

STATE OF NORTH CAROLINA

BROADBAND EQUITY, ACCESS, AND DEPLOYMENT (BEAD) PROGRAM FINAL PROPOSAL

DRAFT AUGUST 2025

In compliance with the BEAD Notice of Funding Opportunity, as modified by the National Telecommunications and Information Administration's BEAD Restructuring Policy Notice

Contents

| | | |
|-----|---|----|
| 0. | Final Proposal Data Submission | 6 |
| 0.1 | Attachment (Required): Complete and submit the Subgrantees CSV file (named “fp_subgrantees.csv”) using the NTIA template provided. | 6 |
| 0.2 | Attachment (Required): Complete and submit the Deployment Projects CSV file (named “fp_deployment_projects.csv”) using the NTIA template provided. | 6 |
| 0.3 | Attachment (Required): Complete and submit the Locations CSV file (named “fp_locations.csv”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations. | 6 |
| 0.4 | Attachment (Required): Complete and submit the No BEAD Locations CSV file (named “fp_no_BEAD_locations.csv”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations. | 6 |
| 0.5 | Question (Y/N): If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)? | 6 |
| 0.6 | Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named “fp_cai.csv”) using the NTIA template provided. | 6 |
| 1. | Subgrantee Selection Process Outcomes (Requirement 1) | 7 |
| 1.1 | Text Box: Describe how the Eligible Entity’s deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice. | 7 |
| 1.2 | Text Box: Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers. | 10 |
| 1.3 | Text Box: Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal. | 10 |
| 1.4 | Text Box: If applicable, describe the Eligible Entity’s methodology for revising its eligible CAI list to confirm with Section 4 of the BEAD Restructuring Policy Notice. | 11 |
| 1.5 | Question (Y/N): Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant’s final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process. | 11 |
| 2. | Intentionally Omitted | 12 |
| 3. | Timeline for Implementation (Requirement 3)..... | 13 |
| 3.1 | Text Box: Has the Eligible Entity taken measures to:..... | 13 |
| 4. | Oversight and Accountability Processes (Requirement 4)..... | 14 |
| 4.1 | Question (Y/N): Does the Eligible Entity have a public waste, fraud, and abuse hotline and a plan to publicize the contact information for this hotline?..... | 14 |
| 4.2 | Attachments (Required): Upload the following two required documents:..... | 14 |

| | |
|---|-----------|
| 4.2(1) BEAD Program Monitoring Plan | 14 |
| 4.2(2) Agency policy documentation which includes the following practices: | 14 |
| <i>a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and</i> | <i>14</i> |
| <i>b. Timely subgrantee (to Eligible Entity) reporting mandates.....</i> | <i>14</i> |
| 4.3 Question (Y/N): Certify that the subgrant agreements will include, at a minimum, the following conditions: | 15 |
| 5. Local Coordination (Requirement 5) | 16 |
| 5.1 Text Box: Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed the comments. | 16 |
| 6. Challenge Process Results (Requirement 6) | 17 |
| 6.1 Question (Y/N): Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA..... | 17 |
| 6.2 Text Box: Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted. | 17 |
| 7. Unserved and Underserved Locations (Requirement 7)..... | 19 |
| Coverage of Unserved Locations..... | 19 |
| 7.1 Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2). | 19 |
| 7.2 Text Box: If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination. | 19 |
| 7.3 Attachment (Optional): If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination. | 19 |
| Coverage of Underserved Locations | 19 |
| 7.4 Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2). | 19 |
| 7.5 Text Box: If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination. | 19 |
| 7.6 Attachment (Optional): If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination. | 19 |
| 7.7 Question (Y/N): Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the | |

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| Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the <i>fp_no_BEAD_locations.csv</i> file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved. | 20 |
| 7.8 Intentionally omitted | 20 |
| 7.9 Intentionally omitted | 20 |
| 7.10 Question (Y/N): Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects. | 20 |
| 8. Intentionally Omitted | 21 |
| 9. Intentionally Omitted | 22 |
| 10. Intentionally Omitted | 23 |
| 11. Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience (Requirement 11) | 24 |
| 11.1 Text Box: Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment. | 24 |
| 11.2 Question (Y/N): Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws. | 24 |
| 11.3 Text Box (Optional - Conditional on a 'No' Response to Intake Question 11.2): If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so. | 24 |
| 11.4 Question (Y/N): Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period. | 25 |
| 11.5 Text Box (Optional - Conditional on a 'No' Response to Intake Question 11.4): If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period, explain why the Eligible Entity was unable to do so. | 25 |
| 11.6 Question (Y/N): Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks. | 25 |
| 11.7 Text Box (Optional - Conditional on a 'No' Response to Intake Question 11.6): If the Eligible Entity does not certify that subgrantees have planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so. | 25 |
| 12. Substantiation of Priority Broadband Projects (Requirement 12) | 26 |
| 12.1 Text Box: Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice. | 26 |

| | | |
|------|--|----|
| 13. | Subgrantee Selection Certification (Requirement 13)..... | 32 |
| 13.1 | Text Box: Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice’s scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice. | 32 |
| 14. | Environmental and Historic Preservation (EHP) Documentation (Requirement 14) | 34 |
| 14.1 | Attachment (Required): Submit a document which includes the following:..... | 34 |
| 15. | Consent from Tribal Entities (Requirement 15)..... | 34 |
| 15.1 | Attachment(s) (Required if any deployment project is on Tribal Lands): Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. | 35 |
| 16. | Prohibition on Excluding Provider Types (Requirement 16)..... | 36 |
| 16.1 | Question (Y/N): Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)? | 36 |
| 17. | Waivers | 37 |
| 17.1 | Text Box: If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note ‘Not applicable.’ | 37 |
| 17.2 | Attachment (Optional): If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again. | 37 |

0. Final Proposal Data Submission

- 0.1 Attachment (Required):** Complete and submit the Subgrantees CSV file (named “fp_subgrantees.csv”) using the NTIA template provided.

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (fp_subgrantees_NC_draft).

- 0.2 Attachment (Required):** Complete and submit the Deployment Projects CSV file (named “fp_deployment_projects.csv”) using the NTIA template provided.

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (fp_deployment_projects_NC_draft).

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

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (fp_locations_NC_draft).

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

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (fp_no_BEAD_locations_NC_draft).

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

Yes.

- 0.6 Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question 0.5):** Complete and submit the CAIs CSV file (named “fp_cai.csv”) using the NTIA template provided.

Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity’s Challenge Process results.

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (fp_cai_NC_draft).

1. Subgrantee Selection Process Outcomes (Requirement 1)

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

If the Eligible Entity has completed or is in the process of completing its Subgrantee Selection Process at the time of the release of the BEAD Restructuring Policy Notice, the Eligible Entity must use this section to describe how it conducted at least one additional "Benefit of the Bargain Round" for every BEAD-eligible location. The Eligible Entity must detail how it conducted the "Benefit of the Bargain" round, including how it addressed prequalification (if applicable) and resubmission of applications.

The N.C. Department of Information Technology (NCDIT) is the designated Eligible Entity for North Carolina to administer the Broadband Equity, Access and Deployment (BEAD) Program. NCDIT houses the Division of Broadband and Digital Opportunity, and within the division is the Broadband Infrastructure Office, responsible for implementing North Carolina's subgrantee selection. North Carolina's BEAD allocation from the federal government is \$1.53 billion. The NTIA's Notice of Funding Opportunity (NOFO) for the BEAD program describes the requirements under which it will award grants for the Program. Additionally, on June 6, 2025, the NTIA released its BEAD Restructuring Policy Notice (Notice). This Notice modifies and replaces certain requirements outlined in the NOFO.

North Carolina's Initial Proposal Volume II (IPV2) outlined how the state would implement its subgrantee selection processes. North Carolina's IPV2 was approved by the NTIA on Sept. 18, 2024. With a focus on almost \$1 billion in American Rescue Plan Act (ARPA) Funding for broadband infrastructure, North Carolina had not yet run its BEAD subgrantee selection process. The BEAD Restructuring Policy Notice of June 6, 2025, required states to submit a letter to NTIA within 30 days of the new Notice to confirm that they would modify their previously approved subgrantee selection processes to conform to the terms of the Notice. North Carolina submitted this letter to the NTIA on June 27, 2025, to request a correction of IPV2 to conform with the Notice. No other changes to IPV2 were allowed by NTIA at this time. This letter was approved by the NTIA on July 7, 2025.

North Carolina committed to run its Subgrantee Selection process in accordance with the new Notice, including completing the subgrantee selection process and submitting its Final Proposal to NTIA by Sept. 4, 2025. The state took the following steps to align with the new processes:

Examined all guidance documents to ensure program consistency

- Infrastructure Investment and Jobs Act
- NTIA's Notice of Funding Opportunity
- North Carolina's Initial Proposal Volume I
- North Carolina's Initial Proposal Volume II
- State BEAD Legislation (S.L. 2024-55)

- NTIA's BEAD Restructuring Policy Notice

Coordinated with state leadership on conflicts with state BEAD legislation

The BEAD program is referenced in the following North Carolina Session Laws: Session Law 2022-69, Session Law 2022-74, Session Law 2023-134 and Session Law 2024-55. In November 2024, the N.C. General Assembly passed Session Law 2024-55 (S.L. 2024-55) outlining requirements for implementation of the Program and the subgrantee selection process by NCDIT and the Broadband Infrastructure Office within the Division of Broadband and Digital Opportunity. The BEAD Restructuring Policy Notice conflicted with several terms, definitions and statutory requirements in North Carolina's SL 2024-55. NCDIT subsequently worked with state lawmakers to align state legislation with the new federal requirements. Section 10.2.(b) of the state legislation, "Consistency with Federal Law", identifies order of precedence in case of conflict pointing to the Infrastructure Investment and Jobs Act (IIJA) and allowing a process to coordinate with the N.C. General Assembly to resolve conflicts. NCDIT pursued this coordination to align state law with the Notice. On Aug. 6, Session Law 2025-89 passed into law, aligning state law with the BEAD Restructuring Policy Notice.

Updated prequalification guidance and response form

North Carolina launched its initial BEAD prequalification process on Sept. 16, 2024, with responses due Nov. 1. Participation in this prequalification window was optional. This goal of this early prequalification window was to provide flexibility for broadband providers and ample opportunity to complete the qualification process. With Hurricane Helene hitting North Carolina in late September 2024, the prequalification deadline was extended to Feb. 3, 2025, to accommodate competing demands as providers worked to restore service impacted by the disaster.

NCDIT then relaunched its prequalification window on May 30, 2025, as the state moved closer to launching its Subgrantee Selection Process, with materials due June 30. Following release of the BEAD Restructuring Policy Notice with the new Subgrantee Selection timeline, NCDIT subsequently re-released requirements for the prequalification window to align with the new BEAD timing and to remove items no longer required for the program. Earlier materials submitted by broadband providers were still relevant and still reviewed and utilized.

The final BEAD prequalification window was reopened on June 20, 2025, and NCDIT republished the following updated documents in alignment with the Restructuring Policy Notice:

- Prequalification Guidance
- Prequalification Response Form
- Prequalification Check List
- Prequalification FAQs

The deadline to submit applications/information to prequalify was 11:59 p.m. on July 7, 2025. To align with the new subgrantee selection timeline, all broadband providers that wished to participate in the BEAD program were required to submit their prequalification

materials by the July 7 prequalification deadline.

Published BEAD planning map of preliminary eligible Broadband Serviceable Locations (BSLs) on June 20

- Confirmed final BEAD eligible locations
- Cross walked ARPA-funded Completing Access to Broadband program award locations to v.4 of the fabric and removed from eligibility
- Provided Unlicensed Fixed Wireless (ULFW) challenge window
- Submitted final BSL list to NTIA

Updated and further developed draft application materials to comply with new guidelines:

- Updated processes for project areas, scoring matrix, negotiation
- Developed materials in grants portal (Enterprise Business Services/EBS system)
- Developed reasonable timelines for application submission vs. review

Published the following final materials:

- Updates to [NC BEAD Planning Tool](#) (data/map of eligible locations) - July 7, 2025
- [Subgrantee Selection Guidance for Last-Mile Deployment Projects](#) - July 11, 2025
- [Application Materials](#) - July 11, 2025
- [Process for NO BEAD Submission](#)

NCDIT held a webinar on application requirements on July 22 for prequalified applicants. Applications were due to NCDIT by 11:59p.m. on July 30. Applications were vetted for completeness, assessed for priority/non-priority determinations and scored according to processes published by NCDIT. (See requirement 12 on methodology for Priority/Non-Priority determinations. See requirement 13 on subgrantee selection certification and scoring.) NCDIT also engaged in direct negotiation with prequalified applicants to work to ensure connectivity solutions for the state in the time available.

The projects North Carolina is recommending for award under this subgrantee selection round total \$408,511,175.10. As of the submission of this Final Proposal, NCDIT has identified \$1,124,488,306.05 in remaining BEAD funds to be allocated to eligible activities under Section IV.B.7.a.iii of the NOFO. Per Section 5 of the Restructuring Policy Notice, NCDIT understands that BEAD funding for non-deployment activities is subject to future NTIA and NIST Grants Office guidance.

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

NCDIT's Broadband Infrastructure Office is responsible for administering one state-funded broadband infrastructure grant program and four American Rescue Plan Act-funded programs, in addition to the BEAD program. The Office works to ensure fair, open and competitive processes in all its programs. Clear guidance documents and processes are published online and communicated to stakeholders, applicants and awardees. The Office offered and implemented a long and extensive prequalification process to ensure participation from as many broadband providers and technology types as possible. The scoring process for the BEAD program was much simpler than other programs. The scoring focused on cost/BEAD outlay, with no room for subjectivity. Staff of the Broadband Infrastructure Office served as reviewers, consistent with the Office's five other broadband infrastructure programs. The combined team has decades of experience in broadband, grants management and mapping.

The Office's staff was supported by the N.C. Center for Geographic Information and Analysis who managed data and mapping processes for application review. In addition, CTC Technologies provided strategic and advisory support on BEAD as well as engineering analysis. KPMG provided strategic and advisory support on BEAD as well as financial analysis and coordination of prequalification of applicants.

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

In compliance with the Policy Notice, NCDIT published the following processes regarding subsequent selection rounds and direct negotiation in its *Subgrantee Selection Guidance for Last-Mile Broadband Deployment Projects*.

After the initial subgrantee selection, NCDIT may conduct additional application rounds or direct negotiation to achieve universal BEAD service coverage. NCDIT will choose whether to conduct additional rounds or direct negotiations on a county-by-county basis. NCDIT may launch time-limited bidding rounds where no applications were received, or preliminary assignments made for unserved or underserved Broadband Serviceable Locations (BSLs) or Community Anchor Institutions. These rounds will allow applicants to submit cost proposals for individual BSLs or a group of BSLs. If proposals are rejected, NCDIT may negotiate directly with the original applicant or other applicants preliminarily awarded or serving nearby or adjacent locations.

Alternatively, NCDIT may bypass additional rounds and negotiate directly with prequalified applicants. In cases where no prequalified applicant has expressed interest in an area, NCDIT may prioritize direct negotiation with prequalified applicants with infrastructure in the area based on FCC Broadband Data Collection service data. NCDIT will prioritize negotiations with preliminary Priority Broadband Project awardees in these areas. Incentives may include reducing or waiving the match requirement

(subject to approval by NTIA) or additional funds. NCDIT may reject any proposal where the project cost is excessive or significantly increases the cost of the program.

As outlined above, NCDIT did engage in direct negotiation with prequalified broadband providers to work to ensure coverage for locations across the state. No subsequent selection rounds were utilized. All preliminary awards were made in one funding round.

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

North Carolina's letter to the NTIA on June 27 requested an Initial Proposal (IP) correction pursuant to the BEAD Restructuring Policy Notice. The initial data set for BEAD included 1,215 Community Anchor Institutions (CAIs). This letter confirmed the removal of 139 Community Anchor Institutions in the community support categories below to align with the new NTIA restructured CAI definition:

- Correctional Facilities
- Cultural Sites: Aquarium
- Cultural Sites: Museum
- Historic Sites
- Visitors Centers
- Welcome Centers

In addition, in NTIA's further clarifying the re-defining of community support organization in question 2.26 of the BEAD FAQ, an additional 234 CAIs were removed from the list in the following categories:

- 7 Agricultural CAI (USDA sites)
- 203 Government Facilities
- 4 Faith based institutions
- 20 Nonprofit institutions

This additional change resulted in 842 eligible CAIs.

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

Yes.

2. Intentionally Omitted

This section is intentionally left blank. The BEAD program Notice of Funding Opportunity does not include a Requirement 2 for the Final Proposal.¹ Section 2 is also omitted from NTIA’s “BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)” (July 2025).

3. Timeline for Implementation (Requirement 3)

3.1 Text Box: Has the Eligible Entity taken measures to:

(a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant;

(b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the period of performance, in accordance with 2 C.F.R. 200.344; and

(c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

Yes. NCDIT's Subgrantee Selection Guidance for Last-Mile Broadband Deployment Projects stated timeline requirements for all applicants. *All subgrantees that receive BEAD program funds for network deployment must deploy the planned broadband network and begin providing services to each customer that desires broadband services within the project area not later than four years after the date on which the subgrantee receives the subgrant from the Eligible Entity. Service must be maintained throughout the 10-year federal interest period or period of performance.*

In addition, relevant timelines are included in the NC BEAD Grant Agreement and comply with 2 C.F.R. 200.344.

4. Oversight and Accountability Processes (Requirement 4)

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

Yes. Individuals can make reports to reduce and prevent fraud in the state government of North Carolina.

For the report of any suspected incidents of fraud, waste or abuse, there are state laws that grant Whistleblower Protection.

- State Employees: State law requires that you report fraud, and the law protects you from retaliation. ([§126-84](#); [126-85](#))
- Everyone: State law keeps your identity confidential, and it will NOT be released to the public. ([§143-748](#))

Individual can report tips to FWA@doa.nc.gov or FWA@osbm.nc.gov or call the hotline at 984-236-0015

Additional details can be found in the below links:

- [Report Fraud Waste Abuse | NC OSBM](#) – <https://www.osbm.nc.gov/stewardship-services/report-fraud-waste-abuse>
- [Report DOA Fraud, Waste and or Abuse | NC DOA](#) <https://www.doa.nc.gov/report-doa-fraud-waste-and-or-abuse>
- [Report Fraud, Waste Or Abuse](#) <https://www.ncdot.gov/about-us/board-offices/offices/inspector-general/Pages/report-fraud-waste-abuse.aspx>
- [State Auditor's Tipline | NC Auditor](#)

<https://www.auditor.nc.gov/tipline#:~:text=How%20to%20Report%20Fraud%2C%20Waste,Fax%3A%20919%2D807%2D7647>

4.2 Attachments (Required): Upload the following two required documents:

4.2(1) BEAD Program Monitoring Plan

4.2(2) Agency policy documentation which includes the following practices:

a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and

b. Timely subgrantee (to Eligible Entity) reporting mandates

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (NC BEAD Program Monitoring Plan).

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (NC BEAD Grant Agreement). All elements of the required agency policy documentation are included in this draft grant agreement for subgrantees.

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

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

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

5. Local Coordination (Requirement 5)

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

The response must demonstrate Eligible Entity met the following requirements:

- a. The public comment period was no less than 7 days; and*
- b. Political subdivisions were afforded an opportunity to submit comments during the comment period.*

NCDIT will post its Final Proposal on its website at www.ncbroadband.gov for seven days. The posting will be aligned with a press release to notify stakeholders that the Final Proposal is available for review. Stakeholders are requested to submit comments as follows:

Comments should be submitted to BEAD@nc.gov with the following details:

- Commenter's name
- Commenter's organization
- Is the organization a public entity? (Yes/No)
- Which Final Proposal section or attachment this comment addresses (e.g., Section 6.1)
- Comment

After reviewing all commentary, NCDIT will consider and incorporate comments as feasible. NCDIT will submit the Final Proposal to NTIA by Sept. 4 with the recommended BEAD funding awards to internet service providers.

6. Challenge Process Results (Requirement 6)

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

Yes. NCDIT completed the challenge process and received approval of the results from the NTIA.

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

The details of North Carolina's challenge process are detailed in the BEAD Initial Proposal Volume I (IPV1). North Carolina launched its challenge process on Sept. 3, 2024. Challenge types and evidentiary standards were consistent with NTIA standards and NC's IPV1. In late 2024, North Carolina received an extension of 90 days for the process due to the impacts from Hurricane Helene which hit the state in September 2024. Following the challenge window, North Carolina implemented its BEAD Challenge Rebuttal Phase which ended Feb. 20, 2025. North Carolina submitted its final data from the challenge process to NTIA on April 3, 2025. On May 8, 2025, the NTIA approved North Carolina's BEAD state challenge process results. This data set included 171,573 unserved and underserved eligible broadband serviceable locations (BSLs) and 1,215 Community Anchor Institutions. CostQuest BSL fabric v4 is utilized for North Carolina's BEAD data set.

To comply with the BEAD Restructuring Policy Notice as well as to account for additional state awards made in North Carolina since completion of the challenge process, the BEAD eligible locations data set approved by the NTIA on May 8 was further modified as follows:

- From March through early June 2025 NCDIT awarded projects for last-mile broadband deployment to unserved and underserved BSLs across the state through Round 2 of its Completing Access to Broadband (CAB) Program. This program is funded with American Rescue Plan Act State and Local Fiscal Recovery Funds and Capital Project Fund dollars. The updated BEAD dataset includes removal of CAB Round 2 awards impacting 60,747 unserved and underserved BSLs from the original BEAD post-challenge locations.
- Removal of 7,016 eligible locations that are not present in v6 of the BSL fabric, and transferal of these locations to the non-BEAD eligible list under NTIA reason code 3.
- No modifications were made based on federal defaults subsequent to confirmation received from NTIA that no recent federal defaults were found that would still need to be incorporated at this time.

- North Carolina received no data submissions from unlicensed fixed wireless (ULFW) providers following posting of the notification to providers for submission of evidence that BEAD funding is not required for relevant locations where they currently report service.
- Removal of 139 eligible Community Anchor Institutions (CAIs) in the community support subcategories below, to align with the new NTIA restructured CAI definition.
 - Correctional Facilities
 - Cultural Sites: Aquarium
 - Cultural Sites: Museum
 - Historic Sites
 - Visitors Centers
 - Welcome Centers

This updated data set was submitted on June 27, 2025, to NTIA for approval, and NTIA approved the data set on July 7, 2025. In addition, subsequent to submitting locations to NTIA, an additional 50 locations were removed in Burke County due to a locally funded broadband project.

The final data set for BEAD included: 103,760 eligible Broadband Serviceable Locations (56,088 unserved and 47,672 underserved locations) and 1,076 eligible Community Anchor Institutions, subsequently revised to 842 eligible CAIs based on NTIA's updated definitions.

The eligible locations have been published on the BEAD Challenge Process web page at <https://www.ncbroadband.gov/BEADchallenge> as well as in the NC BEAD Planning Tool, online mapping tool, at <https://www.ncbroadband.gov/BEADchallenge>.

7. Unserved and Underserved Locations (Requirement 7)

Coverage of Unserved Locations

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

Yes. North Carolina will ensure coverage of broadband service to all unserved locations based on BEAD program definitions and utilizing the combination of technology types required under the BEAD program.

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

N/A

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

N/A

Coverage of Underserved Locations

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

Yes. North Carolina will ensure coverage of broadband service to all underserved locations based on BEAD program definitions and utilizing the combination of technology types required under the BEAD program.

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

N/A

- 7.6 Attachment (Optional):** If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

N/A

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

Yes.

7.8 Intentionally omitted

This question is intentionally left blank. Question 7.8 is omitted from NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025).

7.9 Intentionally omitted

This question is intentionally left blank. Question 7.9 is omitted from NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025).

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

Yes.

8. Intentionally Omitted

This section is intentionally left blank. Section 8 is omitted from this Final Proposal based on NTIA's "BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)" (July 2025), which removes Requirement 8 from the Final Proposal per the BEAD Restructuring Policy Notice.

9. Intentionally Omitted

This section is intentionally left blank. Section 9 is omitted from this Final Proposal based on NTIA’s “BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)” (July 2025), which removes Requirement 9 from the Final Proposal per the BEAD Restructuring Policy Notice.

10. Intentionally Omitted

This section is intentionally left blank. Section 10 is omitted from this Final Proposal based on NTIA’s “BEAD Final Proposal Guidance for Eligible Entities (Version 2.1)” (July 2025), which removes Requirement 10 from the Final Proposal per the BEAD Restructuring Policy Notice.

11. Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience (Requirement 11)

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

North Carolina's Initial Proposal Volume 2 identifies steps that North Carolina has taken or will take to reduce costs and barriers to deployment such as:

- a. Promoting the use of existing infrastructure;
- b. Promoting and adopting dig-once policies;
- c. Streamlining permitting processes;
- d. Streamlining cost-effective access to poles, conduits, easements; and
- e. Streamlining rights of way, including the imposition of reasonable access requirements.

This work is in progress and remains ongoing. Currently, the Broadband Infrastructure Office has 321 broadband infrastructure projects in process that are funded through the Growing Rural Economies with Access to Technology (GREAT) grant program and the Completing Access to Broadband (CAB) program. These American Rescue Plan Act-funded programs total \$674 million and will provide broadband service to 255,570 Broadband Serviceable Locations. In addition, the state has significant infrastructure investments underway through private investment. Continuing to work with our broadband providers and relevant stakeholders on reducing barriers is of critical importance.

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

Yes.

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

N/A

11.4 Question (Y/N): Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.¹

Yes.

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

N/A

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

Yes.

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

¹ See, BEAD Final Proposal Guidance, NTIA, p. 60; “The federal interest period for BEAD-funded broadband infrastructure projects is ten years after the year in which the relevant subgrant has been closed out in accordance with 2 C.F.R. § 200.344. See General Terms and Conditions for NTIA BEAD Program Funds at 21 (Apr. 2024), https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf.”

12. Substantiation of Priority Broadband Projects (Requirement 12)

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

North Carolina applied the definition of Priority Broadband Project as defined in the BEAD Restructuring Policy Notice (Policy Notice) and the Infrastructure Investment and Jobs Act (Infrastructure Act or IIJA), meaning that a Priority Broadband Project must demonstrate the network will achieve:

- Speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads (100/20 Mbps)
- Latency less than or equal to 100 milliseconds
- Easy scalability to support advanced wireless services and future applications

The state took a technology-neutral approach to its analysis. Each applicant was allowed to request that their project be considered a Priority project. To determine which applications meet the requirements for Priority Broadband Projects (as defined in the Infrastructure Act and the Policy Notice), NCDIT contracted an experienced broadband engineering team to develop technical evidence templates for the Benefit of the Bargain Round project application and then to objectively review the applications received.

The following sections describe the way in which NCDIT applied the definition of Priority Broadband Projects in an objective, technology-neutral manner.

Framework for the state's technical review of Benefit of the Bargain Round applications

The state undertook an analysis designed to align with the requirements of NTIA's Policy Notice. Per those requirements, that analysis determined:

1. **First, whether the applicant complied with the data submission requirements of the Policy Notice**, which provides that "[a]pplicants must provide supporting documentation sufficient for the Eligible Entity to assess the network application and determine that the proposed network architecture for each specific project area meets this standard" (Policy Notice, page 9).
2. **Second, if the applicant did provide sufficient data to enable the appropriate analysis, whether the proposed project meets the Policy Notice's requirements for a Priority Broadband Project**, which is defined as "a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses

and support the deployment of 5G, successor wireless technologies, and other advanced services” (Policy Notice, p. 9).

Methodology

To make these determinations (i.e., to apply the definition of Priority Broadband Projects), the state developed a methodology for engineering review that was designed to align with the Infrastructure Act, NTIA’s Policy Notice, and NTIA’s BEAD Frequently Asked Questions and Answers Version 12 (FAQ) (https://broadbandusa.ntia.gov/sites/default/files/2025-07/BEAD_FAQs_v12.pdf). The FAQ requires that states “establish a review methodology that addresses each component of the statutory definition of a Priority Broadband Project and that can be fairly applied to assess all proposed projects that request Priority Broadband Project Status.” (FAQ 3.23, pp. 42-43).

The methodology was designed to ensure a project-by-project, area-by-area determination that enables every applicant to demonstrate that its proposed project meets the Priority requirements for the specific geographic area for which that project is proposed, as directed by the FAQ, which states that “an Eligible Entity may determine that an applicant with several project proposals across the state may not merit Priority Broadband Project status for all proposals if a proposed technical capability showing is not sufficiently tailored to a given project area” (FAQ 3.23, p. 43).

The following is a brief summary of the methodology used by the state to evaluate the applications to determine whether the proposed projects meet the requirements to be considered Priority Broadband Projects.

The methodology enabled fair consideration of all applications, regardless of the technology type proposed, to allow for an informed, data-driven determination of whether a given project is capable of meeting the Priority Broadband Project definition.

Data evaluated

The engineering review was based on data provided in each Benefit of the Bargain Round project application. The data were requested in the application according to technology, with data requests designed to elicit the appropriate information for the state to fulfill the NTIA mandate to analyze whether the applicant’s proposed project met the requirements of the BEAD definition of “Priority Broadband Service” in the specific area proposed in that application.

While the assessment was technology-neutral, the state’s requests for data were adapted to the specific technologies proposed by each applicant to ensure that, to the extent that applicants provided sufficient documentation, the reviewers had access to the relevant and appropriate data to enable an informed, data-driven determination of Priority status.

This approach was modeled on NTIA’s guidelines in the Policy Notice for unlicensed fixed wireless (Policy Notice, Appendix A) and LEO satellite broadband services (Policy Notice, Appendix B); those guidelines addressed the unique challenges of evaluating specific technologies while maintaining technology-neutral functional standards.

The state's data requests were designed to elicit the appropriate information from the applicants for the following technology types:

1. Fiber
2. Hybrid fiber-coaxial (cable)
3. Licensed fixed wireless
4. Unlicensed fixed wireless
5. Low-Earth orbit (LEO) satellite

Applicants proposing a project with more than one technology (such as a hybrid fiber/fixed wireless project) were requested to provide data in both categories for the relevant BSLs.

The data requests were also designed to place the least burdensome possible requirements on the applicants while still eliciting sufficient information for the state's Priority analysis to be performed in an informed and data-driven manner. For example, spreadsheet templates requesting data at the BSL level were designed to enable applicants to easily transfer data derived from the network modeling software that is used in the broadband industry to develop conceptual-level designs and that is used to develop designs appropriate for a grant application.

Analyses conducted

The following are the specific analyses conducted for each proposed project, by technology type:

Fiber

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide "supporting documentation sufficient for [the state] to assess the network application." In the event the applicant's data submission was determined to be sufficient for this purpose, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Assess the proposed technology type (i.e., end-to-end fiber project)
- Review the applicant's data to assess the capacity in the proposed access and distribution network
- Review the applicant's data to assess the proposed backhaul capacity
- Review the applicant's data to assess the proposed latency
- Review the applicant's data to assess whether the network is easily scalable to support evolving connectivity needs

Proposed fiber projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

Hybrid fiber-coaxial

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide “supporting documentation sufficient for [the state] to assess the network application.” In the event the applicant’s data submission was determined to be sufficient, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Assess the proposed technology type (i.e., DOCSIS version)
- Review the applicant’s data to assess the capacity in the proposed access and distribution network
- Review the applicant’s data to assess the proposed backhaul capacity
- Review the applicant’s data to assess the proposed latency
- Review the applicant’s data to assess whether the network is easily scalable to support evolving connectivity needs

Proposed hybrid fiber-coaxial projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

Licensed fixed wireless

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide “supporting documentation sufficient for [the state] to assess the network application.” In the event the applicant’s data submission was determined to be sufficient, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Review the information submitted by the applicant on spectrum use, network equipment, tower details, sector antenna details, antenna and radio specifications, customer premises equipment (CPE) specifications, signal strength at each proposed BSL, upstream and downstream speed at each BSL, and backhaul
- Review data from the applicant-submitted planning model and compare that model to theoretical maximums (e.g., free-space path loss)
- Review the applicant-submitted planning model to assess whether it adequately accounts for the effects of natural and physical features of the project area, such as terrain and foliage
- Review the applicant’s data on the capacity to serve the proposed BSLs in the project area considering the BSLs’ locations and physical clustering

- Review the applicant's data to assess the ability of the applicant's network to meet Priority throughput criteria for all BSLs in the proposed project area
- Review the applicant's data to assess the ability of the applicant's network to easily scale to support evolving connectivity needs
- Review the applicant's data to assess the ability of the applicant's network to support 5G and advanced services

Proposed licensed fixed wireless projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

Unlicensed fixed wireless

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide "supporting documentation sufficient for [the state] to assess the network application." In the event the applicant's data submission was determined to be sufficient, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Review the information submitted by the applicant on spectrum use, network equipment, tower details, sector antenna details, antenna and radio specifications, customer premises equipment (CPE) specifications, signal strength at each proposed BSL, upstream and downstream speed at each BSL, and backhaul
- Review the applicant's ability to mitigate potential interference
- Review data from the applicant-submitted planning model and compare that model to theoretical maximums (e.g., free-space path loss)
- Review the applicant-submitted planning model to assess whether it adequately accounts for the effects of natural and physical features of the project area, such as terrain and foliage
- Review the applicant's data on the capacity to serve the proposed BSLs in the project area considering the BSLs' locations and physical clustering
- Review the applicant's data to assess the ability of the applicant's network to meet Priority throughput criteria for all BSLs in the proposed project area
- Review the applicant's data to assess the ability of the applicant's network to easily scale to support evolving connectivity needs
- Review the applicant's data to assess the ability of the applicant's network to support 5G and advanced services

Proposed unlicensed fixed wireless projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

Low-Earth orbit (LEO) satellite

Engineers first reviewed the application to determine whether the applicant met the requirement established in the Policy Notice to provide “supporting documentation sufficient for [the state] to assess the network application.” In the event the applicant’s data submission was determined to be sufficient, engineers then undertook the following steps to determine whether the proposed project met the standards for a Priority Broadband Project:

- Review the information submitted by the applicant on spectrum use, satellites, service area, Earth stations, and CPE specifications
- Review the applicant’s depiction of its beam area superimposed on the proposed project area to assess the available capacity for the proposed project area
- Review the applicant’s area-specific assessment of capacity, including for proposed BSLs and other users
- Review the applicant’s data and narrative describing backhaul capacity
- Review the applicant’s data and narrative describing sky view, the impact of obstructions such as foliage, and the applicant’s strategy for managing the challenges
- Review the applicant’s data and narrative describing the number of available satellites per user and the effect of handoffs on performance
- Review the applicant’s data and narrative describing latency, jitter, and packet loss under regular conditions and handoff
- Review the applicant’s area-specific assessment of its network’s capacity to support evolving connectivity needs

Proposed LEO projects that met the standards as defined in the Infrastructure Act and the Policy Notice were considered to be Priority Broadband Projects.

13. Subgrantee Selection Certification (Requirement 13)

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

The Eligible Entity must describe the following:

1. *A summary of how the Eligible Entity applied the "Minimal BEAD Program Outlay" scoring criteria to each competitive application*
2. *If secondary criteria were applicable according to the BEAD Restructuring Policy Notice, a summary of how the Eligible Entity applied the criteria, (i.e., how points were assigned within each criterion) and identify the corresponding weights assigned to each criterion:*
 - *Speed to deployment; and*
 - *Speed of network and other technical capabilities as defined by the Eligible Entity;*
 - *For locations where Eligible Entities have already completed their subgrantee selection process and identified preliminary or provisionally selected subgrantees, Eligible Entities will give additional weight to Preliminary/Provisional Subgrantees.*

Under the NTIA's BEAD Restructuring Policy Notice, the scoring criteria previously outlined in the NOFO were revised to focus on minimizing the cost of deployment under the BEAD program. In compliance with the Policy Notice, NCDIT published the following processes in its *Subgrantee Selection Guidance for Last-Mile Broadband Deployment Projects*. These are the processes implemented for selection of recommended projects.

The NTIA's BEAD Restructuring Policy Notice defines the primary scoring criteria for the last-mile deployment projects as follows: in deciding among competing applications covering the same general project areas, Eligible Entities must choose the option with the lowest cost based on minimal BEAD program outlay. The NTIA's FAQsV10 also includes the following clarification: when scoring competing Priority Broadband Projects and competing non-Priority Broadband Projects, the Notice directs Eligible Entities to prioritize "minimal program outlay," which focuses on the overall cost to the BEAD program. Eligible Entities can balance a variety of factors in deciding among competing applications, including cost per location, cost per project, and the combination of proposals with the lowest overall cost to the program. Eligible Entities also have significant flexibility when deciding among proposals that are cost-competitive (i.e. within 15% of one another). Eligible Entities have discretion to weigh cost-competitive proposals based on three criteria: speed to deployment, speed of network, and prior identification or selection.

In compliance with the Policy Notice, NCDIT will select the combination of project proposals with the lowest overall cost to the Program. This may involve selecting a proposal that is the lowest-cost option for a given set of BSLs or is part of the combination of selected projects with the lowest overall cost to the Program. When comparing competing proposals, the NCDIT will assess the total BEAD funding that will be required to complete the project (i.e., the total project cost minus the applicant's proposed match) and the cost to the Program per location (i.e., the total BEAD funding that will be required to complete the project divided by the number of BSLs the project will serve). NCDIT is not considering speed to deployment as a secondary scoring criteria. In addition, "prior identification or selection" as discussed in the Notice is not relevant to North Carolina as the state had not previously run a subgrantee selection round.

Priority Broadband Projects will receive prioritization for award followed by Non-Priority Projects

NCDIT will preliminarily assign projects for award for Priority Projects with non-overlapping project areas (BSLs) where the cost of the proposed project is not excessive. NCDIT will then start the deconfliction process for applications that propose to serve overlapping Project Areas, beginning with the highest-ranking application, where the proposed project cost is not excessive. NCDIT will repeat the process with the next highest-ranking application until all locations have been preliminarily assigned. NCDIT may also offer applicants the opportunity to reduce their proposed costs for projects with excessive costs. (An excessive cost threshold has not been set by NCDIT but will be assessed based on comparable and competing projects.)

NCDIT selected projects based on lowest grant cost per location, assessing priority broadband projects and then projects deemed to be non-priority broadband projects. As stated in NCDIT's guidance, speed to deployment was not considered. Due to the large volume of broadband deployment in the state, project timelines may be unpredictable. Speed of network and other technical capabilities was considered in as much as it may have affected Priority/Non-Priority designations. The Preliminary/Provisional Subgrantees criterion was not relevant as North Carolina had not run a prior subgrantee selection round. Projects were scored and deduplicated as outlined above.

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

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

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

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (Environmental and Historic Preservation Documentation).

15. Consent from Tribal Entities (Requirement 15)

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

Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land.

The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

NCDIT is recommending award to Cherokee Cablevision for the majority of eligible locations located on North Carolina's Tribal Lands of the Eastern Band of the Cherokee Indians (EBCI). Cherokee Cablevision is owned by the EBCI. NCDIT is coordinating with the Tribe regarding other projects in this area, including projects that may pass through tribal lands. NTIA's Programmatic Waiver provides a conditional limited programmatic waiver related to the deadline requirements set for in section IV.B.9.b.15 of the BEAD Program Notice of Funding Opportunity (NOFO), which requires the submission of Resolution(s) of Consent from the relevant Tribal Government(s) within an Eligible Entity's Final Proposal. If it is determined that consent is required for any locations NCDIT will coordinate with the Tribe to submit the relevant Tribal Consent during the curing process.

16. Prohibition on Excluding Provider Types (Requirement 16)

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

Yes.

17. Waivers

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

A waiver request is being submitted on behalf of 3,084 locations that request a waiver for the 25% non-federal match requirement.

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

See attachment at <https://www.ncbroadband.gov/BEADFinalProposal> (Waiver Request Form).



5511 Capital Center Blvd. | Suite 400, Raleigh, NC 27606
866-389-5650 | ncaarp@aarp.org | twitter: @aarpnc
facebook.com/AARPNC/

September 4, 2025

Commenter's name: [REDACTED]

Commenter's organization: AARP North Carolina

The organization is not a public entity

Comment Section referenced in **bold** below

AARP North Carolina appreciates the significant work that the Department of Information Technology (NCDIT) team has undertaken to revise its Broadband Equity, Access, and Deployment (BEAD) program. The scope of this effort reflects a serious commitment to ensuring that the promise of broadband reaches communities and individuals across our state.

(Section 0.5) - AARP North Carolina applauds NCDIT for including many older adult-serving and frequented locations in its broadband strategy. These locations are trusted, familiar, and accessible to older residents, making them natural gateways for expanding digital opportunity. Libraries are often the first place older adults turn for free internet access, device support, and digital learning opportunities. Other community anchors play an equally critical role in delivering training, providing devices, and building confidence. By leveraging these established and trusted networks, NCDIT is not only expanding access to broadband service but also creating environments where older adults can feel supported in learning and applying new digital skills.

(Section 1.1) - AARP North Carolina notes that increasing demand for connectivity means that both internet access and the ability to use it are equally important and will require continuous stewardship. AARP supports NCDIT seeking additional opportunities to support initiatives that will deepen the impact of these broadband infrastructure investments for North Carolina. The June 2025 BEAD Policy Notice highlights that funding for other allowable uses is under review and that the National Telecommunications Information Administration will provide updated guidance in the future. AARP North Carolina encourages NCDIT to consider using available BEAD non-deployment funds to support digital skills development, device access, and other priority initiatives to improve digital adoption in the state.

Digital skills training is essential for older adults. North Carolina's Digital Equity Plan found widespread need for digital skill building, especially among older adults. AARP North Carolina encourages NCDIT to invest in training programs delivered through trusted, older adult-friendly community locations such as libraries, community colleges, and senior centers. These programs should provide hands-on practice in everyday skills, such as safe internet use, online banking, telehealth access, and communication tools, so that older Iowans can build confidence and independence in navigating the digital world. Sustained investment in digital skills will ensure that broadband infrastructure investments translate into meaningful use and opportunity for those most at risk of being left behind.

These investments would deepen the impact of BEAD infrastructure projects and ensure that older adults, as well as other populations at risk of digital exclusion, are equipped to fully benefit from the broadband expansion.

AARP North Carolina commends NCDIT's efforts thus far and looks forward to seeing these investments build a more connected, inclusive, and future-ready North Carolina.

If you have any questions, reach out to: [REDACTED]
[REDACTED]

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

Vernonburg Group LLC files these comments in response to North Carolina's draft Broadband, Equity, Access, and Deployment (BEAD) Final Proposal. As explained below, Vernonburg Group applauds NCDIT for embracing the full range of technology to ensure that all unserved and underserved locations across the state will have access to the internet. Further, we encourage North Carolina to notify the National Telecommunications and Information Administration that it intends to use the remaining \$1.124 billion of its BEAD allocation to pursue other important statutory objectives as outlined by the bipartisan Congress, including broadband adoption efforts.

Vernonburg Group is a consulting firm comprised of telecommunications specialists who are working to bring about a world with meaningful internet connectivity for every person and community. We help governments, companies, and other organizations achieve this by developing supportive policy frameworks, forging partnerships, mobilizing capital, and providing actionable, data-driven insights. We have worked with a myriad of stakeholders over the past three years to help them plan on how best to leverage BEAD in closing the digital divide. Vernonburg Group believes that all North Carolinian should be able to take full advantage of the newly-expanded broadband networks—so that farmers can integrate smart technologies into their operations, more families can reach healthcare providers, and students and educators across the Tar Heel State can thrive inside and out of the classroom.

In its latest funding guidance, National Telecommunications and Information Administration (NTIA) directed state and territorial broadband offices to take a technology neutral approach to assessing competing applications for BEAD network deployment subgrants. Based on the results from North Carolina's subgrantee selection process, the state has embraced this guidance and is leading the charge by allocating its BEAD deployment funds to a mix of technologies, ensuring broadband service to all unserved and underserved locations.

Additionally, as a good steward of the funding that a bipartisan Congress provided, North Carolina was able to meet the deployment objective of the BEAD program while preserving \$1.124 billion in funding to achieve the other critically important statutory objectives of the BEAD program, including non-deployment activities. Vernonburg Group calls this the "digital opportunity dividend," which can be generated if states follow North Carolina's example and choose to distribute BEAD funds to a healthy range of broadband technologies. Our [Broadband Technology Optimization Tool](#) demonstrates the full scale of the digital opportunity dividend across the country. North Carolina should leverage its digital opportunity dividend to ensure that its BEAD funds can deliver maximum impact to all North Carolinian.

As we explained in detail in [our blog](#) following release of the Restructuring Policy Notice, pursuant to the Infrastructure Investment and Jobs Act (47 U.S.C. § 1702(f)), the state of North Carolina is fully authorized to use remaining funds for non-deployment purposes. By clearly communicating to NTIA that North Carolina intends to make use of its full allocation, perhaps as part of a cover letter accompanying the Final Proposal or in one of the fields on the form, the state can better preserve its opportunity to secure these resources for essential initiatives to address North Carolina's broadband adoption gap.

These additional funds are crucial because, as our recently published paper [Avoiding the Overbuild Trap](#) demonstrates, many households remain offline because of barriers related to cost, skills, trust, or perceived relevance—not because of a lack of infrastructure. We found that comprehensive programs targeting these barriers with digital navigators, digital skilling, and service/device affordability reach twice as many households per dollar spent, compared to network deployment alone.

North Carolina has already recognized that the digital divide is not solely an infrastructure challenge and has built a strong foundation to address the multifaceted nature of the issue. Volume II of your Initial BEAD Proposal outlines several innovative and productive means of spending the remaining funds. North Carolina's approved plan leverages its existing two-track grant program to fund both state agencies and local "Digital Champion" partners in their efforts to improve internet affordability, device ownership, and digital skills training (page 39). In a unique focus on network resilience, the plan also directs funds toward ensuring residents have a reliable connection during disasters and supporting those who depend on wireless networks (page 40). None of these commitments need to be retracted—on the contrary, the billions of BEAD dollars that remain represent an unparalleled opportunity to fund these objectives without sacrificing deployment goals.

With \$1.124 billion still unallocated, North Carolina has the statutory authority to act, as well as the funds to make innovative solutions a reality. Pairing the newly awarded deployment projects with targeted adoption investments ensures that the bipartisan promise of BEAD is fulfilled: not only to connect all North Carolinian to the internet, but to empower them to thrive in the economic, educational, and civic life of the state. By making clear in your submission of the Final Proposal that North Carolina intends to fully use its BEAD allocation, you can ensure that its broadband future and digital economy deliver lasting value to every community throughout the Tar Heel State.

We appreciate the opportunity to file these comments and congratulate the NCDIT team on taking this important next step in its implementation of BEAD.



County of Dare

P.O. Box 1000 | Manteo, North Carolina 27954

To: North Carolina Department of Information Technology

From: [REDACTED]

Date: September 3, 2025

Subject: Letter of Support for the Broadband Equity, Access, and Deployment program

Dear Sirs:

I am writing on behalf of Dare County in support of the Broadband Equity, Access, and Deployment (BEAD) program to be implemented by the North Carolina Department of Information Technology's (NCDIT) Division of Broadband and Digital Opportunity. We are hopeful that this program will be approved as it will serve to benefit our coastal community which has unique telecommunications access challenges.

Dare County is a public entity that encompasses a large portion (over 100 miles) of the coast of northeastern North Carolina, colloquially known as the Outer Banks. Our beautiful coastal community is home to approximately 37,000 residents and prides itself in hosting close to 300,000 vacationers in the summer months. Our public safety infrastructure, as well as our economy, is reliant on a broadband communications network that woefully lacks redundancy and reliability. Our communities often experience network outages that threaten public safety communications due to these challenges.

Dare County appreciates the opportunity to voice our support for the Broadband Equity, Access, and Deployment (BEAD) program in the hope that a portion of its funding can be used to support our attempts in working with the private industry to address these challenges. In particular, **Section 7.4** of the BEAD Final Proposal, which addresses the need for Broadband access to underserved locations, has our full support as being one such underserved locations. Also, **Section 11**, which addresses network reliability and resilience, has our full support as we are certainly in need of reliability and resilience within our network, particularly when considering the life safety impacts that are at stake when our network fails.

Thank you for your consideration of these comments. Please reach out for any additional information or if I can answer any questions.

Respectfully submitted,

[REDACTED]



Submitted via email

September 4, 2025

Re: Frontier Communications Comments to North Carolina Department of Information Technology on Draft Final Proposal

Dear North Carolina Department of Information Technology (NCDIT):

Frontier hereby submits the below comments on NCDIT's recently published "Draft BEAD Final Proposal" for consideration.

The Draft BEAD Final Proposal addresses **NCDIT's BEAD Compliance and Monitoring Plan**. Frontier offers the following recommended modifications to facilitate project monitoring and streamline reporting procedures so that providers can focus resources on timely project execution:

- **Semiannual Reporting (pages 8-9)** – Frontier recommends that once a project has commenced for six months duration, the Semiannual Reporting requirement be aligned with a 15th of the month so that future reports are due on July 15 and January 15 to promote efficiencies and clarity of due dates for Subgrantees.
- **Annual Reporting (page 9)** – In keeping with the above comment, Frontier recommends that once a project has commenced for six months duration, the due date of the Annual Report requirement be aligned with a 15th calendar date so that future reports are due on January 15.
- **Desktop Reviews (pages 10-11)** – Frontier respectfully recommends that Subgrantees be given 15-days' notice prior to a Desktop Review by NCDIT, to allow the Subgrantee to gather all pertinent information and have appropriate staff available on a call to facilitate a productive Desktop Review.
- **Site Visits (pages 12-13)** – Frontier respectfully recommends that Subgrantees be given 15-days' notice prior to a Site Visit by NCDIT, to allow the Subgrantee to gather all pertinent information and have appropriate staff available to facilitate a productive Site Visit.

Thank you for your consideration of these points.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EducationSuperHighway Comments for North Carolina's BEAD Final Proposal

EducationSuperHighway is a national non-profit working to close the 20-25% digital divide concentrated in public and affordable housing multi-dwelling units (MDUs). We welcome the opportunity to provide feedback on the North Carolina Department of Information Technology's (NCDIT) draft BEAD Final Proposal.

We understand that the Final Proposal does not include specific plans for any remaining BEAD funds, given the absence of NTIA guidance on future eligible non-deployment uses.

An infrastructure activity that remains BEAD-eligible after the latest NTIA policy guidance is *"installing internet and Wi-Fi infrastructure or providing reduced-cost broadband within a multi-family residential building..."* (47 USC §1702 (f)(4)).¹ Future guidance for remaining BEAD funds may allow Eligible Entities to add activities that resolve in-building infrastructure bottlenecks (capacity and quality of wiring) within MDUs. If so, EducationSuperHighway recommends allocating approximately \$75M in remaining non-deployment funds to **create a targeted capital improvement program that partners with property owners to upgrade their buildings - a program similar to Tennessee's proposed \$50M [Multiple Dwelling Unit Grant Program](#) in their BEAD Final Proposal.** The program *"recognizes the need for true connectivity in multi dwelling units, be they low-income or otherwise, to ensure our constituents have the best access to reliable, scalable, high-speed broadband internet. Tennessee is prepared to fully structure and launch such a program to ensure our goal of 100% connectivity is truly met, once the State's obligated BSLs have been addressed."*²

A recommended allocation of \$75M is consistent with successful MDU grant programs administered by other states and is appropriately scaled for the number of affordable and public housing MDUs in North Carolina. Approximately 66% of residents in affordable and public housing MDUs do not subscribe to high-speed internet, highlighting the prevalence of the digital divide that persists in these communities.³ Including MDU connectivity as a funded activity allows North Carolina to close the digital divide by continuing to invest in infrastructure upgrades that accomplish the goal of Internet for All.

14 states have committed \$579 million in funding to MDU connectivity, demonstrating an increased focus on the needs of households living in MDU housing. Through our ongoing work supporting the development and implementation of many of these states' MDU programs, we have gained valuable insights into the key factors that drive property owner and service provider participation, promote administrative efficiency, and ensure competitive internet pricing for

¹ [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim))

² Tennessee's Draft BEAD [Final Proposal](#)

³ [Pew Charitable Trusts](#), "Broadband Challenges and Opportunities in Affordable Rental Housing," April 2023

residents. We have incorporated those insights and best practices into a comprehensive model [MDU grant program](#) that NCDIT can quickly adopt or adapt. This program represents a robust and actionable strategy to bridge the digital divide, saving significant time and resources. We welcome the opportunity to discuss this model program in detail and explore ways to adapt it to meet the unique needs of North Carolina residents living in MDUs.

North Carolina Building Owner Data

To date, EducationSuperHighway has engaged with property owners representing 1,784 MDU units across North Carolina who have expressed interest in participating in such a program, demonstrating clear demand from the community that is ready and willing to partner with the NCDIT to close the MDU connectivity gap.

With an investment of \$75 million of the state's non-deployment funds, North Carolina could bring connectivity to an estimated 72,500 MDU residents who lack the reliable home internet they need for students to participate in online learning, job seekers to search for employment opportunities, and individuals to access telehealth services and government resources.

COUNTY OF HYDE

30 Oyster Creek Road
PO Box 188
SWAN QUARTER, NORTH CAROLINA 27885



Resolution in Support of the BEAD Final Proposal and Enhanced Broadband Infrastructure for Ocracoke Island and Surrounding Counties

WHEREAS, the Broadband Equity, Access, and Deployment (BEAD) Program, administered by the National Telecommunications and Information Administration (NTIA), provides critical federal funding to expand high-speed internet access across North Carolina, with the goal of closing the digital divide for all residents and businesses; and

WHEREAS, the North Carolina Department of Information Technology (NCDIT) has released its Draft BEAD Final Proposal for public comment, outlining the state's progress and updated plans for broadband deployment, as described in Volumes 1 and 2 of its Initial Proposal; and

WHEREAS, Ocracoke Island, located within Hyde County, faces unique challenges due to its geographic isolation and dependence on a limited communications infrastructure, including a single undersea cable vulnerable to service interruptions; and

WHEREAS, recent events have demonstrated the risks associated with this lack of redundancy, with accidental submarine cable cuts causing dangerous and disruptive outages that affect emergency services, communications, public safety, education, and the local economy; and

WHEREAS, this persistent uncertainty around cable reliability creates daily risks for residents, businesses, healthcare providers, and emergency personnel who rely on uninterrupted connectivity to operate safely and effectively; and

WHEREAS, the proposed BEAD funding would support the installation of a submarine broadband cable connecting Ocracoke Island to Cedar Island, providing critically needed backup and failover capabilities that will end the uncertainty of future cable outages and create a stable and resilient digital infrastructure; and

WHEREAS, this additional cable infrastructure would not only serve Ocracoke Island but also enhance broadband resilience and capacity across neighboring counties, including but not limited to Carteret, Dare, and Pamlico Counties, by creating regional connectivity benefits that support emergency response coordination, economic development, and broader internet accessibility in eastern North Carolina; and

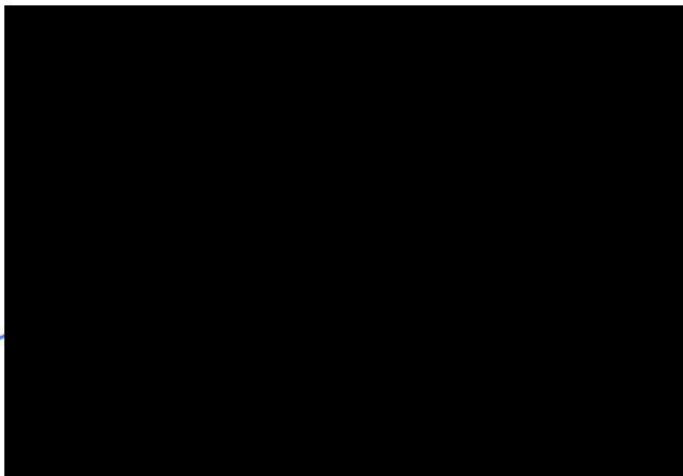
WHEREAS, expanding high-speed internet access is a matter of public safety, economic resilience, educational equity, and community wellbeing for both Hyde County and the surrounding coastal region;

NOW, THEREFORE, BE IT RESOLVED THAT:

The Hyde County Board of Commissioners hereby:

1. Fully supports the Draft BEAD Final Proposal and encourages its swift approval and implementation;
2. Urges the inclusion and prioritization of the proposed submarine cable between Ocracoke Island and Cedar Island within the BEAD-funded projects;
3. Recognizes this infrastructure as critical for public safety, emergency preparedness, and essential services not only for Ocracoke Island but also for neighboring counties that share interconnected infrastructure and emergency systems;
4. Emphasizes that this project will help end the uncertainty and disruption caused by past cable outages, providing peace of mind and stable access to critical services;
5. Encourages regional collaboration to support and advocate for broadband improvements across eastern North Carolina;
6. Submits this resolution as public comment to the North Carolina Department of Information Technology as formal input supporting the BEAD Final Proposal.

Adopted this 3rd day of September, 2025.



Commenter's name: [REDACTED]

Commenter's organization: HarvestBeam Inc., 117 Springhill Forest Road, Chapel Hill, NC 27516

Is the organization a public entity: No

Which Final Proposal section or attachment this comment addresses:

Section 12. Substantiation of Priority Broadband Projects (Requirement 12)

Comment:

HarvestBeam Inc. is a rural licensed fixed wireless service provider that owns over 28 Priority Access Licenses (PALs) in the CBRS band and submitted bids for BEAD funds in five North Carolina counties: Cherokee, Catawba, Moore, Richmond and Craven.

HarvestBeam's bids in all five counties listed above were submitted as Priority Broadband Projects based on the criteria outlined in the Infrastructure Act and NTIA's BEAD Restructuring Policy Notice (Policy Notice). HarvestBeam's bids in all five counties included the same evidence documentation demonstrating its technical capabilities to meet the criteria outlined in the Policy Notice listed below.

- Speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads (100/20 Mbps).
- Latency less than or equal to 100 milliseconds.
- Easy scalability to support advanced wireless services and future applications.

HarvestBeam successfully won tentative BEAD awards based on the evidence provided to qualify as a Priority Broadband Project in three of the five North Carolina counties where it submitted bids: Richmond, Moore and Craven Counties.

NCDIT confirmed in an email to HarvestBeam on August 29th that its submissions for Cherokee and Catawba counties were complete but did not qualify as Priority Broadband Projects and therefore did not qualify. HarvestBeam seeks further information from NCDIT regarding its technical/engineering evaluation of HarvestBeam's evidence file that was submitted for its proposed BEAD bids in all five counties as the data in the evidence file for each county was the exact same.

Furthermore, HarvestBeam was given no notice from NCDIT about any potential concerns with the evidence files submitted for its bids in Cherokee and Catawba counties, nor was it given any opportunity to correct any technical misunderstandings of the engineering vendors reviewing our applications.

If HarvestBeam was provided the opportunity to cure any technical questions from the engineering reviewing team, its bids for Cherokee and Catawba counties would have allowed it

to bring priority-tier connectivity to more locations for less overall cost and cost per passings in both counties than the awardees who were selected, which are two critical goals of the program.

Therefore, HarvestBeam respectfully requests clarification on why NCDIT determined that the evidence documentation submitted by HarvestBeam for its Priority Project bids were evaluated differently between the counties where it won BEAD (Craven, Moore and Richmond) and the counties where it was not scored as Priority Broadband Projects (Cherokee, Catawba) even though the evidence files included the exact same data for all five counties.

HarvestBeam also requests an opportunity to cure any misunderstandings about the evidence files submitted for its bids for Cherokee and Catawba counties, should there be any misunderstandings, to deliver high-capacity priority level broadband services at less cost on a per project basis.



September 4, 2025

North Carolina Department of Information Technology (NCDIT)

Re: Space Exploration Technologies Corp. (SpaceX) Comments on North Carolina Final Proposal

NCDIT:

SpaceX highlights the following in North Carolina's proposal:

| | % Households | % Program Budget | Total Spend | Weighted-Average Per-Location Price |
|--|--------------|------------------|---------------|--|
| Low-Earth Orbit Satellite Providers | 30.19% | 4.49% | \$18,345,600 | Low-Earth Orbit Satellite Providers |
| All Other Technologies Providers | 69.81% | 95.51% | \$390,165,576 | All Other Technologies Providers |
| Awards > 10 Times the Cost of the Lowest Offer | 37.66% | 75.27% | \$307,473,223 | Awards > 10 Times the Cost of the Lowest Offer |
| Awards > \$10,000 Per Location | 4.76% | 13.26% | \$54,182,116 | Awards > \$10,000 Per Location |

Based on the average per-location price for each provider.

North Carolina proposes to spend \$54.1 million dollars to serve 4,432 locations at over \$10,000 per location. SpaceX offered to serve these same locations for \$6.6 million dollars.

NTIA should review North Carolina's proposal, reject unnecessary spending, and require North Carolina to recompet these locations to achieve the Benefit of the Bargain and bring internet to those who need it in months, not years.

[REDACTED]

To:

[REDACTED]

[BEAD](#)

Subject:

[External] BEAD Comments

Date:

Friday, September 5, 2025 9:20:24 AM

[REDACTED]

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

[REDACTED]

These grants need to be made available to all forms of Broadband, including Wireless. Not every community can get fiber economically.

[REDACTED]

To: [REDACTED]

Subject: [BEAD](#)

Date:

[External] Broadband

Saturday, August 30, 2025 12:06:49 PM

[REDACTED]

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

I am a homeowner with the Bynum Ridge Landowners Association. I support bring broadband to Chatham County with Brightspeed.

[REDACTED]

To: [REDACTED]
Subject: [External] Comments for NC BEAD draft Final Proposal
Date: Wednesday, September 3, 2025 2:36:09 PM

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

First accept my apologies for the last minute comments for the NC BEAD Final Proposal Due to the late notice regarding comments, our residents in Western NC greatly appreciate the work that has gone into this effort.

[REDACTED]
[REDACTED]
Four Square Community Action Inc.
P.O. Box 2290
Andrews, NC 28901

[REDACTED]
[REDACTED]
<http://www.foursquarecommunityactioninc.com/>

We are a public entity non-profit serving the four westernmost counties of NC, (Cherokee, Clay, Graham, and Swain).

My comments are primarily focused on – Unservd and Underserved Locations

7.1 – Unservd and Underserved Locations (Requirement 7) Coverage of Unservd Locations 7.1 Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2)

Comment: What are the criteria, other than technology measures, that are being considered to ensure that unserved and underserved locations are prioritized? I recommend that the conditions for the “unserved and underserved” populations in WNC counties should factor and be prioritized based on emergency services, health/ safety, and law enforcement needs. Is this being factored?

-
Thank you,

-
[REDACTED]
[REDACTED]
Four Square Community Action Inc.
P.O. Box 2290

Andrews, NC 28901

[REDACTED]

[REDACTED]

[REDACTED]

<http://www.foursquarecommunityactioninc.com/>

To: [REDACTED]
Subject: [BEAD](#)
Date: [External] CWA District 3 comment on NC BEAD funding
Monday, September 8, 2025 9:33:15 AM

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

North Carolina State Broadband Office,

Thank you for all you have done on behalf of our state to navigate the BEAD program through recent significant changes. I greatly appreciate your skills, service, and commitment to getting North Carolina connected to internet service that will meet the evolving needs of our state.

I strongly support North Carolina fully leveraging the discretion in the latest BEAD guidance to ensure that satellite and fixed wireless technologies are only used where they can appropriately and adequately meet the needs of the state and the explicit requirements under the law.

You still have the choice: will money go to future-proof fiber or unsustainable satellite and wireless?

Despite the pressure to reduce costs and leave rural areas with wireless or satellite, states can still make a strong case for selecting fiber in most areas – and North Carolina should follow the lead of states like Louisiana, Virginia, West Virginia, and Maine, who have achieved fiber percentages above 80% of total locations by carefully evaluating the technology used to serve a particular area and determining whether it meets the needs of the community and adheres to the statutory definition of “priority broadband service.” The statute requires that priority broadband projects must “easily scale speeds over time to meet the evolving connectivity needs of households and businesses; and support the deployment of 5G, successor wireless technologies, and other advanced services,” in addition to meeting minimum speed and latency requirements.

Don’t waste federal dollars on short term fixes. Fixed wireless is not a good investment for most of rural America.

An engineering analysis of fixed wireless technologies by consulting firm CTC Technology and Energy concluded that “fiber represents the most fiscally prudent expenditure of public funds in most circumstances because of its longevity and technical advantages” (*CTC Technology, “Fixed Wireless Technologies and Their Suitability for Broadband Delivery”*,

51, June 2022) CTC's cost analysis of fiber and fixed wireless deployments finds that while fiber's upfront capital costs are higher than those of fixed wireless in many circumstances, the total cost of ownership over 30 years is comparable for fiber and fixed wireless, and fiber provides much higher quality service. The CTC analysis further finds that while fixed wireless technologies will continue to improve, they will not match the performance of fiber optic networks because:

- Fixed wireless network coverage is adversely affected by line-of-sight obstructions (including buildings and seasonal foliage) and weather.
- Unlike a fiber network, fixed wireless networks have scalability challenges due to limited availability of spectrum, the need for frequent technology upgrades, and the need to install additional antennas at both customer premises and base stations. An estimated 40 to 80 percent of a fixed wireless network's capital investment needs to be replaced every five years.
- The fastest fixed wireless technologies (such as those that use millimeter-wave spectrum) are largely unsuitable for serving rural communities because of the typical geographic dispersion of addresses and the lack of mounting structures (such as towers or building rooftops).

Subsidizing broadband via satellite is not a good use of public funds – and it's already available!

BEAD funds were meant to build next generation *infrastructure* in areas that are currently unserved. Funds that are allocated to satellites would not build any infrastructure - instead temporarily paying for an expensive service which these areas can *already* access. Furthermore, satellite is bidding on far more areas than it can actually serve: satellite internet service is, by design, capacity-constrained and subject to other physical limitations relative to wired service (*Broadband Breakfast*, "SpaceX wants Louisiana's BEAD Plan reversed," August 18, 2025, "SpaceX: NTIA Should Reject Virginia's BEAD Plan," August 14, 2025).

- Topographical Limits: Buildings, trees, clouds and poles can interrupt connections between homes and Starlink satellites (*Starlink Website*: <https://www.starlink.com/support/article/bcbf0078-be81-d345-4bce-ebbcfa196f56>.) Internet delivered over fiber optic lines, cable TV wires or mobile networks can handle far more internet usage at lower costs, even in most rural areas (*Benton Institute*, "Fixed Wireless Technologies and Their Suitability for Broadband Delivery," June 10, 2025).
- Capacity Constraints: When many people in one area use a satellite service, internet speeds slow significantly (*ArsTechnica*, "Starlink is getting a lot slower as more people use it, speed tests show," September 23, 2022). Satellite has an extremely large footprint for service, but it is not currently equipped to provide

service to more than a small percentage of the potential subscribers in that footprint (Sascha Meinrath, et al, "Starlink Capacity Analysis v0.2," July 18, 2025:

[https://thexlab.org/wp-](https://thexlab.org/wp-content/uploads/2025/07/Starlink_Analysis_Working_Paper_v0.2-1.pdf)

[content/uploads/2025/07/Starlink_Analysis_Working_Paper_v0.2-1.pdf](https://thexlab.org/wp-content/uploads/2025/07/Starlink_Analysis_Working_Paper_v0.2-1.pdf)).

Inability to Meet BEAD Requirements at Scale: As of June 2025, only 17% of U.S. speed test users with Starlink can get 100/20 service (Ookla,

<https://www.ookla.com/articles/starlink-us-performance-2025>). All BEAD-supported projects are required – by statute and NTIA's guidance – to deliver speeds of 100 Mbps download/20 Mbps upload to every subscriber in the project area.

In Unity We Stand,

[REDACTED]

[REDACTED] CWA Local 3681

[REDACTED]



To: [REDACTED] [BEAD](#)
Subject: [REDACTED]
Date: [External] Draft BEAD Program Final Proposal Draft - Public Comment
Wednesday, September 3, 2025 3:35:50 PM
Attachments: [image001.jpg](#)
[image002.png](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Good afternoon,

Please see below public comment regarding the draft BEAD Program Final Proposal:

- [REDACTED]
 - [REDACTED]
- Commenter's organization
 - **ERC Broadband, LLC**
- Is the organization a public entity? (Yes/No)
 - **No**
- Which Final Proposal section or attachment does this comment address? (e.g., Section 6.1)
 - **Section 1.2**
- Comment:

Please see the attached image, represented as follows:

- Light Blue - Previously awarded Henderson CAB locations to ERC Broadband.
- Green - BEAD locations bid by ERC.
- Yellow and (95% of) Green - BEAD locations awarded to Spectrum and AT&T.

A map of a city? ? AI-generated content may be incorrect.

We note that the proposed BEAD awards cause duplication of infrastructure development (construction) by multiple companies in the Blue-to-Green areas. Additionally, the opportunity for infrastructure damage to newly-placed fiber along these small rural roads is increased significantly by construction of multiple disparate providers. To avoid service disruption in our community, we request that the Green locations, bid by ERC, be re-considered for BEAD award.

Moreover, the AT&T locations awarded are priced at a higher rate per-address than was bid by ERC Broadband. In the alternative to reconsidering all locations that require passing through existing CAB awarded areas, we request that you reconsider those AT&T locations for which the State will pay a higher amount to AT&T than was proposed by ERC.

Thank you,

[REDACTED]
[REDACTED]

ERC Broadband LLC



[Redacted text]

[REDACTED]
To:

[REDACTED]
[BEAD](#)

Subject:

[External] Highspeed Internet from Brightspeed for Bynum Ridge Community

Date:

Sunday, August 31, 2025 12:09:26 PM

[REDACTED]

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

[REDACTED]

Bynum Ridge Landowners Association

We are a public entity and are in support of highspeed internet from Brightspeed for our community.

[REDACTED]

[REDACTED]
To:

[REDACTED]
[BEAD](#)

Subject:

[External] in support of proposal

Date:

Tuesday, September 2, 2025 5:12:14 PM

[REDACTED]

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Greetings,

I am [REDACTED], a concerned citizen, a member of Bynum Ridge Landowners Association, and am in favor of the Bright Speed Fiber bid for Chatham County proposal.

Thank You,

Sincerely ,

[REDACTED]

To: [REDACTED]
Subject: [BEAD](#)
Date: [External] Locations in Gates County left off of BEAD
Wednesday, September 3, 2025 9:15:24 AM

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To The Broadband Bead review group:

The following locations were omitted from the BEAD Program in Gates County. All of the listed locations were added to the list for funding in the original request for location by the Gates County.

- #1 All 6 locations on Will Ln. Gates NC 27937. These are residential locations that Gates County requested. On the NCDIT award may you show this as Lang Ln off of Cotton Gin RD
- #2 This location is the last one on WILL LN . The location is the Cates County Wast Water treatment plant that needs fiber to run the plant. This was on the BEAD request list.
- #3. This location is on Silver Springs Rd Sunbury NC 27979; the address range is 575 to 588. All of the locations were on the list from Gates County.

Please review the above and add them to the BEAD program. FYBE has been awarded (4) locations on Cotton Gin Rd, so it will be easy to serve Will Ln.

The locations on Silver Springs are less than a mile from the end of the FYBE fiber at this time.

Thank You,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

To: [REDACTED]
Subject: [REDACTED] BEAD
Date: [External] Missing Locations for Gates County
Wednesday, September 3, 2025 10:04:20 AM
Attachments: [image001.png](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

- Commenter's name: [REDACTED]
- Commenter's organization: Gates County Local Government
- Is the organization a public entity? (Yes/No) Yes
- Which Final Proposal section or attachment does this comment address? (e.g., Section 6.1) BEAD
- Comment: Will Ln off Cotton Gin Rd. in Gates County has still not been covered. We need this location for the Gates County wastewater treatment facility. Second, the remainder of Lawrence Ln. still needs coverage, it stops before it reaches the end of the road.



[REDACTED]

To:

[REDACTED]

[BEAD](#)

Subject:

[External] Support for Bright Speed broadband internet service for Chatham County

Date:

Wednesday, September 3, 2025 11:38:55 PM

[REDACTED]

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To whom it may concern,

We would like to submit the following comments in support of obtaining broadband Bright Speed internet service for Chatham County.

[REDACTED]

Organization: Residents of the Bynum Ridge Development, Chatham County, NC and members of the BynumRidge Landowners Association

Public Entity: No

Final Proposal Section: Bright Speed Fiber bid for Chatham County

We strongly support the proposal to provide Bright Speed broadband internet service to our community. Currently, we are on DSL for internet and its speed and reliability are problematic for us and others in our community. We need high speed, reliable internet connections in our community and we very much hope this proposal will help us attain this valued service.

Thank you,

[REDACTED]

To: [REDACTED]

Subject: [REDACTED]

Date: [External] Support for Bright Speed Final Proposal in Chatham County
Friday, August 29, 2025 4:56:46 PM

[REDACTED]

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Commenter's Name: [REDACTED]

Commenter's organization: Bynum Ridge Subdivison

Public entity: No

Final Proposal: Bright Speed Final Proposal for Chatham County

[REDACTED]

My community is among the "unserved" areas for broad band internet service. We so desire fiber internet. Broad Band internet is available on all sides of our community, still we have none. Please approve our community and location. I support the Bright Speed Final Proposal for Chatham County.

To: [REDACTED]

From: [REDACTED]

Subject:

[External] Support for Brightspeed Broadband in Chatham County

Date:

Saturday, August 30, 2025 11:22:49 AM

[REDACTED]

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[REDACTED]

Bynum Ridge Landowners Association

Thank you

[REDACTED]
To:

[REDACTED]
[BEAD](#)

Subject:

[External] Support for Chatham County BrightSpeed broadband proposal

Date:

Saturday, August 30, 2025 7:50:40 PM

[REDACTED]

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I am writing to support the inclusion of households in the Bynum Ridge Development in Chatham County in the BEAD awards to BrightSpeed.

[REDACTED]

Bynum Ridge Landowners Assn.
HOA for Bynum Ridge Development

[REDACTED]

To:

[REDACTED]

[BEAD](#)

Subject:

[External] Supporting Broadband Internet Service for Chatham County

Date:

Saturday, August 30, 2025 12:49:09 PM

[REDACTED]

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Thank you for allowing us to comment on this proposal. My family and I are very excited to be considered as one of homes receiving the broadband service through the Bead Grant. For many years we've had to endure the unreliable service that we presently have with DSL. I telework from my home and the slow internet speed of 3 is a daily challenge in performing my job with the best customer service as possible. [REDACTED]

[REDACTED]

Our subdivision is called Bynum Ridge Land Association,

Thank you again for your consideration,

[REDACTED]