

## Alaska Broadband Grant Program Response to Public Comments and Questions

The Alaska Broadband Office (ABO) is grateful to all the interested parties who submitted comments and questions during the Public Comment Period. The ABO will carefully consider all the comments and, where prudent and appropriate, will update the program. Below, in no particular order, are the answers to all of the written questions that the ABO received through the public comment email during the public comment period.

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.

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).

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).

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.

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?

10 Years. The offer has to be available to new occupants.

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

Yes.

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.

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.\(a\)\(8\)](#).

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.](#)

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.](#)

d. 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.](#)

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 \(BSLs\).](#)

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 \(BSLs\).](#)

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 to remove the conflict and allow for partnerships.](#)

12. Who is the scoring committee?

[Members will be from the ABO, representatives from the DCRA grants team, and outside consultants as needed.](#)

13. Who will manage the Grant Awards?

[Primary responsibility for grant management is held by the ABO.](#)

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.

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 of the unserved and underserved locations first. If there is the opportunity for additional considerations such as middle mile backup, the ABO will consider it.

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 of the financial resources necessary to show the sustainability of the systems. If applicants are using subsidies, they will need to show that they are currently receiving the subsidy.

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.

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.

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

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.”

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.”

b. Is there an enforcement mechanism or agency currently in place?

No.

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.

23.

a. 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.

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.

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.

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.

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

Yes.

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.

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.

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](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.

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.

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?

Yes.

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 above with the exception of the organizational and economic aspects of the studies and activities.

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 20-year useful life as the new infrastructure, the ABO will work with the applicant to submit a waiver to the NTIA.

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.

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.

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.

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.

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.

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.

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

This is encouraged, but there are no additional scoring points.

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.

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.

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.

b. 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.

c. 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.

d. 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.

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 Service<sup>2</sup> 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.”

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

Yes.

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.

48. 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.

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.

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.

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.

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.

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.

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.

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

This is a requirement in the BEAD NOFO.

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 30 days 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.

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.

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.

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.

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? Correct.

60. Will the ABO be issuing instructions or holding technical training sessions on the use of the Appendix E financial model? Yes If so, when will the sessions be held, and will they be offered virtually? There will be four separate sessions in January 2025. Three will be hybrid (in-person/virtual) and the fourth will be virtual.

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.

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.

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. In order 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.

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

Yes.

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

Contingency, inflation escalators, and overhead are not permissible in the budget.

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.

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 IRU and it has the same 20-year useful life as the new infrastructure, the ABO will work with the applicant to submit a waiver to the NTIA.

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.

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.

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.

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

No.

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.

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.

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.

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?

At this time, there is not a CPI adjustment.

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

The required asset life is 20 years.

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.

78. Is 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 section IV.C.2.c.i. beginning on page 66.

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?

The required asset life is 20 years.

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.

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?

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

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.

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.

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.

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.

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

As long as the letter details each document being certified, yes.

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

No.

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 Criteria 10 and 2 satisfy the requirements in both 02.04.13 and 02.04.14.

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.

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.

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?

If the responses are greater than the limit, please attach a MS Word file with the full and complete answer.

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 provide the list based on enforceable commitments.

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.

99. 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.

100. 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.

101. 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 20 years.

102. 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.

103. 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.

104. 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.

105. Will 6GHz FWA be considered reliable broadband?

The NTIA does not consider 6GHz as reliable broadband.

106. 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.

107. 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 is 20 years. This includes electronics for both fiber and non-fiber assets.

108. 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 of 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.

109. 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.

110. 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, on covering unserved and another covering unserved and underserved.

111. 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.

112. 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 particular 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.

113. 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.

114. 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. If the applicant becomes a grantee, the Letter of Credit or Performance Bond will need to be for the entire award.

115. 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.