

### 2021-2022 GREAT GRANT FAQs

#### Growing Rural Economies with Access to Technology Grant Program

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This document contains responses to frequently asked questions regarding the 2021-2022 Growing Rural Economies with Access to Technology (GREAT) Grant program funded by the federal American Rescue Plan Act. The NCDIT Broadband Infrastructure Office (the Office) will periodically update this document to include questions from stakeholders or legislative changes that amend the program's governing law.

All stakeholders should review the [2021-2022 GREAT Grant Guidance Document](#).

For overall information about the program, please review the following:

- N.C. Session Law 2021-180 and the corresponding appropriations committee report that established the use of U.S. Department of Treasury Coronavirus State Fiscal Recovery Funds (SFRF) from the American Rescue Plan Act of 2021 for the GREAT Grant Program
- US SFRF Treasury Guidance Final Rule
- US SFRF FAQs
- Compliance and Reporting Guidance
- Compliance requirements of the Uniform Guidance (2 CFR 200)

For general questions about the 2021-2022 GREAT Grant Program or the GREAT Grant Guidance, please email [GREATgrant@nc.gov](mailto:GREATgrant@nc.gov).

1. Funding Source and Funding Availability .....	3
2. Eligible Applicants/Recipients .....	3
3. GREAT Projects and Scoring .....	4
4. Broadband Service/Unserved Areas .....	5
5. Speed Requirements for Deployments .....	7
6. Definition of Infrastructure and Infrastructure Costs .....	8
7. Partnerships.....	8
8. Required Matching Funds and Match Reduction .....	11
9. Awards and Grant Agreements .....	12
10. Eligible Project Areas .....	13
11. Application Materials.....	15
12. Protests of Applications .....	16
13. Other Questions.....	19

## UPDATES AS OF JUNE 15, 2022

### RESPONSES REVISED

- 1.1: Funding Source and Funding Availability (April 13, 2022)
- 13.2: Other Questions (April 13, 2022)

### FAQS ADDED

- 2.2: Eligible Applicants/Recipients (April 13, 2022)
- 3.5: GREAT Projects and Scoring (April 13, 2022)
- 4.5: Broadband Service/Unserved Areas (April 13, 2022)
- 5.2: Speed Requirements for Deployments (April 13, 2022)
- 7.3, 7.4, 7.5, 7.6: Partnerships (April 13, 2022)
- 8.3, 8.4: Required Matching Funds and Match Reduction (April 13, 2022)
- 10.7, 10.8, 10.9, 10.10: Eligible Project Areas (April 13, 2022)
- 13.5, 13.6, 13.7, 13.8: Other Questions (April 13, 2022)
- **12.2, 12.3, 12.4, 12.5, 12.6: Protests of Applications (June 15, 2022)**

## 1. FUNDING SOURCE AND FUNDING AVAILABILITY

### 1.1 We've read that Coronavirus State Fiscal Recovery Fund and the Capital Projects Fund are the sources of funds for this round of GREAT Grants. We have three questions:

- How much in GREAT funds are allotted from each funding source?
- How will awardees know if they are awarded funding from the Coronavirus State Fiscal Recovery Fund or the Capital Projects Fund?
- Are there different federal requirements for each source?

**UPDATE:** On March 17, 2022, Session Law 2022-6 was finalized, creating some technical corrections to the broadband funding appropriated in Session Law 2021-180. The changes allow the N.C. Department of Information Technology (NCDIT) flexibility to transfer funding between the GREAT, Completing Access to Broadband and Stop Gap programs if the total allocations for the programs remain the same.

With this flexibility, NCDIT has determined that State Fiscal Recovery Funds will be utilized to fund the \$350 million of GREAT funding under this funding round. Coronavirus Capital Projects Funds will *not* be utilized to fund this GREAT Grant round. Language in Section A of the GREAT Grant Guidance that refers to Capital Projects Funds may be disregarded. Language specific to Capital Projects Funds in *Appendix B – Summary of Federal of Compliance Requirements*, is also no longer relevant to this funding round.

### 1.2 What is the maximum award amount?

A single grant award shall not exceed \$4 million. No combination of grant awards involving any single county may exceed \$8 million in a fiscal year.

### 1.3 Can an ISP applicant apply for more than one project in a county? And receive more than one award?

Yes; an applicant could apply for more than one project in a county. However, the applications will be reviewed and scored, and will compete against each other as well as against other applications in the state.

It is possible that an internet service provider applicant could receive more than one award in a county subject to the scoring criteria and maximum award amount of \$8 million involving any single county in a fiscal year. The projects will be treated as separate projects with separate grant contract agreements.

## 2. ELIGIBLE APPLICANTS/RECIPIENTS

### 2.1 Is a cellular, mobile provider eligible to apply for the GREAT Grant Program?

Potentially, if the cellular, mobile provider is an eligible recipient and if their proposed broadband service is a terrestrially deployed fixed service as defined in the Guidance Document. A cellular, mobile provider cannot propose an application to use equipment that can be moved from one household to another, such as a cell phone

or hot spot. As stated in the Guidance, applications that do not adequately explain how they can reliably provide the broadband speeds indicated, or do not adequately address scalability of service to 100 Mbps symmetrical by Dec. 31, 2026, may be deemed ineligible for consideration.

## **2.2 Can a local government apply for the GREAT Grant Program?**

No. Please refer to page 5 of the [GREAT Grant Guidance Document](#).

## **3. GREAT PROJECTS AND SCORING**

### **3.1 Where can we review the scoring matrix?**

The scoring criteria for this application round begins on page 26 of the [GREAT Grant Guidance Document](#).

### **3.2 It appears that the cost per household or business language has been updated in N.C.G.S. 143B-1373 (g)(5). We have two questions:**

- **How is cost per household or business calculated?**
- **How will the State compare costs among service provider and verify accuracy?**

It's important to note that the GREAT Act codified in G.S. 143B-1373 was revised in Session Law 2021-180. Section 38.1.(a) of Session Law 2021-180 revises the cost per household or business language in the GREAT Act. Section 38.4.(a) of Session Law 2021-180 replaces G.S. 143B-1373 (g)(5) specifically for the current round of GREAT using the ARPA CSFRF.

Cost per household or business is calculated based on the total project cost to the provider (for eligible costs as defined by the authorizing legislation) in relation to the total number of proposed households or businesses that will be served by the project. See the [GREAT Grant Guidance Document](#) for the definition of Eligible Costs.

The State relies on the applicant to certify that their budget estimates are accurate. In addition, the Office will utilize technology specialists to review proposed technical reports and cost estimates. We also rely heavily on experience with past projects and the costs associated with those projects.

It is also important to keep in mind that this is one criterion in the scoring matrix. If this application received a score that warrants an award, the awardee's budget would become part of the contracting grant agreement. If this project is contracted, the state will hold the grantee accountable by a condition that states that any changes in budget or scope that would affect the original score could be grounds for an increase match requirement or termination of the project.

### **3.3 What is the maximum number of partnership points?**

The maximum number is four points. Please refer to pages 26-27 of the [GREAT Grant Guidance Document](#).

**3.4 It appears that the base speed multiplier language has been updated in N.C.G.S. 143B-1373 (g)(6), how will the multiplier be established if a project provides different minimum and maximum speeds in different areas of a project?**

It's important to note that the GREAT Act codified in G.S. 143B-1373 was revised in Session Law 2021-180. Section 38.1.(a) of Session Law 2021-180 revises the cost per household or business language in the GREAT Act. Section 38.4.(a) of Session Law 2021-180 replaces G.S. 143B-1373 (g)(6) specifically for the current round of GREAT using the ARPA CSFRF.

The base speed multiplier will "provide minimum download and upload speeds." The Office will require that the base speed multiplier chosen by the applicant must be the speed provided to all proposed locations in the application and must be scalable to 100 Mbps symmetrical by Dec. 31, 2026. To qualify for the multiplier, the minimum speed required throughout the project area is 100 download: 20 upload Mbps.

If the available speed differs throughout a proposed project area, the applicant must explain the reason and the Office will apply the multiplier to the lowest level of service available. The applicant will be required to provide a minimum of 100:20 Mbps and scalable to 100 Mbps symmetrical by Dec. 31, 2026.

**3.5 The scoring section of the GREAT Guidance states the following: As a means of breaking a tie for applications receiving the same score, the Broadband Infrastructure Office shall give priority to the application proposing to serve the highest number of new households at the lowest cost per household or business. Which item will take priority, the highest number of new households or the lowest cost per location?**

This tie-breaker language comes directly from the GREAT Grant legislation. However, the Office recognizes that the two criteria included may conflict with each other – one application may have the highest number of new households and another the lowest cost per location. Both criteria are considered in the original scoring for the application and are therefore already considered in the final score. Section 37.1.(a) of the N.C. Session Law 2018-5 created the GREAT Program, and it states the "purpose of this program is to encourage the deployment of broadband at the highest possible speeds throughout as much of the inhabitable geographic area of the State that is practical and feasible by the year 2030." Due to the significant funding appropriated in this ARPA-funded GREAT Grant round and additional complimentary broadband infrastructure grant programs appropriated through ARPA, the Office interprets that the underlying goal of this program is to ensure that North Carolina's unserved households can be served with broadband. To meet that purpose, the Office will consider the highest number of households as the overarching criteria in the case of tie-breakers.

## 4. BROADBAND SERVICE/UNSERVED AREAS

**4.1 If someone has 25 Mbps download and 3 Mbps upload speeds, are they now considered underserved? Is that area eligible for the program?**

The program's authorizing legislation defines an unserved area.

Unserved Area: A designated geographic area that is presently without access to broadband service, meaning terrestrially deployed Internet access service that delivers transmission speeds of at least 25 Mbps download and at least 3 Mbps upload, offered by a wireline or fixed wireless provider. Areas where a private provider has been designated to receive funds through other State or federally funded programs designed specifically for broadband deployment shall be considered served if such funding is intended to result in construction of broadband in the area within 18 months or for the duration of the federal funding program for that area, or if the funding recipient is otherwise in good standing with the funding agency's regulations governing the funding program.

The focus of GREAT is unserved. The CAB and Stop Gap programs include the term underserved. See pages 12-16 of the [GREAT Grant Guidance Document](#) for more information on planning your project area.

#### **4.2 What is the State's definition of Broadband Service?**

Broadband Service: For the purposes of the GREAT Grant program, terrestrially deployed Internet access service with transmission speeds of at least 25 Mbps download and at least 3 Mbps upload (25:3). Terrestrially deployed technologies are generally understood to include wired infrastructure (such as fiber, coax, copper) and fixed wireless.

The definition was revised in Section 3.14.(a) of Session Law 2020-97 codified in N.C.G.S. 143B-1373.

#### **4.3 Is Cellular Mobile Broadband considered terrestrial service?**

Cellular Mobile Broadband service may be considered terrestrial, but broadband service under the GREAT Grant program must be a fixed service. Since the inception of the GREAT Grant program, the Office has defined these terrestrially deployed technologies under the program as wired infrastructure (such as fiber, coax or copper) or fixed wireless.

#### **4.4 Can service providers offer broadband service with monthly data caps of any type?**

The program does not prohibit a broadband service provider from implementing a monthly data cap; however, page 23 of the [GREAT Grant Guidance Document](#) requires a description of services to be provided, including the proposed upstream and downstream broadband speeds to be delivered and any applicable data caps. Any applicant proposing a data cap below 150 Gigabytes of usage per month shall provide justification to the Office's satisfaction that the proposed cap is in the public interest and consistent with industry standards.

#### **4.5 In the scoring matrix, specifically for the criterion for the Unserved Households (HH) To Be Served pages 27-28 of the Guidance Document, how do you calculate the percentage of Unserved HHH to be served?**

- **Can an applicant use their own data to calculate the percentage?**

The scoring matrix includes points for both of the following criteria:

- Unserved Households per County (the estimated total number of unserved households within the county)
- Percentage of Unserved Households to be Served (within the county, based on the proposed project)

The Office estimates the number of unserved households, and percent unserved within the county, based on the latest available FCC Form 477 data and the 2010 census data. These numbers are reflected in Appendix E of the [GREAT Grant Guidance Document](#).

The Office recognizes that these numbers are understated due to the lack of granularity within the FCC data; however, these numbers are utilized for the scoring criteria to provide a consistent, standardized method to look at unserved levels across the state. It is understood that the actual number of unserved households in each county is higher than what is represented in Appendix E, but for the purposes of scoring, the data in the table is utilized to provide a consistent data set across all counties. The Office will not add in other data sets unless that data were available statewide.

## 5. SPEED REQUIREMENTS FOR DEPLOYMENTS

### 5.1 What are the speed requirements for this application round?

Please refer to page 7 of the [GREAT Grant Guidance Document](#).

### 5.2 In applying the base speed multiplier to a proposed grant project, is the scoring recognizing the base service *capable of being offered*, or the base service that is *actually offered*?

The base speed multiplier is based on the speeds that will be *available within the project area to all proposed broadband recipients* as a result of the grant deployment.

- If locations in a project area will all have 100:20 to < 100:100 Mbps available to them, then the multiplier is 1.
- If locations in a project area will all have 100 Mbps symmetrical available to them, then the multiplier will be 2.
- If locations in a project area will all have greater than 100 Mbps symmetrical available to them, then the multiplier will be 3.

Broadband access is considered available if the internet carrier can provide broadband service to a location immediately or within ten (10) business days upon request and without cost to the customer other than standard connection fees. Some locations within a project area could have higher speeds available, but the base speed is whatever the download/upload speed combination is that will be available to all locations within the build. These speeds should represent the *planned typical speeds* that will be able to be provided, not the advertised speeds. Since the program is designed as a broadband deployment and access program, the ISP grantee may offer a range of consumer service plans and pricing tiers, with

speeds differing from the base speed, as long as the base speed is *available* to that consumer. The base speed multiplier is not setting the required minimum speeds that must be offered in a project area.

## 6. DEFINITION OF INFRASTRUCTURE AND INFRASTRUCTURE COSTS

### 6.1 What is the definition of costs in G.S. 143B-1373.1(d)?

Please see page 7 of the [GREAT Grant Guidance Document](#).

### 6.2 Does the program allow costs to connect to each household (e.g., the drop and connection to the house) or just the cost to pass each household?

The legislation refers to “projects that will provide broadband service” to unserved households and businesses. The number of unserved households and businesses “to be served” must be included in the application. The Office interprets the program to mean that infrastructure deployments should utilize a “homes-passed” approach in calculating the number of unserved households and businesses reached.

Page 32 of the [GREAT Grant Guidance Document](#) defines broadband access as “considered available if the internet carrier can provide broadband service to a Location immediately or within 10 business days upon request and without cost to the customer other than standard connection fees.” Drops, optical network terminals or other customer premise equipment should then be able to be easily installed following sign-up by a customer.

Whether an applicant chooses to include costs for drops, optical network terminals or other customer premise equipment in the application is up to the applicant. Grant funding could be reduced if the funding cannot be spent as outlined in the project application, although a process for budget revisions will also be included in award contracts. Estimating costs based on the adoption rate is up to the applicant to determine and to inform the Office of their methodology of calculating this cost. It is important to note that the Office will question an application that claims 100% adoption rate.

## 7. PARTNERSHIPS

### 7.1 We are a county government that has issued an RFP for the deployment of broadband infrastructure using our ARPA funds received from the U.S. Treasury. Are we prohibited from partnering with an ISP interested in applying for this round of GREAT Grants?

It depends. Section 38.4.(a) of N.C. Session Law 2021-180 in subsection (1) defines an “Eligible economically distressed area” as “a county designated as a development tier one or tier two area, as defined in G.S. 143B-437.08, or a rural census tract, as defined in G.S. 143B-472.127(a)(2), located in any other county. For the purposes of this subdivision, the tier designation that is in effect as of the beginning of a fiscal year shall be applied for all grants awarded for that fiscal year. With the exception of funds expended under this section or under G.S. 143B-1373.1, as enacted by Section 38.6(a) of this act, a county that has utilized federal funding for broadband

infrastructure on or after May 1, 2021, shall be ineligible.”

Based on the legislation, if a county has entered into a contract or encumbered their ARPA dollars for a broadband infrastructure deployment project on or after May 1, 2021, that county becomes ineligible for a potential GREAT Grant project.

**7.2 The GREAT Grant Guidance that was published on Jan. 31, 2022, appears to have conflicting information as it relates to N.C.G.S. 153A-459 and the Partnership language in Section 38.1.(a) of Session Law 2021-180. Does a County have authorization to provide a financial contribution in the current round of GREAT Grants that began Jan. 31, 2022?**

Yes, a county does have authorization to provide a financial contribution in partnership with an eligible applicant for the current GREAT Grant round.

Section 38.1.(a) of Session Law 2021-180 pertains to the GREAT Grant program that is appropriated from the State through the State Capital Infrastructure Fund.

The [GREAT Grant Guidance Document](#) that was released on Jan. 31, 2022, is authorized in Section 38.4.(a) of Session Law 2021-180. This allows NCDIT to use the ARPA State Fiscal Recovery Funds (SFRF). For this current GREAT Grant application round using SFRF, Subsection 8 of Section 38.4.(a) replaces the G.S. 143B-1373(g)(1).

It is also important to note that N.C.G.S. 153A-459 was rewritten in Section 38.10.(a) of Session Law 2021-180.

**7.3 Is the Office or NCDIT a party to the partnership agreement between an applying ISP and their partner, such as a county, in the GREAT Grant Program?**

No. The Broadband Infrastructure Office is not a party to an agreement between the applying ISP and their partner in the GREAT Grant Program. The Office will only evaluate if the partnership and its agreement satisfies the requirement to earn points as defined in the Guidance Document. As a reminder, for partnerships providing matching funds, Eligible Project Costs for matching funds are the same as Eligible Projects Costs for the GREAT grant funds. Grant and match funds can only support project costs in the eligible project area.

**7.4 Does the Office have a sample partnership agreement for use by a county?**

No, the Office does not have a standardized, sample agreement. Section 38.4(a) of Session Law 2021-180, subsection 8 states: “Projects proposing a partnership shall be given points in their application score. A proposed partnership shall (i) be in writing, (ii) provide the specific terms and conditions of the partnership, and (iii) be signed and attested to by the parties.

The Office suggests that counties consider addressing the following items within any partnership agreements:

1. Develop an agreement in writing.

2. (If applicable) Identify or specify the following: Existing infrastructure or County-owned property, buildings, or structures for the facilitation of the Applicant's proposed broadband service. Provide description of how the existing infrastructure or structures will facilitate the proposed broadband service.
3. (If applicable) If a county is a proposed partner, identify or specify the dollar amount of the unrestricted general funds or ARPA funds received directly from U.S. Treasury or a combination of both.
4. Affirmation that the financial match will be used for eligible costs, activities, and will follow the same schedule as defined in the GREAT Grant Program.
5. Affirmation that the funds will be used toward assisting the application with a portion of their match not to exceed 50% of the applicant's required match.
6. Affirmation that the partners agree to comply with all Federal, State, and local laws, rules, regulations, and ordinances applicable to the project.
7. If the agreement is contingent upon the award of a GREAT Grant Project, the Partner and Applicant, will agree to fully execute and submit the finalized contract document to the Office following of notice of award.
8. Affirmation by both parties that includes the following:
  - Understands that the partnership agreement is a part of the legislatively authorized scoring criteria and points earned in these criteria determines the amount of the match and whether an ISP applicant receives an award.
  - Recognition that if the partnership fails to materialize or the executed contract document is not submitted to the Office following the notice of award or if partner's funds are not available after contracting with NCDIT then NCDIT may rescind the award or require a higher match amount for the ISP applicant.
  - Recognition that if NCDIT rescinds the award to the applicant, NCDIT has the right to declare the areas eligible for a future round of the GREAT Grant or the Completing Access to Broadband Program.
9. (If applicable) An affirmation that a county may enter into proposed partnerships with more than one GREAT Grant Program applicant.
10. (If applicable) Affirmation that a county understands that entering into a partnership does not authorize a county to provide broadband service.

**7.5 What if the partnership agreement is a tentative agreement pending award of any GREAT grants? Is that ok?**

Yes. The GREAT Grant legislation includes the following language: For projects where the application includes a proposed partnership, the grant agreement contract with the State will contain a provision requiring a certification of the existence of the partnership prior to disbursement of grant funds. The Office will require a copy of the final partnership agreement prior to contracting of the GREAT Grant Agreement with the grantee. Failure to produce a finalized, partnership agreement accepted by the Office will result in rescoring of the application, adjustment of the match requirement and potential loss of the award based on any new scores resulting from these

adjustments.

**7.6 What does it mean for the agreement to be “attested by both parties”? Will you require that the agreement be notarized?**

Partnership agreements must be signed by both parties. For proposed partnership agreements submitted for the application deadline, the partnership documentation can be signed by the partner as part of the application, with the full application signed and submitted by the applicant. Final agreements will be required for contracting of GREAT Grant Agreements and will need signatures from both authorized parties. The Office does not require notarized copies.

## 8. REQUIRED MATCHING FUNDS AND MATCH REDUCTION

**8.1 What are the Match Requirements for the Program?**

Please refer to pages 9 and 22-23 of the [GREAT Grant Guidance Document](#).

**8.2 As an applicant, we have the following scenario: If we submit an application with a total project cost of \$5 million, and upon scoring our application it is determined that our score is over 22 points, our required match would be 30% of the total project, or \$1.5 million. If we partner with a county that agrees to fund a portion of the match with either their funds partially comprised of ARPA funds or totally comprised of ARPA funds, our required match may be lowered to either 25% or 15%, respectively.**

- Does this mean, that if the county participates with partial ARPA funds, our match would be lowered from 30% to 25% (\$1.25 million) and the county’s match amount would be 5% (\$250,000) of the total project?
- If the county’s financial participation consists entirely of ARPA funds, does that mean our match requirement drops from 30% to 15% (\$750,000) and the county match is also 15% as the same \$750,000 amount?

Please refer to pages 9 & 22-23 of the [GREAT Grant Guidance Document](#). “Up to 50% of matching funds paid by the grant recipient may be comprised of third-party funding, including funds from other grant programs or federal funds to the extent applicable rules permit.”

Using the scenario above:

- If the applicant’s score warrants a 30% match at \$1,800,000, then up to 50% (or \$900,000) can be comprised of third-party funding.
- If a county participates with partial ARPA funds, then the applicant’s match may be reduced to 25% (or \$1.25 million) regardless of score. The County may choose to fund up to 50% (or \$625,000) of the required 25% match. The State would make an award of \$3.75 million.
- If a county’s financial participation consists entirely of ARPA funds, then the applicant’s match may be reduced to 15% (or \$750,000) regardless of score. The County may choose to fund up to 50% (or \$375,000) of the 15% match. The State could make a maximum award of \$4 million. The applicant will have to either reduce the scope of work or increase its match contribution to

make up the difference.

**8.3 If an applicant receives a score of 22.5, is the applicant guaranteed to receive a 70% grant match from the state and provide a 30% applicant match? Is there any situation where an applicant could receive over 22.5 points, but only get a 50% match from the State?**

The match requirements in the program are designed to be the calculation of an applicant's match as a percentage of the total project cost which equals the minimum dollar amount that the applicant must commit towards the project. The difference between the total project cost and the applicants minimum match amount is the award amount from the State. A single grant award shall not exceed \$4 million. There could be a situation where the total project cost minus the applicant's minimum match amount exceeds the \$4 million maximum award amount. The difference would have to be covered by the applicant which could result in a higher match than what the applicant may be eligible for based on their score.

**8.4 If a county provides ARPA funding and an applicant receives over 22.5 points, does that mean an applicant can receive a grant match of 75% and have 25% applicant match?**

- **And if all the funding the county provides is ARPA funding, you receive 85% grant match? Is this guaranteed?**
- **Is there any situation where this wouldn't be the case?**
- **Is there a certain amount of money the county needs to contribute to qualify for this?**

Please refer to page 9 of the Guidance Document for more information regarding the potential of a reduction in match. Please refer to question and answer 8.3 regarding guarantees for match amounts or situations where an applicant may have a greater match than what they may be eligible for based on their score.

There is not a specific amount of money a county must contribute to a project; however, there are specific requirements of how a county can participate in the program. Please refer to the partnership definition and partnership criterion of the scoring matrix in the [GREAT Grant Guidance Document](#). If a county chooses to partner with an ISP applicant by providing a portion of the applicant's match, the county is considered a third-party and can only provide up to 50% of the applicant's required match.

## 9. AWARDS AND GRANT AGREEMENTS

**9.1 On page 10, under "Five-Year Service Agreement", does that mean we have five years to build out the infrastructure; or, does it mean we only have two years to build it out once the agreement is executed?**

This term is understood to mean a five-year grant agreement and consists of a Deployment Project Period ("Construction Period") and Maintenance Period.

Please see the definition of Deployment Period and Maintenance Period on pages

## 10. ELIGIBLE PROJECT AREAS

### 10.1 Why are RDOF wired areas ineligible, but RDOF satellite areas eligible?

Section 38.4.(a) of N.C. Session 2021-180 in subsection (4) defines an unserved area as “A designated geographic area that is presently without access to broadband service, as defined in this section, offered by a wireline or fixed wireless provider. Areas where a private provider has been designated to receive funds through other State- or federally funded programs designed specifically for broadband deployment shall be considered served if such funding is intended to result in construction of broadband in the area within 18 months or for the duration of the federal funding program for that area, or if the funding recipient is otherwise in good standing with the funding agency's regulations governing the funding program.”

RDOF wired areas are ineligible because a wireline provider was awarded these funds and that it is a currently active federal funding program.

RDOF satellite areas are not a wireline or fixed wireless provider.

### 10.2 Are partially served census blocks ineligible?

Unserved locations in partially served census blocks are eligible for this round of GREAT Grants. The Office's goal is to ensure that all locations without access to 25:3 Mbps become served through these ARPA dollars. We encourage ISP applicants that have available data on unserved locations within partially served census blocks to include these areas in their applications. Please refer to pages 12-16 of the [GREAT Grant Guidance Document](#) for more information on planning your project area.

### 10.3 Are Tier 3 counties left out of this round?

No. An eligible, economically distressed area is a county designated as a development tier one or tier two area, as defined in G.S. 143B-437.08, or a rural census tract, as defined in G.S. 143B-472.127(a)(2), located in any other county. For the purposes of this subdivision, the tier designation that is in effect as of the beginning of a fiscal year shall be applied for all grants awarded for that fiscal year.

### 10.4 The N.C. Department of Commerce updates county Tier Rankings every calendar year. What is the year of the Tier Rankings used in the current round of GREAT Grants?

This program's authorizing legislation states that “the tier designation that is in effect as of the beginning of a fiscal year shall be applied for all grants awarded for that fiscal year.” This fiscal year began on July 1, 2021. This program is using the [N.C. Department of Commerce's 2021 Tier designations](#).

### 10.5 What is the definition of a rural census tract?

For the purposes of this application round, a rural census tract is defined in G.S. 143B-472.127(a)(2). This states, “the term ‘rural census tract’ means a census tract

having a population density of less than 500 people per square mile according to the most recent decennial federal census.”

**10.6 If an RDOF area has not been authorized, would that make those areas eligible for this application round?**

As of the date of this FAQ document, all Rural Digital Opportunity Fund (RDOF) areas that were identified by the FCC in the initial awards and that have not been withdrawn, regardless of whether the long form has been submitted and approved, are considered ineligible for this GREAT Grant funding round. The Office will continue to monitor the status of these FCC awards as they may impact future GREAT Grant rounds.

**10.7 For the “10% allowance” within grants for eligible addresses, can that 10% of addresses fall within a “protected area” (e.g., having up to 10% of the addresses fall in an RDOF or Non-Rural Tract area)? Or do all the addresses in our application have to fall outside “protected areas”, and the 10% allowance only applies to unprotected areas with greater than 25:3 speeds?**

All locations submitted within a GREAT project, to be served by that project, must fall outside of “Protected Areas”. All “Protected Areas” are ineligible for this current round of the GREAT Program. Please refer to pages 11-16 of the [GREAT Grant Guidance Document](#).

**10.8 We’ve been reviewing the baseline map provided on NC OneMap and are the areas that are identified as “Census Block with NC Broadband Surveys reporting less than 25:3 service (Indicated Fastest Available)” eligible for the program?**

This layer highlights partially served census blocks and is intended to show where the Office has received speed test data from survey respondents showing service of less than 25:3 Mbps, and who also indicate that this service is the fastest available to them at this location. The layer does not consider other offerings in the area. Although, a survey respondent’s location may be eligible for the program, this does not mean that the entire census block is unserved.

It is still the applicant’s responsibility to fully identify that their proposed project area is unserved. We encourage ISP applicants that have available data on unserved locations within partially served census blocks to include these areas in their applications. Please refer to pages 12-16 of the GREAT Grant Guidance Document for more information on planning your project area.

**10.9 Have any changes been made to the GREAT Grant Mapping Tool since it was initially published for this round?**

Yes. As referenced on page 14 of the [GREAT Grant Guidance Document](#) in relation to the GREAT Grant Online Mapping Tool, “additional detail on methodologies can be found in the mapping tool itself. Note that some datasets within the mapping tool may receive periodic updates. An explanation of any updates will be included in the methodology.” The GREAT Grant Online Mapping Tool Help Document (accessible from a link within the mapping tool) explains the methodologies behind the data

layers and also details specific updates that have been made to the map.

Access the GREAT Grant Online Mapping Tool and Help Document at <https://nconemap.maps.arcgis.com/apps/webappviewer/index.html?id=72f01e944bde425ca07523d06a59c232>.

#### **10.10 Why are census blocks with VDSL and VDSL2 service included in maps from the Broadband Infrastructure Office showing service of less than 25 Mbps download:3 Mbps upload available?**

As outlined in the GREAT Grant Online Mapping Tool Help Document – the layer “FCC Less Than 25 mb/s Download and 3 mb/s Upload” *summarizes FCC reported Broadband Service per census block using the available technologies deployed in each block to determine speeds and a count of the number of providers in each block. Blocks are then categorized into speed tiers based on the technical capabilities of each technology. In blocks that have multiple technologies available, the technology with the highest download and upload speed capabilities is listed as the technology and speed tier.*

The GREAT Grant Guidance document includes the following language:  
Broadband Service: For the purposes of the GREAT Grant Program, terrestrially deployed Internet access service that delivers transmission speeds of at least 25 Mbps download and at least 3 Mbps upload (25:3). Terrestrially deployed technologies are generally understood to include wired infrastructure (such as fiber, coax, copper) and fixed wireless. In assessing the delivery of transmission speeds for purposes of defining unserved areas, the federal definition of “reliably,” within the American Rescue Plan Act’s broadband funding rules, should also be considered. Areas where broadband transmission speeds are not delivered reliably may be considered unserved.

The Office recognizes that some VDSL technologies can provide speeds much greater than 25:3 Mbps, at locations near the DSL cabinets. However, distance limitations are ubiquitous within DSL technologies. In addition, limitations in total numbers of customers that may be served from this equipment may exist. The Protest Process under the GREAT Grant legislation provides opportunity for a VDSL provider within the census block, to submit a protest to new proposals indicating specific locations that are reliably served.

## **11. APPLICATION MATERIALS**

### **11.1 How do I access the application?**

Please visit <https://www.ncbroadband.gov/grants/great-grant-federal/great-grant-2021-2022> to access the application and instructions.

## 12. PROTESTS OF APPLICATIONS

### 12.1 It appears that the protest language has been updated in N.C.G.S. 143B-1373 (e), and we have 2 questions:

- Does this mean that a fixed wireless provider that offers >25:3 Mbps download/upload speeds can protest any fixed wired GREAT Grant application if they can credibly claim to offer service to >10% of the homes?
- Does the challenging provider have to have any actual customers or does the challenge only need to make a bona fide offer of service at the time of the challenge?

It's important to note that the GREAT Act codified in G.S. 143B-1373 was revised in N.C. Session Law 2021-180. Section 38.1.(a) of N.C. Session Law 2021-180 revises the protest language in the GREAT Act. Section 38.4.(a) of N.C. Session Law 2021-180 replaces G.S. 143B-1373 (e) specifically for the current round of GREAT Grants using the ARPA CSFRF.

An excerpt of this referenced section is as follows: "A broadband service provider currently providing broadband service in a project area proposed in an application may submit a protest of any application on the grounds the proposed project covers an area that is a protected area under subsection (c) of this section or that the proposed project area contains ten percent (10%) or more of total households with access to broadband service as defined in this section. Protests shall be submitted in writing, accompanied by all credible and relevant supporting documentation, including specific addresses, and detailed mapping demonstrating that the protesting broadband provider has installed infrastructure sufficient to provide broadband service to the specific addresses provided in the protest, along with an attestation that broadband service is available to the exterior of the structure at the specific addresses indicated."

Any provider that is currently providing broadband service in a project area in a proposed application can submit a protest. The protesting provider can only protest for two reasons:

- The proposed application covers a protected area as defined in the program, or
- The proposed project area contains ten percent (10%) or more of total households with access to broadband service.

The protesting provider must provide "all credible and relevant supporting documentation, including specific addresses, and detailed mapping demonstrating that the protesting broadband provider has installed infrastructure sufficient to provide broadband service to the specific addresses provided in the protest, along with an attestation that broadband service is available to the exterior of the structure at the specific addresses indicated." In addition, as referenced in the Guidance, in assessing the delivery of transmission speeds for purposes of defining unserved areas, the federal concept of "reliably", within the American Rescue Plan Act provisions related to broadband funding, should also be considered. Areas where broadband transmission speeds are not delivered reliably, may be considered unserved.

Please review pages 12-16 of the [GREAT Grant Guidance Document](#) for more information regarding planning for your project area.

**12.2 A broadband service provider currently providing broadband service in a project area proposed in an application may submit a protest of any application on the grounds the proposed project area contains ten percent (10%) or more of total households with access to broadband service.**

- **What constitutes the numerator and denominator that generates this percentage?**
- **Does this mean the number of households in the project area that our company can serve?**
- **Does this mean the number of households with access based on Form 477 data?**
- **What if ten percent or more of the households that lie within our service area have access? Does this mean that a fixed wireless provider that offers >25:3 Mbps download/upload speeds can protest any fixed wired GREAT Grant application if they can credibly claim to offer service to >10% of the homes?**

The Broadband Infrastructure Office will consider a protest if the broadband service provider submitting the protest:

- (1) provides service in the application project area, and
- (2) serves 10% or more of the households in a proposed GREAT grant project.

This 10% threshold should be calculated as follows:

- The total number of households proposed to be served as part of the GREAT Grant project (which can be found on the application form).
- Multiplied by 10%
- This answer represents the protest threshold. For example, a GREAT project of 300 households, the protest threshold would be 30 households.

**12.3 The GREAT program guide includes language specifying that the protest include “detailed mapping demonstrating that the protesting broadband provider has installed infrastructure sufficient to provide broadband service to the specific addresses provided in the protest” but this requirement is NOT included in the [online protest instructions](#), which only specifies: If protesting based on the criteria that 10% or more of households within the project area are served, please indicate this reason and include the following:**

- **The exact locations where broadband service is currently available from the protesting provider (with locations submitted per the data submission requirements in the GREAT Grant Guidance Document).**
- **A statement to confirm that the protesting provider currently has service available to these locations, that meets the requirements outlined in the GREAT Grant Guidance Document.**

**Can you clarify if detailed mapping of installed infrastructure is still required for protests based on 10% or more of households having access to broadband service?**

The [GREAT Grant Guidance Document](#) indicates under Data Submission Requirements on page 25 that all protests must be submitted utilizing the AddressNC data set with address-level data (or parcel-level if address-level data is not available). Based on this process, additional mapping documentation is not required with the submission.

The GREAT program guide includes the following language:

Protests shall be submitted in writing, accompanied by all credible and relevant supporting documentation, including specific addresses, and detailed mapping demonstrating that the protesting broadband provider has installed infrastructure sufficient to provide broadband service to the specific addresses provided in the protest, along with an attestation that broadband service is available *to the exterior of the structure* at the specific addresses indicated.

- **Can you provide additional guidance by what the phrase “to the exterior of the structure” means? Would this require drop wire/network interface to already be installed, or is it sufficient that service can be provisioned within a short timeframe (may be 10 days?) upon receipt of a request for service?**

The GREAT Guidance definition of “broadband access” specifies that “Broadband access is considered available if the internet carrier can provide broadband service to a Location immediately or within 10 business days upon request and without cost to the customer other than standard connection fees.”

- 12.5 We’re diving into the challenge process (and looking to submit quite a few, as a heads up for you and your team), and I have a question for you. I understand the rule whereby the only criteria by which an application may be challenged is where a proposed project area contains ten percent or more total households with access to broadband service. What we’re running into in a few scenarios is that the total project area doesn’t contain ten percent of households with access to broadband service, but ten percent or much more of the households that lie within our service area for a project do have access to our broadband service. Can we challenge those projects?**

Please see answer in 12.2

- 12.6 We have a parent and subsidiary company. Both entities are registered to do business in NC with the NC Department of the Secretary of State. Can the parent and subsidiary submit a protest?**

An eligible provider's parent or subsidiary company may submit a protest.

**12.7 Is there any particular form required for the “attestation” of a grant application protest?**

There is not a form. Please submit all protests submitted via email to [GREATProtest@nc.gov](mailto:GREATProtest@nc.gov) with the items outlined at <https://www.ncbroadband.gov/grants/great-grant-federal/great-grant-2021-2022/2022-great-grant-protest-process> and in the [GREAT Grant Guidance Document](#). As the Office works through the protests received, the Office reserves the right to request additional information or signature on information submitted.

## 13. OTHER QUESTIONS

**13.1 I see differences in the GREAT legislation from what is presented in the Guidance document. Why is this the case?**

The GREAT Grant program is a competitive grant codified in N.C.G.S. § 143B-1373, established under S.L. 2018-5, and amended by S.L. 2019-230, S.L. 2020-97, and S.L. 2021-180. It is important to note that S.L. 2021-180, in Section 38.1 (DIT/GREAT Act Changes), amends the underlying GREAT Grant program (including any future funding rounds utilizing State dollars). Section 38.4 (State Recovery Funds/Broadband Grants) then amends these underlying program requirements with legislation specific to the ARPA-funded GREAT Grant program. These Sections must be interpreted together to understand the requirements under this 2021-2022 GREAT Grant funding round.

**13.2 If our county participates in the GREAT Grant program, will we also be able to participate in the CAB Program?**

S.L. 2021-180 outlines parameters for the new Completing Access to Broadband (CAB) Program in Section 38.6. Within this legislation, the definition of Eligible Area under Section 38.6.(a)(3) is:

Eligible Area: An area that is unserved or underserved in a county. A county that has utilized federal funding for broadband infrastructure projects on or after May 1, 2021, is not eligible.

Counties may serve as partners in the GREAT Grant program and also participate in the CAB program. Counties may not participate in either program if they have spent federal dollars outside these two programs since May 1, 2021.

**Update:** On March 17, 2022, Session Law 2022-6 was finalized, creating some technical corrections to the broadband funding appropriated in Session Law 2021-180. Within these changes, Section 38.6 of S.L. 2021-180 is rewritten as follows:

“Eligible area. – An area that is unserved or underserved in a county. With the exception of funds expended under this section, or under Section 38.4 or Section 38.5 of S.L. 2021-180, a county that has utilized federal funding for broadband infrastructure projects on or after May 1, 2021, is not eligible.”

This language clarifies that counties may use federal funding and participate in all

three programs (GREAT, CAB and Stop Gap).

**13.3 Will these FAQs be updated?**

This FAQ document will be updated as we continue to receive questions that warrant clarifications on the [GREAT Grant Guidance Document](#). Updates will be denoted with the change date. This FAQ document lives on the [GREAT Grant 2021-2022 webpage](#). Please frequently check this page for updates.

**13.4 Will you be updating the maps/data within the GREAT Grant Mapping Tool?**

Yes. Some datasets within the mapping tool may receive periodic updates. An explanation of any updates will be included in the methodology found on pages 14-16 of the [GREAT Grant Guidance Document](#). See additional information in FAQ 10.9.

**13.5 Who is considered an authorized representative for the applicant?**

The authorized representative must be the person who has the authority to submit the application on behalf of the company and/or can enter a legally binding contract.

If the person who has authority to submit an application is different from the person who can enter into a legally binding contract, the applicant is required to provide the name and title of the person who will be responsible for signing and entering into a grant agreement, if awarded funds.

**13.6 What will the Office do if there are multiple applications in a county and some of the proposed areas overlap in each application?**

The Office will prioritize the highest scoring applications in each county. In the event there are multiple applications in one county, the highest scoring application will have priority for an award in each eligible county.

If the remaining applications have any overlap or similar proposed service areas as the highest scoring applications, applications must be revised to remove the overlapping areas and adjust the proposed project budget. The Office will be required to re-score the project due to the amended scope and budget.

If there are funds available, then the Office will award the remaining applications by prioritizing the highest scoring applications subject to the parameters of the program such as no combination of grant awards involving any single county may exceed \$8 million in a fiscal year.

**13.7 Can a county use their Local Fiscal Recovery Funds to provide match for current GREAT Grant projects that were funded with State funding in 18-19, 19-20 or the Special Supplementary round?**

No. Although the State-funded GREAT Grant projects are current broadband deployments happening in the state, the matching funding for those projects had to be identified and secured upon applying for and contracting of those projects.

**13.8 Can a proposed partnership agreement with a county government suffice as evidence of support for the project from citizens, local governments, businesses, and institutions within the community?**

Yes. The requirement for the evidence of support is meant to show support from the community. A proposed partnership agreement shows a commitment from a local institution that is willing to provide infrastructure for the deployment of broadband or a financial commitment. It is still encouraged for the applicant to include letters of support from other relevant parties.

All letters of support should be submitted with the application and not sent to the Broadband Infrastructure Office.