Oklahoma BEAD Grant Program

Final Proposal

OKLAHOMA
Broadband Office

Introduction

The Oklahoma Broadband Office is honored to present this Final Proposal for the Broadband Equity, Access, and Deployment (BEAD) Program. This milestone represents not only the dedication of our team but also the collective efforts of leaders, partners, and communities across our state who share a vision of ensuring every Oklahoman has access to affordable, reliable, high-speed internet.

We extend our deepest gratitude to Governor J. Kevin Stitt, Speaker of the House Kyle Hilbert, and Senate Pro Tempore Lonnie Paxton for their steadfast leadership and continued support of broadband expansion as a cornerstone of Oklahoma's growth and competitiveness.

We also thank the National Telecommunications and Information Administration (NTIA) and Oklahoma's Federal Program Officer for their guidance, partnership, and commitment to ensuring a fair and effective process that empowers states to bridge the digital divide.

This proposal would not have been possible without the active engagement of our Broadband Governing Board, Internet Service Providers, vendors, and countless community members who contributed valuable insights, participated in outreach efforts, and shared their experiences. Their voices and perspectives have shaped a proposal that reflects both the challenges and opportunities present in communities across Oklahoma.

FINAL PROPOSAL DATA SUBMISSION

0.1 Attachment (Required): Complete and submit the <u>Subgrantees</u> CSV file (named *"fp_subgrantees.csv")* using the NTIA template provided.

See attachment here: <u>BEAD</u>

0.2 Attachment (Required): Complete and submit the <u>Deployment Projects</u> CSV file (named *"fp_deployment_projects.csv")* using the NTIA template provided.

See attachment here: <u>BEAD</u>

0.3 Attachment (Required): Complete and submit the <u>Locations</u> 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 here: <u>BEAD</u>

0.4 Attachment (Required): Complete and submit the No BEAD Locations CSV file (named *"fp_no_BEAO_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 here: BEAD

0.5 Question (YIN): 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 here: BEAD

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.

Timelines

Prior to opening the first Subgrantee Selection Process, the Oklahoma Broadband Office opened Pre-registration which launched January 21, 2025. During that time, the office received 43 different preregistration applications. Of the initial 43 applications, 42 were approved as one applicant withdrew.

Phases

Oklahoma's initial subgrantee selection is organized into multiple candidate pool rounds. Rounds I through IV are structured around key programmatic priorities, including a strong preference for end-to-end fiber-optic builds and the targeting of high-density unserved areas. A final round was reserved for closing remaining coverage gaps, with flexible criteria to ensure no location is left behind however, this round was not executed.

The Oklahoma Broadband Office (OBO) conducted its initial Subgrantee Selection Process on April 17, 2025, and closed May 22, 2025. During this subgrantee process, the OBO followed it's approved Initial Proposal Volume II, as allowed by NTIA. The OBO utilized its 4 candidate pools in order to prioritize the preferences of NTIA at the time. During the initial Subgrantee Selection Process, the OBO received 583 applications from 36 Internet Service Providers.

Upon the release of the June 6, 2025 NTIA Policy Notice, the OBO determined that it was best to reopen the application process, allowing past applicants to "opt out" if they do not wish to have their original application(s) moved forward to the updated process. On July 14, 2025, the OBO reopened both it's Subgrantee Selection Process ("Benefit of the Bargain") as well as the preregistration allowing additional applicants and applications to be considered for the BEAD program in Oklahoma.

The Benefit of the Bargain closed on July 23, 2025 at 11:59pm with 398 applications submitted. The OBO begun its review on July 28, 2025 and discovered that several applications had not uploaded the required documentation such as the budget schedule, project timeline, tribal resolution of consent if applicable, and other required documentation. The OBO then reopened all applications for all applicants so that additional documentation could be uploaded. This window was open for 24 hours closed at 11:59pm on July 29, 2025. The Benefit of the Bargain Round was open to all applicants including those who were preregistered.

Project Area Definitions

The OBO deployed the use of Network Expansion Territories (NETs) which are carefully

defined geographic zones created through geospatial clustering of unserved and underserved Broadband Serviceable Locations (BSLs). This structure allows for efficient infrastructure design, minimizes service overlap, and supports competitive bidding by segmenting the state into manageable, contiguous service areas. Additionally, it also allows for better tracking and negotiation to be conducted by the OBO should such negotiation be required.

The process of developing the NETS began with a comprehensive geospatial planning phase that integrated NTIA's BSL Fabric, state broadband availability data, and localized input to identify target areas most in need of service. This was followed by a formal Request for Information (RFI) period, during which the OBO solicited feedback from internet service providers, local and tribal governments, and community organizations to validate NET financial viability, technical viability, and surface additional needs. Upon conclusion of the feedback phase, NETs were finalized and published alongside maps and initial service eligibility data prior to the release of the Version 6 fabric data. The OBO also revised the CAI list based on the June 6th Policy Notice removing daycares, prisons and the like.

Evaluation Procedures and Strategies

Scoring Methodology

The OBO utilized the updated scoring criteria as described in the June 6th Policy Notice. The scoring criteria was used as follows:

Primary Scoring Criteria

- Minimal BEAD Outlay- the total cost to the BEAD program on a per broadband serviceable location cost. Applicants could receive a score of up 65 points.

Secondary Scoring Criteria

- Speed to Deployment- the amount of time it would take the internet service provider to have service to end customers. Applicants could receive a score of up to 8 points.

- Speed of Network- the speeds expected by the end of deployment. Applicants could receive a score of up to 100 points.

The OBO reviewed applications using the primary scoring criteria of cost. Cost was the sole criteria scored unless multiple applications were within fifteen percent (15%) of each other in cost. In those cases, the OBO applied the secondary criteria in accordance with the BEAD NOFO and the Restructuring Policy Notice (RPN).

To support a consistent and objective evaluation process, the OBO utilized an automated scoring tool developed and operated by Ready, the vendor managing the subgrantee application portal. The tool was designed in collaboration with OBO staff to reflect the BEAD program requirements, the updated Policy Notice, and the revised Primer posted to the OBO website prior to the scoring period.

The automated tool performed a first-level review of applications to confirm baseline compliance. Specifically, it evaluated:

- Network speed commitments (minimum 100 Mbps download / 20 Mbps upload);

- Latency less than or equal to 100 milliseconds;

- Applicant certifications regarding scalability of the network to higher speeds over time;

- Documentation of readiness to support successor technologies, including 5G and advanced wireless services;

- Alignment with other programmatic requirements, such as project eligibility and service area definitions.

Results from the automated review were provided to OBO staff as structured scoring outputs, ensuring that each application began with a standardized baseline assessment.

Following this automated review, each application was evaluated manually by at least two independent groups of OBO staff in addition to technical review completed by the Oklahoma Department of Transportation's Broadband Engineering Division. These scoring teams reviewed narrative responses, engineering documentation, and other supporting materials to validate and supplement the automated results. Applicant names and identifying information were withheld during this process to prevent bias.

Oversight of the scoring process was maintained through multiple layers. First, OBO staff cross-checked scoring team outputs to ensure accuracy and consistency. Second, Ready provided administrative reporting to confirm that the automated tool operated in accordance with the established scoring rubric. Finally, OBO leadership reviewed scoring summaries to verify that determinations were consistent with federal definitions of Priority Broadband Projects and program requirements.

This combination of automated validation and manual review ensured that applications were evaluated consistently, that compliance with technical requirements was verified, and that objectivity was preserved throughout the selection process.

Tribal Consent Review

The OBO also reviewed tribal consent documentation at this time. Tribal consent documentation was reviewed and prioritized on a good, better, best scale.

- Good: The applicant reached out to the tribal entity, but no response was received.

- Better: The applicant received written confirmation of consent, but official documentation had not been obtained at the time of application.

- Best: The applicant received official documentation on tribal letterhead, signed by the appropriate tribal leader, providing consent to the internet service provider.

Tribal Negotiation Round

Oklahoma's consultant, Ready.net, delivered finalized data on August 15th. Anticipating these results, Director Sanders convened the CSO, Chief of Staff, Grants, and Communications teams to finalize an outreach strategy. The agreed plan was to provide immediate notice to Tribal entities through direct calls and emails. To support this effort, the Communications team prepared a consolidated list of Tribal Sovereigns, THPOs, and Realty departments, integrating prior permitting contacts to ensure complete coverage.

On the evening of August 15th, OBO prepared and distributed an introductory email to roughly 100 Tribal contacts. That same day, General Counsel began making direct phone calls, completing approximately 50 introductions into the evening. These calls requested Tribal review of the email and scheduling of meetings. By the end of this initial outreach, nine Tribes agreed to meet: the Chickasaw Nation, Choctaw Nation, Osage Nation, Cherokee Nation, Cheyenne and Arapaho Tribes, Otoe-Missouria Tribe, Ponca Tribe, Muscogee (Creek) Nation, and Kiowa Tribe. Additional

Tribes expressed willingness to participate but were unable to meet on such short notice.

During each call, General Counsel clearly communicated two key points: (1) any locations not receiving Tribal consent would not be awarded BEAD funding, and (2) project costs exceeding $20,000 per pass would be ineligible for NTIA approval. Tribes were provided a firm deadline of 5:00 p.m. on August 20th to submit determinations so OBO could transmit finalized projects to the consultant for mapping and prepare SAC meeting materials for submission to NTIA.

Since that time, OBO has continued outreach, making at least three contact attempts (via email and phone) to each Tribal entity. Several Tribes are still finalizing ISP selections but have indicated plans to consent. To date, only two entities have declined consent, and those affected locations have been reassigned to the "No BEAD" list. Remaining locations are proceeding toward award despite pending provider determinations.

OBO remains committed to maintaining strong government-to-government relationships, supporting Tribes in communications and negotiations with ISPs, and ensuring all Tribal entities have the information and resources needed to make informed decisions. Continued collaboration with Tribal partners is central to the success of Oklahoma's BEAD program. Accordingly, OBO will not remove locations where Tribes have requested additional time for review and will include those locations on the list of awarded projects.

Technical Review

The OBO partnered with the Oklahoma Department of Transportation to review the technical viability of the applications. ODOT has a broadband department with several certified professional engineers, which reviewed each BEAD application. The following questions were utilized in order to determine technical viability:

- Does the application describe the selection of technology and particular hardware configurations in both backbone and last-mile segments that supports

subgrantee applicant's speed claim.

- Does the application describe the assumptions and/or calculations around capacity oversubscription limitations imposed by terrain and geographic constraints to definitively demonstrate the connection speed and network capacity requirements can be met.

- Does the application describe how the proposed infrastructure will be scalable in terms of incremental capacity meaning the proposed network can scale by adding such capacity in a cost effective manner as new customers are added.

- Does the application describe how incremental capacity will be added in a cost-effective manner during the useful life of the network.

- Does the application describe how the proposed infrastructure will be scalable in terms of future capacity, meaning the proposed network can meet future speed and performance needs?

- Does the application describe the targeted performance levels and technical approach to network for upgrades and replacements as well as projected capital costs for such upgrades in the backbone and last-mile segments.

- Upload a technical narrative as a PDF detailing: Does the applicant show how the proposed infrastructure will deliver service that reliably meets or exceeds the program required speeds and latency for all proposed BSLs and CAIs in the project area as outlined in the BEAD NOFO pp. 64-65.

Curing Process

The OBO emailed and called all applicants   when the OBO received curing from NTIA that required potential awardee information and details to be updated. The OBO reopened the

application portal and the sections that required curing from the potential subgrantee. At that time, a portal message was triggered and sent to all applicant users who submitted the original application. Applicants were able to submit questions, comments or concerns to the OBO utilizing the bead@broadband.ok.gov email. When questions were received, the OBO would answer those through a public FAQ methodology, so all applicants had access to the same information at the same time. For technical issues, applicants emailed the OBO's portal vendor directly for assistance. The OBO applicants had to respond by 9 am Friday September 12, 2025 with curing within the application portal.

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.

Fair, Open, and Competitive Process

The Oklahoma Broadband Office (OBO) implemented a comprehensive set of safeguards and internal controls to ensure that the Subgrantee Selection Process for the BEAD program was conducted in a manner that was fair, open, and competitive. These safeguards were designed not only to comply with state procurement policies and the requirements outlined in the BEAD Initial Proposal, as modified by the BEAD Restructuring Policy Notice, but also to foster public confidence in the integrity and transparency of the selection process.

Safeguards Against Collusion, Bias, and Conflicts of Interest

To prevent collusion and undue influence, the OBO enforced a strict communications "blackout" period during all active competitive processes. During this time, OBO staff did not accept calls, emails, or direct outreach from Internet Service Providers (ISPs) or the public. Instead, all inquiries were centralized through a designated public email address (BEAD@broadband.ok.gov). Responses were provided exclusively through a Frequently Asked Questions (FAQ) document posted and regularly updated on the OBO's website. This ensured that all potential applicants received the same information simultaneously, preventing favoritism or unequal access to information.

All reviewers, staff, and Governing Board members involved in the process were required to submit written conflict-of-interest disclosures prior to participating in any reviews or discussion of application materials. Any individual with an identified conflict recused from the BEAD process. This process extended not only to OBO staff but also to the Oklahoma Broadband Governing Board and external reviewers. By requiring multiple layers of conflict disclosures, OBO safeguarded against both actual and perceived conflicts of interest.

Transparency and Public Notice
To maintain openness, OBO provided broad public notice of funding opportunities through its official website and other public communication channels. All eligible applicants defined in the Initial Proposal and NTIA's June 6th Policy Notice were permitted to participate, and application windows were designed to provide a reasonable timeframe to submit materials without imposing undue burdens. Extensions were not granted, ensuring fairness while preserving the integrity of deadlines.

OBO also published a "Benefit of the Bargain Round Primer" that outlined changes to

scoring criteria, clarified programmatic requirements following the June 6th Policy Notice, and provided updated lists of Broadband Serviceable Locations and Community Anchor Institutions. By issuing this primer in advance, OBO ensured that all applicants had equal access to updated rules, expectations, and evaluation metrics prior to application submission.

Competitive Neutrality and Evaluation

To preserve competitiveness, OBO utilized a scoring methodology that was neutral with respect to provider type and scale, ensuring that all eligible entities, whether large or small, wireline or wireless, could submit competitive applications. The scoring criteria was published in advance, applied consistently across applicants, and implemented through a multi-layered review process that combined automation and human oversight.

Applications were processed through an automated scoring tool developed by Ready.net. The automated scoring system applied evaluation criteria uniformly across all applicants, eliminating the potential for arbitrary scoring decisions. Following this step, two independent scoring teams within OBO validated and confirmed the results. Only designated scorers, all of whom had completed conflict-of-interest forms, had access to applications during this stage.

Applications also underwent a technical review conducted by the Engineering Division of the Oklahoma Department of Transportation (ODOT). These engineers, who were not affiliated with OBO or any potential applicant, provided independent evaluations of proposed network designs and technical feasibility. This separation further reduced risk of bias and improved objectivity.

Reviewer Training and Oversight

OBO placed significant emphasis on ensuring that all reviewers were properly trained, qualified, and objective. Training materials included instructions on consistent application of scoring rubrics, proper documentation of review findings, and mandatory reporting of conflicts of interest. Reviewers were instructed to provide check and double-check scoring decisions, creating an auditable record that facilitated both transparency and accountability.

To ensure quality and oversight, OBO employed a layered review process. Applications were reviewed by both technical experts (for engineering feasibility) and programmatic scorers (for policy and compliance criteria). Where necessary, reviewers with specialized expertise (such as professional engineers) evaluated components requiring technical judgment. Review oversight mechanisms included internal cross-checks, supervisory reviews, and final approval by the Oklahoma Broadband Governing Board.

Conclusion

Through these measures, strict conflict safeguards, centralized public communications, pre-publication of evaluation criteria, reliance on independent technical experts, automated scoring confirmation, reviewer training, and multi-layered oversight, the OBO ensured that the BEAD Subgrantee Selection Process was fair, open, and competitive. These steps collectively mitigate the possible risks of collusion, bias, conflicts of interest, arbitrary decision-making, and any action that could undermine confidence in the process.

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.

Yes.

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.

The Oklahoma Broadband Office (OBO) posted an originally approved list of Community Anchor Institutions (CAIs) that included schools, libraries, local, state, federal or Tribal government buildings, health care centers, public safety buildings, public housing organizations, community support organizations, and prisons or correctional facilities. These eligible Community Anchor Institutions were included in the OBO's approved list of post challenge locations. The total approved CAIs amounted to 9,139 locations. After the June 6th, 2025 Policy Notice was published, the OBO revised its list of CAIs to align with the definition used in IIJA. As instructed in the Policy Notice, childcare centers, prisons and correctional facilities were removed from eligibility. The OBO worked to ensure that locations that benefit communities most had potential improved service available while still strongly and unwaveringly adhering to the IIJA and NTIA definitions of a Community Anchor Institution. Once the updated list was identified, Oklahoma has 7,940 locations that it will consider as a CAI for potential funding opportunities.

1.5 Question (YIN): 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.

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 Eligible Entity's 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.

The OBO affirms that it will ensure that each BEAD subgrantee will begin to provide services to customers that desire broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant. This requirement is not only in the application process, but also in the grant agreement for awarded projects and the OBO shall monitor this requirement based on the compliance and reporting obligations outlined in the OBO Monitoring Plan (hereafter, "the monitoring plan").

The OBO affirms that it will ensure that all BEAD-funded subgrant activities are completed at least 120 days prior to the end of the OBO's period of performance. The OBO will enforce this requirement with provisions of the grant agreement that require all subawards be completed no later than 120 days prior to the end of the OBO's BEAD period of performance. In addition, each subaward grant agreement shall have attached the project timeline with PE certification from the application to ensure each subaward is satisfying their period of performance they outlined in their application and were awarded/scored on. The monitoring plan will establish either quarterly or monthly reporting (in addition to semi-annual reporting) that are required for each project so the OBO can properly monitor each projects grant activities to ensure the subrecipient is following their project timeline and will reach substantial completion within four years of being awarded. The OBO shall establish in the monitoring plan a close out process for both subrecipients and the OBO once all subawards have reached substantial completion and properly closed out.

The OBO affirms it will ensure each subgrantee reaches key milestones in their submitted application, as outlined in their project timeline that will be used in their monitoring plan. In addition to the project timeline, the OBO will also attach to each grant agreement the project "budget template" that each applicant completed to demonstrate their planned grant expenditures, including milestones, to ensure the project will be completed on time. The OBO also affirms each subrecipient will be held to their "speed to deployment" response that was scored in their application. The OBO will enforce each subrecipient's "speed to deployment" based on the ongoing post award reporting and project tracking that is outlined in the monitoring plan. The OBO affirms it will ensure the completion of all BEAD activities within the mandated timeframes by enforcing each subrecipient's project timeline and "speed to deployment" from their application under the terms of the grant agreement and monitoring plan.

The Oklahoma Broadband Office will implement a three-phased monitoring process to ensure subgrantees successfully deploy broadband infrastructure and begin providing service within the four-year deadline. This process is designed to proactively identify and mitigate risks, ensure compliance with all program requirements, and verify that project milestones are met on schedule.

1. Pre-Award Due Diligence and Readiness Monitoring

Before any grant funds are awarded, the OBO will conduct a thorough review of each subgrantee to confirm they have the capacity and capability to execute their proposed project. This phase focuses on assessing project scope, budget, timeline, and technical feasibility based on the subgrantee's application and supporting documentation. A formal risk assessment will be performed for each project, taking into account the proposal review, the subgrantee's capacity, and their past performance.

2. Award Compliance and Performance Monitoring

Once the grant agreement is executed, the OBO will shift to ongoing monitoring of the project's compliance and performance. This phase is crucial for ensuring funds are used appropriately and projects stay on track.

The OBO will track progress against specific, measurable, achievable, relevant, and time-bound (SMART) targets outlined in each grant agreement. This will be done through a combination of desk reviews and on-site monitoring visits.

Desk Reviews: These will be the primary method for routine oversight. They include recurring project update meetings and a thorough review of subgrantee reports, such as Monthly Progress Reports (MPRs), Quarterly Financial Reports (QFRs), and Annual Performance Reports (APRs). The OBO will analyze these reports for completeness, accuracy, and consistency, comparing reported progress against approved project plans and performance targets.

On-Site Monitoring Visits: The OBO, along with its technical professionals, will conduct on-site visits to physically verify deployed infrastructure and the progress reported by the subgrantee. These visits will be more frequent for medium to high-risk subgrantees or as needed to resolve specific issues. During these visits, the OBO will also review internal records (e.g., financial ledgers, procurement files) to ensure adherence to federal regulations like 2 CFR Part 200, Subpart D. They will also perform a technical assessment of network performance to ensure the deployed network can deliver the required symmetrical speeds.

Core Performance Metrics: The OBO will regularly gather and review core performance metrics to

track each project's progress, including:

Homes Passed: Number of locations where broadband infrastructure has been deployed.

Homes Connected: Number of homes that have subscribed to service.

Fiber Miles Deployed: Total length of new fiber infrastructure installed.

Speed Tiers Achieved: Verification of the network's ability to deliver minimum symmetrical speeds.

Affordability Plan Adherence: Ensuring the subgrantee is meeting the affordability requirements set out in their proposal.

Project Completion Rate: Percentage of milestones completed on schedule.

Budget Utilization Rate: Percentage of awarded funds expended in line with the project timeline.

3. Post-Award Closeout Monitoring

Once a project has reached substantial completion, the OBO will initiate the closeout process. This final phase ensures all project deliverables are met, financial obligations are reconciled, and all closeout requirements are satisfied. The subgrantee will be required to submit a final performance report signed by a third-party licensed Oklahoma Professional Engineer (PE), along with final financial documents.

The OBO will perform a comprehensive review of all final reports, conduct a final site visit to verify completion and network functionality, and perform a final financial audit. All project documentation will then be properly archived and retained according to federal regulations. This final step ensures accountability and provides a clear record of the project's success.

OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4)

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

Yes.

4.2 Attachments: Upload the following two required documents:

(1) BEAD program monitoring plan;

(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 attachments here: BEAD

4.3 Question (YIN): 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.

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 Oklahoma Broadband Office (OBO) conducted a 7-day public comment period, from August 25th to September 1st, to allow the general public and political subdivisions the opportunity to provide feedback. The Office made the Final Proposal available for public comment through a public posting on their website and announcing the public comment period through various public channels. Comments were provided via email to BEAD@broadband.ok.gov until the publicized close date. The OBO reviewed all public comments submitted and incorporated feedback as applicable. The OBO received 71 public comments regarding its BEAD plan. While the comments outlined below are only a small portion of the comments received, they accurately depict the concerns expressed within all submitted public comments and illuminate the robust participation within the OBO's public comment period.

Public Comment: I appreciate the opportunity to review the Final Proposal for the Broadband Equity, Access, and Deployment (BEAD) Program. While I commend the Office's commitment to expanding broadband access across the state, I would like to express concern regarding the inclusion and prioritization of satellite and wireless technologies in deployment strategies.

Fiber-optic infrastructure remains the gold standard for broadband delivery. It offers unmatched stability, lower latency, and significantly higher speeds—both now and in terms of future scalability.

Unlike satellite or fixed wireless solutions, fiber is not subject to weather-related disruptions, signal degradation, or capacity limitations due to terrain or line-of-sight issues. These factors are especially critical in rural and underserved areas where reliability is paramount.

Additionally, fiber is often more cost-effective for consumers. For example, many electrical cooperatives across Oklahoma offer fiber internet plans that are not only faster but also more affordable than satellite services such as Starlink. Starlink's monthly service fee—typically around $120—exceeds the cost of fiber plans offered by providers like OEC Fiber, Lake Region Electric Cooperative, and others, which often deliver gigabit speeds for $60–$80 per month. This price disparity undermines the affordability goals outlined in the BEAD program.

While satellites may serve as a stopgap in extremely remote areas, it should not be treated as a long-term solution or prioritized over fiber deployments. I urge the Office to reconsider the weighting of technology types in its scoring and funding decisions, and to ensure that fiber remains the central focus of Oklahoma's broadband future.

Thank you for your consideration.

OBO's Response: The Oklahoma Broadband Office (OBO) recognizes and shares the perspective that fiber-optic infrastructure represents the gold standard for long-term broadband deployment due to its reliability, scalability, and performance. Since its inception, OBO has emphasized the importance of fiber in advancing the state's broadband goals.

However, under the current administration, OBO is required to administer the BEAD program in a technology-neutral manner, consistent with federal guidance and the June 6th Policy Notice. This

means that all applicants were evaluated equally, regardless of technology type. OBO could not prioritize one technology over another based on terrain or other factors but instead was required to assess applications using cost and program-defined eligibility criteria.

The June 6th Policy Notice also revised requirements for affordability by removing the federal definition of a "low-cost option." As a result, OBO can no longer establish a specific threshold for service pricing. Instead, providers must certify that they will offer a low-cost option, though the price point may vary across providers.

While OBO continues to recognize fiber as the most durable long-term solution, the administration's priority is to expand broadband access as quickly and cost-effectively as possible. This requires a technology-neutral approach that ensures all providers meeting the BEAD standards were considered on equal terms.

Public Comment: The decision to spend allocated grant funds on fixed wireless or low earth orbit service rather than on maximizing access to fiber is an egregious breach of the purpose for this entire program. Fixed wireless and low earth orbit services provide sub-standard service compared fiber. Theses services are far more likely to have issues with reliability than standard fiber services. Additionally, fiber provides more consistent upload and download speeds, which are necessary for most modern applications. As the goal of this program is to grant as many Oklahomans in rural areas and underserved locations as possible access to high-speed internet, the decision to use sub-par services like fixed wireless will only continue the tradition of critically underserving these communities.

Additionally, the fact that not all of the allocated funds are to be used only highlights how this proposal, in its current state, will fail to affect meaningful change and improvement. Those funds could and should instead be spent on the purpose for which they were intended in the first place: connecting as many Oklahomans as possible to high speed, reliable services.

OBO Response: The Oklahoma Broadband Office (OBO) acknowledges and understands the concerns expressed regarding the inclusion of fixed wireless and low-earth orbit (LEO) satellite technologies in BEAD-funded projects. We recognize that fiber-optic infrastructure provides the highest level of reliability, speed, and scalability, and we agree that fiber represents the most durable long-term solution for meeting the state's connectivity needs.

Under the prior administration, OBO's planning process reflected this priority by designating fiber as the exclusive "priority broadband project" technology. However, following the change in administration and the release of the June 6th Policy Notice, OBO was required to administer the BEAD program in a technology-neutral manner. This directive removed the ability to prioritize fiber exclusively and instead obligated OBO to evaluate all applications—whether fiber, fixed wireless, or

satellite—on an equal basis. Applications were therefore assessed using program-defined eligibility standards and cost criteria, rather than by technology type.

It is important to emphasize that the purpose of this shift is not to undervalue fiber, but to ensure that all eligible providers had the opportunity to compete fairly and that unserved and underserved Oklahomans could be reached as quickly and efficiently as possible. In extremely remote or difficult-to-reach areas, alternative technologies may provide interim or cost-effective solutions until fiber can be deployed more broadly.

With respect to funding, OBO is administering the BEAD program in accordance with NTIA requirements, which emphasize efficiency, cost savings, and maximizing the value of allocated funds. Rather than focusing on spending the full allocation, this approach ensures that projects deliver the greatest benefit to Oklahomans in a fiscally responsible and sustainable manner. By following NTIA's guidance, OBO can expand broadband access effectively while ensuring compliance with federal program standards and achieving the best possible return on investment.

While OBO continues to recognize fiber as the gold standard, the office is required to balance this preference with the federal directive to treat all technologies equally. This approach allows Oklahoma to expand service coverage more rapidly while still aligning with the long-term vision of maximizing access to reliable, high-speed fiber infrastructure wherever possible.

Public Comment: Risks of Wireless Broadband in BEAD-Funded Projects

I appreciate the opportunity to provide feedback on the Final Proposal for the Broadband Equity, Access, and Deployment (BEAD) Program. The transparency and rigor demonstrated throughout the subgrantee selection process are commendable. However, I write to express concern regarding the potential inclusion of wireless broadband technologies in deployment strategies, particularly where wired alternatives—such as fiber-to-the-premises (FTTP)—are feasible.

Wireless broadband, while expedient in certain edge cases, presents persistent challenges that undermine long-term reliability and cost-efficiency:

Environmental Vulnerability: Oklahoma's climate and geography—ranging from tornado-prone plains to ice storms—pose significant risks to wireless signal integrity. Service degradation during adverse weather events is not hypothetical; it is routine.

Spectrum Congestion: In both urban and rural areas, wireless deployments are susceptible to interference and bandwidth contention, resulting in inconsistent speeds and latency spikes.

Limited Scalability: Wireless networks often struggle to meet future bandwidth demands, especially for symmetrical gigabit service. This limitation directly conflicts with BEAD's prioritization of scalable,

future-proof infrastructure.

Strategic Advantages of Wired Broadband

Fiber-based infrastructure offers superior performance and long-term value:

Reliability: Fiber is immune to electromagnetic interference and weather-related disruptions, ensuring consistent uptime and service quality.

Cost Efficiency Over Time: Although initial capital expenditures are higher, fiber networks have lower maintenance costs, longer lifespans, and reduced operational overhead.

Scalability and Resilience: Fiber can support multi-gigabit speeds, 5G backhaul, and emerging technologies without major upgrades—aligning with both IIJA and NTIA definitions of "Priority Broadband Projects."

Alignment with BEAD Prioritization Framework

The BEAD Restructuring Policy Notice clearly prioritizes end-to-end fiber builds. Oklahoma's scoring rubric appropriately reflects this, but implementation must remain disciplined. Wireless should be reserved strictly for areas where fiber deployment is demonstrably cost-prohibitive and technically infeasible—not as a default or convenience-based solution.

Recommendations

To ensure durable broadband equity and responsible stewardship of federal funds, I respectfully recommend the following:

Require Cost-Benefit Justification: Subgrantees proposing wireless deployments should submit terrain-based feasibility studies and cost analyses demonstrating that fiber is not viable.

Prioritize Fiber in NETs: Where cost per passing is within reasonable thresholds, fiber should be the default deployment method.

Enforce Performance Benchmarks: Wireless projects must meet stringent reliability and speed metrics, with clawback provisions for non-compliance.

By anchoring Oklahoma's BEAD investments in wired infrastructure, the state can ensure that its broadband expansion efforts yield lasting dividends in access, quality, and operational resilience.

OBO Response: The Oklahoma Broadband Office (OBO) appreciates the thoughtful feedback regarding the inclusion of wireless broadband technologies in BEAD-funded projects. We share the

goal of maximizing long-term reliability, performance, and scalability in broadband infrastructure, and we recognize the strategic advantages of fiber-based deployments.

Under current federal guidance, including the June 6th BEAD Restructuring Policy Notice and NTIA program requirements, OBO is required to administer the program in a technology-neutral manner. This approach ensures that all eligible providers—whether proposing fiber, fixed wireless, or low-earth orbit solutions—are treated identically, and that funding decisions are based on program-defined eligibility criteria and cost considerations rather than technology type alone. Accordingly, while fiber remains the preferred long-term solution for high-capacity broadband, other technologies may be deployed where they provide a cost-effective and timely path to serving unserved and underserved locations.

OBO evaluates all proposed projects against performance and eligibility standards to ensure service quality and future scalability. Providers are required to certify that they will deliver reliable, high-speed broadband to covered locations, and OBO monitors compliance with these commitments.

While OBO cannot mandate fiber exclusively due to the technology-neutral directive from NTIA, the office remains committed to supporting durable, scalable, and future-ready broadband infrastructure across Oklahoma. In all cases, cost-effectiveness, compliance with program standards, and maximizing access for unserved and underserved communities guide project selection and implementation.

The OBO has published on it's public website the updated Final Proposal CSV's and documents. The Oklahoma Broadband Office (OBO) has conducted the required public comment period and does not plan to repost the Final Proposal for an additional round of public comment. At the time of the original posting, entity applications had already been scored and awardees identified. However, because Tribal Consent is required for all projects, OBO prioritized securing tribal support prior to finalizing awards. Recognizing that this process required additional time, OBO reached out directly to all outstanding Tribal Nations to obtain support or consent and ensure their support for the proposed subgrantees under the BEAD Program.

CHALLENGE PROCESS RESULTS (REQUIREMENT 6)

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

Yes.

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 Oklahoma Broadband Office published the final list of Broadband Serviceable Locations (BSLs) and Community Anchor Institutions (CAIs) on July 11, 2025 to its website here: BEAD. There was one update made to the locations prior to the BEAD Benefit of the Bargain Round opening on July 14, 2025. The update was noted on the OBO's website specifying the time that the update was made.

UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7)

7.1 **Question (YIN):** 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.

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.

7.4 **Question (YIN):** 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.

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 unreasonable 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 (YIN):** 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 Question (YIN): 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.

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.

In progress.

11.2 Question (YIN): 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 (YIN): 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.[6]

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 (YIN): 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 ensured planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

N/A.

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.

The OBO implemented both the IIJA and June 6, 2025 Policy Notice definition of a Priority Broadband Project.

The term *"Priority Broadband Project"* means a project designed to:
i. provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine; and
ii. ensure that the network built by the project can easily scale speeds over time to: (1) meet the evolving connectivity needs of households and businesses; and (2) support the deployment of 5G, successor wireless technologies, and other advanced services.

For the purposes of the BEAD application process, the Oklahoma Broadband Office (OBO) required applicants to provide documentation demonstrating the following:

- Network speeds of no less than 100 Mbps download / 20 Mbps upload;

- Latency less than or equal to 100 milliseconds, in line with the Restructuring Policy Notice (RPN);

- Documentation demonstrating scalability of the network to higher speeds as demand increases;

- Documentation of potential implementation of successor technologies, including 5G and other advanced services.

Applicants were specifically asked whether their project should be considered a *Priority Broadband Project*. If the applicant responded "yes," The Oklahoma Department of Transportation, with their internal team of broadband engineers, undertook a structured review to confirm eligibility. This review process included:

- A technical assessment of the applicant's engineering and design documentation, network diagrams, and vendor specifications to verify compliance with the 100/20 Mbps

speed and latency ≤100 ms benchmarks;

- Evaluation of scalability evidence, such as fiber capacity projections, electronics upgrade pathways, or wireless spectrum capabilities, to ensure networks could cost-effectively scale to meet future bandwidth demands;

- Verification of successor technology readiness, including applicant demonstrations of compatibility with 5G, next-generation wireless, and other advanced technologies;

- Cross-checking applicant certifications against supporting materials to confirm alignment with federal definitions of Priority Broadband Projects.

If an applicant indicated "no," the project was categorized outside of the Priority Broadband Project pool and scored using the primary and secondary criteria. However, such projects would only be considered for award if Priority Broadband Projects were determined to be of excessive cost or failed to meet the program requirements.

Ultimately, all awarded applicants certified that their projects qualify as Priority Broadband Projects, and OBO confirmed this status through its review methodology outlined above.

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.

All applications were reviewed prioritizing Priority Broadband Projects and then Non-Priority Broadband Projects as specified in the June 6th policy notice released by NTIA. The OBO utilized the Minimal BEAD Outlay as the primary scoring criterion, using the applicants requested BEAD funding amount, exclusive of the entities match amount to determine the application score. The scores are listed below:

Minimal BEAD Program Outlay	$0*-$999.99	65 - 58.5065 points
	$1,000-$1,999.99	58.5 - 52.000065 points
	$2,000-$2,999.99	52 - 45.500065 points
	$3,000-$3,999.99	45.5 - 39.000065 points
	$4,000-4,999.99	39 - 32.500065 points
	$5,000-5,999.99	32.5 - 26.000065 points
	$6,000-6,999.99	26 - 19.500065 points
	$7,000-7,999.99	19.5 - 13.000065 points
	$8,000-8,999.99	13 - 6.500065 points

	$9,000-$9,999.99	6.5 - 0.000065 points
	$10,000-$14,999.99	0 – (-32.499935) points
	$15,000 or more	-32.5 points**

Note: 1) Based on the formula: 65*($10,000 - BEAD Program Outlay per Passing)/$10,000. 2) The number $10,000 is an arbitrary scaling factor but ensures similar treatment across pools in the way that cost-effectiveness affects selection decisions. The "$0" value for Minimum BEAD Program Outlay is included in the table for completeness in elucidating the impact of the formula on applicant scores. The OBO does not expect to receive $0 offers of deployment, and would be hesitant to accept them if offered, since the lack of a grant would create legal challenges for the office to enforce a deployment commitment. The use of the formula can result in negative point values, implying the Minimal BEAD Program Outlay factor has greater weight than its 65 points would suggest. The range of variation is not from 0 to 65, but from 65 down to negative numbers with no floor.

However, it should be noted that the lowest cost project, unless within 15% of cost with competing applications, will receive BEAD funding so long as the final project combinations (ie. the entire state) are the lowest cost to the BEAD program.

For each application, the OBO reviewed materials to ensure that the application was complete. In partnership with the Oklahoma Department of Transportation, the applications were reviewed for technical and logistical viability. Upon the completion of this initial review, the OBO scored all Priority Broadband Project applications utilizing the Minimal BEAD Outlay criteria. In the case where one or more projects were requesting similar project areas (90% of locations overlapping) and the projects were within 15% of cost to the BEAD program, the OBO moved those projects into the secondary scoring criteria pool.

Those applications were then scored utilizing the following point values:

Speed to Deployment	<12 Months	8
	12.1-23 Months	5
	23.1-36 Months	2
	36.1-48 Months	0
	48+ Months	DQ
Speed of Network (Max Download)	1 Gbps+	25 points
	500+ Mbps	15 points
	300+ Mbps	10 points
	100+ Mbps	5 points
	100 Mbps	0 points

Speed of Network (Max Upload)	1 Gbps+	25 points
	500+ Mbps	15 points
	300+ Mbps	10 points
	100+ Mbps	5 points
	20 Mbps	0 points
Speed of Network (Min Download)	1 Gbps+	25 points
	500+ Mbps	15 points
	300+ Mbps	10 points
	100+ Mbps	5 points
	100 Mbps	0 points

Speed of Network (Min Upload)	1 Gbps+	25 points
	500+ Mbps	15 points
	300+ Mbps	10 points
	100+ Mbps	5 points
	20 Mbps	0 points

If there was a tied scoring utilizing the above criteria, in the case that one of the tied applicants was a previously provisional subgrantee, that applicant would receive the project area over an applicant that had not previously participated in Oklahoma's BEAD process.

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 chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at Environmental Compliance | First Responder Network Authority.

- 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 EHP Documentation Attachment Requirement 14: BEAD

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.

See Tribal Consent Attachments: BEAD

The OBO does plan to request a Waiver of Tribal Consent Deadline.

PROHIBITION ON EXCLUDING PROVIDER TYPES (REQUIREMENT 16)

16.1 Question (YIN): 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.

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.'

No waivers were requested prior to the submission of the Final Proposal.

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.