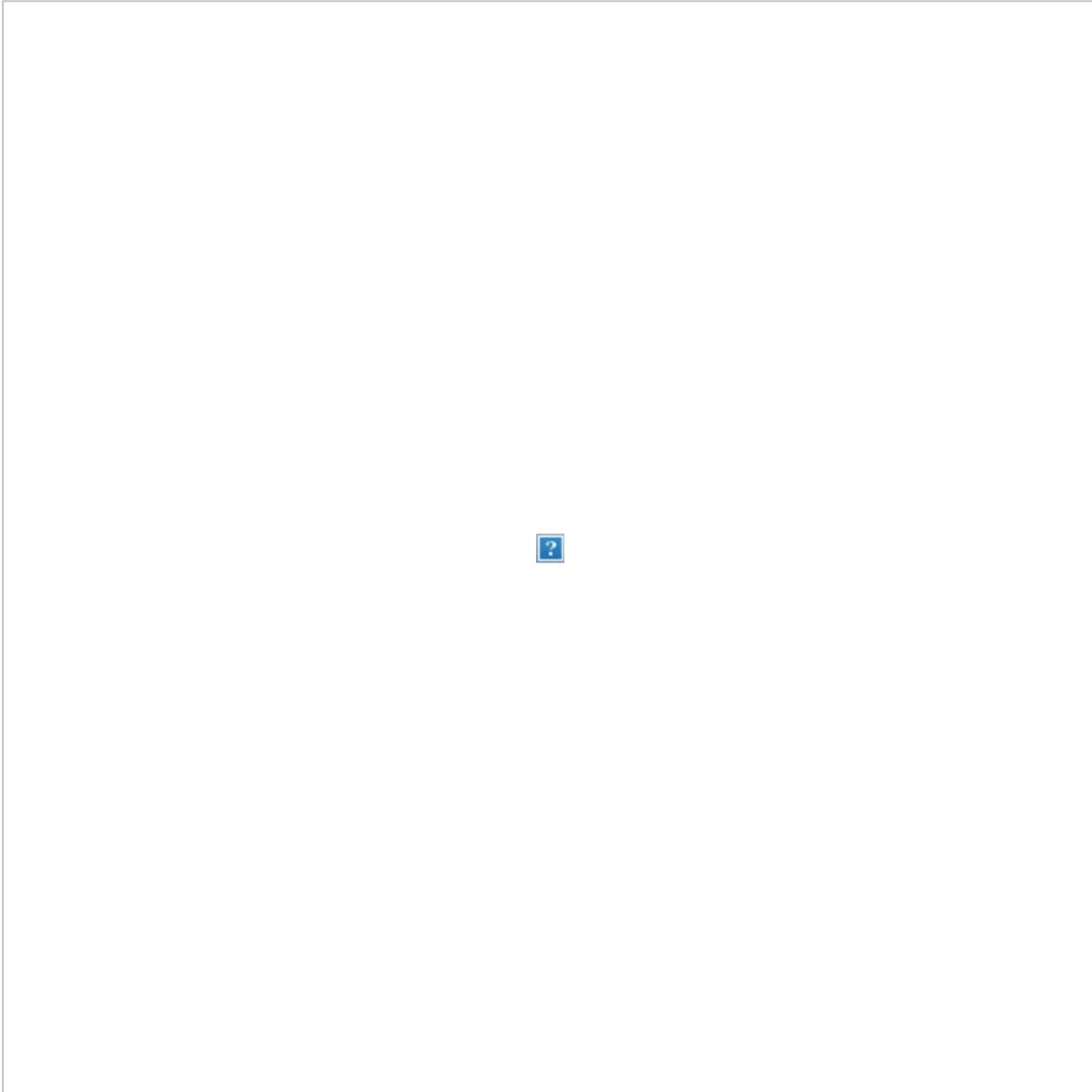


From: [The OX Factor](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: \$42B BEAD Program Hits The Ice
Date: Thursday, February 6, 2025 7:47:17 AM

You don't often get email from the-x-edge@mail.beehiiv.com. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

February 06, 2025 | [Read Online](#)



Hi, Tim here!

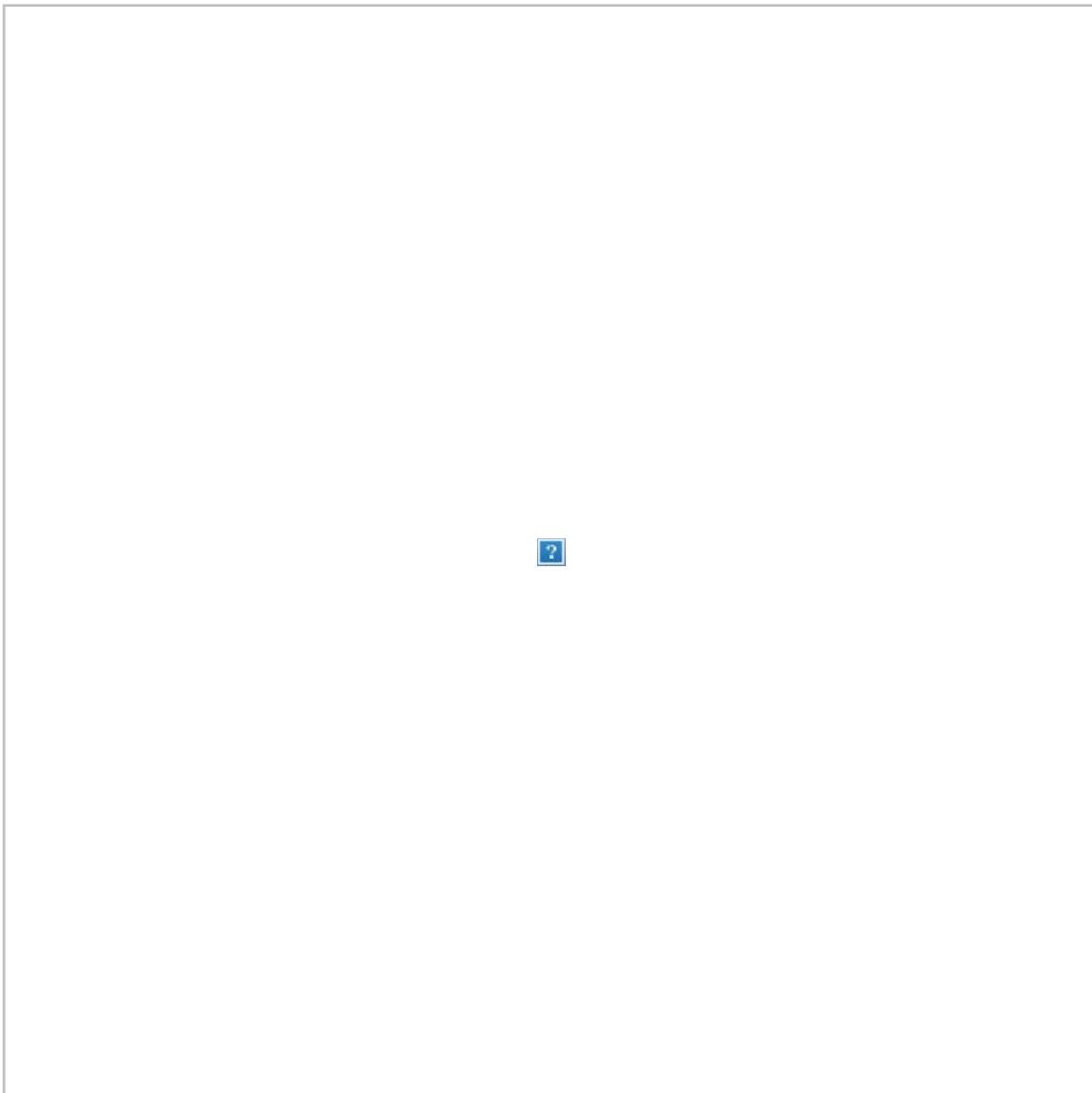
Two major shifts in broadband policy have changed the landscape for 2025: The \$42.45 billion

BEAD program is frozen, and AT&T just pulled out of New York over mandated affordable plans.

The takeaway? 2025 broadband expansion faces serious hurdles—but providers that pivot to alternative funding and creative market solutions will come out ahead.

Let's dive into what this means for the industry.

What's the Big Story?



BEAD Was Supposed to Close the Digital Divide. Now It's in Limbo.

The Broadband Equity, Access, and Deployment (BEAD) program represented the single biggest broadband investment in U.S. history—until last week. A new executive order has frozen federal infrastructure funds—including the \$42.45 billion allocated for BEAD—throwing the industry into sudden uncertainty.

The timing couldn't be worse. States had just received their allocations and were finalizing detailed plans. Construction firms were mobilizing resources. ISPs were mapping deployment strategies. Now everything hangs in the balance.

Why This Matters

The freeze creates cascading effects throughout the industry:

- ISPs and construction firms that invested in preparation now face costly delays.
- State agencies must navigate a complex choice: proceed with projects and risk funding disappearing, or pause everything and potentially lose construction seasons.
- Small and mid-sized ISPs that budgeted around BEAD funding could face serious financial pressure.
- Rural and underserved communities waiting for better connectivity face indefinite delays.

The uncertainty doesn't just affect providers—it disrupts entire deployment strategies.

What Happens Next?

Short-term prospects are uncertain:

- The NTIA (which oversees BEAD) is pushing for an exception, but there's no guarantee of success.
- State broadband offices are scrambling to develop contingency plans.
- Industry associations are mobilizing to lobby for a quick resolution.

Long-term, this could become entangled in election-year politics, potentially delaying funding well into 2025. For companies that were counting on BEAD to fuel growth, waiting isn't a

viable strategy.

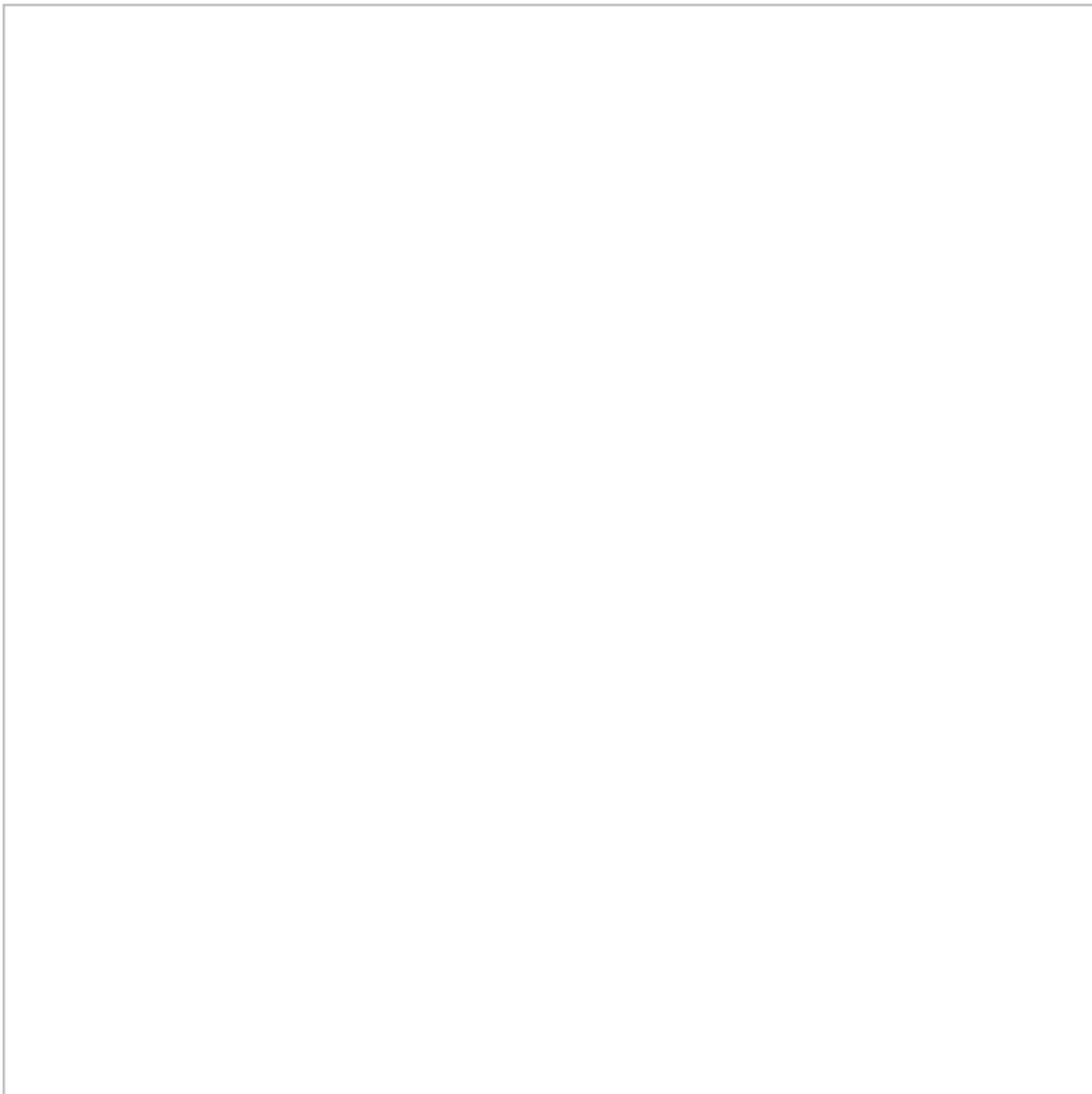
What's Plan B?

Instead of waiting for Washington to sort itself out, the best strategy is to diversify revenue streams, strengthen private-sector partnerships, and secure alternative funding sources.

Here's where smart providers are finding opportunities:

- State & private funding remains active: Many states still have substantial broadband grants in motion, and private-sector investment in underserved areas is growing
- Utility & defense markets offer new opportunities: Grid modernization, EV charging infrastructure, and military network upgrades are creating steady demand
- Regional focus can pay off: Smaller ISPs and enterprises still need network expansion, private fiber, and last-mile solutions
- Public-private partnerships are gaining traction: With BEAD on hold, many local governments are taking matters into their own hands—seeking direct partnerships with ISPs to keep projects alive. This shift opens the door for creative funding models that don't rely solely on federal grants.

Top News Lately



BT Nears Sale of Irish Operations BT is finalizing the sale of its Irish wholesale and fiber assets to Cordiant Digital Infrastructure, potentially creating Ireland's largest open-access fiber network.

Vodafone Enables Mobile Calls via Satellite Successful testing of direct-to-satellite mobile calls opens new possibilities for remote area coverage without specialized equipment.

Comcast Loses 139,000 Broadband Subscribers Despite strong revenue from streaming and studio segments, Comcast faces steeper-than-expected broadband subscriber losses.

Can Broadband Be Affordable If Providers Pull Out?

In our last issue, we covered New York's Affordable Broadband Act, which mandated low-cost internet plans to expand access. Now we're seeing the first major pushback: AT&T has pulled its 5G Internet Air service from New York entirely, calling the state's price caps unsustainable.

Under the law, ISPs with over 20,000 customers must offer \$15/month for 25Mbps and \$20/month for 200Mbps. AT&T says those rates don't work financially—so instead of complying, they left the market.

This isn't just a New York issue—other states considering similar laws will be watching this closely.

What This Means for Broadband Policy:

This development raises crucial questions about broadband policy:

- Affordability mandates could backfire if major providers exit markets rather than operate under tight margins.
- Other states watching New York's experience may need to rethink their approach to price regulation.
- The industry needs new models that balance accessibility with provider sustainability.

The Bottom Line

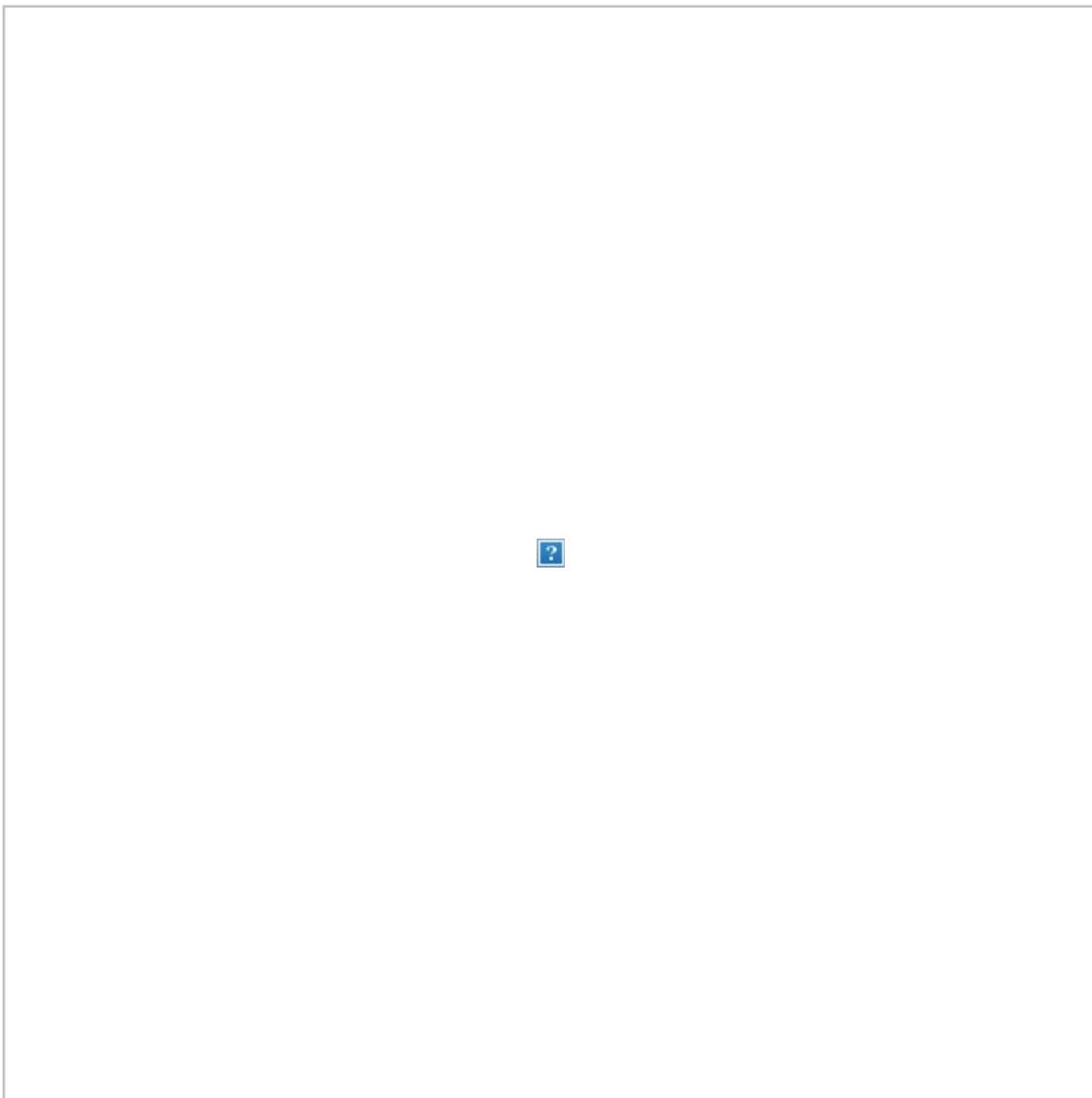
Whether it's federal funding freezes or state-level price controls, 2025's challenges demand a new playbook. The providers who will thrive aren't just waiting for perfect conditions—they're building resilient business models that can adapt to whatever comes next.

What's New With Us?

I'll be speaking at FISPA Live 2025 on Feb. 19, joining Chad Johnston (Hexatronic) for the panel "Your Construction Toolbox: Driving Innovation and Efficiency."

If you'll be in New Orleans, don't miss it—should be a great discussion.

Hope to see you there!



Got a topic you'd like us to dive into? Just reply to this email—we read every message!
Otherwise, we'll see you in the next edition.

Update your email preferences or unsubscribe [here](#)

© 2025 The OX Factor

228 Park Ave S, #29976, New York, New York 10003, United States

 Powered by beehiiv

From: [Robbins, Kaycee](#)
To: [Monsarrat, Alexei](#); [Hallquist, Christine](#); [Fish, Robert](#); [Clithero, Toni H](#); [Matthews, Alissa](#); [Sweet, Kristina \(she/her\)](#); [Raboin, Ginny](#); [Fortier, Lucie](#); [Aguayo, Jose](#)
Cc: [Wade, Jen](#); [Reyes, Jill](#); [Brouwer, Meagan](#)
Subject: 1.21.25 VCBB / RSM Weekly BEAD Touch Base Meeting Notes and Action Items
Date: Thursday, January 23, 2025 10:21:42 AM
Attachments: [image001.png](#)
[1.22.25 VCBB - Subrecipient Guidance Workshop.pdf](#)

You don't often get email from kaycee.orourke@rsmus.com. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hi VCBB,

Below are the notes following the VCBB / RSM touch base on Tuesday, January 21 and NTIA meeting on Wednesday, January 22:

Action Items

- VCBB to review FAQ and Definitions documents
- RSM to finalize the FirstNet Regional PEIS analysis
- VCBB to review the Final Proposal Compliance Checklist and inform RSM of any automation and permission requests
- RSM to continue development of the local coordination plan
- RSM to continue development of the memo on the applicability of 2 CFR 200 for fixed amount subawards

Meeting Notes:

- **Pre-Proposal Portal:** The pre-proposal portal closed on January 9, 2025
 - VCBB is currently reviewing the submitted requests and making decisions accordingly
 - Pre-proposal review is scheduled for Friday, January 24 at 1:00 PM EST
 - VCBB to provide a pre-proposal summary when review is completed
- **FAQ and Definitions Document**
 - RSM sent VCBB the updated FAQ and Definitions document on 1/17/25
 - VCBB is in progress of reviewing the FAQ and Definitions documents
 - [Here](#) is the current annotated version of what is posted to the web
 - [Here](#) is the definitions document
- **Permitting Plan / FirstNet Regional PEIS Analysis**
 - RSM sent the draft [Permitting Plan](#) to VCBB on January 10, 2025
 - VCBB had an internal meeting on 1/21/25 and will be providing additional comments to the document
 - VCBB and RSM are meeting on Friday, January 24 at 3:00 PM EST to discuss further
 - The draft PEIS analysis is expected by January 28, 2025
- **Final Proposal Compliance Checklist**
 - RSM sent the [Compliance Checklist](#) on Smartsheet to VCBB on 1/22/25
 - VCBB to review and inform RSM of any automation and permissions requests
- **EHCT**
 - VCBB and RSM are meeting on Thursday, January 23 at 11:30 AM EST to discuss further
- **Executive Order**
 - In [this memo](#), the White House clarified that the recent executive order pausing certain

funding under the Inflation Reduction and Infrastructure Acts applies exclusively to energy-related projects, not affecting the \$42.5 billion allocated to the BEAD program

- **Workshop Scheduling**

- Completed Trainings

- Technical Webinar Session 1: Thursday, January 9: 3:00 – 4:30 PM EST
 - Topics include NEPA/EHP, BABA, Davis Bacon/Labor/Workforce
- Office Hours 1: Tuesday, January 21: 10:00 – 11:30 AM EST
- Technical Webinar Session 2: Wednesday, January 22: 12:00 – 1:30 PM EST
 - Topics include Fixed Amount Subaward, Match, and Cyber Security
 - Attached is the presentation slide deck, which can also be found [here](#)

- Upcoming Trainings

- Office Hours 2: Friday, January 24: 11:00 AM – 12:30 PM EST

- **Other Items in Progress**

- Local Coordination Plan: RSM is developing a local coordination plan to catalogue outreach activities
- Draft Subrecipient Agreement: VCBB is aiming to publicly post a draft Subrecipient Agreement by the end of February
- Semiannual Report: VCBB is in progress of developing the Semiannual Report
- Fixed Amount Subaward Memo: RSM is in progress of developing a memo on the applicability of 2 CFR 200

Please let us know if you have any questions or comments.

Thank You,

Kaycee Robbins, CISA
Supervisor, Risk Consulting

RSM US LLP

A contractor for the Governor's Office of Planning and Budget

W: 404-751-9262 **E:** kaycee.orourke@rsmus.com | **W:** www.rsmus.com



NOTICE: This e-mail is only intended for the person(s) to whom it is addressed and may contain confidential information. Unless stated to the contrary, any opinions or comments are personal to the writer and do not represent the official view of RSM US LLP or any of its affiliates (RSM US). If you have received this e-mail in error, please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

Any advice or information in the body of this email is subject to, and limited by, the terms in the applicable engagement letter or statement of work, including provisions regarding tax advice. RSM US is not responsible for, and no person should rely upon, any advice or information in the body of this email unless such advice or information relates to services contemplated by an engagement letter or statement of work in effect between such person and RSM US.

Vermont Community Broadband Board

BEAD Technical Requirements Overview

Cybersecurity and Supply Chain Risk Management,
Matching Funds, Payment Structure

Wednesday, January 22, 2025

Agenda

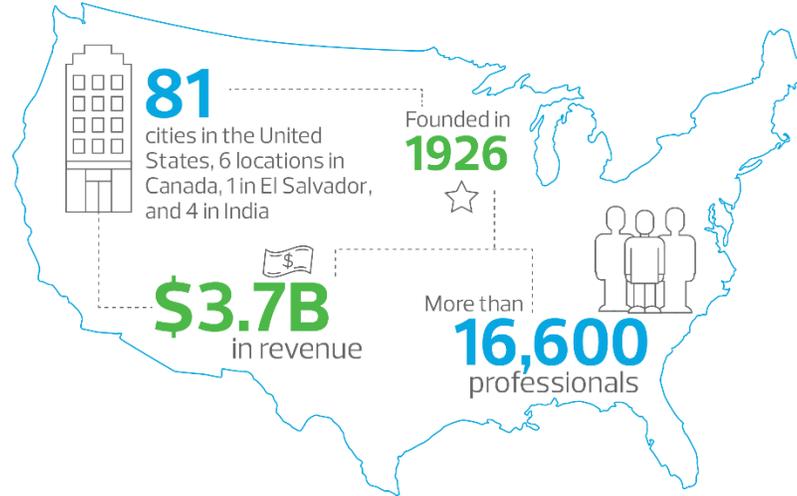
01	Payment Structure / Fixed Amount Subawards	4
02	Matching Funds	8
03	Cybersecurity and Supply Chain Risk Management	19

RSM US overview

About RSM

As the **5th largest firm** in the U.S., with over **16,000 professionals** in **81 cities** in the U.S. and six locations in Canada, we deliver audit, tax and consulting services to our clients. As we prepare to celebrate our **100th anniversary in 2026**, we have evolved our strategy to solidify our leadership as the first-choice advisor to middle market leaders globally.

Our approach to client service is rooted in deep industry knowledge and technical acumen. Our first-choice advisors do not just provide services, they bring diverse perspectives, innovative ideas, and data-driven insights to our clients.



With you today



Jen Wade
Director, Risk Consulting



Vince Masson
Senior Director, Risk Consulting

RSM's Role

RSM will assist the VCBB by supporting all eligible VT-BEAD applicants with technical and regulatory support services addressing all aspects of the VT-BEAD Full Proposals

Subrecipient Selection
Process Assistance

Program Monitoring and
Technical Assistance

Fixed Amount Subaward

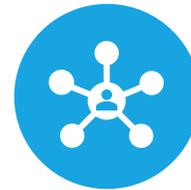
What is a Fixed Amount Subaward?

A fixed amount subaward is a type of subgrant agreement where payments are based on meeting specific requirements of the federal award (e.g., performance and results), rather than actual costs incurred.



Broadband Infrastructure Deployment

Fixed amount subawards are only allowed for subgrants in which the major purpose of the project is broadband infrastructure deployment.



Milestones Reached

A fixed amount subaward is a type of subgrant agreement where payments are based on meeting specific requirements of the federal award (e.g., performance and results), rather than actual costs incurred.

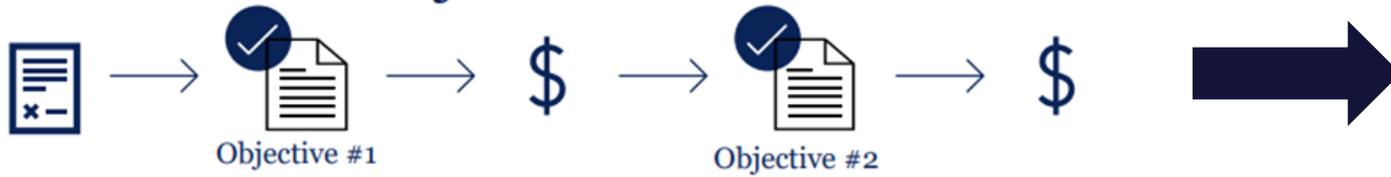


Match Requirements

Match requirements must still be met.

Types of Fixed Amount Subawards

Objective Met



Subrecipient receives several partial payments upon completion of milestones. The milestones and amount of each payment are agreed upon in advance and set forth in the subaward. Objectives can be either tangible or abstract. VCBB intends to use this type of structure.

Units Built



Subrecipient receives payment for a defined unit or units at a defined price as identified in the subaward agreement. The units and unit prices are agreed upon in advance and set forth in the subaward.

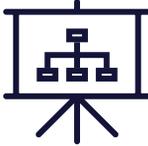
Total Project



Subrecipient receives a single payment upon completion of the project, following verification by the VCBB.

More Flexible Requirements

When using a fixed amount subaward, several requirements in 2 CFR 200 do not apply, as described below:

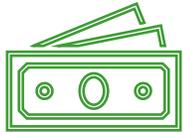
<h3>Cost Principles</h3> 	<h3>Procurement</h3> 	<h3>Property Standards</h3> 
<p>The Uniform Guidance establishes principles for VCBB to use when determining allowable costs for Subrecipients. Cost principles or other pricing information are used as a guide when budgeting for the work that will be performed under the fixed amount subaward.</p> <p>Subrecipients that receive a fixed amount subaward are not required to comply with the cost principles requirements of the Uniform Guidance.</p>	<p>The Uniform Guidance generally imposes procurement rules on VCBB and Subrecipients to ensure that procurement processes sufficiently guard against fraud, waste, and abuse.</p> <p>Subrecipients that receive a fixed amount subaward are not required to comply with the procurement practices of the Uniform Guidance.</p>	<p>The Uniform Guidance generally imposes property standards to hold VCBB accountable on their investment to deliver for the American people.</p> <p>Subrecipients that receive a fixed amount subaward have more flexible property standard options.</p>

Note: Requirements are subject to change with updated program guidance.

Payment Structure



VCBB intends to utilize fixed amount subawards to reduce the program’s administrative costs and promote broad participation in the VT-BEAD program. VCBB may award subawards on a cost reimbursement basis if specific cases warrant this type of agreement. Subrecipients under this fixed amount subaward are not required to comply with the cost principles under the Uniform Guidance pursuant to NTIA’s policy update. In accordance with NTIA guidelines, VCBB will utilize a performance-based reimbursement method of payment in which payments will be made as Subrecipients meet project milestones and objectives.



The following will be required of Subrecipients before any disbursement of BEAD funds:

- **Reaching project milestones:** The VCBB will require the timely reporting of the completion of project milestones.
- **Monitoring:** As required by the BEAD Program, VCBB will monitor award activities for common fraud activities, including but not limited to:
 - False claims for materials and labor;
 - Bribes related to the acquisition of materials and labor;
 - Product substitution;
 - Mismatching or mislabeling on products and materials; and
 - Time and materials overcharging.



Questions

Section III.B Match Requirements Summary

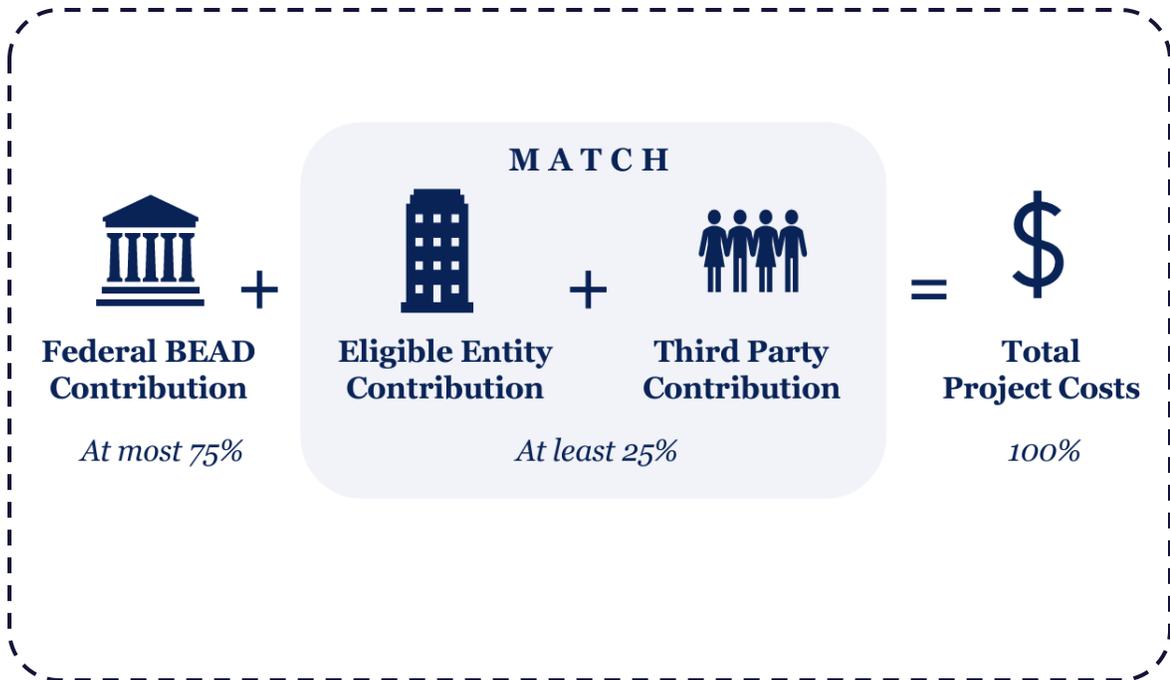
Prospective Subrecipients should actively seek external funding sources to cover project costs, as matching contributions can enhance commitment and extend the reach of BEAD program funding for reliable internet access for all

Overview	Rationale	Roles & Responsibilities	Description	Questions
<p>01</p> <p>Section III.B of the NTIA BEAD NOFO covers the Cost Sharing and Match requirements for applicants</p>	<p>02</p> <p>To ensure Prospective Subrecipients are aware of and comply with all match requirements</p>	<p>03</p> <p>Prospective Subrecipient: Demonstrate an understanding of and compliance with match requirements</p> <p>VCBB: Evaluate applications</p>	<p>04</p> <p>The BEAD NOFO and NTIA guidance requires applicants comply with match requirements</p>	<p>05</p> <p>Contact: vcbb.bead@vermont.gov</p> <p>Additional Resources: Broadband Equity, Access, and Deployment Program Department of Public Service (vermont.gov)</p>

Matching Funds

What are matching funds?

Also known as cost share, is the portion of a project’s cost not paid by federal funds. The BEAD Program requires a minimum 25% match for deployment projects, exclusive of “high-cost areas.” Any funds provided as match for deployment projects must stay with the project and cannot be allocated to other program activities.



Should the Prospective Subrecipient determine that there are locations within the project area that warrant consideration of a waiver of the 25 percent matching requirement for the project area, the Prospective Subrecipient is encouraged to:

- Submit its proposal and outline the reasons for its determination
- Request as part of the proposal a project waiver of the 25 percent match requirement
- The waiver request is subject to approval by the NTIA and will be tailored to those project areas where a waiver has been deemed necessary

Matching Funds

Who can provide match?

Match can be provided from the following sources, or a combination of the following sources:

- 1 The Subrecipient
- 2 Philanthropic or Non-profit Organization
- 3 Unit Of Local Government
- 4 Utility Company
- 5 The Eligible Entity
- 6 Federal Regional Commission Or Authority
- 7 For-profit Company Regional Planning / Government Organization Cooperative

In-Kind Matches

What is an in-kind match?

In-kind contributions are non-cash donations of property, goods or services, which benefit a federally assisted project, and which may count toward satisfying the non-federal matching requirement of a project's total budgeted costs when such contributions meet certain criteria

In-Kind Match Applicability

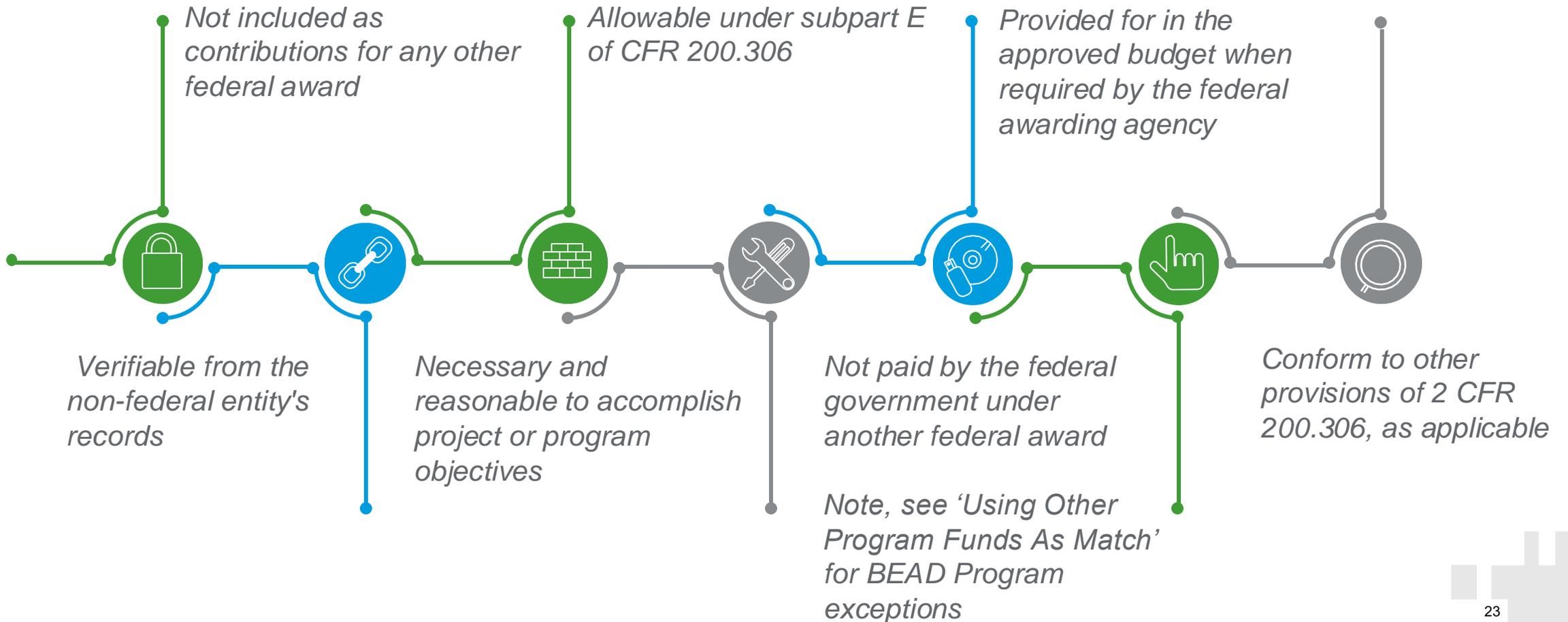
NTIA encourages Prospective Subrecipients to thoroughly consider potential sources of in-kind contributions that, depending on the particular property or service and the applicable federal cost principles, could include the following:

- 1 Employee or volunteer services
- 2 Equipment
- 3 Supplies
- 4 Indirect costs
- 5 Computer hardware and software
- 6 Use of facilities
- 7 Waiver of fees associated with access to rights of way, pole attachments, conduits, easements, or access to other types of infrastructure

Matching Funds

What criteria must the match meet?

All matches must meet the following criteria:



Using Other Program Funds As Match

Funds from other federal programs (including funds from the FCC’s Universal Service Fund programs) generally may not be used as matching funds, but the IIJA allows a few exceptions and corresponding requirements.

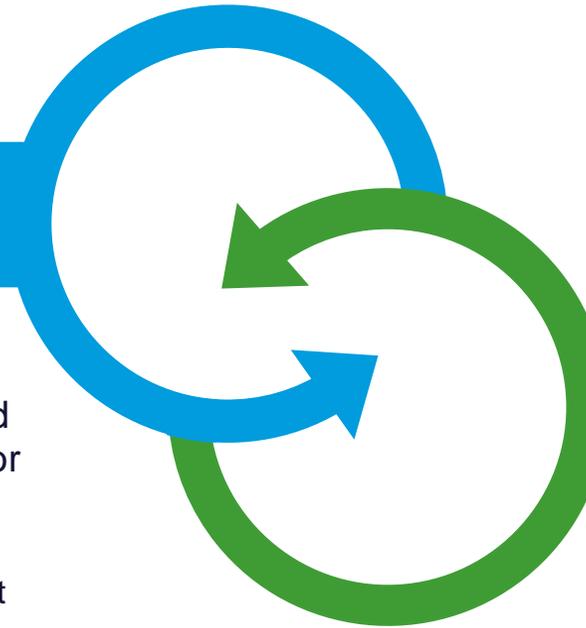
Eligible Sources of Match

Matching funds for the BEAD Program may come from a federal regional commission or authority or from funds, to the extent permitted by law, that were provided to a Subrecipient for the purpose of deploying broadband service under:

- The Families First Coronavirus Response Act of 2020
- The Coronavirus Aid, Relief, and Economic Secure (CARES) Act of 2020
- The Consolidated Appropriations Act, 2021
- The American Rescue Plan Act of 2021
- Loan funding issued through a federal agency, such as through the USDA ReConnect Program

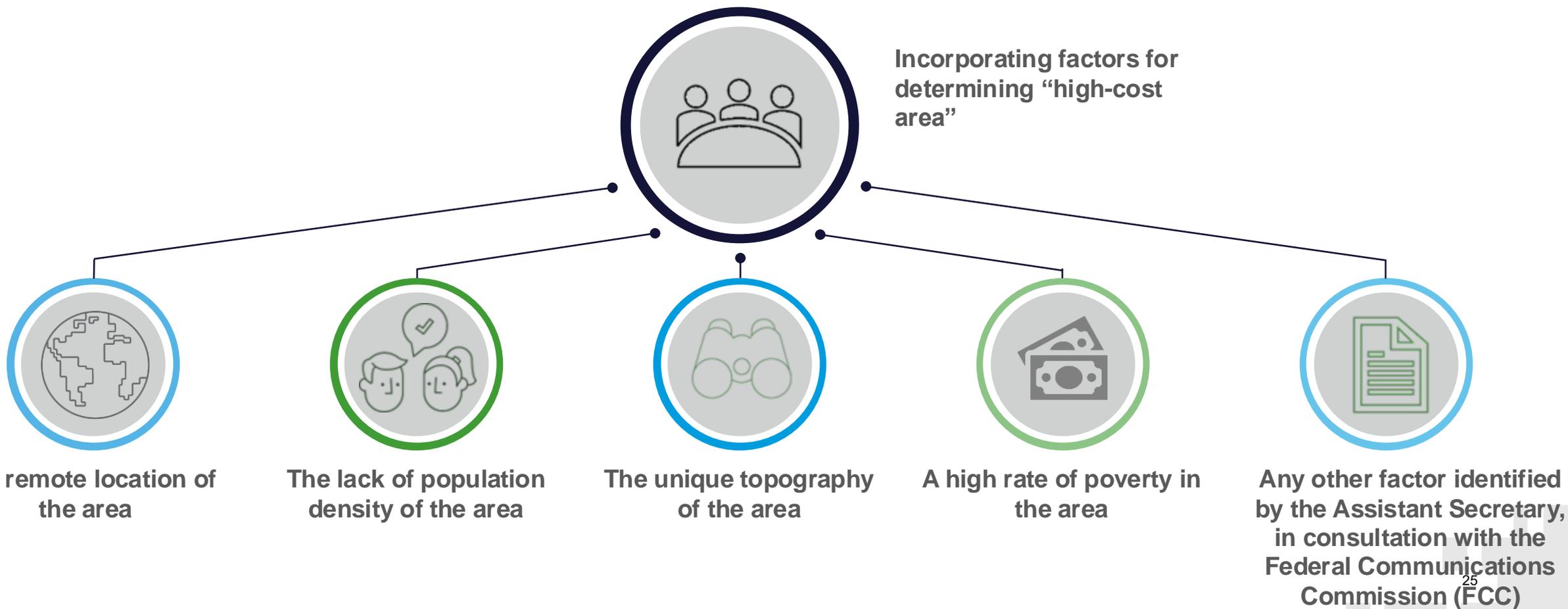
Requirements

If funds are utilized from the eligible sources of match, the project will need to comply with all BEAD programmatic requirements and any requirements imposed by the federal regional commission and/or relevant Treasury program as applicable.



High-Cost Areas

Match is **not required** for areas that are considered “high-cost areas.” A high-cost area is an unserved area in which the cost of building out broadband service is higher, compared to the average cost of building out broadband service in unserved areas in the United States (as determined by the Assistant Secretary, in consultation with the Federal Communications Commission).



How To Verify Match?

Requirement	Activities
 <p>All Match</p>	<ul style="list-style-type: none"> • Ensure records include the source, amount, quantity, time, and delivery of each match service • Retain records through the life of the grant and grant closeout • Ensure match submission requires a legally binding attestation • Consider Letters of Commitment for match and then compare actual match against stated commitments
 <p>Cash Match</p>	<ul style="list-style-type: none"> • Request bank or financial statements, showing available and expended funding • Require receipts from disbursements
 <p>In-Kind Match</p>	<ul style="list-style-type: none"> • For volunteer services where the rate must not exceed fair market value, use federal tools such as the Bureau of Labor Statistics to determine wage rate information. To the extent feasible, require similar methods to record time as an organization would for paid labor, such as timesheets and timecards • For reduced rates from consultants and other individuals, consider comparing current charges against standard or set labor category rates • For facility in-kind match verify amount against current mortgage statements or rental rates

Roadmap for Prospective Subrecipients

Milestone	Phase
Prospective Subrecipient should upload certification verifying that the entity will have sufficient financial resources to cover your eligible costs for the project until such time(s) as the VCBB authorizes disbursement (documentation can include BEAD matching funds)	Full-Proposal
Prospective Subrecipient to provide details of total amount of matching funds that are committed for this project	Full-Proposal
Prospective Subrecipients to identify if they will be seeking a match waiver due to their total match funds being less than the 25% requirement and provide justification	Full-Proposal
Prospective Subrecipient to provide source of matching funds along with the dollar amount already secured for each tranche, supporting documentation, and source of matching funds not secured with narrative. Additionally, the applicant will provide a narrative explaining if the entity is pursuing any additional financial support for this project.	Full-Proposal
Prospective Subrecipient must provide documentation verifying pledged matching funds prior to commencement of work and release of any payments	Award

Section III.B Match Requirements Breakdown

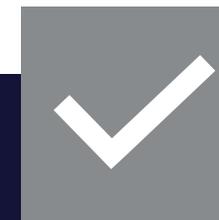
Compliance with Match Requirements: The Vermont Community Broadband Board is committed to ensuring that Prospective Subrecipients understand and are in compliance with BEAD match requirements. As outlined in NTIA's BEAD NOFO, except in certain specific circumstances, BEAD Subrecipients are required to have matching funds of not less than 25 percent of project costs



- The VCBB will require Prospective Subrecipients to provide a **breakdown of costs within their application** to include total project costs and match funds
- The VCBB urges Prospective Subrecipients to consider the costs to deploy broadband to all unserved and underserved locations within the project area, but also to undertake a granular analysis that provides the Prospective Subrecipient a firm understanding of the cost of each such location



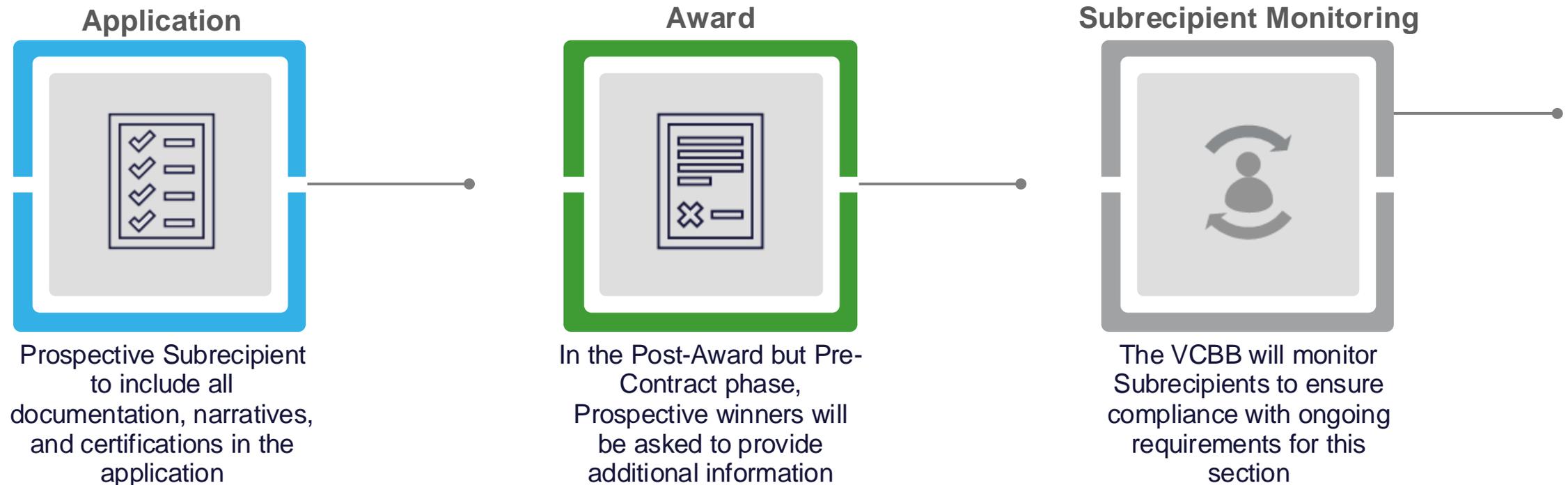
- Should a Prospective Subrecipient determine that there are locations within the project area that warrant consideration of a waiver of the **25 percent matching requirement** for the project area, the Prospective Subrecipient is encouraged to submit its proposal, outline the reasons for its determination, and request that a project area waiver of this requirement be granted
- Such a waiver request is subject to approval by the NTIA and will be narrowly tailored to those project areas where a waiver is deemed necessary



- Certify that the Prospective Subrecipient has included all necessary information required by the VCBB and/or NTIA

Next Steps

The Prospective Subrecipient is expected to complete the following task(s) to satisfy the match requirements which are laid out on Page 20 – 22 **BEAD NOFO** and adopted by the Vermont Community Broadband Board on Pages 41 – 42 of their **Initial Proposal Volume 2**



Questions

Section IV.C.2.c.vi Cybersecurity and Supply Chain Risk Management Summary

Cybersecurity and Supply Chain Risk Management practices emphasize the need to protect communications networks from threats while allowing flexibility for entities to propose additional safety measures.

<p>01</p> <p>Section IV.C.2.c.vi of the BEAD Notice of Funding Opportunity (NOFO) requires both:</p> <ul style="list-style-type: none"> • Cybersecurity risk management and; • Supply chain risk management practices (SCRM) <p>These must be operationalized or be ready to be implemented prior to any fund allocations being awarded to a Subrecipient</p>	<p>02</p> <p>To ensure Prospective Subrecipients identify and manage their cybersecurity and third-party risks</p>	<p>03</p> <p>Prospective Subrecipient: Demonstrate and certify understanding and compliance</p> <p>VCBB: Evaluate applications</p>	<p>04</p> <p>Prospective Subrecipients should submit these Plans to the Vermont Community Broadband Board prior to the allocation of funds. The VCBB must provide the plans to NTIA upon NTIA's request.</p>	<p>05</p> <p>Contact: vcbb.bead@vermont.gov</p> <p>Additional Resources: Broadband Equity, Access, and Deployment Program Department of Public Service (vermont.gov)</p>
<p>Overview</p>	<p>Rationale</p>	<p>Roles & Responsibilities</p>	<p>Description</p>	<p>Questions</p>

Roadmap for Prospective Subrecipients

Milestone	Phase
Prospective Subrecipient to prepare a Cybersecurity Risk Management plan AND Supply Chain Risk Management plan	Pre-application
Applicant to submit Cybersecurity Risk Management plan and C-SCRM plan to the VCBB	Application
The VCBB to submit Cybersecurity Risk Management Plan and C-SCRM Plan to NTIA	Upon Request

Section IV.C.2.c.vi Cybersecurity and Supply Chain Risk Management Breakdown

Compliance with applicable Cybersecurity and Supply Chain Risk Management: The BEAD NOFO directs the Assistant Secretary to specify prudent cybersecurity and supply-chain risk management practices for Subrecipients deploying or upgrading broadband networks using BEAD funds



Each Prospective Subrecipient must maintain, operationalize, and submit to the Eligible Entity the following plans:

1. A Cybersecurity Risk Management Plan and
2. A Cyber Supply Chain Risk Management (C-SCRM) plan



Both plans must be:

- Operational or ready to be operationalized
- Re-evaluated at defined intervals and as events warrant
- Submitted to the Vermont Community Broadband Board for review

Section IV.C.2.c.vi Cybersecurity and Supply Chain Risk Management Breakdown

Cybersecurity Risk Management Plan

Prospective Subrecipients must prepare a cybersecurity risk management plan and have the plan in place **prior to award of the grant** if the Subrecipient is providing service to the area already; or the Prospective Subrecipient must demonstrate that **it is ready to be operationalized upon providing service** if it is not yet providing service prior to the grant award. The plan:

- Must reflect the latest version of the National Institute of Standards and Technology Framework for Improving Critical Infrastructure Cybersecurity ([NIST CSF v2.0](#)) and the standards and controls set forth in [Executive Order 14028](#) and specifies the security and privacy controls being implemented
- Be submitted to the VCBB prior to the allocation of funds
- If the Subrecipient makes any substantive changes to the plan, a new version will be submitted within 30 days

Cyber Supply Chain Risk Management Plan

Must be in place **prior to award of the grant** if the Subrecipient is providing service to the area already; or the Prospective Subrecipient must demonstrate **that it is ready to be operationalized upon providing service**. Supply Chain Risk Management plans must meet the following requirements:

- Be based on key practices discussed in NISTIR 8276 "[Key Practices in Cyber Supply Chain Risk Management: Observations from Industry](#)"
- Be based on related SCRM guidance from NIST 800-161 "[Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations](#)"
- Specify the controls to be implemented

Document Overview

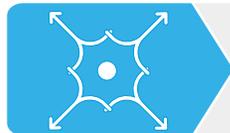
A template for the Cybersecurity Risk Management Plan and the Cyber Supply Chain Risk Management Plan will be provided by VCBB, they are optional if you already have existing documentation, including:



A section that describe the purpose and scope. If there are any carveouts or exceptions, these are clearly documented along with reasoning



Align the Cybersecurity Risk Management and the Supply Chain Risk Management strategies with the organization's mission, business objectives, enterprise risk management and overall governance strategies



Lists contact information for the owner of Cybersecurity Risk Management and the supply chain risk management



Contain roles and responsibilities, which are clearly outlined for operation and management. Roles are not required to be named and can be positions



State which components are operational



If the plans are not yet fully operational, the plan assigns ownership for who is responsible for operationalizing the plan and specifies the timeline for when all components of the plan are expected to be operational



Contains or references an exception management process



Contain or references how this effort will be governed by the organization. This can also include other associated policies, standards, procedures, or guidelines that empower the plan or are used to provide further granularity to the processes

Next Steps

The Prospective Subrecipient is expected to complete the following task(s) to satisfy the requirements for Section IV.C.2.c.vi which are laid out on Pages 70-71 of BEAD NOFO and adopted by the VCBB on Pages 101-102 of Initial Proposal Volume 2



Additional resources

For additional information on the contents of the Cybersecurity and Supply Chain Risk Management Plan, please refer to the NOFO and NIST guidelines. These resources provide specific requirements and detailed guidance on implementation, monitoring, and compliance standards.

Questions

THE POWER OF BEING UNDERSTOOD

ASSURANCE | TAX | CONSULTING

This document contains general information, may be based on authorities that are subject to change, and is not a substitute for professional advice or services. This document does not constitute assurance, tax, consulting, business, financial, investment, legal or other professional advice, and you should consult a qualified professional advisor before taking any action based on the information herein. RSM US LLP, its affiliates and related entities are not responsible for any loss resulting from or relating to reliance on this document by any person. Internal Revenue Service rules require us to inform you that this communication may be deemed a solicitation to provide tax services. This communication is being sent to individuals who have subscribed to receive it or who we believe would have an interest in the topics discussed.

RSM US LLP is a limited liability partnership and the U.S. member firm of RSM International, a global network of independent assurance, tax and consulting firms. The member firms of RSM International collaborate to provide services to global clients, but are separate and distinct legal entities that cannot obligate each other. Each member firm is responsible only for its own acts and omissions, and not those of any other party. Visit [rsmus.com/aboutus](https://www.rsmus.com/aboutus) for more information regarding RSM US LLP and RSM International.

RSM, the RSM logo and *the power of being understood* are registered trademarks of RSM International Association.

© 2025 RSM US LLP. All Rights Reserved.

From: [Robbins, Kaycee](#)
To: [Monsarrat, Alexei](#); [Hallquist, Christine](#); [Fish, Robert](#); [Clithero, Toni H](#); [Matthews, Alissa](#); [Sweet, Kristina \(she/her\)](#); [Raboin, Ginny](#); [Fortier, Lucie](#); [Aguayo, Jose](#)
Cc: [Wade, Jen](#); [Reyes, Jill](#); [Bender, Maggie](#); [Brouwer, Meagan](#)
Subject: 1.28.25 VCBB / RSM Weekly BEAD Touch Base Meeting Notes and Action Items
Date: Thursday, January 30, 2025 5:19:19 PM
Attachments: [image001.png](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hi VCBB,

Below are the notes following the VCBB / RSM touch base on Tuesday, January 28th and NTIA meeting on Wednesday, January 29th:

Action Items

- VCBB to provide RSM with the remaining comments on the permitting plan
- RSM to continue development of the local coordination plan
- RSM to continue development of the memo on the applicability of 2 CFR 200 for Fixed Amount Subawards
- RSM to continue development of the Cyber Checklist and Template
- RSM to discuss the Standardized Rejected Reasons and Application Attestation on the upcoming application methodology review meeting
- RSM to prepare the VCBB invoice

Meeting Notes:

- **Pre-Proposal Portal:** The pre-proposal portal closed on January 9, 2025
 - VCBB is currently reviewing the submitted requests and making decisions accordingly
 - Pre-proposal review sessions were held on 1/24, 1/27 and 1/30
 - VCBB to provide a pre-proposal summary when review is completed
- **FAQ and Definitions Document**
 - RSM and VCBB to discuss the open questions flagged by VCBB on the upcoming call February 4, 2025
 - [Here](#) is the FAQ document
 - [Here](#) is the definitions document
- **Cyber Checklist and Template**
 - RSM is in progress of developing the Cyber Checklist and Template
- **Standardized Rejected Reasons and Application Attestation**
 - RSM sent the VCBB Standardized Rejected Reasons and Application Attestation on 1/27
 - VCBB responded with suggestions, feedback and clarifying questions
 - RSM has reviewed the feedback and will discuss the Application Attestation on the upcoming application methodology review meeting
- **Permitting Plan / FirstNet Regional PEIS Analysis**
 - VCBB and RSM met on 1/28 to discuss the [Permitting Plan](#)
 1. Roles and Responsibilities
 1. The Joint Lead Agency must designate an individual for permitting
 - Jose Aguayo will serve in this role at VCBB
 2. Jose will be the primary point of contact (POC) for Subrecipients at the state level, providing technical support and assistance with guidance from RSM

3. Jose's role in BEAD is focused solely on permitting
 - He will support and maintain relationships with CUDs regarding permitting but will not be involved in the subgrantee selection process

2. State Agency Coordination

1. VCBB continues to meet with other state agencies to identify how other agencies operate
2. These contacts include:
 - Laura V. Trieschmann – State Historic Preservation Officer - (laura.trieschmann@vermont.gov) - VCBB has already met with her
 - They prefer to be contacted via their intake email, which is checked three times a week
 - They have not yet conducted a deep dive on BEAD
 - Melissa Rutter – Utilities (melissa.rutter@vermont.gov) – Met on 1/29 at 4 PM
 - Jeff Ramsey – NEPA, Permitting (jeff.ramsey@vermont.gov) – Met on 1/30 at 4 PM
 - Scott Dillon – Historic Preservation Head of Project Review (scott.dillon@vermont.gov)
 - VTrans Contacts:
 - Lloyd MacCormack – Plans and Titles, GIS, Survey (lloyd.maccormack@vermont.gov)
 - Trey Pok – Documents, Appraisals, Negotiations, Property Management (trey.polk@vermont.gov)
 - Melissa Rutter – Utilities (melissa.rutter@vermont.gov)
 - Jeff Ramsey – NEPA, Permitting (jeff.ramsey@vermont.gov)
 - Chris Slesar – Cultural, Natural Resources (chris.slesar@vermont.gov)

3. Timeline

1. Modifications are scheduled to be posted on February 17, 2025
2. Subgrantee selection period: April 15 – June 6

4. Additional Considerations

1. RSM can perform clash detection between BSLs and historical locations, then provide an impact analysis on potential project areas
 2. A future seminar can be held with RSM and the mapping individuals from the ISPs to communicate the information outlined in the permitting plan
- VCBB to send over the remaining comments on the permitting plan
 - Following the update from VCBB, RSM will address the comments by February 10, 2025
 - RSM is meeting with VCBB on February 12, 2025 at 3:00 PM EST to further discuss the PEIS Analysis
 1. The conditions and overall landscape have not changed significantly since 2017, so the conclusions from the initial assessment remain largely consistent
 2. The process aims to isolate changes since 2017 and assess whether they impact the original conclusions
 - RSM and VCBB are meeting with Jill Springer on February 12, 2025 at 12:30 PM EST

• **Final Proposal Compliance Checklist**

- RSM sent the [Compliance Checklist](#) on Smartsheet to VCBB on 1/22/25
- VCBB to review and inform RSM of any automation and permissions requests

- **EHCT**
 - VCBB and RSM met on 1/23
 - RSM sent VCBB the EHCT materials on 1/27
- **AmpliFund**
 - VCBB and RSM met on 1/29 to discuss gating review and UAT next steps
 1. VCBB sent RSM documents from AmpliFund that contain requirements, logic, inputs, etc
 - Once RSM reviews the AmpliFund documents, RSM and VCBB to meet to discuss:
 - Gating Review – Identifying Showstoppers
 - User Acceptance Testing (UAT) – Developing Test Cases
 - Review each line item in the AmpliFund spreadsheet for gating requirements and UAT
- **Workshop Scheduling:** All scheduled technical webinars and subsequent office hours have been completed
- **Other Items in Progress**
 - Local Coordination Plan: RSM is developing a local coordination plan to catalogue outreach activities
 - Draft Subrecipient Agreement: VCBB is aiming to publicly post a draft Subrecipient Agreement by the end of February
 - Semiannual Report: VCBB is in progress of developing the Semiannual Report
 - Fixed Amount Subaward Memo: RSM is in progress of developing a memo on the applicability of 2 CFR 200 for Fixed Amount Subawards
 - Invoice: RSM is in progress of preparing the VCBB invoice for the time period of 09/25/2024 - 12/31/2024

Please let us know if you have any questions or comments.

Thank You,

Kaycee Robbins, CISA
Supervisor, Risk Consulting

RSM US LLP

A contractor for the Governor's Office of Planning and Budget

W: 404-751-9262 E: kaycee.orourke@rsmus.com | W: www.rsmus.com



NOTICE: This e-mail is only intended for the person(s) to whom it is addressed and may contain confidential information. Unless stated to the contrary, any opinions or comments are personal to the writer and do not represent the official view of RSM US LLP or any of its affiliates (RSM US). If you have received this e-mail in error, please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

Any advice or information in the body of this email is subject to, and limited by, the terms in the applicable engagement letter or statement of work, including provisions regarding tax advice. RSM US is not responsible for, and no person should rely upon, any advice or information in the body of this email unless such advice or information relates to services contemplated by an engagement letter or statement of work in effect between such person and RSM US.

From: [Bender, Maggie](#)
To: [Monsarrat, Alexei](#); [Hallquist, Christine](#); [Fish, Robert](#); [Clithero, Toni H](#); [Matthews, Alissa](#); [Sweet, Kristina \(she/her\)](#); [Raboin, Ginny](#); [Fortier, Lucie](#); [Aguayo, Jose](#)
Cc: [Wade, Jen](#); [Reyes, Jill](#); [Robbins, Kaycee](#)
Subject: 2.10.25 RSM VCBB BEAD Items for Review
Date: Monday, February 10, 2025 5:09:01 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Final portal requirements-01_30_25 -unlocked.xlsx](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hi VCBB,

We hope you enjoyed the weekend! Below is an agenda of topics we would like to discuss during tomorrow's call, along with updates on several items for your review.

2/11 Meeting Agenda:

- Permitting Meeting with Jill Springer Prep
- Programmatic Decision Memo / Documentation Access to Information
 - Pre-proposal data
 - Repository for appendices under decision making documentation
- EHCT Discussion
- AmpliFund Update
 - Sliding scoring discussion
- Updated FAQ
- Application Open Date

Items for the VCBB:

- Local Coordination Plan: The plan can be found [here](#) and was created using NTIA's template
- Standard Language from Past Applications on the Collection of Budget-Line Item Reasonableness:
 - Budgets must be necessary, reasonable, or allocable for the grant project to include but not limited to:
 - Necessary to complete the activities within the grant. See 2 CFR 200.403 ([eCFR :: 2 CFR 200.403 -- Factors affecting allowability of costs.](#))
 - Reasonable is a cost that if in its nature or amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. See 2 CFR 404 ([eCFR :: 2 CFR 200.404 -- Reasonable costs.](#))
 - Allocable means it can be traced to specific activities of a grant project. Costs to the project are in accordance with the benefits received. See 2 CFR 405 ([eCFR :: 2 CFR 200.405 -- Allocable costs.](#))
- Gating Information: Attached is an example portal requirements document

- Cyber Supply Chain and Cybersecurity Resources:
 - [Cyber Supply Chain Risk Management Checklist](#)
 - [Cyber Supply Chain Risk Management Template](#)
 - [Cybersecurity Risk Management Checklist](#)
 - [Cybersecurity Risk Management Template](#)

Please let us know if you have any questions or comments, and we look forward to talking with you tomorrow!

Best,
Maggie Bender

Maggie Bender
Management Consulting
Upcoming OOO: March 7

RSM US LLP

4 Times Square, 151 West 42nd Street, 19th Floor, New York, NY 10036
D: 212.372.1098 | **M:** 630.457.8149 | **E:** maggie.bender@rsmus.com | **W:** www.rsmus.com



NOTICE: This e-mail is only intended for the person(s) to whom it is addressed and may contain confidential information. Unless stated to the contrary, any opinions or comments are personal to the writer and do not represent the official view of RSM US LLP or any of its affiliates (RSM US). If you have received this e-mail in error, please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

Any advice or information in the body of this email is subject to, and limited by, the terms in the applicable engagement letter or statement of work, including provisions regarding tax advice. RSM US is not responsible for, and no person should rely upon, any advice or information in the body of this email unless such advice or information relates to services contemplated by an engagement letter or statement of work in effect between such person and RSM US.

From: [Calix](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: 3 common BEAD funding pitfalls to avoid
Date: Monday, February 3, 2025 2:38:55 PM

You don't often get email from demandgeneration@calix.com. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Don't let small application mistakes sink all your application effort. | [Learn more.](#)

Email not displaying correctly?
[View it in your browser.](#)



Hi Kristina,

How confident are you that your BEAD funding application meets the state requirements? Have you identified pitfalls that might derail a promising application?

Calix and partners, like JSI, work with hundreds of broadband service providers to weave through the complex application maze. Common errors can impede your progress. Read the latest blog post that highlights three common mistakes and three key strategies to avoid them.

[Read more](#)

Let's be friends.



Copyright © Calix | All Rights Reserved
2777 Orchard Pkwy, San Jose, CA 95131

Update your [Email Preferences.](#)
[Unsubscribe](#) from emails.





AmpliFund

Grant Maker Design 2: BEAD App. Review Workflow

VCBB (VT PSD)

1/22/25

Agenda

Goal: Review design edits sent by VCBB and check in on outstanding action items that are needed to move forward.

1. IPP Review
2. Review Design Edits
3. Feedback on Funding Opportunity?
4. Next Steps

IPP Review: Grant Maker Pre-Award

Now

- **Design (workflow):** Document and Design business processes and grants lifecycle activities in AmpliFund
- **Configuration (funding opportunity):** Configure business processes and grants.

Next

- **Testing:** Test processes that were configured in AmpliFund and provide feedback.

Later

- **Training:** Hold end-user training on approved configuration.



Design Edits

YOUR ACTION ITEMS

- Complete Opportunity Details (11/8/24)
- Feedback or approve BEAD Pre-Award Design (12/6/24)
- Provide feedback on BEAD Full Proposal Funding Opportunity (1/3/24)
- Add income to VT BEAD Fund once grants are imported (ON HOLD – waiting on PSD)
- Provide list of Areas (tentatively 2/14/25)

AMPLIFUND ACTION ITEMS

- ~~• Edits to Funding Opp from 12/18/24 session~~
 - ~~= Complete except for re-ordering the budget categories.~~
- Edits to Pre-Award Design (1 week after receiving)
- Edits to the 'BEAD Full Proposal' funding opportunity (1 week after receiving)
- ~~• Create users for RSM~~

Questions?

The logo for AmpliFund, featuring the word "AmpliFund" in a white, sans-serif font. To the right of the text is a green icon consisting of five horizontal bars of increasing height, resembling a bar chart or a signal waveform.

References

User Guides

Fund User Guides

- **Fund Creation**

- [How To View a Fund](#)
- [How To Add a Fund](#)
- [How To Edit a Fund](#)

- **Adding Income**

- [How To Add Received Income](#)
- [How To Edit Income](#)
- [How To Delete Income](#)

- **Fund Management**

- [How To View Fund Sources or Disbursements](#)
- [How To Disable a Fund](#)
- [All Fund Guides](#)

- **Video training series**

- [Fund Foundations: Core Concept: What is a Fund](#)
- [Fund Foundations: Core Concept: How to Create a Fund](#)
- [Fund Foundations: Core Concept: Fund Financials](#)
- [Fund Foundations: Core Concept: Fund Tools](#)

Funding Opportunity

- **Opportunity Options**

- [Opportunity Options: Core Concept: What is an Opportunity?](#)
- [Opportunity Options: Core Concept: How to Create an Opportunity](#)
- [Opportunity Options: Core Concept: Adding Funding to an Opportunity](#)
- [Opportunity Options: Core Concept: Viewing an Opportunity on the Applicant Portal](#)
- [Opportunity Options: Supplemental Video: Opportunity Views](#)

- **Applications**

- [Advancing Applications: Core Concept: Configuring Application Settings](#)
- [Advancing Applications: Core Concept: Application Configuration 1](#)
- [Advancing Applications: Core Concept: Application Configuration 2](#)
- [Advancing Applications: Core Concept: Application Configuration 3](#)
- [Advancing Applications: Core Concept: Testing and Publishing an Application](#)
- [Advancing Applications: Supplemental Video: Budget Template](#)
- [Advancing Applications: Supplemental Video: Performance Plan Template](#)
- [Advancing Applications: Supplemental Video: Performance Plan Goal Types](#)
- [Advancing Applications: Supplemental Video: Quick Tip - Form Build](#)

Customer Support

Access Customer Support



Visit the support portal

<https://amplifund.zendesk.com>

Submit a support ticket

support@amplifund.zendesk.com or in product

Call the help desk

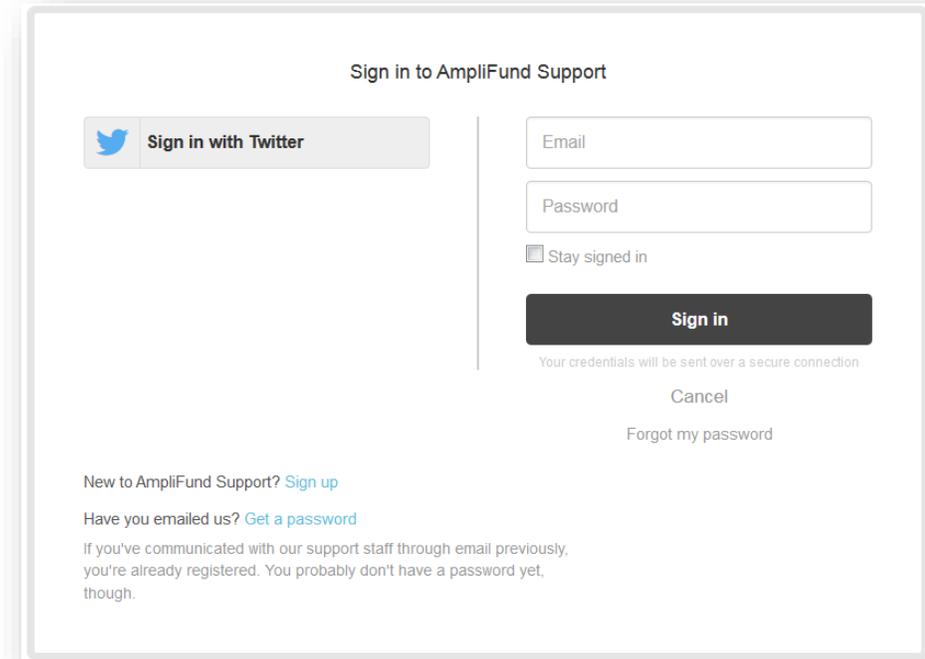
(216)377-5500 ext. 2

Customer Support Hours

8:00am – 8:00pm ET, Monday through Friday, excluding holidays

AmpliFund Support Site

1. Go to <https://amplifund.zendesk.com>
2. Click the **Sign up** link
3. Enter your **full name**
4. Enter your **email address**
5. Complete the **I'm not a robot** check
6. Click the **Sign up** button
7. A welcome email from support@zendesk.com will be sent to you via email
8. Click the link to set your password



Sign in to AmpliFund Support

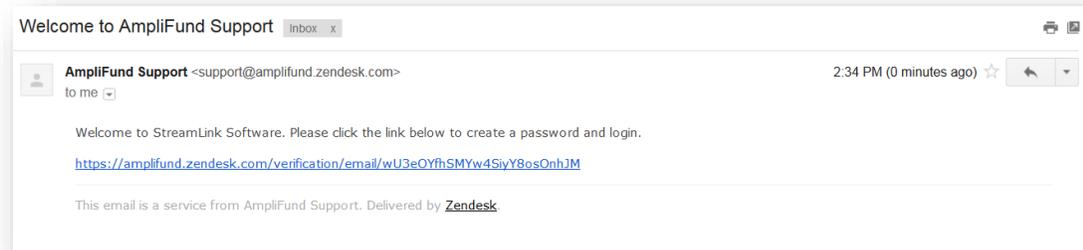
Stay signed in

Your credentials will be sent over a secure connection

New to AmpliFund Support? [Sign up](#)

Have you emailed us? [Get a password](#)

If you've communicated with our support staff through email previously, you're already registered. You probably don't have a password yet, though.



AmpliFund Support Site

AmpliFund

Have a question about AmpliFund? Search our support site.

- Release Notes**
Weekly announcement of enhancements, updates, and fixes in AmpliFund
- User Guides**
AmpliFund User Guides and Quickstart Guides for download
- Instructions**
Step-by-step instructions on using AmpliFund's features
- Upcoming Training and Videos**
Live training events and videos on how to use AmpliFund
- Import Templates**
Excel templates for importing data into AmpliFund
- FAQs**
Frequently Asked Questions about using AmpliFund
- Submit a Ticket**
Still need help? Submit a request to our help desk.



AmpliFund

Grant Maker Configuration 5: BEAD App. Review Workflow

VCBB (VT PSD)

1/29/25

Agenda

Goal: *Provide feedback on BEAD opportunity workflow.*

1. IPP Review
2. Review entire BEAD Workflow
3. Next Steps

IPP Review: Grant Maker Pre-Award

Now

- **Design (workflow):** Document and Design business processes and grants lifecycle activities in AmpliFund
- **Configuration (funding opportunity):** Configure business processes and grants.

Next

- **Testing:** Test processes that were configured in AmpliFund and provide feedback.

Later

- **Training:** Hold end-user training on approved configuration.



In-System Review

BEAD Workflow

Approval (Priority), Rejection (Other Last Mile)

Next Steps

Next meeting: 2/12/25

YOUR ACTION ITEMS

- Complete Opportunity Details (11/8/24)
- Feedback or approve BEAD Pre-Award Design (12/6/24)
- Provide feedback on BEAD Full Proposal Funding Opportunity (1/3/24)
- Add income to VT BEAD Fund once grants are imported (ON HOLD – waiting on PSD)
- Provide list of Areas (tentatively 2/14/25)
- Provide instruction on scoring (weighted, sliding scale) (1/29)
- ~~Send scoring report template (1/29)~~

AMPLIFUND ACTION ITEMS

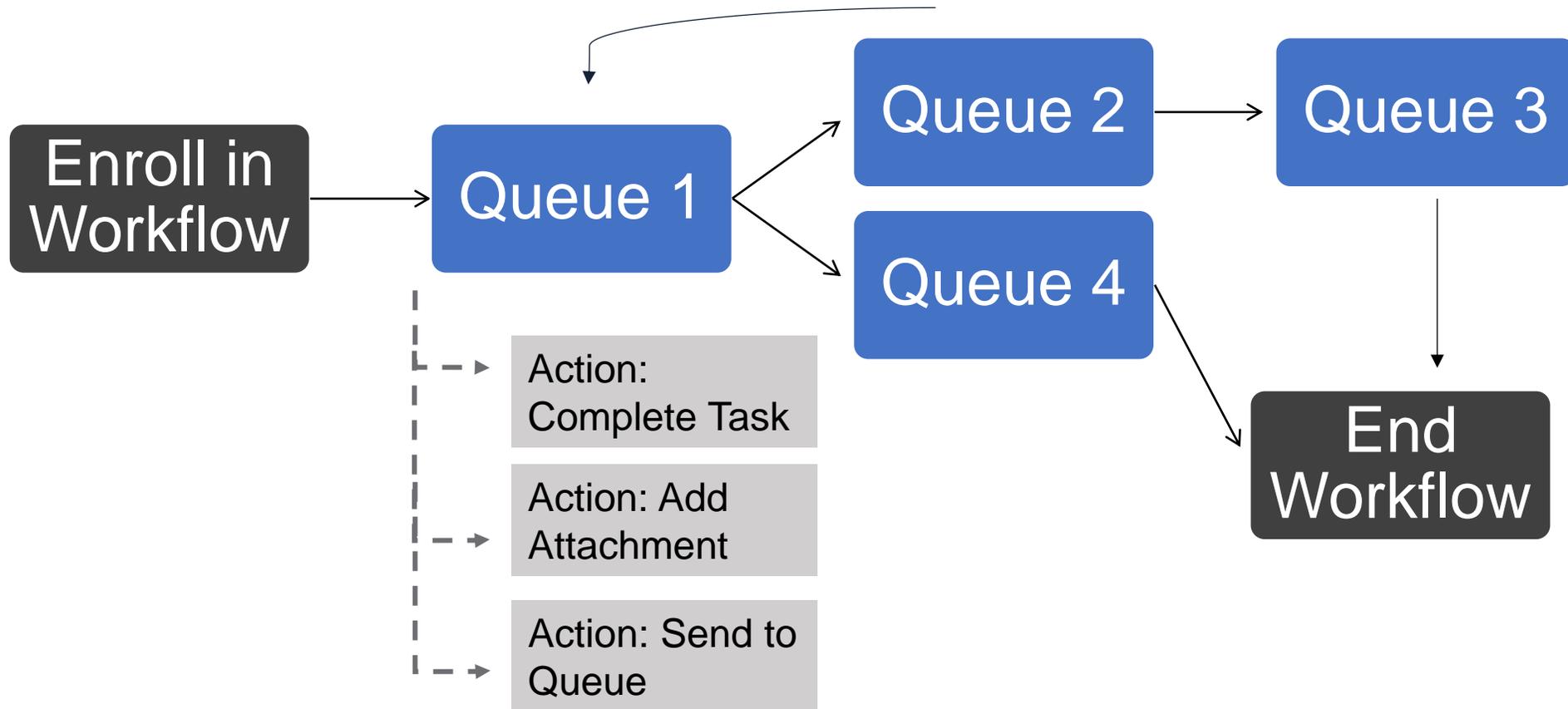
- Edits to Pre-Award Design (1 week after receiving)
- Edits to the 'BEAD Full Proposal' funding opportunity (1 week after receiving)
- Reports
 - Kristina's scoring example
 - tepSubmitted Application (2/7)
- Set up Lucy as a user

Questions?

The logo for AmpliFund, featuring the word "AmpliFund" in a white, sans-serif font. To the right of the text is a green icon consisting of five horizontal bars of increasing height, resembling a bar chart or a signal waveform.

References

Workflow



AmpliFund Workflow Vocabulary

- **(Workflow) Instance:** A collection of workflow queues and actions. An object, i.e. grant, can only be in one workflow instance at a time.
- **Queue:** A stopping point for an object (i.e. Grant) within the workflow instance.
 - Users can be assigned to all actions within a queue
- **Action:** Activities that can occur within a queue.
 - Users are assigned to individual actions.
 - Action Types:
 - > Send to Queue
 - > Add Attachment
 - > Complete Task
 - > Remove from Workflow
- **Workflow Notification:** An email sent to all users with responsibility for an action in an object's current queue

Workflow Email Notification

AmpliFund Administrator <no-reply@gotomygrants.com>
to me ▾



Award Name

Dear Test User 1

'[Test] Workflow 1' has been moved to the 'Tribal Affairs Director - Request to Apply' Queue and may require you to take action.

Workflow Queue

Link to Workflow Actions in Activity

Please [click here](#) to view this item.

Regards,
AmpliFund Administrator

AmpliFund is the leading enterprise grant management platform designed for nonprofit and public sector organizations to manage every phase of the grant management process.

Application Notifications

Application Submitted – to Funder



Hello **User First Name**

You are receiving this notification because the application **Application Name**
as been successfully submitted for the **Opportunity Name**

Application Name 10/23/2020 9:09 AM (Eastern Daylight Time)

Please login to AmpliFund to review the submitted application.

Regards,
AmpliFund Administrator
Grant Maker Organization Name

AmpliFund is the leading enterprise grant management platform designed for nonprofit and public sector organizations to manage every phase of the grant management process.

Application Submitted – To Applicant



Hello **User First & Last Name**

You are receiving this notification because your application has been successfully submitted to

Funder Name for the **Opportunity Name**

Application Name 10/23/2020 9:09 AM (Eastern Daylight Time)

Please reach out to the primary contact for the opportunity if you have questions about your application.

Regards,
AmpliFund Administrator
Organization Name

AmpliFund is the leading enterprise grant management platform designed for nonprofit and public sector organizations to manage every phase of the grant management process.

Application Approved



Hello Name,

You are receiving this AmpliFund notification email because the status of the application you submitted to **Funder Name** for **Opportunity Name** been updated.

Your application, **App Name** now has a status of Approved.

Select <https://www.gotomygrants.com/> to log in to the Amplifund Applicant Portal to view your application.

Regards,
AmpliFund Administrator

AmpliFund is the leading enterprise grant management platform designed for nonprofit and public sector organizations to manage every phase of the grant management process.

Application Rejected



Hello **User First Name**

You are receiving this AmpliFund notification email because the status of the application you submitted to **Funder Name** for **Opportunity Name** has been updated.

Your application, **Application Name** now has a status of Rejected.

Select <https://www.gotomygrants.com/> to log in to the Amplifund Applicant Portal to view your application.

Regards,
AmpliFund Administrator
Funder Name

AmpliFund is the leading enterprise grant management platform designed for nonprofit and public sector organizations to manage every phase of the grant management process.

Application Reopened – To Applicant



Hello **User First & Last Name**

You are receiving this AmpliFund notification email because the status of the application you submitted to **Funder Name** for **Opportunity Name** has been updated.

Your application, **Application Name** ; now has a status of **Reopened**.

Select <https://www.gotomygrants.com/> to log in to the Amplifund Applicant Portal to view your application.

Regards,
AmpliFund Administrator
Organization Name

Withdrawn Application – to Opportunity Manager



Dear Opportunity Manager,

The application **Application Name** has been withdrawn from your posted opportunity, **Opportunity Name**

This application will be removed from all workflows and will have the status of withdrawn.

To view the withdrawn application select

<https://www.gotomygrants.com/RequestForProposals/OpportunityApplications/Details/6934>

or log in to your AmpliFund account.

Sincerely,

AmpliFund Administrator

AmpliFund is the leading enterprise grant management platform designed for nonprofit and public sector organizations to manage every phase of the grant management process.

Award Activation



Hello Admin,

You are receiving this notification because your organization has been given an award from **Funder name**

This award of **#years #months 0 days** begins on **Award Start Date**

If you currently use AmpliFund, please [login](#) to see the details of your award and get started.

If you have never used AmpliFund, please use [this link](#) to set your password and login.

Regards,
AmpliFund Administrator
Funder name

AmpliFund is the leading enterprise grant management platform designed for nonprofit and public sector organizations to manage every phase of the grant management process.

Customer Support

Access Customer Support



Visit the support portal

<https://amplifund.zendesk.com>

Submit a support ticket

support@amplifund.zendesk.com or in product

Call the help desk

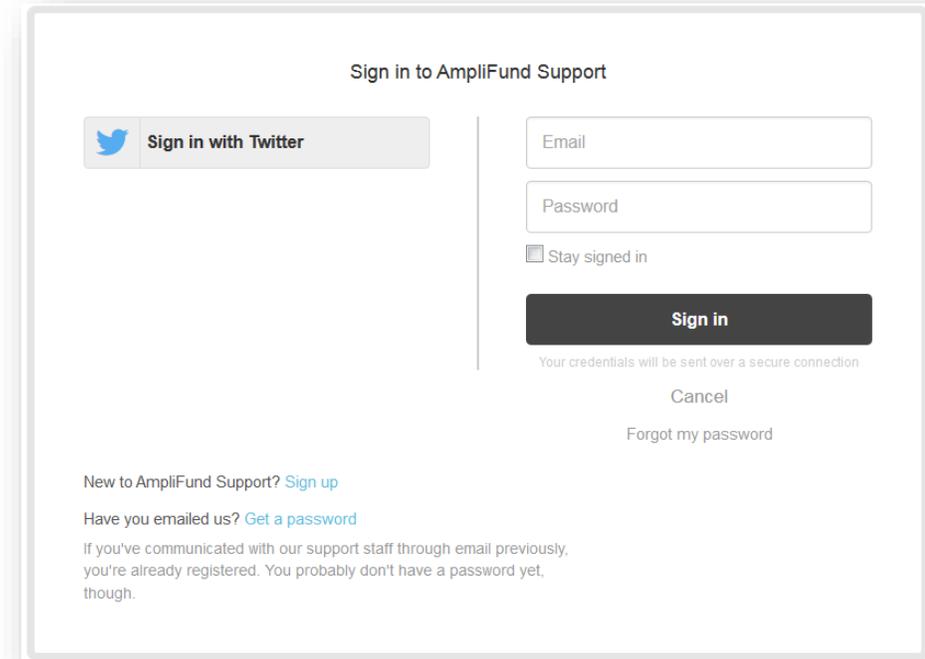
(844) 407-3572

Customer Support Hours

8:00am – 8:00pm ET, Monday through Friday,
excluding holidays

AmpliFund Support Site

1. Go to <https://amplifund.zendesk.com>
2. Click the **Sign up** link
3. Enter your **full name**
4. Enter your **email address**
5. Complete the **I'm not a robot** check
6. Click the **Sign up** button
7. A welcome email from support@zendesk.com will be sent to you via email
8. Click the link to set your password



Sign in to AmpliFund Support

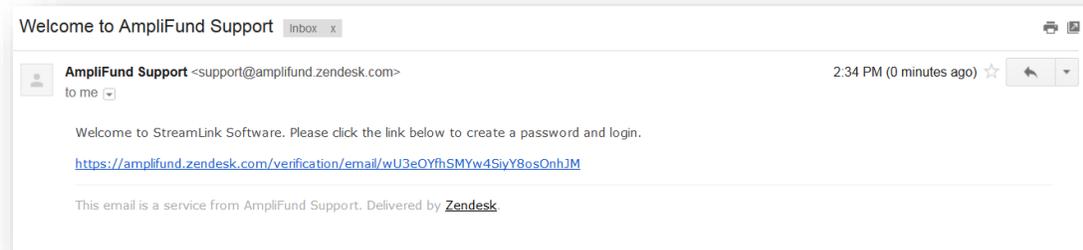
Stay signed in

Your credentials will be sent over a secure connection

New to AmpliFund Support? [Sign up](#)

Have you emailed us? [Get a password](#)

If you've communicated with our support staff through email previously, you're already registered. You probably don't have a password yet, though.



AmpliFund Support Site

AmpliFund

Have a question about AmpliFund? Search our support site.

- Release Notes**
Weekly announcement of enhancements, updates, and fixes in AmpliFund
- User Guides**
AmpliFund User Guides and Quickstart Guides for download
- Instructions**
Step-by-step instructions on using AmpliFund's features
- Upcoming Training and Videos**
Live training events and videos on how to use AmpliFund
- Import Templates**
Excel templates for importing data into AmpliFund
- FAQs**
Frequently Asked Questions about using AmpliFund
- Submit a Ticket**
Still need help? Submit a request to our help desk.

From: [Hallquist, Christine](#)
To: [Farnham, Douglas](#)
Cc: [Anderson, Will](#); [Clithero, Toni H](#); [Johnson, Kerrick](#); [Sweet, Kristina \(she/her\)](#)
Subject: Acceptance of the Digital Equity Capacity Grant
Date: Thursday, January 23, 2025 12:07:24 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Doug,

With everything going on at the Federal Level, you may want to reach out to the Governor and sign off on the acceptance of the \$5.3 million Digital Equity grant. I would hate to lose it due to our internal delay. Things are a big crazy in Washington.

With warm regards,
Christine Hallquist
Executive Director
christine.hallquist@vermont.gov
(802)636-7853
[Vermont Community Broadband Board](#)



From: [Claire Ockner](#)
To: [James Burt](#); [Izarek, Sweet, Kristina \(she/her\)](#); [Monsarrat, Alexei](#); [Matthews, Alissa](#); [Collier, Tracy](#); [Tuxill, Stephanie](#)
Cc: [Lucyrogersvt](#); [Kwloterstorff](#); [mitchell.skleres@rmsus.com](#); [Wade, Jen](#); [Ledoux, JB](#)
Subject: AmpliFund | VCBB 1/29 Session Follow-Up
Date: Thursday, January 30, 2025 3:34:02 PM
Attachments: [image001.png](#)
[image002.png](#)
[VCBB BEAD Opportunity Workflow.xlsx](#)
[Vermont VCBB User Acceptance Testing Grant Maker - Pre-Award.xlsx](#)
[VCBB-Vermont Public Service Grant Maker Pre-Award Design v3.pdf](#)
[20250129_VCBB-Vermont Public Services GM Configuration 6 BEAD Review Workflow.pdf](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hi Team,

Thanks for your time on our session! Please see below for action items to keep your implementation on track from our most recent session.

SA-7342	Anish Ghimire	Build BEAD Scoring Report	14-Feb-25	<p>Create custom scoring report based on template provided by VCBB. Cannot begin until template is sent and final scoring format decisions are made (SA-7341 and SA-7344).</p> <p>Other fields to include: Application Name, Amount Requested, Type of Project, Project Area, Avg. Cost per Location (How many served/amount requested).</p>
SA-7367	Customer	Provide feedback/test the BEAD Opportunity Workflow	14-Feb-25	<p>Use the UAT script (VT PSD - VCBB_User Acceptance Testing_Grant Maker - Pre-Award.xlsx) to review the funding opportunity. You can complete scenario 2. To provide feedback on the workflow, make comments in the VCBB BEAD Opportunity Workflow.xlsx spreadsheet. AmpliFund needs final edits no later than 2/14 to support a 3/3/25 go-live. The timeline will be for AmpliFund to make edits by 2/21. VT PSD can do final testing by 2/25. AmpliFund will make final edits by 2/27. VCBB can publish for go-live on 2/28.</p>
SA-7341	Customer	Provide final scoring to AmpliFund	29-Jan-25	<p>Provide final scoring to AmpliFund. Items discussed in 1/24 session were whether weighted scoring or a scoring scale would be used. AmpliFund cannot finalize the scoring in the opportunity or scoring reports until this is received.</p> <p>1/29/25 update: AmpliFund needs final scoring no later than 2/14 to support a 3/3/25 go-live. The timeline will be for AmpliFund to make edits by 2/21. VT PSD can do final testing by 2/25. AmpliFund will make final edits by 2/27. VCBB can publish for go-live on 2/28.</p>
SA-7306	Customer	Provide standard list of rejection reasons to AmpliFund	28-Jan-25	<p>In 1/22 session, it was decided that VCBB wants to log a standard list of rejection reasons. Please provide this standard list to AmpliFund, so it can be built into the workflow.</p>
SA-7117	Customer	Add Income to the VT-BEAD Fund once grants are imported	31-Jan-25	None
				<p>Use the UAT script (VT PSD - VCBB_User Acceptance Testing_Grant Maker - Pre-Award.xlsx) to review the funding opportunity. You can complete scenarios 1.1 & 1.2. To provide feedback on the application, download a PDF and make comments in the PDF on questions that need to be adjusted.</p> <p>*Items to check:*</p> <ul style="list-style-type: none"> * Conditional questions * Formatting of questions (multi-line, table, numeric, single line, multiple choice, dropdown, etc.) * Formatting of form (bold/italics/etc., color, headers, etc.) * Verify all links are correct (CPI, BEAD NOFO are not working) * All questions that should be required are * Budget <p>*Items to Provide:*</p> <p>_(12/18/24 session)_</p> <ul style="list-style-type: none"> * Final Certification * Instructions for each budget category <p>*AmpliFund Update:*</p> <ul style="list-style-type: none"> * 12/18/24: Note that all edits requested in the 12/18/24 session have been made, expect for re-ordering the budget categories. That is in progress. * 1/22/25 update: Categories have been re-ordered. VCBB needs to prioritize testing to be

				ready for the 3/3 go-live. Testing should ideally be concluded by 2/7. * 1/29/25 update: AmpliFund needs final edits no later than 2/14 to support a 3/3/25 go-live. The timeline will be for AmpliFund to make edits by 2/21. VT PSD can do final testing by 2/25. AmpliFund will make final edits by 2/27. VCBB can publish for go-live on 2/28.
SA-6798	Customer	Provide feedback/test the BEAD Full Proposal Funding Opportunity	3-Jan-25	
SA-6634	Customer	Provide feedback or approve BEAD Pre-Award Design (workflow)	6-Dec-24	Use comments in the PDF to provide feedback (see _VCBB-Vermont Public Service_Grant Maker Pre-Award Design v2.pdf_). Answer any outstanding questions, so that the Design can be edited. Configuration sessions will not continue until design is approved.
SA-6512	Customer	VCBB - Provide list of Project Areas	14-Feb-25	Provide a complete list of Project Areas for the full proposal. These areas may change based on the pre-proposals. AmpliFund is expecting this list mid-February.
SA-6510	Customer	VCBB - Complete the opportunity details fields on BEAD Full Proposal Funding Opportunity	8-Nov-24	To access the funding opportunity, use the left menu to select Award Management. Then choose Funding Opportunities. Click on the Opportunity Details. This is a landing page for your applicants. Click the edit pencil in the upper right. Complete any fields that you want to use. Uncheck the box to hide the unused fields. In 12/11/24 meeting, we checked that everyone had access and agreed to complete by 12/18. You can also use the UAT script (VT PSD - VCBB_User Acceptance Testing_Grant Maker - Pre-Award.xlsx) to help with this action item. See scenarios 1.1 and 1.2.
SA-6797	James Burt	Provide pre-award design sign-off	19-Dec-24	None

AmpliFund Session Follow-up	
Session Title	Grant Maker Configuration 5: BEAD App. Review Workflow
Date	1/29/2025
Recording Link	https://rooms.vidyard.com/rooms/okBQJISu67IYNRpmr4n7g

Below are details about our next session

Next Session	
Session Title	2/12/25 Grant Maker Configuration 6: BEAD App. Review Workflow
Topics	<ol style="list-style-type: none"> 1. IPP Review 2. Review Rejection route of BEAD Workflow <ol style="list-style-type: none"> a. Other Last-Mile Scoring 3. Timeline Discussion <ol style="list-style-type: none"> a. Discuss when all testing needs to be complete so edits can be made before 3/3/25 go-live 4. Next Steps

Thank you!

Claire Oekner
Customer Success Coordinator
o. (216) 377-5500
www.amplifund.com



From: [James Burt](#)
To: [VCBB](#)
Subject: AmpliFund | VCBB: 1/22 Follow-up
Date: Friday, January 24, 2025 7:00:44 AM
Attachments: [image001.png](#)
[20250122_VCBB-Vermont Public Services_GM Design 2 - BEAD Review Workflow.pdf](#)
[VCBB-Vermont Public Service Grant Maker Pre-Award Design v3.pdf](#)
[Vermont VCBB User Acceptance Testing Grant Maker - Pre-Award\(Scenarios\).csv](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Good morning!

Thanks for attending your Implementation Session on 1/22 covering Grant Maker Design 2: BEAD App. Review Workflow.

- Here is a [link](#) to your Vidyard Room.
- Here is a [link](#) to your current action items.
 - Corresponding documents are attached.

In your next session, you will cover Grant Maker Pre-Award Configuration 5 - Opportunity Workflow. If you have any questions or need assistance, please feel free to reach out.

Best regards,

James Burt, MPA
Project Manager
(740) 421-0268
www.amplifund.com



Need help? Visit our support site [here](#) for user guides, videos, step-by-step instructions, and online ticket management or submit your question directly to AmpliFund Customer Support by emailing support@amplifund.zendesk.com.

You're receiving this message because you're a member of the VCBB group from streamlinksoftware.com. To take part in this conversation, reply all to this message.

[View group files](#) | [Leave group](#) | [Learn more about Microsoft 365 Groups](#)

From: [Christa Shute, NEK ED](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: bead prep docs
Date: Friday, January 24, 2025 5:00:12 PM
Attachments: [NEKCV dba CV BEAD Potential Subrecipient Support Grant Program Grant Amendment Applicationredo.doc](#)
[NEKCV dba NEK BEAD Potential Subrecipient Support Grant Program Grant Amendment Application.doc](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Kristina,

I tried to address your questions. I changed some things based on new information. I think all the questions he asked were answered in the original document but I tried to make it more obvious. If he continues to have an issue then we should just meet with him to discuss. I don't think he appreciates how incredibly complicated this is. Especially with the potential changes coming from the new administration. I am providing this in word version so that people can just put comments in if there are issues.

Thank you,

Christa

From: [Mary Haley](#)
To: [Matthews, Alissa](#); [Monsarrat, Alexei](#); [Teles Fremin](#)
Cc: [Clithero, Toni H](#); [Hallquist, Christine](#); [lucyrogersvt](#); [Sweet, Kristina \(she/her\)](#); [Christina Nick](#); [Nick Floersch](#)
Subject: BEAD Pre-Proposal Review Meeting Summaries 1/21 & 1/24
Date: Friday, January 24, 2025 4:24:30 PM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hi all! Here are our Summary and Detailed Notes from our pre-proposal review meetings this week. I've tried to summarize the current submissions VCB/CTC/Stone should be looking into more closely up top and included the detailed notes for each reviewed submission/modification for each meeting.

Summary

Teles (CTC) tasks:

- High cost modifications in NEK Submission for PA046
- High cost modifications in Consolidated Submission for PA042
- High cost modifications in DVFiber Submission for PA042
- Remove modifications in DVFiber Submission from PA042 to a new PA. (might be mis-using the mod type)
- Remove modifications in DVFiber Submission from PA042 to PA042 (essentially, they want to subdivide the existing PA)

Alexei tasks:

- Reach out to submitters for confirmation evidence of successful FCC challenge:
 - Non BSL Challenge modifications from NEK Submission for PA046
 - Non BSL Challenge modifications from Comcast Submission for PA034
 - Non BSL Challenge modifications from Comcast Submission for PA044
 - Non BSL Challenge modifications from Maple Submission for PA045
 - Non BSL Challenge modifications from DVFiber PA042

Stone tasks:

- Review high cost modifications location overlap in DVFiber & Consolidated Submissions for PA042
- Review multiple Non BSL Challenge modifications from Consolidated for PA044 for ARPA Grant Overlap

Alissa's tasks:

- Review multiple Non BSL Challenge modifications from Consolidated for PA044 for ARPA Grant Overlap

1/21 Meeting Details:

PA001

SpaceX Submission

- No modifications
 - *Not a priority project proposal, specifies they will submit on behalf of all project areas.*

PA046

NEK Submission

- Modification: Prohibitively costly to serve and should be added to a new project area.
 - Teles will review these locations in detail, with additional evidence being sent before accepting.
- Modification: Non BSLs should not be served under BEAD.
 - Alexei will review the photos evidence submitted for these locations. VCBB will follow up with Submitter to request evidence of official challenge submission to FCCs - screen shots, csv, confirmation number of submission. Likely will accept these challenges to locations but would still like to have the evidence of submission due diligence.
- Modification: Add locations from PA047 to the selected PA (PA046).
 - *Not reviewed, locations primarily in Montgomery Center.*
- Modification: Remove from their current PA (PA046) and added to a different existing PA (PA047).
 - *Need to review with submissions related to PA047*
- Modification: Add locations from PA044 to the selected PA (PA046).
 - *Revisit, confusion over locations in Elmore.*
- Modification: Remove from their current PA (PA046) and added to a different existing PA (PA007).
 - *Need to review with submissions related to PA007*

Comcast Submission

- Modification: Remove from current PA (PA046) and added to a new PA.
 - *Not accepting – Indicates in evidence this is not a priority project proposal. Received one other priority bid for this project area that outweighs the request for change (only focusing on a portion of the entire PA046 un/underserved address).*

1/24 Meeting Details:

PA034

Comcast Submission

- Modification: Non BSLs should not be served under BEAD
 - Alexei will review the photos evidence submitted for these locations. VCBB will follow up with Submitter to request evidence of official challenge submission to FCCs - screen shots, csv, confirmation number of submission. Likely will accept these challenges to locations but would still like to have the evidence of

submission due diligence.

Vermont Telephone Company Submission

- No modifications
 - *Not reviewed with the group, submitting as a priority broadband project but do not operate a network that meets VCBB's outside plant design standards. Needs further review.*

PA045

Maple Submission

- Modification: Not BSLs and should not be served under BEAD.
 - Alexei will review the photos evidence submitted for these locations. VCBB will follow up with Submitter to request evidence of official challenge submission to FCCs - screen shots, csv, confirmation number of submission. Likely will accept these locations but would still like to have the evidence of submission due diligence.
- Modification: Remove from the selected PA (PA045) and added to a different existing PA (PA043).
 - *Likely accept - Special Flag 1135831385, should this be moved to a new area or high cost area? Need to revisit.*

Comcast Submission

- Modification: Remove from current PA (PA045) and added to a new PA.
 - *Not accepting – Indicates in evidence this is not a priority project proposal. Received one other priority bid for this project area that outweighs the request for change.*

PA042

Comcast Submission

- Modification: Remove from current PA (PA042) and added to a new PA.
 - *Not Accepting - Indicates in evidence this is not a priority project proposal. Two other priority bids received for this project area that out weighs the request for change.*

Consolidated Submission

- Modification: Remove from current PA (PA034) and add to selected PA (PA042).
 - *Not Accepting - One other priority bid received for this project area that out weighs the request for change.*
- Modification: Prohibitively costly to serve and should be added to a new project area.
 - Stone look at overlap with DVFiber submission for PA042 for high cost.
 - Teles will review all locations they are indicating high cost.
 - Teles will review all locations they are indicating high cost, trying to compare \$ averages to look at the bids more granularly.

DVFiber Submission

- Modification: Remove from their current PA (PA042) and added to a new PA.
 - Teles will go through individual locations associated to the modification to remove from PA042 and added to a new PA even though they indicate in evidence that these locations already have service via coverage on the FCC maps. Might be more relevant to BSL challenge as they have existing service, but review of their evidence needs to occur.
- Modification: Prohibitively costly to serve and should be added to a new project area.
 - Stone look at overlap with DVFiber submission for PA042 for high cost.
 - Teles will review all locations they are indicating high cost.
 - Teles will review all locations they are indicating high cost, trying to compare \$ averages to look at the bids more granularly.
- Modification: Not BSLs and should not be served under BEAD.
 - Alexei will review the photos evidence submitted for these locations. VCBB will follow up with Submitter to request evidence of official challenge submission to FCCs - screen shots, csv, confirmation number of submission. Likely will accept these locations but would still like to have the evidence of submission due diligence.
- Modification: Remove from their current PA (PA042) and added to the selected PA (PA042).
 - Teles to review. Essentially requesting they be added to new PAs (subdivisions of the existing PA042 along town borders to encourage cost effectiveness and reducing overbuild). Likely needs further review.

PA044

Consolidated Submission

- Modification: Not BSLs and should not be served under BEAD. (Multiple)
 - Alissa/Stone review evidence as they indicate these locations are likely already served under ARPA. Might be a grant compliance issue that we need to figure out before finishing review of the PA submissions.

Comcast Submission

- Modification: Not BSLs and should not be served under BEAD.
 - Alexei will review the photos evidence submitted for these locations. VCBB will follow up with Submitter to request evidence of official challenge submission to FCCs - screen shots, csv, confirmation number of submission. Likely will accept these locations but would still like to have the evidence of submission due diligence.

Project GIS Specialist
535 Stone Cutters Way Montpelier, VT 05602 USA

phone 802-363-1201

email [mhaley@stone-
env.com](mailto:mhaley@stone-env.com)

web www.stone-env.com



This communication, including any attachments, is solely for the confidential use of the person(s) named above (addressees), and may contain proprietary, confidential and/or privileged information and is protected by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521. If you are not the intended recipient, any use, copying, disclosure, dissemination or distribution is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, delete this communication and destroy all copies.

From: [Mary Haley](#)
To: [Matthews, Alissa](#); [Monsarrat, Alexei](#); [Iucyrogersvt](#); [Sweet, Kristina \(she/her\)](#)
Cc: [Hallquist, Christine](#); [Clithero, Toni H](#); [Christina Nick](#); [Teles Fremin](#); [Bender, Maggie](#)
Subject: BEAD Pre-Proposal Review Meeting Summary 1/27
Date: Tuesday, January 28, 2025 5:05:29 PM
Attachments: [image001.png](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Evening everyone! Here is a summary/details of what we reviewed yesterday. We looked at PA047 (NWX CUD), revisited PA046 (NEKCV CUD), and revisited PA042 (DVFiber CUD). **Please make sure to review the bolded sections of the detail section.** I've included some of the Stone findings in regard to the scenarios of creating new PAs for 042 and PA046/047. This is relevant to RSM's cost model processing and the discussion we were having around how the addition of new PAs fosters competition between priority bidders.

Please forward if I am missing anyone.

Summary

Teles (CTC) tasks:

- Finalize existing review tasks from last meetings related to high cost modifications.
- Review the high-cost locations submitted by Consolidated for PA047 in the evidence groups (Lake Champlain, Franklin Telephone Wirecenter/Lake Carmi, and Eastern PA locations). Specifically follow up with CCI about their evidence and reasoning behind the Butler/Knight/Burton Island Lake Champlain locations high cost amounts – how did they get to these numbers? What went into estimating them? Cost of permitting?

Alexei tasks:

- Reach out to submitters for confirmation evidence of successful FCC challenges for Non BSL challenge submissions. Mary (Stone) will provide a table to track review.
 - Specifically follow up with Consolidated for PA047 submission and make sure their location list for this, matches their evidence they sent.

Stone tasks:

- Create a tracking table for Alexei to use when following up on evidence submission for Non-BSL challenges/evidence/followup
- Stone will look into the impact of accepting the new project area on the total under/unserved addresses in PA046/047 as well as PA042 include Maggie Bender on outputs.
- Review multiple Non BSL Challenge modifications from Consolidated for PA044 for ARPA Grant Overlap

RSM tasks:

- Run cost model with change of adding new PA for PA046/047 and new PAs for PA042 against cost model. Get in touch with Stone for specifics!

Alissa's tasks:

- Review multiple Non BSL Challenge modifications from Consolidated for PA044 for ARPA Grant Overlap
-

1/27 Meeting Details:

PA047

Consolidated Submission

- Modification: Prohibitively costly to serve and should be added to a new project area.
 - Only Fiber bid for this PA. They split locations into evidence groups - sub marine cable, outside footprint/new infrastructure, long stretch of new conduit. Locations in Franklin Telecom wirecenter, Franklin isn't an ideal bidder, so it might make more sense to separate the grouped locations into their own areas.
 - CTC/Teles will review the high-cost locations in the evidence groups and follow up with CCI about their evidence and reasoning behind the Butler/Knight/Burton Island locations high cost amounts – how did they get to these numbers? What went into estimating them? Cost of permitting?
 - Potential outcome, make these locations a new project area. We consider looking at the balance of the state/PA if it will get us more fiber even if it's less expensive.
 - *Revisit with the group after CTC follow up.*
- Modification: Not BSLs and should not be served under BEAD.
 - Alexei follow up with Consolidated and make sure location list for this, matches their evidence they sent. Example:1037396346 - Actually a BSL but shouldn't be a part of BEAD Proposal, issue with the options available for proposal. VCBB will follow up with Submitter to request evidence of official challenge submission to FCCs - screen shots, csv, confirmation number of submission.

Comcast Submission

- Remove from their current PA (PA047) and add to a new project area.
 - *Not Accepting - Indicates in evidence this is not a priority project proposal. Received other priority bids for this project area that outweighs the request for change.*

NEK Community Broadband

- Remove from their current PA (PA046) and added to the selected PA (PA047).
 - Aligns with PA046 NEK modification submission. Making these locations their own project area would be fostering competition between CCI and NEK. Both in priority bids but neither are bidding to serve EVERY priority bid (NEK/CCI both submitted modifications for this PA). Encourages competition, which is an advantage to get higher value bids that allow VCBB to serve more addresses elsewhere.
 - **Stone will look into the impact of accepting the new project area on the total under/unserved addresses in PA046/047, include Maggie Bender on outputs.**
 - **Proposed Creation of New PA from PA047 Modification**
 - **PA047 (NWX) Impacts**
 - **Current PA047 Eligible Locations: 3,294**

- Proposed Modification Change (addition of 13 PA046 locations and removal of 146 PA047 locations to new PA) : 3,161
- New PA Impacts
 - Eligible Locations for Competitive Bid: 146
- RSM can run change against cost model.

PA046 – Continued

NEK Community Broadband

- Add locations from PA047 to the selected PA (PA046).
 - Aligns with PA047 NEK modification submission. Making these locations their own project area would be fostering competition between CCI and NEK. Both in priority bids but neither are bidding to serve EVERY priority bid (NEK/CCI both submitted modifications for this PA). Encourages competition, which is an advantage to get higher value bids that allow VCBB to serve more addresses elsewhere.
- Remove from their current PA (PA046) and added to a different existing PA (PA047).
 - Accepting the addition (moving) of these locations to PA047
 - Current PA046 Eligible Locations: 8,908
 - Proposed Modification Change (removing 13 locations from PA046 and adding to PA047): 8,895

PA042 – Continued

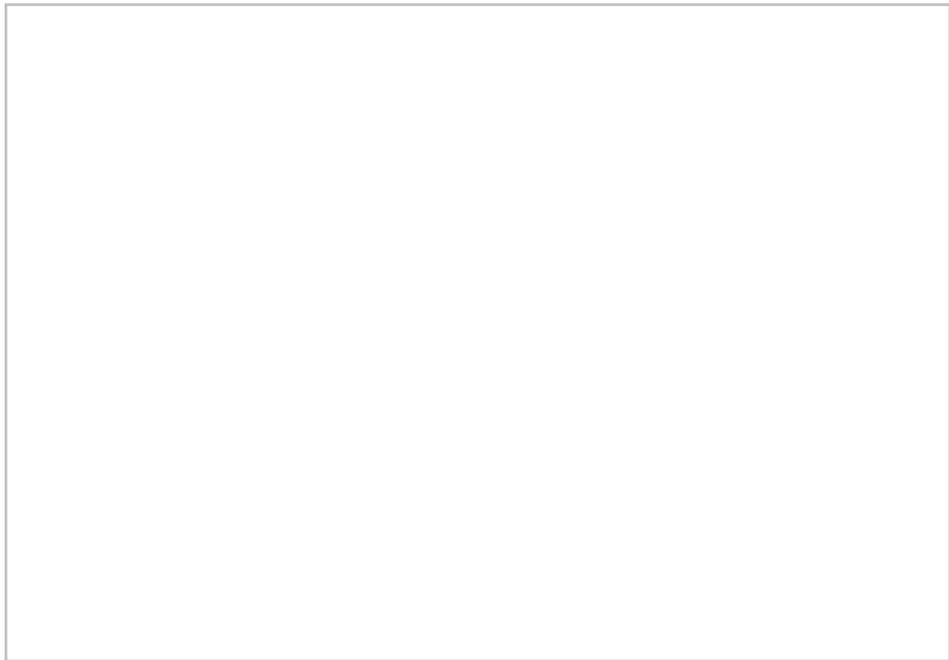
Consolidated Submission

- Modification: Prohibitively costly to serve and should be added to a new project area.
 - Stone/CTC confirmed 58 of these locations overlap with high cost locations submitted by DVFiber.
 - Teles will finalize review of locations they are indicating high cost

DVFiber Submission

- Modification: Prohibitively costly to serve and should be added to a new project area.
 - Stone/CTC confirmed 58 of these locations overlap with high cost locations submitted by Consolidated.
 - Teles will finalize review of locations they are indicating high cost
- Modification: Remove from their current PA (PA042) and added to the selected PA (PA042).
 - Essentially requesting they be added to new PAs (subdivisions of the existing PA042 along town borders to encourage cost effectiveness and reducing overbuild). Justification of subdivision for PA is it would reduce the need to remove of high cost locations / avoid areas of overbuild. Would also encourage more competition, DVFiber would be put in a better position to take on the larger area and then the smaller areas would be the lowest bidder. Consistent to the NEK/CCI situation in PA047/PA046
 - Stone to look into the impact of accepting the subdivision on the total under/unserved addresses in PA042, include Maggie Bender on outputs.
 - Proposed PA042 Subdivisions (generally following town/groups of town boundaries)
 - Current PA042 Under/Unserved Locations: 2850
 - Subdividing PA042 Scenario Under/Unserved Locations:
 - Note: the table below totals to 2849 locations – it appears that a single location was not included in DVFiber’s proposed mod submission. We would just want to confirm they meant to include FCC ID 1297215559.

Subdivision PA	Total Under/Unserved
PA042.0	1967
PA042.1	214
PA042.2	252
PA042.3	36
PA042.4	380



- o RSM can run change against cost model. Follow up with Stone on other specifics you need for model.

Mary Haley (she/her)

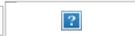
Project GIS Specialist

535 Stone Cutters Way Montpelier, VT 05602 USA

phone 802-363-1201

email mhaley@stone-env.com

web www.stone-env.com



This communication, including any attachments, is solely for the confidential use of the person(s) named above (addressee), and may contain proprietary, confidential and/or privileged information and is protected by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521. If you are not the intended recipient, any use, copying, disclosure, dissemination or distribution is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, delete this communication and destroy all copies.

From: [Purvis, Clay](#)
To: [Sweet, Kristina \(she/her\)](#); [Monsarrat, Alexei](#); [Raboin, Ginny](#)
Cc: [Clithero, Toni H](#); [Farnham, Douglas](#); [Hallquist, Christine](#)
Subject: BEAD Semi-Annual Report Reminder
Date: Tuesday, January 21, 2025 3:24:16 PM
Attachments: [DOC BEAD Semi-Annual Report v1.2 Attachment Template \(1\).xlsx](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hi Everyone,

Just a reminder, that the SAR 1.2 is due to NTIA by January 30, 2025 (NOT January 31). The template has some additional information that we are collecting for both the Planning funds and IPFR funds.

The biggest change is for Grantees who received IPFR funding for non-deployment projects **and** conducted activity on those non-deployment projects between July 1, 2024 and Dec 31, 2024. I don't think this applies to NH.

The Broadband USA website has a training video on these changes, the SAR 1.2 Guidance document, and the NGP Clickpath: [Broadband Equity, Access, and Deployment \(BEAD\) Semi-Annual \(Technical\) Report Guidance Version 1.2 | BroadbandUSA](#)

The attachment will be uploaded into the NGP with your SAR submission and can be found attached to this email and here: [BEAD Semi-Annual Report Attachment Template | BroadbandUSA](#). Let me know if you have any questions. Thank you,
Clay

Clay Purvis

Federal Program Officer, Vermont & New Hampshire | Office of Internet Connectivity and Growth

National Telecommunications and Information Administration

U.S. Department of Commerce

202.834.1879 | clpurvis@ntia.gov

VCBB's Position on Changes to the Broadband Equity, Access, and Deployment (BEAD) Program

In response to suggested changes to the BEAD program, the Vermont Community Broadband Board (VCBB) recommends the following adjustments to the program:

1. **Accelerate the program:** Review is understandable, but pausing the program during review will disrupt ongoing selection processes and cause added expense and confusion for states and prospective subrecipients. In no case should states be forced to redo Initial Proposals, challenge processes, or any part of completed subgrantee selection.

2. **Provide maximum flexibility and autonomy to the states:** We need to remove guardrails, not add them. Most states have already successfully managed ARPA (American Rescue Plan Act) broadband infrastructure grants. We should be given greater discretion over:
 - Technology choice: We should retain the fiber first principle and states should maintain authority to choose whatever technology best suits their terrain and meets goals of reliability, redundancy, future proofing, and lowest cost.
 - Waivers: States should manage the many potential waivers currently envisioned.
 - Permitting: The current permitting process raises costs, diverting construction funds into paperwork. Remove the requirement that NTIA and NIST review all permits prior to starting any construction and exempt all aerial construction from NEPA.

3. **Streamline project approval process:** Remove the final proposal requirement. Requiring the final proposal creates a significant delay in getting shovels in the ground. States can prove to NTIA that we have followed our Initial Proposal via reporting.

From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: A Spectrum War Erupts in D.C.
Date: Tuesday, February 11, 2025 7:51:53 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: A Spectrum War Erupts in D.C.

N.Y. Post Backs Carr on NPR/PBS Probe Analyst Baffled by Montana's View on Starlink FBA Study Links Fiber to Job Growth
Court Shields Charter in Maui Fire Case N.Y. Gov. Enters Cable Spat

TED HEARN
FEB 11 · [PREVIEW](#)



Spectrum: A war of words broke out yesterday over spectrum allocation policies likely to be issued by the FCC under **Chairman Brendan Carr**. CTIA – which represents **AT&T, Verizon, and T-Mobile** – supports an exclusive licensing regime while cable MVNOs **Comcast** and **Charter** prefer unlicensed airwaves to help build out their Wi-Fi facilities that are key to growing their consumer-facing mobile businesses in a cost-efficient manner. The CTIA-backed **Spectrum for Broadband Competition (SBC)** coalition announced a campaign called ‘**End the Cableopoly,**’ claiming that cable opposes exclusive spectrum licensing because Comcast and Charter are losing broadband subscribers to T-Mobile’s and Verizon’s fixed wireless Internet access service that depends on 5G spectrum exclusivity. The cable industry is attempting “to undermine competition from 5G home broadband by starving wireless providers of the spectrum needed to expand access and help close the digital divide,” the SBC said. **NCTA – The Internet & Television Association** issued via

email one of its toughest statements in recent memory. “**Big Mobile’s sham coalition** is nothing more than a smokescreen to hide the fact that today’s **wireless robber barons** want to advance policies that will allow them to hoard more public spectrum for their exclusive use, denying access to other innovators and wrecking national security in the process,” the trade group for Comcast and Charter said. Comcast and Charter combined serve about 17.7 million mobile subscribers under network-sharing deals with Verizon. The FCC lost its legal authority to allocate spectrum via competitive bidding in March, 2023, but Congress could restore it in the pending reconciliation bill with instructions that the FCC raise about \$60 billion in auction revenue over 10 years.



The wireless industry-backed Spectrum for Broadband Competition coalition began with an aggressive PR campaign against the cable industry...

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



LIKE



COMMENT



RESTACK

© 2025 Ted Hearn

548 Market Street PMB 72296, San Francisco, CA 94104

[Unsubscribe](#)



From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Buckeye Broadband President Calls Out Newsmax on 'Blatant Cash Grab' and 'Price Gouging'
Date: Tuesday, February 4, 2025 7:24:15 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Buckeye Broadband President Calls Out Newsmax on 'Blatant Cash Grab' and 'Price Gouging'

Arielle Roth Nominated to Run NTIA O'Rielly: Congress Needs to Battle Copper Theft Nispel: BEAD Getting a Makeover She's No SeveRINO about Net Neutrality Carr: Candeub Can Do as FCC GC

TED HEARN
FEB 4 · [PREVIEW](#)



Dropped: Buckeye Broadband in the Toledo, Ohio, area has dropped Newsmax because the conservative cable network sought large sequential rate hikes at a time when Buckeye was trying to retain subscribers by shielding them from rising bills. “Newsmax demanded a 50% rate increase this year, and it wanted to lock Buckeye (and its customers) into additional rate increases mandated in the following two years totaling over 90%,” **Buckeye Broadband President & General Manager Geoff Shook** said in an email to *Policyband* yesterday. Buckeye has been doing its own belt tightening of late, which has caused the loss of some local jobs. Shook said he was disappointed programmers like Newsmax were not chipping in. “My personal view is that Newsmax is taking advantage of the current political environment to make a

blatant cash grab, not just this year but for years to come. This seems the equivalent to the **price gouging** we saw during Covid for toilet paper and Lysol,” Shook said.
(*Continued after paywall.*)



Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



© 2025 Ted Hearn
548 Market Street PMB 72296, San Francisco, CA 94104
[Unsubscribe](#)



From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Cap BEAD Grants at \$1,200 Per Location, ITIF Analysts Say
Date: Wednesday, January 22, 2025 7:52:13 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Cap BEAD Grants at \$1,200 Per Location, ITIF Analysts Say

Carr Appoints Scott Delacourt, Greg Watson to Top FCC Staff Jobs
Quintillion Working on Plan B after Fiber Cut Carr Ends FCC
Promotion of DEI Cox, Rhode Island Settle BEAD Overbuild Case

TED HEARN
JAN 22 · [PREVIEW](#)



BEAD: The **Trump administration** should reject any **state BEAD** plan that includes a per-location cost higher than \$1,200, according to [a new analysis](#) by **Ellis Scherer** and **Joe Kane** at the **Information Technology & Innovation Foundation**. The proposal, released yesterday, said **NTIA** should not allow states to spend billions on costly fiber projects when less expensive alternatives, such as **Starlink** and fixed wireless, are reliable and available. "In short, [low Earth orbit] satellites are often the most economical way to get high-speed broadband to rural areas, even when accounting for monthly service charges. With the LEO option on the table, there is no reason to press forward with far more expensive fiber projects," Scherer and Kane said. NTIA last week approved **Nevada's BEAD plan** that awarded **\$22 million** to **Beehive Broadband** at an average per-location cost of **\$77,013**. A \$1,200 cap would cover the cost of a high-end Starlink terminal and provide a **\$25 monthly discount** on service for two years, said Scherer and Kane, who want the money saved from

their approach to support programs like the **Affordable Connectivity Program (ACP)**. NTIA has so far approved **three state BEAD plans – Louisiana, Delaware, and Nevada** – providing sufficient time to establish the \$1,200 Extremely High Cost per Location Threshold (EHCPLT) cap for the other states and territories. "No state is too far along in the BEAD process to make changes that set a more realistic EHCPLT to make their deployment plans more affordable," Scherer and Kane said. Some states prefer fiber because it provides faster speeds than Starlink and fixed wireless. "While technically true, the high throughput of fiber is no reason to prioritize it at extreme cost. The vast majority of broadband use doesn't require anywhere near gigabit speed," Scherer and Kane said.



Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



LIKE



COMMENT



RESTACK

© 2025 Ted Hearn

548 Market Street PMB 72296, San Francisco, CA 94104

[Unsubscribe](#)



From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Carr Says Bulk Billing Ban Would Have Pushed Internet Bills Much Higher
Date: Tuesday, January 28, 2025 7:47:27 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Carr Says Bulk Billing Ban Would Have Pushed Internet Bills Much Higher

Real Estate Groups Elated by Carr's Move Cruz Goes CRA on Hotspots Will Carr Preempt States? WISPA Applauds Gov. Landry Capito Expects Her BEAD Money Ting Hits Pause in Alexandria, Va.

TED HEARN
JAN 28 · [PREVIEW](#)



Carr: FCC Chairman Brendan Carr yesterday issued a statement regarding his decision to end the agency’s consideration of a ban on bulk billing contracts between Internet providers and landlords who own or manage apartment buildings, condos, and other multiple dwelling units. “During the **Biden-Harris Administration**, FCC leadership put forward a ‘bulk billing’ proposal that could have raised the price of Internet service for Americans living in apartments by as much as 50 percent,” Carr said. “This regulatory overreach from Washington would have hit families right in their pocketbooks at a time when they were already hurting from the last Administration’s inflationary policies.” Republican Carr said the plan proposed by his predecessor, **Democrat Jessica Rosenworcel**, would have hit “seniors, students, and low-income individuals ... particularly hard.” Carr indicated that he’s not

finished. “There is a lot of work ahead to reverse the last Administration’s costly regulatory overreach,” he said. **John Bergmayer, Legal Director at Public Knowledge**, was critical of Carr’s decision. “It’s a shame. The arguments on the pro-bulk-billing side were spurious or overblown ...” he said, adding that bulk billing deals “require people to pay for Internet service they don’t want or need.”...

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



© 2025 Ted Hearn
548 Market Street PMB 72296, San Francisco, CA 94104
[Unsubscribe](#)



From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Comcast's "Annus Horribilis" Triggers Wall Street Selloff
Date: Friday, January 31, 2025 7:32:53 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Comcast's 'Annus Horribilis' Triggers Wall Street Selloff

Charter Loses 117K Broadband Subs in Q4 Sen. Moran Wants BEAD Grants Tax Free Carr Probing PBS, NPR on Ad Violation Sen. Capito's USF Bill to Get Commerce Vote Uriarte Joins FCC's Gomez

TED HEARN
JAN 31 · [PREVIEW](#)



Wall Street: Ugly. That’s what yesterday was like on **Wall Street** for a few cable stocks. **Comcast, Cable One, and Shentel** each hit **52-week lows** on a day when the **Dow, the S&P 500, and the NASDAQ** had nice gains. The cause? Comcast reported losing **139,000 broadband subscribers**, more than expected and an indication that the company had more work to combat competition from fiber overbuilders and **Fixed Wireless Access** services of **T-Mobile** and **Verizon**. “Comcast has underperformed the **S&P 500 by 40 percentage points** since the end of 2023,” **MoffettNathanson Senior Managing Director Craig Moffett** said in a client memo Thursday. He referred to 2024 as Comcast’s *annus horribilis*, a Latin phrase for “terrible year” made famous by **Queen Elizabeth II** in 1992 speech at Guildhall. Comcast’s stock Thursday was down 11%, Cable One’s 6.1%, and Shentel’s unchanged after hitting an intraday 52-week bottom. Comcast’s stock was also likely hurt by pessimistic guidance from leadership for the balance of 2025. “Management

made clear that they don't expect improvement in 1Q25, and they didn't promise any improvement after 1Q25. The message: the market is competitive; it is not likely to change; we are building a business around the reality that is," said **New Street Research analyst Jonathan Chaplin**. Comcast is the No. 1 U.S. ISP with about **31.8 million subscribers**. Trying to address the value end of the market that has been signing up for fixed wireless, Comcast charges \$30 a month for **NOW Internet**, which is an all-in price for 100 Mbps, with no contracts, free Wi-Fi gear, and unlimited data. Moffett thinks Comcast can turn things around, fueled by its ability to generate free cash flow to be returned to shareholders in the form of buybacks and dividends. "We rate Comcast [a] Buy with a target price of \$58" in 2025, Moffett said. Comcast closed yesterday at \$33.25. Neither Cable One nor Shentel has announced a date for their fourth quarter calls.



Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community





From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Cruz Expects Lutnick to be Confirmed as Commerce Secretary Next Week
Date: Thursday, February 6, 2025 7:51:26 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Cruz Expects Lutnick to be Confirmed as Commerce Secretary Next Week

AM Radio Bill Ready for Senate Floor Cruz's Panel OKs Capito USF Tweak Emily Barr: 'Shame' on CBS for Caving Bolton: Fiber's Troubles 'Misleading' Carr's Feb. 27 Agenda Starks in L.A.

TED HEARN
FEB 6 · [PREVIEW](#)



Lutnick: The **Senate Commerce Committee** voted along party lines yesterday to approve the nomination of **Cantor Fitzgerald Chairman and CEO Howard Lutnick** to be **Commerce Secretary** in the Trump administration. Lutnick, who still needs full Senate approval, will have a big role, along with **NTIA Administrator-designate Arielle Roth**, in repurposing the \$42.45 billion BEAD program that so far has failed to connect a single location to broadband service after more than three years as law. The Committee vote was 16-12, with **Sen. John Fetterman of Pennsylvania** as the only **Democrat** to support Lutnick. **Senate Commerce Committee Chairman Sen. Ted Cruz (R-Texas)** later said he expects Lutnick to be confirmed next week. The committee session included a tense debate over **Elon Musk's** role as head of the **Department of Government Efficiency (DOGE)** and

recent steps to take control of the Treasury Department’s central payments database and put nearly all staff of the U.S. Agency for International Development on leave. “It is difficult to sit here and hold a bipartisan markup when President Trump and Elon Musk and their **team of government arsonists** are blatantly violating the law, by withholding federal funds, seizing control of critical government systems and even proposing to eliminate all agencies by executive fiat,” said **Sen. Ed Markey (D-Mass.)**, who offered an amendment (which failed) designed to block Musk’s activities under certain conditions. “There is no branch of the federal government called Elon Musk,” Markey added. Cruz defended Musk. “This amendment, unfortunately, is nothing more than a clear, partisan political attack on Elon Musk, whom the President has tasked with running the department of government efficiency doge,” Cruz said, adding that Musk had “uncovered considerable waste” inside USAID. *(Continued after paywall.)*



From left: Sen. Edward Markey (D-Mass.) and Senate Commerce Committee Chairman Sen. Ted Cruz (R-Texas) at yesterday's vote on the nomination of Howard Lutnick to be Commerce Secretary

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



LIKE



COMMENT



RESTACK

© 2025 Ted Hearn
548 Market Street PMB 72296, San Francisco, CA 94104
[Unsubscribe](#)



From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: GOP Control of the FCC Starts Today
Date: Monday, January 20, 2025 7:49:59 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: GOP Control of the FCC Starts Today

NTIA OKs \$77K Per-Location BEAD Awards Maine Reports Free Starlink Numbers Ookla Gives S.C. Speed Praise Musk: Tuvalu Makes It 120 Countries for Starlink Altice, Nexstar Resolve Retrans Spat

TED HEARN
JAN 20 · [PREVIEW](#)



FCC: Brendan Carr – seven years a regular Commissioner – will step into his new role of **FCC Chairman** after Noon EST today. Job one for Carr, 46, is likely to help with restoring the FCC's authority to auction spectrum. "There's not even spectrum auction authority for the FCC right now, which is incredible when you think about wireless innovation being a leader of economic growth," former **FCC Chairman Ajit Pai** told **CNBC** last week. **Senate Commerce Committee Chairman Sen. Ted Cruz (R-Texas)** said he wants to help Carr by slipping auction authority into the pending reconciliation bill. Over in the House, an early reconciliation blueprint would call on Carr to lay the foundation to raise **\$60 billion from spectrum auctions** over the next 10 years. "I think Brendan Carr is going to be a superb Chairman. I worked very closely with him for many years and I know that he has both deep expertise in all of the issues as well as a determination to work hard to advance the ball in terms of American innovation and investment," Pai said. **President-elect**

Trump designated Carr his FCC Chairman last Nov. 17. For now, Carr can control the FCC's agenda but he won't have voting control in a policy making sense until **Republican Senate aide Olivia Trusty**, nominated last week by Trump, is confirmed by the Senate. In stepping into the top job at the FCC, Republican Carr from his time in the political minority can point to one achievement that no other FCC Commissioner **in modern agency history** can even come close to matching: Passing a novel communications law that disrupted U.S. superpower relations with China. Carr years ago identified an issue – **TikTok and U.S. national security** – and used social media and traditional media channels to amplify his concerns. In November 2021, Carr told Axios he supported an **outright U.S. ban** on TikTok. "I don't believe there is a path forward for anything other than a ban," he said. Last April, a politically divided Congress (a Democratic Senate and Republican House) took up Carr's cause and passed a law forcing TikTok to divorce its China parent or exit the U.S. market. **President Biden**, a Democrat, was all too happy to sign Carr's bill into law amid threats from Beijing. (See BBC's "*China says TikTok ban would 'come back to bite' the U.S.*") In part because of Carr's work on this issue, TikTok shut down in the U.S. Saturday night, only to come back about 18 hours later after **President Trump** intervened and proposed a deal that would give a U.S. entity 50% ownership of TikTok. "Americans deserve to see **our exciting Inauguration on Monday**, as well as other events and conversations," Trump said Sunday on **TruthSocial**. Trump, who joined 170 million U.S. TikTok users last June, has said TikTok helped him connect with young voters in his 2024 election victory. Surprises are certain to greet Carr, but some may create an opportunity or two to advance his long-held policy goals. Take the **Universal Service Fund**. If the **Supreme Court** effectively torpedoes the USF funding mechanism later this year, Congress would face the task of designing a new USF. Carr has been on record for years in support of requiring **Big Tech** to contribute revenue to the USF to expand the contribution base beyond tariffs on telephone bills. The Supreme Court just might create the opening Carr and allies have been looking for. "Big Tech has been enjoying a free ride on our Internet infrastructure while skipping out on the billions of dollars in costs needed to maintain and build that network," Carr said in a May, 2021 essay in **Newsweek**. "Yet Big Tech derives tremendous value from these high-speed networks."...

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community

 LIKE  COMMENT  RESTACK

© 2025 Ted Hearn
548 Market Street PMB 72296, San Francisco, CA 94104
[Unsubscribe](#)

From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Judge Pauses Trump Spending Freeze. What Happens to BEAD?
Date: Wednesday, January 29, 2025 7:56:57 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Judge Pauses Trump Spending Freeze. What Happens to BEAD?

Carr Helps Tower Builds Strand: T-Mobile-Starlink Not Disruptive
FSF's May Praises Cruz on Hotspots CRA Senate Bill Targets Foreign
FCC Licensees Trump Offers Buyouts to Federal Workers

TED HEARN
JAN 29 · [PREVIEW](#)



Freeze: Team Trump was looking like **Team Turmoil** yesterday. The **White House’s Office of Management and Budget** put out a notice late Monday (and a follow-up guidance Tuesday) about an immediate across-the-board spending freeze tied to recently signed Trump **Executive Orders**. For many in the telecom space, the big question was: Did the freeze put the **\$42.45 BEAD program on ice**? Some read OMB broadly, meaning BEAD money could still be clawed back. “Approximately **95.5% of the funding** still requires some level of approvals by [NTIA], and those funds would appear to be held up by this executive order, and are unlikely to make additional progress should Trump’s order remain in place,” said **Raymond James analyst Frank G. Louthan, IV** Wednesday morning. Scurrying for an answer became a moot issue after a **federal judge** Tuesday afternoon paused OMB’s

spending freeze until **Feb. 3.** at the request of a few non-profit litigants. In the hours leading up to **Judge Loren AliKhan’s** administrative stay, Democrats were making a huge fuss – which prompted an acerbic response from **Stephen Miller, White House Deputy Chief of Staff for Policy and Homeland Security Advisor.** “Trump’s decision to halt virtually all federal grants and loans is lawless, destructive, dangerous, and cruel. It is illegal. It is unconstitutional,” **Senate Majority Leader Chuck Schumer** said on his X feed Tuesday. **New York state Attorney General Letitia James** – who has sought Trump’s criminal prosecution since at least 2018 – promised to take the White House to court and did so in **U.S. District Court** in Rhode Island. “My office will be taking imminent legal action against this administration's unconstitutional pause on federal funding. We won't sit idly by while this administration harms our families,” James said Tuesday on her government X feed. **Commerce Secretary-designate Howard Lutnick** is to appear today before the **Senate Commerce Committee** for his confirmation hearing, where he will likely face a panel of troubled Democrats, including **Sen. Amy Klobuchar (Minn.),** who blasted the funding freeze and urged the White House to back down. “This unprecedented and unconstitutional move is causing chaos and jeopardizing critical support for everything from pediatric cancer research to equipment for our first responders,” she said in a statement. **Trump confidant Miller** took to his X feed to unload on **the media** and, by implication, the Democrats. “Welcome to the **first dumb media hoax** of 2025. OMB ordered a review of funding to [Non-Governmental Organizations], foreign governments and large discretionary contracts. It explicitly excluded all aid and benefit programs. **Leftwing media** outright lied and some people fell for the hoax,” Miller said.



National Council of Nonprofits et al. v...
263KB · PDF file

Download



N.Y. State v. Trump, 44-page PDF
433KB · PDF file

Download



OMB Memo Jan. 27, 2-page PDF
1010KB · PDF file

Download



OMB Follow Up Memo, 2 Page Pdf
207KB · PDF file

Download

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



© 2025 Ted Hearn
548 Market Street PMB 72296, San Francisco, CA 94104

[Unsubscribe](#)



From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Louisiana Gov. Pitches BEAD Reforms to Trump's Commerce Pick
Date: Friday, January 24, 2025 7:36:22 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Louisiana Gov. Pitches BEAD Reforms to Trump's Commerce Pick

CTIA: FWA Needs Spectrum ASAP Brent Bozell's Miracle Week in D.C. Verizon Added 373,000 FWA in Q4 Comcast Unveils \$70 News/Sports Online Package NaLA Survey Shows Post-ACP Hardship

TED HEARN
JAN 24 · [PREVIEW](#)



BEAD: Louisiana Gov. Jeff Landry (R) is telling **President Trump's** pick to run the **Commerce Department** that he wants to serve "as a thought partner and sounding board as you make necessary **reforms to NTIA and the Broadband Equity Access Deployment Program.**" In a letter Wednesday, Landry provided **Commerce Secretary-designate Howard Lutnik** with a list of reforms led by a change that would likely result in steering more money to **Elon Musk's Starlink** Internet service and allow ISPs to charge nearly **\$100 a month** as the low-cost option. NTIA should classify low Earth orbit satellite companies like Starlink and unlicensed fixed wireless "that can deliver qualifying broadband service as 'Reliable Broadband Services' and then eliminate the 'Alternative Technology' category," Landry said. On Jan. 13, NTIA gave the green light for Louisiana to begin spending

its \$1.3 billion in BEAD grant money. The vast majority — 95% — will fund fiber deployments. "However, in order to maximize efficient use [of] taxpayer dollars and ensure fit for purpose solutions statewide, we have strongly pursued a tech neutral solution, including specifically engaging with LEO satellite service providers in order to deliver universal coverage," Landry said. Landry informed Lutnick the first BEAD projects would begin construction within the first 100 days of the new Trump administration. Lutnick's [confirmation hearing](#) before the **Senate Commerce Committee** is set for **Wednesday, Jan. 29 at 10 a.m.** **Joe Kane**, director of broadband and spectrum policy at the **Information Technology & Innovation Foundation**, supports capping BEAD per-location costs at \$1,200, an approach designed to favor Starlink and perhaps fixed wireless over fiber. "The governor's suggestions would be a step in the right direction toward making BEAD a more effective tool to combat the digital divide," Kane told *Policyband*. "It's a good sign that Louisiana is using its BEAD experience to note the importance of tech neutrality and a streamlined program, as opposed to the current approach of overwhelming fiber preference and 'everything bagel' requirements that foist extraneous policy priorities on top of the main goal of closing the digital divide." In that connection, Landry said NTIA should abolish letter of credit requirements "so BEAD funds go to broadband deployment, not banks." One policy Landry didn't mention: Taxation. Under current law, BEAD grants are considered taxable income.



Gov. Jeff Landry Letter to Commerce Secr...

317KB · PDF file

Download

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.



Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



© 2025 Ted Hearn
548 Market Street PMB 72296, San Francisco, CA 94104
[Unsubscribe](#)



From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Lutnick to Take BEAD in a New Direction
Date: Thursday, January 30, 2025 7:25:29 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Lutnick to Take BEAD in a New Direction

T-Mobile Adds 428K FWA More on Alaska Fiber Break NAB Gets AM Radio Bill Groups Want TMUS-USM Conditions SAS to Add Starlink Comcast Lost 139K Broadband Subs in Q4 Turley at Free State

TED HEARN
JAN 30 · [PREVIEW](#)



Lutnick: Commerce Secretary-designate Howard Lutnick yesterday promised to take **the \$42.45 BEAD program** in a new direction, saying he would use the money efficiently and exclusively on broadband deployment projects. “Let’s do it efficiently and let’s do it swiftly, let’s use satellites, let’s use wireless and let’s use fiber. And let’s do it the cheapest, most efficiently we can, and I commit to working with you to make sure the states execute and deliver on the promise that Congress has made,” Lutnick said before the Senate Commerce Committee in a three hour-plus confirmation hearing. When asked by **Senate Majority Leader John Thune (R-S.D.)** if BEAD would focus on funding construction of broadband networks, Lutnick said, “Absolutely.” **Vice President JD Vance** arrived to introduce Lutnick to the panel just a few hours before OMB pulled its Monday memo viewed as an across-the-board spending freeze affecting programs like BEAD. Lutkin signaled that under

his command, Commerce is going to give close supervision to state funding applications with high per-location costs. “I expect the states to provide the most efficient way, the most cost efficient and effective way to get broadband to every house. I heard a story where they were planning **to run fiber for \$200,000 to a house that was worth \$125,000**. The waste of America is over in the Commerce Department,” he said.



From left: Vice President JD Vance, Howard Lutnick and
Jackey Rosen

Committee Democrats, including **Sen. Ed Markey (Mass.)**, **Jackey Rosen (Nev.)** and **Ben Ray Luján (N.M.)** a round of tense exchanges with Lutnick based on their concern that Commerce would actually not spend the BEAD money under orders from **President Trump**. In his questioning, Markey pressed Lutnick to “execute that law and spend the funding as it is written.” Lutnick replied, “It is my promise that I will try my best to give this Committee and the Congress the benefit of the bargain that you have passed.” NTIA recently approved Nevada’s BEAD awards, which included **\$77,000 per location** for 286 locations for **Beehive Broadband**. Rosen demanded that NTIA project Nevada’s approval. “Law are not simply suggestions from Congress,” she said. Lutnick replied, “I can commit to you that if it has been rigorously done and deeply efficient and it is the most efficient use to get broadband to your constituents, then it’s easy for me to commit to it,” Lutnick said. “You would not mind if we made it better.” Rosen insisted Nevada has already been approved and was about to begin building. Luján at times got emotional and raised his voice at times in demanding that Lutnick promise not to carry out an unlawful or unconstitutional order by Trump. “I work for [Trump],” Lutnick said. Luján replied, “Is your response that if the president asks you to cut broadband infrastructure funding that you will do that? Is that what I just heard.” Lutnick said, “Again, I work for the President of the United States and I’m here to execute his policies.” **Update:** Cruz announced Wednesday evening that his committee will vote on **Lutnick’s nomination on Feb. 5, 2025 at 10:00 a.m. EST...**

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community

 LIKE  COMMENT  RESTACK

© 2025 Ted Hearn
548 Market Street PMB 72296, San Francisco, CA 94104
[Unsubscribe](#)

From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Roth a Critic of BEAD's Fiber Spending and Rate Regulation
Date: Wednesday, February 5, 2025 7:37:48 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Roth a Critic of BEAD's Fiber Spending and Rate Regulation

Supino: Comcast Should Spin NBCU & Sky | Is Jeff Kagan Following Charter? | Rep. MTG Calls for PBS/NPR Hearing | FSF's Long Floats Zero Corporate Tax Rate | CTA to NAB: AM Radio Bill 'Luddite' Idea

TED HEARN
FEB 5 · [PREVIEW](#)



BEAD: If there's one thing to say about **Arielle Roth**, it is this: She definitely works for **Senate Commerce Committee Chairman Sen. Ted Cruz (R-Texas)**. Cruz on Monday said **President Trump** named his committee staffer Roth to head the **National Telecommunications and Information Administration**, where she can make adjustments to the troubled **\$42.45 billion BEAD program** charged with connecting millions of unserved locations but so far has done so for not a one. Last June, Roth at a **Federalist Society** event [gave her take](#) on problems with the BEAD program and not surprisingly she sounded a lot like her boss Cruz. "Instead of prioritizing connecting all Americans who are currently unserved to broadband, the **NTIA** has just been preoccupied with attaching all kinds of extra-legal requirements on BEAD and, honestly, **a woke social agenda** loading up all kinds of burdens that deter participation in the program and drive up costs actually," Roth said. It looks as if ridding BEAD of its excessive reliance on fiber spending will be a top priority for

her. “Congress wrote the [Infrastructure Investment and Jobs Act] in a tech-neutral manner,” Roth said. “Any technology could be eligible for BEAD subsidies provided that they met the performance requirements in the statute,” she said. “Instead, NTIA has gone in a totally different direction and imposed **extreme tech bias in favor of fiber** in the BEAD program. That’s just going to make the program more expensive. A one-size-fits-all solution doesn’t make sense.” *(Continued after paywall.)*



NTIA Administrator-designate Arielle Roth speaking at the Federalist Society on June 11, 2024...

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



© 2025 Ted Hearn
548 Market Street PMB 72296, San Francisco, CA 94104
[Unsubscribe](#)



From: [Ted Hearn from Policyband](#)
To: [Sweet, Kristina \(she/her\)](#)
Subject: D.C. Memo: Texas Wants to Kill BEAD's Low-Cost Option Mandate
Date: Monday, February 10, 2025 7:25:45 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Forwarded this email? [Subscribe here](#) for more



D.C. Memo: Texas Wants to Kill BEAD's Low-Cost Option Mandate

Sen. Sullivan: Starlink 'Not Reliable' in Alaska Copper Theft Explodes In Fort Worth Montana Broadband Head: Starlink a 'Luxury Option'
Sens. Scott, Paul Want to Stop Major Rules

TED HEARN
FEB 10 · [PREVIEW](#)



BEAD: The top broadband official in **Texas** wants **NTIA** to make a big change to the **\$42.45 billion BEAD** program: Kill the requirement forcing ISPs to offer a **low-cost broadband service option**. “This requirement is viewed as running counter to [the] legislative mandate against rate regulation. Removing this requirement may increase overall provider participation and support efficient deployment of funds,” said **Texas Comptroller of Public Accounts Glenn Hegar** in a Feb. 6 letter to **Senate Commerce Committee Chairman Sen. Ted Cruz (R-Texas)**. “Removing the low-cost service option would also reduce the administrative burden placed on [State Broadband Offices] to identify ‘eligible households’ and monitor subgrantee’s compliance with the requirement.” Texas is expecting to collect **\$3.3 billion** in BEAD grant dollars after it became the last state to receive NTIA approval to begin funding BEAD projects. “Regrettably, NTIA's approval process was unnecessarily protracted, requiring **numerous revisions over an 11-month period**,” Hegar said.

(Continued after paywall.)



Texas Comptroller of Public Accounts Glenn Hegar...

Subscribe to Policyband to unlock the rest.

Become a paying subscriber of Policyband to get access to this post and other subscriber-only content.

Upgrade to paid

A subscription gets you:

- Subscriber-only posts and full archive
- Post comments and join the community



© 2025 Ted Hearn

548 Market Street PMB 72296, San Francisco, CA 94104

[Unsubscribe](#)



From: [Jennifer Zarek](#)
To: [Monsarrat, Alexei](#)
Cc: [Sweet, Kristina \(she/her\)](#)
Subject: E-signature demo
Date: Wednesday, January 29, 2025 11:00:42 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Alexei,

I used your email in our session today to demonstrate the e-signature tool inside of AmpliFund. You will have received an email about signing a BEAD agreement. You can ignore it or run through the process. Sorry to spam you!

Thanks,

Jennifer Zarek, CGMS
Implementation Team Lead
o. (216) 377-5500 ext. 1001
e. jzarek@amplifund.com
www.amplifund.com
Pronouns: she/her/hers

NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION FACT SHEET

State Digital Equity Capacity Grant Program

Subrecipients and Contractors

Recipients (States/Territories) may work with subrecipients and contractors (vendors) for assistance throughout the course of the awarded projects in alignment with Budget and Specific Project details, statutory and NOFO requirements. The roles of each entity in a Federal assistance award are as follows:

- A **subrecipient** is involved in the substantive activities of the awarded project to implement digital equity projects and accomplish program objectives. Terms and conditions from the grant award flow down to the subrecipient.
- A **contractor** provides goods and services to benefit the grant recipient. A contractor does not seek to accomplish a public benefit; rather, it pursues its own commercial objectives.

SUBRECIPIENT AND CONTRACTOR DETERMINATIONS ([2 CFR 200.331](#))

Use the checklist below to help determine whether grant payments expected to be made to a project participant constitute a subaward or a payment for goods and services. Please also see the DE Capacity Grant Agreements Checklist.

SUBRECIPIENT

Characteristics that may indicate that an entity is a subrecipient include:

- Determines who is eligible to receive Federal financial assistance.
- Has its performance measured against whether the objectives of the Federal program are met.
- Has responsibility for programmatic decision making.
- Has responsibility for adherence to applicable Federal program compliance requirements.
- Uses the Federal funds to carry out a program of the organization as compared to providing goods or services for a program of the recipient.

CONTRACTOR

Characteristics that may indicate an entity is a contractor include:

- Provides the goods and services within normal business operations.
- Provides similar goods or services to many different purchasers.
- Operates in a competitive environment, subject to procurement requirements.
- Provides goods or services that are ancillary to the operation of the Federal program.
- Is not subject to compliance requirements of the Federal program.

WHAT NEEDS TO BE PRESENT IN A SUBAWARD? ([2 CFR 200.332](#))

Recipients ensure that every subaward is clearly identified to the subrecipient as a subaward (as opposed to a contract) and includes the following Federal award identification information at the time the subaward is made:

- Subrecipient name (which must match the name associated with its unique entity identifier)
- Subrecipient's unique entity identifier
- Federal Award Identification Number (FAIN)
- Federal Award Date of award to the recipient by the Federal agency
- Subaward Period of Performance Start and End Date
- Subaward Budget Period Start and End Date
- Amount of Federal Funds Obligated by this action by the recipient to the subrecipient
- Total Amount of Federal Funds Obligated to the subrecipient by the recipient including the current financial obligation
- Total Amount of the Federal Award committed to the subrecipient by the recipient
- Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)
- Name of Federal awarding agency, recipient, and contact information for awarding official of the recipient
- Assistance Listings number and Title: The recipient must identify the dollar amount made available under each Federal award and the Assistance Listings Number at time of disbursement
- Identification of whether the award is R&D
- Indirect cost rate for the Federal award (including if the de minimis rate is charged)

NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION FACT SHEET

State Digital Equity Capacity Grant Program

Subrecipient Monitoring ([2 CFR § 200.332](#))

SUBRECIPIENT RISK ASSESSMENT

Recipients must evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions. Recipients should consider the following:

- The subrecipient's prior experience with the same or similar subawards
- The results of previous audits, including whether the subrecipient receives a Single Audit in accordance with Subpart F, and the extent to which the same or similar subawards have been audited as a major program
- Whether the subrecipient has new personnel or new or substantially changed systems
- The extent and results of any Federal agency monitoring (e.g., if the subrecipient also receives Federal awards directly from the Federal agency).

If appropriate, recipients may also consider implementing specific conditions in a subaward (as described in [2 CFR § 200.208](#)) and notify the Federal agency of the specific conditions.

SUBRECIPIENT MONITORING

Recipients must monitor the activities of the subrecipient as necessary to ensure that the subrecipient complies with Federal statutes, regulations, and the terms and conditions of the subaward. In monitoring a subrecipient, a pass-through entity must:

- Review financial and performance reports
- Ensure that the subrecipient takes corrective action on all significant developments that negatively affect the subaward
- Issue a management decision for audit findings pertaining only to the Federal award provided to the subrecipient from the pass-through entity as required by [2 CFR § 200.521](#)
- Resolve audit findings specifically related to the subaward

Recipients may choose to take additional actions to ensure subrecipient compliance depending upon the recipient's assessment of risk posed by the subrecipient. The following monitoring tools may be useful for the Recipient to ensure proper accountability and compliance with program requirements and achievement of performance goals:

- Providing subrecipients with training and technical assistance on program-related matters.
 - Performing site visits to review the subrecipient's program operations.
 - Arranging for agreed-upon-procedures and engagements and establishing standard operating procedures for subrecipient activities.
-

SUBRECIPIENT AUDIT REQUIREMENTS

The Recipient is responsible for verifying that every subrecipient is audited as required by [Subpart F of 2 CFR Part 200](#) when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the Single Audit threshold of \$1,000,000.

NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION FACT SHEET

State Digital Equity Capacity Grant Program

Specific Award Conditions

WHAT ARE SACS?

Specific Award Conditions (SACs) are standardized terms of Federal awards supporting project execution, grant administration, and regulatory compliance. SACs are established by the Program and Grants Offices and must be followed by all recipients. While there are some general SACs applicable to all grant recipients, some recipients may have additional SACs imposed depending on administrative burdens and project complexity. Examples of SACs include, but are not limited to:

- Period of performance and funding limitations
- Department of Commerce Financial Assistance Standard Terms and Conditions
- Incorporation of the Notice of Funding Opportunity
- Reporting Requirements and Timeline
- Negotiate in Good Faith: Mandates that recipients must negotiate in good faith with all requesting parties (e.g., public, private, non-profit, etc.)
- Build America, Buy America Act (BABA) Provision or Domestic Preferences for Procurements: Recipients must, to the greatest practical extent, provide a preference for materials, goods, and services produced in the United States.
- Contracting with Small and Minority Businesses, Women's Business Enterprises, and Labor Surplus Area Firms: Recipients must take affirmative steps to ensure that small and minority owned-businesses, women-owned businesses, and labor surplus area firms are used whenever possible.

DO ALL RECIPIENTS HAVE THE SAME SACS?

No, not all recipients will have the same SACs. Though most SACs will be consistent across a grant program, some will be specific to certain subsets of awards or to certain recipients. For example, all recipients will have to comply with SACs such as Negotiate in Good Faith and Buy American. The Program and Grants Offices determine recipient-specific SACs during the application review phase. These SACs will be communicated in the award document.

WHERE CAN RECIPIENTS FIND SACS THAT APPLY TO THEIR AWARD?

Recipients should consult their CD-450 to determine the full spectrum of SACs that apply to their project. If recipients have any questions about SACs, they should contact their FPO.

HOW DO RECIPIENTS REMAIN SAC COMPLIANT?

To remain compliant with SACs, recipients should:

- Read and understand the SACs associated with your award (read your CD-450)
- Ensure that your organization has adequate policies and procedures to verify and validate compliance. If not, establish procedures to monitor compliance with SACs.
- Always maintain records, written communications, and correspondence with the FPO and Grants Office.

The FPOs and Grants Specialists will continue to monitor programmatic and regulatory compliance. If recipients deviate from the SACs, the FPO and/or Grants Office may implement corrective actions to bring delinquent recipients into compliance.

NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION FACT SHEET

State Digital Equity Capacity Grant Program

Subawards

WHAT TYPES OF ORGANIZATIONS CAN RECEIVE A SUBAWARD?

Grantees can use State Digital Equity Capacity Grant Funds for three purposes: 1) assist in the implementation of the State Digital Equity Plan of the State; 2) pursue digital inclusion activities in the State consistent with the State Digital Equity Plan of the State; and 3) report to the State regarding the digital inclusion activities of the entity (Section 60304(e), Infrastructure Act).



If the Administering Entity or Organization (AE/AO) for a State/Territory makes a subgrant described above, the AE/AO shall, with respect to the subgrant, provide to the State the assurances required under **Section 60304(e) of the Infrastructure Act**.

From: [Hallquist, Christine](#)
To: [Aguayo, Jose](#); [Watson, Britaney](#); [Clithero, Toni H](#); [Fish, Robert](#); [Herzog, Herryn](#); [Ledoux, JB](#); [Fortier, Lucie](#); [Matthews, Alissa](#); [Monsarrat, Alexei](#); [Raboin, Ginny](#); [Sweet, Kristina \(she/her\)](#)
Cc: [Johnson, Kerrick](#); [Flint, Carol](#); [Farnham, Douglas](#)
Subject: FW: {SHLB} Further clarification
Date: Tuesday, January 28, 2025 3:00:36 PM
Attachments: [OMB Clarification Memo.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

With warm regards,
Christine Hallquist
Executive Director
christine.hallquist@vermont.gov
(802)636-7853
[Vermont Community Broadband Board](#)



From: John Windhausen <jwindhausen@shlb.org>
Sent: Tuesday, January 28, 2025 2:58 PM
To: SHLB <shlb@shlb.org>
Subject: {SHLB} Further clarification

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hi SHLB Members,

OMB just issued the attached clarification of yesterday's "pause" memo. This new second memo released in the last hour suggests the first "pause" does NOT apply to the Universal Service Fund programs. It might not even apply to BEAD, Digital Equity Act or CPF. It says the "pause" only applies to those programs covered by the specific Executive Orders listed in the second memo. maybe phew! Stay tuned.

SHLB issued a press statement calling for clarification, and then an hour later, OMB did!

Best,
John

--

Executive Director

John Windhausen



Bridging the digital divide
one anchor institution at a time.

202-256-9616

jwindhausen@shlb.org



--

You received this message because you are subscribed to the Google Groups "SHLB" group.

To unsubscribe from this group and stop receiving emails from it, send an email to shlb+unsubscribe@shlb.org.

To view this discussion visit

https://groups.google.com/a/shlb.org/d/msgid/shlb/CAM8zxLsPn3Tyks-3VqoxUpQGkdLaGQcoT_BQzh8tj60BQwQL%2Bg%40mail.gmail.com.

From: [Skleres, Mitchell](#)
To: jburt@amplifund.com
Cc: [Sweet, Kristina \(she/her\)](#); [Monsarrat, Alexei](#); [Wade, Jen](#)
Subject: FW: AmpliFund VCBB Portal Requirements
Date: Tuesday, February 4, 2025 4:47:23 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hello James,

My apologies for not including you in my original email, I did not think about doing so. I emailed Jennifer on Friday requesting some documentation on AmpliFund build for us to support VCBB with testing of the application and review portal. Please see my original email below and let me know if you have any questions I can further clarify.

Thanks,

Mitchell Skleres
Process, Risk & Controls Consultant
Public Sector

RSM US LLP
250 West Street, Suite 200, Columbus, Ohio, 43215
D: 614.456.2775 | **E:** Mitchell.Skleres@rsmus.com | **W:** www.rsmus.com



From: Skleres, Mitchell
Sent: Friday, January 31, 2025 3:54 PM
To: [jzarek <jzarek@amplifund.com>](mailto:jzarek@amplifund.com)
Cc: [Wade, Jen <Jen.Wade@rsmus.com>](mailto:Jen.Wade@rsmus.com); [Robbins, Kaycee <Kaycee.Orourke@rsmus.com>](mailto:Kaycee.Orourke@rsmus.com); [Bender, Maggie <Maggie.Bender@rsmus.com>](mailto:Maggie.Bender@rsmus.com)
Subject: AmpliFund VCBB Portal Requirements

Good afternoon Jennifer,

Alexei mentioned that we could reach out directly to touch base on the system requirements and tracking documentation that your team has developed around the build for VCBB. Currently, we have the following documents that were provided by your team:

- BEAD Full Proposal Review, Scoring, and Negotiation - VCBB edits v1.docx

- VT-BEAD RFA Clean Final - posted 11.8.24.pdf
- VCBB-Vermont Public Service_Grant Maker Pre-Award Design v3.pdf
- VCBB BEAD Opportunity Workflow.xlsx
- Vermont VCBB_User Acceptance Testing_Grant Maker – Pre_Award.xlsx

We are wondering if your team has developed any additional documentation around the requirements of the portal such as an application questions file containing the application section, question number, response type, response options, and dependency logic of the questions. Or any other specific documentation containing the requirements of the review process that does not exist in the opportunity workflow documents. We are hoping to gather as much information as possible to better understand the logic that was built so we can hit the ground running on supporting the UAT efforts for the portal.

Lastly, I was hoping you may be able to add Kaycee Robbins, who is cc'd on this email as a user in AmpliFund with the same permissions that Maggie and I were set up with. She will be assisting our team with the VCBB efforts going forward. Thank you in advance for all your assistance throughout this process!

Sincerely,

Mitchell Skleres
Process, Risk & Controls Consultant
Public Sector

RSM US LLP
250 West Street, Suite 200, Columbus, Ohio, 43215
D: 614.456.2775 | E: Mitchell.Skleres@rsmus.com | W: www.rsmus.com



NOTICE: This e-mail is only intended for the person(s) to whom it is addressed and may contain confidential information. Unless stated to the contrary, any opinions or comments are personal to the writer and do not represent the official view of RSM US LLP or any of its affiliates (RSM US). If you have received this e-mail in error, please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

Any advice or information in the body of this email is subject to, and limited by, the terms in the applicable engagement letter or statement of work, including provisions regarding tax advice. RSM US is not responsible for, and no person should rely upon, any advice or information in the body of this email unless such advice or information relates to services contemplated by an engagement letter or statement of work in effect between such person and RSM US.

BEAD Potential Subrecipient Support Grant Program

Program Goals

- To ensure all types of eligible providers¹ have the ability to compete in the Vermont Broadband Equity, Access, and Deployment (BEAD) program.
- To encourage collaboration among potential subrecipients to promote the efficient expenditure of grant funding. This can lower costs and promote great oversight and accountability.
- To encourage planning in expectation of the subrecipient selection process raising the quality of applications received.
- To raise the caliber of the applications received during the BEAD subrecipient selection process.
- To gather information to inform the implementation of the program from key stakeholders.
- The project will (1) seek to evaluate as many of the addresses in the 51 towns of NEK Broadband as possible to determine if they are all indeed BSLs and if so what options exist for providing service; (2) create a high level design to the addresses not currently designed; (3) identify what design changes to the existing design would be needed to make the project more climate resilient as well as a projected cost to make those design changes; (4) a plan for how to get the BEAD application process completed; (5) build a budget for the BEAD application, including route miles etc; (6) undertake work for securing a letter of credit or performance bond; (7) work related to cyber security to prepare the organization to meet BEAD requirements; (8) work related to environmental and historic requirements.

Allowable Activities

Allowable activities are limited to planning and pre-deployment activities as specified in the Broadband Equity, Access, and Deployment Program [Notice of Funding Opportunity](#) (BEAD NOFO) published by the National Telecommunications and Information Administration (NTIA), U.S. Department of Commerce (See **Request for Initial Planning Funds**, p. 24–25).

¹ “Eligible provider” is defined in Vermont Act 71 of 2021 as (a) a communications union district, (b) a small communications carrier, or (c) an Internet service provider working in conjunction with a communications union district to expand broadband service to unserved and underserved locations as part of a plan to achieve universal broadband coverage in the district.

Ineligible Costs

Funding may not be used for the following:

- Construction
- Materials
- Pole licenses
- Make-ready expenses
- Applications for financing
- General operational expenses of the applicant
- Costs not related to participation in the Vermont BEAD Program
- Other ineligible costs as specified in the [BEAD NOFO](#) (See Ineligible Costs, p. 82).

Project Template

Applicant

NEK Community Broadband dba CVFiber dba NEKCV

Project Title

CV BEAD Prep

Project Purpose and Evaluation

Describe how your project will help you to achieve one or more of the BEAD Potential Subrecipient Support Grant Program goals.

- The funding will help us plan for the BEAD subrecipient selection process, gather the information required regarding addresses, costs to serve, and community needs which will ultimately raise the quality and caliber of our application. The first allowable cost listed in the BEAD NOFO for the planning and pre-deployment funding is “research and data collection”. NEKCV has 61% of the un- and underserved addresses in BEAD (53% of the unserved and 68% of the underserved).

List the specific objectives of your project. What will your project accomplish?

- The project will (1) seek to evaluate as many of the addresses in the 51 towns of NEK Broadband as possible to determine if they are all indeed BSLs and if so what options exist for providing service; (2) create a high level design to the addresses not currently designed in order to create a budget for the BEAD application; (3) identify what design changes to the existing design would be needed to make the project more climate resilient as well as a projected cost to make those design changes in order to create a budget for the BEAD application; (4) a plan for how to get the BEAD application process completed; (5) build a

budget for the BEAD application, including route miles etc; (6) undertake work for securing a letter of credit or performance bond; (7) work related to cyber security to prepare the organization to meet BEAD requirements, to the degree necessary to be completed before the budget; (8) work related to environmental and historic requirements because they can have major impacts on design and developing budget for the application.

Describe how you will evaluate the success of your project using qualitative and quantitative measures.

- Quantitative: (1) we have a proposed design plan for each address that enables us to have a detailed budget for the entire BEAD project;
- Qualitative: We are in a position to meet the qualification requirements of the BEAD application for cyber security, environmental, and workforce. This is not post award work it is the work needed to prepare the application.

List the specific deliverables of your project.

- List of addresses to challenge
- List of addresses to include in the preapplication submission
- Miles to addresses in design to create budget for the application
- Miles to add to increase climate resilience in order to create the budget and identify what climate resilience work we might put in place to specifically address one of the questions in the application.
- Miles to addresses not currently in design and determining how to deal with off-grid addresses in order to create a budget for BEAD.
- Mapping transfer work in order to have the ability to identify costs in any given area to create the budgets for the proposal and meet VCBB preference for more detailed cost by address information by putting a design into a mapping system that lets us identify labor code and material costs by any given boundary that we draw in. We are moving to a different engineer in order to properly prepare for BEAD and this is critical to getting the answers to a climate resilient design and budget questions.
- Ensure we understand the costs to comply with the BEAD rules in order to adequately create the budget. This is not about ensuring compliance with a BEAD project, this is about creating a budget for the BEAD application of what it will cost to comply.
- Preparation work for the application process
- Budget and Compliant Business Model and Plan - updating the business model with all of the information and data that is collected from the above deliverables in how we actually come to a budget number for BEAD.
- Compliance plan is how we determine the costs for the plan to put in the business model.

Budget

Budget Summary

Cost Category	Funds Requested
Personnel	\$36,708
Fringe Benefits	\$15,732
Travel	\$1,500
Equipment	
Supplies	
Contractual/Consultant	\$91,660
Other Direct Costs	
Total	\$ 145,600

Budget Narrative

Personnel

If you are requesting personnel costs, describe the positions funded (name and title), unit cost (hourly or salary), level of effort (hours or percent full time equivalent), and why these costs are necessary to meet the objectives of your project.

Timeline: September 2024 to April 2025

Name and Title	Salary	Level of Effort	Meet Objectives
<i>Erik Townsend, GIS Specialist and Project Manager</i>	\$88k	10-40% 16 weeks * 4 hours * \$42 = \$2,688 plus 12 weeks * 16 hours * \$42 = \$8,064	Create an app for people to enter information for off-grid BSLs. Evaluate said work. Work with design firm to create solutions to addresses. Do mileage and passing analysis.
<i>Donna Ransmeier, Grant Manager</i>	\$80k	20% 12 weeks * 8 hours * \$38.5 = \$3,696	Review all BEAD rules, notices, work with partners and vendors to identify costs for budget. Coordinate with network operator and IT Consultant on cyber-security
Lucas Stubbs	\$92k	90%	Nearly 100% of Lucas's time has

	until 10/1 then \$33/hr	\$44*36 hours*6 weeks=\$9,504 \$33*36 hours *13 weeks= \$15,444	been evaluating sites for BEAD primarily in the CVFiber area and some in southern NEK area.
--	----------------------------------	---	---

Fringe Benefits

If you are requesting fringe benefit costs for positions described above, provide the fringe benefit rate or total fringe costs.

Salary is 70% and benefits and payroll taxes are 30% of the total overall costs. So a salary amount of \$36,708k / 70% results in \$15,732 in fringe benefit costs.

Travel

If you are requesting travel costs, provide a breakdown of how you calculated these costs and the purpose of each trip.

\$2,500 - Mileage for board members and staff to visit over 400 sites. 2024 mileage rate of \$0.67 and 2025 mileage rate of \$0.70.

Equipment

If you are requesting equipment costs, provide a breakdown of how you calculated these costs and why they are necessary to meet the objectives of your project.

Supplies

If you are requesting supplies costs, provide a breakdown of how you calculated these costs and why they are necessary to meet the objectives of your project.

Contractual/Consultant

If you are requesting contractual costs, provide a basis for the cost of each contract planned, the specific work the contractor will complete, and a detailed justification of why these costs are necessary to meet the objectives of your project. Include contractor names if already selected.

CNE - \$25,000

Timeline: August 2024 to April 2025

Deliverables and justification:

- (1) *Cost benefit analysis* of whether to change existing design to accommodate serving EVERY address in accordance with BEAD in a more cost effective manner than existing design.

- (2) *Determination of cost* for detailed design to be conducted when BEAD occurs. Need before BEAD for budget estimates.
- (3) *Evaluate and create high level design to nearly 1,000 off-grid / challenging addresses* and determine if possible to serve with fiber or if a secondary solution will be required and what the most cost effective approach will be.
- (4) *Complete a high level design* (not the detailed design) that incorporates the decisions from above in order to create the budget necessary to apply for BEAD.

Innovative - \$20,000

Timeline: December 2024 to February 2025

Deliverables and justification:

1. Convert the mapping system from one format into another in order for CNE to do the work above of creating the high level design and doing cost estimates.
2. The VT-BEAD RFA asks for the ability to identify costs per address which we are unable to determine under our current design maps - so the conversion to the relation map enables us to do a more detailed budget for the BEAD application for at least groups of addresses and enables us to evaluate costs for the BEAD application.

Desai Management - \$21,660

Timeline: August 2024 to April 2025

Deliverables and Justification:

1. Capacity to project manage BEAD application project. Deliverables include smartsheets, meeting minutes, vendor management.
2. Budget development work to take the statistical information from the work that CNE does in the Innovative map and convert it into information that can be used in the JSI business model.
3. Coordinate site visitation work through project management. Sites need to be visited in order to determine (a) if real BSLs; (b) what strategy to take to serve; (c) cost to serve for the budget.

JSI - \$5,000

Timeline: August 2024 to April 2025

Deliverables and Justification: Business model that allows for different scenarios in order to meet the request of the RFA to understand costs for different addresses and the ability to problem solve for solutions on how to get to addresses where the model indicates the cost is high. With 61% of the addresses across 71 towns with areas that are partially served and areas that are not, with off grid addresses, and the integration with other funding sources, we need a more sophisticated business model in order to develop cost of the BEAD project and create the cashflow projections and the model

itself that meets the requirements of the BEAD RFA for the application. Must be done prior to BEAD in order to know the budget for BEAD and to answer the questions in the application.

EBI - \$20,000

Timeline: January 2025 to March 2025

Deliverables and Justification: NEPA evaluation and report for submission with BEAD application to determine if categorical exclusion will apply or if there are design changes that can mitigate environmental impact. Needed to determine cost of compliance, whether redesign will be necessary and what associated cost.

BEAD Potential Subrecipient Support Grant Program

Program Goals

- To ensure all types of eligible providers¹ have the ability to compete in the Vermont Broadband Equity, Access, and Deployment (BEAD) program.
- To encourage collaboration among potential subrecipients to promote the efficient expenditure of grant funding. This can lower costs and promote great oversight and accountability.
- To encourage planning in expectation of the subrecipient selection process raising the quality of applications received.
- To raise the caliber of the applications received during the BEAD subrecipient selection process.
- To gather information to inform the implementation of the program from key stakeholders.
- The project will (1) seek to evaluate as many of the addresses in the 51 towns of NEK Broadband as possible to determine if they are all indeed BSLs and if so what options exist for providing service; (2) create a high level design to the addresses not currently designed; (3) identify what design changes to the existing design would be needed to make the project more climate resilient as well as a projected cost to make those design changes; (4) a plan for how to get the BEAD application process completed; (5) build a budget for the BEAD application, including route miles etc; (6) undertake work for securing a letter of credit or performance bond; (7) work related to cyber security to prepare the organization to meet BEAD requirements; (8) work related to environmental and historic requirements.

Allowable Activities

Allowable activities are limited to planning and pre-deployment activities as specified in the Broadband Equity, Access, and Deployment Program [Notice of Funding Opportunity](#) (BEAD NOFO) published by the National Telecommunications and Information Administration (NTIA), U.S. Department of Commerce (See **Request for Initial Planning Funds**, p. 24–25).

¹ “Eligible provider” is defined in Vermont Act 71 of 2021 as (a) a communications union district, (b) a small communications carrier, or (c) an Internet service provider working in conjunction with a communications union district to expand broadband service to unserved and underserved locations as part of a plan to achieve universal broadband coverage in the district.

Ineligible Costs

Funding may not be used for the following:

- Construction
- Materials
- Pole licenses
- Make-ready expenses
- Applications for financing
- General operational expenses of the applicant
- Costs not related to participation in the Vermont BEAD Program
- Other ineligible costs as specified in the [BEAD NOFO](#) (See Ineligible Costs, p. 82).

Project Template

Applicant

NEK Community Broadband dba NEK Broadband dba NEKCV

Project Title

NEK BEAD Prep

Project Purpose and Evaluation

Describe how your project will help you to achieve one or more of the BEAD Potential Subrecipient Support Grant Program goals.

- The funding will help us plan for the BEAD subrecipient selection process, gather the information required regarding addresses, costs to serve, and community needs which will ultimately raise the quality and caliber of our application. The first allowable cost listed in the BEAD NOFO for the planning and pre-deployment funding is “research and data collection”. NEKCV has 61% of the un- and underserved addresses in BEAD (53% of the unserved and 68% of the underserved).

List the specific objectives of your project. What will your project accomplish?

- The project will (1) seek to evaluate as many of the addresses in the 51 towns of NEK Broadband as possible to determine if they are all indeed BSLs and if so what options exist for providing service; (2) create a high level design to the addresses not currently designed in order to create a budget for the BEAD application; (3) identify what design changes to the existing design would be needed to make the project more climate resilient as well as a projected cost to make those design changes in order to create a budget for the BEAD application; (4) a plan for how to get the BEAD application process completed; (5) build a

budget for the BEAD application, including route miles etc; (6) undertake work for securing a letter of credit or performance bond; (7) work related to cyber security to prepare the organization to meet BEAD requirements, to the degree necessary to be completed before the budget; (8) work related to environmental and historic requirements because they can have major impacts on design and developing budget for the application.

Describe how you will evaluate the success of your project using qualitative and quantitative measures.

- Quantitative: (1) we have a proposed design plan for each address that enables us to have a detailed budget for the entire BEAD project;
- Qualitative: We are in a position to meet the qualification requirements of the BEAD application for cyber security, environmental, and workforce. This is not post award work it is the work needed to prepare the application.

List the specific deliverables of your project.

- List of addresses to challenge
- List of addresses to include in the preapplication submission
- Miles to addresses in design to create budget for the application
- Miles to add to increase climate resilience in order to create the budget and identify what climate resilience work we might put in place to specifically address one of the questions in the application.
- Miles to addresses not currently in design and determining how to deal with off-grid addresses in order to create a budget for BEAD.
- Mapping transfer work in order to have the ability to identify costs in any given area to create the budgets for the proposal and meet VCBB preference for more detailed cost by address information by putting a design into a mapping system that lets us identify labor code and material costs by any given boundary that we draw in. We are moving to a different engineer in order to properly prepare for BEAD and this is critical to getting the answers to a climate resilient design and budget questions.
- Ensure we understand the costs to comply with the BEAD rules in order to adequately create the budget. This is not about ensuring compliance with a BEAD project, this is about creating a budget for the BEAD application of what it will cost to comply.
- Preparation work for the application process
- Budget and Compliant Business Model and Plan - updating the business model with all of the information and data that is collected from the above deliverables in how we actually come to a budget number for BEAD.
- Compliance plan is how we determine the costs for the plan to put in the business model.

Budget

Budget Summary

Cost Category	Funds Requested
Personnel	\$20,000 (only direct data gathering or analysis)
Fringe Benefits	\$8,570
Travel	\$1,500
Equipment	\$0
Supplies	\$0
Contractual/Consultant	\$168,430
Other Direct Costs	
Total	\$ 200,000.00

Budget Narrative

Personnel

If you are requesting personnel costs, describe the positions funded (name and title), unit cost (hourly or salary), level of effort (hours or percent full time equivalent), and why these costs are necessary to meet the objectives of your project.

Timeline: September 2024 to April 2025

Name and Title	Salary	Level of Effort	Meet Objectives
<i>Erik Townsend, GIS Specialist and Project Manager</i>	\$88k	20%-50% 16 weeks * 8 hours * \$42 = \$5,376 plus 12 weeks * 20 hours * \$42 = \$10,080	Create an app for people to enter information for off-grid BSLs. Evaluate said work. Work with design firm to create solutions to addresses. Do mileage and passing analysis
<i>Donna Ransmeier, Grant Manager</i>	\$80k	20% 12 weeks * 8 hours * \$38.5 = \$3,696	Review all BEAD rules, notices, work with partners and vendors to identify costs for budget. Coordinate with network operator and IT Consultant on cyber-security
Tom Halligan	\$23	20% 8 weeks * 8 hours * \$23 = \$1,472	Evaluating sites for BEAD
Kitty Ufford-Chase	\$78k	5% 4weeks * 20 hours * \$37.5 =	Evaluating Sites for BEAD with board members

		\$3,000	
Owen Carr	\$23	20% 8 weeks * 8 hours * \$23 = \$1,472	Evaluating Sites for BEAD

Fringe Benefits

If you are requesting fringe benefit costs for positions described above, provide the fringe benefit rate or total fringe costs.

Salary is 70% and benefits and payroll taxes are 30% of the total overall costs. So a salary rate of \$20k / 70% results in \$8,570 in fringe benefit costs.

Travel

If you are requesting travel costs, provide a breakdown of how you calculated these costs and the purpose of each trip.

4,500 miles: Mileage for board members and staff to visit over 1,100 sites. 2024 mileage rate of \$0.67 and 2025 mileage rate of \$0.70 . Update: many board members did not submit for reimbursement so reducing this amount.

Equipment

If you are requesting equipment costs, provide a breakdown of how you calculated these costs and why they are necessary to meet the objectives of your project.

Supplies

If you are requesting supplies costs, provide a breakdown of how you calculated these costs and why they are necessary to meet the objectives of your project.

Contractual/Consultant

If you are requesting contractual costs, provide a basis for the cost of each contract planned, the specific work the contractor will complete, and a detailed justification of why these costs are necessary to meet the objectives of your project. Include contractor names if already selected.

JSI - \$20,000

Timeline: August 2024 to April 2025

Deliverables and Justification: Business model that allows for different scenarios in order to meet the request of the RFA to understand costs for different addresses and the ability to problem solve for solutions on how to get to addresses where the model indicates the cost is high. With 61% of the addresses across 71 towns with areas that are partially served and areas that are not, with off grid addresses, and the integration

with other funding sources, we need a more sophisticated business model in order to develop cost of the BEAD project and create the cashflow projections and the model itself that meets the requirements of the BEAD RFA for the application. Must be done prior to BEAD in order to know the budget for BEAD and to answer the questions in the application.

CNE - \$44,000

Timeline: August 2024 to April 2025

Deliverables and justification:

- (1) *Cost benefit analysis* of whether to change existing design to accommodate serving EVERY address in accordance with BEAD in a more cost effective manner than existing design.
- (2) *Determination of cost* for detailed design to be conducted when BEAD occurs. Need before BEAD for budget estimates.
- (3) *Evaluate for climate resilience and estimate cost to modify*. Our area suffered catastrophic floods stranding hundreds of our customers without service and creating many large repair costs. There are lessons learned that can be implemented in BEAD. We need to know what it would cost to design and then implement those changes specifically to meet climate resilience - which is a specific question in the VT-BEAD RFA.
- (4) *Evaluate nearly 1,000 off-grid / challenging addresses* and determine if possible to serve with fiber or if a secondary solution will be required and what the most cost effective approach will be.
- (5) *Complete a high level design* (not the detailed design) that incorporates the decisions from above in order to create the budget necessary to apply for BEAD.

Innovative - \$32,000

Timeline: December 2024 to February 2025

Deliverables and justification:

1. Convert the mapping system from one format into another in order for CNE to do the work above of creating the high level design and doing cost estimates.
2. The VT-BEAD RFA asks for the ability to identify costs per address which we are unable to determine under our current design maps - so the conversion to the relation map enables us to do a more detailed budget for the BEAD application for at least groups of addresses and enables us to evaluate costs for the BEAD application.

Desai Management - \$27,430

Timeline: August 2024 to April 2025

Deliverables and Justification:

1. Capacity to project manage BEAD application project. Deliverables include smartsheets, meeting minutes, vendor management.
2. Budget development work to take the statistical information from the work that CNE does in the Innovative map and convert it into information that can be used in the JSI business model.
3. Coordinate site visitation work through project management. Sites need to be visited in order to determine (a) if real BSLs; (b) what strategy to take to serve; (c) cost to serve for the budget.

KKROW - \$5,000

Deliverables and Justification:

1. Determine feasibility of doing an “overland” fiber project to sites that are more than one property line away from the main distribution fiber by evaluating a sample set to see how many of the addresses already have future utility easements and how many would need to be attained.
2. Use the above sample evaluation to estimate the cost to do that for the hundreds of addresses in that situation.
3. The goal is to use the above to create a budget for a fiber priority submission or to identify that it is not feasible and submit a portion that is non-priority.

EBI - \$40,000

4. Timeline: January 2025 to March 2025
5. Deliverables and Justification: NEPA evaluation and report for submission with BEAD application to determine if categorical exclusion will apply or if there are design changes that can mitigate environmental impact. Needed to determine cost of compliance, whether redesign will be necessary and what associated cost.



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

In implementing President Trump's Executive Orders, OMB issued guidance requesting that agencies temporarily pause, to the extent permitted by law, grant, loan or federal financial assistance programs that are implicated by the President's Executive Orders.

Any program not implicated by the President's Executive Orders is not subject to the pause.

The Executive Orders listed in the guidance are:

Protecting the American People Against Invasion

Reevaluating and Realigning United States Foreign Aid

Putting America First in International Environmental Agreements

Unleashing American Energy

Ending Radical and Wasteful Government DEI Programs and Preferencing

Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government

Enforcing the Hyde Amendment

Any program that provides direct benefits to individuals is not subject to the pause.

The guidance establishes a process for agencies to work with OMB to determine quickly whether any program is inconsistent with the President's Executive Orders. A pause could be as short as day. In fact, OMB has worked with agencies and has already approved many programs to continue even before the pause has gone into effect.

Any payment required by law to be paid will be paid without interruption or delay.

Q: Is this a freeze on all Federal financial assistance?

A: No, the pause does not apply across-the-board. It is expressly limited to programs, projects, and activities implicated by the President's Executive Orders, such as ending DEI, the green new deal, and funding nongovernmental organizations that undermine the national interest.

Q: Is this a freeze on benefits to Americans like SNAP or student loans?

A: No, any program that provides direct benefits to Americans is explicitly excluded from the pause and exempted from this review process. In addition to Social Security and Medicare, already explicitly excluded in the guidance, mandatory programs like Medicaid and SNAP will continue without pause.

Funds for small businesses, farmers, Pell grants, Head Start, rental assistance, and other similar programs will not be paused. If agencies are concerned that these programs may implicate the President's Executive Orders, they should consult OMB to begin to unwind these objectionable policies without a pause in the payments.

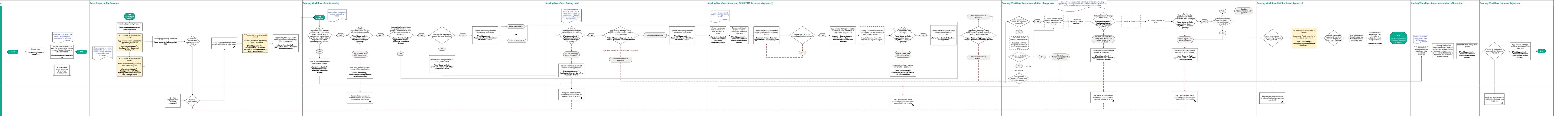
Q: Is the pause of federal financial assistance an impoundment?

A: No, it is not an impoundment under the Impoundment Control Act. It is a temporary pause to give agencies time to ensure that financial assistance conforms to the policies set out in the President's Executive Orders, to the extent permitted by law.

Temporary pauses are a necessary part of program implementation that have been ordered by past presidents to ensure that programs are being executed and funds spent in accordance with a new President's policies and do not constitute impoundments.

Q: Why was this pause necessary?

A: To act as faithful stewards of taxpayer money, new administrations must review federal programs to ensure that they are being executed in accordance with the law and the new President's policies.



1	Funding Opportunity	1.1	Edit Opportunity Details	Funding Opportunity Configuration: Vermont Broadband Equity, Access, and Deployment Program (VT-BEAD)
		1.2	Test Application	
2	Opportunity Workflow	2.1	Configure Opportunity Funding and Workflow	
		2.2	Enroll in Workflow	Funding Opportunity Workflow: BEAD Application Review
		2.3	Create Award via workflow	
		2.4	Reports	Reports: Applications - Submitted Applications, Applications - BEAD Scoring Report

VERMONT COMMUNITY BROADBAND BOARD

BROADBAND EQUITY, ACCESS, AND DEPLOYMENT (BEAD) PROGRAM

REQUEST FOR APPLICATIONS FOR VERMONT BEAD SUBRECIPIENTS

CONTENTS

VERMONT COMMUNITY BROADBAND BOARD	1
CONTENTS	1
CONTACT	1
<i>PROGRAM QUESTIONS AND TECHNICAL ASSISTANCE</i>	1
SECTION 1: OVERVIEW	1
<i>INTRODUCTION</i>	1
<i>ABBREVIATIONS & ACRONYMS</i>	2
<i>DEFINITIONS</i>	2
SECTION 2: VT-BEAD SUBRECIPIENT SELECTION PROCESS	7
<i>SUBRECIPIENT SELECTION PROCESS OVERVIEW</i>	7
<i>INITIAL AND FINAL PROJECT AREAS</i>	10
<i>LIMITED PERMISSIBLE PRE-IMPLEMENTATION ACTIVITIES</i>	14
<i>MATCH REQUIREMENT</i>	14
<i>FINANCIAL CAPABILITY REQUIREMENT</i>	15
<i>VT-BEAD IMPLEMENTATION TIMELINE</i>	17
SECTION 3: SUBMITTING A BEAD PRE-PROPOSAL	18
<i>QUESTIONS ON THE BEAD PRE-PROPOSAL FORM</i>	18
<i>VT-BEAD PRE-PROPOSAL MAPPING SECTION</i>	20
SECTION 4: SUBMITTING A BEAD FULL PROPOSAL	22
<i>INITIAL INFORMATION</i>	22
<i>GATING CRITERIA QUESTIONS</i>	22

<i>PROJECT OVERVIEW</i>	27
<i>PROJECT BUDGET</i>	28
<i>TECHNICAL CAPABILITY CRITERIA</i>	28
<i>SCORING CRITERIA QUESTIONS</i>	32
<i>FINAL QUESTIONS</i>	38
SECTION 5: GRANT TERMS & CONDITIONS	39
<i>GRANT CONDITIONS AND REQUIREMENTS</i>	39
<i>REPORTING REQUIREMENTS</i>	43
<i>SUBRECIPIENT & PROJECT MONITORING</i>	44
<i>GRANTEE PAYMENT SCHEDULE</i>	44
ADDENDUM 1: DETAILED BUSINESS PLAN INSTRUCTIONS	48
<i>COVER</i>	48
<i>EXECUTIVE SUMMARY</i>	48
<i>CAPITAL BUDGET</i>	49
<i>FINANCIAL PRO FORMA</i>	49
<i>TIMELINE</i>	50
<i>RISK AND CONTINGENCY PLAN</i>	50
ADDENDUM 2: MODEL LETTER OF CREDIT	51
<i>ANNEX A: FORM OF DRAFT</i>	53
<i>ANNEX B: DRAW CERTIFICATE</i>	54
<i>ANNEX C: CERTIFICATE REGARDING TERMINATION OF LETTER OF CREDIT</i>	55

CONTACT

PROGRAM QUESTIONS AND TECHNICAL ASSISTANCE

For general and programmatic questions, email the VCBB BEAD team at vcbb.bead@vermont.gov.

For Preproposal Portal technical assistance, email Stone Environmental at vcbb_tech_support@stone-env.com (vcbb_tech_support@stone-env.com).

SECTION 1: OVERVIEW

INTRODUCTION

The [Broadband Equity, Access, and Deployment \(BEAD\) Program](#) provides \$42.45 billion to expand high-speed internet access by funding infrastructure deployment programs in all 50 states, Washington D.C., and U.S. territories.¹

The Vermont Community Broadband Board² (VCBB) will administer the BEAD Program in Vermont with a [state allocation](#) of \$228,913,019.08. VCBB submitted its initial Letter of Intent to participate in BEAD in 2022 and received NTIA's approval of its application ([Vermont's BEAD Initial Proposal](#)), consisting of the Vermont's BEAD Five-Year Action Plan, Vermont's BEAD Initial Proposal Volume One, and Vermont's Initial Proposal Volume Two on July 25, 2024.

The Vermont BEAD (VT-BEAD) program is based on significant stakeholder engagement and aligns Vermont's broadband goals with the BEAD's federal goals and requirements. The application documents submitted to NTIA, along with additional information on VT-BEAD planning and implementation, can be found on the VCBB [Broadband Equity, Access, and Deployment \(BEAD\) Program](#) webpage.

This RFA solicits proposals from Prospective VT-BEAD Subrecipients to connect Unserved and Underserved Locations to attain universal broadband connectivity within a project area in Vermont.

¹ The [Infrastructure Investment and Jobs Act](#) of 2021 established the [Broadband Equity, Access, and Deployment \(BEAD\) Program](#), providing an appropriation of \$42.5 billion to the Department of Commerce for the deployment of broadband networks to Unserved and Underserved Locations (47 U.S.C. § 1702). The Department of Commerce assigned the administration of BEAD to the [National Telecommunications and Information Administration](#) (NTIA), which issued a [Notice of Funding Opportunity](#) (NOFO) on May 13, 2022.

² [Vermont Act 71](#) of 2021 established the Vermont Community Broadband Board within the Department of Public Service to coordinate, facilitate, support, and accelerate the development and implementation of universal community broadband solutions (30 V.S.A. §§ 8081–8089a).

ABBREVIATIONS & ACRONYMS

BEAD	Broadband Equity, Access, and Deployment
BSL	Broadband Serviceable Location
CAI	Community Anchor Institution
CUD	Communications Union District
EHCT	Extremely High Cost Per Location Threshold
FCC	Federal Communications Commission
ms	Milliseconds
Mbps	Megabits per second
NOFO	Notice of Funding Opportunity
NTIA	National Telecommunications and Information Administration
RFA	Request for Applications
VCBB	Vermont Community Broadband Board

DEFINITIONS

Broadband Equity, Access, and Deployment (BEAD) Program – A program authorized by the Infrastructure Investment and Jobs Act of 2021³ that provides federal funding to the National Telecommunications and Information Administration (NTIA) to grant to states, Washington, D.C., and U.S. territories for broadband planning, deployment, mapping, equity, and adoption activities. Under the BEAD Program, Vermont is eligible to receive up to \$228,913,019, which will be administered by the Vermont Community Broadband Board.

Broadband Serviceable Location (Location or BSL) – A business or residential Location in Vermont at which fixed broadband Internet access service is, or can be, installed. A BSL may be either Unserved, Underserved, or served; only Unserved and Underserved BSL's are eligible for BEAD funding.⁴

- **Served Location** – A Location that has broadband service offering speeds at or above 100 Mbps download / 20 Mbps upload and latency at home or below 100 milliseconds, after Vermont challenges and subsequent data alignments to capture enforceable commitments have been incorporated (see VCBB [ArcGIS Hub site](#) page).

³ Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60102, Public Law 117-58, 135 Stat. 429 (November 15, 2021), also known as the Infrastructure Act or Bipartisan Infrastructure Law.

⁴ See the NTIA [BEAD NOFO](#) (p. 13) for the complete NTIA definitions of “location” and “broadband serviceable Location” Additional information is available from the FCC: [About the Fabric: What a Broadband Serviceable Location \(BSL\) Is and Is Not](#).

- **Underserved Location** – A Location that is (a) not an Unserved Location, and (b) that has service offering only speeds below 100 Mbps download / 20 Mbps upload and/or latency above 100 milliseconds, after Vermont pre-modifications and challenges have been incorporated, as shown on the VCBB [ArcGIS Hub site](#) BEAD page.⁵
- **Unserved Location** – A Location that the Broadband DATA Maps⁶ show as without any broadband service or having broadband service offering only speeds below 25 Mbps download / 3 Mbps upload and/or latency above 100 milliseconds, after Vermont pre-modifications and challenges have been incorporated, as shown on the VCBB [ArcGIS Hub site](#) BEAD page.⁷

Community Anchor Institution (CAI) – An entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including, but not limited to, low-income individuals, unemployed individuals, children, the incarcerated, and aged individuals.⁸

Communications Union District (CUD) – A body politic and corporate consisting of two or more towns and cities for the purpose of delivering communications services and the operation of a communications plant. For the purposes of this RFA, CUDs are considered municipally organized entities. A map of current CUDs, as well as background information on CUDs in Vermont, can be found on the [Vermont Community Broadband Board](#) website.⁹

Consortium – Two or more Prospective Subrecipients that jointly propose to serve a Final Project Area, with each Prospective Subrecipient taking responsibility for serving different BSLs within the Final Project Area.

Extremely High Cost Per Location Threshold (EHCT) – A cost threshold for the average of each Unserved/Underserved Location in a project area, above which VCBB may decline to select a proposal or seek to adjust the cost of a proposal if negotiations with a Prospective Subrecipient do not result in a cost commitment below that threshold.¹⁰ The EHCT is based on the amount of VT-BEAD funding requested per Location (i.e., does not include match), is set iteratively after receiving all BEAD Full Proposals, and may vary from project area to project area.

⁵ See the [BEAD NOFO](#) (p. 7 and 16) for more information about Underserved Locations.

⁶ As defined in the [BEAD NOFO](#) (p. 11), “the term ‘Broadband DATA Maps’ means the maps created by the Federal Communications Commission under Section 802(c)(1) of the Communications Act of 1934 (47 U.S.C. § 642(c)(1)).”

⁷ See the [BEAD NOFO](#) (p. 7 and 17) for more information about Unserved Locations.

⁸ See the [BEAD NOFO](#) (p. 11) for more information about community anchor institutions.

⁹ See also [Vermont Title 30, Chapter 82](#): Communications Union Districts (30 V.S.A. §§ 3051–3085)

¹⁰ See the [BEAD NOFO](#) (p. 13) for more information about extremely high cost per Location thresholds.

Final Project Area – An area defined by VCBB including, if applicable, consideration of any requested modifications to the Initial Project Area filed by Prospective Subrecipients during the Pre-proposal period.

Final Proposal – VCBB’s final submission to the NTIA for BEAD grant funding that details how VT-BEAD will ensure that every Location in Vermont has access to a reliable, affordable, and highspeed broadband connection, drawing on all funding available to accomplish this goal, including but not limited to BEAD Program funds.¹¹

Funded Network – Any broadband network deployed and/or upgraded with BEAD program funds.¹²

Full Proposal – A Prospective Subrecipient’s bid for providing broadband service to each Unserved and Underserved Location within a Final Project Area. The full proposal must also demonstrate compliance with Gating Criteria and provides information to inform the number of points awarded for each of the Scoring Criteria.

Gating Criteria – A set of evaluation criteria that are required of each Prospective Subrecipient to be eligible for BEAD funding. If these criteria are not met, the Prospective Subrecipient is ineligible for BEAD funding, absent a waiver from the NTIA.¹³

Initial Project Area – The area defined by the boundaries of a Communications Union District (CUD) in those regions of the state where a CUD has been formed, or by the boundaries of a municipality in regions where no CUD has been formed. Prospective Subrecipients may request modifications to an Initial Project Area during the Pre-proposal period.

Letter of Credit – A requirement subject to a programmatic waiver allowing for the substitution of performance bonds.¹⁴ Where applicable, the Letter of Credit must be modeled after the VCBB Model Letter of Credit in Addendum 2.¹⁵

Middle Mile Infrastructure – Any broadband infrastructure that does not connect directly to an end-user Location, including a community anchor institution. This includes (i) leased dark fiber, interoffice transport, backhaul, carrier-neutral internet exchange facilities, carrier-neutral submarine cable landing stations, undersea cables, transport connectivity to data centers, special access transport, and other similar services; and (ii) wired or private wireless broadband infrastructure, including microwave capacity, radio tower access, and other services or infrastructure for a private wireless broadband network, such as towers, fiber,

¹¹ Internet For All Broadband Equity, Access, and Deployment (BEAD) Program Final Proposal Guidance for Eligible Entities, p. 4.

¹² See the [BEAD NOFO](#) (p. 13) for more information about funded networks.

¹³ Adapted from NTIA’s [Tricky Topics to Watch Out for in the Initial Proposal](#) (p. 6). The one exception to the statement that, "If these criteria are not met, the Prospective Subrecipient is ineligible for BEAD funding," is the instance where VCBB requests and is granted a waiver from the NTIA at the time of Final Proposal.

¹⁴ See the [BEAD NOFO](#) (p. 72–73) for more information about the letter of credit.

¹⁵ See [BEAD Letter of Credit Waiver](#) notice and the definition for “Comparable Evidence for Letter of Credit.”

and microwave links.¹⁶ As outlined by the BEAD NOFO (p. 69), any subrecipient that has received VT-BEAD funds for construction of Middle Mile Infrastructure must permit other broadband service providers to interconnect with its funded Middle Mile Infrastructure network facilities on a just, reasonable, and nondiscriminatory basis.

National Telecommunications and Information Administration (NTIA) – An agency within the U.S. Department of Commerce that is responsible for overseeing the BEAD Program and distributing BEAD funding to states.

Notice of Funding Opportunity (NOFO) – The Notice of Funding Opportunity (NOFO) for the Broadband Equity, Access, and Deployment (BEAD) Program describes how NTIA intends to administer the BEAD Program.

Other Last-Mile Broadband Deployment Project – A project that is not a Priority Broadband Project.

Pre-proposal – A Prospective Subrecipient’s submission that notifies the VCBB of its intent to participate in VT-BEAD, identifies any requested modifications to the Initial Project Area(s) for which it intends to submit a Full Proposal, and answers questions to provide basic information about its forthcoming Full Proposal and to indicate readiness to meet BEAD Gating Criteria. In most instances, filing a Pre-proposal for an Initial Project Area is required to have a Full Proposal considered for the corresponding Final Project Area. Filing a Pre-proposal for an Initial Project Area also constitutes a commitment to file a Full Proposal for the corresponding Final Project Area.

Priority Broadband Project – A project that will provision service via end-to-end fiber-optic facilities to each end-user premises. Any project that might otherwise qualify as a Priority Broadband Project may be disqualified from Priority Broadband Project status, with the approval of the Assistant Secretary of Commerce for Communications and Information, on the basis that the Location surpasses the VCBB’s Extremely High Cost per Location Threshold (EHCT), or for other valid reasons subject to approval by the Assistant Secretary.¹⁷

Project – A set of Locations within a Final Project Area to which a subrecipient commits to constructing and deploying infrastructure for the provision of broadband service. The Project must include every Unserved and Underserved Location within the Final Project Area and may also include a subset of served Locations (within the same Final Project Area) that the Prospective Subrecipient has identified as essential to completing the project. The number of served Locations in the Project may in no case exceeds 20% of the total number of Locations in the Project.¹⁸

Prospective Subrecipient – An entity that meets VT-BEAD Gating Criteria and, by filing a Pre-proposal, commits to participate in VT-BEAD. For Initial Project Areas where no entity

¹⁶ See the [BEAD NOFO](#) (p. 13–14) for more information about middle mile infrastructure.

¹⁷ See the [BEAD NOFO](#) (p. 14 and 42) for more information about priority broadband projects.

¹⁸ See the [BEAD NOFO](#) (p. 14) for more information about projects.

files a Priority Broadband Project Pre-proposal, a Prospective Subrecipient may also include an entity that files a Full Proposal for the corresponding Final Project Area.

Reliable Broadband Service – Broadband service accessible via (i) fiber-optic technology; (ii) Cable Modem/ Hybrid fiber-coaxial technology; (iii) digital subscriber line (DSL) technology; or (iv) terrestrial fixed wireless technology utilizing entirely licensed spectrum or using a hybrid of licensed and unlicensed spectrum. Technology types that do not constitute Reliable Broadband Service include satellite, services using entirely unlicensed spectrum, and technologies not specified by the FCC for purposes of the Broadband DATA Maps.¹⁹

Scoring Criteria – Evaluation criteria that will be used to assign values or points to Full Proposals from competing Prospective Subrecipients. Scoring criteria are not requirements, but VCBB will determine which proposals to select for funding by allotting points based on these criteria.²⁰

Subrecipient – An entity chosen by VCBB to receive BEAD grant funds from the State of Vermont to carry out BEAD-eligible activities.²¹

Vermont Community Broadband Board (VCBB) – VCBB is the entity responsible for administering Vermont’s NTIA-Approved Broadband Equity, Access and Deployment Program (VT-BEAD). Vermont Act 71 of 2021 established the Vermont Community Broadband Board, consisting of five members and an Executive Director, within the Department of Public Service (PSD). VCBB staff are State of Vermont employees under the PSD.

VT-BEAD – Vermont’s NTIA-approved Broadband Equity, Access, and Deployment (BEAD) Program.

¹⁹ See the [BEAD NOFO](#) (p. 15 and 28) for more information about reliable broadband service.

²⁰ Adapted from NTIA’s [Tricky Topics to Watch Out for in the Initial Proposal](#) (p. 6).

²¹ See the [BEAD NOFO](#) (p. 15) for more information about the term “subrecipient.”

SECTION 2: VT-BEAD SUBRECIPIENT SELECTION PROCESS

SUBRECIPIENT SELECTION PROCESS OVERVIEW

In line with Vermont goals and federal guidelines, the VCBB has developed a transparent, fair, open, and competitive subrecipient selection process for receiving proposals from Prospective Subrecipients for VT-BEAD projects to advance universal broadband connectivity throughout Vermont. This process is open to any cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, or local governments.

The subrecipient selection process enables Prospective Subrecipients to request modifications to Initial Project Areas during the Pre-proposal period. VCBB may consider the modifications in determining Final Project Areas. During the Full Proposal Period, Prospective Subrecipients are required to propose how they will connect all Unserved and Underserved Locations within a Final Project Area, including an optional subset of served Locations consisting of no more than 20% of all Locations in the Prospective Subrecipient's proposed Project.

VCBB strongly encourages Prospective Subrecipients to utilize end-to-end fiber networks to each end-user premises (i.e., Priority Broadband Projects) to the extent feasible. Priority Broadband Projects will receive priority for VT-BEAD funding over Other Last-Mile Broadband Deployment Projects (Projects that are not Priority Broadband Projects; see Definitions) to the extent that funding allows. Per NTIA guidance issued after the approval of Vermont's Initial Proposal Volume 2, any changes to a Priority Broadband Project that occur during the Full Proposal negotiation stage and result in utilizing non fiber solutions (for example, to serve high cost Locations with a different technology to ensure a proposal is below the EHCT) will lose its Priority Broadband Project status and will be re-scored against other non-priority proposals. The VCBB encourages Prospective Subrecipients to maximize the number of Locations that they propose to reach with end-to-end fiber, particularly where the cost to deploy fiber is cost-effective.

The VCBB will allow applications from a Consortium. Per NTIA guidance, a Consortium application requires a single lead applicant for each Final Project Area. Consortium applications that span multiple project areas must be separable, *i.e.*, VCBB may select the Consortium as the winner in one project area but not another.²² A Consortium must be documented with a signed memorandum of understanding among the parties that declares the intention to operate as a consortium for the purposes of BEAD and identifies the lead applicant. If a Consortium is awarded a BEAD subaward, VCBB will establish a grant agreement directly with the lead applicant. The grant agreement will cover all awarded grant funds for the entire project, and the lead applicant will serve as the primary contact and

²² For example, if a consortium applied to serve PA009 and PA010 with consortium member A serving PA009 and member B serving PA010, the VCBB may select the consortium for PA009 but not PA010.

responsible party for the subaward. VCBB may create separate agreements for individual members of a Consortium to hold each member accountable for their specific roles and responsibilities. VCBB has discretion in determining the terms of these individual agreements. BEAD match is tied to each specific Final Project Area, meaning Consortium members may not pool or share match across Final Project Areas.

The subrecipient selection process has two phases: (1) Pre-proposal, and (2) Full Proposal. In the Pre-proposal phase, the Prospective Subrecipient notifies VCBB of its intent to participate in VT-BEAD, requests any desired modifications to the Initial Project Area(s) for which it intends to submit a Full Proposal, provides basic information about the forthcoming Full Proposal, and indicates readiness to meet BEAD Gating Criteria. In the absence of the exceptions listed below, failure to file a Pre-proposal for an Initial Project Area will result in disqualification from participating in VT-BEAD for the corresponding Final Project Area.

The exceptions under which a Full Proposal may be considered from a Prospective Subrecipient that did not previously file a Pre-proposal are as follows:

1. The Full Proposal is a Priority Broadband Project for a Final Project Area that received no Priority Broadband Project Pre-proposals.
2. The Full Proposal is a Priority Broadband Project for a Final Project Area that did receive at least one Priority Broadband Project Pre-proposal, but none of the Prospective Subrecipients that filed Priority Broadband Project Pre-proposals meet the necessary gating criteria upon review of their Full Proposals.
3. The Full Proposal is not a Priority Broadband Project and is for a Final Project Area that did not receive any Pre-proposals.
4. The Full Proposal is not a Priority Broadband Project and is for a Final Project Area that did receive at least one Pre-proposal, but none of the Prospective Subrecipients that filed Pre-proposals meet the necessary gating criteria upon filing of their Full Proposals.
5. A new Final Project Area has been created based on input received during the Pre-proposal phase or during final proposal negotiations.

Filing a Pre-proposal constitutes a commitment to filing a Full Proposal. A Prospective Subrecipient that files a Pre-proposal with recommended modifications to the initial project area that are accepted by VCBB in the final project area and fails to file a Full Proposal for the corresponding Final Project Area may be disqualified from receiving funding from VT-BEAD for that Final Project Area during any part of the process. An applicant that files a pre-proposal on a project area that is modified via the pre-proposal process may still apply to serve the resulting project area.²³

²³ For example, initial project area (IPA) 4 receives two pre-proposals, A and B. Pre-proposal A does not ask for any modifications to IPA 4, and pre-proposal B asks to add half of IPA 5 into IPA 4. The entity that submitted a pre-proposal for IPA 4 may submit a final proposal for the newly created final project area comprising the original IPA 4 and half of IPA 5.

After the Pre-proposal filing window has closed, VCBB staff will review Initial Project Areas modification requests and determine the Final Project Areas (as described in the Initial and Final Project Areas section of this RFA). VCBB will then officially provide public notice of the Full Proposal window opening and publish a description of the Final Project Areas. VCBB will also identify which Final Project Areas received at least one Priority Broadband Project Pre-proposal; which Final Project Areas received no Priority Broadband Project Pre-proposals but at least one Other Last- Mile Broadband Deployment Project Pre-proposal; and which Final Project Areas received no Pre-proposals. VCBB may actively solicit Full Proposals for Final Project Areas that did not receive Pre-proposals.

Once the Pre-proposal submission window has opened, VCBB will impose a quiet period lasting until VCBB Board has approved the BEAD project awards. During this quiet period, communications between Prospective Subrecipients and between Prospective Subrecipients and the public regarding the specific nature of a Prospective Subrecipient's participation are prohibited. During the quiet period time, VCBB may continue some types of communications with Prospective Subrecipients. Specifically, VCBB acknowledges that some Prospective Subrecipients may have business arrangements outside of the BEAD context and may need to communicate as part of those arrangements. As noted above, the restriction imposed here is prohibition on communications between VCBB and Prospective Subrecipients and between Prospective Subrecipients on the specific nature of a Prospective Subrecipient's BEAD application. Communications related to business matters that are outside the scope of the BEAD proposal are permitted. Further, where two or more entities are planning to submit a proposal as a consortium, communication among those entities is essential to preparing a proposal and therefore is permitted, provided those entities have signed a MOU per the above requirements for consortium formation. A Prospective Subrecipient that communicates details regarding its proposal in violation of the quiet period will be disqualified from participating in the BEAD Program.

After the Full Proposal submission window has closed, VCBB will begin review of the Full Proposals. BEAD subawards will be awarded to the highest scoring proposals that satisfy all gating criteria and can be negotiated below the Extremely High Cost Per Location Threshold (EHCT) for that Final Project Area. Priority will be given to Priority Broadband Projects.

If there are Final Project Areas that do not receive any Full Proposals that meet the necessary gating requirements, or for which all Full Proposals meeting the necessary gating requirements exceed the EHCT and cannot be negotiated to an acceptable price, VCBB will create an inventory of those areas and may work with any known providers to negotiate a plan to ensure that these areas are served. To the extent reasonably necessary to serve these Locations, VCBB reserves the right to include alternative technology²⁴ types and to run multiple competitive application rounds.

²⁴ See NTIA'S [Reliable Broadband Services and Alternative Technologies](#) resource and [Draft BEAD Alternative Broadband Technology Policy Notice For Public Comment](#).

INITIAL AND FINAL PROJECT AREAS

VCBB has defined the Initial Project Areas as the boundaries of a Communications Union District (CUD) in those regions of the state where a CUD has been formed, or the boundaries of a municipality in regions where no CUD has been formed. The Initial Project Areas are shown on the map in Figure 1 at the end of this section. A list of all Unserved and Underserved BSLs can be found on the VCBB [ArcGIS Hub site](#) BEAD page. During the Pre-proposal phase, Prospective Subrecipients may request modifications to the Initial Project Areas in the following circumstances. It is important to note that this will be the only time that Prospective Subrecipients can proactively request project area changes, specified as follows:

1. **Initial Project Areas bounded by a CUD:** Prospective Subrecipients may request project area modifications that would facilitate achieving universal service and maximize the ability to provide a Priority Broadband Project Full Proposal. Prospective Subrecipients must detail the costs and benefits of the proposed changes and avoid leaving Locations in a project area that can only be served by passing through a different project area. Reasons to request a project area modification may include the following:
 - The Location would be reached more cost effectively by moving it to another project area.
 - The Location is marked as a BSL but is not actually a Location requiring service.
 - Including a Location would increase the resiliency or redundancy of the network.
 - The Location would likely be prohibitively costly to serve with fiber.
2. **Initial Project Areas outside of a CUD and bounded by a municipality:** Prospective Subrecipients may request project area modifications for any of the reasons relevant to Initial Project Areas bounded by a CUD, as well as to address instances where a wire center serves only part of a municipality or where other existing network infrastructure delineates the area an existing provider currently serves. In these cases, VCBB will consider Pre-proposals that propose to serve only the portion of the town covered by the network infrastructure, or to add in portions of another town covered by the same network infrastructure and may approve the requested modification on these bases.

Once the Pre-proposal filing window has closed, VCBB will consider the requested modifications to the Initial Project Areas and will make the Final Project Area determinations based on VCBB's analysis of which Final Project Areas will best advance the state's objective of reaching universal service, as expressed in both [Vermont Act 71](#) of 2021 and the [BEAD NOFO](#). VCBB will ensure that after any project area modifications are made, each Unserved and Underserved Location in the state is still contained within a Final Project Area (unless VCBB determines that an Unserved or Underserved Location does not constitute a BSL and commits to seeking a waiver from the NTIA for that Location on that basis). The

project area modifications VCBB may choose to make include but are not limited to the following:

- Adding certain Locations to the Initial Project Area;
- Moving certain Locations out of the Initial Project Area to a different project area;
- Creating a new project area;
- Removing certain Locations from the Initial Project Area that do not meet the requirements for BSLs by verifying that a provider has submitted an FCC challenge and required evidence to enable Vermont to obtain a waiver for these Locations from the NTIA; or
- Denying the requested modification.

VCBB will not consider a request for modification for an Initial Project Area bounded by a CUD if it receives a Priority Broadband Project Pre-proposal committing to serve every Unserved and Underserved Location in one or more Initial Project Area(s).

VCBB will publish a list of Final Project Areas on the VCBB [ArcGIS Hub site](#) BEAD page, along with the corresponding Initial Project Area for each Final Project Area, when applicable. VCBB reserves the right to adjust Final Project Areas during the negotiating process if those changes further the State's goal of maximizing the amount of fiber deployed statewide. Once VCBB has released the Final Project Areas, these boundaries and the set of Unserved and Underserved Locations contained within them may not be modified prior to the negotiation phase.²⁵

Within the boundaries of a Final Project area, Prospective Subrecipients will be required to provide service to all Unserved and Underserved Locations not subject to an enforceable commitment. This includes Locations that are connected to the electric power grid, as well as Locations that are off-grid. Additionally, Prospective Subrecipients will have the option to include certain served Locations within the Final Project Area boundaries. The exact number and identity of the Served Locations is at the discretion of each Prospective Subrecipient; however, the total number of Served Locations may not exceed 20 percent of the total number of Locations included (Unserved + Underserved + Served Locations). As noted above, the set of Locations that includes all the Unserved and Underserved Locations within the Final Project Area, as well as the optional subset of Served Locations within the Final Project Area, together constitute a Project.

Because the VT-BEAD funding requested for each Final Project Area will be directly compared to the number of Unserved and Underserved Locations within that Final Project Area, a Prospective Subrecipient's decision to include or not include additional Served Locations will have no impact on the scoring of the Full Proposal. Thus, Full Proposals must include a plan for reaching each Unserved and Underserved Location in the Final Project

²⁵ This is a change from Vermont's Initial Proposal Volume 2, which will be amended accordingly pending NTIA approval.

Area and may include a plan for reaching additional served Locations (up to 20% of the total Project Locations).

In certain instances, Prospective Subrecipients' network designs for a Final Project Area may also require the use of Middle Mile Infrastructure inside or outside the boundaries of that Final Project Area. In accordance with NTIA guidance, a project "may include Middle Mile Infrastructure in or through any area required to reach interconnection points or otherwise to ensure the technical feasibility and financial sustainability of a project providing service to an unserved Location, Underserved Location, or eligible CAI."²⁶ In instances where Middle Mile Infrastructure is included in project costs, Prospective Subrecipients' network design must minimize BEAD outlays by taking the most efficient route to the Final Project Area. Prospective Subrecipients will be required to provide a map of such routes and a narrative sufficiently explaining why they are necessary and the most efficient routes, subject to VCBB's approval. As outlined by the BEAD NOFO (p. 69), any subrecipient that has received VT-BEAD funds for construction of Middle Mile Infrastructure must permit other broadband service providers to interconnect with its funded Middle Mile Infrastructure network facilities on a just, reasonable, and nondiscriminatory basis.

²⁶ See NTIA's [Frequently Asked Questions and Answers](#) Version 6.0 (p. 49, question 10.1 part 2).

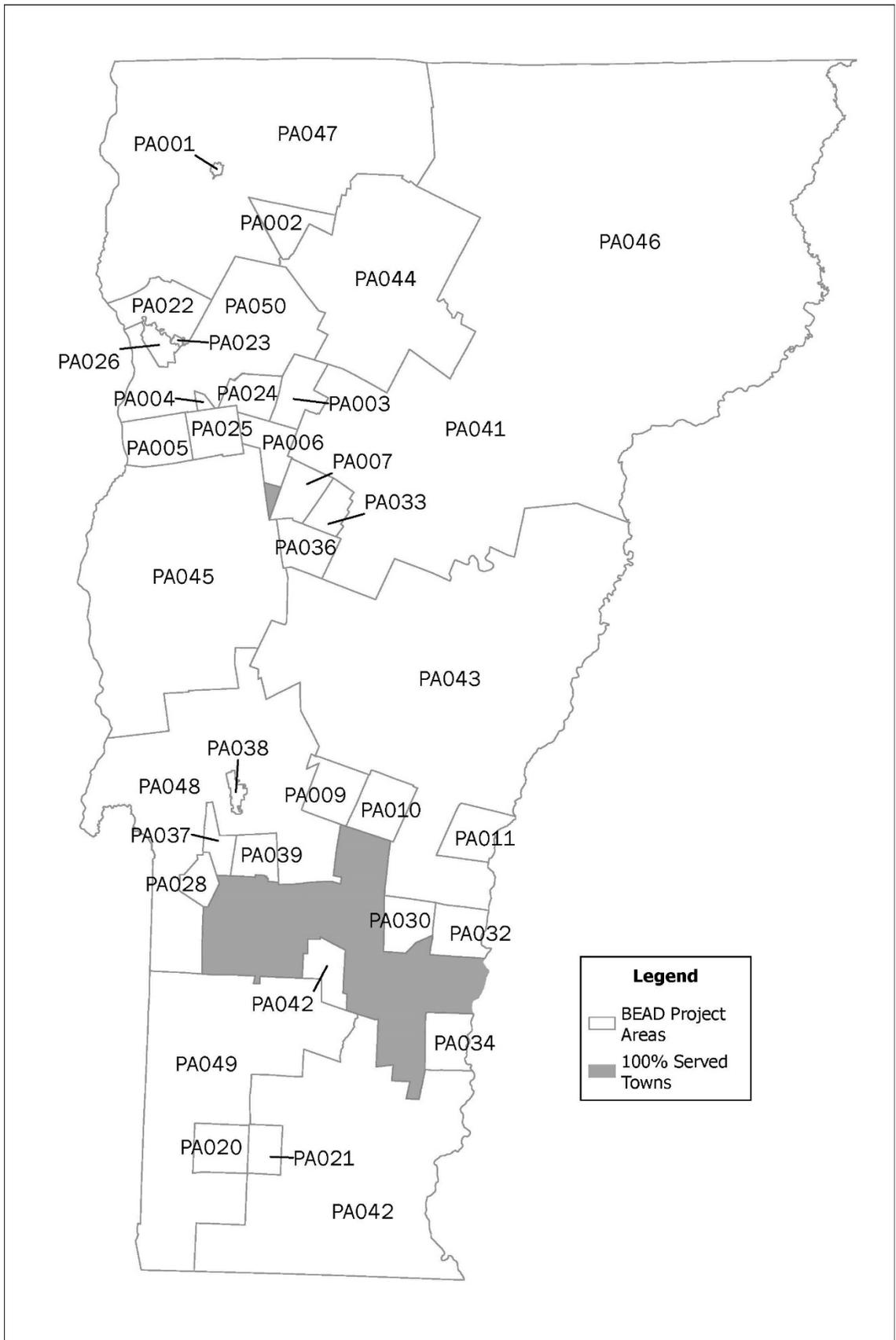


Figure 1: Initial Project Areas

LIMITED PERMISSIBLE PRE-IMPLEMENTATION ACTIVITIES

Implementation activities (site preparation, demolition, construction, ground disturbance, fixed installation, or any other implementation activities) may not begin prior to the completion of all environmental historic preservation (EHP) requirements as outlined in this section. The Subrecipient must comply with all conditions placed on the grant funded activities as the result of National Environmental Policy Act (NEPA) or the National Historic Preservation Act (NHPA) consultation or processes under other applicable laws—e.g., mitigation requirements, best management practices, or other measures necessary to reduce environmental impact. The subrecipient must also provide any information requested by VCBB or NTIA to ensure both initial and ongoing compliance with all requirements described above.

Based on the guidelines outlined by the NTIA, VCBB will allow limited permissible activities under NEPA to proceed using award funds prior to the completion of the environmental and historic preservation review process, including the following:

- Pre-construction planning, including collecting information necessary to complete environmental reviews;
- Applications for environmental permits;
- Studies including, but not limited to, environmental assessments (EA), wetland delineations, biological assessments, archaeological surveys, and other environmental reviews and analyses;
- Administrative costs directly related to the EHP process;
- Application costs directly related to the EHP process;
- Activities supporting consultations required under the NHPA, the Endangered Species Act, and the Clean Water Act; and/or
- Limited, preliminary procurement, including the purchase or lease of equipment, or entering into binding contracts to do so; the purchase of applicable or conditional insurance; and/or funds used to secure land or building leases (including right-of-way easements).

Subrecipients who undertake pre-implementation activities proceed at their own risk even when these activities would be allowable after the start date of a VT-BEAD award.

Undertaking pre-award activities or incurring pre-award costs imposes no obligation on VCBB or NTIA to award funds for such costs. In no case will VCBB pay for work completed or costs incurred prior to the submission of a Full Proposal.

MATCH REQUIREMENT

Consistent with the [BEAD NOFO](#), VCBB's goal is to minimize BEAD program outlays and maximize subrecipient matches in areas where expected operational costs and revenues are likely to justify greater investment by the subrecipient. VCBB is incentivizing Prospective Subrecipients to reduce project costs and to maximize matches by placing significant

weighting on the minimal BEAD program outlay primary scoring criteria. At the same time, VCBB is concerned that a 25 percent minimum match requirement may place too great a burden on certain subaward proposals to extend broadband networks into extremely high-cost Locations in the state. Specifically, VCBB is concerned that a 25 percent match minimum will undermine the commercial feasibility and sustainability of these projects and thus disincentivize investment in higher-cost rural areas, contrary to the stated goals of the Infrastructure Act and the BEAD NOFO.

VCBB therefore urges prospective subrecipients to consider the costs to deploy broadband to all Unserved and Underserved Locations within the Final Project Area, but also to undertake a granular analysis that provides the prospective subrecipient a firm understanding of the cost of each such Location. The VCBB acknowledges that there may be Locations where a 25 percent match is prohibitive to advancing a sustainable business case for service in the Final Project Area. Should a prospective subrecipient determine that there are Locations within the Final Project Area that warrant consideration of a waiver of the 25 percent matching requirement for the Final Project Area the prospective subrecipient is encouraged to submit its proposal and outline the reasons for its determination and request that a project area waiver of this requirement be granted. Such a waiver request is subject to approval by the NTIA and will be narrowly tailored to those Final Project Areas where a waiver is deemed necessary. In addition, VCBB intends to maximize match from ARPA projects to the greatest extent permissible, in accordance with Vermont law, the BEAD NOFO, and 2 CFR Part 200.

VCBB is currently awaiting guidance from NTIA on details of how and when funds or infrastructure can be counted as in-kind match. Consistent with the BEAD NOFO (p. 81), allowable costs are determined in accordance with the cost principles identified in 2 CFR Part 200, including Subpart E of such regulations for States and non-profit organizations, and in 48 CFR Part 31 for commercial organizations, as well as in the grant program's authorizing legislation. The government has established a set of principles for determining eligible or allowable costs. Allowable costs are determined in accordance with the cost principles applicable to the entity incurring the costs. Current guidance from NTIA about match requirements can be found in the [Broadband Equity Access Deployment Program \(BEAD\) Frequently Asked Questions Version 7.0](#) (p.48–51) and the [BEAD Match Primer](#).

FINANCIAL CAPABILITY REQUIREMENT

Prospective Subrecipients must certify their financial qualifications to comply with their obligations under VT-BEAD. Pursuant to Section IV.D.2.a.i. of the BEAD NOFO, the certification must include that they have funds available to pay for all project costs exceeding the amount of the grants. In addition, they must certify that they have sufficient financial resources to cover eligible costs as they achieve project milestones prior to reimbursement by the VCBB.

The [BEAD NOFO](#) includes an initial standby irrevocable Letter of Credit (LOC) for 25

percent of the applicable subaward.²⁷ This LOC requirement was modified in NTIA's conditional programmatic waiver, [Programmatic Waiver of BEAD Letter of Credit Requirement](#) (October 23, 2023). The Programmatic Waiver allows Prospective Subrecipients the option of utilizing a Performance Bond covering 100 percent of the amount of the VT-BEAD subaward as an alternative to the LOC and permits both the LOC and the Performance Bond to be reduced based upon the subrecipient's attainment of specific milestones. See Programmatic Waiver, Section 2.3.²⁸

Thus, each Prospective Subrecipient must establish either its own financial qualifications to participate in the VT-BEAD program with a LOC or obtain a Performance Bond insuring its performance of the subaward. VCBB anticipates that most Prospective Subrecipients will be availing themselves of the opportunity to use Performance Bonds rather than obtaining a LOC.²⁹ Prior to entering into any subgrantee agreement, Prospective Subrecipients relying on LOCs to meet this requirement must provide the actual irrevocable standby LOC in the required form, as well as an opinion letter from their legal counsel confirming that the LOC or its proceeds will not be treated as the Subrecipient's property in any subsequent bankruptcy proceeding.

The VCBB will require Prospective Subrecipients using a LOC to obtain one that is equal to 25 percent of subaward amount, as stated in the NOFO, to begin receiving funding. If the subrecipient meets the buildout plan set forth in its proposal for the first year, it will be permitted to renew its LOC in an amount that is consistent with Section 2.3 of NTIA's Programmatic Waiver, "Reduction of LOC/Performance Bonds Upon Completion of Milestones." If the subrecipient fails to meet its buildout plan, it will be required to put in place a LOC that is equal to 25 percent of the subaward amount until such time as it is able to demonstrate to VCBB that it has returned to being on schedule with its buildout plan. If the subrecipient continues to meet its buildout obligation. LOC equal to one year of project funding. This structure is consistent with the NTIA's [BEAD Programmatic Waiver of Letter of Credit Requirement](#).

²⁷ For purposes of the application, a bank's commitment to issue the letter of credit is sufficient. See FN #92, BEAD NOFO at p. 73.

²⁸ The Programmatic Waiver also allows entities which choose to provide a Letter of Credit to obtain such a letter from credit unions in addition to banks.

²⁹ Please note that, based on [NTIA's Financial Capability Alternatives Policy Notice](#), VCBB no longer anticipates that municipal Prospective Subrecipients will seek to demonstrate their financial capabilities based upon their authority to issue public bonds and has removed that option from the RFA. Should any such Prospective Subrecipient inform VCBB that it meets the criteria set forth in that policy, VCBB will consider the request and may seek a waiver from the NTIA if appropriate.

VT-BEAD IMPLEMENTATION TIMELINE

The above process will be conducted according to the following estimated timeline. Prospective Subrecipients should check the VCBB's [Broadband Equity, Access, and Deployment](#) webpage for the most up-to-date timeline.

Start Date	End Date	Activity	Notes
November 2024	January 2024	Host Subrecipient Preparedness Workshops	
December 3, 2024	January 9, 2025	Pre-proposal window open	Noon deadline on January 9
January 13, 2025	February 13, 2025	Pre-proposal review and final project area determination	Ensure all unserved locations will be included within a full proposal
February 17, 2025		Post final project areas	
March 3, 2025	April 14, 2025	Full proposal window open	
April 15, 2025	June 6, 2025	Subrecipient initial selection and negotiation process	

SECTION 3: SUBMITTING A BEAD PRE-PROPOSAL

The Pre-proposal process requires Prospective Subrecipients to notify VCBB of their commitment to participate in the VT-BEAD funding opportunity and to identify any requested modifications to the Initial Project Area(s) for which they intend to bid. It also requires basic information about the forthcoming Full Proposal and indication that the Prospective Subrecipient is ready to meet the necessary gating requirements to apply for BEAD funding. Filing a Pre-proposal constitutes a binding commitment on the Prospective Subrecipient to submit a Full Proposal, and in most instances is required for VCBB to consider a Full Proposal for a VT-BEAD subaward. The specific instances in which a Pre-proposal is not required to have a Full Proposal considered are outlined in the Subrecipient Selection Process Overview section of this RFA.

The identity of the Prospective Subrecipients submitting Pre-proposals, the exact number of Pre-proposals received for any given project area, and/or the content of the Pre-proposals will be treated as exempt from production under the contract negotiation exemption to the Vermont Public Records Act, 1 V.S.A. § 317(15). VCBB will make public the presence or absence of Priority Broadband Project Pre-proposals and Other Last-Mile Broadband Deployment Project Pre-proposals in a Final Project Area, as well as project areas that received no bids to solicit Full Proposals for any Final Project Areas lacking Pre-proposals.

For Prospective Subrecipients submitting a Pre-proposal as part of a consortium, each entity in the consortium should submit Pre-proposal Preparedness for Gating Criteria; however, only the lead consortium member may submit project area data, including any requests for project area modifications.

QUESTIONS ON THE BEAD PRE-PROPOSAL FORM

The following questions appear in the [VT-BEAD Pre-proposal portal](#), which will open on December 3, 2024.

1. Provide the entity name, main office address, Unique Entity Identifier (UEI) assigned by SAM.gov, FCC Unique Entity ID, State of Vermont Supplier Number (optional), Fiscal Year End Month (MM format), and the primary contact's name, title, phone number, and email address.
2. Which type of entity do you represent? Select all that apply: electric cooperative, nonprofit organization, public-private partnership, private company, public or private utility, public utility district, local government, consortium, other (specify).
3. Preparedness for Gating Criteria questions that will be asked with the Full Proposal:
 - a. Has your entity provided a voice, broadband, and/or electric transmission or distribution service for at least two (2) consecutive years prior to the date of this proposal submission?
 - If you selected **yes** or **we are a wholly owned subsidiary of such an entity**: specify the number of years your entity or its parent company has been operating

- If you selected **no**: what evidence do you plan to submit at the time of full application to demonstrate that you have obtained, through internal or external resources, sufficient operational capabilities (for example, project descriptions and narratives from contractors, subcontractors, or other partners with relevant operational experience, or other comparable evidence)?
- b. Does your entity have financial statements from the most recent fiscal year that are audited by an independent certified public accountant?
 - If you selected **no**: check the box to confirm that you understand that you may submit unaudited financial statements from the prior fiscal year at the time of Full Proposal submission, but that you must provide audited financial statements from the prior fiscal year if your proposal is selected.
 - c. Does your entity have a business plan that complies with the detailed instructions in Addendum 1?
 - If you selected **no**: explain your plan to develop one by the time of submission of the Full Proposal.
 - d. Does your entity intend to provide a letter from a bank or credit union at the time of Full Proposal submission that agrees to providing a Letter of Credit if your entity is selected for an award?
 - If you selected **yes**: which bank or credit union are you working with?
 - Describe the status of acquiring this letter.
 - If you selected **no**: select one of the following: (1) we plan to rely on a Performance Bond issued to us; or (2) we plan to rely on a Performance Bond issued to us and our contractor/s, consistent with the NTIA's [Conditional Programmatic Waiver of the NOFO's Letter of Credit Requirement](#) notice.
 - e. Briefly describe the work you have done to familiarize yourself with the requirements of the National Environmental Policy Act and how you will ensure that the Full Proposal you file complies with this act.
 - f. Briefly describe the work you have done to familiarize yourself with the requirements of the Build America, Buy America (BABA) Act and how you will ensure that the Full Proposal you file complies with this act.
4. Select the Initial Project Area(s) for which you commit to submitting Full Proposals.
 5. For each project area for which you commit to submit a Full Proposal, answer the following questions:
 - a. Do you plan to submit a Full Proposal for this project area as a Priority Broadband Project?
 - If you selected **yes**: does your entity currently operate a network that meets the VCBB [Outside Plant Design standards](#)?

- If you selected **no**: what is your plan to ensure that the proposed BEAD project complies with VCBB’s Outside Plant Design standards?
- b. Select the technology or technologies that you intend to deploy in this project area: fiber to the premises, cable, DSL, licensed fixed wireless, satellite, other (specify). If you plan to submit a Full Proposal for a Priority Broadband Project, you should only select “fiber to the premises.”
 - c. If more than one technology was selected, describe how the combination will be deployed and what proportion of the network will be built with each technology indicated.
 - d. Provide an estimate of the amount of BEAD funding you anticipate requesting for this project area at the time of Full Proposal. This estimate is confidential, non-binding, and will be used by VCBB for planning purposes only. VCBB understands the estimate is subject to change before submission of a Full Proposal.
 - e. If applicable, you may use this space to provide any additional explanation of the BEAD funding estimate provided above
 - f. Do you request consideration that any of the Initial Project Areas be modified prior to submission of Full Proposals?

If you selected **yes**: complete the mapping section that follows.

VT-BEAD PRE-PROPOSAL MAPPING SECTION

1. Upload a list of Locations in CSV format, which applicants may create by selecting a list of Locations from the map or clicking on each Location on the map separately. Note that this set of Locations could be as small as a single Location, or it could be large enough to fully encompass one or more other Initial Project Areas (if an applicant will subsequently request to combine multiple Initial Project Areas).
2. For each set of Locations selected on the map or uploaded as a list, select from the following options (select only one):
 - a. We request that these locations be removed from the selected Initial Project Area and added to a different existing Initial Project Area.
 - Which Initial Project Area should the Locations be added to? (Select from a list of Initial Project Areas or select “New IPA” if these Locations should form their own new project area.)
 - Provide written justification of how moving the Locations to a different project area would better serve the goal of universal service in Vermont. This could include an analysis of the relative cost to serve the Locations in the Initial Project Area versus after the proposed move, or a description of the risk of Locations being left without a means to reach them if the move is not undertaken.
 - Upload any supplementary documentation, as necessary, to justify the proposed removal of Locations from this initial project area.

- b. We request that these locations be removed from their current Initial Project Area(s) and added to the selected Initial Project Area.
- Upload the CSV file containing the list of locations you would like modified.
- c. These Unserved/Underserved Locations within the Initial Project Area do not constitute BSLs and therefore should not be required to be served under BEAD.³⁰ If this option is selected, also answer the following questions:
- Provide written justification of how these Locations do not meet the definition of BSLs.
 - Upload photographic evidence or equivalent supplementary documentation to justify that these Locations do not meet the definition of BSLs.
- d. These unserved / underserved locations within the selected Initial Project Area have been estimated to be prohibitively costly to serve with fiber and should be added to a new (unspecified) project area.
- Upload the CSV file containing the list of locations you would like modified. Your file will automatically be renamed upon upload using your entity's name and project area selection.
 - Specify the estimated cost per location.
 - Provide written justification of why these locations are prohibitively costly to serve. This should include an analysis of the relative cost to serve the locations in the Initial Project area.
 - Provide supplementary documentation to justify the high cost associated to serving these locations in the initial project area.

³⁰ Refer to the FCC description of Broadband Serviceable Location that can be found at the [Broadband Data Collection Help Center](#).

SECTION 4: SUBMITTING A BEAD FULL PROPOSAL

The Full Proposal process requires Prospective Subrecipients to submit a bid for providing broadband service to each Unserved and Underserved Location within the selected Final Project Area(s). For Prospective Subrecipients submitting a Full Proposal as part of a consortium, the lead member must submit the Full Proposal application for the entirety of the Final Project Area.

If Prospective Subrecipients submit any materials in their Full Proposal that they would like to be held confidential by VCBB, there will be an opportunity to upload a memorandum at the end of the Full Proposal that details that material and provides an explanation as to why such material should be exempted from disclosure under the Vermont Public Records Act (1 V.S.A. § 315 et seq.). All such documents must be clearly marked as confidential and the basis for the exemption, generally 1 V.S.A. § 317(15) exempting records concerning the negotiation of contracts. Bold red headers and footers on such records are preferable.

INITIAL INFORMATION

1. Provide the entity name, main office address, Unique Entity Identifier (UEI) assigned by SAM.gov, FCC Provider ID, State of Vermont Supplier Number (optional), Fiscal Year End Month (MM format), and the Primary Contact name, title, phone number, and email address.
2. Which type of entity do you represent? Select all that apply: electric cooperative, nonprofit organization, public-private partnership, private company, public or private utility, public utility district, local government, other (specify).
3. Select the Final Project Area(s) for which your entity will submit BEAD Full Proposals. (Select all that apply.)

GATING CRITERIA QUESTIONS

Managerial and Operational Capability

1. Upload a narrative of your current business that explains in detail how you are prepared to undertake a project of the scale you are proposing. Include at a minimum: (a) your history deploying the technology included in this proposal; (b) a description of your workforce and any operating partners that demonstrate you are capable of building, maintaining, and upgrading the proposed network; (c) lessons learned from past deployments; (d) any anticipated challenges you may face based on your prior experience; (e) past work utilizing federal or state broadband funding and evidence you successfully completed those projects or of your progress to-date; and (f) a statement explaining any enforcement actions in relation to past projects.
2. Check the box to certify that you possess the operational capability to complete and operate the proposed project
3. Upload resumes from your key managerial staff, including leadership, operations, and network construction staff, in a single document. You may also include resumes from

the key managerial staff of your contractors, subcontractors, or other partners as relevant to demonstrate managerial and operational capability for the proposed Project.

4. Upload an organizational chart detailing any parent, subsidiary, or affiliated entities.
5. Has your entity provided a voice, broadband, and/or electric transmission or distribution service for at least two consecutive years prior to the date of this proposal submission? If you are a wholly owned subsidiary of such an entity, explain.
 - If you selected **yes** or **we are a wholly owned subsidiary of such an entity**: Specify the number of years your entity or its parent company has been operating.
 - If you selected **no**: consistent with the [BEAD NOFO](#) (p. 75), you may submit evidence sufficient to demonstrate that as a newly formed entity you have obtained, through internal or external resources, sufficient operational capabilities. This may include project descriptions and narratives from contractors, subcontractors, or other partners with relevant operational experience, or other comparable evidence. Upload additional evidence if necessary, or direct reviewers to evidence already attached elsewhere in the application.
6. Has your entity operated only an electric transmission or distribution service?

If you selected **yes**: Upload qualified operating or financial reports that you have filed with the relevant financial institution for the relevant 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, as described in the BEAD NOFO (p. 75).
7. Do you certify that you have timely filed FCC Form 477s and the Broadband DATA Act submission, if applicable, as required during this period, and otherwise have complied with the FCC's rules and regulations?
 - If you selected **yes**: Upload a screenshot from the FCC Commission Registration System (CORES) website (<https://apps.fcc.gov/cores/userLogin.do>) that indicates that your entity complies with FCC requirements.
 - If you selected **no**: Explain any pending or completed enforcement action, civil litigation, or other matter in which your entity failed to comply or was alleged to have failed to comply with Commission rules or regulations.
 - If you selected **not applicable**: Explain why this requirement is not applicable to your entity.

Financial Capability

1. Does your entity have financial statements from the most recent fiscal year that are audited by an independent certified public accountant?
 - If you selected **yes**: Upload your audited financial statements from the prior fiscal year.
 - If you selected **no**: Upload your unaudited financial statements from the prior fiscal year.

2. Upload information that demonstrates sufficient funds are available for ongoing coverage of project and ongoing operational and administrative costs. This can include bank or credit union statements, open lines of credit, or other financial means by which you can demonstrate sufficient funding available. If you will be applying for multiple Final Project Areas, ensure that this information demonstrates sufficient funds are available for ongoing coverage of operational and administrative costs if all projects were to be awarded.
3. Upload a business plan for your proposal, current within the last six months, that is consistent with the detailed instructions in Addendum 1 of this RFA.
4. Will you be providing a Letter of Credit prior to award?
 - If you selected **yes**: Upload a letter from a bank or credit union that meets eligibility requirements consistent with those set forth in 47 CFR§ 54.804(c)(2) or Section 2.1 of NTIA's [Conditional Programmatic Waiver of the NOFO's Letter of Credit Requirement](#), (LOC Waiver) committing to issue you an irrevocable standby letter of credit, in the required form. At a minimum, the letter must reflect a commitment to provide a dollar amount of at least 25 percent of the value of the subaward and the issuing bank or credit union's agreement to follow the terms and conditions of VCBB model letter of credit in Addendum 2. You may skip question #5.
 - If you selected **no**: Will you be availing yourself of the option provided in the LOC Waiver to substitute the LOC requirement of the NOFO with a Performance Bond?
 - If you selected **yes**: Upload a copy of a letter from a company holding a certificate of authority as an acceptable surety on federal bonds as identified in Department of Treasury Circular 570, committing to issue you and/or you and your contractor with a Performance Bond in the full amount of the subaward.
 - Detail your successful and timely performance on any past state or federally funded broadband deployment projects. This should include the granting agency, grant amount, scope of work, and level of completion. If you have failed to successfully and timely perform on any state or federally funded broadband deployment projects, you will be required to have a Letter of Credit or performance bond to be eligible as a BEAD subrecipient.
5. Upload certification by an officer of your entity with authority to legally bind the entity that meets the following requirements:
 - Certifies that, if selected, you will submit annual audited financial statements prepared by an independent certified public accountant to VCBB within the earlier of 30 days of receiving your audited financial statements or nine months after the end of the audit period during the project.
 - If you did not include audited financial statements in this proposal, certifies that you will provide financial statements from the prior fiscal year that are audited by an independent certified public accountant if your proposal is selected for BEAD funding.

- Certifies that you will have sufficient financial resources (for example, loans, cash reserves, or BEAD matching funds) to cover your eligible costs for the project until such time(s) as VCBB authorizes disbursement.
- Certifies the truthfulness of the representations being made regarding the financial condition of your entity, upon careful review of the information provided herein.

Relevant Laws, Policies, and Requirements

1. Outline the work you have undertaken to familiarize yourself with the requirements of the Build America, Buy America Act (BABA) and describe how you intend to comply with this act.
2. Outline the work you have undertaken to familiarize yourself with the requirements of the National Environmental Policy Act (NEPA) and describe how you intend to comply with this act.
3. Check the box to certify that your entity will comply with all applicable federal and state laws, including laws related to labor and employment such as the Vermont Occupational Safety and Health Act laws as well as federal laws, environmental and historic preservation including the National Environmental Policy Act (NEPA), and federal and state procurement policies and rules including the Build America, Buy America (BABA) Act.
4. Check the box to certify that your entity will comply with 2 CFR Part 200—[Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards](#) (31 U.S.C. 503), also known as the Uniform Guidance.
5. Check the box to certify that your entity will permit workers to create worker-led health and safety committees that management will meet with upon reasonable request.

Information On Ownership and On Other Public Funding

Upload an attachment with the following information:

- Ownership information consistent with the requirements set forth in 47 CFR § 1.2112(a)(1)-(7), related to competitive bidding for telecommunications applications.
- Name of real party or parties in interest in the applicant or application, including a complete disclosure of the identity and relationship of those persons or entities directly or indirectly owning or controlling (or both) the applicant.
- Name, address, and citizenship of any party holding 10 percent or more of stock in the applicant, whether voting or nonvoting, common, or preferred, including the specific amount of the interest or percentage held.
- In the case of a limited partnership, the name, address and citizenship of each limited partner whose interest in the applicant is 10 percent or greater (as calculated according to the percentage of equity paid in or the percentage of distribution of profits and losses).

- In the case of a general partnership, the name, address and citizenship of each partner, and the share or interest participation in the partnership.
- List, in the case of a limited liability company, the name, address, and citizenship of each of its members whose interest in the applicant is 10 percent or greater.
- All parties holding indirect ownership interests in the applicant as determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain, that equals 10 percent or more of the applicant, except that if the ownership percentage for an interest in any link in the chain exceeds 50 percent or represents actual control, it shall be treated and reported as if it were a 100 percent interest.
- Any Federal Communications Commission-regulated entity or applicant for a Federal Communications Commission license, in which the applicant or any of the parties identified in paragraphs (a)(1) through (a)(5) of this section, owns 10 percent or more of stock, whether voting or nonvoting, common, or preferred. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the applicant (e.g., Company A owns 10 percent of Company B (the applicant) and 10 percent of Company C, then Companies A and C must be listed on Company B's proposal, where C is a Federal Communications Commission licensee and/or license applicant).
- Any other applications your entity and any affiliates have submitted or plan to submit related to broadband deployment during the prospective period of BEAD deployment. List the funds your entity has been provided under the Families First Coronavirus Response Act (Public Law 116-127; 134 Stat. 178); the CARES Act (Public Law 116-136; 134 Stat. 281), the Consolidated Appropriations Act, 2021 (Public Law 116-260; 134 Stat. 1182); or the American Rescue Plan of 2021 (Public Law 117-2; 135 Stat. 4), any federal Universal Service Fund high-cost program (e.g., Rural Digital Opportunity Fund, Connect America Fund), and any Vermont funding you have received for each broadband deployment project, including:
 - a. The speeds and latency of the broadband service to be provided (as measured and/or reported under the applicable rules) and how to ensure that these parameters will be maintained and reported.
 - b. The geographic area to be covered.
 - c. The number of Unserved and Underserved Locations committed to serve (or, if the commitment is to serve a percentage of Locations within the specified geographic area, the relevant percentage).
 - d. The amount of public funding to be used.
 - e. The cost of service to the consumer.
 - f. The matching commitment, if any, provided by your entity or your affiliates.

PROJECT OVERVIEW

1. Which Final Project Area are you applying for? (Select only one per proposal.)
2. Will your proposed project serve every Unserved and Underserved Location within the Final Project Area selected above?
 - If you selected **no**: Confirm that you understand that your project will not be considered for this Final Project Area. If there are no eligible Full Proposals received for this Final Project Area, VCBB may choose to negotiate with you under the process outlined in the “Project Areas Without Any Eligible Full Proposals” section of the “BEAD Full Proposal Review, Scoring, and Negotiation” document, but will not be obligated to negotiate with you.
3. Did you submit a Pre-proposal for this Final Project Area?
 - If you selected **no**: Confirm that you understand that your project will only be considered under the specific circumstances outlined in the Subrecipient Selection Process Overview section of this RFA.
4. Is your proposal for a Priority Broadband Project?
 - If you selected **yes**: Check the box to confirm that your project proposes to reach every Unserved and Underserved Location within the Final Project Area selected with end-to-end fiber.
5. Select the technology or technologies that you intend to deploy in this Final Project Area (select all that apply: fiber-to-the-premises, cable, DSL, licensed fixed wireless, satellite, other (specify). If your proposal is for a Priority Broadband Project, please note that you should only select “fiber to the premises.”
6. If you selected more than one technology from the list above, describe how the combination will be employed and what proportion of the network will be built with each technology indicated.
7. Are you submitting this proposal for this Final Project Area as a member of a consortium?
 - If you selected **yes**: who is the lead member of the consortium proposal?
 - If you are the lead member of the consortium, upload the signed memorandum of understanding between the parties.
8. Do you intend to include any served Locations as part of the final Project, in addition to the Unserved and Underserved Locations included within the Final Project Area?
 - If you selected **yes**: Upload a list of the served Locations within the Final Project Area that you would like to include as part of the final Project, as a CSV file. Note that these Locations may only equal up to 20 percent of the total Locations in the Project.
 - How many served Locations will you include in your Project?

- How many total Locations are included in your project (equal to the sum of Unserved Locations, Underserved Locations, and served Locations)?

PROJECT BUDGET

Complete the budget form, listing all proposed project costs using the following budget categories:

1. Total Personnel
 - Salary
 - Fringe
2. Travel
3. Equipment
4. Supplies
5. Contractual/Subawards
6. Other Direct Costs

Total Personnel should equal the sum of salary and fringe costs. Indicate which costs will be paid for with grant funds and which will be paid with matching funds.

TECHNICAL CAPABILITY CRITERIA

Technical Capability

1. Upload a network design in the form of a GIS file.
2. Upload a network diagram.
3. Upload a network map.
4. Upload a spreadsheet to accompany the network map listing the project Locations, current level of service, and expected date that service will be available.
5. Will your project require Middle Mile Infrastructure as defined in the “definitions” section of the RFA?
 - If you selected **yes**: Upload a PDF map of these routes accompanied by a detailed narrative explaining why they are necessary and the most efficient routes. Your network design must minimize BEAD outlays by taking the most efficient route to the Final Project Area.
 - Describe your plan to permit other broadband service providers to interconnect with your VT-BEAD funded Middle Mile Infrastructure network facilities on a just, reasonable, and nondiscriminatory basis 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 subrecipient’s Middle Mile Infrastructure to a requesting party’s facilities for the exchange of traffic. Include your plan to connect to the

public internet directly or indirectly and provide requesting parties with an ability to connect to the internet, to ensure that rates and terms for interconnection are reasonable and nondiscriminatory, and to negotiate in good faith with any requesting party making a bona fide request for interconnection.

6. Describe what, if any, additional services will be offered using the facilities deployed through the proposed project (for example, voice, video, etc.).
7. Explain your drop policy, including the standard installation charge and how you will ensure that service can be activated within 10 days of a customer request. "Drop" refers to the total cost (including labor, materials, equipment, etc.) associated with deploying the final segment of the network that connects the telecommunications infrastructure to the individual Location.
8. Upload a letter from a licensed professional engineer that includes the following components. If you need to upload more than one letter for different portions of the network that in combination represent the entire network, please upload the letters as a single document.
 - a. Certifies and endorses the above attachments and responses.
 - b. Certifies that the entity is technically qualified to complete and operate the project described within this proposal and capable of carrying out the proposed funded activities.
 - c. States that the proposed network can deliver broadband service that meets the requisite performance requirements to all Locations served by the project (100/100 Mbps or better throughput and less than 50 milliseconds of latency to on-grid Locations and to any off-grid Location that can be included while being cost-effective. For other off-grid Locations, the network must be capable of delivering 100/20 Mbps or better throughput and less than 100 milliseconds of latency).
 - d. Certifies that the proposed network will provide all consumers with services that adhere to standards that have been identified by the State in Vermont, including the consumer protection and net neutrality standards outlined in 3 V.S.A. § 348, transparent pricing, and data privacy.
 - e. States that the Prospective Subrecipient will have 72 hours of reserve backup power available for core sites (Optical Line Terminals, Central Office) and will offer residential consumers the opportunity to purchase 24-hour broadband backup power for their home.
 - f. For Priority Broadband Projects, the letter should additionally include the following:
 - i. Describe how the network design shows that the proposed network will support the NTIA performance requirements as well as VCBB [Outside Plant Design Standards](#).
 - ii. Explain the network design choice (Gpon, Xpon, CWDM, etc.) and why.
 - iii. Explain key considerations (splitter loading, fiber counts, etc.).

- iv. Explain hub Location considerations.
 - v. Describe risks and contingencies related to the technology plan.
 - vi. Explain the proposed key connection points and dependencies.
- g. For Wireless Non-Priority, Reliable Technology Projects, the letter should additionally include the following base station parameters:
- i. Antenna/Tower Location (latitude, longitude)
 - ii. Number of base stations on the tower
 - iii. Total backhaul capacity for the tower, e.g., one Gbps (dedicated or shared)
 - iv. Backhaul type: Fiber or Microwave
 - v. Backhaul provider name and proof of claimed backhaul capacity via a speed test.
 - vi. Antenna height (meters) and azimuth (degrees)
 - vii. Number of subscribers served by each base station on the tower
 - viii. Frequency band and frequency range of operation, e.g., Band 2, 41, 48
 - ix. Duplex type: Time Division Duplex or Frequency Division Duplex
 - x. Channel bandwidth, e.g., 10 MHz, 20 MHz, 40 MHz
 - xi. Transmit power in watts and decibel milliwatts
 - xii. Antenna gain in decibels
 - xiii. Effective isotropic radiated power (EIRP) in watts and decibel milliwatts
 - xiv. Oversubscription ratio and number of Locations in the Project that could be served at once
 - xv. Base station transmit power level and EIRP
 - xvi. The presence of any data caps, throttling, or de-prioritization of home broadband service in any of the plans offered in the Final Project Area
 - xvii. Propagation studies and maps that account for foliage, topography, line-of-sight to towers, and other obstacles to radio signal propagation.
 - xviii. Cable broadband must meet the following provisions
 - a. *Speed and latency testing* - Carriers must test the speed and latency of their subscribers' internet service from their premises to a remote test server. The median result of three speed tests taken on peak times during separate days is used to determine service levels.
 - b. Acceptance of cable qualification test results, including -
 - 1. Wiremap checks,
 - 2. Length verification,

3. Attenuation tests,
 4. Near-end crosstalk (NEXT),
 5. Return loss,
 6. DC loop resistance, and
 7. signal strength analysis.
- c. Network test results, including,
1. Cable testing (test for faults in cables, such as open circuits, shorts, and crossovers),
 2. Visual inspection,
 3. Connectivity tests, and
 4. Port tests.

Low-Cost Broadband Option

1. Certify the following by checking the corresponding box:
 - You agree to accept the Affordable Connectivity Program subsidy, if reinstated by Congress under this or by another name, including any applicable device subsidy program.
 - You will provide access to broadband service to each customer served by the project that desires broadband service on terms and conditions that are reasonable and non-discriminatory.
 - Your low-cost broadband option will be available to all low-income residents in the Final Project Area that meet the definition of “Eligible Subscribers” contained in the BEAD NOFO (p. 12). At a minimum, this option will provide broadband service of at least 100/20 Mbps and at most 100 milliseconds latency, with no data caps, that complies with the State’s consumer protection and net neutrality standards pursuant to 3 V.S.A. §.348. It will be available for 20 years, during which time the cost of this option may increase with the [Consumer Price Index](#) or another industry-recognized measure of inflation. Subscribers of this low-cost option will be allowed the opportunity to upgrade or change their service plan.
2. Briefly describe the parameters of your low-cost broadband option, including download and upload speed, latency, data cap policy, compliance with the State’s consumer protection and net neutrality standards pursuant to 3 V.S.A § 348, committed length of availability of this option, expected annual cost increase of this option, and any other relevant parameters.
3. What process will you use for marketing this option, and how will customer service staff be trained in assisting people with selecting this option?
4. What is the monthly price to the consumer of this low-cost service plan option? (In no instance may low-cost service plans exceed \$75/month.)
5. Plans at or below \$30/month will automatically fulfil the low-cost plan requirement. Plans

higher than \$30/month may be allowed to fulfil the low-cost service plan requirement, at VCBB's discretion. Is the monthly price to the consumer of this low-cost service plan option at or below \$30/month?

- If you selected **no**: include an explanation as to why you are asserting that a higher rate is reasonably necessary and what efforts you have undertaken to meet the \$30 per month plan over the BEAD-funded network prior to presenting a higher cost plan. This rationale must include documentation of income levels and any other demographic information you have relied on to determine the need to exceed the \$30/month amount, including information used to calculate the average revenue per user needs of the network, anticipated subscription rates for the general population in the Final Project Area, and anticipated low-income subscription rates in the Final Project Area. It must also include a showing that overall rurality and low population density of the proposed Final Project Area demands a higher monthly fee because of the higher cost of deployment. (You may upload attachments to answer this question.)

Middle Class Affordability Option

1. Detail the speed and retail price of all your service plans that will be available in the Final Project Area. Prices shall include additional fees (such as equipment rentals) that could be assessed against consumer accounts.
2. Identify which of these plans is a lower cost, lower speed tier that is available to any consumer in the Final Project Area and would be affordable to any consumer. Describe how these service plans in their entirety comprise a range of options for consumers.
3. Provide demographic data for the area that supports your conclusion that the lower cost, lower speed tier plan is affordable for the Final Project Area.
4. Outline your plan for reinvesting network revenues to help reduce customer rates.
5. Check the box to certify that you will continue to provide a range of service offerings, including the lower cost, lower tier option, for at least 20 years.

SCORING CRITERIA QUESTIONS

Minimal Bead Program Outlay

1. Total BEAD funding requested for this project.
2. Total matching funds committed for this project.
3. Will you be seeking a match waiver due to your total match being less than 25% of the total project cost? (If the percentage of total project cost that is composed of matching funds is less than 25%, then the answer to this question must be yes).
 - If you answered **yes**, justify the need for your entity to receive a match waiver in this Final Project Area. Examples of this justification could include demonstrating how requiring a 25% match could undermine the commercial feasibility, affordability, and sustainability of this projects and thus disincentivize investment

in higher-cost and/or lower-income rural areas, which would be contrary to the stated goals of the Infrastructure Act and the [BEAD NOFO](#).

4. What is the source of your matching funds?
 - a. Enter the dollar amount of your matching funds that have already been secured.
 - What is the source of your matching funds that have already been secured?
 - Upload evidence of the matching funds that have already been secured, such as financial records or a letter from a financial institution
 - b. Enter the dollar amount of your matching funds that have NOT already been secured.
 - What is the source of the matching funds that have not yet been secured? Describe your level of certainty that you would be able to secure these funds if you are chosen as a BEAD subrecipient.
 - Will you be seeking any additional financial support for this project, including any federal grants or contracts or contributions from communities to be served? Explain
5. Service reliability has proven to be a major challenge for Vermonters based on VCBB surveys conducted in 2023.³¹ Additionally, given the harsh winters experienced in Vermont and the effects of climate change on the state, the hazards to infrastructure of fluvial erosion, inundation flooding, and ice are expected to increase and pose threats to BEAD-funded infrastructure in the 20 years following deployment. Couple those hazards with an expected increase in extreme heat events and wildfires, and there is a clear need for reliable and resilient networks. VCBB will consider reliability and resiliency an integral component of the value of a project within the “minimal BEAD program outlay” scoring criterion. Considering these impacts, describe any factors in your project’s network design that might make your project more expensive, but also more scalable, resilient, or reliable. In answering this question, you may reference attachments you have provided in the “Meeting minimum qualifications for technical capability” section of the gating requirements, such as your network design, network diagram, outline of estimated project costs, or letter from a licensed professional engineer. You may upload an additional attachment if necessary. Include steps you are taking to ensure a redundant network that is interoperable with other networks and capable of supporting future growth, as well as plans to provide interconnection Locations. Describe your plan for monitoring, identifying, and responding to issues related to the management of the links between network head-ends, devices, and users, to identify congestion, maximize throughput, and improve network performance.
6. For projects that are not Priority Broadband Projects, describe the scalability and resiliency of your proposed technology.

³¹ See the [Vermont BEAD Five Year Action Plan](#).

Affordability

1. For Priority Broadband Projects: what will be the total monthly price to the customer for 1 Gbps/1 Gbps service in the Final Project Area? Include any additional fees (such as equipment rentals) that could be assessed against consumer accounts, but do not include any promotions or new customer rates.
2. For Other Last-Mile Broadband Deployment Projects: what will be the total monthly price to the customer for 100 Mbps/20 Mbps service in the Final Project Area? Include any additional fees (such as equipment rentals) that could be assessed against consumer accounts, but do not include any promotions or new customer rates.
3. Describe your commitment to affordability at the service level reported above (1 Gbps/1 Gbps or 100 Mbps/20 Mbps) into the future. For example, your entity could commit to maintain the same price for 10 years; your entity could commit to serve all included Locations in the Final Project Area at a price no higher than the median price for all 1Gbps/1Gbps (or 100 Mbps/20Mbps) service offerings reported in the most recent year's FCC Urban Rate Survey, adjusted annually based on release of the data from the FCC, for 10 years; your entity could describe how its business structure reinvests revenue into affordability; or your entity could certify that it will offer service to the identified Locations in the Final Project Area at the same rates and terms and conditions or better than offered to your existing customers for 10 years.

Fair Labor Standards

1. Provide the following documentation of your past record of labor standards, protections, and violations, if applicable:
 - a. Provide a narrative describing your entity's compliance with state and federal labor and employment laws on broadband deployment projects in the last five years (or since inception, if less than five years).
 - b. Disclose your and your contractors' safety protocols and record for the past five years, including record of fatal accidents, serious injuries, days between lost time injuries, workers compensation premiums, safety observations, safety training, and tailboard records and policies.
 - c. Disclose any instances in which your entity or its contractors or subcontractors have been found to have violated laws such as the State and Federal Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding five years (or since inception, if less than five years).
 - d. Disclose any pending litigation related to alleged violations of state or federal labor and employment laws by your entity.
 - e. Disclose any official labor relations complaints acquired by your entity in the past four years.

2. Describe your approach to ensure labor standards and protections during the BEAD Program:
 - a. Describe your policies and standard operating procedures to ensure compliance with state and federal labor protection laws and regulations, including those listed at by the [Vermont Department of Labor's Wage & Hour Program](#).
 - b. Describe your applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network.
 - c. Describe how you will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.
 - d. Describe how you will ensure ongoing compliance and commitment to labor standards and protections. If you are a new entity, use this opportunity to make specific, forward-looking commitments to strong labor and employment standards and protections with respect to BEAD-funded projects, to mitigate the lack of an ability to provide a record of labor and employment law compliance for scoring in this criterion.
3. Describe your plan to recruit from historically underrepresented populations facing labor market barriers for apprenticeships and training programs, and to prioritize hiring local workers.
4. Check the box to certify that you will use an appropriately skilled and credentialed workforce.
5. Demonstrate your plan for ensuring that the project workforce will be an appropriately skilled and credentialed workforce by providing the following information.
 - a. Document the required skills, level of experience, and certifications for full-time positions.
 - b. Describe how you will ensure the use of an appropriately skilled workforce (e.g., through Registered Apprenticeships or other joint labor management training programs that serve all workers).
 - c. Describe the steps you will take to ensure that all members of the project workforce will have appropriate credentials (e.g., appropriate and relevant occupational training, certification, and licensure) and if you will require such credential for hiring or if you will support employees to attain such credentials.
 - d. Describe your plan for workforce readiness, retention, and ensuring a quality work environment.
 - e. Describe your customer service training program and accountability measures to ensure quality customer service.
 - f. Describe whether your workforce will be directly employed or whether work will be performed by a subcontracted workforce.

- g. List the entities that you plan to contract and subcontract with in carrying out the proposed work and describe their capabilities, or the process that will be used to select these entities and evaluate their capabilities.
 - h. Upload subcontractor reference checks to include analysis of vendor labor performance, including employee satisfaction surveys results, rates of absenteeism and employee turnover, and anticipated reference checks for future subcontractors.
6. Is your workforce unionized?
- a. If you selected **yes**: Skip the following set of questions.
 - b. If you selected **no**: List the job titles required to carry out the proposed work (including contractors and subcontractors) over the course of the project. For each job title, provide the following: (this will be entered into a chart)
 - The size of workforce with this job title (full-time employment positions, including for contractors and subcontractors)
 - The entity that will employ this job title.
 - Safety training, certification, and/or licensure requirements for this job title (e.g., Occupational Safety and Health Act 10, Occupational Safety and Health Act 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications and titles.
 - Information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.
7. Upload a certification from an Officer/Director-level employee (or equivalent) with the following components:
- a. Certifying consistent past compliance with federal labor and employment laws by the subrecipient, as well as all contractors and subcontractors, or explaining why this is not applicable to your entity.
 - b. Certifying a commitment to participate in and recruit from VCBB Apprenticeship Program.

Community Input and Engagement

Demonstrate that your proposed project reflects substantive engagement with the residents in the area you propose to serve to ensure your service meets the needs of the community, as well as a commitment to conduct regular engagement into the future. Upload any of the following documentation that is relevant. You will need to provide compelling evidence in 4 of the following categories to receive points for this criterion:

- 1. Upload letter(s) of support from community organizations, members, and/or local government, if applicable.

2. Upload minutes from several or more public meetings of municipalities that show substantive and reciprocal engagement over multiple months and that local officials in the Final Project Area engaged in a planning process, if applicable.
3. Upload one or more reports that have been previously submitted to the governance bodies in the communities in the Final Project Area and evidence of two-way community discussions, if applicable.
4. Upload documentation showing how community members are engaged in and contributing to development of plans in the project on an ongoing basis, if applicable.
5. Describe your entity's governance structure and how it involves community members in regular and routine decision making for the project, if applicable.
6. Describe your plans to continue to engage local communities, if applicable.
7. Has VCBB explicitly approved any additional types of evidence you will be offering as a substitute for any of the above items? If you selected yes, provide the evidence.

Local Coordination

Demonstrate that your proposed project reflects coordination with local municipalities and regional planning commissions for the proposed Final Project Area, consistency with state broadband planning efforts to date, and a plan for ongoing local coordination into the future. Upload any of the following documentation that is relevant. You will need to provide compelling evidence in 3 of the following categories to receive points for this criterion.

1. Upload evidence of a written commitment to the project from all towns in the Final Project Area, if applicable.
2. Upload substantive reports and communications between your entity and municipalities in the Final Project Area, if applicable.
3. Upload examples and evidence of municipal or regional entities contributing to project planning on a recurring basis during the preparation of your BEAD subrecipient proposal, if applicable.
4. Upload examples of municipal and regional entities pledging services and funds to the development of the Final Project Area, if applicable.
5. Upload appointment letters of citizens to governance committees of the applicant, if applicable.
6. Has VCBB explicitly approved any additional types of evidence you will be offering as a substitute for any of the above items? If yes, provide the approved evidence here.

Speed to Deployment

Do you intend to begin providing broadband service to each customer that desires broadband service before the end of the four-year period allowed under the BEAD program for deployment? Speed to deployment is measured from the date the subrecipient receives a signed VT-BEAD grant agreement.

- If you selected **yes**: upload a binding commitment to provision and begin providing broadband service to each customer that desires broadband service by a certain date specified before the end of the four-year period allowed under the BEAD program for deployment. You will be awarded one point for each year that is less than the four years permitted under the BEAD program, for a maximum of two points.

Speed of Network and Other Technical Capabilities

If you are proposing a Priority Broadband Project, skip this section.

1. What percentage of the homes in your network will be served with Fiber to the Premises? You will receive one point for every 10% of fiber in the network.
2. For all Other Last-Mile Broadband Deployment Projects, describe the speeds, latency, and other technical capabilities of the technologies you propose to use. Include ease of scalability, amount of future investment required, costs to upgrade, and capital asset cycles.
3. If applicable, upload evidence to demonstrate the speed and latency that your proposed technology achieves in other areas where you have deployed it. Describe your commitment to upgrade technology as it evolves to deliver faster speeds.

FINAL QUESTIONS

1. Is there any other information you deem relevant to the evaluation of gating or scoring criteria for your proposal?
2. If there are any materials in your Full Proposal that you would like to be held confidential by VCBB, upload a memorandum that details that material and provides an explanation as to why such material should be exempted from disclosure under the Vermont Public Records Act (1 V.S.A. §315 et seq.).
3. Final certification and submission.

SECTION 5: GRANT TERMS & CONDITIONS

GRANT CONDITIONS AND REQUIREMENTS

Prior to Signing a Grant Agreement

- If the Subrecipient did not provide audited financial statements from the prior fiscal year as part of its proposal, the Subrecipient must provide financial statements from the prior fiscal year if its proposal is selected.
- If the Subrecipient has opted to provide a Letter of Credit, prior to entering into any grant agreement, they shall provide an irrevocable standby letter of credit for 25 percent of the value of the subaward, modeled on the VCBB Model Letter of Credit in Addendum 2. In addition, they shall provide an opinion letter from legal counsel providing, subject only to customary assumptions, limitations, and qualifications, that in a proceeding under Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”), the bankruptcy court would not treat the Letter of Credit or proceeds of the Letter of Credit as the property of the Subrecipient’s bankruptcy estate under Section 541 of the Bankruptcy Code.
- If the Subrecipient has opted to provide a Performance Bond, prior to entering into any grant agreement, they shall obtain a Performance Bond for 100 percent of the value of the subaward.
- The Subrecipient must certify compliance with the cybersecurity and supply chain risk management requirements, as outlined in the [BEAD NOFO](#) (p. 70–71).
 - All Prospective Subrecipients must prepare a cybersecurity risk management plan and have the plan in place prior to receiving a BEAD subaward if the Subrecipient is providing service to the area already, or the Prospective Subrecipient must demonstrate that it is ready to be operationalized upon providing service if it is not yet providing service to the area.
 - The cybersecurity risk management plan must reflect the latest version of the National Institute of Standards and Technology Framework for Improving Critical Infrastructure Cybersecurity (currently Version 2.0) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented.
 - The cybersecurity risk management plan must be submitted to VCBB prior to signing a grant agreement. If the Subrecipient makes any substantive changes to the plan, a new version must be submitted within 30 days.
 - The cybersecurity risk management plan must be reevaluated and updated on a periodic basis and as events warrant.
 - To the extent a Subrecipient relies in whole or in part on network facilities owned or operated by a third party (e.g., purchases wholesale carriage on such facilities), the Subrecipient must also submit the above attestations from its network provider.

- All Prospective Subrecipients must prepare a supply chain risk management plan. As with the cybersecurity risk management plan, the supply chain risk management plan must be in place prior to award of the grant if the Subrecipient is providing service to the area already; or the Subrecipient must demonstrate that it is ready to be operationalized upon providing service. Supply chain risk management plans must meet the following requirements:
 - Supply chain risk management plans must be based on the key practices in the National Institute of Standards and Technology publication NIST IR 8276, [Key Practices in Cyber Supply Chain Risk Management: Observations from Industry](#) (February 2021) and related Supply Chain Risk Management guidance from National Institute of Standards and Technology, including NIST SP 800-161 Rev. 1, [Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations](#) (May 2022), with specification of the supply chain risk management controls being implemented.
 - The supply chain risk management plan must be submitted to VCBB prior to signing a grant agreement. If the subrecipient makes any substantive changes to the plan, a new version must be submitted within 30 days.
 - The supply chain risk management plan must be reevaluated and updated on a periodic basis and as events warrant.
 - To the extent a Subrecipient relies in whole or in part on network facilities owned or operated by a third party (e.g., purchases wholesale carriage on such facilities), the Subrecipient must also submit the above attestations from its network provider.
- Prior to commencement of work and release of any payments, grantee must submit the following:
 - A Certificate of Insurance in accordance with [the State of Vermont's Insurance Specifications](#).
 - A current [IRS Form W-9](#), Request for Taxpayer Identification Number and Certification, signed within the last six months.
 - Documentation verifying pledged matching funds
- Prior to any distribution of any funding, each subrecipient must agree, by binding commitment, to abide by the nondiscrimination requirements set forth in the following legal authorities, to the extent applicable, and to acknowledge that failure to do so may result in cancellation of any award and/or recoupment of funds already disbursed:
 - Title VI of the Civil Rights Act
 - Title IX of the Education Amendments of 1972
 - The Americans with Disabilities Act of 1990
 - Section 504 of the Rehabilitation Act of 1973
 - The Age Discrimination Act of 1975
 - Any other applicable non-discrimination law(s)
 - All applicable state and federal laws, including [VCBB policies](#).

Before Construction Begins

The Subrecipient must receive VCBB approval for the Subrecipient's Detailed Designs for their first construction area to ensure that they conform with the Outside Plant Design standards. Subrecipient will be required to submit GIS files of the final design for each competed distribution area along with final inspection results.

During Construction

- Subrecipient must conduct construction site visits to ensure labor standards and protections are followed.
- VCBB will provide resources and guidance to BEAD Subrecipients to facilitate their recruitment of Minority and Women Owned Business Enterprises (M/WBE) and labor surplus area firms (LSAF) for subcontracts, including a compiled list of relevant businesses in each of these categories. BEAD Subrecipients must conduct outreach to that curated list of businesses regarding pertinent solicitations, and additionally post as relevant to communities that reach M/WBEs and LSAFs, including Vermont Releaf Collective (vtreleafcollective.org), AALV (aalv-vt.org), Vermont's two NAACP chapters in Rutland and Springfield, and Vermont Works for Women (vtworksforwomen.org). Subrecipients must shape their scopes of work for solicitations in a way that allows for a potential vendor to propose to cover a discrete subset of the scope, not necessarily the entire scope, and establish delivery schedules that encourage participation by M/WBEs and LSAFs and do not require completing a prohibitively large proportion of the work prior to receiving funding, as feasible. This makes it more feasible for smaller firms to successfully propose to do the work.

After Construction Is Complete

- As required by the [BEAD NOFO](#) (p. 69), in the event that a Subrecipient can no longer provide broadband service to the end user Locations covered by the subaward, Vermont, in consultation with NTIA, will require the Subrecipient to sell the network capacity at a reasonable, wholesale rate on a nondiscriminatory basis to one or more other broadband service providers or public-sector entities or sell the network in its entirety to a new provider who commits to providing services under the terms of the BEAD Program, subject to approval by VCBB, NTIA, and any other federal entity with authority to review the acquisition. In the case of the dissolution of a Vermont Communications Union District (CUD), any such fiber assets may become the property of the State to be managed by VCBB.
- Performance must be demonstrated, verified, and documented at the customer site.

Award Conditions

- Any municipally organized entity that can issue public bonds and that is not offering a Letter of Credit or a Performance Bond will have a special award condition from the VCBB requiring the entity to certify that they will seek bonds or another financial instrument to cover any cost necessary to complete the agreed upon scope of work.

Alternatively, a municipally-organized entity that can issue public bonds and is offering to require that a party it is contracting with provide a Performance Bond covering 100% of the amount of the VT-BEAD subaward will have a special award condition from VCBB requiring the entity to certify that they will seek bonds or another financial instrument to cover any cost necessary to complete the agreed upon scope of work.

- As required by the [BEAD NOFO](#) (p. 69), any Subrecipient that has received VT-BEAD funds for construction of Middle Mile Infrastructure must permit other broadband service providers to interconnect with its funded Middle Mile Infrastructure network facilities on a just, reasonable, and nondiscriminatory basis. Such interconnection must be allowed 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 subrecipient's Middle Mile Infrastructure to a requesting party's facilities for the exchange of traffic. In addition, subrecipients 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, and negotiations with any requesting party making a bona fide request for interconnection must be in good faith.
- As required by the [BEAD NOFO](#) (p. 69), in the event that a Subrecipient can no longer provide broadband service to the end user Locations covered by the subaward, VCBB, in consultation with NTIA, will require the subrecipient to sell the network capacity at a reasonable, wholesale rate on a nondiscriminatory basis to one or more other broadband service providers or public-sector entities or sell the network in its entirety to a new provider who commits to providing services under the terms of the BEAD Program, subject to approval by VCBB, NTIA, and any other federal entity with authority to review the acquisition.
- Subrecipient must agree to VCBB monitoring, including regular meetings to discuss project progress and VCBB site visits of Subrecipient deployment projects, in addition to the reporting outlined below.
- VCBB reserves the right to include specific award conditions later. VCBB will convey any changes to subrecipients along with the reason for the change and the specific timeframe in which the revised specific award conditions will take effect.
- Subrecipient must comply with the following terms and conditions throughout the duration of the grant:
 - State of Vermont Attachment C: [Standard State Provisions for Contracts and Grants](#)
 - 2 CFR Part 200—[Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards](#) (31 U.S.C. 503), also known as the Uniform Guidance
 - Department of Commerce [Financial Assistance Standard Terms and Conditions](#)
 - Any other terms and conditions incorporated by reference or fully set forth in the grant agreement.

REPORTING REQUIREMENTS

Failure to adhere to reporting requirements and deadlines may disqualify the subrecipient from future grant opportunities. VCBB is required by the [BEAD NOFO](#) (p. 90) to make every report submitted to it by a subrecipient available to NTIA upon request. Additionally, information submitted in any report to VCBB will be a public record. If the Subrecipient considers any information in the report to be a trade secret protected, the Subrecipient may request that trade secret information be kept confidential and must specifically label the information for which the claim is made. VCBB shall notify the Subrecipient if a public records request is made for the information claimed as protected by the subrecipient. The Subrecipient may then proceed to obtain judicial protection for the information. VCBB reserves the right to modify reporting requirements during the project. At a minimum, reporting requirements will include the following:

Quarterly Reporting

Subrecipients must report quarterly to VCBB on their progress to ensure that sufficient progress is being made towards each construction and/or other specifically identified milestone in the deployment in accordance with the provisions of their grant agreement.

Regular Reporting

- Regular reporting must include an update on how the subrecipient is ensuring a high-quality and safe work environment, including any recruitment from diverse populations, labor area surplus firms, and apprenticeship programs; training offered to workers; labor violations; workforce and safety practices; and any other metrics needed to ensure high-quality jobs and careers are fostered by the BEAD Program. Subrecipients will also need to include in regular reporting the site visits they have conducted to ensure labor standards and protections are adhered to.
- Regular reporting must include any Minority Business Enterprises, Women Business Enterprises, and labor area surplus firms that the subrecipient has contracted with; a description of the efforts that have been taken to solicit bids from these businesses and to reach out to communities that reach these businesses; and to structure bids in a divisible way so that smaller firms can bid on portions of the work.
- Regular reporting must also include all components outlined in the [BEAD NOFO](#) (p. 90–92).

Annual Reporting

- VCBB will require subrecipients to submit annual audited financial statements prepared by an independent certified public accountant to VCBB within the earlier of 30 days of the subrecipient receiving their audited financial statements or nine months after the end of the audit period during the project.
- Annual reporting must include the pricing tiers of service the subrecipient offers so that VCBB can ensure broadband connections remain affordable for middle class families throughout Vermont.

Milestone Reporting

- Final “as built” network designs must be provided upon the completion of construction.
- Subrecipients will be required to report if they fail to meet interim build-out milestones within 10 business days of missing the applicable milestone deadline.

SUBRECIPIENT & PROJECT MONITORING

VCBB will closely monitor subrecipient projects, as required by the State of Vermont and the federal government. Subrecipient monitoring may include, but is not limited to, subrecipient risk assessments, subrecipient reporting, meetings with subrecipients and/or subcontractors, desk reviews, requests for documentation, site visits, speed tests, and field inspections. VCBB will conduct network inspections before certifying project completion.

GRANTEE PAYMENT SCHEDULE

Use of Initial 20 Percent of Funding

Vermont’s total allocation of BEAD funding is \$228,913,019.08. Consistent with Section IV.B.8. of the [BEAD NOFO](#), Vermont may use up to the first 20 percent of its BEAD funding allocation for the deployment of last mile broadband infrastructure to Unserved and Underserved Locations prior to the NTIA’s approval of Vermont’s Final Proposal for BEAD funding, given that the areas funded meet the following conditions:

- Consist of a least 80 percent Unserved Locations; and
- Are in Locations in which the percentage of individuals with a household income at or below 150 percent of the poverty level applicable to a family of the size involved (as determined under Section 673(2) of the Community Services Block Grant (42 U.S.C. 9902(2)) is higher than the national percentage of such individuals.

According to the 2023 [Current Population Survey Annual Social and Economic Supplement](#), approximately 19.4 percent of the United States population (64,764,000 out of 328,191,000 individuals) is living below 150 percent of the poverty level. (This includes all people living in primary families, living in unrelated families, and unrelated individuals.)³²

VCBB intends to fund BEAD deployment projects at the project area level (roughly CUDs, or towns where no CUD is formed). The VCBB has identified two CUDs which meet the requirement with more than 19.4 percent of the population living below 150 percent of the poverty level:

³² [POV-01. Age and Sex of All People, Family Members, and Unrelated Individuals](#). Source: [Current Population Survey \(CPS\)](#) Annual Social and Economic (ASEC) Supplement, 2023. The CPS is a joint effort between the Bureau of Labor Statistics and the Census Bureau.

CUD	Percentage of Individuals Living Below 150% Poverty Level
Deerfield Valley	23.64%
NEK Broadband	22.17%

There is one town in Vermont, Warren, which has more than 19.4 percent of individuals living in households below the 150 percent of poverty level and at least 80 percent of Locations Unserved.

Non-CUD Town	Percentage of Individuals Living Below 150% Poverty Level
Warren	50.30%

The VCBB intends to make the initial 20 percent of BEAD funding available to extend high-speed broadband services to the Unserved Locations in these three areas—Deerfield Valley CUD, NEKCV Broadband CUD, and Warren—prior to approval of Vermont’s Final Proposal by the NTIA.

To the extent that any portion of Vermont’s first 20 percent of BEAD allocation remains, the VCBB intends to use these funds to support deployment of last-mile broadband infrastructure in other Unserved and Underserved Locations, which have similar, albeit slightly lower, poverty levels. Below are examples of CUD with slightly lower poverty levels and poverty levels, but a significant number of Unserved Locations.

CUD	Percentage of Individuals Living Below 150% Poverty Level
Southern Vermont CUD	19.31%
Otter Creek CUD	19.20%
Lamoille FiberNet CUD	18.56%

The use of this initial 20 percent of funding will enable construction to begin as soon as possible to the communities in the state with the most need.

Fixed Amount Subawards

In NTIA’s policy notice titled [Tailoring the Application of the Uniform Guidance to the BEAD Program](#) (12/26/2023), NTIA holds that the BEAD competitive subrecipient selection process will allow states to establish fixed amount subawards for broadband infrastructure projects that are based on a reasonable estimate of actual costs, subject to the requirement that each state monitor “the reasonableness of the subrecipient costs.” As such, VCBB intends to utilize fixed amount subawards to reduce the program’s administrative costs and

promote broad participation in the VT-BEAD program. VCBB may award subawards on a cost reimbursement basis if specific cases warrant this type of agreement.

A fixed amount subaward is a type of subaward agreement where payments are based on meeting specific requirements of the award, such as project milestones, performance measurements, or defined results, rather than actual costs incurred. This type of award reduces some of the administrative burden for both the recipient (VCBB) and subrecipient. Utilizing fixed award subawards renders some requirements in 2 CFR 200 inapplicable, as described below.

- **Cost Principles:** Many federal cost principles (2 CFR 200 Subpart E) do not apply as compliance requirements to fixed amount subawards. Instead, the cost principles or other pricing information are used as a guide when budgeting for the work that will be performed under the fixed amount subaward. (As outlined in 2 CFR 200, §§ [200.400\(g\)](#), [200.402](#) through [200.405](#), and [200.407\(d\)](#) do apply to fixed amount awards.)
- **Procurement:** Subrecipients that receive a fixed amount subaward are not required to comply with the procurement standards of the Uniform Guidance. The State of Vermont may require subrecipients to meet state procurement standards.
- **Property Standards:** Fixed Award Subrecipients that receive a fixed amount subaward have more flexible property standard options including exceptions, adjustments, and clarifications for fixed amount subawards, including title, management and use requirements, liens, encumbrance and disposition.

Monitoring for Fixed Subawards

Fixed amount subawards may reduce the administrative burden for subrecipients but require robust monitoring from the VCBB to mitigate fraud, waste, and abuse. VCBB's monitoring responsibility also means monitoring the non-federal share required by the subaward agreement. In alignment with NTIA's requirements, VCBB shall require the subrecipients to use subaward payments only for the reimbursement of eligible costs in connection with the broadband deployment projects for which the payment is intended.

As required by the BEAD Program, VCBB will monitor award activities for common fraud activities, including but not limited to:

- False claims for materials and labor;
- Bribes related to the acquisition of materials and labor;
- Product substitution;
- Mismatching or mislabeling on products and materials; and
- Time and materials overcharging.

Payment Schedules

- In accordance with NTIA guidelines, VCBB will utilize a performance-based reimbursement method of payment in which payments will be made as subrecipients meet project milestones and objectives.
- Funding deployment projects on a reimbursement basis allows the VCBB to withhold funds if the subrecipient fails to take the actions the funds are meant to subsidize.
- VCBB will consider requests included within a Prospective Subrecipient's proposal to reimburse for administrative costs as an initial milestone. This may include allowing subrecipients to seek reimbursement for costs associated with post-award activities such as environmental reviews, compliance with requirements that are part of the BEAD program but not part of the Subrecipient's normal business operations, and other activities related to preparing to be a VT-BEAD Subrecipient. Administrative costs must be categorized as direct costs and directly tied to the grant-funded project to be reimbursable. VCBB cannot reimburse subrecipients for indirect costs (also known as facilitates and administrative or overhead costs).
- VCBB will retain five percent of an award or \$1,000,000, whichever is greater, until all subaward obligations have been met and the project is certified complete.
- It is the responsibility of the subrecipient to ensure that all contractors and/or subcontractors adhere to the applicable state and federal program rules and regulations.

Missed Milestones and Non-Compliance

- Subrecipients must notify VCBB if they will not meet a project milestone. In such cases, VCBB may grant an extension of time. If a subrecipient fails to meet the revised milestone date, VCBB may assess a penalty.
- VCBB will withhold any funding associated with missed milestones until such time as the subrecipient comes into compliance with the requirements. Failure to meet milestone obligations may result in the VCBB imposing penalties, including but not limited to suspending payments, terminating the grant agreement and/or recapturing grant funds.
- The grant agreement will include a clawback provision (a provision allowing recoupment of funds previously disbursed). A subrecipient's failure to fulfil its obligations under the grant may result in a clawback of funding provided to the subrecipient and/or additional penalties for non-performance. The VCBB will determine the amount of the funding subject to clawback based on the level of noncompliance by the subrecipient.

ADDENDUM 1: DETAILED BUSINESS PLAN INSTRUCTIONS

Your business plan must substantiate the sustainability of your proposed BEAD project(s). If you are submitting proposals for multiple Final Project Areas, you may submit one single business plan if the business plan clearly outlines the viability of receiving any one or any combination of the Final Project Areas proposed. This outline is written for Priority Broadband Projects. For Other Last-Mile Broadband Deployment Projects, provide the most equivalent metrics for your technology type.

Your business plan must include the following elements at a minimum:

COVER

- Who produced the plan?
- Date of initial Plan
- Date of latest update (must be within the last 6 months)
- Financial institution that reviewed feasibility study, if applicable

EXECUTIVE SUMMARY

- Does your plan cover every Unserved and Underserved BSL in each Final Project Area you propose to serve? How many Unserved and Underserved Locations are in each proposed Final Project Area?
- What other entities are you working with (contractors, subcontractors, or other partners) that will ensure a build-out to ALL Unserved and Underserved Locations?
- Provide a brief overview of the operating model.
- Provide the total Project cost – Divided by consortium members if necessary.
- Anticipated pole mileage constructed each year and in total.
- Anticipated BEAD-eligible and total passings constructed each year and in total.
- Overall project mileage broken down by proposed and existing:
 - Middle mile
 - Aerial mileage
 - Underground mileage (assumptions if not known)
- Year 5 take rate and take rate assumption rationale.

CAPITAL BUDGET

Provide an overall budget broken down by the following:

1. Engineering costs
2. Project management
3. Overhead
4. Material costs
5. Contingency
6. Middle mile fiber
 - a. Aerial
 - b. Underground
7. Retail fiber (providing service)
 - a. Aerial
 - b. Underground
 - c. Drops³³
8. Any other relevant capital costs

FINANCIAL PRO FORMA

At a minimum, include the following in your pro forma:

1. Facilities costs (all-in)
2. Administration costs
3. Marketing expenses
4. Technical support (call center, field tech support – onsite) costs
5. Debt service cost
6. Debt service coverage ratio
7. Property taxes
8. Operations and maintenance costs
9. All other costs

³³ The cost to the Prospective Subrecipient to deploy drops to be able to activate service at every Location within the Project within 10 days of a consumer request, and with the total cost to consumer being no more than the standard installation fee.

10. Revenue plan: include take-rate details
11. Funding assumptions and strategy
 - Loan and/or bond rates
 - IRR
12. Cash-flow positive date
13. Loan payoff date
14. Market analysis
15. Pro forma analyses and at least three years of operating cost and cash flow projections beyond the four-year implementation period of the project
16. Date at which the proposed project will be Net Present Value Positive

TIMELINE

- A build-out timeline and interim milestones for project implementation. Note that these interim milestones may form the basis for grant payment milestones for selected subrecipients.
- A capital investment schedule demonstrating complete build-out and the initiation of service within four years of the date on which the entity receives the subaward.

RISK AND CONTINGENCY PLAN

1. Financial
2. Labor needs and availability
3. Equipment and materials (supply chain management)
4. Make-ready timelines
5. Contractor management plan

ADDENDUM 2: MODEL LETTER OF CREDIT

Bank Letterhead

IRREVOCABLE STANDBY LETTER OF CREDIT No. [Specific Letter Reference Information]

Issuing Bank Name
Address of Issuing Bank

Date of Issuance: [Insert Date]
Grant Amount: [Insert Award Amount]
Expiration Date: [One year from issuance]
Project Area: [Name]

BENEFICIARY

Vermont Community Broadband Board
Attn: Broadband Equity Access and Deployment Program
112 State Street
Montpelier, VT 05620-2601

We hereby establish, at the request and for the account of [Broadband Equity Access and Deployment (BEAD) Program Subrecipient] in your favor, as required under the BEAD Notice of Funding Opportunity, adopted on May 13, 2022, issued by the National Telecommunications and Information Administration (“NTIA”), NTIA-BEAD-2022 (the “BEAD NOFO”), our Irrevocable Standby Letter of Credit [Specific Letter Reference Information] in the amount of [Insert amount in words dollars and no cents; amount in numbers].

This Letter of Credit shall automatically renew for one (1) year periods from the then current Expiration Date unless [Issuing Bank Name] gives written notice of non-renewal to the Vermont Community Broadband Board (“VCBB”) by a nationally recognized overnight delivery service with a copy to VCBB, 112 State Street, Montpelier, VT 05620-2601, at least sixty (60) days but not more than ninety (90) days prior to the expiry thereof, or such earlier date as the Letter of Credit is terminated by VCBB (the “Expiration Date”). Capitalized terms used herein but not defined herein shall have the meanings accorded such terms in the BEAD NOFO.

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

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

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

This Letter of Credit shall be canceled and terminated upon receipt by us of the VCBB's certificate purportedly signed by two (2) authorized representatives of VCBB and countersigned by the VCBB's authorized signatory in the form attached as Annex C.

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

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

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

[Signature]

[Name of signatory]

[Title of Signatory]

ANNEX A: FORM OF DRAFT

To: [Name of Issuing Bank]

DRAWN ON LETTER OF CREDIT [Specific Letter Reference Information]

AT SIGHT

PAY TO THE ORDER OF VERMONT COMMUNITY BROADBAND BOARD (VCBB) BY CHECK OR WIRE TRANSFER OF FEDERAL RESERVE BANK OF NEW YORK FUNDS

TO:

Account (_____)

As BEAD Fund Program Repayment

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

[AMOUNT IN NUMBERS]

Vermont Community Broadband Board

By: _____

Name: _____

Title: _____

ANNEX B: DRAW CERTIFICATE

The undersigned hereby certifies to [Name of Issuing Bank] (the “Bank”), with reference to (a) Irrevocable Standby Letter of Credit No. [Specific Letter Reference Information] (the “Letter of Credit”) issued by the Bank in favor of the Vermont Community Broadband Board (“VCBB”) and (b) the BEAD NOFO, adopted on May 13, 2022, issued by the National Telecommunications and Information Administration, NTIA-BEAD-2022, pursuant to which [Broadband Equity Access and Deployment (BEAD) Program Subrecipient] has provided the Letter of Credit (all capitalized terms used herein but not defined herein having the meaning stated in the BEAD NOFO), that:

[Broadband Equity Access and Deployment (BEAD) Program Subrecipient] has [Describe the event that triggers the draw.], which is evidenced by a letter signed by the Chair of the VCBB or his/her designee, dated _____, 20__, a true copy of which is attached hereto. Accordingly, a draw of the entire amount of the Letter of Credit No. [Specific Letter Reference Information] is authorized.

OR

VCBB certifies that given notice of non-renewal of Letter of Credit No. [Specific Letter Reference Information] and failure of the account party to obtain a satisfactory replacement thereof, pursuant to the VCBB’s Request for Proposal’s Terms and Conditions for subrecipients in the BEAD Program [specific document reference for Vermont BEAD RFP], VCBB is entitled to receive payment of \$_____, representing the entire amount of Letter of Credit No. [Specific Letter Reference Information].

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

ANNEX C: CERTIFICATE REGARDING TERMINATION OF LETTER OF CREDIT

The undersigned hereby certifies to [Name of Issuing Bank] (the “Bank”), with reference to (a) Irrevocable Standby Letter of Credit No. [Specific Letter Reference Information] (the “Letter of Credit”) issued by the Bank in favor of the Vermont Community Broadband Board (“VCBB”), and (b) the BEAD NOFO, adopted on May 13, 2022, issued by the National Telecommunications and Information Administration, NTIA-BEAD-2022, (all capitalized terms used herein but not defined herein having the meaning stated or described in the BEAD NOFO), that:

1. [Include one of the following clauses, as applicable.]
 - a. The VCBB’s Request for Proposal’s Terms and Conditions for subrecipients in the BEAD Program [specific document reference for Vermont BEAD RFP] has been fulfilled in accordance with the provisions thereof; or
 - b. [Broadband Equity Access and Deployment (BEAD) Program Subrecipient] has provided a replacement letter of credit satisfactory to the FCC.
2. By reason of the event or circumstance described in paragraph (1) of this certificate and effective upon the receipt by the Bank of this certificate (countersigned as set forth below), the Letter of Credit is terminated.

IN WITNESS WHEREOF, the undersigned has executed this certificate as of the ____ day of _____, 20__.

Vermont Community Broadband Board

By: _____

Name:

Title:

By: _____

Name:

Title:

COUNTERSIGNED

National Telecommunications and Information Administration

By: _____

Name:

Its Authorized Signatory