# Alaska Broadband Grant Program Application Portal and Notice of Funding Opportunity Frequently Asked Questions

The Alaska Broadband Office (ABO) is posting questions that it receives from the public while the Application Portal is open, with the newest at the top. Questions 1-114 are those that the ABO received during the Public Comment Period. Questions above 114 are those that were received after the close of the public comment period, and FAQs 147-168 are new since the last FAQ update. To have the news questions first, questions are listed in descending order.

168. Does an applicant have to apply for all BSLs within a PDPA?

Generally, yes. From the scoring section A.2. of the Alaska Broadband Grant Program:

100% Connections: subcategory A.2. will be scored based on whether all BSLs within a PDPA, or if not using PDPAs, every BSL within every community along a non-PDPA path are connected. If so, the applicant will receive 100% of the available points in this subcategory. If not, the applicant will receive no points in this subcategory:

- 15.0 Points in HCA.
- 7.5 Points in non-HCA.

Description of the sub-scoring for section A.2.: The score will be evaluated where an applicant that connects every Unserved and (where it has sufficient funding) Underserved BSL within a community and every community along a path will receive 100% of the available points in this subcategory. If not, the applicant will receive no points in this subcategory. This will be evaluated using BSLs identified in the applicants' project budget sheet provided in MQ Criterion 5 and compared to the PDPA BSL counts.

Applicants will need to notify the ABO within the Project Narrative in Criterion 5 how the applicant would like to have the PDPAs evaluated. Applicants can have the PDPAs evaluated on a stand-alone basis or can aggregate multiple PDPAs if it meets the overall goal of 100% connections

PDPA 32-01 is the exception. PDPA 32-01 may be applied for as a complete PDPA, or it is also acceptable for applicants to apply for "communities" within PDPA 32-01 using the "non-PDPA path" exception above.

- 167. Is the cost of leasing tower space an allowable expense during the period of performance?No.
- 166. During the Technical Assistance Session, the ABO indicated that if applicant-A submits a proposal for high-cost area and the project cost per BSL is over the Extremely High Cost Per Location

Threshold (EHCPLT) then by default if any applicants come in under the \$10k the other applicant-B would get the award. The recommendation was to submit multiple applications to separate the costs over the \$10k threshold.

# Assumptions based on above

A) if anyone submits a statewide application for LEO service that falls below the HC threshold, every applicant with higher costs would lose.

This assumption is incorrect. The grading matrix looks as follows:

Priority	Infrastructure	Below the cumulative EHCPLT (middle and last mile)	Above the cumulative EHCPLT (middle and last mile) Goes to scoring		
1	Fiber	If no other fiber projects. Applicant Selected with no other grading. Otherwise goes to scoring			
2	Fiber and Non-Fiber, Reliable Broadband Hybrid	Goes to scoring and generally will score higher than 3 - 6	Goes to scoring		
3	Fiber and Non-Reliable Broadband Hybrid	Goes to scoring and generally will score higher than 4 - 6 and requires a waiver	Goes to scoring		
4	Non-Fiber, Reliable Broadband	Goes to scoring and generally will score higher than 5 - 6	Goes to scoring		
5	Non-Fiber, Reliable Broadband and non- reliable broadband hybrid	Goes to scoring and generally will score higher than 6 and requires a waiver	Goes to scoring		
6	Non-reliable Broadband	Goes to scoring and requires a waiver	Goes to scoring		

B) All applications are scored based on criteria which include BSL/PDPA coverage but if you split the base cost into one application and all other cost in a secondary application it may not score the same.

This assumption is incorrect. Applicants cannot spit applications into base and secondary costs

## Questions:

- a. If one or more statewide LEO applications are submitted under the cost thresholds, does that mean there will be no fiber projects approved via ABO?
  - No. this question assumes that the only scoring criteria is cost under the EHCPLT. There are multiple scoring sections. Additionally, the matrix above identifies the infrastructure priorities.
- b. If an applicant is 'splitting' project into multiple applications, can they use the same BSL/PDPA coverage for points in like applications? Ie one app for last mile costs under threshold and a second app for all the other real costs, both using same BSL/PDPA coverage metrics
  - Split applications such as this are not allowed. Multiple applications for the same PDPA are acceptable. The most common, the ABO expects will be an application for the Unserved BSLs within a PDPA and a second application that covers both the unserved and underserved.
- 165. a. Will locations, which are covered by TBCP but were not included at the time of the challenge process, be eligible for BEAD funds?

If they reach 100/20Mbps, No.

b. If not, will that be made clear prior to the subgrant application submission deadline or after?

Prior.

164. Is there any possibility of using a fixed amount subaward model?

See FAQ #70.

163. If an applicant wants to submit criterion 1-4, 6-10, and 12-15 for review, can they be submitted before March 28, 2025?

Yes

162. Are project invoices required to be paid before submitted for reimbursement?

Yes, they are, it's on a reimbursable basis only.

161. a. If a BEAD project in high-cost area has project costs > \$10k per BSL for fiber solution are those additional costs eligible for grant funding? The NOFO and FAQ imply no additional costs approved above high cost per BSL defined by ABO until after all BSLs served.

That is correct, the extremely high-cost threshold is fixed. It's over? There still might be an award associated with that, if its fiber only and comes in under and there is a non-fiber, the non-fiber isn't even evaluated.

b. Will ABO fund higher than the 10k per BSL in a high-cost area?

We do not know the answer, most likely no.

c. Is that with or without the middle mile cost?

The middle mile has its own extremely high cost per location threshold.

d. I mean in the scenario you described where there's a fiber project <10K per BSL that gets awarded, is the cost per BSL in that fiber project in that example inclusive of middle mile too or no?

example.

160. The required letter of credit must be issued by the entity to whom the grant funds will be directly disbursed. However, Appendix A, the template provided, is written to come from the financial institution. Can you please clarify?

To clarify, Appendix A is the required Letter of Credit Commitment document and will need to come from a financial institution, either:

- a) a bank meeting the eligibility requirements set forth in 47 C.F.R. § 54.804(c)(2); or
- b) a 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.
- 159. Is the Middle Mile Extremely High Cost Per Location Threshold (EHCPLT) \$100,000? Do we know the actual dollar amount of the EHCPLT per mile?

No, the EHCPLT is not \$100,000. Please use the calculation in FAQ 158. To calculate the amount. Th final amount will not be known until the final BSL counts are known.

158. What is the current Extremely High Cost per Location Threshold (EHCPLT) amount?

There are two different types of EHCPLT:

- 1. The last mile EHCPLT is \$10,000.00/BSL in the "Rural Community" category and \$6,667.00/BLS in the "Fiber and Road" and "Non-Community Based" BSL categories.
- 2. The EHCPLT for the middle mile is not published. It can be calculated using:

- a. The High-Cost/Non-High-Cost counts by community from appendix I multiplied by the amounts in number 1. above.
- b. This resulting total the gets subtracted from the total amount available.
- c. The remainder is then divided by the total number of fiber miles to get a per fiber mile EHCPLT middle mile number.
- d. Then the per mile EHCPLT is multiplied by the miles in the mileage table by community. This results in the middle mile ECHPLT by community.
- 3. The overall EHCPLT by community is the addition of the Last Mile number calculated in 1. Plus, the result in 2.
- 157. a. If the FCC broadband map shows a BEAD unserved BSL as served with licensed fixed wireless, is that BSL eligible or ineligible for BEAD funding?
  - Licensed Fixed Wireless in considered Reliable Broadband which makes BSLs "served" with Licensed Fixed Wireless ineligible for BEAD funding
  - b. If the FCC map shows a location served, but the NTIA map shows something different, which one takes precedent?
    - The NTIA map will be the load star.
- 156. The start of FAQ If no Reliable Broadband Service technology meeting the BEAD Program's technical requirements would be deployable for a subsidy of less than the EHCPLT at a given location, an Eligible Entity is authorized to select a proposal involving a less costly technology for that location, even if that technology does not meet the definition of Reliable Broadband Service but otherwise satisfies the Program's technical requirements." Two questions:
  - a. What does an applicant need to provide in the application in order to pursue this option?
    If a company has a hybrid solution and another applicant submits a fiber only project, and both come in at or under the EXHPLT, the fiber only solution will be selected and the hybrid solution will not be evaluated.
  - b. If the program's technical requirements cannot be met under the EHCPLT (e.g., some individual BSLs are isolated and would incur an extremely high incremental cost), how should the applicant address this in the application to prevent a loss of points?
    - Each applicant will have to evaluate the risks associated with a fiber only project that may be above the EHCPLT and a hybrid program that will come underneath the EHCPLT. It is important to note that there are several scoring measures such that simply being above the EHCPLT does not eliminate an application. It simply opens to accept non-fiber applications for evaluation.
- 155. How will BEAD consider the BSLs if it's underserved? Thinking of the ATS communities. Is that reason enough for someone to exclude a portion of a PDPA?

The ABO will be evaluating the unserved solutions first. If companies have the where-with-all, to apply for the unserved only and an application for the unserved and underserved combined. Not this second option is optional.

154. Is a hybrid solution acceptable?

Yes, but a fiber only solution is submitted, and it is at or below the Extremely High Cost per Location Threshold (EHCPLT) amount per BSL, the fiber only option will be selected with no other evaluation of hybrid solution applications.

153. Is there a formal process for submitting BSL discrepancies?

No there is not. Please submit an Excel spreadsheet with the BSL ID number and the reason for the discrepancy listed out by BSL.

152.

a. What is the guidance for map formatting and submission?

The format is set up within the portal and the portal has a very specific format required. GIS parameters? No, single layer is fine.

b. Does the GIS have to have multiple layers?

No, single layer is fine.

151. How is satellite allowed if ABO required 100ms latency?

All satellite is considered unreliable and will require a waiver from the Assistant Secretary of Commerce.

150. If a BSL already got a LEO [Low Earth Orbit satellite] service via 'TBCP Use and Adoption' funding, are they still eligible for BEAD given LEO recognized solution?

LEO is not recognized as reliable, so yes.

149. If an applicant is submitting for a solution on tribal land and engaged the tribe but never got a response, can they receive an award still and get consent later? If yes what happens to award if tribe says no thanks later? and how long does an applicant have post award to get consent?

If the tribal land is owned by the tribe, you must have tribal consent, before award. If there is an easement, that shows previous consent.

148. Is 'Site Control' required for LEO solutions where the only infrastructure in tribal village is on BSL units which reside on the tribal land?

If the land is owned by the sovereign Tribe, Yes. If it is land owned by a private citizen but considered "Tribal Lands" for the purpose of the Affordable Connectivity Program (ACP), then no; site control will come solely from the landowner.

147. Allowable overhead costs not eligible? FAQ #65?

FAQ is updated with answer

146. Is there an organization to the Criterion?

Yes, the high-level organization is:

Does the applicant have the business documentation?

Criterion 1: Applicant License and Registration Information

Does the applicant have the staff?

Criterion 2: Organizational and Managerial Capability

Does the applicant have the funds?

Criterion 3: Financial Capability

Criterion 4. Other Public Funding Disclosure

What is the Network Plan?

Criterion 5: Technical Capability

Will the network be around for 10 years?

Criterion 6: Project Sustainability

Will the applicant comply with the law?

Criterion 7: Compliance with Applicable Federal, State, and Local Laws

Criterion 8: Civil Rights and Nondiscrimination Law Compliance

What are the risks to the applicant?

Criterion 9: Cybersecurity and Supply Chain Risk Management (C-SCRM)

Criterion 10: Weather/Climate/Natural Hazard Threat Assessment and Mitigation Plan

What is the risk to the environment?

Criterion 11. National Environmental Policy Act (NEPA) Requirements

Has the applicant contacted the impacted populations?

Criterion 12. Indian Tribe/Tribal Entity Proof of Support

Will the applicant meet the goal of affordability?

Criterion 13. Low-Cost Option

Criterion 14. Middle Class Affordability

Does the applicant understand the contract?

Criterion 15. Application and Grant Agreement Certification

145. FAQ #89 states that "Operating expenses and Operational Expenses are not allowable." Can you please clarify the difference between "operating" and "operational" expenses?

In this context the two words are synonymous.

144. In addition to the above, FAQ #65 states that overhead costs are not eligible. However, the NOFO (page 11) indicates that the following are eligible costs. Can you please clarify eligible versus ineligible costs in these categories?

- "Overhead costs related to the implementation of networks under this program including salaries and fringe benefits for non-construction staff (e.g., accounting, payroll, human resources), pro-rated percentages of corporate office space and other similar overhead expenses. This category has a maximum allowable indirect cost of 10% of the overall capital expenditure."
- "Personnel Costs and Operating Expenses Associated with the Construction and Deployment of the Infrastructure: Salaries and fringe benefits for staff and consultants providing services connected to implementation of the networks under this program"

FAQ #65 has been updated to reflect that there is a 10% allowable overhead allocation.

143. Per the NOFO (page 17), applicants are to provide "qualified operating or financial reports filed with the relevant financial institution for the relevant time period, along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution." Is a certification form for this item being developed, or are applicants to individually draft a statement?

Several examples are given as to the types of reports that are required.

From the NOFO "Acceptable submissions for this purpose will be the Rural Utilities Service (RUS) Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities Cooperative Finance Corporation (CFC) Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; or the CoBank Form 7; or the functional replacement of one of these reports. See Rural Digital Opportunity Fund Order, 35 FCC Rcd at 719, n. 202."

142. On page 27 of the NOFO, it states, for wage information, that applicants must "certify that applicant will receive and verify accuracy of copies of contractor(s)/ sub(s) certified weekly payroll reports and compliance with applicable labor standards upon award." Is a certification form for this item being developed, or are applicants to individually draft a statement?

The certification is a check box selection in the portal.

141. On page 27 of the NOFO, it states that applicants are to "certify to the scalability and asset life descriptions." Is a certification form for this item being developed, or are applicants to individually draft a statement?

The certification is a check box selection in the portal.

140. Per FAQ #105, applicants can submit one application for just the unserved areas in a PDPA, and another that includes the underserved areas as well. However, while there are points for serving an entire PDPA, there do not appear to be points for unserved versus underserved areas. Is there any

competitive advantage to including only unserved areas, especially since points will be deducted for not proposing an entire PDPA (per FAQ#49)?

There is no points difference between unserved and underserved. The ABO must make sure first that the unserved are served, and then if funding is left over, the underserved.

139. Will an updated version of Volume 2 be posted or is the one on the website the final version?

The version titled "State of Alaska Initial Proposal Volume 2 – Documentation" found on the Program Overviews and Timelines page of the ABO website is the final.

- 138. Submitting appendix G, required to attest the plans are in place and operational, submitting with application.
  - a. Do plans need to be in place by the time we get the grant?

Yes, plans must be in place at the time of signing the grant award, prior to first dispersal.

b. What is the requirement for Cyber Security?

The Cyber Security requirements are outlined in Appendix G, Part A.

137. 5.3.2 Reliability Commitment-What would be acceptable or framework for what you are looking for? Specific description?

A simple paragraph stating you are using standard telecom equipment that is built to 99.999% uptime. The Alaska Broadband Grant Program allows for up to 48hr outages, which represents 99.995% uptime.

136. In the budget guidance, it states to use "a capital cost MS Excel model," but there does not appear to be a template for this. Is one being developed, or are applicants to develop their own?

Applicants are to develop their own because of the different technologies.

135. Per NOFO page 17, applicants are to provide "qualified operating or financial reports filed with the relevant financial institution for the relevant time period, along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution." We are unable to locate a certification form for this item; is one being developed, or are applicants to individually draft a certification statement?

Applicants are to develop their own because of the different technologies.

134. Was this NOFO recently updated? What are the differences from the last version?

The difference between R1 and R1a of the NOFO are formatting to reduce the number of pages. Version R1b, based on feedback from the Technical Assistance Session, updates the due date associated with Criterion 3, Subsection 3.5.2.2. and Appendix B.

3.5.2.2. now reads: Certification, on Appendix B: Certification to Provide Audited Financial Statements, that it will provide financial statements audited by an independent certified public accountant no later than 90 days after the grant application deadline.

Appendix B has been updated to reflect this change.

Additionally, the ABO added the following sample language to the end of Criterion 10:

Assessment Example (Unalakleet, sourced from the Alaska State Hazard Mitigation Plan):

Earthquake		Erosion		Flood		Severe Weather		Wildfire	
Р	S	Р	S	Р	S	Р	S	Р	S
2	2	3	3	3	3	3	2	3	3

#### Legend:

P = Probability: 1 = Unlikely; 2 = Possible; 3 = Likely; 4 = Highly Likely

S = Severity: 1 = Negligible; 2 = Limited; 3 = Critical; 4 = Catastrophic

The flood assessment for Unalakleet is that flooding is likely and would have critical impacts to the community.

Sample mitigation write-up for flooding in Unalakleet (Note the below is provided as an example only, each applicant will need to create their own mitigation plan for each identified risk):

Flood: The broadband infrastructure in Unalakleet will mitigate the likely flooding by anchoring the poles such that they can withstand a X foot water surge. Electronic equipment will be located above the posted flood zone. Additionally, the building where the electronics are housed will have 8-hour generator power if community power is negatively affected by a flood.

133. The certification form has different language, saying, "date to be agreed upon." Since it would not be feasible for most applicants without an audit to provide one by the application deadline, should we assume the form is correct and the NOFO language is in error?

The ABO has updated the language to reflect a due date 90 days after the application deadline.

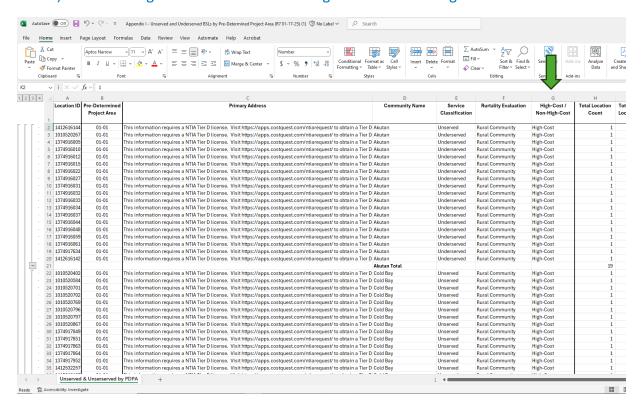
132. The NOFO (page 15) notes a "Certification to Provide Audited Financial Statements, that it will provide financial statements audited by an independent certified public accountant no later than the grant

application deadline; and" (sentence ends here): Is the "and" a typo, or is there more to this sentence? (The following sentence appears to shift to applicants with audited financials.)

The "; and" has been removed.

131. Are the high cost and non-high-cost area predetermined on a map somewhere?

No. But the information is available in Appendix I. Column G of Appendix I (see the green arrow below) lists the categorization of the BSL's as High-Cost and Non-High-Cost.



130. Is the CostQuest, Tier D license free?

Yes. But to get the license, applicants must also have an FCC Federal Registration Number (FRN).

129. What does SAM stand for?

System for Award Management.

128. What would constitute a successful entry in Criterion 10: Weather/Climate/Natural Hazard Threat Assessment and Mitigation Plan?

The ABO has added the following example after Criterion 10 in the updated Alaska Broadband Grant Program NOFO.

Assessment Example (Unalakleet, sourced from the Alaska State Hazard Mitigation Plan):

Earthquake		Erosion		Flood		Severe Weather		Wildfire	
Р	S	Р	S	Р	S	Р	S	Р	S
2	2	3	3	3	3	3	2	3	3

## Legend:

P = Probability: 1 = Unlikely; 2 = Possible; 3 = Likely; 4 = Highly Likely S = Severity: 1 = Negligible; 2 = Limited; 3 = Critical; 4 = Catastrophic

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Flood: The broadband infrastructure in Unalakleet will mitigate the likely flooding by anchoring the poles such that they can withstand a X foot water surge. Electronic equipment will be located above the posted flood zone. Additionally, the building where the electronics are housed will have 8-hour generator power if community power is negatively affected by a flood.

127. Is there an opportunity for "curing" applications?

No. However, if applicants submit Criterions 1-4, 6-10, and 12-15 by March 28, 2025, the DCRA and ABO will review the submissions by April 4, 2025, and if submissions are defective, the ABO will let the applicant know, at a high level, what the defect is. This will give applicants time to modify their responses before the due date of April 14, 2025. Note Criterion 5: Technical Capability and Criterion 11. National Environmental Policy Act (NEPA) Requirements are not available for this pre-review.

126. Does a tribe as a souverain government need to have a business license?

Yes.

125. General Counsel is often an external contractor rather than an employee. Would that be described as such in Criteria 2.

Yes. That is acceptable.

124. If submitting multiple applications, is a separate letter of credit or bond commitment needed separately for each?

No. If you are submitting for unserved and unserved/underserved, and you have a bond for the unserved/underserved, it will take care of the unserved. If you are submitting for PDPAs 1,2,3, etc., you will need a bond for all three PDPA's. The bond or letter of credit must cover the entire dollar amount being applied for.

123. Will you please confirm that if a company does not have individual audited financials that the consolidated financials of its audited parent company will be acceptable. In other words, if the company is a subsidy of a larger company will the audited financials of the large company suffice?

The ABO may accept the audited financials of a parent company if the audit:

- 1. Adheres to Generally Accepted Government Auditing Standards (GAGAS): <u>Government Auditing Standards</u> (GAO-24-106786), and
- 2. Includes an audit of the operations of the subsidiary expending the federal funds.
- 122. What is an Enforceable commitment?

Enforceable commitment is an award by one of the federal agencies to build out. If there is already an award by the federal government to build broadband to a location that is an Enforceable commitment, then those locations are removed from our list and are Ineligible for funding

121. What is a BSL?

From the FCC:

A broadband serviceable location (BSL) is "a business or residential location in the United States at which mass-market fixed broadband Internet access service is, or can be, installed."

- Residential BSLs include all residential structures, including structures that are (or contain)
  housing units or group quarters (as those terms are defined by the United States Census
  Bureau).
- Business BSLs include all non-residential (business, government, non-profit, etc.) structures that
  are on property without residential locations and that would be expected to demand massmarket, non-enterprise-grade Internet access service.
- 120. Does the change to a 10-year asset life impact the low-cost and middle-class plans?

Low-cost and middle-class plans are only required for the 10-year asset life.

119. With the 10-yr asset life affecting plans, true for open access?

Yes.

118. Can paper applications be submitted?

Yes, from pages 5 and 6 of the Alaska Broadband Grant Program NOFO:

Complete applications may be submitted electronically through the online application portal, available at <a href="https://reigrants-">https://reigrants-</a>

akdcced.my.site.com/recipient/s/login/?ec=302&startURL=%2Frecipient%2Fs%2F.

For applicants with access to high-speed Internet, applications should be filed electronically.

Applicants without access to high-speed internet, complete applications may be submitted to the ABO via email at ced.abo.general@alaska.gov with the subject line "Alaska Broadband Grant Application."

Paper applications may also be submitted via courier service or the United States Postal Service (USPS) to:

Alaska Broadband Grant Program, Attn: Grant Administrator 550 West 7th Avenue, Suite 1535 Anchorage, AK 99501

Facsimile (fax) copies sent to (907) 269-8125 by the application deadline will be accepted.

Applicants are required to bear in mind that if multiple applicants are attempting to submit at the same time, the facsimile resources may be in use and the application may not make in by the deadline. The ABO encourages applicants to NOT WAIT UNTIL THE LAST DAY TO SEND IN APPLICATIONS BY FACSIMILE. If the applicant's facsimile application is received after the deadline, it will NOT be considered.

117. Questions on the or concerns about the grant agreement?

Send to Jan Cox jan.cox@alaska.gov, 907-793-1244

116.

a. What does ABO consider an invalid location? Ie USFS Cabin, Lighthouse, Fish Camp Huts, Weather Station, Duck Cabin/Shack, Abandoned Mine Houses. There is a ton of locations in PWS and down Lost Coast that honestly shouldn't be in list unless you really intend for the examples above to be funded. I'd be glad to help identify just don't want to waste time and looking for guidance.

Anything owned by the federal government (USFS cabin, FAA weather station), cell/radio towers, water tanks, buildings that obviously are missing roofs or burned, downed aircraft and any abandoned industrial operation should be identified for removal. Fish Camps and Duck cabins stay in.

b. Wanted to request the CTC awarded grants from USDA ReConnect R3 (Cordova) and R4 (Pelican) be updated to remove BSLs showing as underserved and unserved in the communities of Cordova and Pelican. (Interestingly you have Chenega and Yakutat correct based on CTC awards)

The ABO relies on the FCC deconfliction analysis for the identification of enforceable commitments. Please send the updated list to both the FCC and the ABO.

115.

a. How can we show you the identified BLS's that are not valid?

Please send a list of the invalid BSL location\_ids, in an email, to Jan.Cox@alaska.gov

b. Where can we find the BLS specific number? Not all of them have addresses. If we point to the BLS on the map we can't see any numbers that are specific to the BLS in question. Basically, how to explain which BLS we are talking about?

The ABO omitted the BSL location\_id on the pop-up detail box. This has been corrected so the BSL location\_id is at the top of the details box



114. How can BSLs that don't actually exist but are in Appendix I be removed to ensure not funding invalid locations or penalize applicants for skipping invalid location?

The ABO is going over all 56,256 Unserved and Underserved BSL to validate that the BSLs are valid. If you have some of these identified, please let the ABO know which these are.

113.

a. Can BSLs that exist but are not in Appendix I be added for funding?

No.

b. and what would be the process?

There is no process to add BSLs

112.

a. What happens when new grant awards are made for ReConnect and TBCP that will service BSLs in Appendix I?

The awarded BSLs will be removed from the list.

b. Are these BSLs removed and no longer eligible for BEAD?

Correct, the locations will no longer be eligible for BEAD funds.

c. How will these changes be communicated to applicants?

Within a week of the ABO finding out, the ABO will remove them from Appendix I, post them to the website and send out a List Serve notification.

- 111. Appendix I BSL list includes locations that have been awarded grants already for fiber buildouts.
  - a. Will this list be updated to remove those locations?

Yes

b. If not, how are locations with commitments vetted before BEAD awards?

The Unserved and Underserved list is constantly being updated. The FCC posts the list of enforceable commitments.

110. In the Draft NOFO one of the minimum requirements is that applicants have a Universal Service Administrative Company (USAC) number (if required). If the applicant is not currently serving any USAC institutions, is a USAC number required or not?

If the applicant does not participate in the USAC program, then the USAC number is not required. If an applicant is using USAC funding as a justification for the sustainability model, then the applicant will need to provide the USAC number.

109. Assuming applicants may submit multiple parallel proposals for a single PDPA or alternately a single application for a PDPA with options that may vary in coverage, technology, and cost, will a single Letter of Credit or Performance Bonds good for the maximum amount for a single application's options or for the maximum amount of the most expansive and expensive of submitted parallel proposals be sufficient. Parallel and thus redundant Letter of Credit or Performance Bonds for an applicant's single PDPA proposal(s) seem impractical and unnecessary.

Within the Alaska Broadband Grant Program, the applicants need to provide a "letter of commitment" for the Letter of Credit or Performance Bond, not the actual Letter of Credit or Performance Bond. If the applicant becomes a grantee, the Letter of Credit or Performance Bond will need to be for the entire award.

108. There are outlying clusters of BSLs and individual flier BSLs scattered within various PDPAs. May applicants submit varying parallel proposals for an individual PDPA to propose serving the majority of BSLs with fiber, but not all vs. serving all BSLs with fiber, FWA & satellite vs. serving all BSLs with fiber (at an extremely high cost)? How will the ABO's consideration and scoring treat parallel proposals that may include just Unserved BSLs vs. all Unserved and Underserved BSLs or proposed mixed technology and pricing models?

The ABO will have to evaluate each on an individual basis, as there are multiple other variables that will need evaluation.

107. Regarding A.1 in the Primary Scoring Criteria: How will the Minimal BEAD Program Outlay Per Location criteria work? Take the following situation for example:

Provider A submits a bid for all BSLs in a particular PDPA and the cost per location is \$10,000.

Provider B submits a bid for a subset of BSLs in a particular PDPA and the cost per location is \$5,000.

Will Provider A (and the entire PDPA) be subject to the Cost Per Location of Provider B, even though many of the BSLs in the Specific PDPA are not served by Provider B? Phrased another way, will the Program Outlay per Location be measured at the PDPA level, or elsewhere?

This question assumes that the evaluation is binary. This is not the case and as such this question without the other variables is unanswerable.

106. Are there additional points available under Primary Scoring Section A for Matches in a High-Cost Area? The Max Points available indicate that there are no points available (15.0 + 15.0 = 30.0) in High-Cost Areas for Providers looking to provide a match. It appears to be allowed under the Primary Criteria Scoring A3 (first bullet) but in the Scoring Matrix it indicates that there is a maximum of 30 points available in a High-Cost Area.

Applicants can score over 100 points for both the high-cost and non-high-cost with a match above the requirement. "\*Bonus Points Available for Match over and above the required (1 point for every 1% above)". For example, with a 1% match in a high cost area, the applicant will receive an additional 1 point over the cumulative points.

105. Since the ABO will prioritize fiber infrastructure awards at or below the EHCPLT first for projects to Unserved locations and if funding is available to support projects to Underserved locations, may applicants submit multiple applications for the same PDPA to cover just Unserved BSLs and Unserved as well as Underserved BSLs or a single application with embedded options and pricing?

Applicants may submit multiple applications for the same PDPA, one covering unserved and another covering unserved and underserved.

104. When in Alaska's BEAD process will the extremely high cost per location threshold (EHCPLT) be determined and potential applicants informed? How will the ABO determine this cost and set the threshold? It seems essential to have this information available early on to enable prospective applicants' strategic planning, cost modeling, and realistic proposal development.

The "middle mile" EHCPLT is determined by the remainder of the allocated funds divided by the total unserved and potentially underserved locations after removing the last mile amount. The middle mile EHCPLT will be calculated after all enforceable commitment BSLs have been removed.

103. Under Criterion 2: Organizational and Managerial Capability of the Draft NOFO, there are seventeen different identified job titles or equivalent for which resumes are required within the response narrative

and all elements of which are required to be present for a pass. Hard to imagine any applicant would have all those titled roles or in many cases lack many of them. In many cases prospective applicants' specific functions described may be outsourced to contractors. This criterion as constructed seems a bit excessive, and we suggest reframing it in a more real-world practical manner. Where and as necessary, may the applicant describe how each of those positions' functions and roles is met by internal staff or external contractors as well as indicate which named staff, though not titled specifically for a listed position, has those responsibilities under them?

The ABO added "or equivalent" to accommodate the situation where not every company has every position but has the functionality of the position.

102. What constitutes a 20 year asset life. Does this include or exclude electronics for Fiber assets. Does this include or exclude electronics for non-fiber assets?

The required asset life has been revised down to 10 years. This includes electronics for both fiber and non-fiber assets.

101. We noticed that for fiber there is a very small point difference between a project that takes less than 47 months vs a project that takes more than 47 months. Is there an upper limit to how long a project will take? Hypothetically, would a project slated to take 48 months be scored the same as a project slated to take 160 months?

With an additional waiver to add 12 months, projects cannot take longer than 60 months. Any project that exceeds 60 months will not be considered.

100. Will 6GHz FWA be considered reliable broadband?

The NTIA does not consider 6GHz as reliable broadband.

99. What happens if a project that has been submitted is complete or largely complete by the time the award is made? How does that impact the projects eligibility, and does it potentially impact the amount of the award?

The ABO will work to remove served BSLs from the final list.

98. The NTIA Tribal Broadband Connectivity Program Round 2 awards are expected to occur no later than mid-January 2025. How will the ABO incorporate deployments due to TBCP Round 2 awards? Would the ABO consider a short delay in the application start date to allow potential applicants to incorporate those awards into their planning?

The ABO will not be delaying the program but will be removing BSLs that are added to an enforceable commitment.

97. NTIA and the ABO have both reserved the right to waive certain requirements of the NOFO. How will the ABO administer the waiver process? How should applicants seek a waiver of NOFO requirements?

Waiver requests will need to be submitted with the application. The waiver template will be posted on the ABO website.

96. The draft grant program defines "asset life" as "a duration of no less than 20 years and includes all upgrades and replacements necessary to maintain the current FCC minimum bandwidth requirements on the network Asset." Volume 2 references useful life of network assets and a 10-year requirement. Are these terms interchangeable? If so, what is the defined term, 10 years or 20 years?

The required asset life is 10 years, not 20 years.

95. Sections 13.1.2.5 and 13.2.2.5 define service availability as "80% for 80% of tests at Busy Hour." What specific testing methodology and reporting criteria are required to provide this measurement?

The service characteristics outlined in the proposed plan include speeds and latency requirements that must be met in accordance with the FCC's 80/80 metric. That is, if the ABO or any other entity assigned by the ABO tests the end user speeds of these plans, the requirements will only be met if 80% of tests meet or exceed 80% of the required speeds and 95% of latency measurements must be at or below 100 milliseconds round trip. For instance, if the ABO runs 100 speed tests at a selection of locations that subscribe to low-cost broadband service plans, then at least 80 of those speed tests must meet 80% of the speed requirements and 95 latency measurements must meet requirements. For the purposes of these specifications, "typical" download or upload speeds mean that 80% of speed tests must demonstrate at or above 80% of such speeds. Furthermore, 95% of latency tests must demonstrate no more than 100 milliseconds of latency.

94. Section 5.1 Proposed Network Design requires applicants to "Include a description of how the proposed network will deliver the broadband services that meet the requisite performance requirements to all Unserved and Underserved Broadband Serviceable Locations covered by the project(s)." Can an application address only unserved BSLs?

Yes.

93. Under NOFO Criterion 7, if an applicant will be utilizing a consultant to manage post award compliance for the project and associated reporting but will be bidding that out (in accordance with CFR procurement if the ABO is not using Fixed Award), should that explanation be provided as the response?

Yes.

92. Criterion 4 provides that in the event a grant was received, and locations are served, those BSLs would be identified as served on the ABO map. Is the applicant still required to provide the BSL list?

No. The ABO will remove the enforceable commitments and then provide an updated list based that removes the enforceable commitments.

91. The NOFO indicates Criterion 2 and Criterion 3 have 20,000 character limit(s). Will there be specific limits per response or a larger input area with that restriction?

All Criterion now have a 40,000 character limit. If the response exceeds the limit, please attach a MS Word file with the reminder of the answer.

90. The NOFO indicates technical assistance will be provided in three sessions. When will the dates of these sessions be published and will there be access for remote attendance?

Yes, there will be virtual attendance options. The ABO is working on the specific dates for the Technical Assistance sessions.

89. Eligible project categories include Operating Expenses and Operational Expenses. Can the ABO confirm that post-award grant administration expenses are allowable under these categories?

Operating expenses and Operational Expenses are not allowable under the Alaska Broadband Grant Program.

88. The ABO response in Volume 2, Section 02.04.13: Deployment Subgrantee Qualifications: Technical Capability appears to be identical to Volume 2, Section 02.04.14: Deployment Subgrantee Qualifications: Compliance with Laws. Was that intentional? If not, what are the differences?

The ABO assessed and the NTIA approved that Criterions 10 and 2 satisfy the requirements in both 02.04.13 and 02.04.14.

87. Given the complexity of the application requirements, will the ABO engage in a curing process with applicants?

No.

86. Can applicants submit a single PE-certification letter certifying the technical requirements of the application, rather than each document?

If the letter details each document being certified, yes.

- 85. Would the ABO please explain the reference to a requirement for the use of buried fiber in Section 02.04.01 of Volume 2?
- a. Tundra surface lay is a technique for cost-effective installation of fiber. Armored cable is installed on top of tundra, minimizing damage to the tundra and potential erosion, and then over time the cable gradually embeds into the subsurface layer.

The reference to buried fiber is an example. Tundra surface lay fiber is an apt example of appropriate environmental and climate resilient deployment.

84. When will the 4-year project completion clock begin to run? (e.g., after the grant agreement is signed, after environmental/permitting approval, other)? Given the long lead times for permitting and the 4-year completion requirement, it will be challenging for grantees to complete projects on time.

The timeline begins at the time of signing the contract between the SOA and the grantee. The permitting issue is known to the ABO and that is why the OPMP will be critical to assist in expediting the permitting process.

83. Would the ABO please explain what an applicant is committing to when agreeing to use the Office of Project Management and Permitting (OPMP)?

OPMP becomes the facilitator for the permitting process. The OPMP will serve to eliminate bottlenecks, should they come up, in the permitting process. The ABO will be funding the OPMP staff on the grantee's behalf.

82. The NOFO requires a Build-out Timeline. Is the ABO offering a Fixed Award Amount for the grants, which would require the Timeline to serve as parameters or metrics under which the funding is released?

There is no Fixed Award option. The timeline is required to ensure that the 4-year build out timeline will be met.

81. Appendix H states that "Grantee will not impose data usage caps in plans provided through Project Network(s) through the Broadband Program." Please confirm this requirement applies only to low income and middle-class affordability plans and not to other plans a provider may offer such as Lifeline. Can entities offer existing plans with data usage caps?

Confirmed. The unlimited data requirement only applies to the Low-Cost Option and middle-class affordability service within the BEAD/Alaska Broadband Grant Program.

80. Would the ABO consider the offering of a rate below the FCC's Alaska-specific Urban Rate Benchmark as satisfying the Low-Cost Option and/or the middle-class affordability plan requirement, either in general or through the waiver process?

No.

79. Volume II states the offering period for the Low-Cost Option must remain in place for the "useful life of network assets." Is the useful life 10 years?

Yes, the useful life is 10 years.

78. Are there criteria for who will be eligible for the low cost or middle mile options, or are grantees allowed to define eligibility?

The ABO adopted the criteria from the BEAD NOFO section IV.C.2.c.i. beginning on page 66.

77. The target of \$110 for the Low-Cost Option is the same as the low end of the middle-class affordable recurring target. Can an applicant offer a single option of \$110 for 100/20Mbps service to satisfy both criteria?

Yes.

- 76. What is the required duration (i.e. years) for the Low-Cost Option to be offered?

  10 years.
- 75. Volume 2 references a CPI adjustment for the cost of the Low-Cost Option, but the NOFO does not. Would the ABO please confirm there will be a CPI adjustment?

Yes, subgrantees are permitted to increase pricing. The increases are only permitted if: a) commensurate to year-over-year changes in the Consumer Price Index for All Urban Consumers: All Items Less Food & Energy (also known as Core CPI) as defined by the U.S. Bureau of Labor Statistics; or b) due to new or increased government mandated taxes and fees imposed on the consumer, not providers.

74. Under the NOFO, "[i]f the ABO receives more than one application for service to a location or community, the applicant with the higher score will be awarded grant funding for the location or community." What does this mean if another project has a route that passes through the community and is also awarded? In other words, will the ABO award support to both providers?

No. Duplicate awards for the same location are not permitted.

73. Appendix H states that the grantee must certify the contractor's labor weekly. Does this certification on the Federal Statement of Compliance form need to be submitted weekly to the State of Alaska with the payroll reports? Or are all the Statements of Compliance and payroll reports submitted during closeout?

The ABO will evaluate the appropriate level of reporting for grantees' contract labor.

72. Appendix H states "Under Option 3 applicants must follow all the requirements of Option 1 or Option 2, but may reduce the amount, of Option 1 - 25% Irrevocable Standby Letter of Credit or Option 2 – 100% Performance Bond, to 10% if the applicant agrees to the following requirements upon becoming a successful subgrantee." It appears that all projects are reimbursable and subject to monthly reporting. Therefore, are all projects eligible for Option 3's 10% ILOC or 10% Bond?

Yes.

71. Would the ABO consider a quarterly reporting/reimbursement period?

No.

70. Volume 2 references both a fixed subaward model (Section 02.04.01) and a cost reimbursement model (Section 02.16.02). Which type of subgrant will the ABO be awarding?

The Alaska Broadband Grant Program will not employ a fixed cost award model. The Program is using a cost reimbursement model.

69. The NOFO on page 11 states that "funds from federal programs, including funds from the Commission's Universal Service Fund programs, generally, may not be used as matching funds." Can federal High Cost Program funds be used as matching funds?

No.

68. Can you verify that an applicant apportioning some of their existing mainline or feeder fiber to get to an area could satisfy the entire 25% matching funds requirement via in-kind matching?

Apportioning some portion of existing mainline fiber does not qualify as an in-kind match unless the fiber infrastructure was introduced specifically for BEAD. An example of this is the placement of a branching unit.

67. Could an IRU on an applicant's existing middle mile network to the funded fiber project qualify as an in-kind match?

If there is a verifiable market rate for the in-kind match infrastructure and the in-kind match infrastructure has the same 10-year useful life as the new infrastructure, the ABO may work with the applicant to submit a waiver to the NTIA.

66. Are there any required procurement processes or standards aside from the minority/woman preferences?

Compliance with the Build America, Buy America Act is required.

65. Would the ABO please summarize any rules on including contingency, inflation, and overhead in the project budget?

Overheads (over a 10% allocation), contingency funds, and inflation escalators are not permissible in the capital budget.

- 64. Will the ABO accept audited financial statements from the parent company of the applicant?

  Yes.
- 63. What criteria will be used to determine whether "special circumstances" exist that warrant waiver of some or all the 25% match requirement? (see NOFO page 10.)

From the BEAD NOFO in section III.B.5.:

#### Match Waivers

In evaluating requests for waiver of the BEAD Program's non-federal match requirement, NTIA will carefully balance the Program's various objectives. It is NTIA's policy to ensure that BEAD funds are used to bring affordable broadband to all Americans. Thus, the Assistant Secretary will generally seek to minimize the BEAD funding outlay on a particular project to extend the Program's reach, and expects to grant waivers only in special circumstances, when waiver is necessary to advance objectives that are critical to the Program's success. To be considered for a waiver, an Eligible Entity must submit a request that describes 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 percent requirement.

62. Does the required letter of credit need to be issued by the entity seeking the grant, or can it be issued by a guarantor?

It must be issued by the entity to whom the grant funds will be directly disbursed.

61. For Criterion 3, Pro Forma evidence, should the total project (i.e. multiple PDPAs) be included in a single Pro Forma or is each PDPA required to submit their own financial data?

This is a decision that must be made by each individual applicant.

60.

a. Will the ABO be issuing instructions or holding technical training sessions on the use of the Appendix E financial model?

Yes

b. If so, when will the sessions be held, and will they be offered virtually?

There will be four separate sessions in January and February 2025. Three will be hybrid (in-person/virtual) and the one will be 100% virtual. When the ABO has the specific details, they will be posted on the website and a ListServe notice will be sent out.

59. For Criterion 6, Project Sustainability, would the ABO please confirm applicants can use comparable methods to Appendix E: Financial Sustainability Model to show project sustainability based on an applicant's circumstances?

#### Confirmed.

58. It appears that the pro forma showing by an applicant that it can sustainably operate the funded network required by Criterion 3, Section 3.6, is similar to or the same as the financial sustainability model

required by Criterion 6, Section 6.3. Are these documents the same, and if not, how do they differ and are applicants required to submit both?

They are different. In section 3, it is a historical view of the financial performance. The sustainability model is forward looking specific to the BSLs/PDPAs in the application.

57. How did the ABO develop the Category 2 EHCPLT of \$10,000 per BSL for local access? What costs were included in that calculation? For example, in the case of FTTx local access networks, does the EHCPLT include equipment shelters, FTTx equipment, drops, and/or inside wiring?

The \$10,000/BSL last mile EHCPLT includes all infrastructure to provide service from the Central Office (including the Central Office) to the BSL.

56. Section 02.04.09 states that in addition to the EHCPLT an additional mileage amount that is based on the mileage distance from the rural community to the nearest fiber interconnection will be provided. What is this additional amount and how will it be calculated and applied? How will applicants know the High-Cost Threshold per PDPA for Category 2 locations if the ABO does not disclose the additional mileage amount?

The middle mile count is in its own tab in Appendix E.

55. There appears to be a conflict between Volume 2 sections 02.04.09 and 02.04.10. Section 02.04.09 states that the ABO "will publish the expected EHCPLT for each category 30days prior to the application program opening." However, Section 02.04.10 sets the EHCPLTs for Category 1, Category 2, and Category 3 BSLs. Have the final EHCPLTs for each category been defined or are the final EHCPLTs yet to be released?

The last mile EHCPLT is \$6,667.00/BSL for the "Fiber and Road", and "Non-Community Based" locations. It is \$10,000/BSL for the Rural Community locations. The middle mile EHCPLT/BSL is a calculation of the remainder after multiplying the last mile amount by the appropriate BSL counts divided by the total number of middle miles. This number will change as Reconnect and Tribal Broadband Connectivity Program Round 2 awards reduce both the total number of Unserved and Underserved BSLs and the middle mile count.

54. The ABO's proposed criteria deduct points from traditional broadband providers. How does doing so ensure more Alaskans will receive affordable broadband?

This is a requirement in the BEAD NOFO.

53. How will the ABO evaluate and score partnerships between traditional and non-traditional broadband providers?

If the non-traditional provider is prime on the application, points will be awarded. If it is a traditional provider that is prime on the application, no points will be awarded.

52. Secondary scoring awards 0.0 points for Fiber projects capable of 1Gbps symmetrical and 0.0 points for 20-year asset life but does award points to non-fiber. However, NOFO page 26 states that "Applicants proposing to use technologies that exhibit greater ease of scalability with no future investment funded by the ABO and whose capital assets have longer useable lives will be afforded additional weight over those proposing technologies with higher costs to upgrade and shorter capital asset cycles. Applicant must certify to the scalability and asset life descriptions in Subsection E." Because fiber will easily be scalable with a simple upgrade of electronics shouldn't the Fiber project be weighted/awarded full points?

Fiber is already awarded these points as a function of its priority and preference. If there is a 100% fiber project that comes in under the EHCPLT, and all other project applications are either hybrid or secondary technology, the fiber project will be awarded without having to go through scoring.

51. NOFO primary scoring states "Bonus Points Available for Match over and above the required." Can this requirement be satisfied solely via in-kind match value in relation to total project cost?

It depends on many variables that will have to be evaluated on a project by project basis.

50. The NOFO indicates that Overlapping Location Deconfliction is to be resolved solely via the higher scoring application. Could the ABO revise this rule to allow for consideration of a close scoring application that is proposing to serve multiple PDPAs where the conflicting PDPA is integral to the mainline fiber to connect many more locations?

The ABO will evaluate all applications on their merit and completeness and if this is an issue, the ABO believes that this is addressed by the scoring matrix as is.

49. Should A.2 in Primary Scoring read "Connecting every BSL within a community and the associated PDPA(s)" rather than "Connecting every BSL within a community or the associated PDPA(s)"? If an applicant applies to serve only an individual community and not the entire PDPA will points be deducted?

Yes, to both parts of the question.

48.

a. Will the ABO compare scoring only for overlapping BSL determinations or across applications throughout the state? In other words, will the ABO use scoring for anything other than comparing two projects for the same locations? If the ABO plans to do so, please provide additional details.

Yes. All non-competition, non-fiber proposals will be evaluated.

b. If an applicant seeks to serve an entire census designated place in lieu of a PDPA or community, will that submission receive full points under Primary Scoring A.2 provided the applicant commits to serving all the BSLs within that census designated place?

If it covers the PDPA(s) within the area, yes; otherwise, no.

47. Volume II states that "By including a PDPA in an application, the provider commits to reach all included unserved and (where it has sufficient funding) underserved BSLs." Please explain the use of "where it has sufficient funding." Will the underserved BSLs be awarded with the unserved BSLs or will the underserved locations only be awarded if funds remain after funding all unserved BSLs?

Yes.

46. Will the ABO follow NTIA's BEAD Alternative Broadband Technology Guidance?

Yes.

45. How will hybrid or non-fiber projects using technology that meets the definition of Reliable Broadband Service be treated compared to hybrid or non-fiber projects using technology that does not meet the definition of Reliable Broadband Service? Will the ABO prioritize projects proposing the use of technology qualifying as reliable broadband service over projects using alternative technologies?

Yes, the ABO will prioritize projects proposing the use of technology qualifying as Reliable Broadband Service.

- a. NTIA has prescribed the following hierarchy for awarding Unserved and Underserved Service Projects: (1) Priority Broadband Projects (end-to-end fiber); (2) other Reliable Broadband Service projects; and then (3) Alternative Technology projects (where the cost to deploy Reliable Broadband Service is greater than the Extremely High Cost Per Location Threshold (EHCPLT))? This hierarchy will be followed by the ABO.
- b. For non-Priority Broadband Projects, NTIA has made clear that the state must first consider Reliable Broadband Service2 projects. Only when the cost to deploy Reliable Broadband Service is greater than EHCPLT can the state consider alternative technology. According to pages 38-39 of the NTIA BEAD NOFO, "[a]n Eligible Entity may decline to select a proposal that requires a BEAD subsidy that exceeds the Extremely High Cost Per Location Threshold for any location to be served in the proposal if use of an alternative Reliable Broadband Service technology meeting the BEAD Program's technical requirements would be less expensive... If no Reliable Broadband Service technology meeting the BEAD Program's technical requirements would be deployable for a subsidy of less than the Extremely High Cost Per Location Threshold at a given location, an Eligible Entity is authorized to select a proposal involving a less costly technology for that location, even if that technology does not meet the definition of Reliable Broadband Service but otherwise satisfies the Program's technical requirements."
  "b." is not a question.
- 44. Volume II states, "To the extent a potential subgrantee's proposed BEAD-funded project includes plans to deploy broadband to Unserved Service Projects or Underserved Service Projects on lands owned by a tribal entity, ABO will require that entity to submit substantial evidence (for example tribal or

corporate resolution, easement, license, or letter of approval) such tribal entity consents to the proposed project. As used here, a "tribal entity" includes a Tribal Government, a Tribal Organization, or an Alaska Native Corporation."

a. Do easements and licenses constitute tribal consent?

If it is an existing or newly negotiated contract with a tribal entity, yes.

c. What happens if there is an established ROW (e.g., from DOT or DNR) for utilities? Will the ROW have to receive new approval from a tribal entity?

Depends on the specific terms of the individual ROW. Generally, no.

d. Surface and Subsurface rights differ between BIA tribes and Native Corporations. Will the nature of a project, aerial vs buried, impact which entity must provide consent?

Yes.

e. In the case of a non-BEAD funded project that would assist in a BEAD deployment, is tribal approval required?

A non-BEAD funded project would have its own requirements. The BEAD requirements do not reach outside of the BEAD program.

43. The draft Grant Program states that prior to filing an application, applicants are required to contact, and show proof of contact or attempted contacts, each federally recognized tribal government in whose community or communities the infrastructure will be built and share the high-level plans for middle mile and last mile infrastructure that will be built in the community. What is the timing of this requirement for tribal contact?

During the application period.

42. What exactly is the definition of a PDPA? For example, is all of number 31 one PDPA or is each subgroup, i.e. 31-01, 31-02, 31-03, etc. a PDPA?

The entire 5 digit code (XX-XX) connotes a PDPA.

41. Can communities close to the project route, but not within the PDPA, be included in a project? How will that addition be evaluated?

Applicants are encouraged to "pull-in" as many PDPA 32-01 into PDPA's which the applicants are submitting. While encouraged, there are no additional scoring points.

40. If a community along the project path or within a PDPA is not considered in a project design, a detailed explanation of why the BSLs in that community are omitted is required. Is this a gating criterion? How will this be evaluated?

This is a scoring item and will be scored in the efficient use of BEAD Funding section.

39. Applicants are "encouraged but not required" to use the PDPAs created by the ABO for their BEAD application project areas. If an applicant does not include a community or BSL(s) in a PDPA in its application, the applicant must include a "detailed explanation of why the BSLs are omitted." Would a narrative explaining the cost and lack of ability to achieve a return on investment for the life of the asset be deemed sufficient for the detailed explanation, or does the ABO have a set of parameters under which it is acceptable for BSL(s) to not be included in a PDPA?

No. ROI is not a sufficient justification. For example, justification would be, the site is served, the site no longer exists, the site should be in PDPA 32-01.

- 38. Will the application allow an opportunity to explain why points should not be deducted because of the exclusion of PDPA Broadband Serviceable Locations (BSLs)? For example, will the Alaska Broadband Office (ABO) allow for an explanation:
- a. If a tribal entity whose consent is required makes unreasonable demands in return for that consent; or

Tribal consent is only applicable on lands owned by the Tribe. Project level Tribal consent is not required.

b. If a BSL is so remotely located in a community where serving it will materially increase the average cost per BSL in that community?

The ABO does not have a blanket response for this question. If there is a case to be made to move a BSL from its current PDPA into PDPA 32-01 "Non-Community Based", please let the ABO know. If there are two applications and one does not include all the BSLs within a community, the lacking application will score lower in that category.

37. How will the ABO rank multiple applications for the same community or PDPA? For example, how will the ABO rank application A that includes one PDPA against application B that includes several PDPAs, including those in application A?

Scoring will be given on a PDPA basis.

36. Volume II states that additional information is required from the NTIA for PDPAs to be fully determined. The ABO is awaiting information from NTIA regarding the Tribal Broadband Connectivity Program (TBCP) equitable distribution awards for a final PDPA count. When will the PDPAs be confirmed? Will they be confirmed before the grant program opens?

Yes and no. The BSL count will be set by the time the Alaska Broadband Grant Program opens. That being written, there are two circumstances by which the BSL list may change: an additional Enforceable Commitment or Updated FCC Broadband Map.

35. Please specify the "extremely high cost per location threshold (EHCPLT)" (referenced on page 10 of the NOFO). This number varies from state to state.

The last mile EHCPLT is \$6,667.00/BSL for the "Fiber and Road", and "Non-Community Based" locations. It is \$10,000/BSL for the Rural Community locations. The middle mile EHCPLT/BSL is a calculation of the remainder after multiplying the last mile amount by the appropriate BSL counts divided by the total number of middle miles. This number will change as Reconnect and Tribal Broadband Connectivity Program Round 2 awards reduce both the total number of Unserved and Underserved BSLs and the middle mile count.

34. What qualifies as an In-Kind Match? Could an IRU and internet connectivity onto a provider's existing middle mile network from the funded project (whether from the applicant or an affiliate) represent an in-kind match?

If there is a verifiable market rate for the IRU and it has the same 10-year useful life as the new infrastructure, the ABO may work with the applicant to submit a waiver to the NTIA.

33. Would the ABO please define which engineering documents require a professional engineer certification?

From Alaska Statute 12 AAC 36.990.(a)(8) "electrical engineering' means the branch of professional engineering that embraces studies and activities relating to generation, transmission and utilization of electrical energy, fire detection and alarm systems, control systems, electronic systems, and to telecommunications systems and facilities, including the design of electrical, electronic and magnetic circuits and components, and the technical control of their operation and of the design of electrical, fire alarm gear, control, electronic and telecommunications gear, and the organizational and economic aspects of these studies and activities..." The ABO requires professional engineering evaluation of all of the following from the BEAD NOFO page 74, which reads: "Prospective subgrantees must submit a network design, diagram, project costs, build-out timeline and milestones for project implementation, and a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project. The Eligible Entity [State of Alaska] shall not approve any grant for the deployment or upgrading of network facilities unless it determines that the materials submitted to it demonstrate the prospective subgrantee's technical capability with respect to the proposed project."

32. Footnote 3 in the ABO's NOFO states that a template would be provided as Appendix A1 for a letter committing to issue a performance bond to the applicant upon notice of award. Would the ABO please provide Appendix A1?

31.If an applicant is not awarded a community due to lower scoring, will this applicant still be eligible to receive funding for middle mile through that community if it is required to provide services to down-path communities?

Scoring is primarily on a PDPA basis and not on a community basis. If a community is outside of a PDPA and does not have infrastructure to interconnect into, and the PDPA infrastructure goes through the community, it is permissible to have funding for that middle mile. For clarity, in as many cases as possible, the PDPA's are designed to interconnect into the first point of fiber interconnection to prevent middle mile overbuild.

30. "If the ABO receives more than one application for service to a location or community, the applicant with the higher score will be awarded grant funding for the location or 1 See NTIA BEAD NOFO at 38-39; see also NTIA, Policy Notice: BEAD Selecting the Most Robust, Affordable, Scalable Technology Policy Notice (June 26, 2024), https://broadbandusa.ntia.gov/sites/default/files/2024-06/BEAD\_Selecting\_Technology\_Policy\_Notice\_0.pdf (BEAD Selecting Technology Notice). community." What does this mean if another project has a route that passes through the community and is also awarded?

There will be no duplicate awards. This instance will not occur because only one project will be funded per community.

29. Will an application to build FTTx utilizing existing (not BEAD-funded) terrestrial licensed microwave middle mile capable of delivering the required speeds constitute a Priority Broadband Project or Priority Project?

No.

28. Will an application to build a fiber project with non-fiber middle mile infrastructure be considered a Priority Broadband Project or Priority Project?

No.

27. Does "Fiber" project and "Fiber Preference" project mean the same thing?

Yes.

26. Will hybrid or non-fiber projects utilizing technology that meets the definition of Reliable Broadband Service be prioritized and awarded first before projects utilizing technology that does not meet the definition of Reliable Broadband Service?

Yes. Only if the non-fiber portions of the network meet the requirements for Reliable Broadband Service.

25. Will the application review process evaluate whether a project falls under the definition of Reliable Broadband Service? See NTIA BEAD NOFO, p. 15, 28, and 38-39.

Yes. If an applicant is not using "Reliable Broadband" a waiver is required from the NTIA.

24. If grant applicant #1 submits a solution to cover all BSLs in a PDPA (such as using an alternative technology), but grant applicant #2 wins a portion of the BSLs in a PDPA (such as using fiber), could grant applicant #1 win an award for the remaining BSLs?

Partial PDPA and partial communities will not receive full scoring in the NOFO.

23.

- Can a grant applicant submit a mixed technology solution to cover all BSLs in a PDPA?
   Yes.
- b. If so, is the alternative technology portion used in computing the applicant's average cost per BSL, effectively using alternative technology to reduce that number?

Yes. If a project is the only "fiber only" application and comes in under the extremely high cost per location threshold, It will be selected and the application with the alternative technology will not be scored.

22. What agency ensures the grant awards will be executed as promised after build-out?

The Department of Commerce, Community and Economic Development (DCCED) and the NTIA.

21.

a. If an applicant promises open access, who determines if the open access price is fair, competitive, and being offered universally?

The applicant. The applicant must follow the criteria set by the BEAD NOFO, page 69 subsection v.

"v. Interconnection Requirements and Wholesale Access

Any subgrantee receiving funds to deploy Middle Mile Infrastructure under this Program in connection with service to an Unserved Service Project or an Underserved Service Project shall permit other broadband service providers to interconnect with its funded Middle Mile Infrastructure network facilities on a just, reasonable, and nondiscriminatory basis. An Eligible Entity awarding funds for construction of Middle Mile Infrastructure shall require the subgrantee, via contract or other binding mandate, to allow such interconnection at any technically feasible point on the Middle Mile Infrastructure network (without exceeding current or reasonably anticipated capacity limitations). This duty includes, at a minimum,

the physical interconnection of the subgrantee's Middle Mile Infrastructure to a requesting party's facilities for the exchange of traffic. In addition, subgrantees shall connect to the public internet directly or indirectly and provide requesting parties with an ability to connect to the internet. Rates and terms for interconnection shall be reasonable and nondiscriminatory. Each Eligible Entity shall require each subgrantee that obtains funding for the deployment or upgrade of Middle Mile Infrastructure to negotiate in good faith with any requesting party (including public, Tribal, private, non-profit, or other parties) making a bona fide request for interconnection. Subgrantees shall report through the subgrantee reporting process established in Section VII.E.2 of this NOFO any interconnection requests made to the subgrantee during that year and the status of those requests."

- Is there and enforcement mechanism or agency currently in place?
   No.
- 20. Please outline what proof is required for "attempted tribal consent" when no tribal contact is made.

From the Alaska Broadband Grant Program NOFO, Criterion 12, page 20: "Applicants are required to contact, and show proof of contact or attempted contacts, each federally recognized tribal government (Tribe) in whose community/communities the infrastructure will be built and share the high-level plans for middle mile (where applicable) and last mile infrastructure that will be built in the community. And, if awarded, continue communication throughout the project. At a minimum, the exchange must include what was shared and any questions the Tribe(s) had and the responses to those questions. If an Applicant is unable to contact a Tribe, the applicant must show the multiple ways in which it attempted to contact the Tribe and explain why each was unsuccessful."

- 19. Will contact information be offered to help a grant applicant or awardee reach out to a BSL owner (BSL owner name, phone number, etc.)?
  - No. The ABO does not have this information

18.

a. What are the minimum obligations to reach out to the BSL owner?

Contact with the BSL is not necessary prior to the grant application. If awarded, prior to installation, the owner must give consent.

- b. Can the grant applicant get BSL owner permission after an award is known for property access consent?
  - Yes. But funding will not be released until permission is obtained.

17. Please define "non-recurring fees."

Non-recurring charges (NRC) are one-time costs associated with the provisioning of the service by the provider. These "one time" costs generally include the purchase of a new device, order processing, installation, and/or disconnection of previous circuits. Providers are allowed to recover "one time" costs in the low cost option and the middle class affordability option up to \$150.00/service for fiber and non-satellite projects and \$600.00/service for satellite.

16. Since tribes and ISPs do not have access to FCC USF High-cost funds and it is unclear who will have access to these funds in the future, will applicants be permitted to include High-cost support in their calculations to justify financial sustainability?

Tribes and ISPs have access to FCC USF funding. Restating the question, "[W]ill applicants be permitted to include High-cost support in their calculations to justify financial sustainability?" Answer: Applicants are encouraged to include all the financial resources necessary to show the sustainability of the systems. If applicants are using subsidies, they will need to show that that they are currently receiving the subsidy.

15. Will value propositions such as implementing backup middle mile be considered when making award decisions.

From the BEAD NOFO: "Eligible Entities should consider the cost to the Program per location while accounting for any factors in network design that might make a project more expensive, but also more scalable or resilient." The ABO will focus on serving all the unserved and underserved locations first. If there is the opportunity for additional considerations such as middle mile backup, the ABO will consider it.

14. Do alternative technology BSLs require less (installation, maintenance, customer service) than fiber BSLs?

Technology is not dictated by the Alaska Broadband Grant Program. It is the responsibility of each applicant to provide "reliable broadband" at a minimum of 100/20Mbps to the end BSLs under the guidelines of the "Low-Cost Option" and "Middle Class Affordability" criterion.

13. Who will manage the Grant Awards?

Primary responsibility for grant management is held by the ABO.

12. Who is the scoring committee?

Members will be from the ABO, representatives from the DCRA grants team, and outside consultants as needed.

11. Volume 2 establishes an overbroad prohibition against disclosure of an applicant's plans to serve unserved communities that directly conflicts with requirements in the NOFO and is ill-fitted to the Alaska Broadband Grant Program. These "anti-collusion protections" were not included in the NOFO. Would the ABO please clarify whether it intends to implement these rules and, if so, reconsider whether they are appropriate or counterproductive to the aims of the program?

The ABO has modified the language in Volume 2 of the Initial Proposal, to remove the conflict and allow for partnerships. In addition, the ABO has added appendix K "Affidavit of Non-Collusion" to the Alaska Broadband Grant Program.

10. What if the location was incorrectly marked as unserved but is already served with fiber ( 100/20 Mbps )?

Please let the ABO know the location of these Broadband Serviceable Locations (BSLs).

9. What if the location marked as unserved became served with fiber after the bidding, does the winner still connect the location with the additional 2nd connection and does the winner still gets paid to do the work?

Please let the ABO know the location of these Broadband Serviceable Locations (BSLs).

8.

a. What if we bid on the entire area/town of unserved marked red dot locations and we find out that some of the locations are unoccupied woodshed or storages? Do we still bring the fiber to them?

Yes.

b. Do we include them in the price of the bid?

Yes.

c. Or do we need to eliminate them before bidding?

No.

f. If so, what is the procedure of exclusion?

As of now, other than the enforceable commitment process, there is not a way to remove locations.

7.

a. The BEED[sic] rules require that all components in the BEED[sic] network be "Made in America." What happens if new connections are added to an existing network that includes electronics not compliant with this rule?

Equipment purchased and installed before an Alaska Broadband Grant Program award are not subject to Build America/Buy America requirements and existing equipment does not need to be replaced.

b. Do we need to replace the existing routers and other equipment to ensure they match the new American-made products?

No.

6. What rules, specifications, or manuals must the engineer stamping the project application adhere to for fiber placement proposal?

The stamping must adhere to Alaska Statute 12 AAC 36.990.(a)(8).

5.

a. What if the owner of one of the unserved locations we bid on is unwilling to accept the free hookup?

If the homeowner does not want the service, they cannot be made to take the service.

b. Should we still install the connection on the street for future owners, and how will we be reimbursed for that location?

If the location is identified on the map, then the location must be part of the application. If there is not an identifier, then it is at the grantee's discretion whether to build facilities. Facilities to future locations not on the broadband map cannot be BEAD-funded.

4.

a. What should we do if the cabin marked with a red dot as unserved is unoccupied and the owner cannot be located or contacted?

Build to the street side of the "drop". A "drop" is the connection from the street to the building.

b. Is it sufficient to extend the connection to the edge of the property and install a box on the street for future access once the owner is identified and expresses interest?

Yes.

c. Is there a time limit from the time owner of property asks to be connected?

Yes, 10 Years. The offer must be available to new occupants.

d. Does FCC ten days rule apply to the fiber that is brought to the edge of property?

Yes.

- 3. What if we are already serving the location with fiber but is marked with the red dot as unserved?

  Please let the ABO know the location of these Broadband Serviceable Locations (BSLs).
- 2. COMMITMENT TO ISSUE AN IRREVOCABLE STANDBY LETTER OF CREDIT -what is the percentage or how do we figure out the amount we need to ask the bank to issue the letter of credit.

## The options are:

- a. 25% Irrevocable Standby Letter of Credit from a bank or credit union (application requires 25% LOC Commitment Letter).
- b. 100% Performance Bond (application requires 100% Bond Commitment Letter).
- c. 10% Alternative Initial Letter of Credit or Performance Bond (application requires 10% LOC of Bond Commitment Letter).
- 1. How often or at what point will the authorized grant disbursements happen?

Disbursements will occur, on a monthly reimbursable basis, after the National Telecommunications and Information Administration (NTIA) approves the State of Alaska's selected subgrantees.