



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

Benefit of the Bargain Grant Solicitation Round

Qualification Application Guide

Released on June 23, 2025

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Introduction

The purpose of this qualification application guide is to assist potential grantees in assembling the proper information for qualification in the Broadband Equity, Access and Deployment (BEAD) funding program. Please use this guide as a resource when preparing to submit organizational information and certifications for the BEAD Program.

Submission Guidelines

All applications must be submitted using an online application through [MBI's Submittable](#) online grant application portal. Applications must be complete with all sections clearly labeled.

Contact for Questions

If you have any questions about or during the process, please contact MBI using the broadband@masstech.org email. Please include "BEAD Qualification for Benefit of the Bargain Round" in the subject line. If you need technical support for Submittable please use the online [Submittable Help Center](#).

Applicability of the Massachusetts Public Records Law

All responses, applications, data, materials, information, and documentation submitted to the Massachusetts Technology Collaborative ("MassTech") by an applicant 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 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 Qualification Application.

Program Background

BEAD Program Overview

The National Telecommunications and Information Administration's (NTIA) Broadband Equity, Access and Deployment (BEAD) Program provides \$42.45 billion to expand high-speed internet access across the U.S. states and territories. The Commonwealth of Massachusetts has been allocated BEAD funding totaling \$147 million to support expansion of broadband access to unserved and underserved locations. The Executive Office of Economic Development (EOED), working in close collaboration with the Massachusetts Broadband Institute (MBI), is managing the Commonwealth's BEAD funding. EOED is the prime recipient and responsible for the delivery, reporting, and compliance related to the funding.

The BEAD program in Massachusetts aims to provide universal broadband access and support digital equity initiatives. The Commonwealth is in an advantageous situation for BEAD broadband deployment projects as the Broadband Infrastructure Gap Networks Grant Program (Gap Networks Program), funded through the ARPA Capital Projects Fund (CPF), has reduced the number of unserved and underserved locations in the Commonwealth prior to BEAD funding becoming available.

On June 6, 2025, the National Telecommunications Information Administration (NTIA) released a Policy Notice that enacts updates to the BEAD Program. MBI is required to implement significant changes to the BEAD Subgrantee Selection Process to align with the requirements in the new Policy Notice. MBI has updated this Qualification Guide to incorporate the program modifications that impact the BEAD qualification process.

Program Eligibility

The following types of entities may apply for BEAD grants:

- Private companies (e.g., corporations, limited liability companies, general partnerships, limited partnerships, etc.).
- Local governmental entities (e.g., municipalities or municipal light plants that offer broadband service),
- Native American Indian Tribes
- Nonprofit organizations.
- Co-operatives, electric co-operatives, and public or private utilities.
- Public utility districts.
- Public Private Partnerships, which are long-term agreements between local government entities and private entities for the delivery and funding of broadband services.
- Other entities that develop and/or operate broadband networks and can demonstrate the experience, capacity and financial resources and stability to satisfy the grant obligations.

Key Definitions

Applicant: Entities who may be interested in applying for BEAD broadband deployment projects in Massachusetts and are submitting pre-qualification information.

Broadband; Broadband Service: The term “broadband” or “broadband service” has the meaning given the term “broadband internet access service” in Section 8.1(b) of title 47, Code of Federal Regulations, or any successor regulation, meaning it is a mass-market retail service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up internet access service. This term also encompasses any service that the Commission finds to be providing a functional equivalent of the service described in the previous sentence or that is used to evade the protections set forth in this part.

Broadband DATA Maps: The term “Broadband DATA Maps” means the maps created by the Federal Communications Commission under Section 802(c)(1) of the Communications Act of 1934 (47 U.S.C. § 642(c)(1)).

Director/Officer Level Employee: The term “Officer/Director-level employee” of an Applicant or Subgrantee may include roles such as President, Chief Executive Officer, Chief Financial Officer, Treasurer, or equivalent position.

Program: The term “Program” means MBI’s Broadband Equity, Access, and Deployment Program.

Key Project Personnel: The term “key project personnel” means all personnel who are likely to have a role on the potential broadband project(s) to be funded by this grant award, including but not limited to, a chief technology officer, project engineer, and contractor oversight team.

Subgrantee/Subrecipient: The term “subgrantee” or “subrecipient” means an entity that receives BEAD grant funds from the Commonwealth of Massachusetts to carry out eligible activities.

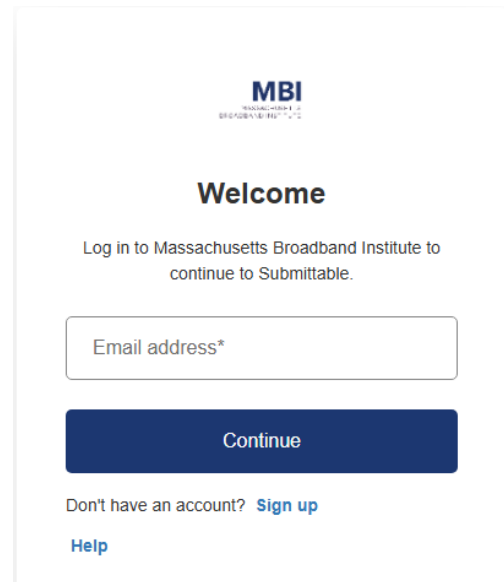
Unique Entity Identifier (UEI): The UEI is the primary key used to identify an entity throughout the federal awarding lifecycle and in SAM.gov. The BEAD NOFO requires “each subrecipient must obtain a UEI and provide it to the Eligible Entity.” Entities doing business with the federal government must have an active registration in SAM.gov. Please note that your application will not be accepted unless you have an active SAM.gov registration and, if awarded, no funding can be reimbursed in the future unless the SAM.gov registration is active. If your company does not already have a UEI, please obtain one by visiting sam.gov and registering. (NOTE: The UEI was previously known as a DUNS number.)

Getting Ready for Submittable

Applicants should prepare for the opening of the BEAD Benefit of the Bargain Round by creating a Submittable account, if they have not done so already. To do this, applicants should navigate to MBI's [Submittable landing page](#). This is where Applicants will be able to access the application once it is live.

To create an account, navigate to the [Submittable Login Page](#) and under the "Continue" button, click Sign Up. Please use an email address that you regularly check as MBI will send updates about the application through Submittable to the email associated with the account.

If you need more information on creating an account, please review this [step-by-step guide from Submittable](#).



Required Information

Section One: General Applicant Information

Documents Required: Applicant W9

Submittable Questions:

- Lead Organization Type: Check the appropriate box for your organization.
- FCC Provider ID: This number is required if the Lead Organization is a Broadband Service Provider.
- Lead Organization Tax Identification: This may be the organization's EIN or the individual's tax identification number.
- Lead Organization Tax Form: A completed W9 form will be uploaded as a PDF
- Company Name: Include full company name.
- Company Physical Address: Include full company address.
- Primary First and Last Name: This should be the person primarily responsible for completing the application.
 - Primary Title
 - Primary Email
 - Primary Phone
- Authorized Organizational Representative (AOR) First Name and Last Name
 - AOR Title
 - AOR Email
 - AOR Phone
- If submitting application as a public private partnership please provide information related to the other participants in the partnership
 - Company Name: Include full company name
 - Company Address: Include full company address

- Primary First and Last Name: This should be the person primarily responsible for completing the application.
 - Primary Title
 - Primary Email
 - Primary Phone
- Authorized Organizational Representative (AOR) First Name and Last Name
 - AOR Title
 - AOR Email
 - AOR Phone

Section Two: Financial Capability Certifications

Documents Required: N/A

Submittable Questions:

- Applicant must demonstrate financial capability by certifying that they:
 - Are financially qualified to meet the obligations associated with the BEAD project(s).
 - Will have funds available for all project costs that exceed the amount of the grant.
 - Will comply with all BEAD Program requirements, including service milestones.
 - Has and will continue to have sufficient financial resources to cover eligible project costs until further disbursements are authorized by MBI.
 - Will comply with uniform administrative requirements, cost principles, and audit requirements to complete and operate the project.

Section Three: Audited Financial Statements

Documents Required:

- Audited Financial Statements
- 10-K Statements and latest 10-Q Statement (if Applicant is a publicly-held company)

Submittable Questions:

- Applicants shall provide audited financial statements from the prior fiscal year that are audited by an independent certified public accountant. If the Applicant has not been audited during the ordinary course of business, in lieu of submitting audited financial statements, it must submit unaudited financial statements from the prior fiscal year and certify that it will provide financial statements from the prior fiscal year that are audited by an independent certified public accountant at such time as the Applicant applies for BEAD subgrant funding.
- If the Applicant is publicly-held, provide direct links to 10-K statements for the five most recent fiscal years and a 10-Q for the most recent quarter (if the 10-Q was filed after the most recent 10-K).

Section Four: Managerial Capability

Documents Required:

- Applicant Organizational Chart
- Corporate Organizational Chart
- Key Business Partner Description
- Disclosure of Organizational Changes
- Resumes/Bios for Key Project Personnel

Submittable Questions:

- Applicant Organizational Chart
 - Applicants must submit an organizational chart that includes all Key Project Personnel within the organization who are likely to have a financial, managerial or technical role on the potential broadband project(s) to be funded by this grant award and an explanation of their roles and responsibilities.
- Corporate Organizational Chart
 - Applicants must submit a corporate organizational chart identifying the parent company and any subsidiaries or affiliates that will be performing work in Massachusetts and identifying the company serving as the Applicant to the BEAD Program. The Applicant must be able to contract, receive, and implement grant awards in Massachusetts.
- Description of Key Business Partners
 - Applicant must submit a description of Key Business Partners that will help deliver the proposed project and the roles and responsibilities of each entity.
- Disclosure of Organizational Changes
 - Applicants must submit a document detailing recent and upcoming material organizational changes including mergers and acquisitions.
- Resumes/Bios for Key Project Personnel
 - Applicants must submit resumes for all Key Project Personnel shall also be provided detailing the education and years of experience for each. Each resume should demonstrate relevant experience with last mile broadband deployment projects of similar scope and scale. Each resume shall also identify relevant credentials. MBI suggests that resumes be no longer than 1 page per individual. An Applicant may submit bios with comparable information for Key Project Personnel in lieu of resumes.
- Project History
 - Applicants must provide a narrative describing three last mile broadband deployment projects performed in the past three years. The narrative should include the approach taken, the type of technology deployed, the number of premises passed, and the results accomplished. If an Applicant has not performed three last mile broadband deployment projects in the past three years, the Applicant shall provide a narrative describing any such projects

performed in the last three years accompanied by a narrative describing how the Applicant will provide sufficient organizational capacity to successfully complete the proposed projects.

- Project Readiness
 - Each Applicant must provide a narrative describing the Applicant's readiness to manage a broadband services network project. The narrative should describe the experience and qualifications of key management for undertaking this project, its experience undertaking projects of similar size and scope, and relevant organizational policies.

Section Five: Technical Capability

Documents Required: N/A

Submittable Questions:

- Technical Capability Certification
 - Applicants must certify that they are technically capable of executing and managing the project efficiently. Please note that MBI will review the resumes/bios of Key Project Personnel submitted under the Managerial Capacity section.

Section Six: Compliance (Applicable Law)

Documents Required: N/A

Submittable Questions:

- Certification / Attestation
 - The officer (CEO/CFO) or Senior Executive Officer of the Applicant must certify that:
 1. the Applicant is capable of carrying out funded activities competently and in compliance with all applicable federal, state, territorial, and local laws; and
 2. The Applicant has consistently complied with all federal labor and employment laws.

Please note that in Submittable a form will be sent to the individual listed as the Senior Executive Officer, which must be completed before the application deadline.

Section Seven: Operational Capability

Required Documents (New Entrants Only):

- Financial Reports (If the Applicant has operated only as an electric transmission or service distribution company)
- Operational Capability

Submittable Questions:

- Reference to Other Relevant Qualification Submissions

- Please note that MBI will confirm that the Applicant submitted the certification in the Compliance section and will review the Project History provider in the Managerial Capability section as components of the Applicant's operational capability.
- History of Operations (*existing providers only*)
 - Applicants that have provided a voice, broadband, and/or electric transmission or distribution service for at least the two consecutive years prior to the date of the application submission or that it is a wholly owned subsidiary of such an entity, must attest to these facts and specify the number of years the Applicant or its parent company has been operating.
- FCC Compliance (*existing providers only*)
 - Applicants that have provided a voice and/or broadband service must submit a certificate, certifying that it has timely filed Federal Communications Commission Form 477s and the Broadband DATA Act submission, if applicable, for at least the two consecutive years prior to the data of this application submission, and otherwise has complied with the Federal Communications Commission's rules and regulations.
- New Entrants- Financial Reports
 - If the Applicant has operated only an electric transmission or distribution service company, they must submit qualified operating or financial reports for the prior two years, such as : Rural Utilities Service (RUS) Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities Cooperative Finance Corporation (CFC) Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; or the CoBank Form 7; or the functional replacement of one of these reports. See Rural Digital Opportunity Fund Order, 35 FCC Rcd at 719, n. 202.
 - Applicant must also certify that the submission is a true and accurate copy of the reports that were provided to the relevant institution.
- New Entrants – Operational Capability
 - Applicants that are new entrants to the broadband market must provide evidence to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities. The Applicant must submit narratives from contractors, subcontractors, or other partners describing relevant operational experience, or other comparable evidence.
 - Please note that MBI will also review the following information submitted by the Applicant under the Managerial Capacity section:
 - Resumes/Bios for Key Project Personnel, and
 - Project History.

Section Eight: Ownership Information

Required Documents: Ownership Information

Submittable Questions:

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. Each Applicant shall fully disclose the following:

1. **Applicant Information:** List the real party or parties with interest in the Applicant, including a complete disclosure of the identity and relationship of those persons or entities directly or indirectly owning or controlling (or both) the Potential Applicant.
2. **Stockholders Information:** List the name, address, and citizenship of any party holding 10% or more of stock in the Applicant, whether voting or nonvoting, common or preferred, including the specific amount of the interest or percentage held.
3. **Limited Partners Information:** In the case of a limited partnership, list the name, address and citizenship of each limited partner whose interest in the Applicant is 10% or greater (as calculated according to the percentage of equity paid in or the percentage of distribution of profits and losses).
4. **General Partners Information:** List, in the case of a general partnership, the name, address and citizenship of each partner, and the share or interest participation in the partnership.
5. **Limited Liability Company Information:** In the case of a limited liability company, list the name, address, and citizenship of each of its members whose interest in the Applicant is 10% or greater.
6. **Indirect Ownership Interest Information:** List all parties holding indirect ownership interests in the Applicant as determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain, that equals 10% or more of the Applicant, except that if the ownership percentage for an interest in any link in the chain exceeds 50% or represents actual control, it shall be treated and reported as if it were a 100% interest.
7. **FCC-Regulated Entity Information:** List any FCC-regulated entity or prospective applicant for an FCC license, in which the prospective applicant or any of the parties identified in paragraphs 1-5 of the above section, owns 10 percent or more of stock, whether voting or nonvoting, common, or preferred. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the prospective applicant (e.g., Company A owns 10 percent of Company B (the prospective applicant) and 10 percent of Company C, then Companies A and C must be listed on Company B's application, where C is an FCC licensee and/or license prospective applicant).

Section Nine: Public Funding

Documents Required: N/A

Submittable Questions:

Applicants are required to provide a list, for itself and for its affiliates, of any application the Applicant or its affiliates have submitted or plan to submit, and every broadband deployment project that the Applicant or its affiliates are undertaking or have committed to undertake at the time of the application using public funds, including but not limited to funds provided under:

- Families First Coronavirus Response Act (Public Law 116- 127; 134 Stat. 178)
- CARES Act (Public Law 116-136; 134 Stat. 281)
- Consolidated Appropriations Act, 2021 (Public Law 116-260; 134 Stat. 1182)
- American Rescue Plan of 2021 (Public Law 117-2; 135 Stat. 4)
- Federal Universal Service Fund high-cost program (e.g., RDOF, CAF)
- Any MBI or local universal service or broadband deployment funding program

Section Ten: Environmental and Historic Preservation (EHP) and Build America, Buy America Act (BABA) Compliance

Documents Required: N/A

Submittable Questions:

- EHP
 - Applicants must certify that they have been and will remain compliant with National Environmental Policy Act (NEPA) (42 U.S.C. part 4321 et seq.) and National Historic Preservation Act (NHPA) (54 U.S.C. part 300101 et seq.).
 - The Applicant must disclose any past violations of NEPA or NHPA requirements and must submit a detailed narrative documenting the circumstances of the noncompliance and any remedial efforts undertaken to prevent future noncompliance.
- BABA
 - Applicants must certify that they understand and commit to complying with the BABA requirements for the BEAD Program.
 - Applicants must provide detailed plans outlining their approach to remaining compliant with BABA requirements.
 - It is imperative that subgrantees thoroughly read and understand the BABA requirements and guidance to ensure compliance. The Notice of Final Waiver can be found at the following link: BABA Waiver Signed.pdf ([commerce.gov](https://www.commerce.gov)). Applicants should recognize the significance of adhering to these guidelines and take appropriate measures to equip themselves accordingly.

Section Eleven: Labor Standards and Protections

Required Documents: N/A

Submittable Questions:

- Applicants must submit a certification from a senior Officer/Director-level employee from the prospective subgrantee's organization, as well as a certification from a senior Officer/Director-level employee from all contractors and subcontractors evidencing consistent past compliance with federal labor and employment laws over the previous three years.
- Applicants must disclose any past violations through written confirmation of any instances in the preceding three years where they, or their affiliated contractors or subcontractors, violated regulations covered under the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws.

Section Twelve: Cybersecurity Compliance

Required Documents: N/A

Submittable Questions:

- The Applicant must certify that they will submit a cybersecurity plan to MBI that complies with the following requirements in the event that the Applicant elects to subsequently apply for subgrantee funding.
 - The Applicant has a cybersecurity risk management plan (the plan) in place that is either: (a) operational, if the prospective subgrantee is providing service prior to the award of the grant; or (b) ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award;
 - The plan reflects the latest version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity (currently Version 1.1) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented;
 - The plan will be reevaluated and updated on a periodic basis and as events warrant.

Section Thirteen: Supply Chain Risk Management (SCRM) Compliance

Documents Required: N/A

Submittable Questions:

- Applicant must certify that they will submit a supply chain risk management (SCRM) plan to MBI that complies with the following requirements in the event that the Applicant elects to subsequently apply for subgrantee funding.
 - The Applicant has a SCRM plan in place that is either: (a) operational, if the prospective subgrantee is already providing service at the time of the grant;

- or (b) ready to be operationalized, if the prospective subgrantee is not yet providing service at the time of grant award;
- The plan is based upon the key practices discussed in the NIST publication NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations and specifies the supply chain risk management controls being implemented;
 - The plan will be reevaluated and updated on a periodic basis and as events warrant; and
 - If the Applicant makes any substantive changes to the plan, a new version will be submitted to MBI within 30 days. The Applicant acknowledges that MBI will be required to provide a subgrantee's plan to NTIA upon NTIA's request.