Broadband Equity, Access, and Deployment (BEAD) Program FAQs

Answers are provided for the reference of all subgrantee applicants; questions have been condensed, consolidated, and edited for clarity.

Application Phase

1. Are the maps finalized from the Challenge Process? If not, when will these be finalized? I presume we can't design projects until the location map is fully solidified, since it is subject to change.

Results from the BEAD Challenge Process have been submitted to NTIA; WBO is awaiting approval. Once NTIA approves the results, WBO will release the location map and data along with subgrantee application materials.

If WBO does not receive NTIA approval of its BEAD Challenge Process results before the planned opening of WBO's Subgrantee Application Phase, WBO will publish preliminary Broadband Serviceable Location (BSL) data seven days before the Subgrantee Application Phase begins. Then, when NTIA approves the Challenge Process results, WBO will publish a final version of the BSL data. At that point, WBO will also extend the Subgrantee Application Phase window if needed to allow subgrantee applicants enough time to complete their project designs.

2. When will WBO release benchmark pricing for each project area?

WBO will release the benchmark pricing seven days before the opening of the Subgrantee Application Phase to provide subgrantee applicants sufficient time to review and design project areas.

3. If an entity submits an application that uses a blend of fiber and fixed wireless solutions, would that application be scored as a non-priority application?

Yes. Only projects that are end-to-end fiber will be considered "Priority Broadband Projects." As defined by the BEAD Notice of Funding Opportunity (NOFO):

> "The term 'Priority Broadband Project' means a project that will provision service via end-to-end fiber-optic facilities to each end-user premises. An Eligible Entity may disqualify any project that might otherwise qualify as a Priority Broadband Project from Priority Broadband Project status, with the approval of the Assistant Secretary, on the basis that the location surpasses the Eligible Entity's Extremely High Cost Per Location Threshold… or for other valid reasons subject to approval by the Assistant Secretary."[1]

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[1] "BEAD NOFO," NTIA, https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf (at p. 14).

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For further explanation on scoring and prioritization of such projects, see Section 2.4.2 of Wyoming's Initial Proposal Volume II.[2]

4. Do we need to supply a Letter of Credit Certification during the Application Phase?
Yes. During the Application Phase, subgrantee applicants are required to provide either a letter of credit or a performance bond from their financial institution. For guidance, please see Section 2.4.11.3 of Wyoming's Initial Proposal Volume II.[3]

5. Where can I find the benchmark spreadsheet?
The Wyoming BEAD Benchmark Spreadsheet is available on the WBO BEAD webpage under "Grant Application Materials": https://broadband.wyomingbusiness.org/bead/bead-grant-application/.

6. If an area or parts of an area get funded by the USDA ReConnect Round 5 program, will those locations be made ineligible for BEAD funding?
Yes. Between now and its submittal of the Final Proposal to NTIA, WBO will publish locations served through ReConnect upon notification or certification that the grants have been completed. WBO will also review and remove locations served through Capital Projects Fund (CPF) grants under the Connect Wyoming program and any other grant-funded programs with enforceable commitments. WBO will publish locations deemed ineligible for BEAD funding as they are verified.

7. When will the maps be available? I understood that preliminary maps would be available for preview seven days before the application portal opening date.
Due to the time required to build maps based on the Project Area Units (PAU), WBO is not able to provide preliminary maps seven days before the application opening date of October 21. However, WBO plans to make maps available on October 21. In the meantime, all the data for eligible location, PAU identifier, and benchmark pricing are now available on the WBO BEAD webpage under Grant Application Materials: https://broadband.wyomingbusiness.org/bead/bead-grant-application/.

8. Are multiple applications allowed?
Yes. You can combine Project Area Units (PAU) into a single application. You can also apply for a PAU individually. For more details, please see the September 23 webinar, BEAD Grant Program Design, accessible from the WBO BEAD webpage under BEAD Grant Application Webinar Recordings: https://broadband.wyomingbusiness.org/bead/bead-webinars/.

9. Can you explain the difference between Project Area Units and Census Block Groups?
WBO's Subgrantee Application will utilize Project Area Units (PAU) as the foundational geographic unit. The PAUs are constructed to aggregate unserved and underserved locations within a Census Block Group (CBG) into smaller units. Multiple PAUs may be part of a CBG. For more details, please see the September 23 webinar, BEAD Grant Program Design, accessible from the WBO BEAD webpage under

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[2] "Initial Proposal Volume II," WBO, https://wyomingbusiness.org/wp-content/uploads/2024/08/Wyoming-BEAD-Initial-Proposal-Volume-II-Approved.pdf (at p. 45).
[3] "Initial Proposal Volume II," WBO, https://wyomingbusiness.org/wp-content/uploads/2024/08/Wyoming-BEAD-Initial-Proposal-Volume-II-Approved.pdf (at p. 69).

BEAD Grant Application Webinar Recordings: https://broadband.wyomingbusiness.org/bead/bead-webinars/.

10. The published list of locations didn't include information on the serviceability of locations. Should subgrantee applicants use the current list of Challenge Process results as a reference for serviceability of locations?
Yes, subgrantee applicants should use the latest eligible location results until WBO has received NTIA approval on the final list of eligible locations. While the current list of eligible locations has FCC IDs only, subgrantee applicants can use their Tier D license to match the needed latitude/longitude information and serviceability type from the CostQuest fabric. To access eligible location data, select Eligible Locations from the WBO BEAD webpage, accessible in the "data" section under BEAD Grant Application Materials: https://broadband.wyomingbusiness.org/bead/bead-grant-application/.

11. Why did Question 3.9 for Non-Priority or Alternative Technology subgrantee applicants change from asking if the network could reliably deliver at least 250/50 Mbps to now asking if the network can reliably deliver at least 100/20 Mbps?
The original version of Question 3.9 incorrectly referenced a speed of 250/50 Mbps. Question 3.9 has been updated to reference the BEAD baseline speed requirement for Reliable Broadband Service of 100/20 Mbps. Subgrantee applicants are required to select "Yes" or "No" from the dropdown menu.

12. What is the updated guidance for Question 3.9A for Non-Priority and Alternative Technology subgrantee applicants and why was this update made?
For Question 3.9A, subgrantee applicants are now required to include in the first sentence of their narrative response the tier of service speeds their network can reliably deliver while maintaining latency of no more than 100 ms. This additional information will help WBO score subgrantee applicants in the "speed of network and other technical capabilities" category in the Subgrantee Selection Scoring Rubric. Speed tiers and corresponding scores are listed below:

Speed tier 1	100/20 Mbps up to 500/20 Mbps	0 points
Speed tier 2	500/20 Mbps up to 1 Gbps/35 Mbps	2 points
Speed tier 3	1 Gbps/35 Mbps or higher	5 points

For a subgrantee applicant to receive these points, the state's evaluation must confirm that the proposed network design can deliver the performance level to all eligible locations within an application, including a reasonable assessment of how the proposed network can scale by adding incremental capacity in a cost-effective manner as new customers are added. For more information about scoring, download the rubric (see the "Scoring Rubric – Non-Priority" tab: https://wyomingbusiness.org/wp-content/uploads/2024/09/BEAD-Initial-Proposal_Volume-II_Subgrantee-Selection-Scoring-Rubric-Approved.xlsx).

13. Question 2.7 asks how many people we have hired for this project. Is this asking how many people we have employed who will work on the projects or is it asking how many people we have hired specifically to cover BEAD projects?

Provide an estimate of the number of people, and in what roles, you have hired or intend to hire for this project only. Do not include personal contact information (e.g., home address, personal phone number) in your response.

The response should detail the anticipated number of personnel that will be hired to carry out the project and should also detail the roles for which the personnel will be hired. If you have hired or will hire additional people to cover multiple BEAD projects, of which this project is one, you may use a percentage based on the amount of time the person will work on this project.

Upload the response to the portal as a file in PDF, Word, or Excel format. The file name must include "2-7-project-roles" to be accepted by the portal.

14. Is there a BEAD map user guide?

Yes. The BEAD Program Broadband Map User Guide, BEAD Application Map, and Map PAU Data File are all available from the WBO BEAD Application Map webpage:
https://broadband.wyomingbusiness.org/bead/bead-grant-application/bead-grant-application/.

15. There are locations in our PAUs that cannot be reached wirelessly or with fiber. Since we have to propose a solution for all locations in a PAU, the only other option will be satellite. The satellite design template requires the applicant to certify that it will meet the BEAD network requirements. Because our company does not operate our own satellite network, nor does it have resale agreements with satellite providers, we cannot attest to the performance of another provider's network. How should we navigate this scenario?

Subgrantee applicants must submit proposals that include all eligible locations within the Project Area Units (PAU) they are proposing, regardless of the difference between the proposed grant request and the PAU reference price. Subgrantee applicants must also submit proposals only for the applicable technology types (fiber, reliable broadband, or alternative technology) they can provide.

Given these requirements, WBO understands that a proposal may exceed the PAU reference price. This can be addressed in negotiations, which allows WBO to work with subgrantee applicants to alter the terms of their proposals, including but not limited to descoping of high-cost locations. For PAUs that receive no proposals during the Subgrantee Application Phase, WBO will have the option of contacting prequalified ISPs (those approved in the BEAD Prequalification Phase) for direct negotiation. Therefore, a prequalified ISP could choose not to bid on a given PAU and instead wait to see if WBO receives any proposals for the PAU. If WBO does not receive proposals for the PAU, WBO may contact that prequalified ISP for negotiation on the PAU.

16. Can you clarify the requirements for the Professional Engineer providing the project certification?

The Professional Engineer providing the project certification must be licensed, though it is not required they be licensed in Wyoming. Per the NTIA Conditional Limited Programmatic Waiver and Clarification of

Professional Engineer Certification, issued in March 2024, the Professional Engineer's license may be in any of the 56 Eligible Entities.

17. Can you clarify the requirements for the attorney providing the legal opinion?
For issues and compliance related to Wyoming law and regulations, the attorney providing the legal opinion must have an active status with no disciplinary charges pending and no public discipline imposed by the Wyoming State Bar. For issues and compliance related to federal law and regulations, the attorney providing the legal opinion must have an active state law license with no disciplinary charges pending and no public discipline imposed.

18. Are applicants required to bid on, and serve, 100 percent of unserved/underserved locations within a CBG or PAU?
WBO would like to see project applications that include all unserved and underserved locations (e.g., Broadband Serviceable Locations (BSL)) in the Project Area Unit (PAU), regardless of cost. Applications that include all BSLs are considered compliant with BEAD requirements for universal service and WBO will prioritize these for negotiation. Applications that do not include all BSLs will be accepted but considered for negotiation only if there are no compliant bids for a PAU. If you have extenuating circumstances that keep you from including all BSLs in a PAU, you may add notes on technical feasibility or limitations in the Technical Narrative.

19. Are applications going to be ranked statewide and not just for overlapping CBGs/PAUs? If so, I question the fairness of this when the maximum points from local government letters of support will be different in different parts of the state. Some CBGs have zero, one, two, or three municipalities. I also question why letters of support don't count from county governments.
WBO encourages subgrantee applicants to obtain letters of support from municipalities. Per the Initial Proposal Volume 2 requirement (IPv2, p. 62), subgrantee applicants will earn additional points based on letters of support from local and Tribal governments only and not from county governments.

Please note that unlike the Capital Project Funds program grants, WBO's BEAD program does not use a statewide ranking by which proposals with the highest scores get awarded. Because BEAD seeks to achieve universal coverage in Project Area Units (PAU) across the entire state within an overall budget, each project is evaluated in the context of the PAU it serves. A subgrantee application in a PAU is not in direct competition with applications in PAUs in other parts of the state. An applicant in a PAU that has one municipality is therefore not at a scoring disadvantage as compared to an applicant in a PAU that has two municipalities (and could therefore receive two letters of support). When two or more subgrantee applicants propose in a PAU, they each have an equal number of potential local and Tribal governments from which they can receive letters of support – and those governments can choose to provide letters of support for more than one applicant.

20. What will be the process for requesting/receiving waivers of the 25 percent matching requirements in non-extremely high cost per location threshold (EHCPLT) Census Block Groups?
WBO encourages applications that meet NTIA's match requirement, which is 25 percent for projects that do not include high-cost areas. However, NTIA has a mechanism for the State to request match waivers

in the subgrantee selection process. During negotiations, WBO will consider the match waiver as an option to best utilize the funding available to the state.

21. The scoring matrix indicates a 1 Gbps commitment for affordability; does this mean there are no points given for 100/20 and how does that align with the Initial Proposal Volume 2 that discusses the $70 as the low-cost option for 100/20? Assuming, then, that projects which may be end-to-end fiber but which may not be 1 Gbps throughout would be scored lower on the spectrum?
The question touches on two separate requirements in the state's Initial Proposal Volume 2 (IPv2):

1) Under the "Affordability" primary criteria, "all applicants must submit the price for a 1 Gbps download/1 Gbps upload internet service plan for priority projects (or 100 Mbps download/20 Mbps upload internet service plan for non-priority projects) that will be offered to all BEAD-funded BSLs within the service area after deployment is completed." (See IPv2, pp. 55-59.) Up to 15 points will be awarded for this pricing based on the scoring methodology. (See IPv2, pp. 59-60.)

2) All subgrantee applicants must provide a $70 low-cost broadband service option at 100/20 Mbps as a basic requirement to participate in the BEAD program. No points are provided for meeting this requirement. (See IPv2, pp. 130-134.)

22. Are pre-application expenses allowable? If so, is there a percentage threshold and what is that?
According to the BEAD NOFO, eligible uses of BEAD program funds are determined in accordance with cost principles identified in 2 CFR, Part 200. "Costs must be reasonable, necessary, allocable, and allowable for the proposed project or other eligible activity and conform to generally accepted accounting principles." (NOFO p. 81) The NOFO also states that funds committed to an award may only be used to cover allowable costs incurred during the period of performance, except for certain reasonable pre-award expenses, and for allowable closeout costs incurred during the grant closeout process.

Pre-award expenses are detailed in 2 CFR 200. Per §200.458: "Pre-award costs are those incurred prior to the effective date of the Federal award or subaward directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding

agency. If charged to the award, these costs must be charged to the initial budget period of the award, unless otherwise specified by the Federal awarding agency or pass-through entity."

Per the BEAD NOFO (p. 39), eligible uses of funding in connection with last-mile broadband deployment projects include the following:
1. Construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service, including infrastructure for backhaul, middle- and last-mile networks, and multi-tenant buildings.
2. Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements.
3. Deployment of internet and Wi-Fi infrastructure within an eligible multi-family residential building.
4. Engineering design, permitting, and work related to environmental, historical and cultural reviews.
5. Personnel costs, including salaries and fringe benefits for staff and consultants providing services directly connected to the implementation of the BEAD Program (such as project managers, program directors, and subject matter experts).
6. Network software upgrades, including, but not limited to, cybersecurity solutions.
7. Training for cybersecurity professionals who will be working on BEAD-funded networks.
8. Workforce development, including Registered Apprenticeships and pre-apprenticeships, and community college and/or vocational training for broadband-related occupations to support deployment, maintenance, and upgrades.

23. Do multiple PAUs in one application have to be contiguous?
No. Project Area Units (PAU) do not need to be contiguous.

24. If a company bids on multiple PAUs in a single application, if one PAU is excluded, does the entire application get discarded or just the PAUs that are not accepted?
If a subgrantee applicant bids on multiple Project Area Units (PAU) in an application, and one or more PAUs are not selected by WBO, the entire application is not discarded. For example, if an application has five PAUs and two are not selected for an award, the remaining three PAUs will still be considered by WBO. If these meet scoring and eligibility criteria, and are competitive proposals, WBO can conduct negotiations with the subgrantee applicant to serve those PAUs.

25. Do all PAUs in a CBG have to be served if only one PAU in the CBG is of interest?
An application must include at least one Project Area Unit (PAU). You do not need to submit an application for an entire Census Block Group (CBG).

26. How does WBO intend to address long drop, extremely high-cost locations? Are those handled in a descope? Should applicants identify any such locations in their applications?
WBO encourages subgrantee applicants to budget for and include all locations in a PAU (including long drop, extremely high-cost locations), because applications that propose to serve all locations will be prioritized for negotiations, which may include descoping certain locations. Applicants can identify

extremely high-cost locations in the Technical Narrative. This information will also be covered during negotiations.

27. Will an ISP be considered for a project if they put in for 80 percent coverage of locations? Must the project cover 100 percent?
As noted in FAQ 18 above, applications that address 100 percent of the Broadband Serviceable Locations (BSL) are encouraged; these applications will be considered compliant in the Application Phase and will be prioritized for negotiation. Applications that do not address 100 percent of BSLs are not disqualified but will have a lower priority for negotiation.

28. When will the Application Phase close?
The Application Phase will be open to at least January 10, 2025. If NTIA approves Wyoming's BEAD Challenge location data after November 26, 2024, then the Application Phase will extend 45 days from the date of that approval.

29. How do project-specific resumes differ from key personnel resumes? Can we use the same resumes if the key personnel will be overseeing the projects?
Resumes in the Prequalification Phase highlighted the qualities and capabilities of your organization's leadership. Resumes in the Application Phase should highlight individuals who will work on the specific project in your application. Depending on your organization's size these may or may not be the same people.

30. What should we do if we find a location that's not a BSL?
For the purposes of the application, please submit for the entire Project Area Unit. Please identify ineligible locations in the Technical Narrative portion of your application. After the Application Phase, WBO will work with NTIA to descope locations that are not eligible.

31. If we're proposing a hybrid fiber/wireless solution with speeds ranging from 1Gbps/1Gbps to 100/20 Mbps, what speed tier should we go with (Application Guide, pp. 11-12)?
The speed tier selected should represent the best tier of service the subgrantee applicant can provide to **every** BSL in the project areas.

32. You answered that WBO would like to see all locations in a Project Area Unit in the application, but is it required?
Subgrantee applicants are encouraged to include all Broadband Serviceable Locations (BSL) in their applications, regardless of the cost against the benchmark. Applications that include all BSLs are considered compliant with BEAD requirements for universal service and WBO will prioritize these for negotiation. Applications that do not include all BSLs will be accepted but considered for negotiation only if there are no compliant bids for a PAU. We encourage subgrantee applicants to submit

applications that support your organization's business case, while knowing that applications addressing 100 percent of locations will be prioritized.

33. Will attorney fees for legal opinion and professional engineer fees for project certification be allowable pre-award expenses?
Fees for the legal opinion and project certification are not considered allowable pre-award expenses per the BEAD NOFO. (See question 22 above.)

34. Will you add back in any FCC-identified RDOF default locations for this BEAD round?
Any locations that are determined to be Broadband Serviceable Locations as a result of the BEAD Challenge Process and approved by NTIA will be included in the final location list.

35. Is the Reference Price number meant to be the total cost for end-to-end fiber for all the BEAD locations in a PAU?
Reference pricing is based on CostQuest pricing, but it is an amalgamation of different technology types including fiber, fixed wireless, and satellite. The total reference price must add up to the total funding the state has available and must be distributed across all Project Area Units (PAU).

36. What are your current estimates or best guess at a range for the extreme high-cost threshold?
While reference pricing sets a benchmark for estimated costs per Project Area Unit (PAU), the Extremely High Cost Per Location Threshold (EHCPLT) will be determined by actual costs proposed in project applications. WBO will not determine the EHCPLT until after applications are reviewed.

37. Is CBG no longer being used to determine project areas? Is PAU, which may not match the original CBG groups, now being used?
WBO is using the Project Area Unit (PAU) as the minimum project area for an application. PAUs are subsets of a Census Block Group (CBG). One or more PAUs may make up a CBG; no PAUs cross CBG boundaries. An application must address at least one PAU. A subgrantee applicant that wants to serve an entire CBG can select all the PAUs that make up the CBG.

38. Given the scoring criteria where 50 points are based on the benchmark calculation, if a Project Area Unit has a build cost that is double the benchmark amount, ISPs could get a 0 out of 50. Would they be considered for negotiations in those instances?
If an application is competitive in relation to other applications received for a given Project Area Unit (PAU), WBO can conduct negotiations regardless of the application's score against the benchmark.

39. Please can you provide some further clarification on question 4.1A and how you are calculating "sufficient excess conduit"? Is there any parallel to WYDOT's spare duct policy?
To determine "sufficient excess conduit," WBO is using the following requirement from the BEAD NOFO (Section IV.C.2.b.ii, p. 66):

> ii. Conduit Access Points - Any Funded Network deployment project that involves laying fiber-optic cables or conduit underground or along a roadway must include interspersed conduit access points at regular and short intervals for interconnection by unaffiliated

entities. Where a project proposes to lay conduit, Eligible Entities shall require prospective subgrantees to propose to deploy a reasonable amount of excess conduit capacity and to propose a conduit access point interval as part of the grant application process and shall consider the adequacy of the prospective subgrantee's proposed excess conduit capacity and access points when evaluating the application.

If an application includes infrastructure in the WYDOT rights-of-way, the requirement for conduit and access points detailed in the WYDOT Shared Resource Agreement (SRA) should be detailed in the response to question 4.1A because it addresses future capacity.

40. When we talk about scoring and "BEAD funding request" as a percentage of the "benchmark" does that include or exclude match? In the example included in the BEAD Application Scoring Criteria webinar on 9/30/2024, is the 40% calculated including or excluding match?
If a subgrantee applicant's cost is 40% of the benchmark, the subgrantee applicant will receive 40 points, calculated using the following formula: 40 – (0.4*25) = 40 points received.
If I understand this scoring correctly, then, there could be very few to no points if the "funding request" matches or exceeds the benchmark?
The BEAD funding request should exclude match. Total project cost = BEAD funding request + match. For more information, see:
- Application Guide, Section 2 (pp. 4-5): https://broadband.wyomingbusiness.org/wp-content/uploads/2024/10/FINAL_Application-Guide-v1.1-20241025.pdf
- Benchmark Spreadsheet: https://broadband.wyomingbusiness.org/bead/bead-grant-application/ (under Grant Application Materials)
- Scoring rubric: https://wyomingbusiness.org/wp-content/uploads/2024/09/BEAD-Initial-Proposal_Volume-II_Subgrantee-Selection-Scoring-Rubric-Approved.xlsx

In addition, note that WBO will review all applications and can conduct negotiations regardless of the application's score against the benchmark.

41. Is the pro forma specific to the project or for the entire company?
The pro forma is project specific.

Portal

1. As an applicant, can I review the items uploaded after they have been uploaded? How can I double-check this? How do I replace or delete something I have already uploaded?
To review, replace, or delete your uploaded documents, please select "Step 3 – Document Management." After clicking on Step 3, select "Manage Files." The drop-down menu next to each file name will provide the option to edit/delete uploaded files as needed.

2. Regarding the naming requirements for the attached documents, are we able to add our company name or other text behind the required format?
Yes. We recommend using an underscore (_) or hyphen (-) to separate any additional language from the required portion of the file name.

3. Must I complete the entire application before I can manage documents? I am unable to access document management until everything is completed. Is that intended?

"Step 3 – Document Management" is a validation step, so it requires applicants to complete a certain portion of their applications. However, you can edit your responses as needed before submitting your application.

4. What are the character limits for each textbox entry?

For longer narrative responses the limit is 120,000 characters. Some response fields have a strict limit between 2 – 100 characters where responses are expected in a specific format. Consult the Application Guide for additional character limit length information. If you have specific issues where your narrative exceeds the character limitation, please reach out to WBO.

5. Is there a way to not share credentials for access to the map or application?

While WBO enables multiple users from a company to work on a project application, map credentials are limited to one user per company. There is no specific proprietary information that can be pulled down from the map.

6. May more than one company personnel have application portal access and can more than one person be working on an application at the same time?

While up to two people from the same company can access the portal at the same time, WBO recommends that only one person work on a project application at a time to avoid potential for one user overwriting another's input. Two users in the company can, however, work on separate project applications at the same time. Users within the same company will be able to see all applications and statuses.