance to subgrantees for the BEAD funded projects.

Streamlining Permit Process: In progress. The ACA has adopted a data-driven approach, identifying essential steps to eliminate barriers and reducing costs by taking the following steps:

- Establish strong relationships with permitting agencies and local governments to create resources to guide subgrantees through permitting processes and requirements for the BEAD Program.
- Develop standardized practices from agency and ISP interviews to streamline permit application reviews.
- Collaborate with ISPs, state agencies, and local government to reduce review cycles and improve turnaround times for expediting the permitting processes.
- Conduct webinars to educate local government stakeholders on permitting requirements and processes.
- Enhancing coordination by collecting data from counties and state agencies, creating centralized resources to minimize duplication and administrative burdens.

Streamlining Cost-effective Access to Poles, Conduits, Easements: In progress. ACA is taking several steps to streamline the process for cost-effective broadband expansion:

- Established relationships with publicly owned and cooperative electric utilities to facilitate the use of pole attachments for broadband deployment and ensuring efficient grid monitoring and increased operational efficiencies.
- Collaborate with governmental and quasi-governmental entities to map conduits and existing infrastructure to determine how subgrantees can utilize them for last-mile broadband service deployments in urban areas.
- Provide guidelines and support to ISPs for obtaining permits or easements from private landowners for broadband infrastructure installation.

Streamlining Right of Way: In progress. ACA is collaborating with local governments and state agencies to simplify right-of-way access permits and ensure affordable fees. Broadband infrastructure providers for BEAD can request access to ADOT's right-of-way and conduct for broadband deployment at cost-based rates. ADOT's process also prioritizes the implementation of the "dig once" approach for ensuring a cost-effective deployment of broadband infrastructure and reduces the expenses and disruptions associated with future network expansions.

Overcoming Regulatory Constraints: In progress. ACA will accelerate broadband deployment and reduce regulatory obstacles by promoting the efficient use of existing infrastructure and overcoming regulatory barriers for BEAD program implementation through the Interagency and Community Broadband Advisory Council in Arizona. Through quarterly meetings, members analyze and recommend suggestions for efficient deployment by identifying hurdles and sharing best practices in working groups. Additionally, ACA will work with state offices to establish streamlined EHP processes that prioritize broadband infrastructure projects and ensure timely completion of the reviews. This will include close coordination with agencies such as the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), and the Arizona Department of Environmental Quality (ADEQ).

11.2 Compliance with Federal Labor and Employment Laws Certification

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

Yes.

11.3 Compliance with Federal Labor and Employment Laws Exception

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

Not applicable.

11.4 Certification of Low-Cost Broadband Service Option

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

Yes.

11.5 Low-Cost Broadband Service Option

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

Not applicable.

11.6 Certification of Reliability and Resilience for BEAD-funded Networks

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

Yes.

11.7 Reliability and Resilience of BEAD-funded Networks

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

Not applicable.

12 Substantiation of Priority Broadband Projects (Requirement 12)

12.1 Deployment of Priority Broadband Projects

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

Priority Broadband Project Definition:

The ACA determined priority broadband projects by following NTIA's BEAD Restructuring Policy Notice, Infrastructure Investment and Jobs Act (IIJA), codified at 47 U.S.C. § 1702(a)(2)(I), criteria articulated from NTIA FAQ v13 issued in July 2025, and outlined in the ACA's BEAD Program Application Evaluation Criteria & Scoring Rubric. Applicants must submit evidence as a part of their application that their proposed deployment of technology or mix of technologies were able to meet the criteria for priority broadband projects.

The ACA analyzed projects areas that have a high home density per square mile and would therefore need to meet capacity demand. For a provider's application to be considered for priority status in high dense areas, their deployment, as described in their application, must meet speed and capacity objectives. ACA reviewed applications for compliance with speed requirements, necessitating technologies to offer minimum speeds of 100 Mbps downstream and 20 Mbps upstream with latency under 100 milliseconds by 2026. Non-LEO technology should offer speeds of at least 1 Gbps downstream and 500 Mbps upstream by 2030, while LEO technology must meet similar requirements by 2036.

Within an application for a project area or combination of project areas, the applicant must demonstrate that they have the ability to meet capacity and plan for annual growth during peak times based on the BSLs included within the project area or given set of project areas applied for.

Consistent with the Restructuring Policy Notice, if the ACA determined that selecting a priority broadband project would incur excessive costs to the program, the ACA selected a lower cost non-priority broadband project. This alignment ensures that proposed projects are consistent with the ACA's goal for delivering cost-effective, reliable, and scalable broadband infrastructure across Arizona.

13 Subgrantee Selection Certification (Requirement 13)

13.1 Subgrantee Scoring Criteria

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

The Arizona Commerce Authority (ACA) followed 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 was 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 had 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).

The Applicant could 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 were encouraged to include at least 90% of BSLs under the Priority Broadband Project category where they meet future scalability and performance standards, and classify the remaining BSLs as non-priority, where scalability standards are not applicable.

During evaluation, both the Priority and Non-Priority projects were individually reviewed and scored based on the applicable scoring criteria.

- **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 were encouraged to include at least 90% of the Unserved and Underserved BSLs in the Project Area.

For any excluded locations, the ACA solicited grant applications from other potential Applicants to serve these areas or negotiated with the proposed Applicant to provide a multi-provider solution to serve these areas.

For evaluation purposes, the Reference Price (Subsidy Available) for the selected Project Area was pro-rated 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 were prioritized.

The ACA prioritized Priority Broadband Projects over Non-Priority Broadband Projects for a Project Area. If the ACA determined that selecting a Priority Broadband Project for the same project added excessive costs to the Program, ACA selected a lower cost Non-Priority Broadband Project. The ACA utilized its internal cost-benchmarking analysis and CostQuest Associates (CQA) data to determine what constitutes an excessive cost.

To determine what constituted an excessive cost for evaluation and prioritization of the Project Applications, the ACA ensured that the 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: Applications were reviewed based on the Project Areas and proposed deployment of technology type to determine whether a Project Application included 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 implemented the following evaluation criteria and respective scoring weights when assessing Priority Broadband Project Applications submitted by eligible Applicants. These criteria were 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 was provided for each scoring category below.

Each Project Application could earn a maximum of 500 points. The evaluation criteria were 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 encompassed 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 was 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 recommended either preliminarily selecting or entering into negotiations with the Applicant, or 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 prioritized Project Applications with the lowest cost based on minimal BEAD Program outlay. This category covered 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 scored more points. If this Primary Scoring was not determinative, then the Scoring Evaluation Criteria outlined below was utilized by ACA.

Additionally, the ACA assessed 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 moved forward with preliminary selection.

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

This Evaluation Criteria scored 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 was pro-rated based on the number of proposed BSLs included in the Project Application.

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

- In the event of a single Project Application for a Project Area, it was considered for preliminary selection for further negotiations.
- In the event of competing Project Applications for the same Project Area, the ACA scored and prioritized 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 was > 5% of the Subsidy Available per BSL, the ACA considered 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 evaluated 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 involved selecting a proposal that was 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 was one or more competing Project Applications within 15% of the lowest Subsidy Requested per BSL proposal, the ACA scored and prioritized 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 assessed 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 were 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 evaluated 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 was evaluated on the ability to meet the evolving connectivity needs as defined by ACA by the following:

Applicants were 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 had to 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 was scored against a sliding scale for a maximum of 75 points. The Applicant was required to 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 was:

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 had identified preliminary or provisionally selected subgrantees during Round 1, the ACA gave 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 was conducted with the following criteria similar to the approach for the priority broadband deployment projects:

Primary Scoring Criteria – Minimum BEAD Program Outlay

The ACA prioritized Project Applications with the lowest cost based on minimal BEAD Program outlay.

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 was selected for a preliminary award.

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

This criterion evaluated the cost-effectiveness of the selected Project Area by evaluating the Subsidy Requested per BSL against the Subsidy Available per BSL.

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

ACA also evaluated 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.

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

Secondary Scoring Criteria

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

The ACA will assessed 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 were 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 had already identified preliminary or provisionally selected subgrantees during Round 1, the ACA gave 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

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

14.1 Environment and Historic Preservation (EHP) Documentation

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

- 1. Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.*
- 2. Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.*
- 3. Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regionalprogrammatic-environmental-impact-statements>.*
- 4. Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.*
- 5. Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.*

Please see Exhibit 10.

15 Consent from Tribal Entities (Requirement 15)

15.1 Documentation of Consent from Tribal Entities

Attachment(s) (Required if any deployment project is on Tribal Lands):

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

The ACA State Broadband Office is utilizing the Conditional Limited Programmatic Waiver for the tribal consent requirement.

This waiver will be utilized until all necessary resolutions of consent are obtained. In accordance with NTIA guidelines, ACA will submit all required documentation within six months of Arizona's BEAD Final Proposal approval.

16 Prohibition on Excluding Provider Types (Requirement 16)

16.1 Certification on Exclusion of Provider Types

Question (Y/N): Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

Yes.

17 Waivers

17.1 Waivers for BEAD Requirements

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

Not applicable.

17.2 Waivers for BEAD Requirements Documentation

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

Not applicable.