Broadband Equity, Access, and Deployment (BEAD) Program

Subgrantee Guide to Oversight, Monitoring, & Reporting

Updated October 2026

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1 Introduction

The Broadband Equity, Access, and Deployment (BEAD) Program, administered by the National Telecommunications and Information Administration (NTIA), was designed to expand high-speed internet access across the country by funding planning and infrastructure deployment. The State of Wyoming was allocated approximately $348 million in BEAD funding to connect all unserved and underserved locations in the state with reliable and affordable broadband. The Wyoming Broadband Office (WBO) is responsible for overseeing these BEAD funds.

WBO issues this Program Guide to provide information regarding the implementation of and requirements for WBO's monitoring and oversight of the state's BEAD Program. This document is intended as a guide for BEAD subgrantees. *This guide is not binding, exhaustive, or final, and it may be updated by WBO at any time.* The BEAD Program is subject to both federal and state law and guidance; it is the responsibility of BEAD subgrantees to comply with all applicable laws and guidance.

This guide should be reviewed in conjunction with applicable law, NTIA's BEAD Restructuring Policy Notice,[1] the BEAD Notice of Funding Opportunity,[2] WBO's BEAD Final Proposal,[3] WBO's BEAD Initial Proposal Volume 2,[4] NTIA's Performance Measures for BEAD Last-Mile Networks Policy Notice,[5] and BEAD Program guidance issued by NTIA.

1.1 WBO's BEAD Subgrantee Monitoring Program

As subgrantees spend BEAD funds on eligible costs such as construction, equipment, services, and personnel, WBO, as the grantee, will monitor its subgrantees to ensure the proper use of the grant funds. This oversight is

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[1] "BEAD Restructuring Policy Notice," NTIA, June 6, 2025, https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf.
[2] "BEAD Notice of Funding Opportunity (NOFO)," NTIA, May 12, 2022, https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf.
[3] "BEAD Final Proposal," https://broadband.wyomingbusiness.org/wp-content/uploads/2026/02/BEAD-Final-Proposal-Materials.zip
[4] "BEAD Initial Proposal Volume 2," WBO, https://broadband.wyomingbusiness.org/wp-content/uploads/2024/10/Wyoming-BEAD-Initial-Proposal-Volume-II-Approved.pdf.
[5] "Performance Measures for BEAD Last-Mile Networks Policy Notice," NTIA, Sept. 19, 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-09/Performance_Measures_Policy_Notice.pdf.

critical to ensuring subgrantees' program compliance and timely and accurate reporting as required by NTIA.

WBO will adjust its monitoring to fit the subgrantee risk determination, programmatic updates from NTIA, and other factors that may require modifications to the plan. WBO's monitoring and oversight started as part of the prequalification and grant application process and have continued through each phase of WBO's BEAD Program implementation.

WBO has posted its sample subaward agreements on its website to further explain subgrantees' implementation, reporting, and compliance requirements. The agreements include provisions such as milestone-based payments, clawback provisions, timely reporting, Build America, Buy America (BABA) compliance, and environmental and historic preservation (EHP) requirements.

The data generated from WBO's monitoring activities will aid WBO in overseeing subgrantees' compliance and in reporting BEAD Program accomplishments and outcomes.

1.2 Understanding Milestone Reimbursements

BEAD subgrantees will receive a fixed amount subaward, which "is a type of subgrant agreement where payments are based on meeting specific requirements of the federal award (e.g., performance and results), rather than actual costs incurred."[6]

NTIA's BEAD guidance[7] and 2 CFR § 200 describe some fixed amount subaward payments as "reimbursements," but NTIA's guidance clarifies that these payments are for milestone achievement (e.g., "[c]osts must be reimbursed to subgrantees in accordance with either objectives met, units built, or total project complete"). *For consistency with NTIA's terminology, this document uses "reimbursement" when referring to milestone-based payments made to BEAD subgrantees.*

Prior to commencement of a project, subgrantees must present a project plan to WBO for approval and agree to a milestone schedule that outlines the

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[6] "Fixed Amount Subaward Overview," NTIA, June 2024, https://broadbandusa.ntia.gov/sites/default/files/2024-06/Fixed_Amount_Subaward_One_pager_2.pdf.

[7] "Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2023-12/BEAD_Policy_Notice_of_Part_200_Exceptions_Related_Issues.pdf.

project's specific deliverables and expectations for reimbursements. Grant funds will be reimbursed based on completion and verification of these pre-determined milestones. Milestones may include the completion of a certain percentage of connected locations, activations of locations with BEAD-compliant capacity, and other similar, verifiable achievements.

A limited amount of the subaward may be reimbursed prior to deployment upon completion of agreed-upon milestones related to a completed project plan, environmental and historic preservation (EHP) activities, design plans, materials procurement, and permits.

WBO may request additional documentation (e.g., engineering schematics, customer activation data) at any time to verify the reasonableness of costs and subgrantees' compliance with BEAD requirements. WBO may withhold reimbursements if it determines that submitted documentation is insufficient.

For terrestrial subgrants,[8] subgrantees are responsible for maintaining letters of credit or surety/performance bond coverage and monitoring compliance until 100 percent of project locations are built out or the period of performance ends. For LEO Capacity Subgrants, subgrantees must maintain their letters of credit for at least four years after the date of certification that broadband service can be initiated to all BEAD locations in their projects. Letters of credit or surety/performance bond coverage may be reduced based on milestone completion, as determined by WBO.[9]

Details about WBO's BEAD Program subgrant reimbursement process are in Section 6.

1.3 A Word on BEAD Deployment Timelines

Subgrantees have a period of four years from the date of the subgrant to complete deployment, followed by an extended 10-year period of performance for Capacity Subgrants awarded for deployment of low-Earth orbit (LEO) projects.

The BEAD Program deployment period for terrestrial projects is established at four years from the date of subgrant execution, consistent with the statutory deadline prescribed in the Infrastructure Investment and Jobs Act (IIJA). While federal regulations may permit a discretionary extension to a maximum

[8] NTIA uses the term "infrastructure" to differentiate terrestrial subgrants from subgrants that reserve LEO satellite capacity.
[9] "BEAD Letter of Credit Waiver," NTIA, https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD-Letter-of-Credit-Waiver.

of five years under specific circumstances, WBO will administer the deployment phase of the program and make reimbursements to subgrantees under the baseline assumption of a four-year deployment timeline. All project planning, milestone scheduling, and performance benchmarks shall be structured to achieve full deployment within this statutory period.

During the deployment phase, program administration will utilize an integrated framework linking technical milestones, performance metrics, and reimbursement schedules. Subgrantee compensation will be contingent upon successful achievement of predetermined milestones within established timeframes, creating a direct correlation between project progress and fund reimbursement.

The BEAD Program deployment period for Capacity Subgrants awarded for deployment of LEO projects is established at no more than four years from the date of subgrant execution, consistent with the statutory deadline prescribed in the Infrastructure Investment and Jobs Act (IIJA). WBO will administer the deployment phase of the program and make reimbursements to subgrantees under NTIA rules that allow for advance payments for milestones achieved during the deployment period. All project planning shall be structured to achieve full deployment within this statutory period of deployment.

For LEO Capacity Subgrants, WBO will make reimbursements and confirm subgrantees' compliance with BEAD service and performance requirements for the BEAD Program's extended 10-year period of performance.[10] These reimbursements will include semi-annual reimbursements in equal amounts that will continue through the extended 10-year period of performance, contingent upon verification of BEAD-qualifying service to all BSLs, including the ability to activate service within 10 days at no additional cost to the subscriber, and subgrantees' continued compliance with BEAD performance and program requirements.

WBO will implement a continuous risk assessment protocol to evaluate subgrantee capacity and performance trajectory throughout the grant period. Any evidence suggesting that a subgrantee may be unable to achieve complete project deployment within the four-year statutory timeframe (and, for LEO subgrantees, evidence suggesting they may be unable to continue to

[10] "BEAD Restructuring Policy Notice, NTIA, June 6, 2025, https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf ("Conditions of LEO Capacity Subgrants," p. 19).

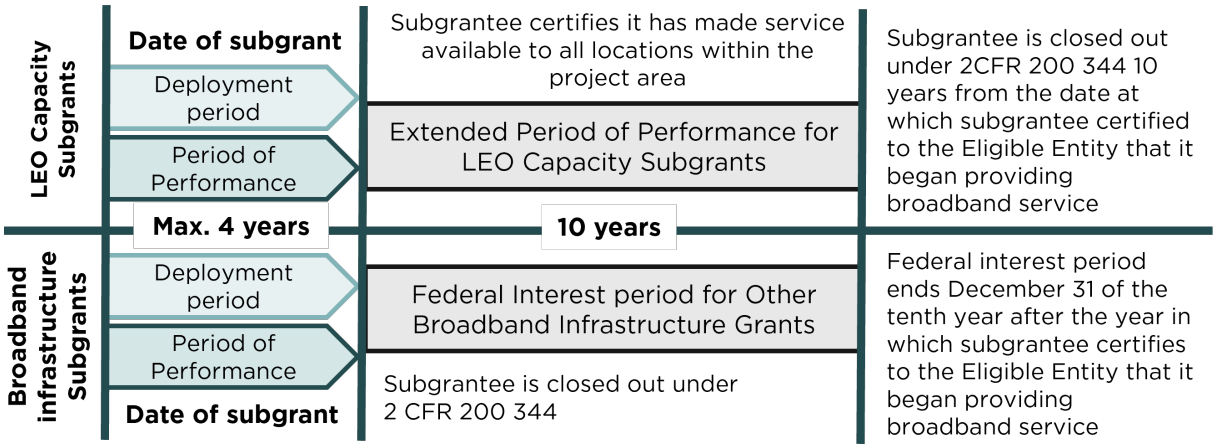
provide service for the extended 10-year period of performance) will lead to a formal risk evaluation.

The risk assessment and evaluation may result in corrective action plans, increased reporting requirements, or technical assistance interventions. WBO may suspend reimbursement until corrective actions have been completed. If WBO determines a subgrantee is unable to remediate the risks through successful execution of corrective actions, WBO may pursue enforcement actions, including potential grant modifications and clawbacks of reimbursed funds, to ensure optimal utilization of BEAD resources and subgrantees' compliance with statutory timelines.

Subgrantees are expected to maintain project schedules that demonstrate consistent progress toward full completion within the established four-year deployment window. LEO subgrantees are also expected to demonstrate the capacity to provide service over the extended period of performance. In addition, subgrantees must ensure timely responses to and compliance with all information requests from WBO to avoid delays and noncompliance with federal program requirements.

The graphic below presents an overview of the BEAD deployment timeline.

Figure 1: Period of Performance for LEO Capacity Subgrants and Federal Interest Period for Broadband Infrastructure Grants (Source: BEAD Restructuring Policy Notice, NTIA)[11]



[11] "Broadband Equity, Access, and Deployment (BEAD) Program: BEAD Restructuring Policy Notice," NTIA, June 2025, https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf.

2 Key Subgrantee Requirements

The following subsections provide an overview of subgrantees' high-level BEAD Program requirements.

Please note: Subgrantees may not initiate any ground-disturbing construction activities, activities that disturb the ground—such as excavating, grading, trenching, and storing material—and may only engage in limited deployment activities, such as engineering, project planning, permitting, and EHP-related activities, as approved by WBO until the EHP process has been concluded and approved by NTIA and a Notice to Proceed has been issued by WBO.

2.1 Waste, Fraud, and Abuse

Subgrantees must meet BEAD Program requirements related to WBO's monitoring of fraud, waste, and abuse.

As a general rule, 2 CFR § 200 (Uniform Guidance) establishes measures at each part of the grant lifecycle to protect federal funds from risk.[12] In addition, Section IX.G of the BEAD NOFO, "Transparency, Accountability, And Oversight Required," requires that Eligible Entities such as WBO implement BEAD in a manner that will "[m]inimize the opportunity for waste, fraud, and abuse." [13] To satisfy this requirement, the NOFO requires Eligible Entities to conduct audits of grantees, develop and implement monitoring and oversight plans, and impose necessary conditions on BEAD awards as may be required to mitigate the risk of nonperformance.

Therefore, WBO will monitor subgrantees for indications of falsifying information, lying, cheating, misappropriating funds, or stealing. To assess risk and monitor against instances of fraud, waste, or abuse, WBO will evaluate subgrantees for:

- Financial stability
- Quality of management systems
- History of performance

[12] "Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2023-12/BEAD_Policy_Notice_of_Part_200_Exceptions_Related_Issues.pdf.
[13] "BEAD Notice of Funding Opportunity (NOFO)," NTIA, May 12, 2022, https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf.

- Submission of audit reports
- Ability to comply with program requirements

WBO has incorporated this requirement into the procedures described in this guide and its overall approach to BEAD grant monitoring and oversight. The objective is to ensure that subgrantees utilize BEAD funds for their statutory purpose and comply with the Infrastructure Act, BEAD NOFO, 2 CFR § 200, award terms, and applicable law.

Allegations of fraud, waste, abuse, and mismanagement may be made anonymously through the Office of Inspector General (OIG) Hotline at 1-833-791-2262 or submitted to WBO's website. Potential fraud, waste, or abuse should be reported as soon as possible so the allegations can be investigated, any problems can be stopped, and remedies can be pursued.

2.2 Project Term

BEAD subgrantees must complete deployment of their projects within the timelines set by their subaward agreements.

BEAD subgrantees must diligently pursue the implementation of their projects to ensure completion by the end of the term, including all necessary environmental and historic preservation approvals, engineering, permitting, make-ready, construction, and customer activations. Subgrantees must certify in writing to WBO that a project reached completion by the end of the term.

Subgrantees are expected to submit all required documentation demonstrating compliance with the subaward agreement and all reporting obligations within 30 calendar days of the submission of the project completion certification or such other period as WBO may establish consistent with federal law.

If a subgrantee fails to complete a project within the required term, WBO may revoke the subaward agreement and the subgrantee shall not be entitled to payment of the balance of the grant amount and may be subject to clawbacks.

Wyoming Broadband Office will submit a final performance report to the subgrantee no later than 90 calendar days after the conclusion of the period of performance (2 CFR 200.329).

2.3 Testing

Subgrantees will be required to conduct testing using performance measures outlined by NTIA in its *Performance Measures for BEAD Last Mile Networks Policy Notice*[14] and any subsequent testing guides NTIA or WBO may provide (see Appendix A for details on NTIA performance testing). Additionally, subgrantees will be required to conduct testing and submit test data to WBO in conjunction with applicable milestone-based reimbursement requests (see Appendix E for testing requirements). WBO may also conduct its own testing to confirm BEAD-compliant service levels and completion of physical deployment.

2.4 Eligible Program Expenses

Subgrantees must maintain documentation regarding all eligible expenses. While reimbursements will be made based upon milestone completion, the subgrantee must be able to provide documentation for eligible expenses for future reviews and audits, as well as to document matching expenditures. The BEAD NOFO,[15] modified by the BEAD Restructuring Policy Notice,[16] specifies the following eligible uses of funding for last-mile deployment under the Program:

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.

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[14] "Performance Measures for BEAD Last Mile Networks Policy Notice," NTIA, Sept. 19, 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-09/Performance_Measures_Policy_Notice.pdf.
[15] "BEAD Notice of Funding Opportunity (NOFO)," NTIA, May 12, 2022, https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf.
[16] "BEAD Restructuring Policy Notice," NTIA, June 6, 2025, https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf.

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.

For LEO Capacity Subgrants, eligible expenses are expected to be:

1. Reservation of capacity on a LEO satellite network for each location that meets the BEAD Program's performance and technical requirements.
2. Necessary consumer premises equipment.
3. Initial, non-recurring services.

While NTIA allows certain pre-award expenses to be reimbursed, any subgrantee costs for the project incurred before or after the term of the subaward agreement are not eligible for reimbursement without advance approval by WBO. No BEAD application expenses and no expenses incurred prior to NTIA approval of the Final Proposal and Final Proposal Funding Request costs will be approved for pre-award. No ground-disturbing costs incurred prior to the Notice to Proceed will be considered eligible for payment.

The grant amount does not include research and development costs in accordance with 2 CFR § 200.1, 200.332. The cost principles for federal grants require that all subgrantee costs must be allowable, necessary, reasonable, and allocable for the project. In addition, project costs must be adequately documented in accordance with applicable law, this Program Guide, and NTIA and WBO guidance to be eligible for reimbursement. To fulfill the requirements of 2 CFR § 200.302(b), the subgrantee must have a financial system/software that is capable of generating itemized reports on an individual project basis to verify total project expenditure and match expenditure throughout the period of performance.

2.5 Records Retention

Under 2 CFR § 200.334, subgrantees must retain all records related to federal awards for at least three years after final payments and the award is closed out.[17] For example, LEO Capacity Subgrants will have a 10-year period of performance; therefore, LEO Capacity subgrantees must retain all records for 13 years (10-year period of performance + 3-year record retention). Non-LEO subgrantees will have a standard period of performance of up to 4 years (or as extended by NTIA) and must therefore retain all records for up to 7 years (4-year period of performance + 3-year record retention) total.

In addition, there is a separate record retention requirement for any real property, equipment, or facilities acquired with federal funds.[18] NTIA established that the Federal Interest Period for BEAD-funded broadband infrastructure is 10 years after the year the project is completed. [19] Note that NTIA clarified that LEO Capacity Subgrants do not create a federal interest, because those subgrants are only reserving capacity for service delivery.[20]

Exceptions to the three-year retention requirement include litigation, claims, or audit findings involving the records, in which case records must be retained until all litigation, claims, or audit findings have been resolved; or notification by NTIA, the Commerce Department, or any other relevant federal agency to extend the retention.[21]

Records that subgrantees should preserve include but are not limited to:

- The application itself (including narrative, budgets, maps, and other attachments)
- Award documents (including any terms and conditions or special award conditions)

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[17] 2 CFR § 200.334, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR4acc10e7e3b676f/section-200.334.
[18] 2 CFR § 200.310 – 200.316, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR8feb98c2e3e5ad2.
[19] "BEAD Restructuring Policy Notice," NTIA, June 2025, https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf.
[20] "BEAD Guidance on NEPA and NHPA for LEO Satellite Service," NTIA, October 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BEAD_LEO_Guidance_Oct_2025.pdf.
[21] For additional information on exceptions to the requirement, see 2 § CFR 200.334; https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR4acc10e7e3b676f/section-200.334.

- Any associated modifications to the application or award
- Financial documents regarding expenses and income
- Grant-related process documentation
- Grant-related procurements and contracts
- Key correspondence between WBO and the subgrantee
- Evidence of compliance with all award terms and conditions, including lobbying disclosures, SAM reporting on compensation, whistleblower protections, and other grants terms and conditions
- Copies of reimbursement or payment requests and supporting documentation associated with those requests (including invoices and approvals thereof), along with any curing, corrective action, or payment records
- Evidence of compliance with environmental and historic preservation requirements, any correspondence with federal, state, or Tribal entities, and any concurrences, no-effect determinations, or other records of decisions from federal, state, or Tribal entities (including permit applications and approvals, and documentation of completion of any required mitigation actions)
- If applicable, records demonstrating appropriate property management, maintenance, and use
- Copies of all programmatic and financial reports submitted during the period of performance, including quarterly, annual, and closeout reports
- Copies of all technical materials submitted as part of grant oversight and implementation, such as design and engineering, permitting records, bills of materials, as-built drawings, and testing and verification results
- Notes from check-in calls and other informal monitoring activities
- Notes from desk reviews, as well as copies of documents shared during desk reviews, along with desk review results or reports
- Notes from site visits, as well as copies of documents shared during site visits, along with any site visit reports and photos

- Notes from field inspections, as well as copies of documents shared during inspections, along with any reports and photos from the inspection
- Any formal corrective action associated with an award
- Evidence of program accomplishments
- Property disposition forms
- Final closeout letter
- Other records as directed by WBO, including any records related to complaints or legal actions

To comply with record-keeping requirements, subgrantees should set up a repository or "grant file" to store all relevant grant-related documents during the record retention period. Appropriate staff should have access to the grant file, and records should be organized for rapid location and production, if needed. During site visits, WBO will review the subgrantee's system and procedures for record retention.

2.6 BABA Compliance

Per NTIA's Build America, Buy America Compliance and Documentation Requirements and Procedures, the BABA Act[22] established a domestic content procurement preference (Buy America Preference) for all federal financial infrastructure assistance obligated after May 14, 2022. The Buy America Preference requires that all iron, steel, manufactured products, and construction materials used in covered infrastructure are produced in the United States, subject to specific definitions, thresholds, and waiver provisions. Covered infrastructure includes structures, facilities, and equipment used to provide broadband internet service. NTIA grants made after May 14, 2022, that involve the construction, alteration, or repair of broadband infrastructure are therefore subject to the Buy America Preference. BABA obligations flow from NTIA through state broadband offices to subgrantees via grant and subgrant terms, creating binding procurement requirements that apply throughout project implementation. The requirements attach to infrastructure deployment activities including network construction, equipment installation, and related civil works, while

[22] "Build America Buy America," U.S. Department of Commerce, https://www.commerce.gov/oam/build-america-buy-america.

administrative costs and non-construction activities generally fall outside BABA's scope.

BABA establishes distinct requirements for material categories with varying domestic content standards. Iron and steel products must be produced entirely in the United States, meaning all manufacturing processes from initial melting through final product formation occur domestically, with no foreign content permitted. Manufactured products must be manufactured in the United States and contain components mined, produced, or manufactured domestically such that domestic component costs exceed 55% of total component costs.

Construction materials must be manufactured in the United States but have no minimum domestic content requirement for constituent components or raw materials. For BEAD projects, these categories encompass structural steel components, fiber optic cables, network electronics, conduit systems, concrete, and other materials incorporated into broadband infrastructure.

Subgrantees bear responsibility for ensuring BABA compliance throughout procurement and construction,[23] which will require integration of domestic content requirements into solicitation documents, specifications, and contract terms. Procurement procedures must communicate BABA requirements to contractors and suppliers, obtain certifications or representations regarding domestic content, and maintain documentation demonstrating compliance.

Procurement documents should identify applicable categories for each material type and state each material's required domestic content thresholds. For manufactured products subject to domestic content thresholds, detailed component cost documentation may be necessary to verify compliance, particularly for complex products like fiber optic cable or network electronics where domestic content percentages approach the required threshold.

Contractor and supplier certifications provide the primary compliance verification mechanism, identifying the applicable BABA category for each product, confirming manufacturing location, and for manufactured products, certifying the domestic content percentage based on verifiable cost records.

[23] "BABA Compliance and Self Certification," NTIA, https://broadbandusa.ntia.gov/technical-assistance/BABA_Compliance_and_Self_Certification.

BABA establishes three statutory waiver categories, permitting use of foreign-sourced materials when specific conditions exist:

- *Public interest waivers* may be granted when applying BABA requirements would be inconsistent with the public interest, based on factors including infrastructure deployment timelines or national policy objectives.
- *Non-availability waivers* apply when required materials are not produced in the United States in sufficient and reasonably available quantities or of satisfactory quality. Subgrantees will be required to document market research demonstrating the absence of acceptable domestic alternatives.
- *Unreasonable cost waivers* may be granted when BABA compliance would increase overall project costs by more than 25 percent, calculated on a project-wide basis rather than for individual products.

Waiver requests must be submitted through WBO to NTIA with comprehensive supporting documentation, and procurement cannot proceed using foreign-sourced materials until NTIA grants the waiver, necessitating advance planning and early identification of potential waiver needs. Note that waiver requests to NTIA should only be pursued in extraordinary circumstances as NTIA has finalized its BABA guidance, and any waiver request is likely to significantly delay project completion and put its completion at risk.

NTIA has issued BEAD-specific guidance addressing implementation challenges unique to broadband deployment, recognizing that certain telecommunications equipment may have limited domestic manufacturing capacity. NTIA has granted categorical waivers for specific product types where domestic manufacturing cannot support nationwide deployment timelines, published on Department of Commerce's website and providing blanket authorization without requiring individual project-level waiver requests. Fiber optic cable is categorized as a manufactured product subject to domestic content thresholds of greater than 55 percent of the cost rather than the all-domestic requirement for iron and steel, while electronics and active equipment present ongoing compliance challenges due to global supply chains and limited domestic telecommunications component manufacturing. Subgrantees should monitor NTIA guidance for updates to

categorical waiver availability and initiate early dialogue with WBO regarding equipment compliance strategies.

BABA requirements operate in conjunction with other federal procurement and security requirements applicable to BEAD projects. The Secure and Trusted Communications Networks Act prohibits use of federal funds to purchase equipment or services from covered companies including Huawei, ZTE, Hytera, Hikvision, and Dahua, creating an independent restriction that applies regardless of BABA compliance status. Equipment satisfying BABA domestic content requirements must still comply with supply chain security prohibitions. WBO will monitor BABA compliance through review of procurement documentation, site visits, and audits, with non-compliance potentially resulting in disallowed costs, required replacement of non-compliant materials at subgrantee expense, repayment of federal funds, or other remedial actions including grant suspension or termination.

Subgrantees should integrate BABA compliance into project planning from the earliest stages, conducting market research to identify available compliant products, engaging suppliers regarding domestic content capabilities, and identifying waiver needs well in advance of procurement deadlines. Subgrantees should establish ongoing communication with WBO regarding compliance questions and emerging guidance, as NTIA continues refining BABA implementation through new categorical waivers, compliance guidance, and requirement modifications.

Subgrantees should note NTIA's guidance regarding BABA compliance, which details enforcement actions, such as clawback of federal funds, for subgrantees that do not abide by the BABA requirement. For example:

> *"b. Failure to provide necessary BABA compliance documentation could result in a violation of the terms and conditions of a recipient's financial assistance agreement.*
>
> > *i. Corrective action for this and other BABA violations may entail removing and replacing improperly purchased foreign-manufactured goods, reducing the amount of an award, or*

withholding future funds and terminating an award. In cases of fraud, it could result in criminal investigation and prosecution."[24]

2.7 Audit Requirements

Subgrantees must meet the BEAD Program's audit requirements, which follow 2 CFR § 200 with specific modifications tailored to the unique nature of broadband infrastructure projects, including BABA compliance, proper match valuation and documentation, and compliance with federal interest property requirements.[25]

Audits must comply with the standards set forth in 2 CFR § 200.[26] Under 2 CFR § 200.501, a single or program-specific audit is required for non-federal entities (e.g., state agencies, nonprofits) that expend an aggregate of $1 million or more in federal awards during their fiscal year. This threshold applies per entity per year and is based on funds expended.

Note that per 2 CFR § 200.501(e), entities that expend less than $1 million in federal awards during their fiscal year are exempt from federal audit requirements, although they must still maintain records for review by federal officials. [27]

The BEAD NOFO requires that for-profit entities conduct "either: (i) a financial related audit of each DOC [Department of Commerce] award or subaward in accordance with Generally Accepted Government Auditing Standards; or (ii) a program-specific audit for each award or subaward in accordance with the requirements contained in 2 C.F.R. § 200.507." [28]

All subgrantees that have a single audit must submit the reporting package and data collection form to the Federal Audit Clearinghouse in accordance

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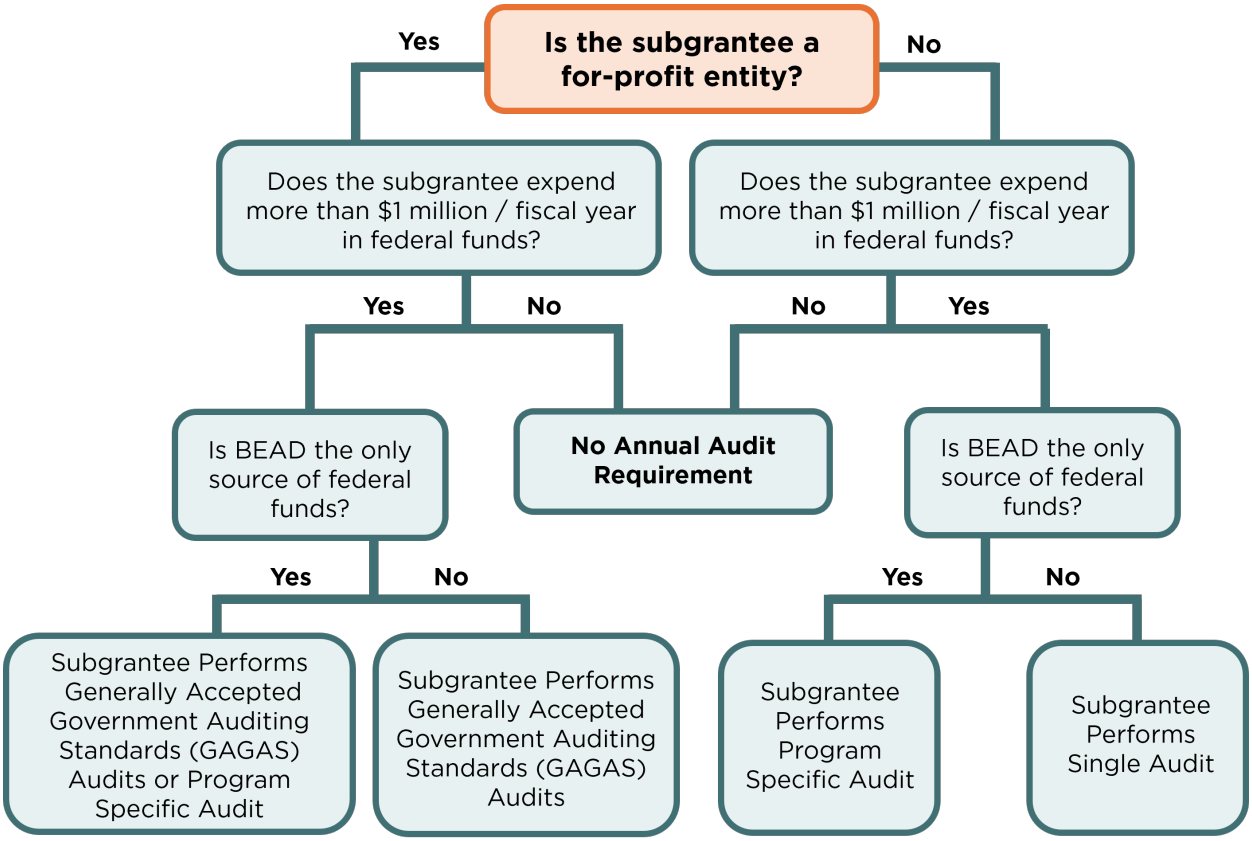
[24] "Build America, Buy America Compliance Documentation Procedures," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2024-07/BABA_Compliance.pdf.
[25] "Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2023-12/BEAD_Policy_Notice_of_Part_200_Exceptions_Related_Issues.pdf.
[26] 2 CFR § 200 Subpart F, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F.
[27] 2 CFR § 200.501, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F/subject-group-ECFRfd0932e473d10ba/section-200.501.
[28] "BEAD Notice of Funding Opportunity (NOFO)," Section VII.G, NTIA, May 12, 2022, https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf.

with 2 CFR § 200.512.[29] Copies of all required audits must be submitted to WBO.

Subgrantee audit obligations differ based on whether the subgrantee is a non-federal or for-profit entity, as described in the subsections below. For more information, subgrantees should review the requirements in 2 CFR § 200 Subpart F[30] and the specific audit requirements in 2 CFR § 200.501.[31]

Figure 2: Federal Audit Requirements



2.7.1 Audit Requirements for Non-Federal Entities

If the subgrantee's organization is a non-federal entity, like a state agency or a non-profit, that expends $1 million or more in federal awards during a fiscal

[29] 2 CFR § 200.512, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F/subject-group-ECFRc3bd6ae97de5a40/section-200.512.
[30] 2 CFR § 200 Subpart F, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F.
[31] 2 CFR § 200.501, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F/subject-group-ECFRfd0932e473d10ba/section-200.501.

year and the BEAD Program is the only source of federal funds, the subgrantee must perform a program-specific audit and submit it to the Federal Audit Clearinghouse, as required by 2 CFR § 200 Subpart F. [32]

If the subgrantee's organization is a non-federal entity that expends $1 million or more in federal awards during a fiscal year and the BEAD Program is *not* the only source of federal funds, the subgrantee must perform a single audit and submit it to the Federal Audit Clearinghouse, as required by 2 CFR § 200.501.[33] The single audit encompasses all federal awards the subgrantee's organization has received, providing a comprehensive review of federal expenditures.

2.7.2 Audit Requirements for For-Profit Entities

For-profit subgrantees such as private ISPs are not subject to the audit obligations established by 2 CFR § 200.501. Instead, 2 CFR § 200.501(i) specifies that the pass-through entity (WBO, in this case) is responsible for establishing requirements to ensure audit compliance by for-profit subgrantees. [34]

The BEAD NOFO[35] establishes minimum audit standards for for-profit entities based on 2 CFR § 200 Subpart F. If a for-profit organization expends $1 million[36] or more in grant funds during the fiscal year and the BEAD Program is the only source of federal funds, the subgrantee may perform one of the following:

- A Generally Accepted Government Auditing Standards audit of each federal award or subaward, or
- A program-specific audit for each award or subaward in accordance with 2 CFR § 200.507

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[32] 2 CFR § 200 Subpart F, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F.
[33] 2 CFR § 200.501, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F/subject-group-ECFRfd0932e473d10ba/section-200.501.
[34] 2 CFR § 200.501, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F/subject-group-ECFRfd0932e473d10ba/section-200.501.
[35] "BEAD Notice of Funding Opportunity (NOFO)," Section VII.G, NTIA, May 12, 2022, https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf.
[36] Note: The BEAD NOFO cites $750,000 as the threshold based on 2 CFR § 200 Subpart F as of the date of the NOFO. Since then, the dollar amount identified in 2 CFR § 200 Subpart F has increased to $1 million.

If a for-profit organization expends $1 million or more in grant funds during the fiscal year and the BEAD Program is *not* the only source of federal funds, the subgrantee must perform a Generally Accepted Government Auditing Standards audit of each federal award or subaward.

2.8 Project Change Orders

In the event a subgrantee seeks to make certain types of changes to its project, the subgrantee must request a Change Order, which is a revision to the subaward agreement that requires written approval from WBO and, in some cases, an amendment to the grant contract.

A subgrantee may request different types of change orders such as a revision to project budget, project schedule, or project scope, and a contact change. Subgrantees may request a change order by submitting a change order request (COR) in WBO's grant management system. Change order requests that assign the project or some of its assets to another party, substantively change award amount or construction methods, change technology type, change matching fund categories or valuation methods, or substantially reduce the number of certain types of locations will also require NTIA approval and may require NIST approval.[37]

If the change order request is approved and if it is determined to require an amendment to the contract, this process will require legal oversight and approval by WBO's Counsel and will include the negotiation, drafting, and signing of an amendment to the initial subaward agreement. The contract amendment will be drafted by WBO's General Counsel and signed by the Authorized Organization Representatives of both WBO and the subgrantee.

WBO will act on subgrantee requests for revisions in a timely manner. Consistent with 2 CFR § 200.208, WBO will respond to a subgrantee's change order request within 30 calendar days of receipt of a complete request, or such other period as WBO may establish consistent with federal law. WBO's response may consist of an approval, a denial, a request for additional information necessary to evaluate the request, or notice that the request requires NTIA and/or NIST review and the anticipated timeframe for that review. If WBO requests additional information, the 30-day response period will restart upon WBO's receipt of the complete supplemental information.

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[37] "BEAD Scope Change and Budget Modification Guidance For Eligible Entities," NTIA, https://broadbandusa.ntia.gov/technical-assistance/BEAD_Eligible_Entity_Guidance_Scope_Change_and_Budget_Modification.

For change order requests that require NTIA approval and, where applicable, NIST approval, such as requests that assign the project or its assets to another party, substantively change the award amount or construction methods, change technology type, change matching fund categories or valuation methods, or substantially reduce the number of certain types of locations—WBO's 30-day commitment applies to WBO's own review and transmittal of the request; final disposition remains subject to the applicable federal review timelines.

3 Subgrantee Risk Assessments and Monitoring Plans

The BEAD Program requires robust monitoring and oversight systems to ensure subgrantees meet federal requirements and achieve successful broadband deployment within statutory timelines. State broadband offices such as WBO maintain primary monitoring responsibility, with oversight from NTIA and support from federal technical agencies.

BEAD grants will be subject to the terms and conditions of the subaward agreement for the project as well as all applicable federal, state, and local laws and guidance. Subgrantees must comply with all applicable state and federal regulations and program-specific requirements throughout the period of performance. WBO will implement a systematic monitoring program that combines desk reviews, site visits, financial analysis, and risk-based assessments to verify subgrantee compliance and oversee project progress.

Risk-triggers for elevating monitoring levels

- Reports of fraud, waste, or abuse
- Significant timeline modifications
- Delays securing key permitting
- Excessive or significantly lagging spending
- Uncertainty over matching commitments
- Consistently non-compliant reporting
- Potential violation of federal, state, or BEAD conditions
- Violation of award conditions and certifications
- Failure to update risk management plans against new risks
- Audit findings
- Key management or personnel changes affecting project
- Issues with other projects administered by WBO
- Failure to manage BABA compliance

WBO has adapted and updated its approach to subgrantee risk assessment and monitoring activities from the "Final Proposal Requirement 4: Oversight and Accountability Processes Attachment 4.2(1): Program Monitoring Plan" published on the WBO website.

More information on the compliance requirements and procedures applicable to BEAD can be found in NTIA's *BEAD Frequently Asked Questions*[38] as well as NTIA's BEAD website.[39]

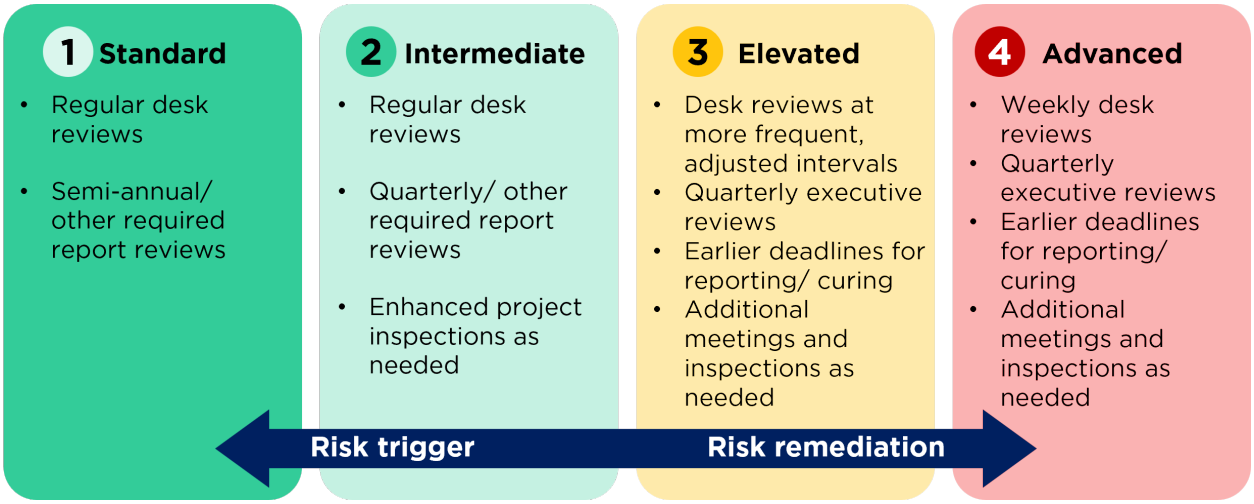
Monitoring activities may be adjusted, as needed, to align with WBO's available staff and contract resources. Regardless of changes to monitoring levels, WBO commits to adequate and effective monitoring.

Note that the requirements in much of this section are tailored to projects deploying terrestrial infrastructure. For detailed requirements specific to LEO Capacity Subgrants, please review Appendix C in conjunction with this section.

3.1 Establishing Monitoring Levels

WBO will establish initial monitoring levels using a combination of fixed subgrantee or award attributes (e.g., grant funding, project size, number of BSLs, topography), objective characteristics (e.g., financial, managerial and organizational capacity), and previous experience. The monitoring levels are described in the following section.

Figure 3: Risk-based Monitoring Levels



[38] "Broadband, Equity, Access and Deployment (BEAD) FAQs," NTIA, https://broadbandusa.ntia.gov/technical-assistance/BEAD_FAQs.
[39] "BEAD Program," NTIA, https://broadbandusa.ntia.gov/funding-programs/broadband-equity-access-and-deployment-bead-program.

3.2 Levels of Monitoring

WBO will apply one of four levels of monitoring to subgrantees, depending on the subgrantee's compliance status. WBO may change monitoring levels and activities as circumstances require, depending on each subgrantee's risk status.

3.2.1 Standard Monitoring

Standard monitoring comprises the following activities for each subgrantee:

- Review of semi-annual and other required reports
- Regular desk reviews
- Annual project inspection to confirm milestones completed

3.2.2 Intermediate Monitoring

In addition to the standard monitoring tasks, subgrantees subject to intermediate monitoring will have up to two site visits per year and are more likely to receive project meetings, subject to staff resources.

3.2.3 Elevated Monitoring

In addition to standard and intermediate monitoring tasks, elevated monitoring will comprise the following activities for each subgrantee:

- Monthly conference call with subgrantee, depending on the cause of the elevated monitoring status; subgrantees requiring technical assistance are more likely to receive bi-weekly calls
- Careful scrutiny of reporting, especially during quarterly desk reviews, and additional project meetings, if needed
- Additional site visits, as required

3.2.4 Advanced Monitoring

Advanced monitoring may comprise the following activities for each subgrantee:

- Weekly scheduled calls
- Quarterly executive-level review sessions

- Early deadlines for careful scrutiny of reporting to allow sufficient time for curing
- Additional project inspections, project meetings, and site visits, as required

3.2.5 Changing the Monitoring Level

Any monitoring activity described in this section could result in a change in the monitoring level assigned to any subgrantee. Events that can trigger a recommendation for an upward adjustment of a project's monitoring status include, but are not limited to:

- Reports of fraud, waste, or abuse
- Significant modifications in timeline or milestone commitments
- Failure to secure permitting as forecasted
- Unforeseen delays, such as those caused by weather or material delivery
- Excessive or significantly minimal drawdown of federal funds
- Uncertainty over the subgrantee's ability to meet matching commitments
- Consistent delinquency on submission of or completeness of reports
- Potential violation of federal, state, or BEAD conditions
- Violation of award conditions and certifications
- Failure to update or provide a compliant supply chain risk plan or cybersecurity plan if specific risks that could affect project completion were identified
- Audit findings
- Management or key personnel changes that could impact performance
- Subgrantee issues identified with other projects administered by WBO
- Failure to maintain documentation demonstrating compliance with BABA or failure to obtain approved waivers prior to procuring non-compliant materials

WBO may conversely adjust monitoring levels downward upon successful remediation of identified risks. WBO will inform subgrantees of any adjustments to monitoring levels.

4 Program Reporting Requirements

The BEAD Program establishes comprehensive reporting requirements to ensure accountability, track progress, and verify subgrantees' compliance throughout the deployment lifecycle. These requirements create a structured framework for transparency and enable NTIA to monitor the effective use of federal funds in achieving universal broadband access.

BEAD subgrantees must submit regular reports to WBO, which will then consolidate and transmit information to NTIA. This multi-tiered reporting structure ensures oversight at both state and federal levels. The reporting obligations begin immediately upon subgrant award and continue through project completion and into ongoing service provision.

WBO has adapted and updated its approach to program reporting requirements from the "Final Proposal Requirement 4: Oversight and Accountability Processes Attachment 4.2(1): Program Monitoring Plan" published on the WBO website.[40]

WBO requires all subgrantees to participate in quarterly desk reviews. Subgrantees that WBO determines to be higher risk will be required to participate in project meetings and potentially other monitoring, as described below.

Note that the timing of semi-annual reporting and quarterly desk review submissions may not align. The submissions will be required for different purposes and will contain different content.

[40] "BEAD Final Proposal," https://broadband.wyomingbusiness.org/wp-content/uploads/2026/02/BEAD-Final-Proposal-Materials.zip

Figure 4: Subgrantee Reporting Requirements

Note that the requirements in much of this section are tailored to projects deploying terrestrial infrastructure. For detailed requirements specific to LEO Capacity Subgrants, please review Appendix C in conjunction with this section.

4.1 Information Subgrantees May Need to Track and Report

Subgrantees will be required to track specific information about their BEAD-funded project at the project level, including details at the staging/phasing level when appropriate to detail progress or identify risk. WBO will instruct each subgrantee on its individual requirements.

Terrestrial subgrantees will be required to provide information, including, but not limited to, the following:

- Design progress
- Permit application progress
- Permit approval progress
- Construction progress
- Route completion
- BSL locations and related service completions
- Recordkeeping, including accounting for expenses and application of matching funds
- All data required by NTIA

LEO subgrantees will be required to provide information including, but not limited to, the following:

- Area coverage progress
- Permit application progress, where required
- Permit approval progress, where required
- Capacity availability at BEAD qualifying broadband speeds
- Subscriber take-rate and evidence
- Recordkeeping including accounting for expenses and application of matching funds
- All data required by NTIA

WBO will review subgrantees' submissions for completeness and consistency; and will request any additions and corrections as needed. WBO will verify reporting through testing or inspection, as described in NTIA's *Performance Measures for BEAD Last-Mile Networks Policy Notice.*[41] Based on these submissions, WBO will distill an overall picture of BEAD Program health and identify which projects are considered "at risk" based on reported progress and the completeness and quality of the subgrantee's documentation.

The cadence for submitting materials will depend on each subgrantee's project status and monitoring level. Subgrantees will be informed of their reporting requirements and timing after the initial project plan is approved. Over the life of the program, WBO will continually reevaluate project risk and reserves the right to update reporting requirements.

WBO will provide subgrantees with templates to guide their information gathering and quarterly desk review presentations. These templates will include charts showing percentage completion of design, permitting, and construction activities, as well as whether these elements are progressing on time or experiencing delays. (WBO will provide ongoing technical assistance after the program is initiated to help subgrantees prepare for the program requirements.)

[41] "Performance Measures for BEAD Last-Mile Networks Policy Notice," NTIA, September 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-09/Performance_Measures_Policy_Notice.pdf.

Subgrantees will be required to maintain and submit specific backup documentation to support their quarterly presentations. For infrastructure projects, this documentation includes high-level design materials, street-level design documents, permit applications, approved permits, adequate accounting for match obligation and tracking of match proportionally with federal expenditures, and GIS maps for each project showing the status of all project areas (e.g., complete, under construction, permits approved, permit applications submitted, designs complete).

For LEO projects, this documentation includes permit status as relevant, tracking of expenditures and match amounts, and GIS maps showing progress toward completion and subscriptions, as well as the status of all project areas (e.g., complete, customer premises equipment (CPE)/service requested, CPE delivered, connections activated, tests conducted). When relevant, the documentation for all projects would also include test results for active subscribers.

4.2 Quarterly Desk Reviews

All subgrantees must participate in quarterly desk reviews, in which deployment activities and financial expenditures will be discussed in detail. Participation includes submitting a standard set of required documentation, defined by WBO. These reviews provide real-time visibility into project advancement and identify potential issues before they become critical obstacles. Each quarterly desk review includes several key components that paint a comprehensive picture of project status.

Detailed information regarding deployment milestones achieved during the reporting period will be required. Subgrantees must report the number of locations passed, serviceable locations established, and subscribers activated. Geographic data accompanies these metrics, identifying specific areas where deployment occurred. This granular location data enables NTIA and WBO to verify that previously unserved and underserved locations are receiving service as promised.

Financial reporting within quarterly desk reviews will track both federal BEAD funds and required matching contributions. This reporting must be submitted via the Quarterly Report form in WBO's grant management system. Subgrantees will be required to certify statements regarding the validity of the financial reports with each submission. This financial transparency ensures

funds flow appropriately and helps identify projects experiencing budget challenges that might jeopardize completion.

The quarterly desk reviews will also capture challenges and obstacles encountered during the period. Whether related to permitting delays, supply chain disruptions, workforce shortages, or other issues, documenting these challenges will create a record that contextualizes slower-than-expected progress and enables collaborative problem-solving among subgrantees, WBO, and NTIA.

4.3 Project Meetings

Based on WBO's analysis of quarterly desk review submissions, subgrantees that are deemed to be higher risk, meaning they are assigned a monitoring level above standard monitoring (see Section 3.2), may be required to participate in project meetings to ensure rigorous oversight and early detection of performance or compliance issues. These project meetings will include detailed financial documentation showing all BEAD-related expenditures, budget-to-actual variances, and explanations for any significant deviations from approved spending plans.

Subgrantees will also be required to provide comprehensive project status updates covering construction progress, network deployment milestones achieved, any delays or obstacles encountered, and corrective actions being implemented. The financial reporting component will require supporting documentation such as invoices, payment records, and proof of matching fund expenditures to enable thorough verification of appropriate fund usage.

The monthly reports for higher-risk subgrantees will also address the subgrantees' compliance with program requirements including EHP obligations, BABA provisions, and cybersecurity standards. Subgrantees will be required to include metrics on broadband serviceable locations passed or connected, speeds being delivered, and subscriber adoption rates in served areas. Any instances of noncompliance, potential violations, or risk factors must be promptly disclosed with detailed explanations and proposed remediation plans.

WBO will use these project meetings to maintain continuous monitoring and determine whether additional technical assistance, increased oversight measures, or enforcement actions are necessary. The elevated reporting frequency will allow WBO to identify problems quickly and work with

subgrantees to implement corrective measures before issues escalate or jeopardize project success. Failure to participate in project meetings may lead to additional consequences, including withholding of milestone reimbursements, designation of more restrictive conditions, or potential termination of the subaward. The project meeting requirement will remain in effect until the subgrantee successfully demonstrates improved performance and financial management capabilities sufficient to warrant reclassification to standard risk status.

4.4 Site Visits

Site visits typically last one to two days and are guided by a standardized agenda and published checklist of review items, which are tailored by WBO project staff to fit the issues and circumstances of each site visit. Subgrantees will be informed of agendas and performance data to be validated, confirmed, discussed, or observed during the visit.

4.4.1 Standard Site Visits

Standard site visits are prioritized based on factors such as:

- Monitoring level assigned at start of project
- Award amount
- Drawdown amount
- Designation as higher risk by WBO based on changes to the monitoring level (see Section 3.2.5)
- Unresolved issues and questions
- Project schedule
- Staff turnover, particularly among leadership

After a standard site visit, staff will draft a report that documents findings and conclusions, attaching supporting data. Where site visits identify or confirm significant issues, WBO may specify corrective actions to be taken by the subgrantee based on observations and conclusions drawn from the site visit. WBO may adjust monitoring levels based on a site visit.

4.4.2 Advanced Site Visits

Advanced site visits are conducted to address specific issues but otherwise follow the form and format of other site visits. Potential reasons for advanced site visits include:

- Challenges negotiating environmental or historic preservation rules
- Challenges working with government agencies, including Tribal Nations
- Allegations of waste, fraud, or abuse
- Concerns regarding the subgrantee's desk reviews or project meetings, including failure to file reports or questions regarding the contents of reports

4.5 Semi-Annual Reports

BEAD semi-annual reports (SAR) are submitted to NTIA by WBO twice per year, continuing the reporting cadence established during the planning phase. The reporting framework is deliberately designed to align with program milestones, with data collection requirements building cumulatively as the grant advances into full project buildout. This progressive approach will ensure that reporting requirements remain relevant to the current stage of implementation while tracking metrics established in earlier phases.

Subgrantees will be required to support WBO in meeting its obligation to provide high-level programmatic updates, including significant accomplishments, favorable developments or best practices, challenges encountered (such as problems, delays, high unit costs, or cost overruns), documentation of audits as required by Section 2.7, and goal setting for the subsequent reporting period. Each of these narrative elements must reference specific projects, ensuring that strategic reporting remains grounded in concrete implementation activities.

WBO will be required to report on service delivery and compliance metrics. WBO must report to NTIA on jobs created and retained by each subgrantee. Network reliability metrics will be tracked, and WBO will be required to identify any subgrantees failing to meet reliability requirements. Subscription data will also be captured, including total subscribers for BEAD-funded BSLs and network availability. These reports will be submitted no later than 30 calendar days after the reporting period in accordance with 2.CFR200.329.

BABA compliance will be verified through certification letters from manufacturers, which WBO must ensure are collected by subgrantees and made available to NTIA upon request (see Figure 5, below). Additionally, WBO must track and report on electronics waived under BABA requirements, including detailed information on manufacturer name, electronic category, harmonized system codes, product identifiers, descriptions, country of origin, and quantities.

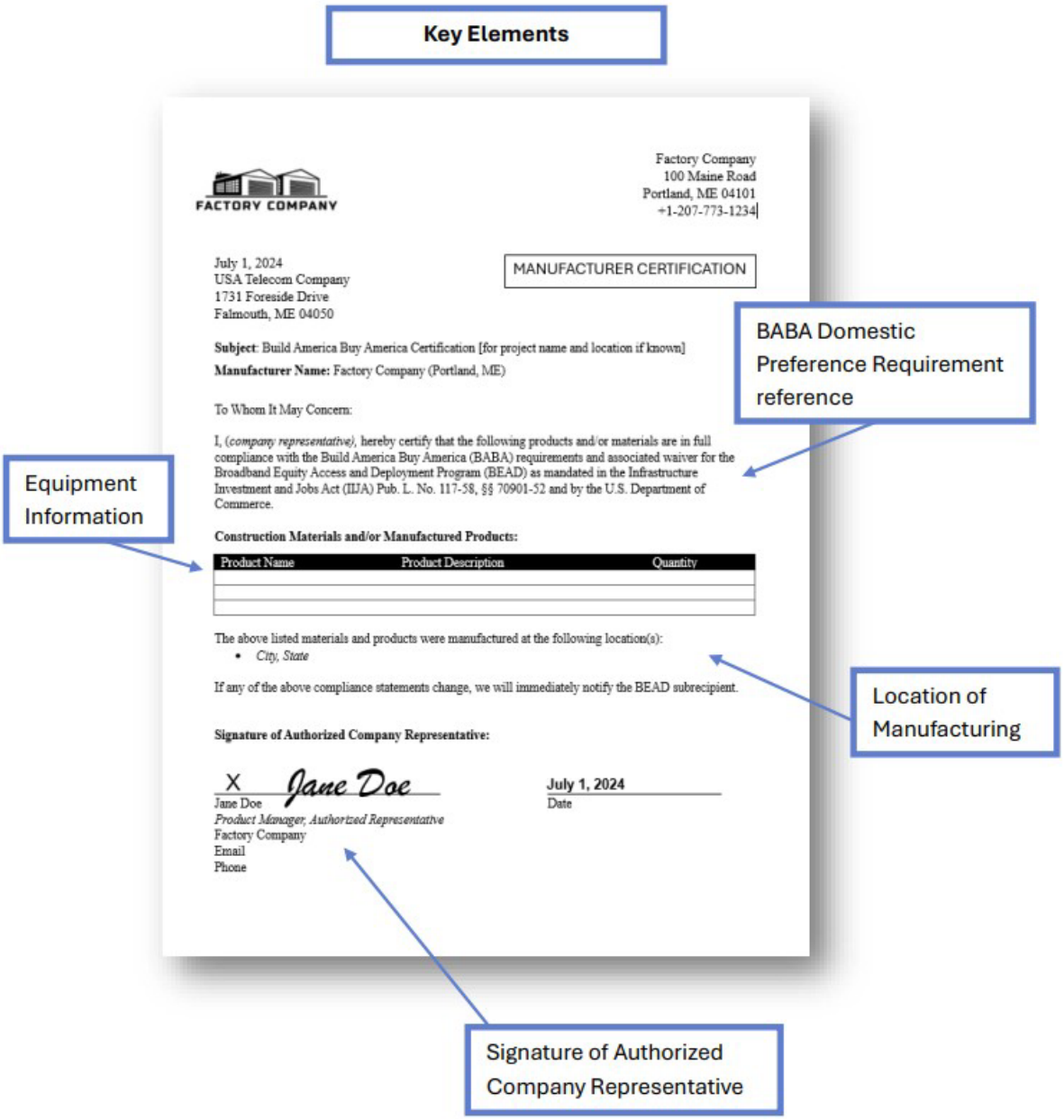
Deployment project tracking will include identification of eligible use categories, allocation of awarded funds toward each eligible use, milestone status reporting (not started, delayed, in progress, complete, or terminated), extension requests with reasons and expected delay lengths, and physical build progress measured in aerial and/or buried miles of fiber built, leased, or upgraded; towers built, leased, or upgraded; LEO capacity status; and LEO CPE delivery and status.

Financial tracking will encompass funds expended, budget and scope modifications, match dollars expended, reimbursements to date, and drawdowns to date.

Location-level reporting will align with Federal Communications Commission (FCC) data requirements to minimize reporting burden while ensuring comprehensive coverage tracking. For BSLs, reporting will include location ID, project ID, FCC Registration Number of the serving subgrantee, service designation (residential, business, or both), maximum advertised upload and download speeds, technology code using FCC Broadband Data Collection standards, and reason codes for locations that will not be served.

Accurate reporting is essential as it will protect both WBO and subgrantees during implementation by providing transparency regarding fund usage.

Figure 5: NTIA Sample Manufacturer Certification Letter (Source: NTIA)[42]



4.5.1 Deployment Project Eligible Use Percentage Allocation Reporting Requirements

Subgrantees will be required to track specific information about their BEAD-funded project at the project level, to assist in WBO's required semi-annual

[42] "Build America, Buy America Compliance and Documentation Requirements and Procedures," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BABA_Compliance_and_Reporting_Requirements.pdf.

reporting to NTIA. WBO will instruct each subgrantee on its individual requirements. The deployment project eligible use percentage allocation (EUPA) reporting requirements must be submitted in the EUPA template provided by WBO via the BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

As NTIA notes in its guidance, subgrantees must "[i]ndicate, for each project, an expected percentage allocation (i.e., 0.00-1.00) of the total awarded BEAD funds toward each Eligible Use as defined in the BEAD NOFO. The sum of all eight Eligible Use fields should equal 100% (1.00). You may indicate '0.00' for Eligible Use fields that are not applicable to the project."[43] NTIA's guidance also includes the following instructions:

"Eligible Use CSV Fields:

- (CSV column name = eupa_construction__c) 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.
- (CSV column name = eupa_leases__c) Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements.
- (CSV column name = eupa_wifi_infrastructure__c) Deployment of internet and Wi-Fi infrastructure within an eligible multi-family residential building.
- (CSV column name = eupa_engineering__c) Engineering design, permitting, and work related to environmental, historical and cultural reviews.
- (CSV column name = eupa_personnel__c) Personnel costs, including salaries and fringe benefits for staff and consultants providing services

[43] "BEAD Program Semi-Annual Performance (Technical) Report v2.0 Form," NTIA, October 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BEAD_Semi-Annual_Technical_Report_v2.0_Form.pdf. See: "FPFR Deployment Projects: SAR Deployment Projects CSV" (pp. 31-32).

directly connected to the implementation of the BEAD Program (such as project managers, program directors, and subject matter experts).

- (CSV column name = eupa_network_software__c) Network software upgrades, including, but not limited to, cybersecurity solutions.
- (CSV column name = eupa_training__c) Training for cybersecurity professionals who will be working on BEAD-funded networks. *[Note that WBO understands this requirement to have been removed by NTIA's BEAD Restructuring Policy Notice, issued June 2025 and will enter "0" as a response for each project.]*
- (CSV column name = eupa_workforce_dev__c) 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."[44] *[Note that WBO understands this requirement to have been removed by NTIA's BEAD Restructuring Policy Notice, issued June 2025 and will enter "0" as a response for each project.]*

4.6 Annual Reports

In addition to quarterly submissions, subgrantees will provide more comprehensive annual reports that synthesize progress over the full year and provide forward-looking projections. Annual reports will require financial documentation demonstrating subgrantees' proper fiscal management and compliance with federal cost principles. Additionally, audited financial statements will be due annually. These audited statements will provide independent verification that funds are being spent appropriately and that adequate financial controls exist.

The annual reporting cycle will require subgrantees to update their deployment timelines and milestone schedules. Projects will encounter adjustments during implementation, and these annual updates will ensure that WBO and NTIA hold subgrantees accountable to achievable commitments. Any significant deviation from original projections must be explained with supporting documentation and corrective action plans. Additional details on requirements for annual reports are expected from NTIA. WBO will update this section and inform subgrantees as more information becomes available.

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[44] "BEAD Program Semi-Annual Performance (Technical) Report v2.0 Form."

4.7 Closeout Reporting

When projects reach completion, subgrantees must submit comprehensive closeout reports documenting final outcomes and unobligated funds. Closeout reporting includes final and cumulative accounting of all expenditures, certification that all locations have been served as committed, and compilation of all location-level data into final deliverables. These closeout packages provide definitive records of the accomplishments of each BEAD investment.

The closeout process includes final field inspections and network acceptance testing to verify that infrastructure is fully operational and meets all technical requirements. In addition, subgrantees must document that all required certifications have been obtained, all subcontractor obligations have been fulfilled, and all equipment has been properly installed and activated.

Financial closeout requires reconciliation of all funding sources, return of unused BEAD funds, and certification that matching fund requirements were fully satisfied. WBO will review closeout submissions before authorizing final payments.

While NTIA has yet to publish BEAD-specific closeout guidance, NTIA's NIST Recipient Closeout Guidance[45] provides general grant closeout information for NTIA programs and is expected to be largely applicable to BEAD projects. Closeout generally covers multiple topic areas with a focus on financial, performance, property, and record retention documentation. Typically, performance reporting will follow the same template as the semi-annual report, capturing the requisite technical details confirming project completion and compliance with BEAD standards, including as-built GIS maps, network diagrams, and an inventory of deployed assets.

The same SF-425 template used for semi-annual reporting will be the final financial report in the closeout package. The final SF-425 is cumulative and should include all financial transactions that occurred during the life of the award, including any closeout costs. Subgrantees subject to federal interest requirements for equipment and real property purchased with BEAD funds

[45] "NIST Recipient Closeout Guidance: NTIA Grant Programs (for awards made prior to October 1, 2024)," NTIA, Version 1.1, April 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-04/ntia_oicg_recipient_closeout_guidance_4.11.25.pdf.

will submit tangible property documentation (e.g., SF-428, SF-429) to acknowledge the 10-year obligation for BEAD-funded infrastructure. Finally, 2 CFR § 200.334 requires that subgrantees must retain all records related to federal awards for at least three years after final payments and the award is closed out.

5 Accounting for Actuals and Project Match

The BEAD Program and 2 CFR § 200 require subgrantees to maintain rigorous project-specific accounting practices throughout project implementation to ensure subgrantees' compliance with federal requirements and proper documentation of both federal expenditures and matching contributions. Understanding how to properly account for actual costs and match is essential for successful project closeout and audit defense.

Subgrantees must track all project expenditures as they occur, recording actual costs incurred rather than budgeted or estimated amounts. This actual cost accounting serves as the foundation for all grant funding requests and compliance reporting. Every expenditure must be supported by source documentation such as invoices, payroll records, timesheets, and receipts that demonstrate that the cost was actually incurred and paid, was properly allocated to the BEAD project, and was allowable under federal cost principles.

The subgrantee's accounting system must be capable of tracking receipts and expenditures separately to ensure that each contract or grant is managed independently, preventing the comingling of grant reimbursements and expenses, and verifying that grants are not incurring duplicate costs. This typically requires establishing dedicated cost centers, project codes, or general ledger accounts by program. The system should capture sufficient detail to track costs by budget category (e.g., construction, labor, materials, equipment, professional services) to facilitate budget-to-actual comparisons and variance analysis during monitoring reviews.

Matching funds documented in the subgrantee agreement must be booked proportionally at the same general rate with federal payments. This proportional requirement has significant implications for cash flow management and project planning. Subgrantees must ensure they have adequate matching resources available throughout the entire project period, not just at strategic milestones. Organizations that plan to use in-kind contributions, such as volunteer labor or donated equipment, must carefully document these contributions as they occur and align them with corresponding federal drawdowns.

Matching contributions can take several forms, but all must meet federal cost principles, as outlined in 2 CFR § 200, and be directly related to the BEAD project. Cash match represents the most straightforward form, consisting of

the subgrantee's own funds, private investment, state or local government contributions, or other non-federal sources that are expended on eligible project activities. These expenditures must be tracked with the same rigor as federal expenditures and supported by equivalent source documentation.

In-kind match includes non-cash contributions such as donated labor, volunteer time valued at reasonable market rates, donated equipment or materials, and the value of space or facilities provided at no cost to the project. In-kind contributions require particularly careful documentation, including contemporaneous records of time donated, valuations based on comparable market rates or independent appraisals, and clear demonstration that the contribution was necessary for project completion. The proportional booking requirement means these in-kind contributions must be valued and recorded in sync with federal expenditures rather than accumulated and reported in bulk.

Third-party contributions, whether cash or in-kind, can serve as match if they meet specific criteria: they must be verifiable from the third party's records, not be paid by the federal government under another award, and be necessary to achieve project objectives. Letters of commitment from third parties must be obtained before contract execution and be updated throughout implementation to ensure promised contributions materialize as needed to maintain the proportional match requirement.

Subgrantees must submit financial reports during quarterly desk reviews that present actual expenditures compared to approved budgets. These reports must separately identify federal expenditures and match contributions, demonstrating that the proportional match requirement is being maintained. Significant variances between budgeted and actual costs must be explained, and budget modifications may be required if reallocations exceed the allowed threshold (typically 10 percent between budget categories). This reporting must be submitted via the Quarterly Report form in WBO's grant management system.

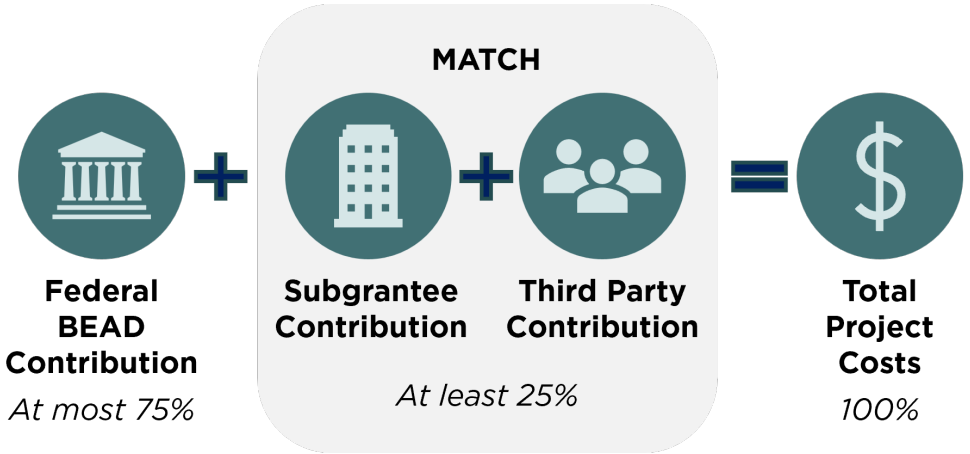
Subgrantees will be required to certify statements regarding the validity of the financial reports with each submission. Note that the subgrantee must seek pre-approval to transfer funds from one budget category to another

before expending any funds. Subgrantees should see 2 CFR § 200.308[46] for further information on budget revisions.

WBO will scrutinize the proportionality of match booking by examining financial reports, general ledger detail, and supporting documentation to verify that match has been consistently recorded in proportion to federal draws. If a subgrantee has drawn down 60 percent of their federal allocation, WBO expects to see documentation of 60 percent of the required match. Deviations from this proportional relationship will result in additional scrutiny and may indicate cash flow problems, inadequate planning, or compliance concerns. Note that match, whether cash or in-kind, is an obligation in the subgrantee's award. WBO will monitor to ensure that match is properly documented and proportional to federal payments and may take corrective action for noncompliance. For example, WBO may reduce federal reimbursements proportionally until the match requirement is met.

The graphic below illustrates the relationship between federal expenditures and matching contributions in the BEAD Program.

Figure 6: BEAD Project Match (Source: NTIA)[47]



[46] 2 CFR § 200.308, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.308.
[47] Adapted from "BEAD Subgrantee Qualifications and Match Evaluation Guide," NTIA, August 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-08/Subgrantee_Qualification_Evaluation_Guide.pdf.

6 Milestone Reimbursement Process

BEAD subgrantees will receive a fixed amount subaward, which "is a type of subgrant agreement where payments are based on meeting specific requirements of the federal award (e.g., performance and results), rather than actual costs incurred."[48] Accordingly, WBO will implement a milestone payment process for BEAD, releasing funds to each subgrantee only after the successful and verified completion of the predefined project milestones. Subgrantees must submit reimbursement requests through WBO's grant management system.

Please note: NTIA's BEAD guidance[49] and 2 CFR § 200 describe some fixed amount subaward payments as "reimbursements," but NTIA's guidance clarifies that these payments are for milestone achievement (e.g., "[c]osts must be reimbursed to subgrantees in accordance with either objectives met, units built, or total project complete"). For consistency with NTIA's terminology, this document uses "reimbursement" when referring to milestone-based payments made to BEAD subgrantees.

6.1 Overview and Documentation Requirements

The BEAD Program utilizes a milestone-based reimbursement structure for broadband deployment projects to ensure accountability, manage financial risk, and incentivize timely project completion while maintaining subgrantees' compliance with federal requirements.

During the deployment period, subgrantees will receive reimbursement for eligible project costs only after achieving specific, verifiable milestones that demonstrate measurable progress toward project completion and the delivery of reliable, affordable high-speed broadband service to BSLs. In addition, for LEO capacity projects, continued reimbursement installments during the extended period of performance will be subject to validated certification of continued compliance with BEAD service obligations for all project BSLs.

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[48] "Fixed Amount Subaward Overview," NTIA, June 2024, https://broadbandusa.ntia.gov/sites/default/files/2024-06/Fixed_Amount_Subaward_One_pager_2.pdf.

[49] "Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2023-12/BEAD_Policy_Notice_of_Part_200_Exceptions_Related_Issues.pdf.

This reimbursement methodology aligns payment with performance and protects the integrity of federal investments. It provides WBO with checkpoints to monitor project advancement, verify subgrantees' compliance with program requirements, and ensure that deployed infrastructure meets technical specifications and service standards prior to releasing funding.

The milestone reimbursement process requires subgrantees to submit comprehensive documentation demonstrating completion of each milestone, including supporting evidence such as engineering reports, construction photographs, network testing results, and financial records. The technical documentation requirements for each milestone are described in Appendix B (terrestrial projects) and Appendix C (LEO projects).

WBO does not require subgrantees to submit documentation for each cost incurred as part of its milestone reimbursement requests. However, all subgrantees must maintain comprehensive financial records, including receipts, invoices, records of matching funds, proof of payment, and supporting documentation for all project expenditures, in accordance with federal grant requirements. While the milestone-based payment structure modifies the timing and basis for fund reimbursement, it does not alter underlying documentation, audit, or compliance requirements.

Reimbursement of grant funds is based on WBO's review, validation, and acceptance of documentation evidencing milestone completion and project performance. WBO may request additional evidence to validate costs and progress against milestones, and to ensure subgrantees' compliance with federal, state, and programmatic requirements. WBO may also ask for additional testing, or may conduct its own testing, if it determines a project is at risk.

Subgrantees are expected to provide documentation, or facilitate the testing required, in a timely manner. The extent of the information request and testing will depend on the assessed risk to the project or pattern of noncompliance. Failure to respond in a timely manner to information, testing or site visit inspection requests may result in a range of enforcement actions, including increased monitoring, reporting, and withholding of reimbursements.

Subgrantees must also comply with quarterly and semi-annual post-award monitoring and reporting requirements to be eligible for reimbursement of grant funds. Each report shall describe progress made for each broadband

deployment project and/or other eligible activities carried out using the subgrant and the duration of the subgrant.

BEAD requires subgrantees to contribute matching funds to the project proportionally with drawdowns of public funds.[50] Subgrantees must record contributions of matching share to the project in a manner that complies with those requirements. (See Section 5.) WBO may, at any time, request documentation of the source, amount, and disposition of contributions of matching funds, as described in the subaward agreement or as may be required by NTIA.

6.2 Reimbursement Milestones for Terrestrial Projects

Each subgrantee will have a milestone-based budget and reimbursement schedule specific to each project. The five milestone categories help differentiate components of the project; each milestone corresponds to an allowable reimbursement percentage of the award amount:

Milestone Categories	Reimbursement
1. Project Plan	5%
2. Engineering & Permitting	10%
3. Pre-deployment	15%
4. Deployment	60%
5. Network Activation & Program Closeout	10%
Total	100%

The table below presents details on the milestone reimbursement percentages, based on verified evidence of progress, and the supporting documentation subgrantees will be required to submit with their reimbursement requests. See Appendix B for more details on the documentation requirements.

[50] "BEAD Subgrantee Qualifications and Match: Evaluation Guide," NTIA, August 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-08/Subgrantee_Qualification_Evaluation_Guide.pdf. See Appendix B: BEAD Match Primer.

Table 1: Reimbursement Milestones for Terrestrial Projects

Milestone Category	Milestone	Percentage of the Award Amount
Project Plan	Aggregated project plan with milestones and budget	5%
Engineering & Permitting	Completed engineering drawings and executed permits for 20% of project BSLs	2%
	Completed engineering drawings and executed permits for 40% of project BSLs	2%
	Completed engineering drawings and executed permits for 60% of project BSLs	2%
	Completed engineering drawings and executed permits for 80% of project BSLs	2%
	Completed engineering drawings and executed permits for 100% of project BSLs	2%
Pre-deployment	Documentation of binding agreements for required contracted labor and materials. Evidence of construction staging and material delivery for 20% of project BSLs	3%
	Documentation of binding agreements for required contracted labor and materials. Evidence of construction staging and material delivery for 40% of project BSLs	3%
	Documentation of binding agreements for required contracted labor and materials. Evidence of construction staging and material delivery for 60% of project BSLs	3%
	Documentation of binding agreements for required contracted labor and materials. Evidence of construction staging and material delivery for 80% of project BSLs	3%
	Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 100% of project BSLs	3%
Deployment	Completed placement of broadband infrastructure and associated as-built documentation for 20% of project BSLs	12%
	Completed placement of broadband infrastructure and associated as-built documentation for 40% of project BSLs	12%
	Completed placement of broadband infrastructure and associated as-built documentation for 60% of project BSLs	12%

Milestone Category	Milestone	Percentage of the Award Amount
	Completed placement of broadband infrastructure and associated as-built documentation for 80% of project BSLs	12%
	Completed placement of broadband infrastructure and associated as-built documentation for 100% of project BSLs	12%
Network Activation & Program Closeout	Completed network activation and submission of subscriber test data for 20% of project BSLs	2%
	Completed network activation and submission of subscriber test data for 40% of project BSLs	2%
	Completed network activation and submission of subscriber test data for 60% of project BSLs	2%
	Completed network activation and submission of subscriber test data for 80% of project BSLs	2%
	Completed network activation and submission of subscriber test data for 100% of project BSLs. Completion of all program closeout requirements	2%

Subgrantees may subdivide their projects into phases. Subgrantees can design these phases in the most optimal configuration to meet the milestone requirements or to enable deployment efficiencies with the understanding that the reimbursement metrics are based solely on BSL percentage completion, not specific route completions.

When developing and proposing project phasing to optimize their reimbursement schedules, subgrantees may also consider:

- Subdividing projects into phases to address long lead times to complete permitting, construction, or network activation due to factors like permitting authority agreements or build seasons
- Aligning project phasing with the subgrantee's internal operational factors such as cashflow or contractor payment schedules

Any proposed project phasing shall be identified and communicated to WBO during the contract agreement process and must be mutually agreed upon prior to completion of the Project Plan milestone and prior to submission for EHP review. The proposed phases must all include complete BSL locations, permitting requirements, and proposed infrastructure design plans for all milestones.

A reimbursement request must encompass a minimum number of BSLs to meet the 20%, 40%, 60%, 80%, and 100% reimbursement thresholds. *(For example, a request that includes 37% of project BSLs is only eligible for 20% reimbursement; however, a request that includes 62% of project BSLs is eligible for 60% reimbursement.)*

6.3 Reimbursement Milestones for LEO Projects

Funds may be reimbursed for low-Earth orbit (LEO) Capacity Subgrant awards upon completion of each milestone defined in the table below.

To request reimbursement for each milestone, the subgrantee is required to submit adequate supporting documentation (described in Appendix C) to WBO. Once WBO has reviewed and approved the submission, the request will be processed for payment, subject to the conditions specified in the subaward agreement.

Note that the BEAD Program requires subgrantees to contribute matching share to the project proportionally with drawdowns of public funds.[51] As a result, WBO expects the subgrantee to record contributions of matching share to the project in a manner that complies with those requirements. WBO may, at any time, request documentation of the source, amount, and disposition of contributions of matching share, as described in WBO's grant agreement or as may be required by NTIA.

Below, payments are structured into milestone-based reimbursements during the four-year deployment period, along with Semi-Annual Equal Installment reimbursements throughout the 10-year extended period of performance, aligning with Appendix B of NTIA's BEAD Restructuring Policy Notice.[52]

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[51] "BEAD Subgrantee Qualifications and Match Evaluation Guide," Appendix B: BEAD Match Primer, NTIA, August 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-08/Subgrantee_Qualification_Evaluation_Guide.pdf.
[52] "BEAD Restructuring Policy Notice," NTIA, June 2025, https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf.

Table 2: Reimbursement Schedule for LEO Projects

#	Milestone	Supporting Documentation	Reimbursement (Percentage of Award)

1	Project Plan[53]	• Project Plan that explains capacity deployment phases and timelines, including:
		  ○ To the extent relevant, the plan should integrate realistic NEPA and NHPA responsibilities and associated permitting components
		  ○ As relevant, validate alignment with the approved subgrant budget; if any changes or gaps are identified, those must be documented and approved by WBO in accordance with its grant management practices and the requirements of 2 CFR § 200
		• Certification in writing by the subgrantee's Authorized Organizational Representative
			3%

[53] The Project Plan, including schedule and deployment milestones, will be incorporated into WBO's monitoring and oversight plan for long-term oversight of the subgrantee and its subgrant. Should the subgrantee make, or should the situation require, future changes to the Project Plan, those changes must be submitted in writing by the subgrantee and reviewed and verified by WBO through an identical process, followed by similar adjustments to WBO's monitoring and oversight plan.

#	Milestone	Supporting Documentation	Reimbursement (Percentage of Award)
2	Environmental & Historic Preservation (EHP) (including NEPA and NHPA)	• Documentation/checklist, if needed, of Categorical Exclusions • If not categorically excluded due to construction activities: ○ EHP documentation, including evidence of consultations with regulatory, government, Tribal, and other agencies that may be required to assess, avoid, minimize, or mitigate potential negative impacts, for 50% of project BSLs • Final EHP no effect determination (or equivalent record of decision)	2%
3a	Capacity Verification – Availability [54]	• Certification that the subgrantee's LEO broadband service is available to 35% of eligible BSLs with sufficient capacity to meet BEAD Program requirements	10%
3 b		• Certification that the subgrantee's LEO broadband service is available to 65% of eligible BSLs with sufficient capacity to meet BEAD Program requirements	10%
3c		• Certification that the subgrantee's LEO broadband service is available to 100% of eligible BSLs with sufficient capacity to meet BEAD Program requirements	10%

[54] The subgrantee may not initiate any deployment or ground-disturbing construction activities until it receives written **Notice to Proceed with Deployment** from WBO. Notice to Proceed will not be made until the EHP process has been concluded and formally approved by WBO and NTIA. See Milestone 2.

#	Milestone	Supporting Documentation	Reimbursement (Percentage of Award)
4a	Capacity Verification – Take-Rate	• Certification of completed network activation and provision of service to 17.5% of the eligible BSLs (35% of the projected 50% take-rate) • Corresponding subscriber test data	5%
4b		• Certification of completed network activation and provision of service to 32.5% of the eligible BSLs (65% of the projected 50% take-rate) • Corresponding subscriber test data	5%
4c		• Certification of completed network activation and provision of service to 50% of the eligible BSLs (100% of the projected 50% take-rate) • Corresponding subscriber test data	5%

#	Milestone	Supporting Documentation	Reimbursement (Percentage of Award)
5	Semi-Annual Equal Installment Reimbursements[55]	• Certifications that the subgrantee: ○ Delivers service to subscribers at its eligible BSLs that meets BEAD performance requirements ○ Can "initiate broadband service within ten (10) business days of a request to any eligible BSL, with no charges or delays attributable to extension of the service" ○ Continues to connect any eligible BSLs for which service is requested "at no charge for equipment to end-user" ○ Continues to offer a Low Cost Service Offering (LCSO) to all eligible BSLs and publicize its availability widely	20 semi-annual reimbursements of 2.5% each[56]

6.4 WBO's Review and Payment Process

WBO will review all requests for reimbursement and related supporting documentation and will endeavor to review and approve as quickly as

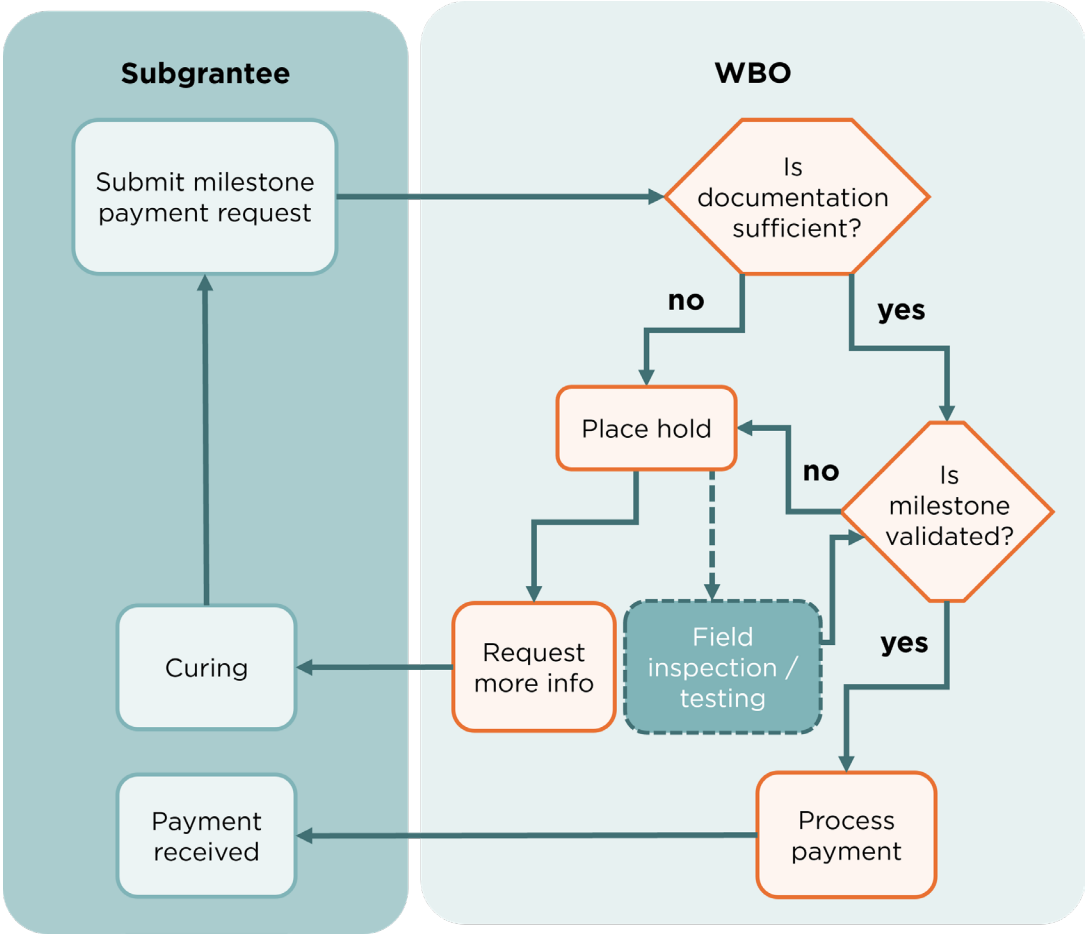
[55] Per NTIA's BEAD Restructuring Policy Notice, Appendix B: Low Earth Orbit Capacity Subgrants, "A recipient of a LEO Capacity Subgrant shall be deemed to have begun to provide service when it certifies to the Eligible Entity that the recipient can initiate broadband service within ten (10) business days of a request to any covered BSL in the project area, with no charges or delays attributable to extension of the service." ("BEAD Restructuring Policy Notice," NTIA, June 2025, https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf.)

[56] Semi-Annual Equal Installment Reimbursements will begin when the subgrantee provides the required certification and WBO has verified the supporting documentation. Reimbursements will be made twice annually, at six-month intervals, for the 10-year Period of Performance of the LEO Capacity Subgrant, so long as the subgrantee remains in compliance with the terms and conditions of the Agreement. While this reimbursement is set to at least 50% of the award, any funds tied to preceding milestones that were not reimbursed will be added to this post-deployment amount to be reimbursed in equal amounts over the extended period of performance.

possible. Reimbursement processing delays may occur due to missing or incorrect supporting documentation. No payment will be reimbursed until WBO verifies that all required milestone elements have been fully executed.

If WBO requires additional supporting documentation for a request for reimbursement, a hold will be placed until milestone achievement is verified. If WBO requests additional information, the subgrantee will have 7 business days to submit the information.

Figure 7: Reimbursement Process



WBO will review each reimbursement request to ensure milestones have been met. Depending on the requested evidence, WBO may also validate that costs are allowable according to the statutory and regulatory provisions of the BEAD Program guidance. WBO will verify:

- Required documentation substantiates completion of the milestone per the grant contract;

- The request is for eligible costs as detailed in Section 2.4 of this Program Guide;
- The claim is adequately supported by the subgrantee's records;
- The subgrantee attests that it has adequately reported the costs in its accounting records; and
- The subgrantee has adequately accounted for its match obligation and is tracking match proportionally with federal expenditures.

WBO will reimburse subgrantees after validating a complete and correct reimbursement request submission. Subgrantees will be notified when WBO has validated the submission. WBO will only begin to process reimbursements upon validation of complete and correct materials.

Payments to subgrantees will be compliant with NTIA's guidance on BEAD-enabled exceptions to the Uniform Guidance (2 CFR § 200).[57] Subgrantees' awards are subject to applicable federal performance, monitoring, and reporting requirements, including those set forth in 2 CFR § 200.201 and BEAD NOFO Sections IV.C.1.b and V.C.1.[58]

In addition, note the following milestone-specific processing issues:

- The Project Plan milestone reimbursement must be completed before WBO begins reviewing reimbursement materials submitted for the Engineering & Permitting milestone. Even if the subgrantee submits reimbursement documentation for a phase of the Engineering & Permitting milestone at the same time as the Project Plan milestone, the process for reviewing Engineering & Permitting materials does not start until after the Project Plan reimbursement is processed.
- Subgrantees may not initiate any deployment or ground-disturbing construction activities until the EHP process has been concluded and approved by NTIA and a Notice to Proceed has been issued by WBO.
- For the Network Activation & Program Closeout milestone, subgrantees will be required to coordinate with WBO to schedule and

[57] "Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2023-12/BEAD_Policy_Notice_of_Part_200_Exceptions_Related_Issues.pdf.
[58] "BEAD Notice of Funding Opportunity (NOFO)," NTIA, May 12, 2022, https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf.

conduct field inspection surveys. A completed field inspection survey shall be required as part of this reimbursement request submission.

6.5 Withholding of Milestone Payments and Funding Clawbacks

WBO has the right to dispute any request for reimbursement, invoice, or other supporting documentation and withhold payment of any disputed amount if WBO believes the documentation is inaccurate, incomplete, insufficient, or incorrect in any way. If WBO determines that only a portion of a reimbursement request is supported, it may approve partial payment and return the remainder of the request for revision. WBO's review may include technical or financial audits, and its decisions are final unless otherwise revised through a formal resolution process defined by WBO.

Noncompliance with subgrantee obligations, including not meeting agreed-upon milestones, may result in withholding funds for all milestones until identified issues have been remediated to WBO's satisfaction.

In case of default or other serious breaches of the project agreement, WBO may seek clawback of funding as directed by NTIA in accordance with BEAD Program requirements.

In the event the state is required to repay IIJA funds delegated to WBO as a result of a subgrantee's noncompliance with the terms and conditions of the BEAD subaward agreement or any applicable law, regulation, or guidance, WBO will have the right to claw back such repayments from the subgrantee in the amount attributable to the subgrantee's noncompliance without offset. To the extent permitted by law, WBO will provide the subgrantee with written notice of such noncompliance and allow the subgrantee an opportunity to correct or otherwise cure such noncompliance before clawback of funds.

WBO reserves all rights and remedies available under 2 CFR § 200 (particularly § 200.201(b)) in the event of non-performance.

6.6 Final Reimbursement Payment

Terrestrial subgrantees must submit a final reimbursement request prior to receiving final reimbursement payment. The final reimbursement request must identify any differences between the approved grant amount in the subaward agreement and the final reimbursement request. The subgrantee must explain the reasons for the differences and the impacts or changes to the project budget as a result of these differences, which will be subject to WBO's review. The subgrantee may not request reimbursement that exceeds the grant

amount specified in the subaward agreement or the most recently approved budget amendment to the subaward agreement.

Subgrantees must provide supporting documentation with the final reimbursement request, which will provide evidence of actual costs incurred for the project. WBO will reimburse grant funds only after reviewing the subgrantee's costs incurred, evidence of completion of the project, and compliance with program requirements. WBO will request any clarifying documentation needed to support costs claimed during the review process. Proof of payment may consist of cancelled check images, email confirmations, or bank statements showing the transaction by electronic funds transfer or by check. It is not necessary to provide the full bank statement so long as the date of the payment, amount of the draft that corresponds with the invoice amount, and posting date are visible.

Generally, costs incurred prior to the award are unallowable; however, an exception is made for fiber or other broadband materials and equipment acquired in advance of the award (e.g., stockpiled materials, materials on hand). The invoices and proof of payments should clearly support the valuation method for in-kind contributions (typically, the fair market value) allocated to the grant as properly evidenced in the subgrantee's accounting system. The valuation method must be approved by WBO and must be appropriately documented. In addition, such WBO-approved expenses and in-kind contributions must comply with BABA requirements.[59]

Funds which have been properly obligated by the end of the subaward term will have 120 days in which to be liquidated (expended). Except under extenuating circumstances, and as approved by WBO, no funds will be paid beyond the 120-day closeout period. Any funds remaining in the subaward after 120 days will revert to WBO.

[59] "Accelerating the Construction of BEAD Projects," NTIA, December 2024, https://broadbandusa.ntia.gov/sites/default/files/2025-08/BEAD_Acceleration_Best_Practices_08_2025.pdf.

7 Environmental and Historic Preservation Process and Requirements

As documented in the "General Terms and Conditions" for the Broadband Equity, Access, and Deployment (BEAD) Program, subgrantees are responsible for complying with all applicable environmental and historic preservation (EHP) requirements as a condition of their BEAD awards before any grant-funded implementation activities can be initiated.[60] NTIA will require comprehensive subgrantee documentation to determine the appropriate level of National Environmental Policy Act (NEPA)[61] analysis required for each BEAD-funded project, and then to ensure the analysis and any required consultations are satisfactorily conducted.[62]

Subgrantees will need to provide detailed project descriptions that include deployment procedures, potential impacts associated with those deployment procedures, and the photos and maps required to evaluate whether a Categorical Exclusion (CE), Environmental Assessment (EA), or Environmental Impact Statement (EIS) is necessary to determine potential impacts in compliance with NEPA, National Historic Preservation Act (NHPA) Section 106, and other relevant federal, state, and local regulations.[63] Additional subgrantee EHP milestone activities are illustrated in the figure below.

WBO is the joint lead agency alongside NTIA with responsibility for meeting NEPA obligations (including NHPA obligations) and for minimizing potential NEPA-related project delays in the state while implementing the BEAD Program. Accordingly, as described below, WBO will provide oversight and

[60] "General Terms and Conditions for NTIA BEAD Program Funds," NTIA, November 2025, https://broadbandusa.ntia.gov/sites/default/files/2026-01/BEAD_GTCs_11_18_2025.pdf.
[61] "Guidance on NTIA National Environmental Policy Act Compliance," NTIA, June 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-06/NTIA_NEPA_Procedures_June_2025.pdf.
[62] "Streamlined Environmental Review & Permitting for Broadband: A Roadmap," NTIA, November 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-11/NTIA_Streamlining_Environmental_Review_and_Permitting.pdf.
[63] "National Historic Preservation Act (NHPA) Consultation Process Fact Sheet," NTIA, April 2024, https://broadbandusa.ntia.gov/sites/default/files/2025-08/EHP_NHPA_Sect_106_Consultation_Process_Fact_Sheet_2025.pdf.

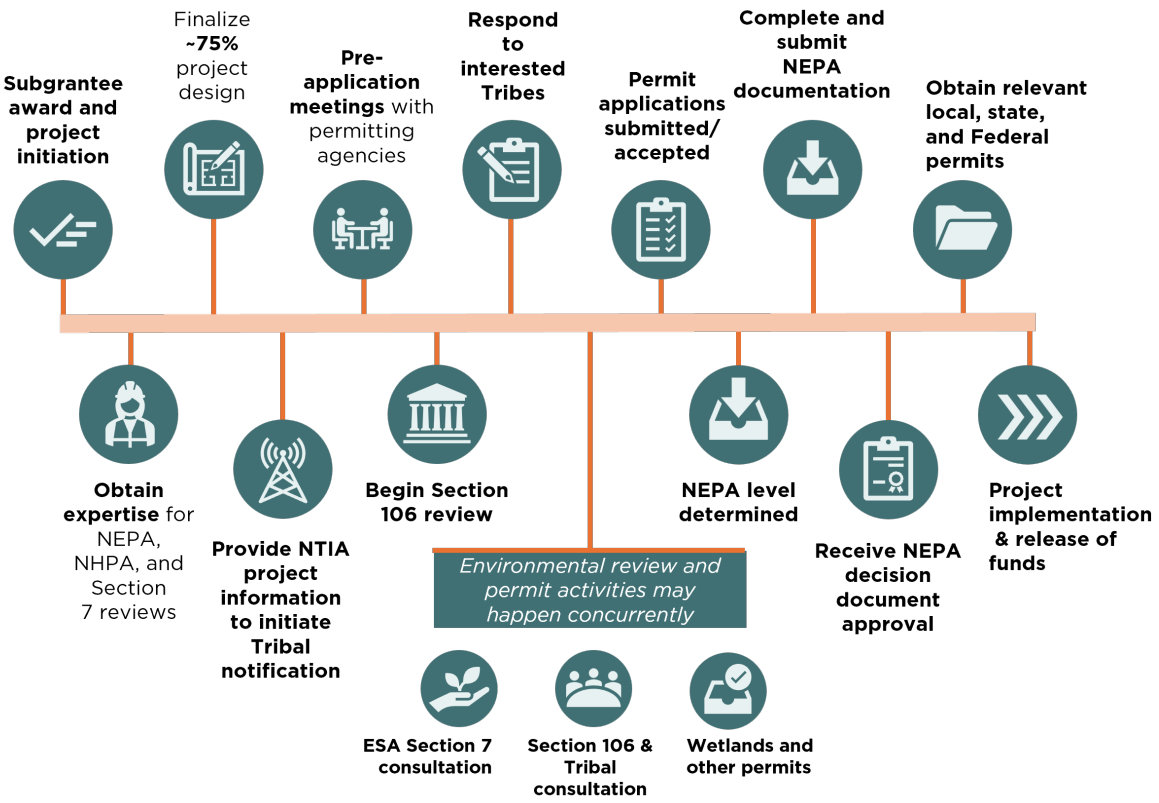
guidance to subgrantees to help them prepare for and achieve NEPA and NHPA compliance.[64]

Subgrantees are expected to play a proactive role in all EHP-related activities required for their projects. WBO's primary role is to provide supervision and administration of grant awards; subgrantees should not expect WBO to perform project-specific activities for subgrantees. Therefore, it is critical that subgrantees review and understand the EHP requirements of their BEAD awards.

Because the EHP process must be completed to WBO's and NTIA's satisfaction prior to any deployment activities, subgrantees are strongly encouraged to retain the services of an experienced and appropriately credentialed firm with experience in environmental compliance and impact analysis, and in the planning, research, and review of historic properties and cultural resources.

[64] "NEPA for BEAD: Smart Start Part II: How to Approach and Implement BEAD Subgrant Permitting Conditions," NTIA, November 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BEAD_NEPA_Smart_Start_II_BEAD_Subgrant_Permitting_Conditions.pdf.

Figure 8: Subgrantee Milestone Schedule Considerations (Source: NTIA)[65]



Appendix D includes links to BEAD EHP resources and general NEPA/EHP guidance for subgrantees.

7.1 NTIA's EHP Compliance Tools

Both WBO and subgrantees will use tools administered by NTIA throughout the EHP compliance process. Subgrantees and their EHP consultants should familiarize themselves with these NTIA tools and procedures.

Subgrantee tools: As a first step toward understanding the BEAD Program's environmental, historic preservation, and permitting requirements, subgrantees should review NTIA's ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package.[66]

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[65] "NEPA for BEAD: Milestone Schedule & NEPA Timeline," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA_for_BEAD_Milestone_Schedule_NEPA_Timeline.pdf.
[66] ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package, https://www.arcgis.com/home/item.html?id=37fa42c6313e4bdb9d8a9c05d2624891.

NTIA created APPEIT to help subgrantees with permitting planning and environmental review preparation efforts. The tool includes access to multiple maps from publicly available sources, including federal review, permitting, and resource agencies. The tool can be used to assist with preliminary identification of areas that may require permits or planning—and, by considering NTIA best practices for mitigation in engineering and route designs, can help subgrantees avoid potentially significant impacts to environmental resources subject to NEPA and other statutory requirements.

WBO's tools: WBO will also use an NTIA compliance tool throughout these processes—the Environmental Screening and Permitting Tracking Tool (ESAPTT).[67]

NTIA developed ESAPTT to support paperless environmental reviews and expedite NEPA approvals for the BEAD Program. ESAPTT includes Environmental Screening Questionnaires that assist in identifying projects that can be categorically excluded, which would then determine the EHP-related activities the subgrantee must engage in. In addition, ESAPTT includes Permitting Tracking Dashboards to help validate, monitor, and manage resource and right-of-way permits and supports the escalation of permitting challenges to NTIA so WBO can assist subgrantees with resolving complex permit delays.[68]

WBO will use the ESAPTT to screen projects for environmental effects; transmit and maintain NEPA documents; and track subgrantee permitting requirements and timelines to support NTIA review and approval of final NEPA decisions.

WBO will use details that subgrantees submitted in their applications, including each project's broadband serviceable locations (BSL), preliminary route maps, and facility locations, to develop the state's ESAPTT submissions. WBO will also require subgrantees to submit project details in WBO's BEAD Subgrantee EHP Questionnaire (Appendix F).

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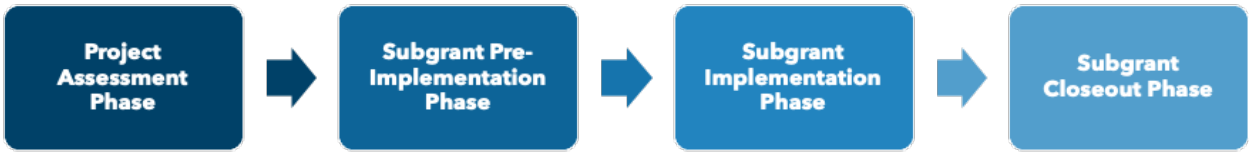
[67] "Environmental Screening and Permitting Tracking Tool (ESAPTT) Overview," NTIA, June 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-06/ESAPTT_Overview.pdf.
[68] "Frequently Asked Questions (FAQ): NEPA for BEAD Version 2.0," NTIA, July 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-07/NEPA_for_BEAD_FAQs_v2.pdf.

7.2 BEAD Program EHP Compliance Requirements for Subgrantees and the State

To meet its joint lead responsibilities, WBO will conduct its BEAD EHP oversight and compliance responsibilities in a manner that will implement the state's obligations while streamlining subgrantee activities. Subgrantees will be required to meet obligations (described below) in each of the four phases of this compliance roadmap:



7.2.1 Project Assessment Phase

During the project assessment phase, WBO will evaluate each awarded project to understand the project's EHP requirements. WBO will begin by analyzing the project plans and designs that subgrantees submitted during the BEAD application process to identify potential environmental and cultural resources impacts.

In this phase, subgrantees will be required to complete a BEAD Subgrantee EHP Questionnaire (see Appendix F), which WBO will then analyze to determine the project's EHP evaluation risk factors (primarily time, cost, and complexity) and develop a roadmap to guide the project's EHP evaluation.

This effort will also enable WBO to develop an inventory of environmental and permitting activities required for each project, which WBO will use in subsequent EHP compliance phases to guide subgrantees, monitor their progress, and intervene where necessary to drive project success.

7.2.1.1 Subgrantee Requirements

- Review NTIA's APPEIT Project Package to understand environmental, historic preservation, and permitting requirements.[69]

[69] ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package, https://www.arcgis.com/home/item.html?id=37fa42c6313e4bdb9d8a9c05d2624891.

- Review the ESAPTT Environmental Screening Questionnaire requirements to identify and be prepared to provide the project details that WBO will require for its ESAPTT submission.[70]
- Complete the BEAD Subgrantee EHP Questionnaire (see Appendix F) for each project.
    - Note whether construction will take place on any federal lands or cross any federally managed waterways that will require consultation with federal agencies (e.g., Bureau of Land Management (BLM), Bureau of Reclamation (BOR), U.S. Army Corps of Engineers (USACE)); this is a key gatekeeping exercise that will determine whether the project will need to incorporate those requirements into the compliance process.
    - Use the Questionnaire as a guide for EHP compliance planning; identify the EHP requirements specific to the project and identify issues to discuss with the EHP experts engaged in the subgrant pre-implementation phase (see below).
- Respond to WBO's information requests as necessary.

7.2.1.2 The State's Activities

- Assess the applicability of NTIA EHP guidance, including:
    - NEPA Categorical Exclusions.[71]
    - Advisory Council on Historic Preservation (ACHP) *Program Comment for Communications Projects on Federal Lands and Property (Synopsis of 2024 Update).*[72]
    - Advisory Council on Historic Preservation (ACHP) *Program Comment for Federal Communications Projects.*[73]

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[70] "Appendix: ESAPTT Environmental Screening Questionnaire," NEPA for BEAD Frequently Asked Questions v2.0, NTIA, https://broadbandusa.ntia.gov/sites/default/files/2025-07/NEPA_for_BEAD_FAQs_v2.pdf.
[71] "Notice of Newly Established NEPA Categorical Exclusions," NTIA, April 2, 2024, https://broadbandusa.ntia.gov/funding-programs/policies-waivers/Notice_of_Newly_Established_NEPA_Categorical_Exclusions.
[72] "Program Comment for Communications Projects on Federal Lands and Property (2024 Update)," Advisory Council on Historic Preservation, https://www.achp.gov/digital-library-section-106-landing/program-comment-federal-communications-projects.
[73] "Program Comment for Federal Communications Projects," Advisory Council on Historic Preservation, https://broadbandusa.ntia.gov/technical-assistance/The_Advisory_Council_on_Historic_Preservation.

- Evaluate federal and Tribal consultation and permitting requirements.
- Evaluate historic properties and SHPO requirements.
- Assess other risk factors impacting EHP and permitting.
- Evaluate subgrantees' proposed deployment methodologies.
- Use GIS to assess project areas for potential impacts to federal lands, Tribal lands, and known biological, historic, cultural, and other resources.
- Categorize potential EHP compliance risk for each awarded project based on complexity of consultations, known environmental and cultural resources, and other findings.
- Distribute the BEAD Subgrantee EHP Questionnaire (Appendix F) to subgrantees to gather required information.
- Develop other subgrantee information requests, as needed.
- Prepare a roadmap for EHP analysis of each project.

7.2.2 Subgrant Pre-Implementation Phase: NEPA and NHPA

During the subgrant pre-implementation phase, prior to subgrantees engaging in any deployment activities, WBO must ensure that the potential NEPA and NHPA impacts of each subgrant are fully evaluated. In this phase, subgrantees are responsible for performing the evaluations.

Subgrantees are required to engage NEPA and cultural resources experts to perform the evaluations, and the related costs are allowable under their subgrants. It is the state's responsibility to ensure that the analysis and requisite consultations are performed according to applicable federal regulations and NTIA's guidance.

WBO is also required to submit subgrantee analysis, consultation documents, and concurrences to NTIA for evaluation by NTIA's EHP experts, via ESAPTT. WBO will follow NTIA's step-by-step guidance to prepare and submit information in the ESAPTT.

First, WBO will coordinate with the subgrantees to receive the requisite project maps, field work photos, and detailed project descriptions; WBO will

review and upload these materials to the ESAPTT. [74] Then NTIA will initiate the Tribal Notification process and provide WBO with a list of federally recognized Tribes with interest in the project area. WBO or its delegate will engage interested Tribes to identify potential impacts to areas of Tribal significance.

Next, WBO will complete the Categorical Exclusion (CE) questionnaire in ESAPTT to evaluate the project's scope; identify potentially applicable CEs; select the CE(s) that apply; and confirm that the project qualifies. In addition, WBO will complete the Extraordinary Circumstances (EC) questionnaire in ESAPTT to determine whether any environmentally sensitive resources (e.g., endangered species or historic properties) are present; upload documentation directly through ESAPTT; and indicate mitigation commitments to avoid potentially significant impacts.

To help facilitate timely clearance, WBO will require that the subgrantee provides a milestone schedule that identifies specific deadlines and describes how the subgrantee proposes to meet these timing requirements including, as required, the completion of consultations, securing requisite permitting, the completion of NEPA and NHPA Section 106 reviews, and the submission of Environmental Assessments (EA) or Environmental Impact Statements (EIS).[75]

WBO will help subgrantees develop a detailed project description that includes all environmental aspects and expected impacts of the project, as well as photos and maps.

In addition, as described below, the subgrantee is responsible for submitting (and WBO will validate) the following, as applicable:

1. Ground-level and aerial photos of the proposed project area and project plan drawings;

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[74] "Sample Project Descriptions and Maps for BEAD Environmental and Historic Preservation (EHP) Review,"
NTIA, January 2026, https://broadbandusa.ntia.gov/sites/default/files/2026-01/DOC_NTIA_Sample_ESAPTT_Project_Maps_and_Descriptions_01_26.pdf.
[75] "Program Comment for Federal Communications Projects," Advisory Council on Historic Preservation, https://broadbandusa.ntia.gov/technical-assistance/The_Advisory_Council_on_Historic_Preservation.

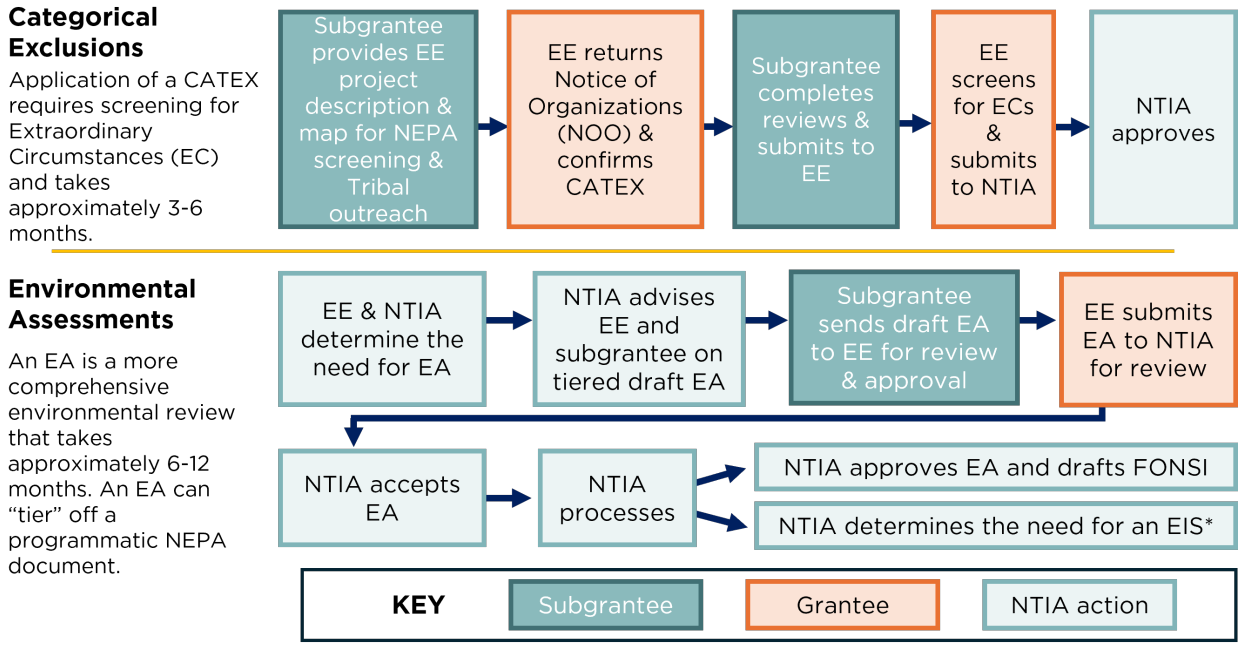
2. Floodplain map from the Federal Emergency Management Agency (FEMA) Map Service Center with the project overlain to show if and where the project falls in the flood zone;
3. Wetlands map from the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory with the project overlain to show if the project will impact wetlands or waterways and including buffer zones;
4. Initial consultation with State Historic Preservation Officers (SHPO) or Tribal Historic Preservation Officers (THPO), including a listing of any historic or archaeological resources within the vicinity of the construction activities;
5. Initial consultation with the USFWS to determine whether there are threatened or endangered species or critical habitat in the vicinity of the project; and
6. Initial plans for assessment of potential climate risks impacting the proposed project, and mitigation actions (i.e., design changes, method of construction, or other) the subgrantee is considering.

Once NTIA approves the analysis and documentation for each project, it will make the final determination—in partnership with NIST—that authorizes project deployment activities to commence. WBO will synchronize environmental review and permitting processes, to the extent practicable. For example, environmental reviews and permit activities may happen concurrently, while some federal land and resource management agencies (e.g., Bureau of Indian Affairs (BIA), Forest Service) may require the completion of NEPA before permits are issued.

The graphic below presents an overview of the levels of NEPA review required for the BEAD Program. As NTIA notes in its guidance, "NEPA establishes three levels of environmental review for potential projects: Categorical Exclusion (CATEX), Environmental Assessment (EA), and Environmental Impact Statement (EIS). The potential significance of impacts informs the level of review, and time and resource requirements vary for

each." [76] (The abbreviation "EE," for Eligible Entity, refers to WBO as the BEAD Program grantee.)

Figure 9: Levels of NEPA Review (Source: NTIA)[77]



*Note: Broadband deployments do not typically trigger an EIS, which can take 12-24 months to complete.

7.2.2.1 Subgrantee Requirements

- Engage NEPA experts to:
  - Perform NEPA analysis and fieldwork.
  - Support consultations.
  - Develop documentation in accordance with consultation requirements.
  - Submit and revise documentation as needed.
  - Support mitigation planning.
- Engage cultural resources experts to:

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[76] "NEPA for BEAD: Milestone Schedule & NEPA Timeline," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA_for_BEAD_Milestone_Schedule_NEPA_Timeline.pdf.
[77] "NEPA for BEAD: Milestone Schedule & NEPA Timeline," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA_for_BEAD_Milestone_Schedule_NEPA_Timeline.pdf.

  - Engage in all consultations.
  - Perform analysis and fieldwork.
  - Develop documentation in accordance with consultation requirements.
  - Submit and revise documentation, as needed.
  - Support mitigation planning.
- Submit all data required to enable WBO to complete the Environmental Screening Questionnaire requirements in the ESAPTT, including:
  - Detailed project description.
  - Route maps.
  - Deployment methodology.
  - Photos of field work.
- Assess the completed BEAD Subgrantee EHP Questionnaire (Appendix F) and other research to identify any extraordinary circumstances that could preclude a Categorical Exclusion and trigger additional NEPA requirements.
  - Verify whether the proposed action will occur within an environmentally sensitive or unique geographic area. If applicable, provide a map and supporting details to explain the relationship to the project.
  - Submit the U.S. Fish & Wildlife Services (USFWS) Information for Planning and Consultation (IPaC)[78] and Endangered Species Act Section 7 consultation Information and/or Essential Fish Habitat (EFH) Assessment Report and National Marine Fisheries Services (NMFS) EFH data to verify whether the proposed action will adversely impact Endangered or Threatened species or have an adverse effect on designated Critical Habitats.[79] If applicable, submit supporting documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.

[78] "Information for Planning Consultation (IPaC)," U.S. Fish & Wildlife Service, https://ipac.ecosphere.fws.gov/.
[79] "EFH Mapper," NOAA Fisheries, https://www.habitat.noaa.gov/apps/efhmapper/.

- Verify whether the proposed action will adversely impact protected migratory birds or their habitats through coordination with the USFWS Migratory Bird Program.[80] If applicable, submit supporting documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.
- Verify whether the proposed action will adversely affect historic, archeological, or cultural sites, including Native American Traditional Properties and properties listed or eligible for listing on the National Register of Historic Places.[81] Confirm whether a Program Comment for Federal Communications Project,[82] Duplicative Wireless Review Program Comment for towers,[83] or Programmatic Agreement or Memorandum of Agreement was executed. Provide Section 106 documentation and a State Historic Preservation Office (SHPO) concurrence letter. If applicable, submit supporting documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.
- Verify whether the proposed action will restrict access to and ceremonial use of Indian sacred sites or adversely affect the physical integrity of sacred sites. If applicable, provide any relevant documentation or additional explanation.
- Verify whether the proposed action will occur within or involve significant changes to a floodplain;[84] involve significant changes or effects on waterbodies or wetlands (including submarine or underwater cable);[85] or involve significant changes or effects on

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[80] "Migratory Birds," U.S. Fish & Wildlife Service, https://www.fws.gov/program/migratory-birds.
[81] National Register of Historic Places," U.S. National Park Service, https://www.nps.gov/subjects/nationalregister/index.htm.
[82] "Program Comment for Communications Projects on Federal Lands and Property (2024 Update)," Advisory Council on Historic Preservation, https://www.achp.gov/digital-library-section-106-landing/program-comment-federal-communications-projects.
[83] "Program Comment to Avoid Duplicative Reviews for Wireless Communications Facilities Construction and Modification," Advisory Council on Historic Preservation, July 31, 2020, https://www.achp.gov/digital-library-section-106-landing/program-comment-avoid-duplicative-reviews-wireless.
[84] "FEMA Flood Map Service Center," FEMA, https://msc.fema.gov/portal/home.
[85] "National Wetlands Inventory," U.S. Fish & Wildlife Service, https://www.fws.gov/program/national-wetlands-inventory.

water quality, sole source aquifers, or public water supplies.[86] If applicable, submit supporting maps and documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.

- Verify whether the proposed action will have any connection to hazardous waste, including the non-permitted generation, transportation, treatment, storage, or disposal of substances hazardous to human health.[87] If applicable, provide relevant documentation, maps of known soil/water contamination, and/or relevant plans.
- Verify whether human exposure to ionizing or non-ionizing radiation in excess of Federal Communications Commission (FCC) standards may occur.[88] If applicable, provide relevant documentation, including equipment specification sheets.
- Verify whether the proposed action is controversial due to unproven technology, uncertain or unique environmental effects, disagreement about the size, nature, or effect on the environment. If applicable, provide any relevant documentation or additional explanation.
- Verify whether the proposed action may violate a federal, Tribal, state, or local law, regulation, policy, or requirement imposed for the protection of the environment. If applicable, provide any relevant documentation or additional information.

The graphic below presents an overview of the federal permitting agency application process. As NTIA notes in its guidance, "[s]ubgrantee schedules should reflect the typical milestones associated with federal broadband deployment permits (i.e., right-of-way permits), including pre-application meeting, draft application review, and resubmission."[89]

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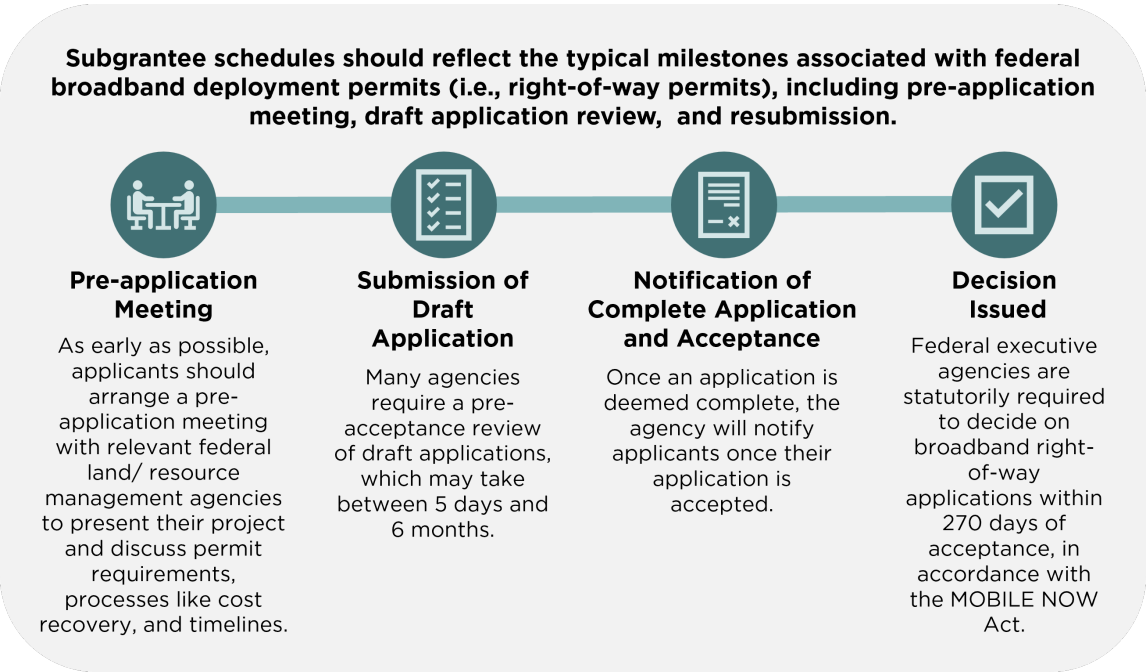
[86] "Drinking Water Regulations," U.S. EPA, https://www.epa.gov/dwreginfo/drinking-water-regulations.

[87] "Links to Hazardous Waste Programs and U.S. State Environmental Agencies," U.S. EPA, https://www.epa.gov/hwgenerators/links-hazardous-waste-programs-and-us-state-environmental-agencies.

[88] "Radio Frequency Safety," Federal Communications Commission, https://www.fcc.gov/general/radio-frequency-safety-0.

[89] "NEPA for BEAD: Milestone Schedule & NEPA Timeline," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA_for_BEAD_Milestone_Schedule_NEPA_Timeline.pdf.

Figure 10: Federal Permitting Agency Application Process[90]



7.2.2.2 The State's Activities

- NEPA activities:
  - Coordinate with NTIA to determine the appropriate level of NEPA analysis for each project and oversee the analysis.
    - Consult with state departments (e.g., Environmental Quality) on any state regulations or environmental restrictions in the project area.
  - Coordinate with NTIA to determine the required NEPA consultations for each project and oversee the consultations.
    - NTIA must review and approve the level of NEPA analysis, sufficiency, documentation, and outcome – such as a "no effect" determination or other appropriate go-forward decision (with mitigation, if applicable).

[90] "NEPA for BEAD: Milestone Schedule & NEPA Timeline," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA_for_BEAD_Milestone_Schedule_NEPA_Timeline.pdf.

        - NTIA and the National Institute of Standards and Technology (NIST) must address existing, new, or modified specific award conditions (SAC).
    - As applicable, review subgrantee submitted data to validate whether any extraordinary circumstances could preclude the application of a Categorical Exclusion and trigger additional NEPA requirements.
    - Identify any biological or environmental resources near proposed deployment areas.
    - Finalize the NEPA roadmap for the project.[91]
    - Gain NTIA concurrence with the NEPA roadmap.
    - Oversee analysis and deliver guidance/technical assistance to subgrantees.
- NHPA activities:
    - Coordinate with NTIA to determine the appropriate level of NHPA and cultural resources analysis and oversee the analysis.
    - Coordinate with NTIA to determine the required NHPA and cultural resources consultations and oversee the consultations.
        - Identify known historic and cultural resources near proposed deployment areas.
    - Evaluate the applicability of updated Program Comment.
    - Finalize the NHPA roadmap for the project, including necessary consultations.
    - Gain NTIA concurrence with the NHPA roadmap.
    - Oversee all consultations (SHPO, Tribal, federal).
    - Oversee analysis and deliver guidance/technical assistance to subgrantees.

[91] Note that the roadmap may change based on information gathered during the analysis itself. For example, should the consultation with the U.S. Fish & Wildlife Service (USFWS) determine that specific investigation is required to assess potential impacts to a migratory endangered species, those USFWS requirements would be added to the scope of the analysis.

7.2.3 Subgrant Implementation Phase

During the subgrant implementation phase, WBO will oversee subgrantee project deployment activities.

7.2.3.1 Subgrantee Requirements

- Implement awards in a manner compliant with all terms and conditions, including EHP requirements, SACs, and mitigation requirements.
- Provide regular reports and updates to WBO and other stakeholders, as requested or required by WBO or a SAC.
- Participate in site visits, desk reviews, and field inspections upon request.
- Identify scope changes, route changes, or EHP issues and immediately alert WBO.
- Provide documents, maps, field notes, or other materials upon request.

7.2.3.2 The State's Activities

- Monitor ongoing NEPA/NHPA compliance, including any SACs and mitigation activities required as a result of EHP analysis.
- Identify and, in partnership with subgrantees and NTIA, address any changes to scope (including route deviations not previously analyzed).
- Conduct monitoring and oversight, including site visits and desk reviews; incorporate EHP oversight into other monitoring activities.
- Note any EHP mitigation requirements defined during the pre-implementation phase, where applicable (e.g., Tribal monitors, seasonal deployment prohibitions) and monitor to ensure subgrantee compliance.
- Analyze any changes to scope or route, per NTIA-approved procedures.[92]
- Oversee implementation and deliver guidance / technical assistance to subgrantees as needed.

[92] NTIA has not defined a formal route change procedure for BEAD. However, NTIA has implemented an expedited review process for project route changes under NTIA's Middle Mile Grant (MMG) program, and a similar process likely will be established for BEAD.

7.2.4 Subgrant Closeout Phase

Project closeout will be the final step in the grant lifecycle. As of this writing, NTIA has not issued any closeout requirements specific to EHP. WBO will closely track NTIA guidance on semi-annual and closeout reporting requirements, as well as any future SACs placed on the project. WBO will communicate with subgrantees about reporting or compliance activities required to close out the BEAD Program.

Appendix A: Subgrantee Testing Requirements

Subgrantees will conduct technical testing in alignment with NTIA's performance measurement standards for the BEAD Program—which are designed to ensure that federally funded networks deliver reliable, high-speed internet access throughout the United States. NTIA's *Performance Measures for BEAD Last-Mile Networks*[93] provides guidance for subgrantees on validating compliance with speed, latency, and reliability requirements for last-mile broadband deployment projects.

BEAD-funded networks must meet three core technical standards:

1. Speed requirements of at least 100 Mbps download and 20 Mbps upload for broadband serviceable locations and 1 Gbps symmetrical for community anchor institutions;
2. Latency standards requiring that 95 percent of round-trip measurements fall at or below 100 milliseconds; and
3. Reliability standards limiting network outages to no more than 48 hours on average over any 365-day period (99.45% uptime), excluding natural disasters, force majeure events, and publicized, scheduled maintenance.

To comply with speed standards, providers must demonstrate that 80 percent of download measurements meet or exceed 80 percent of the required download speed, and 80 percent of upload measurements meet or exceed 80 percent of the required upload speed—for example, for 100/20 Mbps service, 80 percent of tests must achieve at least 80/16 Mbps.

Testing requirements are based on sample sizes determined by the number of active subscribers: providers with 50 or fewer active subscribers must test five locations; those with 51-500 subscribers must test at least 10 percent of locations; and those with more than 500 subscribers must test 50 locations. Providers must create separate sample sets for each technology type (using FCC technology codes), and each committed speed tier they offer within each state or territory.

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[93] "Broadband Equity, Access, and Deployment (BEAD) Program: Performance Measures for BEAD Last-Mile Networks," NTIA, September 19, 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-09/Performance_Measures_Policy_Notice.pdf.

Testing must be conducted annually during the period of performance for one week between 6:00 PM and 12:00 AM local time each day, with test subjects randomly selected from active subscribers to ensure providers cannot selectively choose locations likely to perform best. Sample sets are drawn from locations reported to the National Broadband Map with an as-of date seven months prior to the first semi-annual report due date of the calendar year.

The testing methodology allows providers to use built-in capabilities of customer premises equipment such as optical network terminals or residential gateways, or to deploy dedicated measurement devices at subscriber locations, with testing conducted from customer premises to FCC-designated internet exchange points. Speed tests require a minimum of one test per hour in each direction (download and upload) of at least 15 seconds duration, with providers permitted to defer tests for one minute if consumer application traffic exceeds 10 percent of the committed speed tier.

Latency testing requires a minimum of one test per minute during testing hours (60 tests per hour), and providers must record all observed latency measurements including lost packet tests, which count as discrete tests not meeting the standard. Critical requirements prohibit prioritization of test traffic over regular customer traffic, editing or exclusion of test measurements, and manipulation of random test subject selection.

Subgrantees must submit detailed per-location test results to WBO; document their testing methodology, standards, and parameters used (including any changes from previous submissions); provide official certification of accuracy from a corporate officer with supervisory and budgetary authority over network operations; and report non-compliance (if applicable) within 15 days of completing measurements or failing to meet availability benchmarks.

Subgrantees must publish aggregate testing results on their network management practices webpage and retain measurement data for inspection throughout the period of performance. Data files must follow Universal Service Administrative Company (USAC) CSV formatting specifications, with separate files submitted for each technology and committed speed tier. Eligible Entities must include summarized performance outcomes in their first BEAD semi-annual report of the calendar year and again prior to subgrant closeout and may withhold final payments until performance testing data has been submitted.

Subgrantees are deemed non-compliant if they fail to meet any of the four thresholds (download speed, upload speed, latency, or availability) for any applicable speed tier and technology, use non-compliant testing methodology, fail to report measurement results on time, or fail to comply with transparency requirements.

WBO details corrective actions in subgrantee agreements for non-compliance findings (such as more frequent testing) and establishes remediation processes to bring subgrantees into compliance in alignment with requirements specified in the NOFO[94] and NTIA's *Performance Measures for BEAD Last-Mile Networks Policy Notice.*[95] The testing obligations apply only during the period of performance, though network performance standards continue throughout the Federal Interest Period and the Extended Period of Performance. The framework balances rigorous oversight of federal broadband investments with practical compliance requirements by leveraging existing industry testing infrastructure and methodologies.

[94] "BEAD Notice of Funding Opportunity (NOFO)," NTIA, May 12, 2022, https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf.
[95] "Performance Measures for BEAD Last-Mile Networks Policy Notice," NTIA, September 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-09/Performance_Measures_Policy_Notice.pdf.

Appendix B: Milestone Documentation Requirements for Terrestrial Projects

Documentation to be submitted upon contract award and each milestone reimbursement request are identified in the following table and described in detail below. Subgrantees should note that this guide is not binding, exhaustive, or final, and it may be updated by WBO at any time, as guidance is updated. The BEAD Program is subject to both federal and state law and guidance, and it is the responsibility of BEAD subgrantees to comply with all applicable laws and guidance for the program.

Table 3: Terrestrial Project Milestone Documentation

Required Documentation	**Milestone**				
	Project Plan	**Engineering & Permitting**	**Pre-Deployment**	**Deployment**	**Network Activation & Program Closeout**
Location List	X	X	X	X	X
EHP Questionnaire	X				
Project Timeline	X				
Project Design Shapefiles	X	X		X	X
Detailed Design Drawings		X			
Permit Status Summary	X	X			
Evidence of Approved Permits		X			
Bill of Materials		X	X	X	X
Executed Contract(s) for Construction Labor			X		
Evidence of Material Procurement			X		

Required Documentation	Milestone				
	Project Plan	Engineering & Permitting	Pre-Deployment	Deployment	Network Activation & Program Closeout
Evidence of Staging and Material Delivery			X		
Evidence of Environmental Approval			X		
Active Subscriber Test Results					X
Evidence of Expense Tracking and Record Retention	X				
Evidence of Match Obligation	X	X	X	X	X
FWA Design Template (*wireless projects only*)	X	X		X	X
Closeout Documentation					X

Project Plan Milestone Documentation Requirements

The Project Plan Milestone culminates in a Project Plan Meeting in which subgrantees will present project plans to WBO for discussion and approval. Subgrantees must submit the following required documentation to WBO's grant management system at least two weeks before the scheduled Project Plan Meeting:

- Location List
- EHP Questionnaire
- Project Timeline
- Project Design Shapefiles
- Permit Status Summary
- Evidence of Match Obligation
- Evidence of Expense Tracking and Record Retention
- FWA Design Template

Failure to submit complete documentation will result in the Project Plan Meeting being rescheduled until such time that complete documentation has been received and approved by WBO.

The following subsections identify the submission details for the required documents:

Location List

The Location List identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves to track the subgrantee's completion of this service commitment throughout the life of the program.

As part of this milestone submission, the Location List must include any project phasing proposed by the subgrantee, if applicable. The subgrantee must follow the template instructions to numerically identify which project phase each BSL is associated with. The assigned phasing of BSLs must align with the proposed phasing identified within the subgrantee's Project Design Shapefiles submission required as part of this milestone.

The Location List must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

EHP Questionnaire

Completion of the EHP Questionnaire demonstrates that the subgrantee is aware of the EHP requirements of the BEAD Program and has adequately identified the impact of these requirements on their project.

The EHP Questionnaire must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

As part of this milestone submission, the EHP Questionnaire ensures that the subgrantee has accounted for the impact of the EHP requirements in their project planning.

To avoid project delays caused by the BEAD program's environmental requirements, the subgrantee should complete and submit the EHP Questionnaire as soon as possible to initiate the EHP process. The re-submission of the EHP Questionnaire is required as part of this milestone as it represents a critical component of the project plan.

NOTE: The subgrantee may not initiate any unapproved deployment or ground-disturbing construction activities until the EHP process has been concluded and approved by NTIA and a Notice to Proceed has been issued by WBO.

Project Timeline

The Project Timeline submission demonstrates that the subgrantee has an adequate project plan to complete the network deployment work within the program timeline.

The Project Timeline must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

As part of this milestone submission, the Project Timeline must include any proposed project phasing and updates to the anticipated start dates and end dates for the following project components for each individual project phase:

- Project Planning

- EHP Permitting
- Design Engineering
- Permitting (non-environmental)
- Material Acquisition
- Network Deployment
- Network Activation
- Project Closeout

The subgrantee must follow the template instructions to also include the subgrantee's projected milestone submission timeline.

NOTE: WBO reserves the right to request additional documentation as required to validate the subgrantee's project plan. The subgrantee must continue to maintain the Project Timeline until grant closeout and shall submit an updated Project Timeline each quarter or at intervals specified by WBO. WBO reserves the right to request the submission of an updated Project Timeline at any time.

Project Design Shapefiles

The Project Design Shapefiles submission should demonstrate that the proposed infrastructure, service area, materials, and technology match those approved in the subaward agreement and confirm that the infrastructure is capable of consistently delivering the minimum proposed speeds to all proposed locations.

The Project Design Shapefiles must be submitted in shapefile format. A shapefile is a common geospatial vector data format used to store and represent geographic features—such as points, lines, and polygons—along with associated attribute information. Each shapefile consists of six separate file extensions (.CPG, .DBF, .PRJ, .SBN, .SPX, and .SHP), all of which must be included. Shapefiles must be submitted in a single zipped folder containing all six components.

As part of this milestone submission, Project Design Shapefiles must be submitted with the following details included:

- Where applicable, all planned project routes and tower locations proposed as part of the approved grant project. Each type of infrastructure must be represented with the appropriate feature type

(points or lines). The infrastructure should include attributes delineating between new and existing infrastructure (e.g., existing wirelines submitted as an in-kind match should be identified as existing infrastructure).

- BSLs must be submitted as point features and shall match the locations identified in the subgrantee's subaward agreement.
- Any detailed project phasing that is proposed by the subgrantee shall be submitted as polygon features. Each polygon must encompass all proposed locations and infrastructure routes included in that project phase. For projects that do not include phased construction or that consist of a single construction phase, the full project area shall be submitted as a single polygon feature.
- For Licensed and Unlicensed FWA projects, provide a layer with a point attribute containing each site with fields described in the Sites tab in the FWA Design Template. For BSLs, provide the fields in the BSL tab of the FWA Design Template. Also, provide propagation layers that contain received level (or Reference Signal Received Power (RSRP) for 3GPP technologies). The bin sizes for the propagation layers should be no larger than 50 meters.

The phases identified in the Project Design Shapefiles must align with the other documentation submitted as part of the subgrantee's project plan.

Permit Status Summary

The Permit Status Summary demonstrates that the subgrantee has adequately identified and is prepared to execute all required permits needed for network deployment and that they will be able to meet their program obligations within the dates specified in their contract agreement. The subgrantee must list all known permits required for the complete network deployment to serve all obligated Broadband Serviceable Locations (BSL). Permit types could include but are not limited to rights-of-way, environmental, special crossings, private easements, franchise agreements, and federal permits.

The Permit Status Summary must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

As part of this milestone submission, the subgrantee must fill out the template listing all anticipated permits required to complete the proposed project. For each permit listed, the subgrantee must indicate the project phase, permit name, permitting authority and anticipated permit execution date. The execution dates identified in the summary must align with dates identified in the Project Timeline submission.

NOTE: As additional permits are identified as required by the subgrantee, the Permit Status Summary must be updated. WBO reserves the right to request additional documentation as required to validate the subgrantee's project plan. The subgrantee must continue to maintain the Permit Status Summary until grant closeout and shall submit an updated Permit Status Summary each quarter or at intervals specified by WBO. WBO reserves the right to request the submission of an updated Permit Status Summary at any time. If the subgrantee encounters an issue obtaining required permits, it is the subgrantee's obligation to immediately escalate to the state for assistance resolving the issue.

Evidence of Expense Tracking and Record Retention

The Evidence of Expense Tracking and Record Retention documentation demonstrates that the subgrantee is in compliance with BEAD Program requirements, including accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

The subgrantee must provide the name of their financial system (e.g., name of software) and evidence that the financial system has the capacity to generate an itemized report to verify total federal funds and match expended (e.g., screenshot; sample reconciliation document). A grant financial management plan or expense tracking policy can also be submitted.

In addition, the subgrantee must provide proof that they are able to maintain all relevant project and award records in compliance with the record retention requirements in Section 2.5. This can be done by providing a company-wide Records Retention policy for WBO's review.

Evidence of Expense Tracking and Record Retention must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

As part of this milestone submission, the submission of the subgrantee's Evidence of Expense Tracking and Record Retention demonstrates that the subgrantee is in compliance with BEAD requirements.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

FWA Design Template

The Fixed Wireless Access (FWA) Design Template submission demonstrates that the proposed wireless infrastructure, service area, equipment, and technology match those approved in the subaward agreement, confirming that the wireless components of the network are capable of consistently delivering the minimum proposed speeds to all proposed project locations.

Subgrantees will be required to submit a FWA Design Template at each milestone that includes any design updates that have occurred since the last milestone, including but not limited to site location changes, site coordinate corrections, antenna azimuth and mounting height adjustments, equipment make or model changes, and backhaul changes. All BSLs reported in the template must match the BSLs awarded.

Propagation must be calculated to each BSL using a vetted propagation tool, with results for signal intensity and signal quality reported in the corresponding fields. Propagation paths shall be calculated and analyzed from each sector to the BSLs served by the given sector; results obtained by point querying a grid are not acceptable. The corresponding throughputs for each BSL will be determined from the vendor-provided MCS tables; these throughputs should not be provisioned or nominal throughputs.

For designs using multiple bands, propagation from each band shall be provided and reflected for each BSL in the FWA Design Template by adding

columns for signal intensity, signal quality, uplink throughput, and downlink throughput for each band per BSL.

All BSLs must accurately report the serving sector ID. All sectors in the Sectors tab must reflect the correct site where the given sector is present.

The Fixed Wireless Access (FWA) Design Template must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

Engineering & Permitting Milestone Documentation Requirements

Subgrantees must submit the following required documentation for this milestone:

- Location List
- Project Design Shapefiles
- Detailed Design Drawings
- Permit Status Summary
- Evidence of Approved Permits
- Bill of Materials
- Evidence of Match Obligation
- FWA Design Template

The following subsections identify the submission details for the required documents:

Location List

The Location List identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves to track the subgrantee's completion of this service commitment throughout the life of the program.

The Location List must be updated to identify which BSLs are included as part of the milestone reimbursement request.

The Location List must be submitted to WBO's grant management system via an updated version of the previously provided template.

Project Design Shapefiles

The Project Design Shapefiles submission should demonstrate that the proposed infrastructure, service area, materials, and technology match those approved in the subaward agreement and confirm that the infrastructure is capable of consistently delivering the minimum proposed speeds to all proposed locations.

The Project Design Shapefiles must be submitted in shapefile format. A shapefile is a common geospatial vector data format used to store and represent geographic features—such as points, lines, and polygons—along with associated attribute information. Each shapefile consists of six separate file extensions (.CPG, .DBF, .PRJ, .SBN, .SPX, and .SHP), all of which must be included. Shapefiles must be submitted in a single zipped folder containing all six components.

As part of this milestone submission, updated Project Design Shapefiles must be submitted to reflect design updates that have occurred during detailed design engineering. As with previous submissions, the infrastructure should be attributed to delineate between new and existing infrastructure. These Project Design Shapefiles must align with the subgrantee's Detailed Design Drawings and Bill of Materials submissions required as part of this milestone. The Project Design Shapefiles must include the following:

- All underground infrastructure proposed as part of the approved grant project, including but not limited to conduit, vaults, pedestals, and cabinets. Each type of infrastructure must be represented with the appropriate feature type (points or lines) and associated attribute information as specified in the requirements below.
    - Conduit must be represented as a line feature. Attributes must include conduit size and quantity. A single line may represent multiple conduits installed along the same path. This layer must be titled "conduit."
    - Vaults must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include vault dimensions. This layer must be titled "vaults."
    - Pedestals must be represented as point features. Points must be placed at the exact coordinates representing the precise installed

location. Attributes must include the pedestal model number. This layer must be titled "pedestals."

  - Cabinets must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include the cabinet make, model, and fiber capacity, listed as separate attributes. This layer must be titled "cabinets."

- All aerial infrastructure proposed as part of the approved grant project must be included, including poles and attachment points. Each feature must be represented appropriately and include the required attributes as outlined below.
  - Aerial support structures must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include infrastructure support type (all dielectric self-supporting (ADSS) or lashed to strand). This layer must be titled "Support_Structures."

- All fiber cable and associated infrastructure proposed as part of the approved grant project must be included. Each element must be represented with the appropriate feature type (points or lines) and include the required attributes.
  - Fiber must be represented as line features. Areas where fiber cables run parallel to one another must be shown as separate lines. Attributes must include the cable manufacturer and fiber count. This layer must be titled "Fiber_Cable."
  - Network access points, splice points, and slack storage locations must each be represented as separate point features.
    - A network access point is any location along the fiber infrastructure that facilitates spliced or pre-connectorized connections to the network, such as taps or dedicated splice enclosures used for customer service drops.
    - Splice points must represent all intermediate splice closures necessary to complete the fiber network, excluding network access points.
    - Slack storage is a fiber coil or snowshoe on the network where additional fiber cable is stored for the purpose of network maintenance or future network access points.

    - The layers must be titled "Network_Access_Points," "Splice_Points," and "Slack_Storage," respectively.

- Broadband Serviceable Locations (BSL) identified in the Location List submitted as part of this milestone. BSLs must be submitted as point features and shall match the locations identified in the subgrantee's subaward agreement.
- Any detailed project phasing that is proposed by the subgrantee shall be submitted as polygon features. Each polygon must encompass all proposed locations and infrastructure routes included in that project phase. The identified phases shall match those indicated in this milestone; any deviation from the proposed phases requires prior approval from WBO. For projects that do not include phased construction or that consist of a single construction phase, the full project area shall be submitted as a single polygon feature.
- For Licensed and Unlicensed FWA projects, provide a layer with a point attribute containing each site with fields described in the Sites tab in the FWA Design Template. For BSLs, provide the fields in the BSL tab of the FWA Design Template. Also, provide propagation layers that contain received level (or Reference Signal Received Power (RSRP) for 3GPP technologies). The bin sizes for the propagation layers should be no larger than 50 meters.

The information in the Project Design Shapefiles must align with the other documentation submitted as part of the subgrantee's engineering design submission.

Detailed Design Drawings

The Detailed Design Drawings submission demonstrates that the proposed infrastructure, service area, equipment, and technology match those approved in the subaward agreement, confirming that the infrastructure is capable of consistently delivering the minimum proposed speeds to all proposed project locations. The detailed plans are proof that the subgrantee has completed the required engineering work needed to permit and construct the network as proposed.

Detailed Design Drawings must be submitted to WBO's grant management system as separate attachments. This submission should be in the native format that the subgrantee's staff or designated contractor will use to deploy

the network (e.g., .PDF, Fiber Management Software data extension). Additionally, if any portion of the deployment requires the design information to be submitted in a specific format for a permitting authority to grant executed permits, the Detailed Design Drawings should be submitted in the format that complies with that permitting authority's requirements.

The detailed design drawings submission must align with the subgrantee's submitted Project Design Shapefiles and possess the required detail to permit and construct the proposed network deployment. The submission shall include but not be limited to the following:

- Conduit
- Vaults
- Pedestals
- Cabinets
- Aerial support structures
- Fiber cable
- Network access points
- Splice enclosures
- Slack storage
- Broadband Serviceable Locations (BSL)
- Tower locations with equipment elevations
- Wireless antenna equipment schematics

WBO reserves the right to request additional documentation to validate that the detailed engineering plans are construction ready and will be used during the deployment of the network.

Permit Status Summary

The Permit Status Summary demonstrates that the subgrantee has adequately identified and is prepared to execute all required permits needed for network deployment and that they will be able to meet their program obligations within the dates specified in their contract agreement. The subgrantee must list all known permits required for the complete network deployment to serve all obligated Broadband Serviceable Locations (BSL). Permit types could include but are not limited to rights-of-way,

environmental, special crossings, private easements, franchise agreements, and federal permits.

The Permit Status Summary must be submitted to WBO's grant management system via an updated version of the previously provided template.

As part of this milestone submission, the subgrantee must update the template to include the actual submission dates for the permits required to complete the proposed project. The submission dates identified in the summary must align with dates identified in the supporting Evidence of Approved Permits documentation.

NOTE: As additional permits are identified as required by the subgrantee, the Permit Status Summary must be updated. WBO reserves the right to request additional documentation as required to validate the subgrantee's project plan. The subgrantee must continue to maintain the Permit Status Summary until grant closeout and shall submit an updated Permit Status Summary each quarter or at intervals specified by WBO. WBO reserves the right to request the submission of an updated Permit Status Summary at any time. If the subgrantee encounters an issue obtaining required permits, it is the subgrantee's obligation to immediately escalate to the state for assistance resolving the issue.

Evidence of Approved Permits

The Evidence of Approved Permits documentation demonstrates that the subgrantee has obtained executed permit approvals (signed by the permitting authority) for all the required permit applications for all permits identified in the Permit Status Summary submission as part of this milestone (excluding environmental).

Evidence of Approved Permits must be submitted to WBO's grant management system as separate attachments.

WBO reserves the right to request additional information as part of this submission as required to validate the documentation.

Bill of Materials (BOM)

The Bill of Materials (BOM) submission demonstrates that the subgrantee has adequately identified the appropriate material types and quantities needed to deploy the proposed network, inclusive of all required elements outside and inside facilities that will enable connectivity to the end user. The subgrantee

will later provide updated BOMs during subsequent milestones for which they seek reimbursement.

The BOM must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

Project materials include but are not limited to:

- Fiber cable
- Fiber cabinet splice cases
- Pedestals
- Lashing wire
- Conduit
- Optical network terminals
- Shelves
- Fiber optic network cards
- Redundant fiber cables
- Patch panels
- Fiber entrance cabinet
- Fiber entrance cabinet splice cases
- Patch panel fiber jumpers
- Splice closures
- Drop taps
- Fiber markers
- Passive optical network receiver
- Adapters

As part of this milestone submission, the subgrantee shall populate the template with all anticipated materials and quantities required to complete the project. The listed materials must match those submitted during the Pre-deployment Milestone submissions and placed as part of the Deployment Milestone submissions. During the life of the project, if deviations to the

materials list occur, the subgrantee must notify WBO to indicate the changes and provide an updated BOM.

The material quantities submitted during this milestone should align with the documentation provided in the submitted Project Design Shapefiles and Detailed Design Drawings.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted through WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

FWA Design Template

The Fixed Wireless Access (FWA) Design Template submission demonstrates that the proposed wireless infrastructure, service area, equipment, and technology match those approved in the subaward agreement, confirming that the wireless components of the network are capable of consistently delivering the minimum proposed speeds to all proposed project locations.

Subgrantees will be required to submit a FWA Design Template at each milestone that includes any design updates that have occurred since the last milestone, including but not limited to site location changes, site coordinate corrections, antenna azimuth and mounting height adjustments, equipment make or model changes, and backhaul changes. All BSLs reported in the template must match the BSLs awarded.

Propagation must be calculated to each BSL using a vetted propagation tool, with results for signal intensity and signal quality reported in the corresponding fields. Propagation paths shall be calculated and analyzed from each sector to the BSLs served by the given sector; results obtained by point querying a grid are not acceptable. The corresponding throughputs for each BSL will be determined from the vendor-provided MCS tables; these throughputs should not be provisioned or nominal throughputs.

For designs using multiple bands, propagation from each band shall be provided and reflected for each BSL in the FWA Design Template by adding columns for signal intensity, signal quality, uplink throughput, and downlink throughput for each band per BSL.

All BSLs must accurately report the serving sector ID. All sectors in the Sectors tab must reflect the correct site where the given sector is present.

The FWA Design Template must be submitted to WBO's grant management system via an updated version of the previously provided template.

Pre-deployment Milestone Documentation Requirements

Subgrantees must submit the following required documentation for this milestone:

- Location List
- Bill of Materials
- Executed Contract(s) for Construction Labor
- Evidence of Material Procurement
- Evidence of Staging and Material Delivery
- Evidence of Environmental Approval
- Evidence of Match Obligation

The following subsections identify the submission details for the required documents:

Location List

The Location List identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves to track the subgrantee's completion of this service commitment throughout the life of the program.

The Location List must be updated to identify which BSLs are included as part of the milestone reimbursement request.

The Location List must be submitted to WBO's grant management system via an updated version of the previously provided template.

Bill of Materials (BOM)

The Bill of Materials (BOM) submission demonstrates that the subgrantee has adequately identified the appropriate material types and quantities needed to deploy the proposed network, inclusive of all required elements outside and inside facilities that will enable connectivity to the end user. The subgrantee will later provide updated BOMs during subsequent milestones for which they seek reimbursement.

The BOM must be submitted to WBO's grant management system via an updated version of the previously provided template.

As part of this milestone submission, the subgrantee shall update the template to indicate the quantities of materials that have been ordered and delivered to the subgrantee's designated facility(s).

Executed Contract(s) for Construction Labor

Executed Contract(s) for Construction Labor documents demonstrate that the subgrantee has taken the necessary steps for mobilizing the labor workforce required to conduct network deployment.

The Executed Contract(s) for Construction Labor documents must be submitted to WBO's grant management system as separate attachments.

As part of this milestone submission, the subgrantee must provide evidence of construction mobilization by submitting executed copy(s) of construction labor contract(s), which must identify sufficient contracted resources to construct the entirety of the network contained within the project phase(s) for which milestone reimbursement is sought.

Subgrantees who will utilize internal resources to "self-perform" must provide the following:

- A detailed list of personnel assigned to the project identifying the name, job title, and estimated hours assigned to the project
- A detailed list of equipment that will be used on the project (e.g., bucket trucks, boring machines, splice machines). Subgrantee shall identify the make and model of the equipment as well as if the equipment is owned or will be leased to support the project's network construction

WBO reserves the right to request additional information as part of this submission as required to validate the documentation.

Evidence of Material Procurement

Evidence of Material Procurement demonstrates that the subgrantee has taken the necessary steps for obtaining the materials required for network deployment.

The Evidence of Material Procurement documents must be submitted to WBO's grant management system as separate attachments.

As part of this milestone submission, the subgrantee must provide evidence of material acquisition by submitting executed purchase orders or executed copy(s) of material supply contract(s), identifying the required materials and quantities sufficient to construct the entirety of the network contained within the project phase(s) for which milestone reimbursement is sought. The materials quantities identified in the purchase order(s) or contract(s) should align with the BOM submitted as part of this milestone submission.

Subgrantees who will utilize an existing stock of materials must provide the following:

- A detailed list of project materials that will be used on the project and quantities identified in the contract should align with the BOM submitted as part of the Pre-deployment Milestone submission. The detailed list shall identify from which internal facility (e.g., warehouse, material yard) the materials will be obtained and the subgrantee shall indicate the name, address, and latitude and longitude of the facility(s).

WBO reserves the right to request additional information as part of this submission as required to validate the documentation.

Evidence of Staging and Material Delivery

Evidence of Staging and Material Delivery documents demonstrate that the subgrantee has undertaken the necessary staging required for network deployment.

The Evidence of Staging and Material Delivery documents must be submitted to WBO's grant management system as separate attachments.

As part of this milestone submission, the subgrantee must provide evidence of project staging and material delivery by submitting the following documentation:

- Identifying the staging location(s) for the entirety of the network contained within the project phase(s) for which milestone reimbursement is sought. The identification information should include the facility's physical address, latitude and longitude, and photographs of the location identifying proper security measures and adequate space to stage network construction.
- Evidence of material delivery to the identified staging location(s) can be provided by submitting material receipts or packing slips for the delivered material. WBO may also request photographs of the material being stored at the staging location. The evidence should align with the quantities identified in the BOM submitted as part of this milestone submission.

WBO reserves the right to request additional information as part of this submission as required to validate the documentation.

Evidence of Environmental Approval

The Evidence of Environmental Approval documentation demonstrates that the subgrantee has obtained all required environmental approvals to begin groundbreaking activities.

Evidence of Environmental Approval must be submitted to WBO's grant management system.

As part of this milestone, the subgrantee must also provide written documentation from NTIA confirming that the project's EHP process has been concluded and approved. WBO reserves the right to request additional information as part of this submission as required to validate the documentation.

NOTE: The EHP process encompasses the entirety of the project scope, irrespective of subgrantee phasing. The subgrantee may not initiate any deployment or ground-disturbing construction activities on any project phase until the EHP process has been concluded and approved by NTIA.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

Deployment Milestone Documentation Requirements

Subgrantees must submit the following required documentation for this milestone:

- Location List
- Project Design Shapefiles
- Bill of Materials
- Evidence of Match Obligation
- FWA Design Template

The following subsections identify the submission details for the required documents:

Location List

The Location List identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves to track the subgrantee's completion of this service commitment throughout the life of the program.

The Location List must be updated to identify which BSLs are included as part of the milestone reimbursement request.

The Location List must be submitted to WBO's grant management system via an updated version of the previously provided template.

Project Design Shapefiles

The Project Design Shapefiles submission should demonstrate that the proposed infrastructure, service area, materials, and technology match those approved in the subaward agreement and confirm that the infrastructure is capable of consistently delivering the minimum proposed speeds to all proposed locations.

The Project Design Shapefiles must be submitted in shapefile format. A shapefile is a common geospatial vector data format used to store and represent geographic features—such as points, lines, and polygons—along with associated attribute information. Each shapefile consists of six separate file extensions (.CPG, .DBF, .PRJ, .SBN, .SPX, and .SHP), all of which must be included. Shapefiles must be submitted in a single zipped folder containing all six components.

As part of this milestone submission, updated Project Design Shapefiles must be submitted to reflect the final placement of infrastructure that has occurred during deployment of the network (*inclusive of all infrastructure with the exception of splice enclosures, splicing, and customer drops*). This submission represents the subgrantee's "as-built documentation." This submission will be used by WBO to conduct field verification. As with previous submissions, the infrastructure should be attributed to delineate between new and existing infrastructure. These Project Design Shapefiles must align with the subgrantee's BOM submission required as part of this milestone. The Project Design Shapefiles must include the same features and level of detail required in previous submissions.

The information in the Project Design Shapefiles must align with the other documentation submitted as part of the subgrantee's as-built documentation. WBO reserves the right to request additional information as part of this submission as required to validate the documentation.

For Licensed and Unlicensed FWA projects, provide a layer with a point attribute containing each site with fields described in the Sites tab in the FWA Design Template. For BSLs, provide the fields in the BSL tab of the FWA Design Template. Also, provide propagation layers that contain received level (or Reference Signal Received Power (RSRP) for 3GPP technologies). The bin sizes for the propagation layers should be no larger than 50 meters.

Bill of Materials (BOM)

The Bill of Materials (BOM) submission demonstrates that the subgrantee has adequately identified the appropriate material types and quantities needed to deploy the proposed network. The subgrantee will later provide updated BOMs during subsequent milestones for which they seek reimbursement.

The BOM must be submitted to WBO's grant management system via an updated version of the previously provided template.

As part of this milestone submission, the subgrantee must provide an updated BOM to indicate the quantities of materials that have been deployed as part of network deployment, inclusive of all outside and inside plant elements required to enable connectivity to the end user. The material quantities indicated as deployed should align with the Project Design Shapefiles submitted as part of the subgrantee's as-built documentation.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

FWA Design Template

The Fixed Wireless Access (FWA) Design Template submission demonstrates that the proposed wireless infrastructure, service area, equipment, and technology match those approved in the subaward agreement, confirming that the wireless components of the network are capable of consistently delivering the minimum proposed speeds to all proposed project locations.

Subgrantees will be required to submit a FWA Design Template at each milestone that includes any design updates that have occurred since the last milestone, including but not limited to site location changes, site coordinate corrections, antenna azimuth and mounting height adjustments, equipment

make or model changes, and backhaul changes. All BSLs reported in the template must match the BSLs awarded.

Propagation must be calculated to each BSL using a vetted propagation tool, with results for signal intensity and signal quality reported in the corresponding fields. Propagation paths shall be calculated and analyzed from each sector to the BSLs served by the given sector; results obtained by point querying a grid are not acceptable. The corresponding throughputs for each BSL will be determined from the vendor-provided MCS tables; these throughputs should not be provisioned or nominal throughputs.

For designs using multiple bands, propagation from each band shall be provided and reflected for each BSL in the FWA Design Template by adding columns for signal intensity, signal quality, uplink throughput, and downlink throughput for each band per BSL.

All BSLs must accurately report the serving sector ID. All sectors in the Sectors tab must reflect the correct site where the given sector is present.

The FWA Design Template must be submitted to WBO's grant management system via an updated version of the previously provided template.

Network Activation & Program Closeout Documentation Requirements

Subgrantees must submit the following required documentation for this milestone:

- Location List
- Project Design Shapefiles
- Bill of Materials
- Active Subscriber Test Results
- Evidence of Match Obligation
- FWA Design Template
- Closeout Documentation

The following subsections identify the submission details for the required documents:

Location List

The Location List identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves to track the subgrantee's completion of this service commitment throughout the life of the program.

The Location List must be updated to identify which BSLs are included as part of the milestone reimbursement request. Additionally, the Location List must be updated by the subgrantee to indicate the maximum offered upload speed, maximum offered download speed, and latency for each indicated location.

The Location List must be submitted to WBO's grant management system via an updated version of the previously provided template.

Project Design Shapefiles

The Project Design Shapefiles submission should demonstrate that the proposed infrastructure, service area, materials, and technology match those approved in the subaward agreement and confirm that the infrastructure is capable of consistently delivering the minimum proposed speeds to all proposed locations.

The Project Design Shapefiles must be submitted in shapefile format. A shapefile is a common geospatial vector data format used to store and represent geographic features—such as points, lines, and polygons—along with associated attribute information. Each shapefile consists of six separate file extensions (.CPG, .DBF, .PRJ, .SBN, .SPX, and .SHP), all of which must be included. Shapefiles must be submitted in a single zipped folder containing all six components.

As part of this milestone submission, updated Project Design Shapefiles must be submitted to reflect the final placement of infrastructure that has occurred during network activation (*e.g., splice enclosures, splicing, taps, and customer drops*). This submission represents the subgrantee's incremental update to their provided "as-built documentation." These Project Design Shapefiles must align with the subgrantee's BOM submission required as part of this milestone. The Project Design Shapefiles must include the same features and level of detail required in previous submissions.

For Licensed and Unlicensed FWA projects, provide a layer with a point attribute containing each site with fields described in the Sites tab in the FWA Design Template. For BSLs, provide the fields in the BSL tab of the FWA Design Template. Also, provide propagation layers that contain received level (or Reference Signal Received Power (RSRP) for 3GPP technologies). The bin sizes for the propagation layers should be no larger than 50 meters.

The information in the Project Design Shapefiles must align with the other documentation submitted as part of the subgrantee's as-built documentation. WBO reserves the right to request additional information as part of this submission as required to validate the documentation.

Bill of Materials (BOM)

The Bill of Materials (BOM) submission demonstrates that the subgrantee has adequately identified the appropriate material types and quantities needed to deploy the proposed network, inclusive of all required elements outside and inside facilities that will enable connectivity to the end user.

The BOM must be submitted to WBO's grant management system via an updated version of the previously provided template.

As part of this milestone submission, the subgrantee must provide an updated BOM to indicate the quantities of materials that have been deployed as part of network activation. The material quantities indicated as deployed should align with the Project Design Shapefiles submitted as part of the subgrantee's as-built documentation.

Active Subscriber Test Results

The Active Subscriber Test Results submission demonstrates that the subgrantee has completed the deployment of a functioning network that is capable of providing service that meets or exceeds the program performance requirements. The required testing is consistent with well-established FCC practices and designed to minimize the administrative burdens on subgrantees.

Active subscriber test data must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

Requirements for Active Subscriber Testing are provided in Appendix E.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

FWA Design Template

The Fixed Wireless Access (FWA) Design Template submission demonstrates that the proposed wireless infrastructure, service area, equipment, and technology match those approved in the subaward agreement, confirming that the wireless components of the network are capable of consistently delivering the minimum proposed speeds to all proposed project locations.

Subgrantees will be required to submit a FWA Design Template at each milestone that includes any design updates that have occurred since the last milestone, including but not limited to site location changes, site coordinate corrections, antenna azimuth and mounting height adjustments, equipment make or model changes, and backhaul changes. All BSLs reported in the template must match the BSLs awarded.

Propagation must be calculated to each BSL using a vetted propagation tool, with results for signal intensity and signal quality reported in the corresponding fields. Propagation paths shall be calculated and analyzed from each sector to the BSLs served by the given sector; results obtained by point querying a grid are not acceptable. The corresponding throughputs for each BSL will be determined from the vendor-provided MCS tables; these throughputs should not be provisioned or nominal throughputs.

For designs using multiple bands, propagation from each band shall be provided and reflected for each BSL in the FWA Design Template by adding columns for signal intensity, signal quality, uplink throughput, and downlink throughput for each band per BSL.

All BSLs must accurately report the serving sector ID. All sectors in the Sectors tab must reflect the correct site where the given sector is present.

The FWA Design Template must be submitted to WBO's grant management system via an updated version of the previously provided template.

Closeout Documentation

Closeout requires satisfactory submission of all final performance, technical, and financial reports as well as documentation of real property and the apportioned federal interest.

Typically, performance reporting will follow the same template as the semi-annual report, capturing the requisite technical details confirming project completion and compliance with BEAD standards, including as-built GIS maps, network diagrams, and an inventory of deployed assets. The same SF-425 template used for semi-annual reporting will be the final financial report in the closeout package. The final SF-425 is cumulative and should include all financial transactions that occurred during the life of the award, including any closeout costs. Subgrantees subject to federal interest requirements for equipment and real property purchased with BEAD funds will submit tangible property documentation (e.g., SF-428, SF-429) to acknowledge the 10-year obligation for BEAD-funded infrastructure. Finally, 2 CFR § 200.334 requires that subgrantees must retain all records related to federal awards for at least three years after final payments and the award is closed out.

Appendix C: Milestone Documentation Requirements for LEO Projects

Documentation to be submitted upon contract award and each milestone reimbursement request are identified in the following table and described in detail below. Subgrantees should note that this guide is not binding, exhaustive, or final, and it may be updated by WBO at any time, as guidance is updated. The BEAD Program is subject to both federal and state law and guidance, and it is the responsibility of BEAD subgrantees to comply with all applicable laws and guidance for the program.

Table 4: LEO Project Milestone Documentation

Required Documentation	Milestone				
	Project Plan	**Environmental & Historic Preservation**	**Capacity Verification (Availability)**	**Capacity Verification (Take-Rate)**	**Semi-Annual Equal Installment Reimbursements**
Project Plan Document	X				
Location List (LEO)	X		X	X	X
EHP Questionnaire	X				
Evidence of Expense Tracking and Record Retention	X				
Evidence of Match Obligation	X	X	X	X	X
Evidence of Environmental Approval		X			

Required Documentation	Milestone				
	Project Plan	**Environmental & Historic Preservation**	**Capacity Verification (Availability)**	**Capacity Verification (Take-Rate)**	**Semi-Annual Equal Installment Reimbursements**
Certification from Authorized Organizational Representative	X				
Certification of Capacity (Availability)			X		
Certification of Capacity (Take-Rate)				X	
Certification of Service Commitments					X
Active Subscriber Test Results				X	

Project Plan Milestone Documentation Requirements

The Project Plan Milestone culminates in a Project Plan Meeting in which subgrantees will present project plans to WBO for discussion and approval. Subgrantees must submit the following required documentation to WBO's grant management system at least two weeks before the Project Plan Meeting:

- Project Plan Document
- Location List (LEO)
- EHP Questionnaire
- Certification from Authorized Organizational Representative
- Evidence of Expense Tracking and Record Retention
- Evidence of Match Obligation

Failure to submit complete documentation will result in the Project Plan Meeting being rescheduled until such time that complete documentation has been received and approved by WBO.

The following subsections identify the submission details for the required documents:

Project Plan Document

The Project Plan Document submission demonstrates that the subgrantee has an adequate project plan to complete the network deployment work within the program timeline.

The project plan must detail the capacity deployment phases and timelines, including:

- Identification and integration of realistic NEPA and NHPA responsibilities and associated permitting components if relevant
- Validation of the project's approved subgrant budget; if any changes or gaps are identified, those must be documented and approved by WBO in accordance with its grant management practices and the requirements of 2 CFR § 200
- Identification of anticipated milestone completion dates, estimated to the nearest month

Location List (LEO)

The Location List (LEO) identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves to track the subgrantee's completion of this service commitment throughout the life of the program.

The Location List (LEO) must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

Note: LEO Capacity Subgrant projects use a different location list template from the one provided for terrestrial infrastructure projects.

As part of this milestone submission, the applicable portions of the Location List (LEO) must be completed by the subgrantee to identify all BSLs which they have made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program.

EHP Questionnaire

Completion of the EHP Questionnaire template demonstrates that the subgrantee is aware of the EHP requirements of the BEAD Program and has adequately identified the impact of these requirements on their project.

The EHP Questionnaire must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

As part of this milestone submission, the EHP Questionnaire ensures that the subgrantee has accounted for the impact of the EHP requirements in their project planning.

To avoid project delays caused by the BEAD program's environmental requirements, the subgrantee should complete and submit the EHP Questionnaire as soon as possible to initiate the EHP process. The re-submission of the EHP Questionnaire is required as part of this milestone as it represents a critical component of the project plan.

NOTE: The subgrantee may not initiate any unapproved deployment or ground-disturbing construction activities until the EHP process has been concluded and approved by NTIA and a Notice to Proceed has been issued by WBO.

Certification from Authorized Organizational Representative

The Certification from Authorized Organizational Representative documentation provides written attestation from the subgrantee that certifies the documentation submitted for the Project Plan milestone is complete and accurate to the best of the entity's knowledge.

The Certification from Authorized Organizational Representative documentation must be submitted to WBO's grant management system as a single file.

Evidence of Expense Tracking and Record Retention

The Evidence of Expense Tracking and Record Retention documentation demonstrates that the subgrantee is in compliance with BEAD Program requirements, including accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

The subgrantee must provide the name of their financial system (e.g., name of software) and evidence that the financial system has the capacity to generate an itemized report to verify total federal funds and match expended (e.g., screenshot; sample reconciliation document). A grant financial management plan or expense tracking policy can also be submitted.

In addition, the subgrantee must provide proof that they are able to maintain all relevant project and award records in compliance with the record retention requirements in Section 2.5. This can be done by providing a company-wide Records Retention policy for WBO's review.

Evidence of Expense Tracking and Record Retention must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

As part of this milestone submission, the submission of the subgrantee's Evidence of Expense Tracking and Record Retention demonstrates that the subgrantee is in compliance with BEAD requirements.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

Environmental & Historic Preservation Milestone Documentation Requirements

For the Environmental & Historic Preservation Milestone, subgrantees must submit the following required documentation to WBO's grant management system:

- Evidence of Environmental Approval
- Evidence of Match Obligation

The following subsections identify the submission details for the required documents:

Evidence of Environmental Approval

The Evidence of Environmental Approval documentation demonstrates that the subgrantee has obtained all environmental approvals required by the BEAD program. LEO Capacity Subgrants are not exempt from this requirement.

Evidence of Environmental Approval must be submitted to WBO's grant management system.

As part of this milestone, the subgrantee must also provide written documentation from NTIA confirming that the project's EHP process has been concluded and approved. WBO reserves the right to request additional information as part of this submission as required to validate the documentation.

NOTE: The EHP process encompasses the entirety of the project scope, irrespective of subgrantee phasing. The subgrantee may not initiate any deployment or ground-disturbing construction activities on any project phase until the EHP process has been concluded and approved by NTIA.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

Capacity Verification (Availability) Milestone Documentation Requirements

For the Capacity Verification (Availability) Milestone, subgrantees must submit the following required documentation to WBO's grant management system:

- Location List (LEO)
- Certification of Capacity (Availability)
- Evidence of Match Obligation

Location List (LEO)

The Location List (LEO) identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves to track the subgrantee's completion of this service commitment throughout the life of the program.

The Location List (LEO) must be submitted to WBO's grant management system via an updated version of the previously provided template.

As part of this milestone submission, the applicable portions of the Location List (LEO) must be completed by the subgrantee to identify all BSLs for which they have the ability to provide service with sufficient capacity to meet BEAD Program service requirements.

Certification of Capacity (Availability)

The Certification of Capacity (Availability) documentation provides written attestation from the subgrantee that certifies that LEO broadband service is available to all BSLs identified in the Location List (LEO) delivered as part of this milestone submission.

The Certification of Capacity (Availability) documentation must be submitted to WBO's grant management system as a single file.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

Capacity Verification (Take-Rate) Milestone Documentation Requirements

For the Capacity Verification (Take-Rate) Milestone, subgrantees must submit the following required documentation to WBO's grant management system:

- Location List (LEO)
- Certification of Capacity (Take-Rate)
- Active Subscriber Test Results
- Evidence of Match Obligation

Location List (LEO)

The Location List (LEO) identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves

to track the subgrantee's completion of this service commitment throughout the life of the program.

The Location List (LEO) must be submitted to WBO's grant management system via an updated version of the previously provided template.

As part of this milestone submission, the applicable portions of the Location List (LEO) must be completed by the subgrantee to identify all BSLs to which they are currently providing broadband service as part of the BEAD program.

Certification of Capacity (Take-Rate)

The Certification of Capacity (Take-Rate) documentation provides written attestation from the subgrantee that certifies that LEO broadband service is active and provided to all BSLs identified in the Location List (LEO) delivered as part of this milestone submission.

The Certification of Capacity (Take-Rate) documentation must be submitted to WBO's grant management system as a single file.

Active Subscriber Test Results

The Active Subscriber Test Results submission demonstrates that the subgrantee has completed the deployment of a functioning network that is capable of providing service that meets or exceeds the program performance requirements. The required testing is consistent with well-established FCC practices and designed to minimize the administrative burdens on subgrantees.

Active subscriber test data must be submitted to WBO's grant management system via the template provided on WBO's BEAD website: https://broadband.wyomingbusiness.org/bead/bead/.

Requirements for Active Subscriber Testing are provided in Appendix E.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

Semi-Annual Equal Installment Reimbursements Documentation Requirements

For the Semi-Annual Equal Installment Reimbursements Milestone, subgrantees must submit the following required documentation to WBO's grant management system:

- Location List (LEO)
- Certification of Service Commitments
- Evidence of Match Obligation

Location List (LEO)

The Location List (LEO) identifies the Broadband Serviceable Locations (BSL) which the subgrantee has made a federally enforceable commitment to serve as part of the Wyoming BEAD Grant Program. Additionally, it serves to track the subgrantee's completion of this service commitment throughout the life of the program.

The Location List (LEO) must be submitted to WBO's grant management system via an updated version of the previously provided template.

As part of this milestone submission, the applicable portions of the Location List (LEO) must be completed by the subgrantee to identify all BSLs to which they are currently providing broadband service as part of the BEAD program.

Certification of Service Commitments

The Certification of Service Commitments documentation provides written attestation from the subgrantee that certifies the subgrantee:

- Delivers service to subscribers at its eligible BSLs that meets BEAD performance requirements
- Can "initiate broadband service within ten (10) business days of a request to any eligible BSL, with no charges or delays attributable to extension of the service"

- Continues to connect any eligible BSLs for which service is requested "at no charge for equipment to end-user"
- Continues to offer a Low Cost Service Offering (LCSO) to all eligible BSLs and publicize its availability widely

The Certification of Service Commitments documentation must be submitted to WBO's grant management system as a single file.

Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is in compliance with BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds.

Evidence of Match Obligation must be submitted to WBO's grant management system.

As part of this milestone submission, the submission of the subgrantee's Evidence of Match Obligation demonstrates that the subgrantee is in compliance with BEAD requirements.

Closeout Documentation Requirements

Closeout requires satisfactory submission of all final performance, technical, and financial reports as well as documentation of real property and the apportioned federal interest.

Typically, performance reporting will follow the same template as the semi-annual report, capturing the requisite technical details confirming project completion and compliance with BEAD standards, including as-built GIS maps, network diagrams, and an inventory of deployed assets. The same SF-425 template used for semi-annual reporting will be the final financial report in the closeout package. The final SF-425 is cumulative and should include all financial transactions that occurred during the life of the award, including any closeout costs. Subgrantees subject to federal interest requirements for equipment and real property purchased with BEAD funds will submit tangible property documentation (e.g., SF-428, SF-429) to acknowledge the 10-year obligation for BEAD-funded infrastructure. Finally, 2 CFR § 200.334 requires that subgrantees must retain all records related to federal awards for at least three years after final payments and the award is closed out.

Appendix D: BEAD EHP Resources for Subgrantees

BEAD-Specific NEPA / EHP Guidance

2025 BEAD Program General Terms and Conditions – Section 13 (REVISED EHP Review)
Defines binding NEPA/EHP requirements for BEAD, including joint lead agency roles and prohibition on construction before NEPA clearance.
https://broadbandusa.ntia.gov/sites/default/files/2026-01/BEAD_GTCs_11_18_2025.pdf

NEPA for BEAD Frequently Asked Questions (v2.0)
Detailed FAQ covering NEPA applicability, staffing, Tribal engagement, timelines, and subgrantee document preparation.
https://broadbandusa.ntia.gov/sites/default/files/2025-07/NEPA_for_BEAD_FAQs_v2.pdf

Smart Start – How to Plan and Prepare for NEPA Compliance for BEAD
Early-stage planning guide for states on building NEPA capacity and integrating environmental review into BEAD timelines.
https://broadbandusa.ntia.gov/technical-assistance/Smart_Start_NEPA_Compliance_for_BEAD

Smart Start Part II – Implementing BEAD Subgrant Permitting Conditions
Provides model permitting SACs and guidance for embedding NEPA obligations into subaward agreements.
https://broadbandusa.ntia.gov/technical-assistance/Smart_Start_II_BEAD_Subgrant_Permitting_Conditions and https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BEAD_NEPA_Smart_Start_II_BEAD_Subgrant_Permitting_Conditions.pdf

ESAPTT Overview
Explains NTIA's environmental screening and permitting tracking tool for BEAD NEPA workflow.
https://broadbandusa.ntia.gov/technical-assistance/ESAPTT_Overview

ESAPTT External User Guide
Step-by-step instructions for using ESAPTT, including NEPA project setup, screening, and decision documentation.
https://broadbandusa.ntia.gov/technical-assistance/NTIA_ESAPTT_User_Guide

Dividing BEAD Subgrant Awards into Multiple ESAPTT NEPA Project Areas
Guidance on when and how to split a BEAD subgrant into multiple NEPA project areas.
https://broadbandusa.ntia.gov/technical-assistance/NEPA_Project_Areas_CSV_Instruction_Guide

BEAD Guidance on NEPA and NHPA for LEO Satellite Service
Defines how NEPA/NHPA apply to LEO satellite solutions in BEAD projects.
https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BEAD_LEO_Guidance_Oct_2025.pdf

Streamlined Environmental Review & Permitting for Broadband: A Roadmap
High-level roadmap for environmental review efficiency and permitting strategies.
https://broadbandusa.ntia.gov/sites/default/files/2025-11/NTIA_Streamlining_Environmental_Review_and_Permitting.pdf

NEPA for BEAD: Milestone Schedule & NEPA Timeline
Outlines expected NEPA workflow and milestone timing relative to BEAD implementation.
https://broadbandusa.ntia.gov/technical-assistance/NEPA_for_BEAD_Milestones_Schedule_and_Timeline_Guidance and https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA_for_BEAD_Milestone_Schedule_NEPA_Timeline.pdf

Permitting Roundtables: Interagency Collaboration Update
NTIA's plan for roundtables to support permitting coordination with states and federal partners.
https://broadbandusa.ntia.gov/technical-assistance/EHP_Permitting_Roundtables_Interagency_Collaboration_Update

Programmatic Environmental Impact Statement (PEIS) Evaluation Sample Memo
Sample memo demonstrating use of FirstNet PEIS for tiered reviews under BEAD.
https://broadbandusa.ntia.gov/technical-assistance/Programmatic_Environmental_Impact_Statement_Evaluation_Sample_Memo_and_Recommendations

Evaluating FirstNet PEIS Sections for States/Territories
Guidance on applying FirstNet PEIS content for BEAD tiered reviews.

https://broadbandusa.ntia.gov/technical-assistance/DOC_NTIA_BEAD_Evaluating_FirstNet_PEIS

ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package
APPEIT tool for use by subgrantees.
https://nbam.ntia.gov/content/37fa42c6313e4bdb9d8a9c05d2624891/about

Sample Project Descriptions and Maps for BEAD Environmental and Historic Preservation (EHP) Review
Guidance on submitting ESAPTT Grants Project Records.
https://broadbandusa.ntia.gov/sites/default/files/2026-01/DOC_NTIA_Sample_ESAPTT_Project_Maps_and_Descriptions_01_26.pdf

Cross-Program NEPA / EHP Guidance Used in BEAD

NTIA NEPA Compliance Guidance (2025)
NEPA compliance manual for all NTIA programs, including BEAD.
https://broadbandusa.ntia.gov/technical-assistance/Guidance_on_NTIA_NEPA_Compliance

Tiered EA Template & Guidance
Provides detailed instructions for preparing tiered EAs referencing FirstNet PEIS.
https://broadbandusa.ntia.gov/nepa-resources-general-nepa-guidance-and-tools

Environmental & Historic Preservation Fact Sheet (2022)
High-level overview of NEPA, NHPA, and EHP obligations for broadband programs including BEAD.
https://broadbandusa.ntia.gov/technical-assistance/EHP_Fact_Sheet_2022

NHPA Section 106 Consultation Process Fact Sheet
Outlines Section 106 consultation workflow for BEAD and other broadband deployments.
https://broadbandusa.ntia.gov/technical-assistance/NHPA_Consultation_Process_Fact_Sheet

Guide to Streamlined ESA Compliance
Instructions for Endangered Species Act (ESA) Section 7 review for broadband projects.
https://broadbandusa.ntia.gov/nepa-resources-general-nepa-guidance-and-tools

USFWS Section 7 "No Effect" List and Consultation Memo
Lists project types typically considered "no effect" for ESA purposes.
https://broadbandusa.ntia.gov/sites/default/files/2025-08/NTIA_FWS_Non-Federal_Designation_Memo_2025.pdf

NEPA/EHP Compliance Webinar Deck
Training slide deck covering NEPA, NHPA, ESA, and related requirements.
https://broadbandusa.ntia.gov/sites/default/files/2024-04/NEPA_EHP_Webinar_Deck.pdf

NEPA Resources – General NEPA Guidance & Tools (Landing Page)
Aggregated NTIA NEPA tools used by BEAD implementers.
https://broadbandusa.ntia.gov/nepa-resources-general-nepa-guidance-and-tools

Notice of Newly Established NEPA Categorical Exclusions (2024)
Categorical exclusions (CEs) established by the First Responder Network Authority (FirstNet Authority), an independent authority within NTIA, that cover categories of actions under the National Environmental Policy Act (NEPA) that NTIA proposes to take, applicable to IIJA programs, including Tribal Broadband Connectivity Program (TBCP) and BEAD.
https://broadbandusa.ntia.gov/funding-programs/policies-waivers/Notice_of_Newly_Established_NEPA_Categorical_Exclusions

ACHP Program Comment for Communications Projects on Federal Lands and Property (Synopsis of 2024 Update)
Synopsis of Advisory Council on Historic Preservation (ACHP) comments to guide and accelerate the review of broadband deployment and other communications projects on federal lands under NHPA Section 106.
https://www.achp.gov/digital-library-section-106-landing/program-comment-federal-communications-projects

ACHP Program Comment for Federal Communications Projects
Advisory Council on Historic Preservation (ACHP) Program Comment Form, instructions, and FAQs to guide and accelerate the review of broadband deployment and other federal communications projects under NHPA Section 106.
https://broadbandusa.ntia.gov/technical-assistance/The_Advisory_Council_on_Historic_Preservation

General BEAD Program Resources

BEAD NOFO
Notice of Funding Opportunity for BEAD Program.
https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD NOFO.pdf

BEAD Restructuring Policy Notice
NTIA's new rules and requirements issued June 6, 2025.
https://www.ntia.gov/other-publication/2025/bead-restructuring-policy-notice

General Terms and Conditions for NTIA BEAD Program Funds
NTIA's revised program terms and conditions.
https://broadbandusa.ntia.gov/sites/default/files/2026-01/BEAD_GTCs_11_18_2025.pdf

Appendix E: Active Subscriber Testing Requirements

This appendix details testing requirements associated with the reimbursement milestones for "Network Activation & Program Closeout" (terrestrial projects) and "Capacity Verification – Take-Rate" (LEO projects). The testing specified in this document is project-specific and does not fulfill the requirements for annual performance tests described in Appendix A but has been aligned with the annual tests to leverage the same applicable test parameters and test configuration.

BEAD-funded networks must meet three core technical standards:

- Speed requirements of at least 100 Mbps download and 20 Mbps upload for broadband serviceable locations and 1 Gbps symmetrical for community anchor institutions;
- Latency standards requiring that 95 percent of round-trip measurements fall at or below 100 milliseconds; and
- Reliability standards limiting network outages to no more than 48 hours on average over any 365-day period (99.45% uptime), excluding natural disasters, force majeure events, and publicized, scheduled maintenance.

To comply with speed standards, providers must demonstrate that 80 percent of download measurements meet or exceed 80 percent of the required download speed, and 80 percent of upload measurements meet or exceed 80 percent of the required upload speed—for example, for 100/20 Mbps service, 80 percent of tests must achieve at least 80/16 Mbps.

WBO will select active subscriber locations within the subgrantee's project area for performance testing from the list of active subscriber locations provided by the subgrantee. Selection criteria are as follows:

- Maximum of 10 percent of active subscriber locations, not to exceed 50, for each BEAD project.
- For subgrantees with more than 10 but fewer than 100 active subscriber locations in a given project, WBO will select 10 locations for testing.
- For subgrantees with 10 or fewer active subscriber locations in a given project, all locations will be selected for testing.
- If none of the locations selected by WBO subscribes to a top-tier speed offering, the subgrantee will include testing at a location that does

subscribe to a top-tier speed offering. If there are no locations within the project area that subscribe to the top-tier service offering, the subgrantee will upgrade one of the locations selected by WBO temporarily to allow for testing at the top-tier speed. If the project area includes both CAI and BSL locations, the subgrantee will conduct testing at one CAI and one BSL location that subscribe to the top-tier speed offering. If no CAI or BSL location in the project area currently subscribes to the top-tier speed, the subgrantee will temporarily upgrade one CAI and one BSL location, as selected by WBO, to the top-tier speed to facilitate testing.

Subgrantees will conduct performance testing and submit test results to WBO according to the following process:

- WBO will select locations within the subgrantee's project area for performance testing based on the number of locations in a project area where the subgrantee has confirmed active subscribers, as described above.
- The subgrantee will conduct speed and latency tests for each location selected by WBO.
    - Upload/Download tests will be conducted, at a minimum, once per hour from 6:00 PM to 12:00 AM, for a minimum of six tests per location over any contiguous 72-hour period following activation of a given subscriber.
    - Latency tests are conducted in each minute of the hour from 6:00 PM to 12:00 AM, which corresponds to 60 tests in each hour and a total of 360 tests for each address.
- Subgrantees must provide the test results to WBO using the "Active Subscriber Test Template" with applicable milestone reimbursement requests.

Tests will be conducted to the premises of selected active subscribers from a remote test server located at, or reached by passing through, an FCC-designated Internet exchange point (IXP), which is any building, facility, or location housing a public Internet gateway that has an active interface to a qualifying Internet Autonomous System (ASN). To qualify, the ASN must either appear on the FCC's Appendix B list of qualifying ASNs (pages 40 and 41 of FCC-19-104A1) or satisfy the alternative qualifying criteria established under footnote 36 on page 8 of FCC-19-104A1. Criteria (1), (2), and (3) can be

verified using the CAIDA AS Rank database at https://asrank.caida.org/, while criteria (4) and (5) can be verified using PeeringDB at https://www.peeringdb.com/. The testing methodology allows providers to use built-in capabilities of customer premises equipment, such as optical network terminals or residential gateways, or to deploy dedicated measurement devices at subscriber locations, with testing conducted from customer premises to FCC-designated Internet exchange points.[96]

As noted, testing is required only for the sample set of locations selected by WBO, which can be initiated any date after subscriber activation is complete for a given location prior to submitting the test data for the corresponding reimbursement request. A subgrantee may elect to test all locations upon activation to avoid future disruption to active subscribers, but only the test data associated with the sample locations selected by WBO should be submitted with the reimbursement request.

[96] Federal Communications Commission, "In the Matter of Connect America Fund; Order on Reconsideration," WC Docket No. 10-90, FCC 19-104A1 (adopted Oct. 25, 2019; released Oct. 31, 2019), available at https://docs.fcc.gov/public/attachments/FCC-19-104A1.pdf.

Appendix F: BEAD Subgrantee EHP Questionnaire

This questionnaire is presented as a separate Excel file.

Appendix G: Additional Resources

Additional resources providing information and guidance relevant to the BEAD Program can be found on WBO's website at https://broadband.wyomingbusiness.org/bead/ and NTIA's website at https://broadbandusa.ntia.gov/funding-programs/broadband-equity-access-and-deployment-bead-program.

For more information regarding BEAD, please send questions to broadbandoffice@wyo.gov.

Appendix H: Glossary

The following acronyms and terms appear in this Program Guide. The definitions presented here are a general guide; subgrantees should conduct additional research on terms as needed.

ACHP (Advisory Council on Historic Preservation) – Federal agency that provides guidance on historic preservation review under NHPA Section 106

ADSS (All Dielectric Self-Supporting) – Type of aerial fiber optic cable infrastructure support

AOR (Authorized Organizational Representative) – Individual with authority to certify plans and documents on behalf of the subgrantee organization

APPEIT (ArcGIS Pro Permitting and Environmental Information Tool) – NTIA tool to help subgrantees with permitting planning and environmental review preparation

BABA (Build America, Buy America) – Federal requirement establishing domestic content procurement standards for BEAD-funded infrastructure projects

BEAD (Broadband Equity, Access, and Deployment) Program – Federal program designed to expand high-speed internet access by funding planning and infrastructure deployment

BIA (Bureau of Indian Affairs) – Federal agency involved in permitting for projects on Tribal lands

BLM (Bureau of Land Management) – Federal land management agency

BOM (Bill Of Materials) – Documentation of material types and quantities needed to deploy the proposed network

BOR (Bureau of Reclamation) – Federal water management agency

BSL (Broadband Serviceable Location) – Locations that subgrantees have committed to serve as part of the BEAD Program

CE (Categorical Exclusion) – Type of NEPA analysis for projects with minimal environmental impact

COR (Change Order Request) – Formal request to revise Project Budget, Schedule, Scope, or Contact Information

CPE (Customer Premises Equipment) – User-installed hardware that connects end-user locations to an ISP such as a low-Earth orbit (LEO) satellite provider

EA (Environmental Assessment) – Mid-level NEPA environmental analysis document

EC (Extraordinary Circumstances) – Conditions that may preclude use of a Categorical Exclusion and require additional NEPA review

EFH (Essential Fish Habitat) – Protected aquatic habitat requiring assessment under NMFS review

EHP (Environmental and Historic Preservation) – Collective term for environmental and cultural resource compliance requirements

EIS (Environmental Impact Statement) – Most comprehensive level of NEPA environmental analysis

ESA (Endangered Species Act) – Act that establishes protections for fish, wildlife, and plants that are listed as threatened or endangered

ESAPTT (Environmental Screening and Permitting Tracking Tool) – NTIA tool for paperless environmental reviews and expedited NEPA approvals

FCC (Federal Communications Commission) – Federal agency regulating communications

FEMA (Federal Emergency Management Agency) – Federal agency providing floodplain mapping

GAGAS (**Generally Accepted Government Auditing Standards)** – U.S. Government Accountability Office (GAO) standards, commonly referred to as the "Yellow Book," that apply to entities that receive government awards

IIJA (Infrastructure Investment and Jobs Act) – Federal legislation that established the BEAD Program

IPaC (Information for Planning and Consultation) – U.S. Fish & Wildlife Service tool for endangered species consultation

IRU (Indefeasible Right-of-Use) – Long-term lease agreement for telecommunications facilities

ISP (Internet Service Provider) – Company providing broadband internet service

IXP (Internet Exchange Point) – Public internet gateway with active interface to a qualifying Internet Autonomous System

LEO (Low-Earth Orbit) – Satellite technology type eligible for BEAD funding with a 10-year performance period

NEPA (National Environmental Policy Act) – Federal law requiring environmental impact analysis for federally funded projects

NHPA (National Historic Preservation Act) – Federal law protecting historic and cultural resources, particularly Section 106 requiring consultation

NIST (National Institute of Standards and Technology) – Federal agency partnering with NTIA on BEAD implementation

NMFS (National Marine Fisheries Service) – Federal agency responsible for marine species and habitat protection

NOFO (Notice of Funding Opportunity) – Federal document announcing grant funding availability and requirements

NTIA (National Telecommunications and Information Administration) – Federal agency administering the BEAD Program

OIG (Office of Inspector General) – Federal office receiving fraud, waste, and abuse allegations

PEIS (Programmatic Environmental Impact Statement) – Comprehensive environmental analysis that can support tiered reviews

SAC (Specific Award Conditions) – Special conditions placed on individual awards to address identified risks

SAR (Semi-Annual Report) – Report submitted to NTIA twice per year documenting program progress

SHPO (State Historic Preservation Officer) – State official responsible for historic preservation review

TBCP (Tribal Broadband Connectivity Program) – NTIA program that supports Tribal governments in bringing high-speed Internet to Tribal lands

THPO (Tribal Historic Preservation Officer) – Tribal official responsible for historic preservation on Tribal lands

USAC (Universal Service Administrative Company) – Organization that administers universal service programs

USACE (U.S. Army Corps of Engineers) – Federal agency managing water resources and issuing permits for waterway crossings

USFWS (U.S. Fish & Wildlife Service) – Federal agency responsible for endangered species and wildlife habitat protection