

STATE OF NORTH CAROLINA

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

DRAFT AUGUST 2025

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

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## 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.<sup>1</sup> 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](mailto:FWA@doa.nc.gov) or [FWA@osbm.nc.gov](mailto: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](http://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](mailto: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.<sup>1</sup>

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.

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<sup>1</sup> 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](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](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).