



## MBI BEAD Pre-Qualification FAQ

#	Question	MBI Response
1.	Will there be an opportunity to correct any deficiencies in the application?	Applicants that do not satisfy the requirements in the Pre- Qualification Application Guide will have the opportunity to resubmit their pre-qualification information and documentation during the BEAD program application stage.
2.	Is there a deadline to submit questions regarding the prequalification application?	MBI will accept questions about the pre-qualification process through October 23, 2024.
3.	Does MBI know RFPs will be released for the program and when funds will be expended?	MBI’s federally-approved <a href="#">BEAD Initial Proposal, Volume II</a> contains Information about MBI’s plan to solicit proposals for BEAD funding. MBI currently anticipates launching Round 1 of the BEAD Program in December/January. The launch of Round 1 is dependent on NTIA’s approval of data from the BEAD Challenge Process administered by MBI.
4.	Can MBI please provide additional information regarding the CEO/CFO reference request. It references completion before the “application deadline.” Is this before the pre-qualification deadline or the full application deadline?	<p>The CEO/CFO reference request is only required for certifying that the applicant organization is compliant with applicable law. The CEO/CFO will get an email through the Submittable application portal requiring a signature.</p> <p>Applicants that want to be pre-qualified prior to the launch of Round 1 of BEAD funding are required to complete the full pre-qualification</p>

		<p>application by the 10/28/2024 deadline. If an applicant does not complete the full application by the deadline, they will have to submit it as part of the full program application.</p>
5.	<p>Can MBI confirm how to upload evidence of FCC 477 compliance?</p>	<p>There is no upload required in the Pre-Qualification Phase. Applicants must check a box to certify that they have submitted filings with the FCC.</p>
6.	<p>Regarding the public funding section of the application where it asks for a list of projects. Does the question only relate to public funding activity in Massachusetts or in any state the applicant operates in?</p>	<p>The applicant should list every project being undertaken with public funds anywhere in the United States and its territories.</p>
7.	<p>With the release of NTIA's Alternative Technology Guidance, how does MBI envision incorporating alternative technologies in the subgrantee process?</p>	<p>MBI recognizes the importance of identifying an Extremely High Cost Per Location Threshold (EHCPLT) that will allow for as many end-to-end fiber projects to be deployed as possible, which is a primary goal of the BEAD program. The EHCPLT will be determined no earlier than after Round One applications have been reviewed, in a manner that emphasizes fiber prioritization to the extent that it is economically reasonable, while confirming that MBI has sufficient funds to achieve universal broadband access and leaving fiscal space for other priorities. The MBI will review the available BEAD allocation to determine if it can rely solely on fiber deployment to serve all unserved and underserved locations. The EHCPLT may allow for the use of alternative technology types where fiber is cost-prohibitive but will be designed in a way that prioritizes end-to-end fiber projects, to maximize the impact of the BEAD program. To set an appropriate EHCPLT,</p>

		<p>MBI will develop a cost model by analyzing data available from all awards issued under the Gap Networks Program, CostQuest data, and data from the tentative awards made under Round 1 of the BEAD Program. MBI will utilize the data generated by the cost model to establish the EHCPLT to inform subgrantee selection determinations that maximize the deployment of end-to-end fiber solutions while achieving the dual objectives of (1) ensuring that there is sufficient funding to serve all remaining unserved and underserved locations; and (2) investing BEAD funds on economically reasonable projects.</p>
8.	<p>Does MBI plan on filing comments at NTIA in response to their alternative technology guidance?</p>	<p>NTIA closed the public comment for their alternative technology guidance on September 10, 2024. MBI did not submit comments.</p>
9.	<p>Page 2 of the NTIA guidance specifically notes: “Any Eligible Entity that received NTIA approval of Volume II of its BEAD Initial Proposal prior to the publication of this updated guidance and that wishes to modify its Volume II or Initial Proposal Funding Request to reflect this updated guidance should contact its Federal Program Officer for direction.” Does MBI anticipate they will be modifying BEAD Volume II to reflect this new guidance?</p>	<p>MBI does not anticipate modifying its BEAD Initial Proposal Volume II at this time. MBI will review the final version of the guidance and determine whether it would be appropriate to pursue any modifications to the BEAD Initial Proposal.</p>
10.	<p>Does MBI anticipate holding two rounds of bidding with alternative technology providers bidding in the second round? Or participating in another process specific to alternative technology providers?</p>	<p>Following the prequalification phase, MBI will accept applications for Round One, which will be based on project areas that serve a single municipality.</p> <p>Round Two will be conducted in a manner similar to Round One, except that MBI will</p>

		<p>define project service areas. MBI will make this determination based on the number and geography of unserved and underserved BSLs remaining after Round One. Round Two will not be complete until MBI determines that universal 100/20 broadband coverage throughout Massachusetts is achieved, and MBI will reach out and solicit proposals from specific ISPs, alternative technology solutions, and all other means necessary within the framework of the BEAD Program to complete coverage for any locations still lacking broadband access.</p>
11.	<p>Will MBI be updating their maps of eligible locations after the first round of bids indicating the remaining locations?</p>	<p>Yes, MBI will identify the remaining BSLs for Round 2 of the BEAD Deployment program.</p>
12.	<p>If an applicant believes it has information that qualifies for protection under the exclusion in the Massachusetts Public Records Law, Mass. Gen. Laws ch. 66, § 10, for trade secrets and other confidential information obtained from a party, how should that information be labeled? What other action, if any, should the applicant take to obtain confidential treatment of such information?</p>	<p>All responses, applications, data, materials, information, and documentation submitted to the Massachusetts Technology Collaborative (“MassTech”) by an applicant seeking to be pre-qualified to receive funding under the Massachusetts Broadband Equity, Access, and Deployment (“BEAD”) Program shall become MassTech’s property and may be subject to public disclosure. As public entities, MassTech and MBI are subject to the Massachusetts Public Records Law (set forth at Massachusetts General Laws Chapter 66). There are extremely limited and narrow exceptions to disclosure under the Public Records Law. If an Applicant wishes to have MassTech treat certain information or documentation as confidential, the Applicant must submit a written request to MassTech’s General Counsel, Jennifer Saubermann, at saubermann@masstech.org, prior to submission. The request must precisely identify the information and/or documentation that is the subject of the request and provide a detailed explanation supporting the application of the statutory exemption(s) from the public records cited by the Applicant. The General</p>

		Counsel will issue a written determination within five (5) business days of receipt of the written request. If the General Counsel approves the request, the Applicant shall clearly label the relevant information and/or documentation as “CONFIDENTIAL” in the Pre-Qualification Application.
13.	Can MBI confirm if an applicant can increase the price of its BEAD low-cost service option in line with consumer price inflation?	Detailed requirements regarding the BEAD low-cost service option will be provided when MBI launches the subgrantee selection process.
14.	The ownership information section of the pre-qualification application seeks information specified in 47 C.F.R. § 1.2112(a)(1)-(7). FCC Form 602 collects the ownership data set forth in 47 C.F.R. § 1.2112(a)(1)-(7). If an applicant has filed a FCC Form 602 and the information is still accurate, can the applicant attach a PDF of its FCC Form 602 to answer any questions that seek information set forth in 47 C.F.R. § 1.2112(a)(1)-(7)?	Yes, the applicant may attach a PDF of its FCC Form 602, <b>however</b> , applicants must provide a comprehensive disclosure of their ownership information, adhering to the specifics laid out in 47 CFR part 1.2112(a)(1)-(7). This regulation mandates the full disclosure of direct and indirect ownership interests, including details of any parties with a 10% or more stake, the nature of the interest, and the inter-relationships with any FCC-regulated entities.
15.	Can an applicant submit an Excel spreadsheet with the ownership information?	No, all applicant information <b>MUST</b> be submitted through the online application portal Submittal. Submittable will prompt applicants for each section to be answered and will note if an upload is required.

<p>16.</p>	<p>Does MBI intend to adopt in full the exceptions, adjustments, and clarifications to certain provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), codified at 2 C.F.R. Part 200, and the application of related provisions of the Uniform Guidance to the Broadband Equity, Access and Deployment (BEAD) Program as set forth in NTIA’s Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program (available here)? If not, please specifically identify each of the elements of the Policy Notice that are not being adopted by MBI. Alternatively, please confirm that the elements of the Policy Notice are being adopted in full.</p>	<p>Details regarding the applicability of the provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), codified at 2 C.F.R. Part 200, and the application of related provisions of the Uniform Guidance to the Broadband Equity, Access and Deployment (BEAD) Program will be provided when MBI launches the subgrantee selection process.</p>
<p>17.</p>	<p>Can MBI confirm that all awards will be considered to be fixed-amount subawards within the meaning of this policy notice.</p>	<p>Details regarding subaward payment provisions will be provided when MBI launches the subgrantee selection process.</p>
<p>18.</p>	<p>Can MBI confirm if neither federal prevailing wage laws (e.g., the Davis-Bacon Act) nor any Massachusetts or local prevailing wage laws apply to the BEAD-funded broadband deployment projects?</p>	<p>Details regarding the applicability of prevailing wage laws will be provided when MBI launches the subgrantee selection process.</p>
<p>19.</p>	<p>If prevailing wage laws do apply, please confirm that MBI will provide the applicable prevailing wage rates and benefits during the bidding phase.</p>	<p>Details regarding the applicability of prevailing wage laws and any associated requirements will be provided when MBI launches the subgrantee selection process.</p>

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